

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Tricia <b>Last Name:</b> Stevens
<b>Email</b>	██████████
<b>Message</b>	Please see attached letter from the East Sacramento Community Association (ESCA, formerly East Sac Improvement Association) which supplements the letter sent from the Neighborhood Coalition.
<b>Upload File(s)</b>	CAAP ESCA 2022 comments.pdf



July 28, 2022

To: The City of Sacramento Climate Action and Sustainability Office

The East Sacramento Community Association (ESCA) thanks members of the Neighborhood Coalition for their hard work and thoroughness in reviewing the draft Climate Action and Adaptation Plan (CAAP). While ESCA participated with the coalition, our Board has reviewed the CAAP Review Letter being submitted to the City. In general, our Board supports the Letter, but we have some alternative points of view to offer to the discussion from a neighborhood perspective.

1. We recognize the importance of the City's tree canopy to quality of life in our neighborhoods and for its ability to reduce greenhouse gases (Section 1 of the Letter). However, we do not feel that it is appropriate to use this concern to justify opposition to densification. This motivation is even clearer in Section 6, which questions the correlation between densification and reduction of GHG. Properly managed to mitigate tree loss, densification can reduce urban sprawl into previously undeveloped areas, which could lead to even more tree loss and will increase GHG impacts from new traffic.
2. Sections 2 and 3 of the Letter request more detailed information about the plans for electrification of existing buildings. While some of the points are helpful, we think the main focus should be to design a long-term plan for electrification with adequate support to assist those on low and/or fixed incomes in making the transition. The plan must be long-term to allow our electric infrastructure to keep pace with the increasing demands brought about by increased electrification.
3. We fully support the ideas in Section 4 of the Letter regarding transportation. We would add the need to assure additional protected bikeways and to assist underserved neighborhoods, including the installation of community charging centers for electrical vehicles.

It is our hope that the Climate Action Plan Review Letter and our comments will contribute to a continued robust interaction between the City and its neighborhoods to achieve the best possible outcome in fighting climate change.

Sincerely,

Board of Directors  
East Sacramento Community Association (ESCA)  
(Formerly East Sacramento Improvement Association (ESIA))

<p><b>Full Name</b></p>	<p><b>First Name:</b> Jennifer <b>Last Name:</b> Holden</p>
<p><b>Email</b></p>	<p>████████████████████</p>
<p><b>Message</b></p>	<p>I submitted a letter on behalf of the Neighborhood Reviewer's group earlier today. I have not yet received an email confirmation that the submission was received. So I am attaching a second copy of this letter just in case... *^*^*^*^*^*^*^*^*^*^*^*^* We would like to begin a conversation between this office and the neighborhoods of Sacramento regarding the July 1 Climate Action and Adaptability Plan (CAAP) preliminary draft that was released on July 1, 2022. The following list highlights some of our concerns we would like to address with this office while the next draft of the CAAP is being prepared: 1. Sacramento's tree canopy must be adequately supported by current city policies to result in attaining carbon sequestration goals; 2. Funding, financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed; 3. Reducing GHG through electrification of existing buildings should be more thoroughly presented for analysis, including financial impacts on lower income individuals and businesses; 4. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented; 5. Community Engagement methods discussed in the CAAP should be honest; and 6. Denser housing/infill doesn't necessarily result in quantifiable GHG reductions; this is not discussed in the CAAP. Additional details about these concerns are in the attached letter, and we have more concerns than these to share with you. When you receive our letter, please contact the following representatives to set up a meeting about our concerns: Jennifer Holden at : jenholden100@gmail.com and Kathy Les at: kathy.les321@gmail.com Thank you - Jennifer Holden and Kathy Les</p>
<p><b>Upload File(s)</b></p>	<p>CAAP Neighborhood Response Letter 2022_07_30.pdf</p>

July 30, 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 July 1 Climate Action and Adaptability Plan (CAAP) preliminary draft that was released on July 1, 2022. The following list highlights some of our concerns we would like to address with this office while the next draft of the CAAP is being prepared:

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6. Denser housing/infill doesn't necessarily result in quantifiable GHG reductions; this is not discussed in the CAAP.

Additional details about these concerns are in the attached letter, and we have more concerns than these to share with you. When you receive our letter, please contact the following representatives to set up a meeting about our concerns:

**Kathy Les**

Sierra-Curtis Neighborhood Association board  
member



**Jennifer Holden**

Mangan Park Neighborhood Association lead



Sincerely, The Neighborhood Associations and Individuals Listed Below:

**The Neighborhood Associations**

East Sacramento Community Association\*

East Sacramento Preservation Neighborhood  
Association

Land Park Community Association

Mangan Park Neighborhood Association

Meadowview Neighborhood Association

Norlto Neighbors-United

Old North Sacramento Community Association

Robla Park Community Association

Sierra Curtis Neighborhood Association

Woodlake Preservation Neighborhood Association

**Individuals**

Lauren Hammond, Former Councilmember, District 5

Ron Brasel, Cabrillo Park, President of Meadowview Urban Tree Project, Sacramento Active Transportation Commissioner

Jeffrey Lidicker, Board Member of Sacramento Area Bicycle Advocates, Committee Member of Freeport Transportation Safety Committee

Richard Falcon – resident of Deerfield/Mesa Grande Neighborhood

Kerry Freeman – resident of Elmhurst Neighborhood

Richard Hernandez – resident of Newton Booth Neighborhood

Mikaili Kamau - resident of Meadowview and business owner

\*with additional comments to be delivered under separate cover.

July 30, 2022

**To: Jennifer Venema and Laila Atalla of the Climate Action and Sustainability Office**

Neighborhood leaders from seven neighborhood associations have reviewed the 400+ pages of the CAAP. We have shared concerns that:

**1. Sacramento's tree canopy must be adequately supported by city policies (currently it is not) to result in attaining carbon sequestration goals (Ch. 5, 6, and 10);**

Trees are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.

In order to preserve and expand Sacramento's tree canopy, the CAAP should:

A. Include a robust plan for protecting and growing the entire tree canopy, including in less affluent neighborhoods where there are currently fewer trees. While programs to improve carbon-sequestration potential on city parks and property is helpful, 80% of our trees are under private care, mostly in residential front and backyards.

B. Include a concrete plan for protecting the canopy from the effects of densification through development coordinated through the CAAP, the Housing Element, and General Plan 2040, rather than a vague statement of "preserving and incorporating shade trees in connection with higher density development." Creating a right to densification in R-1 zones that allows for cutting down trees to build ADUs, duplexes, triplexes and fourplexes will both eliminate yard space that supports carbon sequestration and recharges ground water AND create holes in the city's tree canopy, especially when such projects are clustered, creating urban heat islands.

C. Preserve urban open space, including yards, and permeable surfaces which are also important for carbon sequestration and to ensure that the ground water trees need is recharged.

D. Prevent, as much as possible, public and private tree removals, a conservation measure that is much less costly and impactful on residents than the requirement to electrify. It takes years for a young tree to provide the shade and carbon sequestration of larger more mature tree. Title 17 of the City Code and the tree ordinance in Title 12 should harmonize to contain objective standards on tree removals.

E. Consider programs that allow a tree to continue to sequester carbon at the end of its life cycle, rather than going to a landfill, such as the Sacramento Tree Foundation's Urban Wood Rescue Program. <https://www.urbanwoodrescue.com/>

**2. Funding financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed (mostly Ch. 8):**

a. There is an absence in the CAAP of the policies and plans describing the finance methods the City will use for the infrastructure upgrades towards 100% electrification of all buildings. We recommend that more details be provided regarding how the City plans to financially support CAAP implementation at all social and economic levels – especially lower-income residents.

a. While this draft contains a substantial section describing the differences between public and private funding sources, there is no actual information about the ways that public and private funding will be used to finance the implementation of CAAP methods and infrastructure. We request that specifics about public and private funding sources and plans be included in the next CAAP draft to reassure the public that CAAP implementation will be affordable to lower-income residents.

- 3. Reducing GHG through electrification of existing buildings should be more thoroughly presented for analysis, including financial impacts on lower income individuals and businesses (Ch. 6):**
- A) The City’s plans are contingent on a set of assumptions outlined in SMUD’s 2030 Zero Carbon Plan. What assurances do we have that SMUD will be our only ready source for secure, completely carbon-free electricity?
  - B) What is the timeline and strategy for the proposed electrification of 25% of the existing buildings between now and 2030? And subsequently from 2030 to 2045?
  - C) How will the City assure that mandating electrification of existing buildings does not result in more evictions? Many lower income homeowners and renters are already barely holding onto their housing, a situation made worse by recent inflation. Corporations are buying up houses and apartments and can use building electrification as a means of evicting tenants and increasing rents.
  - D) Why not more emphasis on local rooftop solar rather than depending on long-distance solar farms?
  - E) How will the City control the creation of 30% of the new “living-wage” jobs in the infill areas? Especially considering that we are under ministerial review?
- 4. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented;**
- A) How will transportation needs of lower-income households be served by the proposed programs? In order to reduce vehicles trips, all income groups must be considered.
  - B) Have the pedestrian and bicycle master plans referenced on page 101 already been developed? (See TR 1-1 and TR 1-2 on page 101). If not, when?
  - C) What are the “changes in public transit technology and new programs over the next 10-20 years [that will] provide new opportunities and resources”? (See page 102.)
  - D) What does the City plan to do to upgrade public transit and make it safe for passengers?
- 5. Community Engagement methods discussed in the CAAP should be accurately interpreted (Ch. 4):**
- A)** In one place support for a CAAP target was extrapolated from a question, while it was admitted in several footnotes that the results were “not statistically representative of the Sacramento community at-large.” (See footnotes 2-5, pp. 44-45, 48.). How is this a useful survey?
  - B)** In a different example, residents were asked: “Would you consider converting your homes to all-electric appliances if they don't cost you more and function as well as gas appliances?” (p. 44) How is a response to “consider” electrification also a commitment to “support” a city-wide switch from gas to electric appliances?
- 6. Denser housing/infill doesn't necessarily result in quantifiable GreenHouse Gas (GHG) reductions, which is not discussed in the CAAP:**
- A) In some cases, infill growth may support CAAP goals, yet produces no quantifiable GHG savings demonstrated in the CAAP. So why does the CAAP move forward with caution in responding to the climate crisis, while the City supports aggressive density increases in response to a housing crisis? (Ch.5/sec, Timeframe p73. Note Table 5-2.)
  - B) The City of Sacramento has already passed the Housing Element that seeks to promote densification with infill development in both commercial and residential areas while also putting new projects under ministerial review. The Housing Element, Land Use Element, and CAAP should contain information that support the goals of each element.

## Helen Selph

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**From:** Jennifer Venema  
**Sent:** Friday, July 29, 2022 3:16 PM  
**To:** Climate Action Plan; Helen Selph  
**Subject:** FW: Comments on Climate Action and Adaption Plan  
**Attachments:** CAAP NA Response Letter 2022\_07\_24.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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**From:** Save Sacramento Neighborhoods <[REDACTED]>

**Subject:** Comments on Climate Action and Adaption Plan

As an organization concerned with preserving and protecting Sacramento's livability and its existing single family neighborhoods, we echo the concerns raised in the attached letter and also add these concerns that need to be addressed in the Climate Action and Adaptation Plan:

1. The CAAP must address the impact of drought on Sacramento's climate, including but not limited to:
  - Initiating a comprehensive study on Sacramento's carrying capacity; Sacramento may in fact need growth limits to ensure that existing residents and businesses will have enough water.
  - Programs to maximize rain water absorption rather than drainage directly to the City's rivers. Keeping the ground water recharged helps protect city trees and also keeps street pollution out of the rivers.
2. The CAAP should consider lower-cost provisions to reduce GHG not dependent on state or federal funding including:
  - An immediate ban on gas powered leaf blowers and mowers; funds should be made available to assist low income gardeners to purchase zero-emission leaf blowers and mowers.



- Prohibit or significantly restrict conversion of yards to hardscape and encourage more [carbon absorbing yards](#) in both existing and new construction.
- Require use of concrete substitutes in sidewalks, driveways and walkways, reducing use of carbon-intense cement.
- Promoting energy conservation in every way possible.

A written response to these concerns is appreciated.

Thank you.

July 23, 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 want to begin a conversation between this office and the neighborhoods of Sacramento regarding the Climate Action and Adaptability Plan (CAAP) preliminary draft that was released on July 1, 2022. The following list highlights some of our concerns we want to address with this office while the next draft of the CAAP is being prepared:

- 1) Sacramento's tree canopy must be adequately supported by city policies to result in attaining carbon sequestration goals;
- 2) Funding, financing, and equity concerns in implementing the greenhouse gas (GHG)-reduction measures should be more adequately developed;
- 3) Reducing GHG through electrification of existing buildings should be more thoroughly presented for analysis, including financial impacts on lower income individuals and businesses;
- 4) Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented;
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- 6) Denser housing/infill doesn't necessarily result in quantifiable GHG reductions; this is not discussed in the CAAP.

Additional details about these concerns are in the 2 pages that follow. When you receive our letter, please contact the following representatives to set up a meeting about our concerns:

**Kathy Les**

Sierra-Curtis Neighborhood Association board  
member



**Jennifer Holden**

Mangan Park Neighborhood Association lead



Sincerely,

July 23, 2022

**To: Jennifer Venema and Laila Atalla of the Climate Action and Sustainability Office**

Neighborhood leaders from seven neighborhood associations have reviewed the 400+ pages of the CAAP. We have shared concerns that:

**1. Sacramento's tree canopy must be adequately supported by city policies (currently it is not) to result in attaining carbon sequestration goals (Ch. 5, 6, and 10);**

Trees are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.

In order to preserve and expand Sacramento's tree canopy, the CAAP should:

- A.** Include a robust plan for protecting and growing the entire tree canopy, including in less affluent neighborhoods where there are currently fewer trees. While programs to improve carbon-sequestration potential on city parks and property is helpful, 80% of our trees are under private care, mostly in residential front and backyards.
- B.** Include a concrete plan for protecting the canopy from the effects of densification through development coordinated through the CAAP, the Housing Element, and General Plan 2040, rather than a vague statement of "preserving and incorporating shade trees in connection with higher density development." Creating a right to densification in R-1 zones that allows for cutting down trees to build ADUs, duplexes, triplexes and fourplexes will both eliminate yard space that supports carbon sequestration and recharges ground water AND create holes in the city's tree canopy, especially when such projects are clustered, creating urban heat islands.
- C.** Preserve urban open space, including yards, and permeable surfaces which are also important for carbon sequestration and to ensure that the ground water trees need is recharged.
- D.** Prevent, as much as possible, public and private tree removals, a conservation measure that is much less costly and impactful on residents than the requirement to electrify. It takes years for a young tree to provide the shade and carbon sequestration of larger more mature tree. Title 17 of the City Code and the tree ordinance in Title 12 should harmonize to contain objective standards on tree removals.
- E.** Consider programs that allow a tree to continue to sequester carbon at the end of its life cycle, rather than going to a landfill, such as the Sacramento Tree Foundation's Urban Wood Rescue Program.  
<https://www.urbanwoodrescue.com/>

**2. Funding financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed (mostly Ch. 8):**

- There is an absence in the CAAP of the policies and plans describing the finance methods the City will use for the infrastructure upgrades towards 100% electrification of all buildings. We recommend that more details be provided regarding how the City plans to financially support CAAP implementation at all social and economic levels – especially lower-income residents.
- While this draft contains a substantial section describing the differences between public and private funding sources, there is no actual information about the ways that public and private funding will be used to finance the implementation of CAAP methods and infrastructure . We request that specifics about public and private funding sources and plans be included in the next CAAP draft to reassure the public that CAAP implementation will be affordable to lower-income residents.

- 3. Reducing GHG through electrification of existing buildings should be more thoroughly presented for analysis, including financial impacts on lower income individuals and businesses (Ch. 6):**
- A)** The City’s plans are contingent on a set of assumptions outlined in SMUD’s 2030 Zero Carbon Plan. What assurances do we have that SMUD will be our only ready source for secure, completely carbon-free electricity?
  - B)** What is the timeline and strategy for the proposed electrification of 25% of the existing buildings between now and 2030? And subsequently from 2030 to 2045?
  - C)** How will the City assure that mandating electrification of existing buildings does not result in more evictions? Many lower income homeowners and renters are already barely holding onto their housing, a situation made worse by recent inflation. Corporations are buying up houses and apartments and can use building electrification as a means of evicting tenants and increasing rents.
  - D)** Why not more emphasis on local rooftop solar rather than depending on long-distance solar farms?
  - E)** How will the City control the creation of 30% of the new “living-wage” jobs in the infill areas? Especially considering that we are under ministerial review?
- 4. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented;**
- A)** How will transportation needs of lower-income households be served by the proposed programs? In order to reduce vehicles trips, all income groups must be considered.
  - B)** Have the pedestrian and bicycle master plans referenced on page 101 already been developed? (See TR 1-1 and TR 1-2 on page 101). If not, when?
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- 5. Community Engagement methods discussed in the CAAP should be accurately interpreted (Ch. 4):**
- A)** In one place support for a CAAP target was extrapolated from a question, while it was admitted in several footnotes that the results were “not statistically representative of the Sacramento community at-large.” (See footnotes 2-5, pp. 44-45, 48.). How is this a useful survey?
  - B)** In a different example, residents were asked: “Would you consider converting your homes to all-electric appliances if they don't cost you more and function as well as gas appliances?” (p. 44) How is a response to “consider” electrification also a commitment to “support” a city-wide switch from gas to electric appliances?
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- A)** In some cases, infill growth may support CAAP goals, yet produces no quantifiable GHG savings demonstrated in the CAAP. So why does the CAAP move forward with caution in responding to the climate crisis, while the City supports aggressive density increases in response to a housing crisis? (Ch.5/sec, Timeframe p73. Note Table 5-2.)
  - B)** The City of Sacramento has already passed the Housing Element that seeks to promote densification with infill development in both commercial and residential areas while also putting new projects under ministerial review. The Housing Element, Land Use Element, and CAAP should contain information that support the goals of each element.

## Helen Selph

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**From:** Jennifer Venema  
**Sent:** Friday, July 29, 2022 11:43 AM  
**To:** Elmhurst Neighborhood Assoc; Laila Atalla; Greg Sandlund; Climate Action Plan  
**Cc:** Eric Guerra; Koy Saeteurn; Madeline Grigsby; publiccomment@cityofsacramento.org; Mayor Steinberg; Helen Selph; Matt Hertel  
**Subject:** RE: Comments on Climate Action and Adaption Plan  
**Attachments:** CAAP NA Respomse Letter 2022\_07\_24.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you for your comments on the draft CAP. I am including the project team on this email.

Best,  
Jennifer

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**From:** Elmhurst Neighborhood Assoc <elmhurstneighborhoodassoc@gmail.com>  
**Sent:** Friday, July 29, 2022 11:34  
**To:** Jennifer Venema <JVenema@cityofsacramento.org>; Laila Atalla <LAtalla@cityofsacramento.org>; Greg Sandlund <GSandlund@cityofsacramento.org>  
**Cc:** Eric Guerra <EGuerra@cityofsacramento.org>; Koy Saeteurn <Ksaeteurn@cityofsacramento.org>; Madeline Grigsby <MGrigsby@cityofsacramento.org>; publiccomment@cityofsacramento.org; Mayor Steinberg <mayorsteinberg@cityofsacramento.org>  
**Subject:** Comments on Climate Action and Adaption Plan

We echo the concerns of other neighborhood associations as expressed in the attached letter.

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Please notify us of any follow-up meetings with the City to discuss these concerns.

Elmhurst Neighborhood Association

(If you do not receive a prompt reply, please email: [president@elmhurstna.com](mailto:president@elmhurstna.com))

July 23, 2022

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## Helen Selph

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**From:** Save Sacramento Neighborhoods <savesacramentoneighborhoods@gmail.com>  
**Sent:** Sunday, July 24, 2022 4:37 PM  
**To:** Greg Sandlund; Mayor Steinberg; Angelique Ashby; Sean Loloee; Jeff S. Harris; Katie Valenzuela (City); Jay Schenirer; Eric Guerra; Rick Jennings; District8  
**Cc:** Jennifer Venema; Laila Atalla; Climate Action Plan; publiccomment@cityofSacramento.org; Save Sacramento Neighborhoods; Aimee Hernandez  
**Subject:** Needed changes for the Climate Action and Adaption Plan

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

\* Recognize that urban open space and trees are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.

\* Call for the restriction of upzoning and densification projects, including in existing single family neighborhoods. Creating a right to densification in R-1 zones that allows for cutting down trees to build ADUs, duplexes, triplexes and fourplexes will both eliminate yard space that supports carbon sequestration and recharges groundwater AND create holes in the city's tree canopy, especially when such projects are clustered, creating urban heat islands.

Sincerely,

**Full Name:** Aimee Hernandez

[REDACTED]

[REDACTED]



**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Concerns regarding the Climate Action & Adaption Plan

Deleting R-1 and also trees is a mistake that we will dearly pay for in the future. Without land for growth, children to play, trees to provide shade and character, we will be just another City, lacking in anything but crowded streets, buildings, etc.. If we wanted to have a city without trees and people living on top of each other, we would move to LA or SF.

Plan for the future not for destroying the future.

Sincerely,

Art Taylor  
[REDACTED]

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Needed revisions for the Climate Action and Adaption Plan

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Sincerely,

Carrie Marvin Gallo

**Helen Selph**

---

**From:**

Historic McKinley [REDACTED]

[REDACTED] list serve message on the Climate Action Plan

To: Sacramento Planning Department, Mayor and City Council

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

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*Friends & Neighbors of McKinley Park*

A neighborhood organization promoting historic preservation in Sacramento

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods <[REDACTED]>

**Subject:**

Needed revisions for the Climate Action and Adaption Plan

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

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Sincerely,

Joel Brown

**Helen Selph**

---

**From:** [REDACTED]  
**Sent:** Saturday, July 23, 2022 9:09 AM  
**To:** Climate Action Plan  
**Subject:** Climate Action & Adaption Plan Comment

Sent from my iPhone

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods <[REDACTED]>

**Subject:**

Needed revisions for the Climate Action and Adaption Plan

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

\* Recognize that urban open space and trees are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.

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Sincerely,

Kerry Freeman



**Helen Selph**

---

**From:**

Leisa Peterson [REDACTED]

**To: Sacramento Planning Department, Mayor and City Council**

The recently released preliminary Climate Action and Adaptation Plan (CAAP) needs to be revised to:

- Protect urban open space and trees that are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.
- Restrict upzoning and densification projects, including in existing single-family neighborhoods. Creating a right to densification in R-1 zones that allows for cutting down trees to build ADUs, duplexes, triplexes, and fourplexes will adversely eliminate yard space that supports carbon sequestration and recharges groundwater AND will create holes in the city's tree canopy, especially when such projects are clustered, creating urban heat islands.

Just some common sense.....

Leisa Peterson

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

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Sincerely,

Maggie Coulter

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

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Sincerely,

Nola Boyer

[REDACTED]

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Needed revisions for the Climate Action and Adaption Plan

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Sincerely,

Pj balsley  
[REDACTED]

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Request for changes to the Climate Action and Adaption Plan

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

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Sincerely,

Read and Zoe Harrison

[REDACTED]

[REDACTED]

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Needed revisions for the Climate Action and Adaption Plan

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

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Sincerely,

Sara Peña

[REDACTED]

**Helen Selph**

---

**From:**

Save Sacramento Neighborhoods [REDACTED]

**Subject:**

Needed changes to the Climate Action and Adaption Plan


To Whom it May Concern!

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

- Protect urban open space and trees that are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.
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Respectfully,

[REDACTED]

<b>Full Name</b>	<b>First Name:</b> Jennifer <b>Last Name:</b> Holden
<b>Email</b>	
<b>Message</b>	<p>Dear Jennifer Venema and Laila Atalla of the Climate Action and Sustainability Office, I want to begin a conversation between this office and the neighborhoods of Sacramento regarding the July 1 Climate Action and Adaptability Plan (CAAP) preliminary draft that was released on July 1, 2022. The following list highlights some of my concerns I want to address with this office while the next draft of the CAAP is being prepared: 1. There is no Urban Forestry Master Plan as discussed in the CAAP; 2. Funding, financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed; 3. More air quality monitoring is needed in low-resource areas of Sacramento to be certain we are reaching our GHG-reduction goals equitably; 4. Aligning the CAAP with CEQA-streamlining measures is detrimental to the health of Sacramento residents; 5. Reducing GHG through electrification of existing buildings should be more thoroughly presented for -analysis, including financial impacts on lower income individuals and businesses; 6. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented; 7. Community Engagement methods discussed in the CAAP should be accurately interpreted; and 8. Denser housing/infill doesn't necessarily result in quantifiable GHG reductions; this is not discussed in the CAAP. Additional details about these concerns are in the attached letter, and I have more concerns than these to share with you. When you receive my letter, please contact me to set up a meeting about these concerns: Sincerely, Jennifer Holden Mangan Park Neighborhood Association lead jenholden100@gmail.com manganparkna@gmail.com 916-391-8577 P.S. - please also see another letter I submitted on behalf of the Neighborhood CAAP Reviewer's group on 7/30/22. There is overlap between this letter and the Neighborhood CAAP Reviewer's letter, but there are some notable differences, too.</p>
<b>Upload File(s)</b>	CAAP MPNA Letter 2022_07_30.pdf



July 30, 2022

**To: The City of Sacramento Climate Action and Sustainability Office**

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

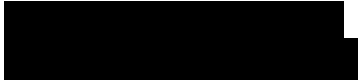
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1. There is no Urban Forestry Master Plan as discussed in the CAAP;
2. Funding, financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed;
3. More air quality monitoring is needed in low-resource areas of Sacramento to be certain we are reaching our GHG-reduction goals equitably;
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5. Reducing GHG through electrification of existing buildings should be more thoroughly presented for -analysis, including financial impacts on lower income individuals and businesses;
6. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented;
7. Community Engagement methods discussed in the CAAP should be accurately interpreted; and
8. Denser housing/infill doesn't necessarily result in quantifiable GHG reductions; this is not discussed in the CAAP.

Additional details about these concerns are in the attached letter, and I have more concerns than these to share with you. When you receive my letter, please contact me to set up a meeting about these concerns:

Sincerely,

Jennifer Holden  
Mangan Park Neighborhood Association lead

  
916-391-8577

P.S. - please also see another letter I submitted on behalf of the Neighborhood CAAP Reviewer's group on 7/30/22. There is overlap between this letter and the Neighborhood CAAP Reviewer's letter, but there are some notable differences, too.

July 30, 2022

**To: Jennifer Venema and Laila Atalla of the Climate Action and Sustainability Office**

Please consider the following concerns about the preliminary draft of the Climate Action and Adaptability Plan:

**1. There is no active Urban Forestry Master Plan as discussed in the CAAP.**

In 2017, the City initiated the Urban Forest Master Plan (UFMP) 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.

Yet, the UFMP is mentioned in the CAAP preliminary draft in at least the following 3 locations:

Pg. 123 (Ch.6) - Key Performance Indicators - A. Achieve 25% urban tree canopy cover by 2030 consistent with the Urban Forestry Master Plan.

pg. 124 (Ch. 6) - CS-1.1: Implement the Urban Forest Master Plan with a goal to achieve 25% urban canopy cover by 2030 and 35% by 2045

pp. 300-301 (pp. 42-43 of Appendix C)

CS-1.1 "implement the Urban Forest Master Plan with a goal to achieve 25% urban canopy cover by 2030 and 35% by 2045."

And where one would expect the CAAP to discuss the City's UFMP implementation plans under Ch. 10 – Municipal GHG Reduction Measures, there is no mention of the UFMP, not even under MM- 6 -Improve carbon sequestration potential of municipal parks, greenspace at City properties, and street tree planters in the public right-of-way.

In the next draft of the CAAP, please either do not refer to the UFMP at all because it is not an active plan, or (preferably) complete a draft of the UFMP, conduct the 45-day review period of the UFMP, and pass the UFMP before the next draft of the CAAP is released – and in this case, please include UFMP implementation within Chapter 10 – Municipal GHG Reduction Measures as it's own Municipal Measures.

**2. Funding, financing, and equity concerns in implementing the GHG-reduction measures should be more adequately developed (Ch. 8):**

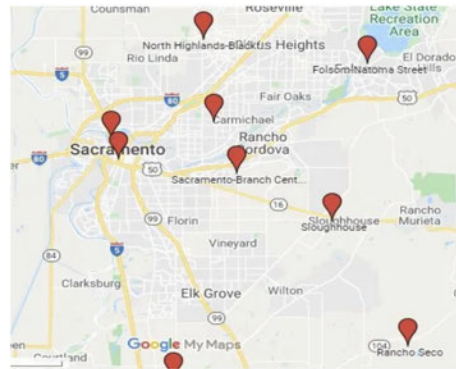
There is an absence in the CAAP of the policies and plans describing the finance methods the City will use for the infrastructure upgrades towards 100% electrification of all buildings. We recommend that more details be provided regarding how the City plans to financially support CAAP implementation at all social and economic levels – especially lower-income residents.

While this draft contains a substantial section describing the differences between public and private funding sources, there is no actual information about the ways that public and private funding will be used to finance the implementation of CAAP methods and infrastructure . We request that specifics about public and private funding sources and plans be included in the next CAAP draft to reassure the public that CAAP implementation will be affordable to lower-income residents.

Policy means nothing without financing to support it. Please tell us how these city-implemented GHG-reduction measures will be funded.

**3. More air quality monitors are needed in low-resource and industrial areas to be certain we are achieving our GHG-reduction goals equitably.**

The below graphic shows the current location of federal-enforcement air quality monitors that publicly-report PM2.5 within the Sacramento Metropolitan Air Quality Management District (SMAQMD):



**Location of Federal Regulation Air Quality Monitors in the County**  
*(none in South Sacramento)*

Notice there are 'holes' in the monitor network where there is the most ethnically-diverse, low-resource areas and industrial activity in both the North Area and the South Area. For instance, there is no SMAQMD publicly-reported air monitor between T St. and Elk Grove. The entire South Area where over a hundred thousand people live has no publicly-reported air quality monitors in the SMAQMD system.

Please work with SMAQMD to install EPA-enforced, publicly-reported air quality monitors across the South Area as a part of implementing the CAAP GHG-reduction measures. We need monitors reporting our PM2.5 and ozone levels in every part of Sacramento so we can tell if we are meeting our GHG-reduction targets. The low-resource and industrial sections of North- and South Sacramento are in need of monitoring, and without publicly-reported monitoring in these areas, there is no equity in any GHG-reduction measures.

**4. Aligning the CAAP with CEQA stream-lining measures is detrimental to the health of Sacramento residents.**

**pg. 132** - “This chapter (Ch. 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.”

I am very concerned about the environmental impacts of CEQA streamlining. Why does a policy statement about improving GHG-emissions also state that CEQA-streamlining is part of it's CAAP alignment? Here's a recent example in South Sacramento to consider that highlights this dichotomy:

One recent city infill development in the South Area is the \$5 million dollar compressed natural gas (CNG) fueling station for city garbage trucks at 2812 Meadowview Rd that was finished in December 2021. CNG is known to be highly explosive and to leak dangerous levels of methane. No EIR was conducted for this project in a residential area, and as stated above, there is no air quality monitoring for

miles around. To date, the City also has not created a hazard mitigation plan or evacuation plan for neighborhoods surrounding the fueling station. You can hear city staff discuss the CNG fueling station in a 1 hour recorded zoom meeting at: [https://www.youtube.com/watch?v=O\\_LqrS9dPKw](https://www.youtube.com/watch?v=O_LqrS9dPKw). In this video recorded on Nov. 5, 2021, a city staff member is asked why there was no EIR for a project with a highly combustible product and is also known to leak methane. The staff member was not able to give a CEQA citation for the exemption. And he also told this member of the public not to worry about methane levels because it is a naturally occurring substance....

The CNG fueling station for garbage trucks is right next door to the 102 acres just purchased by the City for \$12.3 million to act as a homeless safe ground/affordable housing/youth athletic park.

There are other ways to get some idea of the GHG emissions in the area of the CNG fueling station despite the lack of publicly-reported air quality monitors - the US EPA 2020 EJScreen and the CalEnviroScreen 4.0 have some useful GHG information:

The US EPA's 2020 EJScreen at: <https://ejscreen.epa.gov/mapper/mobile/index.html>. reports that the area within a half mile of 3100 Meadowview Rd to be at or above 90% more toxic than other areas in both California and across the entire US in the following categories:

- particulate matter (PM 2.5);
- ozone;
- air toxics cancer risk;
- respiratory hazards index; and
- facilities with the potential for a chemical accident within 5 km requiring a risk management plan - also known as RMP potential.

The California State EnviroScreen 4.0 (<https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>) says the census tract for 3100 Meadowview Rd. scores overall in the 74th percentile for environmental hazards state-wide. That means that according to the State of California, 26% of California census tracts are more polluted than 3100 Meadowview Rd. , and 73% of census tracts are less polluted. You can verify this information at <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40> and enter '3100 Meadowview Rd. Sacramento, CA' to use the mapping tool.

Clearly, this area had dangerous levels of GHGs **before** the City built a CNG fueling station in a low-resource, industrial area.

The recently-passed Sacramento Housing Element suggests that area surrounding the CNG fueling station is well-positioned for significant redevelopment of approximately 3,000 new housing units over the next 10 years, or approximately 10,000 additional residents. (See the Housing Element's Vacant and Underutilized Parcel Inventory for the details.) It can be assumed that any redevelopment plans will be under the CEQA stream-lining processes, in a low-resource, multi-ethnic section of town that already has considerable respiratory problems and no publicly-reported air-quality monitoring of PM2.5 or ozone.

For the next draft of the CAAP, please have the CAAP address in detail the City's plan to rigorously apply CEQA for all future development plans to promote the health of all it's residents, regardless of race or income. Based upon the very real example above, to say that the City is going to simultaneously reduce GHG and adopt CEQA-streamlining measures sounds like the CAAP is proudly announcing that Sacramento is going one step forward and then 3 steps back in improving the health of Sacramento residents.

- 5. Reducing GHG through electrification of existing buildings should be more thoroughly presented for analysis, including financial impacts on lower income individuals and businesses (Ch. 6):**
- A) The City’s plans are contingent on a set of assumptions outlined in SMUD’s 2030 Zero Carbon Plan. What assurances do we have that SMUD will be our only ready source for secure, completely carbon-free electricity?
  - B) What is the timeline and strategy for the proposed electrification of 25% of the existing buildings between now and 2030? And subsequently from 2030 to 2045?
  - C) How will the City assure that mandating electrification of existing buildings does not result in more evictions? Many lower income homeowners and renters are already barely holding onto their housing, a situation made worse by recent inflation. Corporations are buying up houses and apartments and can use building electrification as a means of evicting tenants and increasing rents.
  - D) How will the City control the creation of 30% of the new “living-wage” jobs in the infill areas? Especially considering that we are under ministerial review?
- 6. Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented;**
- A) How will transportation needs of lower-income households be served by the proposed programs? In order to reduce vehicles trips, all income groups must be considered.
  - B) Have the pedestrian and bicycle master plans referenced on page 101 already been developed? (See TR 1-1 and TR 1-2 on page 101). If not, when?
  - C) What are the “changes in public transit technology and new programs over the next 10-20 years [that will] provide new opportunities and resources”? (See page 102.)
  - D) What does the City plan to do to upgrade public transit and make it safe for passengers?
- 7. Community Engagement methods discussed in the CAAP should be accurately interpreted (Ch. 4):**
- A)** In one place support for a CAAP target was extrapolated from a question, while it was admitted in several footnotes that the results were “not statistically representative of the Sacramento community at-large.” (See footnotes 2-5, pp. 44-45, 48.). How is this a useful survey?
  - B)** In a different example, residents were asked: “Would you consider converting your homes to all-electric appliances if they don't cost you more and function as well as gas appliances?” (p. 44) How is a response to “consider” electrification also a commitment to “support” a city-wide switch from gas to electric appliances?
- 8. Denser housing/infill doesn't necessarily result in quantifiable GreenHouse Gas (GHG) reductions, which is not discussed in the CAAP:**
- A) In some cases, infill growth may support CAAP goals, yet produces no quantifiable GHG savings demonstrated in the CAAP. So why does the CAAP move forward in responding to the climate crisis, while the City supports aggressive density increases in response to a housing crisis? (Ch.5/sec, Timeframe p73. Note Table 5-2.)
  - B) The City of Sacramento has already passed the Housing Element that seeks to promote densification with infill development in both commercial and residential areas, while also putting all current and future building projects under ministerial review. The next draft of the CAAP should include more information about the ways that the City will meet it's goals and targets given a ministerial review process.

## Helen Selph

---

**From:** cpgp <[REDACTED]>  
**Sent:** Monday, July 25, 2022 4:19 PM  
**To:** Greg Sandlund; Climate Action Plan; publiccomment@cityofsacramento.org  
**Cc:** Mayor Steinberg; Angelique Ashby; Sean Loloee; Jeff S. Harris; Katie Valenzuela (City); Jay Schenirer; Eric Guerra; Rick Jennings; District8  
**Subject:** City's Climate Action Plan must limit densification and increase protection, preservation of Trees in residential neighborhoods and throughout the City

To: Sacramento Planning Department, Mayor and City Council

The recently released preliminary Climate Action and Adaptation Plan (CAAP) must be revised to:

- Recognize that urban open space and trees are critical in addressing climate action and ensuring livability in Sacramento because they sequester carbon, reduce energy use needed for cooling, provide street shade conducive to biking and walking, improve water quality, improve air quality and provide habitat.
- Call for the restriction of upzoning and densification projects, including in existing single family neighborhoods. Creating a right to densification in R-1 zones that allows for cutting down trees to build ADUs, duplexes, triplexes and fourplexes will both eliminate yard space that supports carbon sequestration and recharges ground water AND create holes in the city's tree canopy, especially when such projects are clustered, creating urban heat islands.

**Citizens for Positive Growth & Preservation (CPGP)** In support of **Save Sacramento Neighborhoods**

July 29, 2022



**Climate Action and Adaptation Plan Preliminary Draft, Comments by Trees for Sacramento to the City of Sacramento Climate Action Team**

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 is vitally dependent 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.

In response, and to advise of future public hearings, please communicate via email to [trees4sacto@sbcglobal.net](mailto:trees4sacto@sbcglobal.net); our postal address is 5601 Monalee Ave, Sacramento, CA 95819.

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 CO<sub>2</sub>e). 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 CO<sub>2</sub>e in 1 year. Alternatively, planting 17 new trees removes about 1 MT CO<sub>2</sub>e from the atmosphere over 10 years."

Removing trees likewise adds MT CO<sub>2</sub>e, but this plan fails to account for ongoing loss of tree canopy, resulting increases in MT CO<sub>2</sub>e, 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 costs...." 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?

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.

### **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.

**Please review our attachments for more detailed explanation of the comments made here.**

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Josh <b>Last Name:</b> Green
<b>Email</b>	████████████████████
<b>Message</b>	Please find A. O. Smith's comments attached.
<b>Upload File(s)</b>	Final 07.29.2022 AO Smith Comments to City of Sac CAP.pdf



July 29, 2022

City of Sacramento  
Sacramento City Hall  
915 I Street  
Sacramento, CA 95814

**RE: A. O. SMITH COMMENTS TO THE CITY OF SACRAMENTO ON THE PRELIMINARY PUBLIC REVIEW DRAFT CLIMATE ACTION PLAN**

A. O. Smith appreciates the opportunity to submit comments to the City of Sacramento (City) regarding the [Preliminary Public Review Draft Climate Action Plan](#) (CAP) that was released on July 1, 2022. The Preliminary Public Review Draft CAP identifies measures to reduce the City of Sacramento’s contribution to climate change while addressing the impact climate change has already had on the area. Our comments are limited to the draft measures for residential and commercial buildings.

**I. ABOUT A. O. SMITH**

A. O. Smith is a global leader applying innovative technology and energy-efficient solutions to products manufactured and marketed worldwide. Our company is one of the world's leading manufacturers of residential and commercial water heating equipment and boilers, as well as a manufacturer of water treatment and air purification products. Along with its wholly owned subsidiaries, A. O. Smith is the largest manufacturer and seller of residential and commercial water heating equipment, high efficiency residential and commercial boilers, and pool heaters in North America.

As a leading manufacturer of both residential and commercial heat pump water heaters (HPWHs), A. O. Smith has a keen interest in the Preliminary Public Review Draft CAP. The path to achieving carbon neutrality will require a number of changes in California. HPWHs will play a vital role in two key California policy priorities – reducing the carbon footprint of our buildings as the state transitions water heaters from primarily gas-fired to electricity and helping to manage the integration of increasing amounts of renewable energy as HPWHs may shift load and serve as thermal energy storage devices.



## **II. MEASURE E-2: ELIMINATE NATURAL GAS IN NEW CONSTRUCTION**

The Draft CAP includes a measure to develop and adopt an electrification ordinance that requires all new construction under four stories to be all-electric by 2023 and all construction to be all-electric by 2026. While A. O. Smith is supportive of the City taking this direction from the Mayors' Commission on Climate Change regarding new construction in buildings, it would recommend the City review the four story dividing line for the application of the proposed compliance dates in Measure E-2 and potential include a limited set of exemptions for hybrid solutions that may need to utilize natural gas for back up purposes in buildings that have heavy water heating loads.

## **III. MEASURE E-3: TRANSITION NATURAL GAS IN EXISTING BUILDINGS TO CARBON-FREE ELECTRICITY BY 2045**

In order to reach carbon neutrality across the entire building stock in California, massive investment will be required from both the public and private sectors, given California's current building and electric grid infrastructure. Measure E-3 creates a phased approach to electrifying these appliances, including limiting natural gas infrastructure expansion and eventually requiring new appliance installations to be all-electric through the permit process (Action E-3.1). Measure E-3 includes a support structure of information gathering, financial incentives, rebates, and educational programs to help residents and businesses replace their space and hot water heaters with electric alternatives and improve energy efficiency in the home through heat pumps, insulation, and air sealing (Actions E-3.2 through E-3.6). Incentives, rebates, and education programs will be coordinated through SMUD and focused on low-income community groups to reduce unintended costs to under-resourced communities (Actions E-3.3, E-3.5, and E-3.6).

A. O. Smith lends its support to the following measures:

- 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.
- E-3.5: Provide electrification retrofit incentives for space and water heating and investigate the development of programs like financing programs or metered energy efficiency.
- E-3.6: Continue to promote and incentivize electrification supportive energy efficiency in existing buildings including lighting, insulation, and air sealing upgrades through programs and financing mechanisms.

In regards to E-3.2 <sup>1</sup>A. O. Smith wants to highlight some key issues that should be looked at as E-3.2 is considered.

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<sup>1</sup> E-3.2: Develop an electrification ordinance for existing buildings/construction to be implemented through a building permit process to transition fossil fuels to electric following:

- Phase 1: 2023 → No new expansion of gas appliances or gas lines at existing buildings/construction
- Phase 2: 2026 → Require HVAC system replacements, new hot water heaters, and other appliances to be all-electric or utilize other low-carbon technologies

#### **IV. A. O. Smith Considerations in Regards to E-3.2 (Electric Ordinance for Existing Buildings)**

New building construction makes up a small percentage of all building stock in the state. In California, about 75 percent of homes (or 9.75 million) were built before 1990. Older homes are less likely to have adequately sized electric panels to accommodate all electric appliances.<sup>2</sup> In addition to the cost of the electric appliance, an older home may also require an electric panel upgrade. The California Energy Commission (CEC) estimates that a panel upgrade can cost between \$2,500 - \$4,000<sup>3</sup> and would likely be borne by the home or property owner. In a scenario where every house built before 1990 requires an electric panel upgrade, an investment between \$25 - \$40 billion dollars would be required. Another study on building electrification by the not-for-profit organization, [Pecan Street](#), found that it would cost approximately \$100 billion to upgrade electric panels in the residential sector across the country. Regardless of the exact amount, it's important to note that just one component of electrification, updating the main electrical panel of a home, will require a tremendous financial investment. The figures shared here do not account for the cost of upgrading electric appliances that in many cases are more expensive than their gas counterparts. According to the Building Decarbonization Coalition, the cost to electrify low-to-moderate income (LMI) households in California would require investments in the magnitude of \$72 - \$150 billion over the next several decades.<sup>4</sup>

The figures above are representative for statewide electrification. Nevertheless, it is critical that the City of Sacramento consider the economic impacts of retrofitting its households and commercial buildings and the need for sustained programs and incentives for property owners and businesses.

A. O. Smith's considerations related to E-3.2 come from Californian's need for a streamlined, easy-to-use program to assist homeowners and property owners in embracing electrification. Programs developed to incent customers to switch from gas water heaters to electric ones must be easy to use. Inspections of installations are critical to ensure that work was performed to required specifications and that appliances are working efficiently. Nevertheless, in-person inspections can further delay projects. A. O. Smith is encouraged that the City of San Jose has implemented an online permitting and inspection program for HVAC with heat pump technology which includes training for inspectors on heat pump technology installations so that they have the knowledge of what to look for in a quality heat pump installation. An online permitting process and remote inspections through virtual verification through pre and post pictures of installations should be considered by the City of Sacramento as it continues to build out its electrification programs.

Additionally, there is currently a shortage in California of plumbing contractors that have HPWH experience because the majority of water heating systems in California are gas-fired. The current pool of trained contractors and installers is limited which keeps the HPWH market from growing a consistent

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<sup>2</sup> California Energy Commission. *California Building Decarbonization Assessment - Final Commission Report*, August 13, 2021, pg 109.

<sup>3</sup> Building Decarbonization Coalition. [Towards an Accessible Financing Solution](#). June 2020, pg 14.

<sup>4</sup> CEC *California Building Decarbonization Assessment - Final Commission Report*, August 13, 2021, pg 84.

and stable workforce. As such, we recommend that local and state agencies work together to explore barriers to the market, including licensing requirements which can help to address the HPWH contractor shortage that many manufacturers see taking place currently.

Finally, the CEC assumes a turnover rate of 7 percent in water heaters in existing single-family homes and multi-family units, which equates to 861,000 water heaters being replaced annually.<sup>5</sup> To capture even 10 percent of this market means installing 86,000 units per year. The number of HPWH units sold annually across the entire country in 2020 was approximately 100,000.<sup>6</sup> To convert the entire annual California market of water heaters to HPWHs would require a ten-fold increase of nationwide HPWH manufacturing capacity. These figures are meant to illustrate that meeting California's demand for HPWHs at even a modest pace would require a significant ramp up of manufacturing and have vast impacts on the supply chain. This sort of increase takes time to orchestrate as new manufacturing capacity and production lines must be created. Therefore, having a clear and reliable policy scheme will be necessary to provide manufacturers with the business certainty needed to make the massive investments required to increase manufacturing capacity at this unprecedented scale.

## V. CONCLUSION

The transition away from utilizing natural gas for space and water heating, to electricity exclusively, presents significant challenges from funding and consumer awareness and acceptance to physical infrastructure and electricity grid modernization. A. O. Smith urges the City, State, and other local agencies to take a pragmatic, clear and reliable approach as they build upon greenhouse gas (GHG) reduction goals.

In addition to having consistent programs that provide incentives and consumer awareness and education on electric water heaters, we recommend that the City also focus on:

- Streamlining processes for installations;
- Providing manufacturers with the business certainty needed to make the necessary investments required to increase manufacturing capacity; and
- Continuing agency coordination to align federal, state, and local policies and rules to help achieve a smooth transition to reaching carbon neutrality.

We appreciate the opportunity to provide comments to the Preliminary Draft CAP. We look forward to continuing the dialogue and working with the City to design a program that helps achieve our GHG reduction goals as effectively as possible.

Sincerely,



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<sup>5</sup> *ibid.*

<sup>6</sup> ENERGY STAR® Unit Shipment and Market Penetration Report Calendar Year 2020 Summary, pg 6.

Joshua C. Greene  
Corporate Vice President, Government and Industry Affairs  
A. O. Smith Corporation  
[REDACTED]

<b>Full Name</b>	<b>First Name:</b> Erin <b>Last Name:</b> Teague
<b>Email</b>	████████████████████
<b>Message</b>	Please see the attached letter for comments from the Sacramento Association of REALTORS.
<b>Upload File(s)</b>	2022 0725 SAR Draft CAP Comments_CityofSac.pdf



July 25, 2022

Greg Sandlund,  
Planning Director, City of Sacramento  
915 I Street  
Sacramento, CA 95814

RE: Sacramento Association of REALTORS® Public Comment on the Preliminary Public Review Draft of the Climate Action Plan for the City of Sacramento

On behalf of the Sacramento Association of REALTORS® (SAR) and our 8,000+ members, we appreciate the opportunity to comment on the Preliminary Public Review Draft of the City of Sacramento's Climate Action Plan. We are grateful for our collaboration with staff and other stakeholders on this topic as it has moved through the Mayors' Commission on Climate Change to where we are today. Most importantly, we want to recognize the hard work of staff, especially Jennifer Venema, Climate Action Lead, who has taken the time to engage and work with our industry and members. Her dedication to this shows her commitment to learning and understanding how the Climate Action Plan will impact housing in our city and region.

We look forward to a continued conversation on how we find solutions to reduce greenhouse gas emissions in the built environment while maintaining a sustainable housing market that remains affordable so all our residents can achieve homeownership. As expected, our comments focus on Chapter 6 GHG-Reduction Measures and Actions, specifically the built environment section.

### **Action E-3.2 – Recommendations for Clarification and State Action**

We appreciate the recognition that the transition away from fossil fuels in the built environment is laid out in phases and considers the changing technologies in this area. We understand that implementing a requirement that appliances be all-electric or utilizing other low-carbon technologies is a vital and costly component of home electrification. However, the language as it is written for Phase 3, "provide enforcement [of Phase 1 & 2] with a permit compliance program," does not provide enough clarity about the kind of permit, how the permits would be enforced, and if the permits would only be required for new HVAC and/or water heating appliances. As with any permit program, there are always concerns about how permits are enforced and unintentionally deterring residents from using the permit process altogether, as they did with water heater replacements when strapping became required.

SAR recommends a more specific strategy to work with the state to implement this action. The ideal solution for homeowners is a state-funded program that replaces all gas-powered HVAC systems to eliminate such undue financial burdens on homeowners. While a state-funded program may be unlikely, if the requirement stating that contractors must install electric-powered only HVAC systems by the end of 2025 (as outlined in E-3.1) were to be implemented statewide the discriminatory aspect of the problem will resolve itself.





We understand the enormous pressure on local jurisdictions to reduce GHG rates. Still, we should note that if the City of Sacramento is the only city in our region that implements these strict requirements, you could be putting home values outside the city at an unfair market advantage over those within city limits. Instead, the City of Sacramento should be working with the State for action that phases out gas appliances throughout California. Without a statewide strategy, there will be confusion in the city about what rules apply in neighborhoods that rest around the border of city limits, or even more concerning, lower marketability of properties in the City of Sacramento versus other cities and unincorporated areas in California.

### **Action E-3.3 – Support Cost-Effective Programs that bring Value to Homeowners**

SAR understands the need to reduce greenhouse gas in our region at a reasonable investment rate for homeowners to protect their most valuable asset, their home. Since 2012, SAR has partnered with SMUD, Sacramento Air Quality Management District, and Rebuilding Together Sacramento (RTS) to create a very successful home insulation program. RTS was able to identify and help low-income homeowners insulate their homes for an average cost of \$250 a house. As a result, homeowners could save about \$300 per year on their energy bills with the additional benefit of reduced greenhouse emissions. Programs like this can help homeowners understand the need for reasonable home upgrades to help clean our air quality and save them money. SAR recommends pursuing plans that emulate the results of past strategies, which provided more significant incentives and return on investment for homeowners.

### **Action E-3.4 – Support Continued Partnership with SMUD with Education & Incentive Programs**

SAR understands that educational programs and incentives will be a critical tool to achieve the goals for the built environment. Additionally, SAR has had a long-standing partnership with SMUD to ensure our members are knowledgeable about the programs SMUD provides, as our members have direct contact with homeowners and potential homeowners every day. We commit to this partnership to bring more education to the residents in the City of Sacramento because we understand that most residents do not understand the complexities of electrification retrofits.

It is essential to understand that electrification retrofits are not top of mind for most homeowners, and many do not even know what home electrification means, which can create hesitancy to adopt new technology. There must be extensive communication, education, and a streamlined approach for the installation of these products. An easy example of this is when a homeowner's water heater goes out and needs to be replaced. It is often a project that can be completed in 24 hours. However, installing an electric heat pump is a process that can take 1-2 weeks under the best of circumstances. The new process now involves plumbing and electrical trades and can even mean new space requirements and placement in the home. We encourage you to consider an education program along with incentives, so residents have time to plan for larger-scale projects before appliances break down. We are always willing to engage in these educational efforts as our members often work with their clients on long-term home projects and cost projections to help partner in the communication and education of the new regulations.

Please keep in mind that as we approach all requirements, we want to ensure we are not further creating barriers for homeowners who wish to make greenhouse gas-reducing upgrades of any





size or magnitude. In addition, we need to help provide options for homeowners to incrementally make GHG-reducing upgrades for those that cannot afford to do it all at once.

**Action E-3.6 – Oppose the Use of PACE Loans**

While we understand that incentive and finance options are critical to the success of these actions, SAR has a long-standing policy to oppose the use of PACE loans. Traditionally, PACE loans are secured by the home and collected by the County as part of the property tax bills, meaning that if the property owner fails to make payments, it is possible to lose the home in foreclosure. If a homeowner still owes money on a PACE loan and decides to sell their home, the buyer will theoretically assume responsibility for the loan. However, most secondary lenders will not buy a new loan with a PACE loan encumbering the property, so the property needs to be paid off to allow escrow to close. This places an undue burden on homeowners by preventing them from being able to sell their homes before paying such loans that are tied to property taxes in full. Instead, we suggest that the city work to provide incentives for homeowners who need to finance these renovations through other means.

**Action E-3.7**

As a policy, SAR always supports full disclosure and values its role as a community partner in the City of Sacramento. Therefore, we look forward to working together to create more clarity for this action. Currently, there is no consistent methodology for evaluating a home's GHG emissions score. This could create various assessment options that lack a standard, impacting a home's value, when inconsistent methodology is used to establish ratings that would be published on competing homes. Therefore, implementing a consistent standard is critical and should no leave space for interpretation.

We hope to continue to be part of this critical conversation as a stakeholder in Sacramento and look forward to collaborating closely with staff to help meet the city's climate goals. Please contact Erin Teague with any questions at [eteague@sacrealtor.org](mailto:eteague@sacrealtor.org)

Thank you for your consideration,

A handwritten signature in cursive script that reads "Erin L. Teague".

Erin Teague  
Government Affairs Director  
Sacramento Association of REALTORS®

cc: Mayor Steinberg, City of Sacramento  
Councilmember Ashby, City of Sacramento  
Councilmember Loloee, City of Sacramento  
Councilmember Harris, City of Sacramento  
Councilmember Valenzuela, City of Sacramento  
Councilmember Schenirer, City of Sacramento  
Councilmember Guerra, City of Sacramento  
Councilmember Jennings, City of Sacramento  
Councilmember Vang, City of Sacramento  
Jennifer Venema, Climate Action Lead, City of Sacramento  
Steve Johns, Regional and Local Government Affairs Manager, SMUD





## Helen Selph

---

**From:** Joel S. Levy [REDACTED]  
**Sent:** Friday, July 29, 2022 3:02 PM  
**To:** Climate Action Plan  
**Cc:** Darrell Steinberg (City); Teague Erin; Dave Howe; Bob Greenspan  
**Subject:** Public Comments - 2022 Draft Climate Action & Adaptation Plan  
**Attachments:** ltr g sandlund.pdf

Please see the attached letter.

[Joel S. Levy](#)



[hefner-law.com](http://hefner-law.com)  
**HEFNER**  
LAW

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July 29, 2022

Sent via email to [CAP@cityofsacramento.org](mailto:CAP@cityofsacramento.org)

Gary Sandlund  
Planning Director  
City of Sacramento  
915 I Street  
Sacramento, CA 95814

Re: Preliminary Draft Climate Action Plan for the City of Sacramento

Dear Mr. Sandlund:

Our firm represents MetroList Services, Inc. (“MetroList”), which owns and operates a regional multiple listing service based in Sacramento, California. This letter is sent on behalf of MetroList to provide comments on the Preliminary Public Review Draft of the City of Sacramento's Climate Action & Adaptation Plan (the “Draft Plan”).

MetroList has been provided with a copy of the public comments on the Draft Plan recently submitted by Erin Teague, Government Affairs Director for the Sacramento Association of REALTORS (“SAR”). MetroList agrees with and supports SAR’s comments on the Draft Plan. MetroList especially wishes to state that it encourages a regional or statewide approach to mitigating and adapting to climate change. MetroList’s multiple listing service serves a large geographical area in central and northern California, and MetroList is concerned that implementation of measures by the City of Sacramento without similar action by surrounding cities and/or counties could inequitably affect home values and the marketability of homes within the City of Sacramento. Such localized measures could place real estate brokers, real estate salespersons and homeowners looking to market homes located within the City of Sacramento at an unfair disadvantage compared with those marketing homes outside the City’s limits, and MetroList believes a broader governmental approach to dealing with these issues should be pursued.

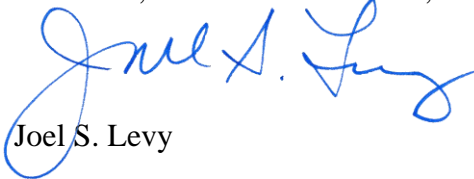
MetroList certainly appreciates the opportunity to provide comments on the Draft Plan and looks forward to further review and discussion of the best ways to reduce greenhouse gas emissions

Gary Sandlund  
July 29, 2022  
Page 2

in the built environment while fairly and reasonably impacting the housing market in our region and the State of California. If there are any questions concerning the foregoing, please do not hesitate to contact the undersigned or MetroList's President, David Howe.

Very truly yours,

HEFNER, STARK & MAROIS, LLP

By   
Joel S. Levy

JSL

Hon. Darrell Steinberg [MDSteinberg@cityofsacramento.org](mailto:MDSteinberg@cityofsacramento.org)

Erin Teague, SAR Government Affairs Director [eteague@sacrealtor.org](mailto:eteague@sacrealtor.org)

David Howe, President, MetroList Services, Inc. [dhowe@metrolist.net](mailto:dhowe@metrolist.net)

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<b>Full Name</b>	<b>First Name:</b> SacMoves <b>Last Name:</b> Coalition
<b>Email</b>	████████████████████
<b>Message</b>	SacMoves Coalition respectfully submits the attached comments.
<b>Upload File(s)</b>	Comments Re Draft Preliminary City CAP_SacMoves_07_30_22.pdf

# SAC MOVES

WALK. BIKE. DRIVE. RIDE.

## Partner Organizations

2022 - 2023:

**350**  
sacramento

AARP

ACT



RiderShip for the Masses



SARA



Sacramento Regional Rail Working Group

Sacramento Splash

Sierra Club, Mother Lode Chapter

Sierra Club, Sacramento Group

SKK Enterprises

The 50 Corridor TMA

July 31, 2022

City of Sacramento

[CAP@cityofsacramento.org](mailto:CAP@cityofsacramento.org)

Submitted via City Portal

Subject: Comments on the Preliminary Public Review Draft of the Sacramento Climate Action Plan

SacMoves Coalition respectfully submits this letter in response to the City of Sacramento's request for comments on its Preliminary Public Review Draft of the Sacramento Climate Action Plan (CAP), a partial draft of the City Climate Action and Adaptation Plan (CAAP) to be released in the Fall. Overall, SacMoves Coalition appreciates the extensive effort by City staff to prepare the Draft CAAP, but is disappointed that the Draft CAAP:

- Lacks a sense of urgency
- Does not include the adaptation section
- Has no funding plan
- Insufficiently addresses issues of equity
- Fails to provide for robust accountability
- Ignores several of the key recommendations of the Mayor's Commission on Climate Change (MCCC)

SacMoves Coalition is a broad-based coalition of business, labor and community groups united behind a common vision that Sacramento should have an innovative, seamless, and diversified transportation network offering a wide range of accessible, affordable, and efficient mobility choices coupled with supportive land uses, better air quality, safer neighborhoods, and a stronger and more equitable economy.

As City Council has acknowledged, climate change constitutes an emergency. The City of Sacramento cannot afford to wait and see how other cities and the world's nations will respond to the need for urgent action. We can and we must do everything in our power locally to remove carbon and hold global warming at 1.5 degrees Celsius, while also doing what's necessary to adapt our region to the inevitable challenges of climate change.

In Sacramento, transportation is the largest source of greenhouse gas (GHG) emissions. Yet, our efforts to curb its impact on our environment remain woefully inadequate. At the same time, our transportation infrastructure decisions are too often made without necessary attention to issues of equity, safety, and livability.

This is the time for the City to take unprecedented, comprehensive, and bold action to transform transportation in the City and the region. Such a transformation is nonnegotiable if we are to begin to respond to the imminent threat of climate change; it is also essential in fostering equity, addressing traffic safety, increasing the livability of our neighborhoods, and improving air quality. Adoption of a comprehensive CAAP that provides specificity in actions and projects, a funding plan to ensure implementation, and ongoing accountability for meeting targets, is a crucial step in this process. The Draft CAAP does not rise to the challenge for the following reasons:

***Lack of sense of urgency:*** The City Council declared a climate emergency in December 2019. The ongoing failure to treat climate as a crisis is reflected in the preliminary plan's omission of key sections including adaptation and equity, the lack of a concrete funding/financing plan, and vague implementation timelines and measures.

***Failure to address adaptation:*** We are very disappointed that the draft does not address adaptation, especially in light of the City Manager's representation to the City Council's Budget and Audit Committee that a complete draft would be released on July 1. Adaptation measures are important for the entire city, and especially for our underserved communities. We urge you to release this important portion of the draft prior to the release of the second draft so that there is ample time for review and comment.

***Failure to address key MCCC Recommendations, including equity:*** We appreciate that some of the MCCC recommendations are used as a framework for the plan. However, the Commission also made important recommendations on Equity and on Foundational Principles (Urgency, Advocacy, Accountability, Education, Financial and Economic Sustainability). These are critical to developing and implementing a successful climate plan. The plan should include sections that directly address both Equity and the Foundational Principles recommended by the MCCC.

***No funding plan:*** The City's climate office has been understaffed and underfunded since inception. The preliminary draft is two years behind schedule and still incomplete. The City must take steps now to ensure that implementation begins right away. Appendix D, Funding and Financing Strategy, identifies the need for at least six new staff positions and \$3.2 billion in funding/financing. Although several options for funding are presented, there is no actual proposal or plan, and some of these options require legislation or voter approval which take substantial time. The final draft presented to the City Council must be accompanied by an actionable proposal for the necessary staffing and financial resources.

***Insufficient Accountability:*** As proposed, the Implementation and Monitoring proposal does not lay an adequate foundation to ensure accountability. At a high level, changes should be made to ensure a single centralized point of accountability, more frequent reporting to council, stronger specificity in the measures, and a more detailed implementation timeline.

Several of the member organizations of the SacMoves Coalition have provided detailed comments on the transportation sections of the Draft CAAP as part of a comprehensive

comment letter submitted by 350 Sacramento. In addition to our big-picture comments above, we support the transportation-specific comments in the 350 Sacramento letter and request that City staff review them carefully and incorporate responsive changes into the CAAP.

Thank you kindly for your attention to our comments.

SacMoves Coalition

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Inga <b>Last Name:</b> Olson
<b>Email</b>	██████████
<b>Message</b>	My comments are attached below.
<b>Upload File(s)</b>	22_7_30_SCC_CityCAAPpdf.pdf



## **ENVIRONMENTAL JUSTICE ISSUES ASSOCIATED WITH THE CAAP**

### **Specific Accountability Measure for Underserved Communities are Necessary**

The CAAP says resources must be prioritized for communities who have experienced the greatest inequities and one strategy it advocates to address inequities is to reduce the barriers to tree planting, maintenance and costs in disadvantaged communities. However, the accountability measure identified for this strategy is that there will be 25% urban tree cover by 2030. This measure does not address tree cover in underserved communities directly. Historically, an accountability measure that lumps underserved communities with the entire community has not benefited underserved communities.

### **The Climate Death Rate Accelerates Each Year We Wait**

Death rates from heat continue to increase and the 2030 target to increase the tree canopy is 8 years from now when Sacramento's climate will be dryer and hotter. This timeline is too slow especially considering that the tree canopy is one critical factor: (1) to reduce the heat island effect, including death from heat, in underserved communities, and (2) that this action is an important and repeated adaptation and sequestration strategy prioritized by the CAAP.

### **The Unsheltered Members of our Community**

The underserved communities have been and continue to be plagued by environmental pollution and extreme weather events, which have been accelerated and made worse by the warming climate. The hardest hit members of this broad underserved community are the unsheltered. Because the city and county do not have integrated disaster resilience budgets, plans, and actions to address these disasters made more frequent and large-scale due to global warming; people, specifically the unsheltered, continue to die at an alarming rate. The impacts and remedies to address climate change in relationship to the unsheltered are not addressed adequately in the CAAP.

## **THE CAAP TARGETS MUST BE ACCELERATED**

### **The Electrification of Existing Buildings: The Inadequacy of Attrition**

The CAAP indicates that Sacramento City's proposed ordinance for transitioning existing buildings/ construction from fossil fuel to electricity will be implemented through the building permit process based on attrition. The Webster's definition of the word attrition is a gradual change in the normal course of events. A theological definition is "repentance that is not perfect, because not prompted solely by sorrow for having offended God." Whichever way you look at attrition, it is inconsistent with the speed in the breakdown of natural systems that is resulting in flooding, wildfires, deaths and illness due to heat and poor air quality. Specifically, the targeting of the electrification of existing buildings by 2045 is "repentance for God's creation that is not perfect" because it is a change that is far too slow and too late and that will contribute to human suffering and the degradation of God's creation.

### **We Need Climate Targets Based on Current Science, not Old Laws**

It is ok to do our best and fail, but we believe Sacramento City leaders have the courage and capability to establish more authentic climate targets based on current science, not old laws. Utilizing the best scientifically current targets instead of stale targets based on past laws will educate the public accurately and will allow us all to acknowledge the truth regarding our rapidly changing climate. Truth is a powerful tool that informs everyone who cares to see it. Truth can unlock new actions by individuals, businesses, and organizations to contribute because of truly seeing the potential benefits of doing so and the costs of not moving rapidly.

## **TARGETS BASED ON THE LATEST SCIENCE AND CLEARLY SPELLED OUT PROJECT MILESTONES CAN SUPPORT THE COMMUNITY EDUCATIONAL EFFORT AND EXPEDITE ACTION**

### **Existing Buildings Electrification**

Regarding the conversion from fossil fuels to electricity of existing building structures, an effective and authentic campaign that informs and teaches people and organizations what they can do, specifically, and the likely impact of their actions, could have far-reaching and rapid

consequences. So many people are fearful knowing the environmental and human consequences of the warming climate. Real information could be a catalyst for Sacramentans to identify and take consequential actions that they themselves can make to green their homes and neighborhoods. People taking action helps to change fear to confidence and could result in a greater number of people and organizations in Sacramento making significant changes to reduce their carbon footprint.

### **Provide Targets and a Dashboard that Children & Adults Understand**

Proper, clear and well understood targets, that are easy to access, and that include regular updates that are meaningful to residents could help to expand the effectiveness of the planned CAAP education campaigns and workshops. These accessible targets and measures could be particularly motivating if they are broken down into measures for communities and neighborhoods where people and organizations can see the actual impact of their actions.

### **Green Underserved Communities**

At the same time clear and instructional information can help Sacramentans who can afford to electrify their homes and businesses or change their landscapes is happening; Sacramento must also simultaneously invest our common resources in greening underserved communities to withstand the climate extremes and find strategies and funds to address the increasing cost of living for the poor.

### **Extend Tenant Protection Ordinances, Etc.**

Tenant protection ordinances are due to expire in 2024 or 2025. As electrification and the greening of underserved communities occurs, specific ordinances must be continued or developed with the involvement of those impacted community members to ensure tenants are not evicted because landlords can get higher rents or can sell their structures for a higher dollar. Also, home owners in areas that benefit from climate redevelopment need protections to keep those neighborhoods affordable should market values increase.


### **Direct Install Programs should replace Incentives and Rebates in Low income Homes**

Incentives and rebates in low income communities should be replaced with direct install programs. Spending our common resources on electrifying low income homes addresses inequities, reduces GHG, and provides models of green communities that individuals or organizations including businesses with their own funds can emulate.

### **Government & Organizational Collaboration is a Must**

Furthermore, as we electrify and end the use of fossil fuels, we must transition Sacramento gas and oil workers and others whose areas of expertise can no longer be utilized to renewable industries where workers can retain comparable and living wages and benefits. Our local government must collaborate with State and Federal government, other local governments, unions and chambers of commerce to pool the resources and ingenuity necessary to catalyze these kind of businesses and training programs to expedite the transition away from fossil fuels.

###

<b>Full Name</b>	<b>First Name:</b> Nancy <b>Last Name:</b> McKeever
<b>Email</b>	
<b>Message</b>	<p>Comments (attached) are focused on Built Environment Measures E-1 through E-5. A very serious problem still not addressed and critical to the success of this plan is that the City's climate office has been understaffed and underfunded. The City is two years behind schedule and has not provided a Draft Climate Action and Adaption Plan. The forthcoming Draft document absolutely needs to be accompanied by a detailed assessment of the staffing and budget requirements and a detailed funding proposal to accomplish each Measure, including each specific task as subset of each Measure. Measure E-3 - In addition to efforts to promote and educate the public about building electrification, the City should create a youth education, job training, and equipment installation program - a local Climate Conservation Core - to bring electrification to homes and businesses. This is a triple win – youth employment in jobs for the future, healthier more comfortable homes, and progress toward GHG goals. To succeed in Measure E-5, the City will need to work closely with SACOG, SMUD and housing partners to develop and enforce the required infill growth measures. Equally important is the need to work with partners maintain consistency with Measure E-5 and defeat proposals including the Sacramento County Transportation Tax Initiative, that “loosen” land use and transportation regulations and open the doors for sprawl and the many disbenefits that come with it. Thank you, Nancy McKeever</p>
<b>Upload File(s)</b>	July 12 - 2022 Sacramento CAAP Prelim Draft Comments - Submitted.docx

# Comments on Climate Action and Adaptation Plan Preliminary Draft

## Chapter 6 – Built Environment Measures E-1 through E- 5

### General Comments –

This preliminary draft does not contain sufficient information to understand how built environment measures will actually be undertaken, how they will be coordinated with SMUD and other partners, and how progress will be measured and reported. As such, the following comments include suggestions for the actual draft document expected in the fall/winter timeframe.

**A very serious problem still not addressed is that the City’s climate office has been understaffed and underfunded.** The City is two years behind schedule and has not provided a Draft Climate Action and Adaption Plan. **The forthcoming Draft document absolutely needs to be accompanied by a detailed assessment of the staffing and budget requirements and a detailed funding proposal to accomplish each Measure, including each specific task as subset of each Measure.**

### **Measure E-1 - SUPPORT SMUD AS IT IMPLEMENTS THE 2030 ZERO CARBON PLAN**

Actions taken by SMUD account for virtually 50 percent of the carbon reductions accounted for in the City’s plan. The text of Measure E-1 says the city will support SMUD in the implementation of the 2030 Zero Carbon Plan but does not say how. In fact, the City, County, Air Quality Management District, SACOG, and SMUD have been coordinating efforts to electrify the built environment and implement Measures E-2 through E-5. **A consolidated summary of the tasks, schedule, budget, and funding plan of these entities should be part of Measure E-1 to establish the role of the City’s Built Environment efforts in the partnership.** All five entities need to be supporting each other. **Measure E-1 needs to clarify these “supportive” actions to give meaning to the plan. The success of electrifying the built environment and achieving the 90% infill growth consistent with the Sustainable Communities Strategy depends on this coordination being clearly stated and trackable.**

Measure E-1 should provide a schedule of the City efforts (E-2, E-3, E-4, E-5) alongside SMUD’s Carbon Zero implementation schedule to show how the City will support SMUD in real time to clarify coordination of actions, reduce delays to both City and SMUD efforts, and make progress accountable. The City’s schedule should also note the actions of the County, SACOG, and the AQMD as partners.

Discussions of GHG quantification are confusing in both the text and Appendix. Quantifying GHG reductions by measure is, by nature, complicated. The City should revise this important section, perhaps with graphics as needed, to clarify the GHG reduction between the actions of the City and SMUD, noting relevant contributions by other partners and shared reductions.

**It is important to make the point that efforts to electrify the built environment are only as valuable as the degree of success and pace at which SMUD removes GHGs from the electricity supply. Should their progress fall below plan, extra efforts will certainly need to be taken by both the City and SMUD. Similarly, it is important to note that the success of the City to secure the many climate benefits of infill growth from Measure E-5 is dependent on the City’s ability to maintain consistency with the regional Sustainable Communities Strategy and defeat attempts to permit sprawl development.**

## **Measure E-2 – ELIMINATE NATURAL GAS IN NEW CONSTRUCTION**

Does measure E-2 apply to all residential, commercial, and industrial new construction? Are there exceptions?

How will Measure E-2 be enforced? The city should coordinate its permitting program with SMUD to enforce efficiency minimums for all appliances, especially HVAC and water heating, to be permitted for installation and update these minimums yearly to capture technical advancement.

Action items should be added for implementation, utility coordination, and enforcement.

Performance indicators are needed to track how the City GHG reduction projections included in this report match with outcomes over time. For example, square feet of new construction by category over time and actual GHGs averted, matched against adopted goals that get the city to its expected GHG reductions by 2030 and 2045.

Performance indicators also should track evolving efficiency of installed HVAC, water heating, cooking, and other units by number of square feet, gallon, therms averted, and number of units over time to capture actual improved GHG reductions.

What does this mean – “to fully implement measure E-2, the city will conduct relevant community notification efforts prior to effectiveness in 2023, as required by the State?”

## **Measure E-3 – TRANSITION NATURAL GAS IN EXISTING BUILDINGS TO CARBON-FREE ELECTRICITY BY 2045**

Measure E-3 states that electrification of existing buildings is expected to occur incrementally after Phase 2 policy is adopted in 2026 as old gas appliances wear out and need to be replaced. If HVAC and water heating appliances last 10 – 20 years, sometimes longer, then this incremental “as needed” approach to replacement means that very many existing gas units will be operating well into 2040 and longer. Toward the end of life these units typically are even less efficient (dirtier and more expensive to operate) than when they were installed.

The sooner GHGs are averted, the greater the climate benefit. Even if SMUD achieves total electrification of their system, until equipment is replaced, benefits are not accrued. To speed replacement of natural gas equipment:

- The time has come for the City to adopt permitting requirements that require the replacement of gas units more than 10 years old or below a set efficiency level at time of sale or remodel.
- Require sellers of homes and commercial buildings to provide potential buyers with a statement of the fuel type, age, and efficiency of existing HVAC and water heating equipment, average annual cost to run existing equipment compared to current high-efficiency similar sized electrical options, and a summary of the city’s requirement to replace with electric after set year.
- Develop an incentive for surrendering gas HVAC and water heating appliances and incentives for buildings that completely turn off natural gas service.

Electrification benefits will be multiplied by enhanced building efficiency in all structures. **Early and aggressive emphasis on Measure E-3.3 is time and money well spent.** The city should consider working with entire neighborhoods or sections of a neighborhood to run a coordinated energy efficiency and electrification program, upgrading multiple buildings simultaneously. It can be used to educate the city-wide public about the benefits of electrification, speed implementation and cut costs if economies of scale are accessed.

**In addition to efforts to promote and educate the public about building electrification, the City should create a youth education, job training, and installation program - a local Climate Conservation Core - to bring electrification to homes and businesses. This is a triple win – youth employment in jobs for the future, healthier more comfortable homes, and progress toward GHG goals.**

Performance indicators can be improved and will help the public understand how this plan will be used to accomplish GHG reduction goals. Consider tracking the number of square feet of conditioned space, gallons of water, therms averted, and number of units (induction) installed by type of structure and area of city, per month, and level of efficiency. Track efficiency improvements and compare to technical best standards. This will allow the City to track how implementation is pacing with goal attainment and also could show the city where implementation is working best and where there are slowdowns or issues. Tracking youth employment hours or trade certifications achieved could be very good news.

What coordination and funding options exist to support the difficult task of electrifying existing buildings more completely and faster? Who are the partners the City can work with beyond SMUD? Improving the details in Measure E-1 as suggested will help in all other Measures.

#### **Measure E-4 – INCREASE THE AMOUNT OF ELECTRICITY PRODUCED FROM LOCAL RESOURCES AND WORK WITH SMUD TO INSTALL ADDITIONAL LOCAL STORAGE BY 2030**

Measure E-4 will benefit from the detailed, consolidated summary of the tasks, schedule, budget, and funding plan of the City with County, AQMD, and SMUD as discussed in these comments as part of Measure E-1. As is, this discussion, as the rest of the Preliminary Draft, shows intensions to “support” SMUD but does not deliver any specific actions on the part of the City.

- Key Performance Indicators. Who will pilot the local renewable energy project – City or SMUD?
- E-4.1 Way too general. How will city support this?
- E-4.2: Can this be more specific?
- E-4.3: Says that incentives have been created. What are they? When will they be on offer?
- E-4.4: Pilot completed? When? What? Where?

#### **Measure 5-5 – SUPPORT INFILL GROWTH WITH THE GOAL THAT 90% OF GROWTH IS IN THE ESTABLISHED AND CENTER/CORRIDOR COMMUNITIES AND 90% SMALL-LOT AND ATTACHED HOMES BY 2040, CONSISTENT WITH THE REGIONAL SUSTAINABLE COMMUNITES STRATEGY. PROJECT LEVEL VMT SHOULD BE 15% BELOW THE REGIONAL AVERAGE.**



Measure E-5 directs the City to take more and larger steps to robustly direct new growth into the infill locations. This Measure will reduce building electrical demand per capita and support attainment of climate goals. This Measure also has the co-benefits of conserving water, farmland, and open space, all actions which also contribute to reducing GHGs. Additionally, this Measure will reduce the cost of extending and maintaining electrical infrastructure, supporting SMUD and contributing to the successful attainment of Building Electrification efforts. These are long-term benefits that, along with reducing climate impacts, improve public health and safety and boost critically needed affordable housing and mobility.

**To succeed in Measure E-5, the City will need to work closely with SACOG, SMUD and housing partners to develop and enforce the required infill growth measures. Equally important is the need to work with partners to defeat proposals to “loosen” land use and transportation regulations that would allow future sprawl and the many disbenefits that come with it.**

<b>Full Name</b>	<b>First Name:</b> Kirk <b>Last Name:</b> Vyverberg
<b>Email</b>	████████████████████
<b>Message</b>	Please consider the attached community comments and concerns.
<b>Upload File(s)</b>	CAP Qs Section 5.docx

## **CAAP Strategies (Sec.#5/6) - Community Questions & Concerns**

29 July 2022

ATTN: City of Sacramento

Planning & Development Dept.

Submitted by LPCA, Land Use Committee

### **Review Principles**

**Balancing competing interests**

**Distributing cost & benefits equitably**

**Community & Municipal contribution sharing**

### **A Land Use & Transportation Nexus**

1. CAP GHG reductions depend on SMUD purchases of clean electrical energy. Does SB 100 provide a path to clean energy production for all of CA. - or is Sacramento benefiting from SMUD's "early adoption" at a cost to other CA cities' ability to source clean energy? How does SMUD's plan fit with California's plan?

SB100 is based on a path plan to achieve 100% renewables (solar & wind) energy sources for the state. However, this will require a land use commitment near equal to industrial agriculture. In order to avoid extreme land use replacement of agriculture, Cities must have policies that require roof-top solar and counties must have disturbed land reclamation agreements requiring solar and wind project placement. Studies show that the land use requirements for renewables equals the total land use of cities and existing fossil fuel development.

2. If there are challenges (land use, intermittent generation, and energy storage) and NO proven path to 100% clean electrical energy for the entire state, shouldn't Sacramento incorporate an Energy Conservation Strategy or limit growth to some of our development sectors?

The "clear path" in the CAAP depends on new technologies and ideas yet to come (HOPE). Given the Climate Crisis, the actions should include conservation through "sustainable growth" strategies and limitations in the 2040 GPU (ie: balanced infill densification with preservation goals, and step-wise intensification taken in a series of the five year GP updates). Caution should be exercised in the Land Use growth strategies in favor of more definitive Climate Actions. (See 6 below)

3. EV adoption and commercial building electrification provide the two largest contribution to Climate goals. Will all commercial warehouse structures be required to have rooftop solar and storage systems? How will we provide for the additional local energy storage systems SMUD requires to be 100% green?

Rooftop solar should be required on all urban commercial/industrial structures, including onsite energy storage.

4. What does it mean that communities Co-benefit from local development facilitated by a streamlined CEQA - a process originally established to gain the benefits of local public project review, now eliminated through a Master CAP Agreement?

Ministerial or streamlined project approvals lower costs, but also disengage community contributions of project vision and ownership. By reinstating local review, we contribute the “wisdom of the market” to product development?

5. Given that infill growth supports Climate goals, yet produces no quantifiable GHG emission savings, why does the CAP move forward with caution responding to the Climate Crisis, while the City supports aggressive density increases in response to a Housing Crisis?  
(Ch5/sec,Timeframe p73) Note Table 5-2

(See 2 above)

6. Given that community health can be dependent on green space and tree canopy (p.68); and, that 80% of the City’s existing canopy is located in private back yards, why is the City increasing housing density in a manner proposing to allow building lot coverage to increase from 50 to 75% - cutting back yard shade tree space in half?.

We should take Land Use intensification in steps: State mandates already increase lot coverage to 60% through exemptions for garages, ADUs and lot split duplexes. Let’s not go to 75% coverage required for multiplex construction. (See SACOG Best Practices)

## Transportation

7. What does the City plan to do with SacRT to make their services safe, reliable, and convenient connecting our infill corridors with both our Central City employment and our outlying industrial job centers? Can we overcome the loss of our large manufacturing centers like Proctor&Gamble and Campbell? How will this work with a new distributed service economy of home repair, delivery services and restaurant work?

We must look to other cities for a model linking industrial centers to residential workforce housing. Perhaps the answer can be found in Rapid Transit Bus systems (RTB) comprise of vans providing better frequency, routing flexibility and destination services.

8. Over 50% of households live on low-income levels. CAP goals include a 100% EV conversion by 2045 and only a 11% public transit modality share. How will Sacramento overcome the cost barriers to low income EV buyers who spend 17-36% of their income on transportation?

The answer to both subsidize better Public Transit and develop infill housing on Transportation Corridors, increasing our PT modality share above 11% through safer more reliable service - reducing the subsidy levels below that required for individuals EV conversions.

## Accountability

9. How will we distribute the costs? What will be paid by the City and by the Residents? What will this do to our taxes? What will this do to our ability to borrow money for emergencies in the future? Are there hidden or unintended costs? How do we look at the total costs of housing, electrification, and transportation subsidies?

We need a cost overview for the entire General Plan Update.

END

Kirk Vyverberg, Board Chair – Land Use  
Land Park Community Association



**COMMUNITY COMMENT & CONCERN**  
**Land Park Community Association**  
**30 July 2022**

**EXTREME DROUGHT – An Ecological Existential Crisis for California and Sacramento’s CAAP**  
**Inadequate Response**

**Q: Can Sacramento and California rely on a Climate Action Plan based on a Clean Electrification Strategy that assumes the continued availability of hydroelectric power and industrial solar production that uses dessert groundwater to keep cells clean and efficient?**

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

**A: Science, facts and common sense says otherwise.**

**CURRENT CONDITION**

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 needs.*  
*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.*

Kirk Vyverberg, Board Chair  
Land Use Committee





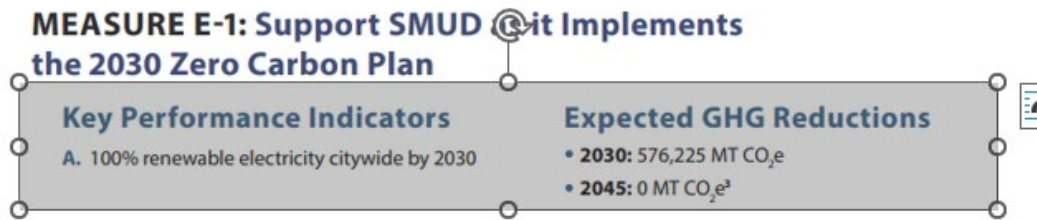
<b>Full Name</b>	<b>First Name:</b> Rosie <b>Last Name:</b> Yacoub
<b>Email</b>	██████████
<b>Message</b>	Please see comments attached from 350 Sacramento's electrification team
<b>Upload File(s)</b>	Built Environment_Electrification - Rick & Rosie (350 Sac).docx



# Comments on Climate Action and Adaptation Plan Preliminary Draft

## Chapter 6 – Built Environment Measures E-1 through E- 4

Rick Codina & Rosie Yacoub, 350 Electrification Team



**CAN THE CITY CLAIM THESE SAVINGS?** This CAAP measure calls for support of SMUD’s Carbon Zero Plan (CZP) which pledges to eliminate greenhouse gas emissions from its power supply by 2030. The CZP will accomplish this by staging the shutdown of the natural gas cogeneration power plants, followed by repurposing the Cosumnes power plant for hydrogen or biogenic fuels. This can only be accomplished by replacement power from renewable sources, including expansion of the Solano Wind facility, new renewables contracts and the addition of two major photovoltaic and storage farms now under consideration. It remains unclear what role the City can play in these efforts, and why the CAAP should be claiming full credit for SMUD’s resulting GHG savings. The City should not be relying on savings from SMUD to justifying delaying reductions within the City’s purview.

**HOW WERE THE GHG SAVINGS CALCULATED?** For background purposes, it would be useful for more detailed clarification on how the CAAP determined the 576,225 MT CO<sub>2</sub>e figure for CZP GHG savings. Until the adoption of its CZP, SMUD was adhering to the SB-100 mandate for 60% renewable power requirement by 2030. Under this regulatory scenario SMUD would be emitting 1.35 million metric tonnes (MT) of CO<sub>2</sub>e in that year<sup>1</sup>, which would be the SB-100 adjusted base of savings for the CZP. If we assume roughly 35% of that total can be attributed to the City of Sacramento<sup>2</sup>, the E-1 measure “savings” would be around 472,500 MT, which is 20% lower than what the CAAP reports.

<sup>1</sup> Prior to the adoption of the CZP in 2021, SMUD set the original SB-100 goal of 1.35 million metric tons GHG for 2030 in its Integrated Resource Plan in October 2018 under Strategic Directive 9 (SD-9). The CZP zeroed out this original goal.

<sup>2</sup> The California Department of Finance estimated around 33% of the County’s population lived in the City of Sacramento in 2022

State/County/City	Total Population	
	1/1/2021	1/1/2022
Sacramento	1,580,624	1,576,618
Sacramento	518,322	518,037
City as Pct of County	32.8%	32.9%

: Department of Finance Demographic Research Unit

## **Measure E-2 – ELIMINATE NATURAL GAS IN NEW CONSTRUCTION**

We congratulate the City adopting the new construction all-electric building ordinance which takes effect in 2023 as part of the first-year Mayors' Commission on Climate Change recommendations. If exemptions are limited in scope, this will be a great first step towards eliminating the use of natural gas in the City.

## **Measure E-3 – TRANSITION NATURAL GAS IN EXISTING BUILDINGS TO CARBON-FREE ELECTRICITY BY 2045**

**TIMELINE.** We support the timeline proposed in the draft CAAP, with no expansions of gas lines beginning in 2023 and required electrification of existing gas appliances on replacement starting in 2026. This approach is not only quite possible, but necessary for successfully meeting E-3's goals for 2030.

**EDUCATION.** E-3.4 Initiate an educational program during the permitting process, aimed at contractors and building/homeowners, on the available incentives and other benefits of electrification. The program should also encourage permit applicants for remodels to consider panel upgrades and wiring to prepare for future electrification additions. Additionally outreach should be done to the realtor community.

**STREAMLINING.** E-3.5 Streamline the permit process for the installation of heat pump and induction appliances. This will reduce the time required by both contractors and City staff and **act as an incentive** to promote the voluntary replacement of gas appliances with electric alternatives before mandatory replacement takes effect in 2026.

**PERMIT COMPLIANCE AT TIME OF SALE.** E-3.2 The California Energy Commission reports state-wide permit compliance for HVAC and water heaters at only around 10%. With so many equipment replacements escaping permitting, the City should focus on increasing the permit capture rate as a means of encouraging more electrification. SMUD requires permit compliance to be eligible for its lucrative incentives, but many installations still occur in the City and County without permitting, often with a homeowner not even knowing that permitting is required.

Adopt enforceable Building Code requirements that will ensure that all electrification replacements are permitted when required, followed by mandatory permit certification at time of sale. This approach would be similar to the resale program in the City of Davis. This course of action will require expanding the permitting staff to better manage the needed increased workload, with the added costs offset by enhanced permit fees.

Another measure that could bolster adoption of electric equipment would be to require replacement of any gas equipment of a certain age (10-15 year), at time of sale. This would not

impact as many replacements as the City’s proposed requirement to convert to electric beginning in 2026, but could be a way to bring more awareness to building and home owners beforehand.

**ENVIRONMENTAL JUSTICE.** We support the Council-directed advisory committee’s framework for environmental justice in implementing electrification of existing buildings. Lower-income City households would benefit most from the bill savings attributable to electric equipment. Moreover at least half of City households are renters<sup>3</sup>. This would dictate an approach that leverages the City’s unique Rental Inspection Services to educate landlords about the advantages and eventual requirements to electrify. The City should also launch additional educational efforts focusing on landlords, apartment house owners and low-income energy assistance providers such as Community Resource Project.

**Measure TR-3.1: amend city building code to require more EV charging capacity**

The measure in the current CAAP is the same as the one adopted in 2021, and is weaker than what will soon be required at the State level. To amend this ordinance, the City should adopt stronger EV charger requirements which would include having every unit in multi-family residential have access to charging, some at Level 1 (access to regular 110 V outlets) with a percentage, available to all residents, at Level 2. This effort should be done in concert with the rest of the NBE requirements which start in 2023.

**TRACKING AND MEASUREMENT.** Measure E-3 sets a 28% reduction in GHG from natural gas by 2030 (or 119,000 MT) and 74% by 2045. For its part, SMUD codified its building electrification goals in its Strategic Directive 9, approved April 2021:

*“Pursue energy efficiency and electrification to reduce carbon emissions by 365,000 metric tons from buildings ...in 2030 (the equivalent of 112,000 single family homes”*

Again, scaling this value to the City’s approximate 35% share, SMUD’s goal for the City comes to around 128,000 MT, which is reasonably close to the CAAP’s estimate for 2030. Even so, it would be very helpful to see more detailed modeling of the forecast savings, particularly the expected equipment capture rate. For the approximate 200,000 households in Sacramento<sup>4</sup>

<sup>3</sup> The 2017 American Community Survey indicated that 51.4% of City householders lived in rental housing. 2017 American Community Survey (1-year estimates)

Geographical Unit	Estimated Housing Units				
	Occupied Housing Units	Owner-occupied		Renter-occupied	
		Number	Percent	Number	Percent
Sacramento City	189,193	91,978	48.6%	97,215	51.4%

<sup>4</sup> From the California Department of Finance:

**Table 2: E-5 City/County Population and Housing Estimates, 1/1/2020**

City	HOUSING UNITS					
	Total	Single Detached	Single Attached	Two to Four	Five Plus	Mobile Homes
Sacramento City	198,971	118,991	13,098	18,869	44,819	3,194

and a 15-year equipment life, the turnover rate for HVAC and water heaters would be around 13,000 – 15,000 replacement units annually. But a review of 2018 permit data, excerpted in Figure 1, confirmed far fewer than this expected volume of equipment replacements and even smaller number of reported electric changeouts. This finding further emphasizes the need for more robust permit certification and enforcement.

With some refinement the City’s permit database could prove a valuable tool for tracking equipment changeouts to electric. But it would have to be combined with other metrics that estimate the overall percentage capture rate compared to the total equipment in the existing building stock, combined with information on dwelling types and vintage that can be used to estimate GHG savings. Appendix A provides an example of this type of modelling. It illustrates a scenario for a 36% potential reduction in GHG by 2030 given gas furnace replacement with heat pumps that increase after a presumed ordinance in 2026.

**Total GHG From Space Heating**

All Units


	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas furnance	318,821	316,839	314,389	308,981	296,003	279,780	261,394	241,926	220,295
Plus Orig HP	17,367	15,196	13,025	10,854	8,684	6,513	4,342	2,171	-
New heat pumps	1,462	1,740	1,979	2,547	3,762	4,438	4,179	2,736	-
<b>Total</b>	<b>337,650</b>	<b>333,775</b>	<b>329,394</b>	<b>322,383</b>	<b>308,448</b>	<b>290,730</b>	<b>269,915</b>	<b>246,833</b>	<b>220,295</b>
<b>Pct reduced:</b>	<b>3.5%</b>	<b>4.6%</b>	<b>5.9%</b>	<b>7.9%</b>	<b>11.9%</b>	<b>16.9%</b>	<b>22.9%</b>	<b>29.5%</b> 	<b>36.0%</b>

Figure 1. 2018 City of Sacramento HVAC and Water Heater Permit Extracts, Showing Level of Available Detail for Report Tracking

Project Name	Electric	Gas	Not known	Grand Total
Electric to electric 30 gallons	2			2
Electric to electric 52 gallons	3			3
Gas - 65 gallon to Electric Solar assisted- 065 gallon	1			1
100 gallon to tankless			1	1
20 gallons			1	1
30 gallons			56	56
38 gallons			1	1
40 gallon			1	1
40 gallon electric	1			1
40 gallon Gas to 52 gallon electric			1	1
40 gallons			605	605
40 gallons Electric to Electric			1	1
40 gallons Gas to 52 gallons electric			2	2
40 gallons gas to 52 gallons gas			1	1
40 gallons Gas to electric tankless			1	1
40 gallons gas to tankless			2	2
40 gallons to tankless			7	7
40 gallons x 2			1	1
50 Gallon electric to electric	1			1
50 gallon gas to Heat pump	2			2
50 gallon gas to tankless			1	1
50 gallons			351	351

Category	Type	Project Name	Total
<b>HVAC</b>			
	Commercial	Heat pump	1
	Commercial	Package unit	1
	Commercial	Wall furnace	1
	<b>Commercial Total</b>		<b>3</b>
	Residential	Condenser coil only	183
	Residential	Ducts only	100
	Residential	Furnace only	142
	Residential	Ground mount	77
	Residential	Heat pump	2
	Residential	HVAC C/O	555
	Residential	Mini split	73
	Residential	Package unit	22
	Residential	Roof mount	422
	Residential	Split system	1720
	Residential	Wall furnace	8
	Residential	Whole House Fan	8
	Residential	(blank)	2
	<b>Residential Total</b>		<b>3314</b>

**Measure E-4 – INCREASE THE AMOUNT OF ELECTRICITY PRODUCED FROM LOCAL RESOURCES AND WORK WITH SMUD TO INSTALL ADDITIONAL LOCAL STORAGE BY 2030**

**PROVIDE MORE DETAIL ON SOLAR AND BATTERY SUPPORT.** Measures E 4.1 through 4.3 are a vague cluster of recommendations in support of local solar and storage systems that demand more detail on how the City specifically will be working with SMUD. For its part, in June SMUD launched “My Energy Optimizer”, a pilot program that provides incentives for combined solar and battery storage at customer sites. At minimum, the City could be surveying its own buildings and land for adding solar and batteries to participate in this program. And they could

develop streamlined permitting and incentives to assist City households that want to participate.

<https://www.smud.org/en/Going-Green/Battery-storage/Homeowner>

**DEVELOP DETAILED PLAN FOR 1 MW SOLAR PROJECT.** Measure E-4 recommends City involvement in a 1 MW community solar project with SMUD. This would be a front-of-the-meter installation where the generated output would be sold directly to SMUD. Given SMUD's long opposition to community solar, this could be a significant precedent, depending upon the structure of the agreement. The E-4 wording suggest that the City could simply be providing a site for a SMUD developed photovoltaic project, with the energy credits provided directly to the City.

**CONSIDER ASSISTING TRUE COMMUNITY SOLAR PROJECTS.** We recommend that the City also consider helping to develop a true Community Solar project working with non-profit developers, such as Grid Alternative or the Community Resource Project (CRP). Such projects have an *environmental justice (EJ) focus* since the solar credits can be allocated to low-income renters for example. CRP, for example, has been attempting unsuccessfully for years to have SMUD support a 5 MW community solar proposal for the Franklin Boulevard area.

In non-SMUD areas, the utilities are required by law (SB 43) and CPUC regulation to allow non-utility developers build up to 20 MW community solar projects, with quotas allocated throughout the state. The City of Davis, which helped initiate the original law, has been granted 20 MW for community solar and has entered into lease agreements to begin developing. Moreover, the utilities have a required EJ allocation; PG&E, for example, must set aside 45 MW in its service territory for EJ community solar (see Figure 2).

Figure 2. PG&E’s Allocated Community Solar Requirements

**Pacific Gas and Electric Company  
Solar Choice Request for Offers**

**II. Solicitation Target**

PG&E is seeking to procure 176.15 MW in the Unreserved and EJ categories per [D. 21-12-036](#). The table below shows a break down of the remaining megawatts for each category. :

**Table 2: GTSR Program and Project Capacity Limits**

Category	Capacity Allocation (MW)	Remaining Capacity (MW)	Target for Spring 2022 Solar Choice RFO (MW)
Unreserved	207	152.6	Up to 152.6
EJ Reservation	45	43	Up to 43
City of Davis	20	20	0
<b>Total</b>	<b>272</b>	<b>215.6</b>	<b>176.15 between Unreserved and EJ</b>

**Appendix Example of Heat Pump HVAC Modelling**

Note: This rough model was created by Rick Codina while serving on the Built Environment Task Force of the Sacramento Mayors' Climate Commission in 2019.

The tables shown here represent a scenario where heat pumps replace gas furnaces at a modest level, but then increase dramatically in 2026 when a presumed ordinance takes effect requiring all electric replacement equipment. By 2030, the percentage reduction in greenhouse gas (GHG) reaches 36.0%.

Furnace and Heat Pump Weighting Factors for Energy Use and GHG  
City of Sacramento

House Type	Pct Distribution				Annual Energy Use		First year lbs/C02		Weighted Energy Use and GHG					
	Vintage	Sq ft	Size	Vintage	Weighted	Furnace (Therms)	Pump (kWh)	Furnace	Heat Pump	Furnace (Therms)	Heat Pump (kWh)	Replacement Furnace	Heat Pump	Savings
Pre-1978	1,500	75%	59%	44%	409	4,510	4,787	(1,977)	182	2,005	(2,129)	879	(1,249)	
R-11 Ceiling	2,100	12%	59%	7%	504	5,819	5,898	(2,552)	36	421	(427)	185	(242)	
Insulation	2,700	13%	59%	8%	724	8,858	8,474	(3,884)	55	678	(649)	297	(351)	
1978	1,500	75%	15%	12%	495	2,959	5,786	(1,298)	57	342	(669)	150	(519)	
R-19 Ceiling	2,100	12%	15%	2%	337	4,006	3,947	(1,757)	6	75	(74)	33	(41)	
Insulation	2,700	13%	15%	2%	398	4,881	4,653	(2,140)	8	97	(93)	43	(50)	
1992	1,500	75%	9%	7%	243	2,708	2,843	(1,187)	16	177	(186)	78	(108)	
R-19 Ceiling	2,100	12%	9%	1%	314	3,636	3,674	(1,595)	3	39	(39)	17	(22)	
Insulation	2,700	13%	9%	1%	360	4,313	4,211	(1,891)	4	48	(47)	21	(26)	
2001	1,500	75%	16%	12%	205	2,333	2,404	(1,023)	25	288	(297)	126	(171)	
R-19 Ceiling	2,100	12%	16%	2%	261	3,092	3,058	(1,356)	5	62	(61)	27	(34)	
Insulation	2,700	13%	16%	2%	292	3,610	3,421	(1,583)	6	77	(73)	34	(39)	
<b>Weighted Average:</b>					100%					<b>405</b>	<b>4,310</b>	<b>(4,743)</b>	<b>1,890</b>	<b>(2,853)</b>

Annual HVAC Turnover and Heat Pump Replacement  
City of Sacramento

	Initial Pct	Turnover	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas Heat	77.3%	10,055	9,308	9,134	8,916	7,541	4,022	2,514	1,508	1,006	-
Original Electric Heat	22.7%	2,945	2,945	2,945	2,945	2,945	2,945	2,945	2,945	2,945	2,945
Gas to Heat Pump	0.0%	-	747	921	1,139	2,514	6,033	7,541	8,547	9,050	10,055
<b>Total</b>	<b>100.0%</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>	<b>13,000</b>
New heat pumps as pct of original gas			7.4%	9.2%	11.3%	25.0%	60.0%	75.0%	85.0%	90.0%	100.0%
Total heat pumps as pct of total			28.4%	29.7%	31.4%	42.0%	69.1%	80.7%	88.4%	92.3%	100.0%

Total Number of Units by Heat Type  
City of Sacramento

	Total Units	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas Heat	150,766	148,208	147,286	146,147	143,633	137,600	130,059	121,512	112,462	102,407
Original Electric Heat	44,151	44,151	44,151	44,151	44,151	44,151	44,151	44,151	44,151	44,151
New Heat Pump	0	2,558	3,479	4,618	7,132	13,165	20,707	29,254	38,304	48,359
<b>Total</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>	<b>194,917</b>

	Initial Pct	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas Heat	77.3%	76.0%	75.6%	75.0%	73.7%	70.6%	66.7%	62.3%	57.7%	52.5%
Original Electric Heat	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%	22.7%
New Heat Pump	0.0%	1.3%	1.8%	2.4%	3.7%	6.8%	10.6%	15.0%	19.7%	24.8%
<b>Total Heat Pumps</b>		<b>24.0%</b>	<b>24.4%</b>	<b>25.0%</b>	<b>26.3%</b>	<b>29.4%</b>	<b>33.3%</b>	<b>37.7%</b>	<b>42.3%</b>	<b>47.5%</b>

Total GHG From Space Heating

All Units

	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas furnance	318,821	316,839	314,389	308,981	296,003	279,780	261,394	241,926	220,295
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New heat pumps	1,462	1,740	1,979	2,547	3,762	4,438	4,179	2,736	-
<b>Total</b>	<b>337,650</b>	<b>333,775</b>	<b>329,394</b>	<b>322,383</b>	<b>308,448</b>	<b>290,730</b>	<b>269,915</b>	<b>246,833</b>	<b>220,295</b>
<b>Pct reduced:</b>	<b>3.5%</b>	<b>4.6%</b>	<b>5.9%</b>	<b>7.9%</b>	<b>11.9%</b>	<b>16.9%</b>	<b>22.9%</b>	<b>29.5%</b>	<b>36.0%</b>



<b>Full Name</b>	<b>First Name:</b> Alexander <b>Last Name:</b> Aruj
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>Hello Team, Plastic waste and single use disposable items need to be called out specifically in our plan to better safeguard our public health, air and water. Make Sold Waste MM-4 goals more specific. Single use plastics are one of the most common item found in our streets and environment, which I understand costs multi-millions of dollars per year to clean up, so let's work together whether by city ordinance or purchasing power to reduce this source. Consider the below as part of the provisioning guidelines when it comes to avoiding plastic waste.</p> <ol style="list-style-type: none"><li>1. Monitor and report on plastic waste sources and identify stakeholders on how to reduce by replacing with reusable items, as needed</li><li>2. Report on quantities that are being recovered from the environment.</li><li>3. Work with all foodware vendors to encourage a purchasing plan of more reusable foodware items</li></ol> <p>Plan for foodware venues - reusable and recyclable purchasing to minimize disposable waste streams, e.g. concert venues, outdoor arenas or stadiums, buildings. For Sacramento to reach the next level of environmental stewardship the plan should address the health and climate issues created by the plastics and single use disposables.</p> <ul style="list-style-type: none"><li>- Make a point to follow the guidance of experts and cities around the world to reduce single-use plastic, charging a fee to discourage its use where possible, without incurring hardship to vendor/consumer</li><li>- Disposable Foodware reductions controls need to be put in place and regulated so our vendors and community and parks depts can transition safely from a single-use system to a reuse system - this avoids the material from entering our water, ground or air, including the waste stream, and gumming up solid waste system machines</li></ul> <p>See table 3, page 23 of attached Charleston, SC Climate Action Plan 2021 for an example of rough task breakdown to reduce plastics. We don't necessarily need an additional audit on plastic waste, mainly a plan to reduce waste as Beyond Plastics, Upstream and Rethink Disposable have done in their reports. See attached playbook. Thanks City CAP Team! Thank you</p>

<b>Full Name</b>	<b>First Name:</b> Andrew <b>Last Name:</b> McLeod
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>We should be making a long range plan (i.e. 100-year plan) to move development out of places that will flood the worst. That starts with stopping new construction in such places or designing for floods (garage or shaded outdoor space only on ground floor, with elevated living space). Natomas, the Pocket, Land Park and yes, most of downtown are unsustainable. Downtowns generally are obsolete so we should redistribute the city center(s). There is lots of underdeveloped high ground, including some of Sac's original waterfronts on the American River. It will be hugely expensive but possible with the right timeframe. Will be even more expensive if we wait until nature forces us to move.</p>

## Helen Selph

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**From:** Ann Amato [REDACTED]  
**Sent:** Saturday, July 30, 2022 12:23 PM  
**To:** Climate Action Plan; Chris Brown; goli sahba; Douglas MacPherson; Jane Lamborn; Megan Shumway; Stephen Roberts; Anabel Crouch  
**Subject:** Feedback on the City's CAAP 1st Draft

Dear Mayor Steinberg and City Staff:

I am a member of the Sacramento Climate Coalition and a County resident. What the City of Sacramento does about climate change is vital to all area residents. This first draft CAAP provides an abundance of facts about the urgency of climate change and repeatedly outlines its concerns about environmental justice. While there are some CAAP goals and measures that are very exciting, the overall tenor of this document feels out of touch with the need for more rapid action.

I am struck, over and over, by the fact that the CAAP's goal year is primarily 2045, following the State's lead. A 2045 goal is way out of touch with the majority of the scientific community's consensus for more immediate action to deal with the more rapidly developing climate effects. A section in this CAAP even discusses inaction as too costly in the long run. The State of California is needing to amend their goal date. They are only now in the process of passing their own CED. This situation should not be an excuse for the City to slow down climate action. The current countrywide heat waves, the flooding in Missouri, the more recent massive storms and the wildfires are all blaring side effects of our earth heating up due to fossil fuel use. Declaring a climate emergency (yours in 2019) should be like a public health emergency and allow governments to take action more quickly due to the urgent need.

There are some positive actions or plans outlined in the CAAP. The City supports the new State mandated organic waste program and plans to explore the idea of long term organic processing facilities. The selection of 13 sites in Sacramento for participation in the Local Foods/Local Places (LFLP) Program is exciting. There is a call to increase the tree canopy to sequester carbon, save energy and protect residents.

I am glad the City is supportive of SMUD and the State around climate change action. What I do not see are measures the City can take that are more immediate and affordable.

As outlined in the Sacramento Climate Coalition's document "Climate Change Information, Input for the City and County of Sacramento" already sent to the City, there are many ways to immediately address resilience. In our main document and in prior emails sent by our organization, we suggested cool roofs and cool streets which can be accomplished with specialized paint. We suggested partnership with the County on a mobile software application that connects surplus food with food banks and businesses to distribute to insecure residents. I see that the CAAP includes a similar measure. The City's green waste and now organic waste collected needs to stay in the City and not be transported to locations outside our region. A local organic composting program can provide compost to the City, community gardens and to residents as an additional method of sequestration. The CAAP includes use of compost when planting trees. A composting program should be part of the organic waste program and a partnership with the County for equipment and manpower could lower costs and allow operation to begin in an earlier time frame. You can read about such a system in the City of Ann Arbor's CAP document. Also in the Ann Arbor document is a section on a plan to change to bi-weekly garbage pick up which can save money and lower GHG output. These projects are relatively straightforward and doable in the short term.

I cannot find any disaster planning in this draft. Perhaps it is the upcoming Adaptation portion. Resilience hubs, which contain food hubs, and a level of emergency and public health assistance, can also provide heat and cold respite for residents. As far as I can tell, there are only two City cooling centers. If City resilience hubs have solar power with backup

power supply, they can assist in being part of the local emergency system and take some weight off of first responders. Since the 13 LFLP programs are to be established, why not partner with the County and expand them to include these more comprehensive services. The hubs can provide education about food waste and composting (your CAAP includes this), provide tool lending and promote more local food via farmers markets at these locations. These proactive practices lower GHG and transportation costs, as well as eliminate packaging, all of which benefit the environment and our residents.

Another gap in this CAAP is no mention of the unhoused. Again, this may be covered in the Adaptation portion, but these are our most vulnerable to the effects of climate change. There is also no mention of the great need for affordable housing, which will help immensely with addressing the food scarcity problem.

I would also like to see the City promote the broad use of solar. I whole- heartedly support the City collaborating with SMUD on the proposed community solar and storage pilot program which could help out our lower income residents as well as the environment.

I believe the Office of Climate Action needs more staff for implementation and monitoring of the CAAP.

I realize this is the first draft of the City CAAP. There are volumes of information about the terrible effects of climate change in your CAAP, but the measures to address them are often caught up in feasibility studies and are written as "recommendations" (ie we will wait to see what new technology has developed rather than make plans now). Wait? This community needs proactive programs, not after the disaster clean up. The tools to get the ball rolling already exist with plenty of examples (Ann Arbor). There is a lack of a sense of urgency in this document. Agencies like SMUD and RT are critical specialized services, but the City relying on them to take action and kicking the can down the road on their action is saying we're concerned, but we'll put that off until later. It scares me that this appears to be where the City is, at this critical time. I am hoping the Adaptation portion provides some relief and that the second draft is more detailed with earlier timelines.

Thank you for your time and consideration. I am writing this for my children and grandchildren who will be left to deal with what we do or do not do.

Ann Amato  
Sacramento Climate Coalition  
Resident of Carmichael

<b>Full Name</b>	<b>First Name:</b> Dan <b>Last Name:</b> Meier
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>The Carbon Sequestration section of the City’s Preliminary Draft Climate Action and Adaptation Plan (Climate Action Plan) indicates that a key recommended action is to “Implement the Urban Forest Master Plan” (CS-1.1). It is important to provide information in the draft Climate Action Plan on the implementation and funding status of the Urban Forest Master Plan. While the City planned on releasing a final document in Summer 2019, this never happened, and currently there is no indication on the City’s website as to when a public review Urban Forest Master Plan will be released. A preliminary review draft should be released asap. It will be important for the City to focus on trees that are climate resilient, and that address carbon sequestration, minimize water use, and provide wildlife habitat benefits. To achieve these benefits, California native trees need to be a significant component of future trees to be planted. The Urban Forest Master Plan will need to collect and develop the scientific information to create a tree list to address climate resiliency and wildlife needs. This will require to City to look beyond the typical urban trees that are often planted throughout the United States and without regard to local conditions and climate resiliency. The draft Climate Action Plan should identify how utilizing compost and mulch around City-owned trees and within planters would increase carbon sequestration (CS-1.2). For measure CS-1.3, the educational materials about trees species should also address wildlife habitat benefits of using California native trees or closely related species. For measure CS-1.4, since the SMUD/Sacramento Tree Foundation tree program is a major source of trees for the Sacramento region it will be important that their tree list strongly consider the tree list developed for the Urban Forest Master Plan. Otherwise, the Urban Forest Master Plan will be ineffective at promoting climate resilient trees. There is no mention of the benefits of grasslands to promote carbon sequestration. A UC Davis study found that grasslands and rangelands are more resilient carbon sinks than forests. Grasslands store most of carbon underground in their root biomass. So when grasslands burn, unlike forests, the carbon tends to stay below ground, which is a benefit in the face of climate change. The City contains areas such as the Ninos Parkway and the American River Parkway which have significant acreage designated for native grasslands (See Ninos Parkway Master Plan and the Draft Lower American River Natural Resources Management Plan). The Climate Action Plan should promote native grassland restoration within the City to address carbon sequestration.</p>

<b>Full Name</b>	<b>First Name:</b> Daniel <b>Last Name:</b> Woo
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>Thank you and congratulations to the Sacramento Climate Action and Adaptation Planning team for the hard work in releasing this public draft CAAP! Overall, really appreciate the elevation of public health and equity considerations and strategies! In taking a quick scan, I saw that in the Introduction section discussing the Mayors' Commission and recommendations, the section for Community Health and Resiliency (CH&amp;R, pg. 5) appears to show inaccurate ones for the last two recommendations (the bullet for recommendation 2 Sustainable Food Systems shows a repeat of one of the bullets for Urban Greening and Forestry; and recommendation 3 is repeat of the Electrification of Existing Buildings under the Built Environment category). Can you make sure the final CAAP shows the correct recommendations for Community Health and Resilience? See the Mayors' Climate Commission report for reference: <a href="https://www.legacy.civicwell.org/wp-content/uploads/2020/06/Mayors-Commission-on-Climate-Change-Final-Report.pdf#page77">https://www.legacy.civicwell.org/wp-content/uploads/2020/06/Mayors-Commission-on-Climate-Change-Final-Report.pdf#page77</a></p> <p>The CH&amp;R recommendations 2 and 3 should be: RECOMMENDATION 2: SUSTAINABLE FOOD SYSTEMS Increase food security and access to healthy, affordable food for all communities, while supporting a regenerative food system by:</p> <ul style="list-style-type: none"><li>• Sourcing 25% of food locally within a 200-mile radius by 2030, and 40% by 2045.</li><li>• Reducing 50% of aggregate food waste by 2025, and 75% by 2030.</li></ul> <p>RECOMMENDATION 3: COMMUNITY CLIMATE RESILIENCE Identify climate vulnerabilities and adaptation strategies as part of the climate action plan or general plan updates by 2022. Develop and implement preparedness measures, with a priority focus initially on increasing the resilience of communities most vulnerable to climate-change impacts by investing in existing community assets and networks to increase community adaptive capacity. Thank you for your consideration! Dan Daniel Woo Co-Lead, Technical Advisory Committee Mayors' Climate Commission Community Health &amp; Resiliency</p>

## Helen Selph

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**From:** Jennifer [REDACTED]  
**Sent:** Tuesday, August 2, 2022 9:22 AM  
**To:** Jennifer Venema  
**Cc:** Laila Atalla; Matt Hertel; Laura Tuller; Climate Action Plan; Karina@karinatalamantes.org; Mayor Steinberg; Jeff S. Harris  
**Subject:** City of Sacramento Climate action - feedback

Thank you Jennifer, for review & consideration.

While I appreciate any efforts to phase out gas powered lawn devices in general, I do not think CO emissions should be ignored, compartmentalized, or separated outside of the CAP. Why?

While the most common GHG emission is carbon dioxide, there are others quite significant, including methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). Additionally, **Carbon monoxide (CO), is considered a potent indirect greenhouse gas.** It significantly contributes towards global warming in an indirect manner.

Please read on:

### **Air Pollution From Leaf Blowers**

The California Air Resources Board (ARB) says air pollution costs our state billions of dollars annually in health care and crop and building damage. It irritates eyes and throats, harms lungs, and causes cancer and premature death [\(1\)](#), including sudden death from heart attacks. Ozone\*, a gas, is Sacramento's worst air pollution problem [\(2\)](#), and we also have unhealthy levels of liquid and solid particulate matter (PM\*\*) [\(3\)](#). Blowers, especially gasoline-powered, contribute to both of these. Emissions from the two-stroke combustion engine include PM as well as gaseous carbon monoxide, nitrogen oxides, and hydrocarbons (CO, NO<sub>x</sub>, and HC). Leaf blowers also raise (entrain) dust from the ground. And evaporative emissions of fuel occur during the refueling process, which sometimes spills gas on the operators, and from the fuel tank. Comparisons that exclude some of these could understate the problem.

Fine PM<sub>2.5</sub> particles, which are man-made and do not occur in nature, evade the body's defense systems. According to the EPA and ARB they can increase the number and severity of asthma attacks, cause or aggravate bronchitis or other lung disease, and reduce our ability to fight infections [\(4\)](#).

Leaf blower motors are inordinately large emitters of CO, NO<sub>x</sub>, HC, and PM according to a study conducted for the ARB [\(5\)](#). Two-stroke engine fuel is a gasoline-oil mixture, thus especially toxic. Particles from combustion are virtually all smaller than PM<sub>2.5</sub>. According to the Lung Association, a leaf blower causes as much smog as 17 cars.

Street dust includes lead, organic carbon, and elemental carbon according to a study conducted for the ARB. The Lung Association states "the lead levels are of concern due to [their] great acute toxicity... Elemental carbon...usually contains several adsorbed carcinogens." Another study found arsenic, cadmium, chromium, nickel, and mercury in street dust as well [\(6\)](#). The ARB states that a leaf blower creates 2.6 pounds of PM<sub>10</sub> dust emissions per hour of use [\(7\)](#), and based on this a report from the Sacramento Metropolitan Air Quality Management District states that leaf blower dust is responsible for two percent of our PM [\(8\)](#). Blowers are widely used in residential areas where many people are exposed.

The EPA and ARB, in their brochure "Particulate Matter Air Pollution: A threat to our health" advise us, "Avoid using leaf blowers." The multi-agency Best Available Control Measure Working Group agrees.

In November 1997 the Los Angeles Times reported on studies by Kaiser and the California EPA showing a correlation between levels of air pollution and hospital admissions for cardiopulmonary problems (9). These reinforce conclusions reported in the August 1997 issue of Consumer Reports, which described the effect on preschool children as "especially startling." (10) Fifty thousand people in the city of Sacramento are particularly vulnerable to air pollution because of asthma or cardiopulmonary disease (11). Healthy adults and children who play or exercise vigorously are also at risk (1).

Sacramento must reduce its smog-forming emissions by 40 percent by the year 2005 in order to achieve healthier air (3), yet the Portable Power Equipment Manufacturers Association has asked its California members to lobby against stricter emission regulations developed by the ARB for 1999 (12).

- Ozone, three atoms of oxygen in one molecule, is formed by reaction of hydrocarbons (sometimes referred to as "volatile organic compounds," or VOCs) and NOx in sunlight. It is desirable in the upper atmosphere, but irritating to living tissue.
- \*PM air pollution consists of particles small enough to remain suspended in the air for a significant period of time (hours to days) unless washed out by rain or otherwise removed. PM is often described by its particle size as PM 10 or PM2.5, a number that refers to maximum diameter in microns. (Thus, PM2.5 is a subcategory of, and contained within, PM10.)

#### References:

1. "The California Air Resources Board", a brochure currently available at the ARB offices, 2020 L Street, Sacramento CA 95814.
2. "Spare The Air: Improving Air Quality In The Sacramento Region", published summer 1997 by the Sacramento Metropolitan Air Quality Management District, which says, "During the summer, we are among the worst areas in the nation for ozone air pollution" and advises us, "Don't use gasoline-powered lawn and utility equipment..."
3. California Air Resources Board: Status Report 1995-96.
4. "Particulate Matter Air Pollution: A threat to our health", Best Available Control Measure (BACM) Working Group, January 1997.
5. American Lung Association of Sacramento - Emigrant Trails, "Fact Sheet: Leaf Blower Air Pollution Impacts Study Results."
6. County of Fresno, Inter Office Memo, October 14, 1982.
7. July 9, 1991 letter from Terry McGuire, Chief, Technical Support Division, ARB, states, "We estimate that a single leaf blower reentrains about 5 pounds of particulate matter in an hour, about half of which is PM10."
8. Reported in the Sacramento Environmental Commission's "Leaf Blower Recommendations From the Subcommittee", October 27, 1997.
9. Los Angeles Times, November 21, 1997, "Alerts Urged at Lower Smog Levels".
10. Consumer Reports, August 1997, page 36, "Air Quality Special Report: Clearing the air". In this long, forcefully written, informative article, the magazine reports that, "Outdoor air--even air that meets present pollution standards--still can be hazardous to your health." The article explains that the scientific evidence is "remarkably consistent" and significant, in spite of assertions to the contrary by polluting industries. And it says that industry typically threatens ruinous cost increases if new regulations are imposed, "but when regulations have changed anyway, the predicted economic disasters haven't materialized."



11. Sacramento Bee, 1997 (exact date unknown), "Capital-area air labeled bad but legal". The article said 152,000 people in Sacramento County suffer from chronic obstructive lung disease, asthma, or ischemic heart disease. We assume the city's per capita rate matches the county's.
12. Sacramento Bee's California Life, January 17, 1998, "Garden equipment group steps on the gas".

On Aug 2, 2022, at 8:09 AM, Jennifer Venema <JVenema@cityofsacramento.org> wrote:

Good morning,

Thank you for your comments. We will review with the project team. The CAP is focused on GHG emissions, whereas small offroad engines like leaf blowers are major sources of smog-forming emissions. The state is also in the process of rolling out new regulations and incentives for small offroad equipment. However, we will review.

We will consider this feedback and follow up with any questions. Thank you for sharing the link to the additional resources as well.

Best regards,

Jennifer

Jennifer Venema

Climate Action Lead

Pronouns: She/Her ([Why do pronouns matter?](#))

City of Sacramento

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**From:** Jennifer [REDACTED]

**Sent:** Tuesday, August 2, 2022 7:13

**To:** [REDACTED]

[REDACTED]@cityofsacramento.org; Jeff

**Subject:** PS: City of Sacramento Climate Lunch & Learn

This is alarming information that should be a call to immediate action:

On Aug 2, 2022, at 7:10 AM, Jennifer <[doncald@hotmail.com](mailto:doncald@hotmail.com)> wrote:

I am sorry to have missed the lunch & learn, as previously shared:

I am curious to know why the CAP seems to have no mention of regulating or banning gas powered leaf blowing devices. Did I miss it? We really should ban these ASAP considering our own state Air Resources Board has documented that these devices are major GHG emissions in our environment.

Additionally, the weight of & particulate matter stirred up from each leaf blower is bad for the person handling them & anyone in their vicinity, over time. Ergonomics:

Edwhu|Orshudwhg edfnsdfn eaz huv z hLjk dwødw48 srxqgv/z kLh  
wkhlu jdvrdqhøsrz huhg frxqwhusduw z hLjk rq dyhudjh derxw43  
srxqgv p ruh @ 58 æv1

I would like to better understand the City's rationale on this issue. It seems very little progress has been made, yet many citizens have expressed concern over many years. Current issues posted at: <https://www.facebook.com/curbsacramento>

& the 1997 group's website: <https://www.nonoise.org/quietnet/cqs/clcapos.htm>



Thank you for registering for today's Climate Lunch and Learn.  
Great questions, and we appreciate your time and participation. For  
reference, you can find a PDF of today's slides attached.  
Please reach out with any additional questions.

Best regards,

Jennifer

Jennifer Venema  
Climate Action Lead

Pronouns: She/Her ([Why do pronouns matter?](#))

City of Sacramento

## Helen Selph

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**From:** Douglas MacPherson [REDACTED]  
**Sent:** Thursday, July 28, 2022 9:43 PM  
**To:** Climate Action Plan  
**Subject:** Action Required: Public input to Draft City of Sacramento Climate Action and Adaption Plan (CAP)

Dear City of Sacramento Staff and Elected Officials:

Thank-you for allowing the public to see and comment on the City's draft CAP.

I appreciate the effort the City is making in fighting Climate Change. Passing the Climate Emergency Declaration in 2019 was an important milestone.

There is much to commend in the CAP, but the failure to incorporate the Climate Emergency Declaration into the document and treat the Climate crisis as an Emergency I see as a major miss.

Specifically:

Page 1 paragraph three: "Sacramento's goal of achieving carbon neutrality by 2045".

This is in direct opposition to the city's Climate Emergency Declaration that stipulates a target of 2030 for Carbon neutrality. 2045 is too little too late and kicks the responsibility for taking action on to the next generation. Not acceptable. There must be accountability and responsibility for this generation...our generation.

Page 36 paragraph 2: "Sacramento's Climate Action Targets"

The listed targets may meet the CEQA for a "qualified" GHG reduction plan, but in no way match the level of change needed. This is an emergency! The City has officially declared the Climate an Emergency in 2019. Pages 10 through 22 in your own document accurately describe the cataclysmic effects Climate change will have on our city. 2045 is not enough. In no way does it treat this global threat to humanity in a way required in an emergency.

Thank-you again for your efforts and allowing input from the community.

--

**Doug MacPherson**  
[REDACTED]

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<b>Full Name</b>	<b>First Name:</b> Gabriel <b>Last Name:</b> Williams
<b>Email</b>	[REDACTED]
<b>Message</b>	Is this supposed to fool anyone? This is the wall Street plan to create energy monopolies. The state is on the brink of collapse, people can't afford food or transportation and this will turn over the remaining wealth to global corporations. You people will get what you deserve. Maybe not in this life. But rest assured it's coming.

## Helen Selph

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**From:** goli sahba [REDACTED]  
**Sent:** Friday, July 29, 2022 12:42 AM  
**To:** Climate Action Plan  
**Cc:** Chris Brown  
**Subject:** Comments on Proposed City of Sacramento CAP  
**Attachments:** Goli comments Sacramento Draft CAP.docx

Dear City of Sacramento Climate Action Plan team, and Ms Venema,

I thank you for the significant effort that has gone into this draft CAP! Many aspects of this including identifying the risks to our great City, and the Community Action plan.

My comments provide input for many areas including Funding Mechanisms, Carbon Sequestration, Transportation, as well as considering controlling plastic single use foodware and the banning of styrofoam.

Thank-you in advance for the hard work and extreme patience that will be required to read and hopefully incorporate the public's recommendations! As a Family Physician committed to public health issues, I feel no other topic deserves more of our energies than resolving the greatest threat to our Planetary health and survival -Climate Change.  
To your best health and happiness,

Glaiol Sahba MD

Sacramento Climate Coalition Steering Committee Member  
350 Sacramento Plastics Team Co-lead  
Member Physicians for Social Responsibility  
Third Act Sacramento

--

Goli Sahba M.D., IFMCP ( Institute for Functional Medicine Certified Physician), ABFM, Family Physician, ABIHM

Comments on the City of Sacramento Draft Climate Action Plan  
Date: 7-29-2022  
Glayol Sahba MD  
Sacramento Climate Coalition  
Steering Committee member

**Concern 1- 2045 is too late for Carbon Neutrality- the City's Dec. 10, 2019 Climate Emergency Resolution 2019-0465 commits the City to be carbon neutral by 2030** and states:

1. "Human activities have warmed the Earth to a point that threatens climate stability, and climate change has already set in motion catastrophic changes to the Earth's systems, including fresh water scarcity and droughts, floods, extreme weather events and increased heat, wildfires, accelerated ice mass loss that will result in sea-level rise, and species extinction.
2. With current greenhouse gas (GHG) emissions levels, nine tipping points have been identified as already active in 2019 and it is unknown how soon their thresholds may be exceeded."
3. A letter signed by over 11 thousand scientists in the January 2020 (Vol. 70, No. 1) issue of Bioscience states: "Especially worrisome are potential irreversible climate tipping points and nature's reinforcing feedbacks (atmospheric, marine, and terrestrial) that could lead to a catastrophic "hothouse Earth," well beyond the control of humans." It urges against business-as-usual actions.

***Slow action is equivalent to inaction if we fail to act quickly to prevent irreversible tipping points!***

Draft CAP:

1.Introduction Page 1 Paragraph 2: "In order to avoid the most destructive and costly impacts of climate change, **the world** must achieve carbon neutrality by the middle of this century."

- A. The fact that this statement, especially the use of the word "world", is not understood in the IPCC report context that developed nations must reduce their emissions much faster to allow developing countries to evolve their industries and standard of living is highly problematic! Missing this most important basic point has led the City to propose a Climate action plan that reduces too little emissions and too late to prevent irreversible climate instability. **The potential costs of inaction or slow action include 100's of billions of lost dollars, the extinction of over one-million plants and animals and thousands of premature deaths, loss of livelihoods such as farming in California and the disruption of the communities of many people.**

**B.** Additionally, as a member of the Mayors' Climate Commission TAC on resilience, this writer and others questioned the nonaggressive 2045 goal for carbon zero to which the facilitator just responded to the effect that this was the date that was imposed by the framers of the commission and was unchangeable by definition!!! Since then, the city cites the Mayors' Climate Commission as having determined this date, where in fact, **2045 was dictated to the commission prior to the start of the Commission's work!**

C. This statement's reference hyperlink sends one to a dead-end site and not to any IPCC report.

## **Concern 2: Need for Robust short, medium and long-term Climate Action Funding Plan**

Funding Mechanisms: Appendix D

Additional/New funding mechanism recommendations:

1. Recommendations: **County, City and SMUD to collaborate with a Committee on Climate Emergency Program Funding Mechanisms** to accelerate the implementation of climate mitigation and adaptation programs. City must set aside funds to hire staff in above collaboration as well as researching funding mechanisms by other cities and countries which have robust climate infrastructure funding and to complete Federal and State Grant applications. (Could begin within a few weeks)
2. **Consider Implementing a Business License Surcharge Tax:** This could be modeled after the existing and successful Clean Energy Fund in Portland which generates between 40-70 million dollars per year from placing a surcharge on larger businesses operating in that City and even higher rates for businesses with incomes greater than \$1billion dollars such as Amazon, etc. Though it would require ballot measure, since it only taxes larger and out of state businesses it has a higher likelihood to pass than a measure that taxes most Sacramentans. (short term 1 year)
3. **Initiate a committee to research and consider forming a Public Bank of Sacramento** as has been done by 25 other states and 18 California municipalities including San Francisco, East Bay and Los Angeles. This could safely generate funds to defray many of the costs associated with building the green infrastructure, generating the sustainable jobs, and assisting with housing

the unhoused- all of which are necessary to achieve carbon neutrality and community resiliency. In doing so, Sacramento funds would be divested from Wall Street banks with insecure schemes and the underwriting of future fossil fuel projects. Huge potential for annual savings on interest payments on City's long term debt could be achieved:

**For example, In 2020 Oakland paid \$63 Million in interest on its long-term debt = 6% of its annual budget. A Sacramento Public Bank could refinance City's loan resulting in significant lower interest payments by the City.**  
(Medium range 2-3years to set up but potential to be a lasting institution like the Bank of North Dakota-100+ years)

3.5 Summary: Agree with tax measure similar to The City of Austin's Project Connect Measure A as well as the Motor vehicle registration surcharge, though would charge a much lower amount for EVs to encourage adaptation of this clean energy technology! Leverage the funds from the tax measure to obtain federal grants that need matching funds.

4.6- Development impact fees- VMT mitigation bank- "Currently, regional support for a VMT mitigation bank does not exist. "Unfortunately, these moneys would be generated by programs that allow GHG release and then would have to be used by the City to initiate programs to clean the GHG's.

4.7: "Another example of a potential local funding measure that would require state authorization is taxes on TNC users. In 2018, California Assembly Bill 1184 confirmed that the City of San Francisco (only) had authority to place Measure D on its November 2019 ballot, and it was subsequently narrowly approved by the voters. This measure assesses a tax on ride share companies (car, bike, scooter, etc.) to raise funds for transit, pedestrian, and bicycle services. The rate is 1.5 percent for rides in zero emission vehicles and 3.25 percent on private rides, such as Uber and Lyft. The City of San Francisco expects to generate from \$30 million to \$35 million per year from this program. Along these lines, Measure TR-2-13 calls for the City to investigate and lobby for the development of a TNC user tax. "

This would represent a useful steady source of income generated more so by City visitors than locals. The annual adjusted amount for Sacramento's lower population would be about \$6 million.

**Concern 3: Need for Public Education and Inspiration Campaign: Community Action Guide P. 147: this is really well done and I truly appreciate all of the links to resources and forms and information!**

My main recommendation in this section is to also quickly begin a programmed public ad campaign such as on buses, bus stops, City's website, which rotates through all of the actions that need to be done and refers them to this Action Guide webpage so that



they can follow the links. Additionally, we suggest a formal public service education bus/radio/media ad program to ensure success in reaching the City's Climate Emergency Declaration's 2030 as many folks are unaware of the steps they can take to help in preventing the worst effects with such ideas as:

1. SMUD's forward thinking campaign: "Clean Power City by 2030"
2. "Drive Less Sacramento"- walk, bike or ride more
3. Make public transportation irresistible: "Why Drive?" Further incentivize City, State and County workers to "park and ride" by adequately funding more rapid and efficient public transportation. Change the current 75% subsidy for city and state employees to FREE to really see increased ridership!
4. "Make your next car an EV" and to borrow from the Sonoma collaborative, "EV access for All": Collaborate with SMUD and the County to install EV chargers and with GIG car companies.
5. "Electrify for your Health"- Gas appliances increase the risk of asthma in Kids by 40%!
6. "Kick the Single use Habit-" Plastic is Choking our Planet." City/County ordinances to ban Styrofoam and encourage reusable takeout ware by customers and entrepreneurial companies.
7. Family Actions to prepare for community's Carbon Zero by 2030 Goal:
  1. Conserve electricity and water-weatherize home (provide incentives to do this)
  2. Electrify your home as appliances breakdown starting with
  3. Electric heat pump
  4. electric water heaters
  5. commute to work by Telecommuting/RT/Bike/Carpool
  6. teach making and showcase low-cost solar-cookers, etc.

#### **4. Concern: Transportation-We must envision what we want in order to achieve it!**

P.4. "Expand and Improve transit and shared mobility services to be more accessible, affordable and timely and attractive than single occupancy vehicle use so that . . . 50% by transit and pooled shared mobility by 2045."

This was the vision of the Mayors' Climate commission but sadly, the CAP is only proposing to reach for a fraction of that: 11% by 2045!!! ( see TR -2 below)

P. 101: "MEASURE TR-2: Support Public Transit Improvements to Achieve 11% Public Transit Mode Share by 2030 and Maintain Through 2045"

**Recommendation: Imagine taking the current 8.5 billion bond measure, the so called "Citizen's Transportation measure "which initiates a ½ cent sales tax to add GHG polluting South east connector highway and instead, using it to fully fund RT with 21<sup>st</sup> Century Rapid transit system. This would amazingly increase ridership way more than your suggested 11% 2030 goal! Again, you did not take the Climate Commission's recommendation of at least 30% of all trips be by public transportation. And again, we are in a climate emergency, so please act as if your children's future depends on this, because it truly does!!!!**

Page 147 Paragraph 4: "Cost: Low to none. Walking, Biking, skateboarding and scootering are great low and no cost alternatives to driving and can improve resident's health and wellness."

This demonstrates that the City does not intend to spend significant amount of funds to improve active mobility infrastructure that is needed to make many Sacramentans feel safe for bicycling on the streets especially with their children.

We applaud the Students Ride Free program and urge its continuation!

Page 148 "Buy Lease or Borrow an EV when it's Time for a new Car". This page also needs to start with a slogan to inspire folks to drive less as has instituted Sonoma called Drive Less! Sonoma!

P 149. "Compost Your Yard and Food Waste": this is a great program that has been started. I would recommend that the composting be done locally in Sacramento to avoid the carbon footprint of driving organic waste far away out of the County using fossil fuel powered trucks.

P 100: "Achieve 6% active transportation mode share by 2030 and 12% by 2045 "

**Proposed change: accept the Mayors' Climate Commission recommendations of 30% active mobility by 2030**

Why if your Commission recommended 30 percent of trips to be by active transportation did you switch to 6%? It is a Climate Emergency and these commissioners, experts in their fields, spent 2 years reaching consensus to bring you their recommendations. It is unacceptable that the CAP does not take the aggressive approach needed to prevent catastrophic Climate change!

P. 101 TR-1.3 "Conduct a study to identify the physical barriers to active transportation by 2025 and remove them by 2030 to support local partners and community groups."

Does it take three years to do a survey? Besides, local bicycle advocates have already done surveys which show that most folks do not bike because they find the roads/ infrastructure not safe! **The survey should be done in 3-6 months and then implementation of removing the barriers should be done by 2025 not 2030 so that we can decrease VMT's ASAP.**

P. 106 TR 2.13 “Investigate and lobby for the development of a TNC user tax which would put a small fee on the use of Uber, Lyft, and others and generate funds to pay for transit and transportation infrastructure and related programs.”

**Recommendations:** Agree with this measure and would go much further in controlling rideshare and other car fleets:

**1. Initiate a City ordinance for 10% Fleet electrification per year to have all privately held car fleets- rentals/rideshares/cabs invest in our City for the privilege of using our costly infrastructure by paying for the electrification of their car fleets 10% each year until reach 100% by 2033. (Shenzen, China, a city of 12 million achieved an all-electric taxi fleet by 2020.)**

**2. Begin electrification of all City Fleets of cars, trucks, buses, and garbage equipment, etc. with similar timeline. Apply to federal and state Climate Change grants for funding.**

**3. As part of the Climate Emergency Powers derived from the City’s Climate Emergency Declaration urge State Employers with Sacramento employees to also incentivize workers with loans/grants to electrify their vehicles at the same rate in order to clean up our congested and toxic air.**

## **5. Carbon Sequestration- no mention of other modalities than planting trees:**

P 124: “CS 1.1-1.4”

These only mention tree planting and not the care and watering services needed to keep these alive. It is my understanding that outside of the more established Sacramento Grid there is not much tree irrigation / maintenance in the areas that have the lower levels of canopy already. If this is the case, recommendations for applying for state and federal climate change grants to improve tree canopy and reduce heat island effect as part of correcting health and wellness disparities.

### **Recommendations:**

1. Apply City generated compost from new composting program to increase carbon sequestration in all city parks, city medians and planting strips next to the roads that are owned by the city, not just to the trees and containers.
2. Offer compost at low or no cost to City residents to improve privately held land carbon sequestration.
3. Initiate Climate Emergency Ordinance to have all undeveloped, unpaved community properties and city properties to be covered by City provided Compost annually- owners to spread the compost or pay for city to do so.

4. Initiate Climate Emergency Ordinance to use of at least 50% of new parking lot trees to be large canopied Native trees that will particularly withstand prolonged drought and flooding such as Valley Oaks which will also minimize Native species' loss.
5. Initiate Climate Emergency Tree ordinance to replace dead parking lot trees by large canopied Native trees that will particularly withstand prolonged drought and flooding such as Valley Oaks which will also minimize Native species' loss
6. Provide community resilience and food sovereignty by incorporating a list of drought tolerant fruit trees(such as Pomegranate, Persian fruiting Mulberry, persimmons and others(<https://balconygardenweb.com/best-drought-tolerant-fruit-trees-low-maintenance-fruits/> ) that can be planted along with shade trees especially in communities with need of trees to mitigate food deserts and reduce dependence on expensive and imported fruits.

**6. Concern: Single use plastics:** P:112 The CAP's Waste section only addresses organic materials, yet daily thousands of pounds of plastics are added to our landfills with huge amounts of fossil fuels used to transport them away from consumers where they will off gas Methane and other toxic chemicals for unknown lifetimes to come! Single Use plastics contribute significantly to Climate change as well as contribute to chronic disease due to carcinogenic and endocrine disrupting chemicals which emanate into the foods they contain in both hot and cold foods! The costs to our society and the burden of death, infertility and other morbidity is huge.

**Recommendations: 1. Adopt an Ordinance modeled after those from Cities such as Berkeley which have regulated use of single use food ware and charge for even compostable beverage cups to inspire Bring your own containers (BYOC culture):**

<https://berkeleyca.gov/doing-business/operating-berkeley/food-service/single-use-foodware-rules>

2. **Include in above Ordinance a on Ban Styrofoam food ware** use as Berkeley has done in 1988! due to its highly potent GHG production (HFC's which are thousands of times more potent than CO<sub>2</sub>); impacts on Marine wildlife; toxic chemicals that affect Styrofoam factory workers; and the toxic effects( styrene and benzene from which Styrofoam is produced are known to cause cancer/DNA damage and Leukemia respectively) on the users especially in hot foods such as from coffee cup lids and food clamshells! <https://epe.global/2019/10/18/measuring-pollution-from-the-eps-manufacturing-process/>

Plastic facts from the Univ of Colorado Bolder Environmental Center Website:

<https://www.colorado.edu/ecenter/2021/02/25/climate-impact-single-use-plastics>

## **“How is Single-Use Plastic Production Contributing to Climate Change?**

- Because single-use plastic is produced from fossil fuels, the process of extracting and creating these plastics emits huge amounts of greenhouse gases.
- It is estimated that just the extraction of these fossil fuels and their transportation to plastic factories emits 12.5 to 1.5 million metric tons of greenhouse gases.
- The removal of forested land for oil extraction and pipeline construction has also resulted in over 1.6 billion metric tons of carbon dioxide being released into the atmosphere. This land clearing also limits the amount of carbon dioxide removed from the atmosphere.
- The refinement of plastics emits an additional 184 to 213 million metric tons of greenhouse gases each year.
- Landfills, where thrown out single-use plastics are sent, account for over 15% of methane emissions. The disposal of more plastics to landfills leads to increases in landfill size and these emissions.”

<b>Full Name</b>	<b>First Name:</b> Jennifer <b>Last Name:</b> Caldwell
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>In the CAP I see no mention of restrictions on gas powered lawn equipment, such as leaf blowers, mowers, etc. These devices emit mass quantities of GHG emissions as they burn fossil fuels. Additionally, they blow particulate matter into our air with no consideration for their surroundings. Often the operators are oblivious to people &amp; autos passing by... this leads to a lot of debris being deposited on our autos, property and in our lungs. Why is this not an obvious topic being addressed in the CAP? Many state &amp; national studies have demonstrated the danger to our health and to climate change. Come on Sacramento, we can do far better!! Many local governments nationwide have incorporated bans to leaf blowing devices. These devices are heavy so the user is ergonomically damaging their bodies. BRING BACK THE RAKE, please. Let's restore sanity to landscape care.</p>

## Helen Selph

---

**From:** Kim Alexander [REDACTED]  
**Sent:** Wednesday, July 20, 2022 2:09 PM  
**To:** Climate Action Plan  
**Subject:** Public Comment on Preliminary Public Review Draft CAP

Hello Friends,

Thank you for the opportunity to comment on the [draft CAP plan](#).

I noticed there are no provisions in it to address the **harms caused by the use of gas-powered lawn equipment**. Please consider adding some provisions. Here are my suggestions below:

- 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.

Sincerely,

Kim Alexander

Sacramento Resident and Mow Better co-convener (a group of Sacramento-based community leaders and stakeholders working to phase out the use of gas-powered lawn equipment in our region).

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Marion <b>Last Name:</b> Randall
<b>Email</b>	██
<b>Message</b>	Attached are my comments/suggestion related to Sac City CAAP.
<b>Upload File(s)</b>	Sac CAAP Report Observations and Feedback.docx



## Sac CAAP Report Observations and Feedback

### General

- Sacramento City should set bolder goals than the state by moving up the target dates. In the Sacramento Bee, July 26<sup>th</sup> there was an article in which Governor Newsome was critical of the Air Resources Board target dates for air quality improvements of 2045. He, like so many of us know that this target is too far out.

### Chapter 6

#### Waste

- With food deserts existing in under served areas and increased food insecurity all around, the goal of 20% edible food recovery by 2025 in the Farm to Fork Capital seems weak. We should aim to do better than the 20%.

#### Carbon Sequestration

- The current tree canopy is 19% and the goal is to increase it to 25% by 2030. 10% of trees are in public parks and along streets. The other 90% is on private property. The report notes that with regard to the 90%, barriers such as cost of maintenance, drought etc are potential issues for increasing the tree canopy on these private lands. While this may be true, the report does not specifically address the Cities commitment to increasing the tree canopy for the 10% within their control. These two items should be addressed separately. There should be stand-alone goals and performance indicators for each item. As relates to the 10% the city has responsibility for, there should be a clear goal established to increasing the tree canopy specifically in the “heat island” areas of the city with a corresponding aggressive timeline and allocated resources. Trees are a long term investment and they need time to grow..

## Helen Selph

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**From:** Nora Juhasz [REDACTED]  
**Sent:** Saturday, July 30, 2022 10:55 PM  
**To:** Climate Action Plan; Climate  
**Subject:** Comments for the preliminary Climate Action Plan

Dear Planning Staff and City Council members,

Thank you for the opportunity to provide comments regarding the City Climate Action and Adaptation Plan.

The plan needs to have a GHG measure and action regarding the elimination of fossil-fuel powered landscaping equipment.

Brief background:

The California Air Resources Board (CARB) reports that the small off-road engines used mainly for landscaping work now produce more smog-forming emissions than those from all the cars (approximately 30 million vehicles) operating in California. The most egregious polluter in this category is the gasoline-powered leaf blower. Using a gas leaf-blower for one hour produces the same amount of emissions as driving a typical passenger car 1100 miles. These powerful machines typically produce air-speeds of over 200 miles per hour and increase airborne particulates including pollen, mold, asbestos, animal feces, herbicides and pesticides. They also cause significant noise pollution, which can cause hearing loss, increased blood pressure, and heart disease.

The environmental justice aspect of this measure is significant, as the majority of gardening and landscaping employees are from EJ disadvantaged communities. Their work requires them to carry a 30 pound gas engine on their back, which exposes them to high levels of emissions, including particulates, carbon monoxide, benzene, and other VOC's. They are also exposed to harmful levels of noise from the engines, which often exceed 85 dB, which according to NIOSH, can cause permanent hearing loss from 8 hrs of exposure, and also harmful cardiovascular effects.

CARB recently banned the sale of new gas-powered leaf blowers in the State of California starting in 2024, and will phase out the sale of all other gas powered landscaping equipment by 2028. Over 25 California cities have already completely banned the use of gas-powered leaf blowers, including Oakland, Santa Monica, South Pasadena, Claremont, Sonoma, Berkeley and Hermosa Beach.

A measure is needed to "eliminate fossil-fuel powered landscaping equipment". This measure has significant air quality and health co-benefits, including Public Health (reduced harmful emissions and noise), Community Cost-savings (no need to buy expensive gasoline and oil), Job Creation (production and sales of electric equipment) and Environmental Quality (reducing air and noise pollution)

Actions should include:

1. Develop and adopt an ordinance to eliminate gas-powered leaf blower use by 2025, with funding to assist low income gardeners to trade-in old equipment and purchase zero-emission leaf blowers and mowers.
2. The City of Sacramento will 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.
3. The City of Sacramento will 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 will 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 will devote more resources to publicizing this program.

Thank you,

Nora Juhasz

## Helen Selph

---

**From:** Guy Hall [REDACTED]  
**Sent:** Wednesday, July 6, 2022 4:33 PM  
**To:** Helen Selph  
**Subject:** Fwd: CAAP Clarification

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Helen,

can you help us with this?

Guy Hall

----- Forwarded message -----

**From:** Guy Hall <[Guy.Hall@sacev.org](mailto:Guy.Hall@sacev.org)>  
**Date:** Wed, Jul 6, 2022 at 3:20 PM  
**Subject:** CAAP Clarification  
**To:** Jennifer Venema <[ivenema@cityofsacramento.org](mailto:ivenema@cityofsacramento.org)>  
**Cc:** SacEV Board of Directors <[board@sacev.org](mailto:board@sacev.org)>, Cynthia Shallit <[cynthiashallit@gmail.com](mailto:cynthiashallit@gmail.com)>

Jennifer,

Can you clarify this mention in the CAAP?  
"28 percent ZEV registration by 2030"

Is that all EV registrations on the road or new EV registrations in 2030? (i.e. % of auto sales in 2030)

Thanks in advance,

### Guy Hall

916 717-9158  
Chief Strategy Officer, Sacramento Electric Vehicle Association,  
President Emeritus, Sacramento Electric Vehicle Association,  
Board Director For Legislative Affairs, Electric Auto Association,  
Director Sacramento Clean Cities Board

Follow me for regional EV News @Guy\_Hall

**Web:** [www.SacEV.org](http://www.SacEV.org) [www.ElectricAuto.org](http://www.ElectricAuto.org) [Facebook](#) [LinkedIn](#)

<b>Full Name</b>	<b>First Name:</b> soulher <b>Last Name:</b> poword
<b>Email</b>	[REDACTED]
<b>Message</b>	Solar power can be be implemented quickly by creating higher paying jobs. If Wall Street was worthy so is this planet and all of its inhabitants. 2030 will be too late.

<b>Full Name</b>	<b>First Name:</b> Susan <b>Last Name:</b> Rainier
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>What a beautiful report, addresses key issues of great importance, yet misses the one most glaring issue - dysfunctional freeways on the Sacred River! In fact, all the photos in the report show a beautiful city on the river yet artfully avoided ANY photos of the freeways. This is the elephant in the room. These dysfunctional freeways actually CAUSE gridlock which in turn creates MUCH MORE GHG! (vehicles going slow, especially trucks). Pollution is dumped into the downtown area! How can this be ignored? OK federal highways need federal help - Build Back Better, Please! The last photo in the report makes the biggest impact to me: How can the Capital of the State of California be stuck without a beautiful public passage along the river with beautiful trees and places to be? No, there is a bizarre array of curving unsafe highways going everywhere - making the primo area of the riverfront a creepy dark area under freeways - no photos were shown of this fact. These freeways are old, not designed correctly for the city or the population. I-5 needs to go straight, outside the city with loops in (It makes a 90 degree turn in Woodland to come down to the river because Macy's wanted it back with the mall went in!) I-80 is a one-lane exit off of I-80 in West Sacramento! Both of these are traffic pinch points and CAUSE GRIDLOCK. The gridlock will be there even if all vehicles are electric. The time has come to make a correction and make Sacramento the World Class City it deserves to be - but cannot be due to these freeways being on prime riverfront land. The Capital park, the big trees by the Crocker Art Museum - the plans to put a major hospital on rail yard....by a freeway? Not healthy on any level, nor beautiful. Sacramento is known for road rage nationally - not in report. Sacramento has many accidents on these highways due to the criss-crossing entrance/exits design that is so horrible and the almost daily gridlock, not in report. Free the River in Downtown Area! Fix the freeways for the population growth, resilience for evacuation purposes, for better flow to not focus pollution into downtown. The State of California Capital needs to be a beautiful place that has the greatness of other global cities: Respect and Beauty along the River - a place to walk and be with the family - do I need to name the cities that have recognized this and done it? Why not Sacramento? It needs Political Will. Finally, a suggestion would be to give all developers a copy of the Living Community Challenge as the "guiding principles". This will help develop the right mindset for development. ( note: no more sprawl, no building on prime farmland etc.) Other than this, it is a wonderful report and the photos were great - just misleading....yet did show the potential and benefits as if the freeways were not there!</p>

<b>Full Name</b>	<b>First Name:</b> Suzan <b>Last Name:</b> Tobin
<b>Email</b>	[REDACTED]
<b>Message</b>	<p>Thank you for the opportunity to comment on this important document in its preliminary stage. I have a few comments/suggestions that are related to active transportation and transit. In this preliminary document, there is mention of City DPW collaborating with RT to achieve 11% of trips by 2030. As is stated in the document, this is far lower than the recommendation of the Mayor's Commission on Climate Change. I understand the need for realistic goals, but I wonder how this aligns with the ghg reductions required to avoid the worst scenarios of a heating planet. Perhaps subsequent studies will come up with new actions to increase transit ridership. Perhaps there could be heavily promoted "leave your car at home" days with incentives for households that pledge to participate. I know that Sacramento Regional Transit is a separate organization. Yet, this document would be more effective and comprehensive if it included information about RT's own planned actions for improving service and increasing ridership as well as information about electrifying their fleet and how these actions would be measured to meet ghg reduction goals. As temperatures rise, bikeways and transit stops are going to need more shade. In this preliminary document, "more trees for shade" was the third highest request in figure 4-5. Youth Feedback on Active Transportation and Transit. Also in this document, there is discussion of tree planting in the carbon sequestration section. Is it possible to include a paragraph about targeting some tree planting in a way that it will benefit active transportation and transit? Also, where it's safe, shifting bike lanes from the left side of the parking lane to the right side next to the curb will allow cyclists to benefit from shade of trees that are planted in the planter areas. In addition to tree planting, I wish the city would look into solar panel roofing over some bikeways along sunny levee tops and on pedestrian overcrossings that are often long and hot. Perhaps lack of shade will be included in a subsequent study of barriers to active transportation and corrected as part of action TR-2.10. Although I understand the challenges, I'm dismayed that all discussion of carbon neutrality refers to 2045 rather than 2030. I worry about what living in Sacramento will be like in 2030, much more in 2045. Again, thank you for this opportunity.</p>

## Helen Selph

---

**From:**

[REDACTED] 4:00 PM

**To:**

ClimateActionPlan@saccounty.net

**Cc:**

Greg Sandlund; Jennifer Venema; Laila Atalla; Climate Action Plan; publiccomment@cityofsacramento.org; Mayor Steinberg; Angelique Ashby; Sean Loloee; Jeff S. Harris; Katie Valenzuela (City); Jay Schenirer; Eric Guerra; Rick Jennings; District8; Mary Lynne Vellinga; Karina Talamantes; Veronica Smith; David Gonsalves; Michelle Pariset; D4 Constituent Services; Allison Joe; KaSandra Soto; Dennis M. Rogers; Ryan K. Brown; Jaime R. Cervantes

**Subject:**

Climate Action Plan Comments

Dear All,

Please take this golden opportunity to end all gas-fired leaf blower use in the City of Sacramento. The price we pay for the convenience is egregious compared to the claimed benefits of these devices. They are harmful in every manner of their operation: their physical assault on our senses; the fine,  $\leq 2\mu$  particulate matter that settles in our lungs and on our homes; vehicles; trees and shrubbery; and their greenhouse gas emissions. Professional landscapers would not become unemployed if leaf blowers disappeared. Leaf blowers benefit the few, but every resident old and young pays for their convenience with the quality of their lives and health.

Thank you, for make this a part of our City's Climate Action Plan.

Sincerely,

*Tom*

Tom Biglione

[REDACTED]

[REDACTED]

*"The health of our waters is the principal measure of how we live on the land."*  
~ Luna Leopold



<b>Full Name</b>	<b>First Name:</b> Tony <b>Last Name:</b> Wright
<b>Email</b>	[REDACTED]
<b>Message</b>	The community is trying to reduce greenhouse gases and yet they restrict solar projects to a very limited criteria. We proposed a project to develop a 1.6 megawatt solar project within the city limits and we were turned down because it was too small. It seems that if we are willing to do all the work and sell the power to SMUD at a reasonable price they would be receptive to the project. Are there plans to reduce the restrictions in the future to allow smaller solar projects to contribute the reduction in greenhouse gases?

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> muriel <b>Last Name:</b> strand
<b>Email</b>	██████████
<b>Message</b>	please see uploaded document "sac city CAAP comments mstrand"
<b>Upload File(s)</b>	sac city CAAP comments mstrand.pdf

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](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-WyhTNI8WXoHaFQ6.pdf>

[https://ww2.arb.ca.gov/applications/public-comments?](https://ww2.arb.ca.gov/applications/public-comments?p=comm&s=bccommlog&l=22spcarbonneutrality)

[p=comm&s=bccommlog&l=22spcarbonneutrality](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-VCcAZQRqV3QFaIQ6.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 fuels are so cheap. 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/>

## Helen Selph

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**From:** Paul Philley [REDACTED]  
**Sent:** Saturday, July 30, 2022 12:51 PM  
**To:** Greg Sandlund; Climate Action Plan  
**Cc:** Molly Wright; Karen Huss; Shelley Jiang  
**Subject:** Sac Metro Air District Comments on July 1, 2022 Draft CAAP  
**Attachments:** SMAQMD\_comment-SacCity\_CAAP.pdf

Dear Mr. Sandlund,  
Our comments on the City of Sacramento's Draft Climate Action and Adaptation Plan are attached.

Sincerely,

**Paul Philley, AICP**

Program Supervisor  
CEQA and Land Use  
[REDACTED]

[www.AirQuality.org](http://www.AirQuality.org)



SACRAMENTO METROPOLITAN





July 30, 2022

Greg Sandlund, Planning Director  
City of Sacramento – Community Development Department  
300 Richards Boulevard, 3<sup>rd</sup> Floor  
Sacramento, CA 95811

**Re: City of Sacramento Preliminary Climate Action and Adaptation Plan**

Mr. Greg Sandlund,

The City of Sacramento released its Preliminary Climate Action and Adaptation Plan (CAAP) for public review on July 1, 2022. We commend the City of Sacramento for its development of a plan that details its commitment to reduce greenhouse gas (GHG) emissions to 3.63 metric tons (MT) of carbon-dioxide equivalent (CO<sub>2</sub>e) per capita, or 63 percent below 1990 levels, by 2030. We also commend the City of Sacramento in planning for its ambitious net-zero per capita target by 2045 in conjunction with its 2040 General Plan. The preliminary CAAP focuses on reducing GHG emissions from communitywide activities and government operations through a suite of policies, programs and aspirations; we look forward to reviewing the full CAAP when it is released later in 2022.

We make the following comments in the spirit of encouragement to help the City improve and strengthen its CAAP, both for the ease and success of implementation, but also for the protection of the health and safety of City of Sacramento residents.

**Overarching Comments**

We recommend greater thought and specificity toward developing each of the CAAP strategies and actions. We appreciate that the City of Sacramento has connected each CAAP measure with the Mayors' Commission on Climate Change recommendations. We would like to see greater level of detail in outlining each of the measures and supporting actions, if available.

- With over 187,000 occupied housing units, the City of Sacramento has a large inventory of existing homes, more than half of which were built before 1980, prior to more stringent energy efficiency requirements. The City should consider additional measures to increase building energy efficiency and high-albedo surfaces to reduce energy use. While it may be difficult to quantify energy saved through building efficiency improvements as a result of the rebound effect, these measures can improve resident comfort, provide energy and financial savings, and reduce peak demand – significant for not only grid stability but also to greenhouse gas reductions, as the carbon intensity of marginal electricity use during peak hours is likely to greatly exceed the average carbon intensity of electricity. To that end, the City should require cool roofs for renovations and additions to existing structures, and encourage cool walls, especially on older, pre-1980

buildings. Cool walls are a simple and cost-effective measure to reduce heat gain in pre-1980 buildings with limited wall insulation, and can be simple as applying a new coat of paint to exterior walls. While the most effective paint colors are white or light in shade, cool paints in darker shades with greater albedo properties also exist<sup>1</sup>. Moreover, cool walls are complementary to cool roofs, as they provide cooling during mornings and late afternoons/early evenings when the sun is a lower angle.

- We applaud the City's commitment to all-electric new construction, which is consistent with the Air Resource Board's 2022 Draft Scoping Plan and leverages SMUD's 2030 zero carbon electricity target. Every step the City takes to shift energy use from combustion to electricity will benefit both climate and health. As SMUD's actions and 2030 plan generate the majority of reductions in the CAAP, we urge the City to identify additional measures to accelerate the all-electric conversion of entire existing buildings (not just individual appliances) and build healthful, sustainable communities. To that end, we have offered additional recommendations in our comments on Chapter 6.
- Beyond buildings, transportation is the largest source of greenhouse gas emissions in the City. While the Air District and region have invested heavily in zero-emission transportation technology and infrastructure, shifting travel behavior to active and shared modes is especially impactful from a public health and climate standpoint. We look forward to the City building on the success of its recent TIRCP award and continue to rethink the relationship between the public right-of-way, vehicle electrification, and safety of active modes. Mobility hubs, protection for vulnerable road users, and other infrastructure investments to support active transportation networks can yield critical health benefits – and activate the streetscape – beyond emission reductions.
- Thoughtful land use planning is critical to building low-emission communities, both through energy use and reduced vehicle miles traveled. We applaud the City's focus on locationally-efficient development and look forward to seeing more walkable, mixed-use neighborhoods develop and flourish.
- Finally, climate action and adaptation plan project review checklists are critical to successful CAAP implementation because it is impractical to evaluate every development project against every policy in a CAAP. Sac Metro Air District respectfully requests that subsequent CAAP drafts include a checklist for reviewers to assess in terms of how effectively it facilitates measure implementation at the project and permit level.

### **Chapter 1 – Introduction**

- **The Science of Climate Change, p.8:** In the discussion of the main sources of GHG emissions in cities, it would be helpful to note that transportation is the largest source of GHG emissions both for California and for the City of Sacramento.
- **Temperature Increase, p.10:** The impacts and consequences resulting from increases in *annual average temperature* should be differentiated from the increase in extreme heat days and heat waves. Currently, the discussion of the increase in annual *average* temperatures focus on health impacts that are more likely to result from increases in extreme heat days and extended heat waves, rather than the long-term, average temperature. Impacts of increases in annual average temperature include warmer winters and springs, which can result in reduced snowpack, decreases in availability of hydroelectricity generation, water shortages, and increased likelihood of rain-on-snow flooding, such as that which recently affected Yellowstone National Park. It will also likely reduce heating degree days and increase cooling degree days for Sacramento residents

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<sup>1</sup> <https://newscenter.lbl.gov/2019/07/09/cool-walls-can-reduce-energy-costs-pollution/>



and businesses. Warmer temperatures can also extend allergy season, affect phenology of native vegetation, and affect local ecology and biodiversity (including trees).

- **Extreme heat days, p.12:** We recognize that this section defines extreme heat using Cal-Adapt's 98<sup>th</sup> percentile of historic daily maximum temperature, which is 103.9°F for Sacramento. However, research shows that health impacts start to occur at much lower temperatures, particularly for people with chronic and preexisting health conditions, people who work outdoors or in unconditioned spaces (e.g., warehouses), people who lack access to air-conditioning, people who are pregnant, children, and the elderly. We advise the City of Sacramento select a lower temperature threshold (e.g., 95<sup>th</sup> percentile, which is commonly used by many scientific studies and the Centers for Disease Control) and re-run this analysis for a better understanding of heat risk.

We also recommend the City add a discussion on the increase in frequency and intensity of extremely warm nights, which are key drivers of health consequences. Warmer nights eliminate the potential for a respite from the heat, reducing the ability of the human body to cool down at nights. Households trying to reduce energy bills may rely on opening their windows at night to cool down, but during heat waves in Sacramento, nights often remain hot and wind-less, without the characteristic Delta Breeze. During the 2006 heat wave in California, which may have killed over 600 people around the state, in Sacramento the 99<sup>th</sup> percentile of historic maximum temperatures was exceeded for only three days but as many as seven nights.<sup>2</sup>

- **Heat-related illnesses, p.13:** We recommend renaming this section to heat-related health impacts, and discuss additional health consequences beyond heat illness and heat stroke. For example, heat can worsen existing cardiovascular conditions, potentially triggering heart attacks or stroke, and exacerbate respiratory conditions. In addition, extreme heat increases the risk of premature births, still births, and low-birth weight infants.

To the list of vulnerable residents, we recommend adding people who work in unconditioned spaces (e.g., warehouses that are not air-conditioned), people with chronic conditions, people who live alone, pregnant people, people who have mental health conditions, and people who are linguistically isolated. Heat, for example, is linked with an increase to emergency room visits for people with mental health conditions.<sup>3</sup>

- **Urban heat islands, p.14:** We recommend specifically calling out cool roofs as an example of high-albedo building material that can reduce the urban heat island effect, reduce building energy consumption, save money, mitigate peak electricity demand, and improve occupant comfort and safety, especially for those who lack air-conditioning or would like to reduce their electricity costs.
- **Heat-related infrastructure impacts, p.15:** It may also be worth noting that increased energy demand during high-heat days is likely to result in increased greenhouse gas emissions if utilities may need to bring on additional generation, including natural gas-fired peaker plants, or make purchases in the day-ahead market to meet demand. Blackouts and brownouts could also impact economic output.
- **Air Quality, p.20:**
  - Particulate matter from wildfire “dissipates” throughout the Central Valley – we recommend using “disperses” instead. Dissipates means to disappear or fade away.

<sup>2</sup> <https://journals.lww.com/epidem/Fulltext/2008/>

[11001/2006 California Heat Wave High Death Toll .1000.aspx](https://journals.lww.com/epidem/Fulltext/2008/11001/2006_California_Heat_Wave_High_Death_Toll_.1000.aspx)

<sup>3</sup> <https://jamanetwork.com/journals/jamapsychiatry/fullarticle/>

[2789481?guestAccessKey=689710a0-a6a0-483c-809d-0a93fb2e49ab](https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2789481?guestAccessKey=689710a0-a6a0-483c-809d-0a93fb2e49ab)

- We also recommend noting that low-income communities are more likely to be exposed to wildfire smoke as a result of housing conditions. Higher income residents are more likely to live in well-sealed homes with HVAC systems that can filter out wildfire smoke using filters with high MERV ratings. Lower-income residents are more likely to live in older homes that potentially have leakages exposed to outdoor air, and lack HVAC systems that can handle highly rated air filters. Thus, neither indoors at home nor outdoor environments provide a respite from wildfire smoke for low-income residents. Similarly, low-income residents may also face greater exposure to wildfire smoke as a result of their occupation or their mobility choices if they lack access to private cars.
- Finally, there is also an economic impact to poor air quality and wildfire smoke as more people are likely to stay at home rather than venture out to restaurants, bars, shops, and other recreational or entertainment events.

## **Chapter 2 – GHG Emissions Inventory**

- p.25: We do not find the volume analogy for CO<sub>2</sub>e employed here to be helpful in visualizing GHG emissions. We find the analogy to annual emissions of an average car to be more helpful. We suggest consulting this Massachusetts Institute of Technology resource for volume examples to help visualize a ton of carbon dioxide: <https://climate.mit.edu/ask-mit/how-much-ton-carbon-dioxide>.
- Please add clarity by providing more details on the assumptions regarding Title 24 that went into the GHG emissions forecast.

## **Chapter 6 Measures**

- **E-3 Transition Natural Gas in Existing Buildings to Carbon-free Electricity by 2045:** We commend the City for tackling the decarbonization of buildings, one of the most cost-effective and healthful measures that can be undertaken. However, we recommend a more comprehensive approach to electrifying existing buildings, including not only water and space heaters, but also other appliances, especially cooktops. While natural gas water and space heaters emit more greenhouse gas emissions than stoves, we urge the City of Sacramento to develop strategies and incentives to help support the adoption of induction cooktops for the following reasons:
  - **Improve air quality and public health:** Natural gas stoves release nitrogen oxides (NO<sub>x</sub>), carbon monoxide, formaldehyde, and other hazardous pollutants directly into the home, exposing occupants to high levels of pollutants in excess of outdoor ambient air quality standards. These impacts are greater for low-income residents, who may live in smaller homes (smaller spaces mean higher concentration of pollutants) with poorer air flow and ventilation, and lack effective range hoods (which are estimated to be used only 25-40% of the time). [Research](#) suggests children in homes with natural gas stoves have a 42% increase in their risk of developing asthma. [Another study](#) found that natural gas ovens could produce enough nitrogen dioxide (NO<sub>2</sub>) to exceed the one-hour ambient air quality standard within just a few minutes.
  - **Reduce short-lived climate pollutants:** [A new study](#) suggests that we have been substantially underestimating methane emissions from natural gas stoves. Total emissions are likely much higher, and according to the study, are not correlated to stove age or price – even new, natural gas stoves result in methane leakages. The study found that methane leaks across all phases – off, on, and ignition. Notably, more than 75% of methane emissions occurred while stoves

were off, regardless of usage patterns, suggesting that gas fittings, stove connections, and in-home gas lines are responsible for most emissions.

The study estimates that an average stove (burners plus oven) emits 649g of methane per year. Based on this new research, the City of Sacramento could likely generate additional GHG emissions reductions from including induction ranges in its electrification of existing buildings strategy.

- **Greater convenience and ease of use:** Induction stove technology is easy to use, easy to clean, and presents an improved cooking experience through efficiency and speed, fine temperature controls, and safety. While residents may not know or care what powers their space or water heater as long as functionality is comparable, it is possible to generate greater support for induction stove conversion through genuine consumer interest and excitement. For example, the lack of natural gas or an open flame can be safer for families with children – no danger of gas leaks or burned fingers. Induction stove surfaces do not heat up as much, and cool down quickly. Induction stoves also cook more quickly, saving time, and provide a cooler, healthier experience, exposing residents to less ambient waste heat and zero pollutant emissions. We believe these features lend themselves to campaigns and marketing to engage resident interest in converting to induction stoves. In addition, induction stove technology is mature, and where it is widely deployed, such as in Europe, prices are comparable or lower than natural gas stoves. With support, induction stove technology can achieve such market scale in the US as well.
- **More efficient whole-house approach:** A whole-house approach may be more efficient for electrification. It may be most effective to undertake all necessary electric conduit and panel work simultaneously, with one contractor. Complete electrification also allows residents to eliminate their natural gas bill entirely. The research cited above on the majority of gas leaks occurring from gas fittings, gas connections, and in-home lines leads to the conclusion that shutting off gas entirely is necessary to fully eliminate methane leakages. There are also equity considerations: as new homes become electric, a dwindling number of existing homes will bear the costs of natural gas infrastructure. Complete electrification centered around equity can help ensure that low-income residents are not left on aging natural gas infrastructure alone.

Thus, for the reasons above, if combined with incentives and supportive resources, a campaign around induction stoves can help to spur resident interest from the perspective of health, cooking experience, and cost. We urge the City to not only focus on space and water heaters but also develop resources, incentives, and information for converting all natural gas appliances as part of E-3, including actions E-3.4 and E-3.5.

The District recognizes that State of California funding for building decarbonization has not matched funding to decarbonize transportation, leaving much of the cost of this transition to be borne by residents and businesses. We will support the City in its pursuit for funding to help accelerate building decarbonization.

- Other E-3 comments:
  - Key Performance Indicator: As the CAAP has set target natural gas usage rates per capita, it would be helpful to include the current or baseline natural gas usage rate per person for comparison purposes. It would also be good to see additional indicators for total number of appliance conversions by category.
  - Many residents bypass the building permit process when replacing the water heater; thus, enforcing E-3.2 may be difficult. We recommend the City consider other potential mechanisms in addition to the permit process, such as a rental

inspection program to accelerate the transition of existing rental units and buildings to all-electric. This could be critical to overcome the split-incentive issue, and should be coupled with safeguards to protect tenants from displacement and gentrification. A point-of-sale requirement can also help support electrification of existing buildings.

- As natural gas rates are likely to increase in the future, building electrification is likely to result in long-term savings for residents and businesses alike.
- Indicators for individual E-3 actions should also include number of incentives provided or utilized by residents.
- **E-4 Increase the Amount of Electricity Produced from Local Resources and Work with SMUD to Install Additional Local Storage by 2030:**
  - Projects should support equity and environmental justice: In addition to locations that support grid resilience, the City should also prioritize siting solar and storage projects in low-income, historically underserved, and frontline communities. Power outages are more impactful for low-income residents (for example, they can less afford to replace a refrigerator or lost food, or have fewer backup resources). Solar-and-storage projects can also be designed to help low-income residents, such as residents of affordable housing complexes, save on energy bills, a critical equity concern.
  - We recommend the City to commit to local hiring, including hiring from low-income communities and communities of color, as part of the pilot project process. Greenhouse gas benefits from local hiring can be quantified by using the CAPCOA GHG Handbook [measure C-3 on page 372](#), while the health and equity benefits of local hiring are discussed on page 526 in measures [IEP-1 and IEP-2](#).
  - E-4.3: Performance indicators should include not only incentives created but also the number of incentives implemented/used.
- **E-5 Support Infill Growth:** Sac Metro Air District commends CAAP Measure E-5, calling for 90% of growth in the established and center/corridor communities and 90% small-lot and attached homes by 2040, and supporting actions. To ensure implementation, we recommend that the CAAP include more clarity on this measure, and incorporate tracking mechanisms into supporting action items.
  - We recommend that the CAAP provide clarity on center / corridor communities, with a direct reference to their definition and locations in the City General Plan.
  - We recommend the inclusion of an E-5 action to track implementation at the project level. This action would include an assessment of the quantity of housing available in the center / corridor communities, as compared to the quantity available in other communities, to demonstrate that 90% of housing is indeed available in the center / corridor communities.
  - This assessment would demonstrate consistency of stated target numbers in E-5 actions with actual housing availability. It could reference specific General Plan Housing Element data, and be included as a separate appendix to the CAAP.
  - Regular CAAP progress reports would measure E-5 implementation in terms of proportion of small-lot / attached housing within the clearly identified center / corridor communities. If 90% of housing is not within those areas, progress reports should determine barriers to E-5 implementation, and how to address them.
  - E-5.1: We suggest directly referencing the corresponding General Plan policies that achieve the targets listed here.

- **TR-1 Improve Active Transportation Infrastructure:**
  - Per person annual VMT reduction target, p.99: Please define how VMT per capita is calculated here. Is the annual VMT per capita metric within the City of Sacramento or the SACOG region?
  - Key Performance Indicators, p.100:
    - It's unclear how (B) connects to (E) Bicycle Master Plan; please clarify if the 30 miles of new bikeways by 2030 in (B) are included in or additional to the bike infrastructure outlined in the 2016 Bicycle Master Plan. If these 30 miles are additional, please clarify what types of bike lanes are planned, and what criteria will be used to site these bike lanes.
    - Similarly, please clarify how the 20,000 ft of proposed pedestrian infrastructure repairs or construction in (C) and the 70 pedestrian crossings in (D) relate to the pedestrian network proposed in the 2006 Pedestrian Master Plan (F). If these are additional to the proposed infrastructure in the plan, this seems like a relatively low level of ambition.
    - 2006 Pedestrian Master Plan: It is difficult to get a sense of the impact of this metric, as the measure does not provide enough context or progress update. How much of the infrastructure outlined in the 2006 Pedestrian Master Plan has already been completed, and how much remains to be constructed?
  - TR-1.1: Improvements should be targeted and prioritized for streets and intersections known to be dangerous (i.e., where previous accidents have occurred), as well as in low-income and under-served communities.
  - TR-1.2: Climate adaptation should also be considered. Sidewalk construction presents a good opportunity to simultaneously plant trees, which can help make walking a more inviting and viable choice of transportation, especially as extreme heat increases.
  - TR-1.3 and TR-1.4: These measures need to reflect that the primary obstacle to active transportation in Sacramento is vehicular traffic and safety. To encourage more active transportation, the City of Sacramento should demonstrate a greater commitment to improving bike and pedestrian safety. Sacramento ranks among the worst cities in the US for bicycle fatalities<sup>4,5</sup>. Speeding drivers, distracted drivers, drivers who charge through red lights or stop signs can all have serious consequences for pedestrians and cyclists. A lack of consequences for drivers responsible for pedestrian or cyclist deaths – a problem not unique to Sacramento or California but common across the US – reinforces the careless attitude that many drivers carry toward other users of the road. The City of Sacramento should consider how its roadway design and enforcement of traffic laws and policies could be improved to protect cyclists and pedestrians from vehicles.
  - As important as dedicated cycle paths, safe on-street bike lanes are critical to increasing ridership and helping bicycling be a viable alternative to driving. The City of Sacramento should strive to have protected and/or buffered bicycle facilities on all major routes along with parallel low-stress networks on lower volume roads and streets.

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<sup>4</sup> <https://www.abc10.com/article/news/local/stockton/stockton-sacramento-county-bicyclists/103-2fce3a00-d91b-4ee5-b0fd-3c8557093227>

<sup>5</sup> <https://bayareabicyclelaw.com/sacramento-ranked-cyclist-safety/>

- **TR-2 Support Public Transportation Improvements**
  - TR-2.6 and TR-2.7: We recommend adopting a quantifiable numeric metric here, such as annual user numbers for electric car share and other shared rideables programs, or miles traveled.
  - TR-2.11: This should extend beyond the plans discussed here and promote growth and development around transit stations – a core part of improving transit use. Transit-oriented development should be designed to have inviting street-front entrances (not set back behind a large parking lot). Ideally, transit-oriented development should focus on residential, recreational, and commercial uses to invite people in.
  - The measures here do not address affordability, part of the recommendations of the Mayors' Commission on Climate Change. There should be measures to address affordability for low-income users, including not only transit but also for shared rideables and electric car share.
- **TR-3 Achieve Zero-Emissions Vehicle Adoption Rates:**
  - TR-3.2: The performance indicator should provide details on target percentages or numbers of the DC fast chargers and Level II chargers installed. We recommend revising the indicator to provide specific numbers installed by charger type.
  - TR-3.8: This appears to be a duplicate from TR-2.9. Should this measure address curbside charging for residents without access to private parking spaces?
  - We recommend also including measures to address medium- and heavy-duty vehicles, hydrogen vehicles and refueling needs, and fleet conversion.
- **W-1 Reduce Organic Waste Disposal 75% Below 2014 Levels by 2025**
  - W-1.1:
    - This measure – focused on SB 1383 – encompasses a diverse set of actions, which may be carried out more effectively if they were separated into different measures. Procurement of renewable natural gas and compost, for example, requires different actions and metrics than establishing an edible food recovery program. Elements of this measure appear to have been directly copied and pasted from SB 1383 requirements and are highly generalized.
    - Additionally, elements of this measure appear to be redundant to W-1.4, W-1.5, and W-1.6. It's also unclear why this is a Phase 3 measure when some elements – e.g., organic waste collection – have already started, while other elements have near-term target years (20% edible food recovery by 2025).
  - W-1.4 and W-1.5: We recommend changing the metric here to tonnage of organic food waste diverted.
  - The City should consider leveraging the compost created through its organic waste diversion programs to further the City's climate change and environmental justice goals, such as by providing free compost to community gardens and residents (to support local food and equity). Ideally, City-generated compost can also supply the compost required in CS-1.2 for a circular economy.
- **WW-1 Reduce Water Utility Emissions by 100% by 2030**
  - We recommend adding another Key Performance Indicator – per capita water usage, which will make it easier to align with statewide targets for water use.

- **WW-2 Reduce Wastewater Emissions 22% by 2030 and 40% by 2045**
  - The California Air Resources Board's Draft 2022 Scoping Plan recommends developing co-digestion at wastewater plants as a potential facility to help support organic solid waste diversion targets. The City should work with Regional San to explore the potential of building or expanding existing digestion facilities to handle diverted organic solid waste.

### **Chapter 8 Implementation and Monitoring**

- We would like to see more detail on city role in implementation and monitoring. Will each department track its own metrics? There should be also efforts to track funding in the budget to make sure climate action measures are adequately funded.
- Businesses, p.136: We recommend the City to address opportunities for additional workforce development as part of building electrification, including the need to provide training.
- Funding and Financing, p.137: A discussion of costs and savings should also briefly mention positive externalities and social benefits that accrue from climate action measures. For example, improved air quality and increased physical activity through the CAAP's suite of transportation measures can lead to greater public health, lower healthcare costs, and avoided lost work productivity.
- Incremental costs, p.138: The discussion on reduced long-term operating and maintenance costs of electric vehicles when compared to their internal combustion engine counterparts should also mention the significant savings in refueling costs. Even prior to the current increase in gasoline prices, charging costs for EVs are significantly lower than gasoline costs. Charging an EV is estimated to be about [3.5 times cheaper per mile](#) than refueling a gasoline car.
- Monitoring the CAAP, p.141: The CAAP notes in two places that the City will inventory GHG emissions annually, and in one place that it will be every two years.
- Table 8-2, p.143: On page 82, it notes that Phase 3 measures will begin implementation in 2025, but this timeline appears to suggest that Phase 3 implementation begins in 2027.

### **Chapter 9 Community Action and Sustainability**

#### **Residents**

- Active transportation, p.147: If the City would like to encourage people to skateboard as a means of transportation, the City should work with the County of Sacramento to allow skateboarding along the American River Bike Trail and other County facilities. Additionally, this section could also include electric bikes.
- EVs, p.148: This section should mention specific State of California and local funding programs that can help to reduce the cost of buying or leasing an EV, including the Clean Vehicle Rebate Project (CVRP) and the California Clean Fuel Reward. There are also specific programs available to low-income residents, such as Clean Cars 4 All. SMUD offers incentives for at-home charger installations. It may be also worth noting that, depending on one's driving needs, it is also possible to charge EVs using a standard wall plug, albeit slowly – reducing the up-front costs of EV ownership.
  - Links to Resources: Some of the suggested links here, such as an article on "Explore a list of affordable electric vehicles on the market," are likely to become out of date quickly as newer models are released. There are many useful and comprehensive resources that could be added here to provide more information for residents:

- **PlugStar:** Helps people to choose the right EV for them, and provides localized information on available incentives, test drive events, electricians, and chargers. SMUD is a partner. <https://plugstar.com/>
- **CVRP:** <https://cleanvehiclerebate.org/en>
- **Clean Cars 4 All** – incentives for income-qualified residents living in disadvantaged communities in Sacramento  
<https://www.airquality.org/SacCleanCars4All/Pages/default.aspx>
- **California Clean Fuel Reward** – an upfront rebate for all Californians on the purchase or lease of a qualified EV. Also provides a guide to EVs  
<https://cleanfuelreward.com/>
- **PlugShare:** Comprehensive charging station map, with information for all charging networks and plug types. <https://www.plugshare.com/>
- **DriveClean:** Guide to buying the right EV. <https://driveclean.ca.gov/>
- **Compost your food waste, p.150:** This section should be updated to provide more detailed information on how residents can participate in the City’s new organic waste collection program, which will likely be feasible for many more residents than doing their own composting. The link “Curbside composting program starting in 2022” should be updated to reflect that the program is already active.
- **Induction burner, p.151:**
  - This section is about portable induction stoves, but the illustration shows a built-in induction cooktop. Clarify in the second sentence that this section focuses on portable induction stoves that can be adopted by renters, with information on built-in induction cooktops provided in the homeowners section. Another alternative is to have only one section on induction stoves for both homeowners and renters, and thus avoid duplication of information on the air quality impacts of natural gas stoves.
  - Recommend renaming this section and refrain from using the phrase “induction burner” as there is no burning – heat is transferred by electromagnetic induction. Use of the word “burner” may be confusing.
  - Ideally, this section could provide additional information on natural gas stoves’ direct impact on air quality within the home. Suggested rewrite:

In Sacramento, natural gas use equates to approximately 14 percent of the City’s emissions and reducing these emissions is essential to reaching the long-term goal of carbon neutrality. One opportunity to reduce natural gas usage in homes is by switching from a gas-powered stove to an induction cooktop (portable or otherwise) burner, which can also improve indoor air quality and could make your home healthier by reducing hazardous emissions from natural gas use. ~~According to CARB,~~ natural gas and propane stoves and ovens can release carbon monoxide, formaldehyde, nitrogen oxides, and other harmful pollutants, which can lead to asthma and exacerbate respiratory and cardiovascular conditions. into the air, which can be toxic to people and pets.<sup>5</sup> ~~Furthermore, a~~ 2020 report from Rocky Mountain Institute<sup>6</sup> found that peak indoor air pollution from gas stoves can reach levels as much as five times higher than the legal outdoor limit. The report also notes that children living in homes with natural gas stoves increase their risk of

<sup>6</sup> <https://rmi.org/insight/gas-stoves-pollution-health/>



developing asthma by 42%. Lower-income homes are at greater risk, due to smaller living spaces and poorer ventilation. Thus, because natural gas stoves generate emissions directly into the living space, converting to an induction cooktop provides a significant and direct improvement in indoor air quality. In addition, induction cooktops also heat much more quickly than gas stoves and offer more temperature controls, which can improve the cooking experience.

- The range in price cited for portable induction cooktops appear to be not accurate. It may be better to say that “Induction cooktops generally start in price at \$40-\$75...” as there are multiple models over \$80.
- Talk to Your Landlord or Property Manager and Ask for Sustainability Upgrades, p.153: This section does not accurately reflect the dynamics of the landlord-tenant relationship for residents. Commercial leasing is varied (triple net, class A, etc) and substantially different than residential renting, and the lessons cited in the EPA’s study do not cross over easily to residential tenants. To be more realistic, this section needs to address the split-incentive challenge – landlords would be responsible for infrastructure and appliance upgrade costs, while residents would enjoy the benefits of utility savings – and as a result, many landlords are not sufficiently motivated to undertake these retrofits. With trends indicating more corporate and absentee landlords, even simple tenant requests (such as trash-can size from solid waste) can be difficult to execute, let alone non-mandated retrofits and upgrades. Instead of relying on renters to take the initiative, the City should take leadership and require electrification and energy retrofits as part of a broader rental licensing program, such as the one implemented by Sacramento County, which requires inspections to ensure code compliance and inhabitability standards.<sup>7</sup> Adopting a similar rental licensing program, with the addition of reasonable and progressive climate requirements, would create a more comfortable and safe housing stock for the City’s renters while helping to advance its climate goals.

Additionally, landlords that do upgrade their property may choose to pass these costs on in terms of higher rents to tenants, potentially pricing out lower-income residents, leading to gentrification and displacement. The City could develop additional safeguards and policies to protect tenants so rent increases do not outpace utility cost savings.

#### **Homeowners:**

- **Install an Electric Water Heater, Heat Pump HVAC, and/or Stovetop**, p.155
  - This section should start with a clear overview of the types of alternatives available to homeowners to help them understand the options.
  - Include information on the air quality benefits of electrification, especially for pollutants inside the home, either by referencing the induction stove section for renters or by repeating some of the key points (e.g., children in homes with natural gas stove have a 42% increase in their risk of developing asthma, homes with natural gas stoves have a 50-400% higher indoor concentration of NO<sub>2</sub> than homes with electric appliances<sup>8</sup>, even a few minutes of natural gas range and/or oven use leads indoor concentrations of NO<sub>2</sub> to exceed national ambient air quality standards<sup>9</sup>).

<sup>7</sup> <https://code-enforcement.saccounty.gov/Programs/Pages/RHIP.aspx>

<sup>8</sup> <https://rmi.org/insight/gas-stoves-pollution-health/>

<sup>9</sup> <https://pubs.acs.org/doi/10.1021/acs.est.1c04707>

- Include electric dryers as an option for homeowners to electrify.
- Hyperlink for Search SMUD's Contractor Network does not work
- We recommend including an additional strategy for homeowners: install cool roofs. Cool roofs reflect incoming solar radiation away from buildings, helping to naturally cool interiors during hot summer days, providing occupant comfort, reducing air-conditioning load and thus also energy costs, and supporting public health. If adopted at scale, cool roofs can reduce the urban heat island effect and reduce peak demand, increasing grid stability. Cool roofs are comparable in cost or slightly more expensive than conventional roofs, but they can help save 20 percent on summer air-conditioning costs.
 

Cool roofs come in a range of colors and styles, and are not necessarily a light color; the key criteria is their solar reflectance (also known as albedo), or the percentage of solar heat reflected. Homes with a steep-sloped roof should select a cool roof with solar reflectance of at minimum 0.25 (solar reflectance index of 23), and homes with a low-sloped roof should select a cool roof with solar reflectance of at least 0.63 (or solar reflectance index of 75). This is in alignment with the 2022 Title 24 requirements for roofing materials for Sacramento's climate zone, under the prescriptive compliance approach ([CEC](#)).
- Another additional measure for homeowners is a broad recommendation for energy efficiency upgrades and building weatherization.

### **Chapter 10. Municipal GHG Reduction Measures**

- We recommend the City categorize municipal mitigation measures and actions by timeframe, similar to the near-, mid-, and long-term action categorization for the community GHG reduction measures.
- We recommend the City incorporate key performance indicators and target indicators for each of the municipal mitigation measures and their supporting actions.
- **MM-1 Reduce natural gas 50% below 2016 levels by 2030 and 100% by 2045:**
  - We recommend re-organizing and re-classifying some of the actions within Measure 1 for a more logical flow. For example, Measure 1.11 Electrification Study should precede or be part of Measure 1.2 Building Retrofits – develop a study to transition 100% of existing municipal buildings to electric.
- **MM-2 Electrify or decarbonize 100% of light-duty fleet vehicles by 2035 and 100% of municipal fleet by 2045:**
  - The City should clarify if its strategy is to replace vehicles at their end-of-life or as technology becomes available, particularly for medium- and heavy-duty vehicles.
  - MM-2.4 Hybrid Phase-In: This strategy should also factor in other alternatives besides all-electric and hybrid for medium- and heavy-duty vehicles: if all-electric is not available, the City should evaluate a preferred ranking that includes hydrogen in addition to hybrid.
  - We recommend crafting a separate medium- and heavy-duty vehicle decarbonization strategy, independent of MM-2.1. Zero-emissions medium- and heavy-duty vehicle technology is at a considerably different maturity level than light-duty technology, and will require different timeframes, partnerships, strategies, and infrastructure to transition away from fossil fuels. A dedicated strategy would allow for separate timelines, targets, and implementation actions for medium- and heavy-duty vehicles.
- **MM-3 Reduce emissions from work-related trips by City employees:**
  - We suggest combining this measure with Measure 8.

- **MM-5 Reduce emissions from water usage/conveyance and stormwater drainage:**
  - MM-5.4: Instead of artificial turf, we encourage the City to adopt a strategy to water its playing fields and park spaces with graywater, recycled water, or otherwise reused water. While artificial turf may conserve water, it has a host of negative environmental and health consequences. Artificial turf decreases precipitation infiltration, reducing recharge and increasing stormwater run-off. Artificial turf also reaches very high surface temperatures—[up to 140F to 170F during a hot sunny day](#)—not only worsening the urban heat island effect, but also risking the health of users and decreasing the playable hours of sports fields. In addition, synthetic turf is often made of plastic, a petroleum byproduct, and results in the release of microplastics into the environment.
 

Natural turf, on the other hand, can help to cool cities, reduce the urban heat island effect, infiltrate precipitation, and support biodiversity. We urge the City to evaluate the impact of artificial turf across all environmental variables, not just water use. To mitigate water demand of playing fields, the City should consider committing to only watering fields with graywater and recycled water, converting to drought-tolerant turf varieties, minimizing turf throughout public properties, and installing smart irrigation control devices. The City could also consider adopting a capital improvement plan to connect parks, playing fields, and other properties and pipes to the existing recycled water pipeline from Regional San.

### **Appendix C**

- We appreciate the City taking a conservative approach in demonstrating consistency with State targets and acknowledging the difficulty of reducing VMT by providing separate estimates of GHG emissions reductions without VMT reductions. It is critical to have a realistic approach to emissions reductions that recognizes existing challenges, and we are confident that the City's continued pursuit of infill-oriented development will produce healthier, more livable neighborhoods where people walk, bike, and take transit to meet their daily needs.
- Measure E-2: Please provide details on the assumptions used when calculating increase in electricity usage due to all-electric appliances for the period from 2023-2030, before SMUD's electricity emissions factors goes to zero.

### **Minor/formatting-related comments:**

- **Figure 1-1, Mayors Commission on Climate Change Recommendations:** The intro text for Built Environment needs to be updated. The third Health & Equity strategy should be updated as well.
- **Figure 1-2, The Science of Climate Change:** This graphic could be improved to emphasize the differences between our historical and current climate conditions
  - Visually, there is not enough difference in the atmospheric portion of this graphic. In the righthand image (increased GHG emissions), the arrow of radiated heat escaping earth is identical to the historical/normal scenario, and is far more prominent than the trapped heat arrows reflecting back onto the earth. It would help to visually emphasize the difference between the two scenarios by removing the radiating/escaping arrow, and increasing the prominence, color, or size of the trapped arrows of heat bouncing back into the earth.
  - It would be helpful for the text on the left to mention that these are the stable climate conditions under which all of human civilization has developed, and now we are entering climate conditions that the Earth has not seen in 125,000 years.

A small rise in temperature sounds small but in fact the Earth's climate has been remarkably stable over the Holocene (the past 11,000 years), and is driving our system beyond the norm.

- "In the last century" could be interpreted as the past 100 years, or the last century (20<sup>th</sup> century).
- **Figure 2-5**, p.31: It does not seem to make sense to depict the 2016 emissions inventory as a constant line over time.

We would like to thank the City of Sacramento for your hard work in preparing this preliminary CAAP, and look forward to reviewing the full draft, including the climate adaptation chapter, when it is released in the autumn. The Sac Metro Air District is excited to build on our strong partnership with the City of Sacramento to lead the region in planning and implementing ambitious, forward-looking climate strategies.

We appreciate your attention to these comments. If you have any questions, please contact Shelley Jiang at [sjiang@airquality.org](mailto:sjiang@airquality.org) or (279) 207-1132.

Sincerely,

A handwritten signature in black ink that reads "Paul Philley". The signature is written in a cursive, slightly slanted style.

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

CC:

Shelley Jiang, Sac Metro Air District  
Molly Wright, AICP, Sac Metro Air District

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Edith <b>Last Name:</b> Thacher
<b>Email</b>	██████████
<b>Message</b>	Attached please find Sacramento CCL's comments on the city's CAAP.
<b>Upload File(s)</b>	CCL Sacramento Comments to Sac City PD CAAP July 30 2022.pdf



July 30, 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

Dear Ms. Venema:

Thank you for the opportunity to submit comments in response to the City's Preliminary Draft (PD) of its Climate Action & Adaptation Plan (CAAP). 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 over two years ago. We also commend the City for setting a variety of climate goals. However, we are extremely concerned that despite having set these goals, the PD does little to actually implement them. Without bold actions backed by funding and measurable goals, the CAAP has little meaning and Sacramento will not achieve the results we need for a livable future.

As drafted, the PD is largely self-congratulatory rhetoric with little substance. It is not enough for the City to simply claim climate is a priority and then not follow through. So far, the City has shown little interest in committing resources and taking bold action despite having received the MCCC's recommendations over two years ago. The PD as drafted is another example of the City's failure to take climate change seriously.

We ask that serious consideration is given to our comments and the PD be revised to address our concerns and those of other local environmental groups who will be submitting recommendations we support. These include the Sierra Club, Environmental Council of Sacramento, and 350 Sacramento. We also ask that you post on your website any and all

comments on this and future drafts as they are received so that they can be accessible to the public, rather than requiring each organization or individual to make separate public record requests to gain access to them.

In reviewing the PD, we felt it important to examine the goals and guidelines the City has established to determine whether the PD will actually result in achieving them:

Here are the goals to which the City has committed:

### Stated Goals in PD

- (1) “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.
- (2) 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 PD should be equitable and provide the most opportunity for our most vulnerable residents.**
- (3) Transportation is identified as a major emissions contributor; 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 Active Transportation (AT) and Transit & Shared Mobility (TSM) are the keys to achieving carbon neutrality by 2045, a date too far out to have a significant impact on the wellbeing of residents in the coming decade.

### December 2019 - Sacramento City Council Emergency Declaration

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).

To achieve this goal, the City must set and meet ambitious targets.

### Guiding Principles for 2040 General Plan Update

- (1) “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,”
- (2) “strengthen connections between Sacramento neighborhoods, to neighboring communities, and to the wider region by expanding and enhancing the range of transportation options for people of all ages and abilities,”
- (3) “reduce reliance on single-occupant vehicles, prioritize and promote active transportation and, high-occupancy transport,” and
- (4) “recognize that traffic deaths and serious injuries are a public health issue and, with the goal of reaching zero traffic by 2027 through the Vision Zero initiative, the City will make safety of human life the City’s highest priority, taking proactive, preventative steps” (2021-01419)

These are laudable goals; however, we do not see how they are addressed or achieved with the plan set forth in the PD.

In reviewing the PD, we rely in part on certain regulatory requirements in our analysis and state guidance provided by the Governor's Office as follows:

Regulatory Requirements:

14 CCR § 15183.5 sets forth the requirements for a CAP. 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.

State Guidelines:

Chapter 8 of the General Plan Guidelines prepared by the Governor's Office of Planning and Research (OPR) (<https://opr.ca.gov/>) provides clear guidelines for CAPs which can be found at [https://www.opr.ca.gov/docs/OPR\\_C8\\_final.pdf](https://www.opr.ca.gov/docs/OPR_C8_final.pdf).

**I. The PD should outline the City of Sacramento's Plan to play a Bold and Decisive Role to reach the City's Goals and Address Climate Change**

In order to meet the City's own goals, the CAAP must have strong clear actions with measurable outcomes and tangible results.. Instead, the PD portrays the City as an entity that will "encourage," "conduct studies," and "support" community partners as common actions but PD includes no well-defined implementation plan for many of the goals defined in this document. The PD reads largely as a summary of how things might play out in Sacramento, but



relies on other governmental, commercial, and non-profit entities to act. The role of the City is largely supportive and altogether lacks bold, decisive plans to implement change.

For example, the City looks to SMUD to provide carbon free electricity, the SMUD/Sac Tree Foundation is largely responsible for expanding the urban forest, and the state is relied upon to provide future initiatives and direction re EVs, appliance efficiency standards, etc. Further projected gains include efficiencies achieved through the development of unspecified technologies, with examples including EV technology and the efficiencies of future appliances.

We want to see a CAAP that includes specific measures that can be executed by the City through the exercise of its authority and are not dependent upon the actions of others. We want to see a commitment to the radical change warranted by the City's declaration of a climate emergency. We want detailed actions that will directly affect our local environment.

## **II. The PD Does not Provide the Required Substantial Evidence that the Measures will Result in the Proposed Reductions**

Under 14 CCR § 15183.5 ( B ) (1)(B) a CAP must: "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..." Emphasis Added.

This requirement is also discussed by the OPR guidelines:

Feasibility and Enforceability CEQA Guidelines sections 15168(b)(4) and 15168(c)(3) recognize that programmatic documents like a general plan or CAP provide an opportunity to develop mitigation plans that will apply on a project-specific basis. As a result, a CAP needs to include measures that will achieve the reduction target. **How the plan achieves those targets, whether through mandatory or a mix of voluntary and mandatory measures, is up to the lead agency, so long as substantial evidence supports the conclusion. When addressing greenhouse gas emissions, like all other technical analysis, the 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.** A number of published court cases address the need for feasible and enforceable emission reduction measures. (Id. at p. 94).

The "evidence" provided in support of proposed actions in the PD is generally not quantifiable, and sometimes casts doubt on the efficacy of the proposed action. In other instances, the "evidence" is an assertion that the proposed action will yield results with no basis. To meet the requirements of CEQA, the PD should include clear and quantifiable actions coupled with valid projected benefits.

For example:

**"Action TR-1.2 Evidence:** *"...not much research has been conducted to determine quantitatively how improving the pedestrian network translates to increased pedestrian mode share. This is further complicated by the fact that while improved pedestrian networks almost always have a positive correlation with increased walking, that does not always translate to*

decreased VMT. In other words, increased walking does not mean that walking trips are replacing driving trips....” (Appendix C, page 21).

**Action E-4.3 Evidence:** “...it’s hard to know exactly how effective promotion and incentives for residential battery storage and on-site solar will be” (Appendix C, page 15)

**Action TR-1.4 Evidence:** “Providing education on the benefits of active transportation as well as technical information such as trip planning, incentives and other programs will help generate momentum around active transportation and support overall VMT reduction.” (Appendix C, page 21)

Evidence is proof. Evidence is provided to substantiate a proposed action, to demonstrate the value and reasonableness of it. It isn’t an asserted belief. Much of the evidence provided in the PD is highly speculative and fails to justify proposed actions.

We find it especially concerning that contradictory indications/doubts are included in the body of report and labeled as “evidence.” Why would the city plan to devote resources under these circumstances? The PD should not count projected gains from actions lacking established validity. If an action is experimental, but looks promising, it should be presented that way, and the plan of action should reflect the experimental nature of the action with close monitoring, etc. Wishful thinking shouldn’t be characterized as “evidence” to support it.

Many of the proposed measures provide detail regarding the end goal (and associated gains) but no specificity in the actions planned to achieve them. As a result, there is not a credible relationship between the planned action and the projected benefit.

An example of this is TR-2.3. The increased ridership goals of TR 2 are clear. The planned actions are not. “Encourage SacRT to provide frequent, reliable transit in the City’s priority corridors to reduce VMT and support SacRT implementing priority transit corridors. Coordinate transit priority corridors with consideration of transportation needs as well as land use planning to provide transit-supportive land uses. Encourage the expansion of frequent, reliable transit services throughout the City.” (Appendix C, page 22).

The above “actions” read as general intentions or attitudes to be adopted by the city. As they are not quantifiable or specific, the projected reductions are not reliable, nor can they be monitored.

### **III. Unfunded Proposals Cannot Be Relied On To Mitigate Impacts From the General Plan Update**

The CAAP is being updated as part of the mitigation plan for the City’s General Plan Update. The PD does not identify any funding sources for the proposed actions. These measures are meaningless unless there is funding to implement them. Under CEQA, an unfunded measure cannot be relied upon to mitigate environmental impacts resulting from a general plan update. *Sierra Club v. County of San Diego* (2014) at 231 Cal. App. 4<sup>th</sup> 1152, at 1164.

### **IV. Many of the Proposed Actions in the PD Fall Short and Miss Key Opportunities to Reduce GHG emissions.**

#### **A. Infill Housing**

The stated goal of infill housing is to “Focus 90% of the city’s infill growth into established and center/corridor communities with the goal of achieving 90% small-lot single family and attached homes by 2040” (E-5.1). Unfortunately, this growth, as currently planned, will generally be in suburban neighborhoods which are not active or public transit friendly. Without building with these forms of transportation in mind, the City’s transportation emissions will continue to grow.

**Under Action E-5.2. the City will** “Enable development of 29,000 new high density/intensity (i.e., 30 dwelling units per net acre), by 2040 through the continuation of the City’s ministerial/staff-level review of infill housing, reduced fees, and identification of local funding sources.” (Appendix C, page 17)

It is unclear what “enabling” entails, so how can it be relied upon to achieve a result? The City should adopt very specific and far bolder actions that can be executed in a shorter time frame to address the looming crisis. For example:

- fast-track infill project application
- specific and significant fee reductions for infill projects
- fast-track plans for subdividing in-town land parcels
- restrict development to infill projects
- declare a moratorium on non-infill projects

Restricting future development to infill projects would signal to developers that Sacramento is ready to make changes. It would directly impact traffic patterns and reduce VMT. Fee reductions and incentives for infill projects would show that the City is serious.

The personal experience of one of our members with infill projects has not been encouraging. She found working with the City confusing, unpredictable, and somewhat arbitrary. She currently owns a parcel of land she had intended to subdivide to initiate an infill project. She has been discouraged from taking any action because of the timeframe involved, and uncertainty regarding City approval. It is within the power of the City to actively support infill development and to recognize that encouragement for infill needs to be offered to developers both large and small.

The PD states that City will “Enable development of 29,000 new high density/intensity (i.e., 30 dwelling units per net acre), and public transit accessible residences (i.e, within 0.5 miles of public transit) by 2040 through the continuation of the City’s ministerial/staff-level review of infill housing, reduced fees, and identification of local funding sources,” and “Enable the development of 8,700 new affordable by design units by 2040 within 0.25 mile of public transit by updating the City Code to allow multi-unit housing alternative housing types (such as dormitories and smaller units) and streamlining the permit process. Couple with anti-displacement policies and programs” (E-5.2, 5.3). While these residents will be closer to transit connections, walking paths and bike lanes are not a stated priority around these residences. No transportation network is established for these goals which limits how much of an impact they will have on GHG as it relates to transportation. Other than the proposed goals, the PD does not provide a solution for obstacles surrounding infill growth, and it conspicuously leaves out specific details of how the transportation will be designed around the residency beyond being “within 0.25 mile of public transit.”

To make an impact on residents and reduce/eliminate the need for privately owned vehicles, Smart Growth America’s “Dangerous by Design 2022” report states **“local and regional agencies must consider the impacts of land use on pedestrian safety, namely the requirements that homes be placed far from jobs, groceries, retail, banks, and other essentials.** Land use and zoning rules should prioritize development patterns that make it possible for more people to live closer to essential goods and services” (pg. 18). Sacramento needs more housing, and we also need **equitable housing that places necessities near our homes.**

The PD does not go far enough when suggesting creative solutions for new infill growth. Instead, it focuses on the same goals that got us into the housing crises: Building more low-density housing in R1 zoning.

Our focus should be on medium to high density hubs of mixed zoning to accommodate the daily needs of residents. We recommend that the City takes bolder action to combat the housing crises and climate change:

1. Infill in underutilized parking lots throughout the City, creating housing increasing revenue generation and reducing VMTs by encouraging AT in these locations,
2. Create infrastructure throughout the City that prioritizes AT by building paths that connect infill areas to essential services, and
3. Incorporate all necessities of life within one mile of housing with adequate green transportation opportunities to access necessities such as groceries, retail, banks, jobs, and other essentials (will reduce VMTs)

**V. Short-term Priority Measures, While Important, Will Not Alone Achieve the Results Required**

The PD report identifies 4 Short-term Priority City-Led CAAP Measures. The selected measures are characterized “high-cost” and as the **“most critical to achieving the overall community and CAAP goals...(priority to) focus available funds on those CAAP actions that will have the greatest impact on GHG reductions...”** (Appendix D page 18, 20). We have concerns regarding the selection of TR-1.1, TR-3.2, and CS-1.1 as priorities because they lack substantial evidence that these actions (as proposed) will result in the reductions needed. They must be part of a comprehensive plan for active and public transportation. The PD does not include planned actions known to significantly increase public transportation ridership. More important, the PD does not identify any far-reaching actions necessary to impact transportation patterns, such as bold land use changes, transportation incentives, or focused partnerships with other entities.

**A. Implementation of the Master Bicycle Plan Must be Part of a Comprehensive Transportation Plan that will Result in a Shift to Active Transportation and Needed GHG Reductions**

The City has established that transportation is a major factor in Green House Gas (GHG) emissions; additionally, several quality of life, health, and safety factors have been linked to Privately Owned Vehicle (POV) use. To achieve and surpass the stated equity goals of the CAAP, the City must enact the goals established in the Guiding Principles for 2040 General Plan Update and the Vision Zero Plan, as a minimum, as soon as possible. The reasons that

POV are such a key aspect of life in Sacramento is **Sacramento residents do not have access to safe, reliable streets to walk or ride on, and transit is not reliable, predictable, and convenient.**

**Under TR 1.1, the PD proposes significant reductions in VMT resulting solely from implementation of the Bicycle Master Plan, but with only anecdotal evidence to support its predictions.** In doing so, the PD draws from the experience of other cities.

*“The City of Antwerp reported 29% mode share for bicycles in 2014. 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 in 2014. “... it should be noted that these European 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 page 20)”* In the absence of these additional crucial factors, the experience of European cities can't be considered an accurate predictor of Sacramento's success. This is not the required substantial evidence this action alone will result in the projected VMT.

While we support implementation of the Bicycle Master Plan, it must be part of a more robust and comprehensive plan to increase (AT). Taken in isolation, there is no evidence it will achieve the needed (or projected reductions).

At the February 8, 2022, Sacramento City Council Transportation and Climate Workshop *Building a Low Carbon Transportation System: Lessons from Seattle* - Speakers presented to the City Council how Seattle achieved safer streets and incentivized AT in a relatively short timeframe. Solutions include immediate, low-cost improvements such as leading signals at pedestrian crosswalks and slower speed limits on all or many major roads.

At the Workshop, AT was cited as a key aspect of any plan for the City to reach its climate goals, **“the City will not be able to reach climate change goals to significantly increase active transportation and transit mode share without identifying significant new additional transportation funding sources”** (2021-01419, 5). “The City's infrastructure is needed to upgrade, rebuild, and connect the existing infrastructure to **create a transportation network that supports mobility options for pedestrians, bicycles, and transit as conveniently as automobiles**, thereby supporting travel options that are more climate supportive...” (6).

Additional improvements that would lead to a significant GHG reduction are completing Sacramento's bikeway superhighways, completing the bikeway network within 4 miles of Central City, and Building the Stockton Blvd. bus lane. **“Transportation improvements to reduce climate impacts are critical”** (7)

City staff also presented the *Quarterly Update on 2021 Climate Implementation Work Plan* reiterating that the “City Council has prioritized rapid action and leadership for climate change...’maximum feasible efforts to implement emergency-speed carbon reduction actions towards eliminating emissions by 2030 as much as possible” (2022-0233, 3). To accomplish this, the plan stresses that removing “barriers to walking and biking” based on the Vision Zero plan is critical to the success of this plan(2022-0233, 11). To achieve this, “new policy to prioritize pedestrian and non-auto travel at the top of the hierarchy,” and they recommend “options and business case for car-free districts” (12). These initiatives also must include “focus

on under-canopied neighborhoods” to encourage and increase resident participation in active transportation (17).

During this meeting dozens of residents called in support of these changes and demanded bolder and more immediate actions than those outlined in the resolution, and the mayor called for **bold action**. Unfortunately, the City has done nothing further to address these concerns.

### **B. VMT Reduction Goal:**

The most cited and important statistic presented in the PD is reducing VMT from 8,471 miles per person, to 6,393 miles per person in 2030 (24.6% reduction), and to 5,625 miles per person by 2045 (32.6% reduction).

To make significant reductions in our transportation GHG and improve our air quality, we must go further than a nearly 33% reduction of VMT. A national study cited in the original recommendations for this CAAP found that approximately 21% of trips made were 1 mile or less, which would account for nearly 1,780 miles per person per year and can easily be shifted to AT if the right infrastructure is put in place. Additionally, a daily commute of 20 miles per day would account for 4,900 miles that could be easily replaced by Active or Public Transportation if made safe, predictable, and convenient.

TR 1.2 proposes deploying “30 miles of new bikeways by 2030,” “Implementing 2016 Bicycle Master Plan by constructing 40 miles of bike lanes, 48 miles of bike routes, 40 miles of buffered bike lanes, 18 miles of separated bikeways, and 127 miles of shared-use paths by 2045,” and installing or improving “at least 70 new pedestrian crossings by 2030.”

To realize this increase in bicycle routes, the PD calls for the implementation of two major plans, Bicycle Master Plan created in 2016, and the Master Pedestrian Plan, created in 2006. In that time, the City has demonstrated in their inaction that AT is not a priority. **These projects are necessary to engage residents to start walking, biking, or rolling to their destinations**, and the time frame set by the CAAP will impact the public’s wiliness to use and adopt these new behaviors. Residents, especially our underserved communities, experience the impact of poor air quality, decreased wealth by being forced to own a POV (cost of use and maintenance), and must forego the exercise that is a byproduct of AT.

The plan recommends conducting “a study to identify the physical barriers to active transportation by 2025 and remove them by 2030 to support local partners and community groups” (TR-1.3) to identify problems, and will implement another study “to identify educational barriers and provide education and outreach to the community on active transportation options in the City including a travel training program and incentivize a spectrum of transportation options that includes public and private shared and active services” (TR-1.4). Such studies are not needed, instead the City must act as the cause is clear:

### **C. Sacramento Residents Do Not Have Access to Safe, Reliable Streets for Walking or Riding, and Public Transit is not Reliable, Predictable or Convenient**

Smart Growth America’s “Dangerous by Design 2022” report identified Sacramento-Roseville-Folsom as #27 on their Metro Data list with 296 pedestrian deaths between 2016 and 2020. Between 2019 and 2020, this region saw a 39% increase in pedestrian deaths. Even without these numbers, residents know why they can’t choose AT:

Our City roads are constructed wide to accommodate high speed traffic, sidewalks are broken, incomplete, and narrow, there are few pedestrian crossing, bike lanes are unmaintained, and on many low-income streets, there is very little tree cover.

Every resident of Sacramento understands, consciously or unconsciously, that the City has built our roads with only one goal in mind: Move Privately Owned Vehicles Fast. Any other means of transportation has been an afterthought.

People need to move in their day to day lives, and these statistics show that people aren't choosing to drive to work or to stores that are close to their homes; **the City forces them to drive to do anything in Sacramento** because there are extremely limited safe and comfortable alternatives available.

Addressing the obstacles that impede pedestrian comfort with AT will make a significant on GHG from Transportation. Obstacles include:

1. The most dangerous streets: "design [of streets] can be more influential on behavior than speed limits," "streets regularly intersect [streets], but lack crosswalks or signals," "marked, signalized crosswalks are located as much as 0.4 miles apart," and "sidewalks exist, but as an afterthought"; **when a POV's speed is valued over pedestrian safety, fatal accidents will occur.**
2. "Low-income communities are significantly less likely to have access to parks and other opportunities for safe recreational walking and are less likely to have sidewalks, marked crosswalks, and street design to support safer, slower speeds. Lower-income neighborhoods are also much more likely to contain major arterial roads built for high speeds and higher traffic volumes at intersections, exacerbating dangerous conditions for people walking" (p. 9). **This means low-income residents, who may not be able to afford a POV and must use AT and transit, are the most affected by car caused fatalities because the City has overlooked these forms of transportation in the past.**

The Smart Growth America's "Dangerous by Design 2022" Report recommends a few principals that would significantly reduce these fatalities and could be implemented immediately:

1. Reducing car caused fatalities is a major key to encouraging active transportation in our community. "Slow traffic speeds can be obtained by narrowing lanes, creating tighter curves, and reducing or eliminating clear zones" (pg. 13).
2. It is recommended that each city "should adopt and implement their own Complete Streets policy and NACTO design guidance to prioritize the safety of all road users and set safe speed limits on their roadways" (p.18)

Another measure that helps address why residents do not choose AT is the Vision Zero Action Plan. On January 19, 2017, the City Council adopted Resolution No. 2017-0032 with a goal that "The City of Sacramento will work collaboratively in a data-driven effort to eliminate traffic fatalities and serious injuries by 2027," adopting the plan on August 14, 2018. This plan identifies that speed is a major factor in car caused fatalities. Vision Zero was selected by the City because they state they are "constantly working to increase the availability of safe and comfortable multi-modal transportation choices for all residents, helping meet its goals to reduce carbon emissions, improve public health through increased physical activity, and improve quality of life for everyone" (p. 7).

The Vision Zero Action Plan recommended similar solutions to the Smart Growth American report. Effective countermeasures include Street narrowing, road diets, leading pedestrian/ bicycle intervals, parking restrictions near intersections, extended pedestrian crossing time/ pedestrian detection, separated bikeways, buffered bike lanes.

**To make a significant impact on GHG caused by transportation, the City of Sacramento needs to immediately implement measures that discourage use of POVs, and significantly incentivize walking, biking, and rolling.** This plan fails to do so because it is not committed to making changes in a timeframe that would have an impact on the climate crises we're facing, and it does not recommend new and expansive AT infrastructure that prioritize pedestrian safety and AT. The City must immediately implement:

- Bicycle Master Plan, with significant expansions
- Pedestrian Master Plan, with significant expansions
- Slow POV speeds on **all** streets
- Leading pedestrian signals
- Convenient and safe crosswalks everywhere
- A built environment for people, not cars

When pedestrians are the transportation priority, the City will be able to make a significant impact on VMTs.

#### **D. Public and Shared Mobility**

The current measure for transit use in the PD is “approximately 2 percent [2016]. The CAAP calls for increasing active transportation mode share to 6 percent by 2030,” but the plan does not provide a clear path to increasing ridership outside of “partnering” with SacRT, nor does it provide specifics on what is measured, who will measure it, and how it will the data will be gathered.

Other stated objectives include:

“The City will work with its partners, including SacRT, to expand service lines and increase the convenience of public transit by reducing the time it takes to reach a destination via public transit as well as reducing wait times for public transit,” and the “City can work collaboratively with SacRT to develop the infrastructure needed to support public transit including dedicated public transit lanes, signal timing equipment, and more” (TR-2)

Partnership with regional transportation groups, like SacRT, is necessary to integrate transit into the transportation habits of residents. However, **this plan does not define how they will achieve any of these goals**, and there are no significant proposals for strategies that prioritize transit over POVs, such as committing to closing major arteries to all car traffic. Even measures that would provide minor support, such as creating Bus Only lanes, are not part of the commitments in this plan, only something the City will “work collaboratively” and “support.”

These strategies are effective, as evidenced by Market Street in San Francisco. More residents ride transit because it's predictable and faster than driving on available streets. Closing Market Street has the added benefit of making the street safe for residents again and encourages them to walk and bike on the road because the street is safe.



To meet the proposed GHG reduction goals, this plan recommends “Collaborat[ing] with SacRT to achieve an 11% transit mode share by 2030 and maintain this through 2045” (TR-2 B), “Continue to achieve at least 2 million miles taken by shared transportation” and “Continue to achieve at least 2 million miles taken by shared transportation” (TR-2 C).

These metrics do not provide specifics on how the KPIs will be achieved, and KPI C doesn’t even promise an increase of ridership. Without a clear plan on what needs to be done, and how the City will get there, these measures are too nebulous to provide any significant improvement in public transit use.

Even without firm commitments from the City, specific steps to get to the stated goals, and no way to measure the progress made, this plan asserts it will “Collectively reduce passenger VMT to 6,393 miles per person per year in 2030 and 5,625 miles per person per year by 2045 between measure TR-1 and TR-2” (TR-2 D).

To meet these goals, the City will need to overcome several barriers. Transit needs to be frequent, reliable, and a priority when designing streets. This plan offers to “Encourage SacRT to provide frequent, reliable transit in the City’s priority corridors to reduce VMT and support SacRT in implementing priority transit corridors” but it doesn’t commit to making those corridors possible (TR-2.3). Creating transit corridors within the City would reduce the changes needed for TR-2.5, identifying “changes to signals and other technological enhancements for transit prioritization and faster transit travel times.” Other obstacles include residents being unable to get to reliable transit stops safely, such as the light rail. In some parts of the City, it may not be safe or feasible to get to any transit stop, deterring would-be transit riders (TR-2.10, 2.11). City plans, such as the 65<sup>th</sup> Area plan identified the 65<sup>th</sup>/University Light Rail Station as a future major transit hub, and indicated the need for improved AT infrastructure to get there. This plan was introduced in 2009, and the street still does not have sidewalks on several long stretches of the road, and the bike lanes are too close to traffic that often exceeds 55 MPH, making it a dangerous street and a lost opportunity to be a major transit corridor.

Parking minimums and curbside management are other obstacles, and the Plan commits to “Eliminate parking minimums Citywide” and “improve curbside management strategies” which will have a significant impact (TR-2.2). This can be seen in cities such as Santa Barbara, where they’ve created a downtown area where there is extremely limited parking available, and most parking costs are high. The result is that people do not drive into the city, they bike or take transit. This also greatly increases foot traffic to stores, supporting small businesses.

One of the only solutions that the City has committed to and has control over is in TR-2.12, to “identify an Employee Transportation Coordinator and establish an employee commute program for City staff that includes provisions for telecommuting and encourage other public and private agencies located within the City to do the same using requirements and/or incentives.”

This solution will have very little impact on GHG from transportation and does not support any of the actions outlined in TR-2 other than reducing VMT from commuting.

The City must commit to updating roads and infrastructure to prioritize AT and PSM by addressing the obstacles that prevent people from utilizing them:

1. Guaranteeing a fast and reliable transit system. The City must close certain major roads to POVs, institute priority signals for transit and pedestrians, and redesign the city to encourage and support public transportation.
2. Expand the system. There are several areas of Sacramento that do not have service, or the service is inadequate. This forces residents to use POVs to meet their transportation needs
3. Eliminating nearly all parking within downtown. This encourages transit and AT for all trips to the city center
4. Charging parking fees, where possible, across the City for all POVs. By charging a fee for parking, residents who still choose to drive will help generate revenue for the land that is dedicated to holding POVs, helping offset the lack of revenue generation from those spaces.

With these additional steps, City residents can adjust to these new modes of transportation much more efficiently than if only the proposals in the PD are instituted.

**E. The Need for the Recommended Increase in EV Chargers at City Owned Buildings Described in TR 3.2 EV and Future Requirements are Unclear**

Sacramento must increase the availability of EV charging stations as the demand for chargers increases over time. The extent of the future need is unknown but likely to increase, given the state’s ambitious long-term goals and that Congress may pass legislation in 2022 that gives EVs a significant boost. More tax incentives for EVs will increase demand for chargers, particularly in City parking lots open to the public. This demand is balanced however, by many employees telecommuting, and many City services are which are offered on-line. In addition, there is no clear evidence of the rate of usage of such chargers and whether they play a role in motivating people to purchase EV vehicles.

The extent to which future EV adoption rates will impact GHG Emission rates is a point of speculation and dependent on a complex series of developments over which the City has no control or influence. Factors such as EV availability, EV affordability, the level commitment of state and federal resources to EV infrastructure, the economy and technological advances will likely control EV adoption rates. Exactly how this will play out in Sacramento is unknowable.

In addition, the PD suggests current equipment use and design may be obsolete in the future. *“...The need for charging infrastructure may change over time depending on new technologies such as smart chargers and trends in personal EV adoption. We can anticipate that the EV charger technology will rapidly evolve.”* (Appendix C, page 29).

Perhaps a pilot program should be instituted to see the results before making a larger commitment. In addition, these proposals do nothing to address the affordability of EVs, particularly for lower income communities. Without determining how and when EVs can be acquired by a broader segment of the population how can we be sure that the projected reductions will occur.

**VI. While Important, Increasing the Tree Canopy Will Not Result in the Immediate Reductions in GHG We Must Achieve**

Measure CS 1: Achieve 25% urban tree canopy cover by 2030 consistent with the Urban Forestry Master Plan. Achieve 35% urban tree canopy by 2045.

“Implement the Urban Forest Master Plan with a goal to achieve 25% urban canopy cover by 2030 and 35% by 2045. 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” (CS-1.1).

We recognize the necessity for increased tree cover to encourage AT and to moderate urban heat islands. It is also visible in communities and builds on the success of the SMUD program. While this will assist in carbon sequestration in the future, and makes the City more livable, it is not an immediate solution to GHG.

With the challenges of the climate crisis at this moment, our goal for tree canopy must be considerably higher, at 60-70% coverage, and the City must deploy this canopy to lower-income neighborhoods immediately. As temperatures rise and the City develops more AT pathways, tree canopy will be essential in assisting with this transition and improving comfort. The projected benefit provided by increased urban tree canopy is 1.9% of the total 2030 Projected GHG Reductions (Appendix C, page 5). However, given the delay in realizing the savings, this doesn't meet the priority guidelines established, as the gain is not “critical”, nor will the action have the “greatest impact” on GHG reductions. It should be part of the CAAP; however, priority resources targeted for significant GHG emission reduction should be channeled toward goals with more substantial benefits.

#### **VII. The PD Proposals on Waste are Simply Reiterations of State Requirements; More Must be Done**

We are concerned about two sections in the PD that relate to Waste:

- (1) “Continue to provide backyard compost education and reduced-cost compost bins as well as kitchen-top food waste containers to participating residents,” (W-1.3) and
- (2) “Serve as a regional partner in the development and implementation of an edible food recovery program which connects commercial edible food generators with local food banks, to recover at least 20% of the edible food that is currently disposed of for human consumption, consistent with SB 1383” (W-1.6)

Both goals meet the standard set by the state, and do not provide additional steps or goals that would reduce GHG beyond what reductions will happen because these laws were implemented. And they highlight the significant disparity between the privilege and the disadvantaged. **Low-income families are more likely to not have a backyard** to use compost, while wealthier ones do. Lower-income families benefit significantly from the food recovery program, and this metric does not expand on the edible food recovery rate from the state's current mandate.

The City must focus on establishing food security for vulnerable populations, especially children from low-income families, by committing to community gardens and enforcing an edible food recovery rate of 80%-100%. This will assist with GHGs and make a empower food insecure residents.

#### **VIII. More Is Needed Concerning Electrification**

All the metrics presented in electrification rely on SMUDs actions, not the City's. **This will not reduce the City's emissions.**

The CAAP must include information about what the City will do to ensure electrification, and how they will support residents with this transition, especially lower-income households. This includes retrofitting older dwellings with newer, less energy intensive utilities, and subsidizing solar construction for lower-income residents.

#### **IX. The PD does Not Meet Its Stated Equity Goals**

The Sacramento City Council states equity is a major goal. They support policies that assist individuals experiencing homelessness, family poverty, encourage healthy habits, provide better air quality, etc.; unfortunately, this plan does not do enough to address these issues because it does not identify **appropriate and ambitious measure for the City's climate goals**, and this plan does not prioritize AT or several other initiatives that would greatly improve quality of life. It does little to address climate change and homelessness and disaster preparedness.

The PD places the City of Sacramento in a supporting role rather than the leading role it must assume to reach its goals. The outlined goals and KPIs place the responsibility of drastically reducing the City's GHG on residents and private companies **with little incentive** to reach their climate goals.

Nearly every goal stated in the Plan does 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 to act now. But simply prioritizing a few projects in the short term that will not result in the GHG reductions needed. These actions must be part of a comprehensive plan that focuses on public and active transportation. The City must commit the funds to achieve these goals and demonstrate climate leadership for other local governments to follow. Now is the time to move from rhetoric to action.

Sincerely,

/s/


Elizabeth Barrett  
Member, Citizens' Climate Lobby, Sacramento Chapter

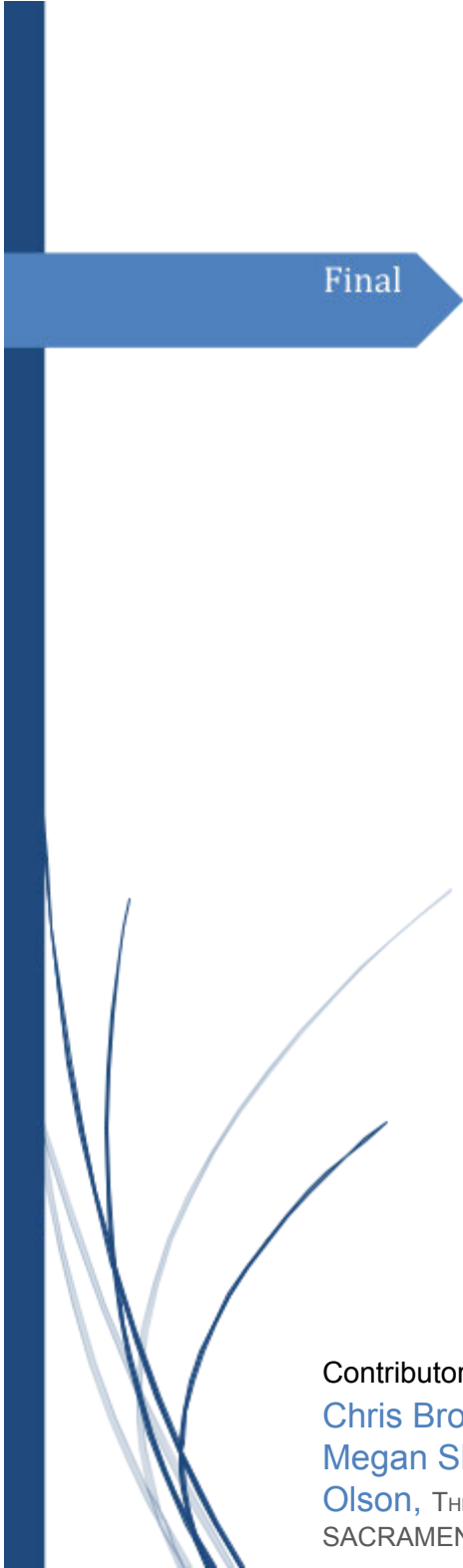
/s/

Kay Crumb  
Member, Citizens' Climate Lobby, Sacramento Chapter

/s/

Edith Thacher  
Lead, Citizens' Climate Lobby, Sacramento Chapter

<b>Full Name</b>	<b>First Name:</b> Chris <b>Last Name:</b> Brown
<b>Email</b>	
<b>Message</b>	<p>We acknowledge that the Draft Preliminary CAP has descriptions of the climate emergency we face and some of the dire consequences, although not all of the potential disasters in the section on Consequences of Climate Change in Sacramento are detailed. The historical data cited in the report only runs to 2005. This is inadequate, considering that the last five years have seen record after record broken in terms of the extent and damage by wildfires in the state as well as the number and scale of extreme heat events. The strange omission of recent years in Figure 1.5, "Wildfire in the 20th and 21st Centuries in California", suggests that a more recent map would show more extensive damage than that modeled for future years in that same graph. The historical data cited in the report and included in the analysis should be brought up to at least 2020. We also appreciate and support the list of measures in the Community Action Guide that detail some of the potential responses that members of the community can take, but again they fail to meet the severity and scale of the problem which faces us. The Draft Plan makes no mention of the City's Climate Emergency Declaration of December 10, 2019. Instead it is clear from the section on page 7 that the approach of this Plan is to do the minimum necessary to meet a state guideline from CARB. The discrepancy between the crisis described in the Consequences section and this minimalist approach is glaring. This Draft Preliminary Climate Action Plan document can and should be strengthened before its next draft. There are a number of topics which are mentioned in the CAP, but we believe more specific language would strengthen it in important measurable and monitorable ways. We have attached a more detailed document with measures which would help the City rise to meet the climate challenges we face. Chris Brown Sacramento Climate Coalition Coordinator</p>
<b>Upload File(s)</b>	Master Comments 2022 for County and City of Sacramento CAP.pdf



# Climate Change Information

Input for Planning Purposes for the  
City and County of Sacramento

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Mar 18, 2022

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# Executive Summary

**Climate Change Information, Input for Planning Purposes for Sacramento City and County of Sacramento** was prepared by the Sacramento Climate Coalition to describe, highlight, and outline the many climate change actions, challenges, and opportunities that Sacramento County needs to confront, manage, and implement over the next eight years to bring down net greenhouse gas (GHG) emissions to zero in our region.

We are in a **climate emergency** and our actions must reflect this. This means that we will most definitely be working outside our comfort zone. Our climate crisis is a current existential threat to our survival. **Doing nothing is not an option.** Doing more of the same is not an option. The time is now for forward thinking, allowing for organic natural solutions that already exist to reverse the devastation we have created and put us back on the path to sustainable life. As weather patterns are shifting, we are experiencing more and more extreme weather events. Soon, as sea levels are rising, water will become more scarce resulting in our food supply also being threatened.

This report addresses direct actions that must be taken or expanded to lower GHG emissions (e.g., electrification) and combat extreme conditions mentioned above; the report also addresses the greater financial, human, and species extinction costs of not accelerating our planning and implementation to address climate change. These direct and essential actions we must rapidly implement range from using existing technology to developing strong carbon sequestration actions that will address the areas where technology currently does not exist.

**Transportation** is the largest GHG sector in Sacramento County. This paper addresses key transportation actions and strategies. Sacramento County's 2021 Draft Climate Action Plan covers many of the issues discussed. Both the City and County need to address these and other recommendations *by 2030*. This paper recommends a focus of getting people out of their vehicles and onto public transportation, biking, walking, and rolling while supporting electric vehicles. These actions are critical to lowering local GHG emissions.

Decarbonization through **electrification** is many things. Primarily one thinks of electrifying buildings using green energy and not being powered with fossil fuels like natural gas heating, wood-burning stoves, or gas hot water heater and cookstoves. It is also building efficiency in order to consume less energy. Homes, office buildings, and other businesses that rely on power for equipment all need to be electrified and made more efficient on an accelerated schedule. The longer we wait to electrify, the more it will cost to retrofit existing infrastructure with green power alternatives and the longer it will take to reach net-zero GHG emissions in our region. Fossil fuels have little to no purpose in our future if we are to keep our carbon emissions down to the point that the planet can heal itself from the impacts from humans. Both the City and



County of Sacramento must set a powerful example both within their own infrastructure and through ordinances to establish accelerated schedules to convert our entire region to green energy.

Climate change challenges affect our region's **resiliency**. We are experiencing extreme heat, extreme rain events, extreme wildfires, and unhealthy air pollution levels that have a huge effect on our most vulnerable communities in our region that lead to public health issues that must be addressed immediately. To remain sustainable, the City and County have an opportunity to not just manage rapid climate change dilemmas but to be proactive by developing resilience actions and regenerative practices.

**Environmental Justice** Lower income, more vulnerable neighborhoods, frequently communities of color, suffer from underinvestment and a lack of support for necessary improvements. Supporting our underserved communities helps our whole region address inequities as well as helps to prepare these neighborhoods for climate change challenges and events.

**Resilience hub** development provides an opportunity to address current everyday issues in our communities, (especially our lower income communities) such as food insecurity, as well as access to health care, and can provide a way to prepare for climate change effects and climate disasters. The same resiliency measures must be applied to our power system in order to reduce power outages especially during floods, extreme wind events, and vandalism. The use of solar power and other green energy options offer tools to help improve our resiliency in our communities. Resilience hubs combined with green energy options must be a priority. Resilience and food hubs, better, affordable transportation for low-income areas, and more investment in affordable housing, are all solutions that can address the food scarcity issue and our vulnerability due to the climate events we are facing.

Addressing the needs from climate change weather events that cause people to be left unsheltered must also be addressed at all government levels locally and abroad. Close to home, the Paradise fire highlighted **disaster resilience** problems for surrounding communities while Paradise residents face health, trauma, and safety impacts from the fire's impact to their homes and livelihood. Sacramento City and County must prepare plans and take actions to protect our citizens from extreme climate change events. **Disaster resilience** means supporting local networks that address the social problems the unsheltered suffer from, that then, in turn, incur major costs to local governments: mental and medical illness, substance abuse, lack of basic services (restrooms/showers), and hunger, in addition to the healthcare and law enforcement costs. In the long term, the government will save money with a disaster resilience planning and implementation program. Acting now is essential!

Local governments should quickly implement programs to educate the public on **composting, reducing food waste, developing more residential and community gardens, teaching**

**healthy cooking, and promoting tool lending services.** These programs all support food hub development and will help provide healthy fruits and vegetables for people that often rely on processed and less healthy food options. These actions also reduce methane gas releases from landfills and allow for gardens that will sequester carbon from the atmosphere. This relatively low investment of resources will produce large GHG reduction benefits and will involve the community in implementing these actions to protect our planet.

Finally, local government agencies, including Sacramento City and County, the Sacramento Municipal Utility District and Sac Regional Transit, must educate the public on the need to reduce GHGs and how the public must contribute to the solutions needed to get to net zero GHG by 2030. This **public component needs to be made a very high priority**. Educating the public on benefits they (and our region) will receive from home electrification, and actions they can take, including using public transportation to commute to work instead of driving a fossil-fuel powered vehicle, taking resilience actions, and considering rooftop solar energy, will make them better informed on decisions we all need to make in the next few years. The promotion of green jobs must also be a part of this discussion.

[Local government collaboration](#) on GHG issues will not only provide a clear, single, and united voice to the public, but it will also improve local government's efficiency, reduce government costs, and open the door to gaining public support for needed actions that will make Sacramento County among the national leaders in getting net GHGs to zero by 2030.

# Transportation

Transportation is the largest GHG sector in Sacramento County. This paper outlines five key transportation actions and strategies. Sacramento County's 2021 Draft Climate Action Plan covers many of the issues discussed. Both the City and County need to address these and **other recommendations by 2030**. This paper recommends a focus of getting people out of vehicles and onto public transportation, biking, walking, and rolling while supporting electric vehicles. These actions are critical to lowering local GHG emissions.

We recommend that the City and County::

1. Improve public transportation and **get people out of vehicles** as they commute to work, run errands, worship, and shop for groceries and clothing. While there are many other reasons to drive a car, local government should focus first on the most frequent uses of vehicles that represent the majority of vehicle miles traveled (VMT). Adopt and implement policies in transportation and land use decisions that consider ways to **reduce VMTs** when new projects and modifications to existing projects are evaluated.
2. Explore and develop best practices for **charging stations** and other supporting infrastructure (e.g., running power to electric panels) necessary to support Electric Vehicles. (EVs). Focus on locating places where people can fully charge EVs especially for households that rent or lease their primary residence. Other EV recommendations are below.
3. Fund projects that **promote walking, biking, and rolling** that include the following elements: separated bikeways, secure bicycle parking, adequate lighting, cooler bus stops during hot summer months, wider sidewalks, traffic calming, safety rules for new modes of transportation (e.g., electric bikes), and other speed reduction measures.
4. **Ban Permits for "Gas" only stations**. Permit only multiple sources fueling stations with the space for parking spots while charging.
5. All transportation projects must consider **environmental justice and equity** in all phases of work prioritization and funding from project planning to project completion to assuring proper maintenance and operations.

The largest sector of Greenhouse Gas Emissions in Sacramento County is transportation. On-road and off-road vehicles account for 1,671,598 and 196,769 Metric Tons, respectively, of CO<sub>2</sub> per year (MTCO<sub>2</sub>/year) or 38.5% of the total GHG community emissions (4,853,647 MTCO<sub>2</sub>/year measured in 2015). Government Operations vehicle fleets make up 29,951 of the 123,397 MTCO<sub>2</sub>/year or 24% of the total Government Operations GHG emissions. "[1] Sacramento County CAP, September 2021, Table 1)

The community, businesses, and government agencies need to collectively focus on reducing GHG emission in our region and treat it as a top priority. Addressed here are three key recommendations for both households and business (including state, federal and local agencies):

## Improving Public Transportation

The County's September 2021 CAP does a n excellent job in addressing needed actions in our region, and we ask that the City also adopt this CAP. Both the County and City need to address these actions by 2030, because time is of the essence!

Sacramento residents, especially in suburbs, drive their cars to accomplish nearly all of their tasks during a week. This is often considered necessary due to dropping off and picking up children from school, inflexible work schedules that force driving to work, work shifts that do not correspond to transit route times, long commutes outside of the Sacramento region, and other valid reasons to "need" to drive. City residents have numerous bus and Light Rail routes to choose from, and biking is comparatively easy to get to downtown offices due to shorter distances and more bike trails. Walking is also an option for people living in the downtown area. As a result, the real focus is to bring people downtown that live more than 5 to 10 miles from work.

While CAP actions are included in this document (noted by \*\*), the Sacramento Climate Coalition has also included other actions and recommendations along with proposed time frames to complete these actions. Timeframes are noted at the end of each suggestion. Year 1 begins January 1, 2022. Year 8 ends on December 31, 2029.

## Improved Transportation Access to Neighborhoods via Sac RT and other services

- a. Provide bBetter access to schools, libraries, shopping centers, parks, places of worship, bus stops and Light Rail stations. (Years 1-3)
- b. Provide better ADA access to busses and light rail and paratransit (Years 1-3)\*\*
- c. Ensure safe access to light rail stations, bus stops, schools, parks, activity centers, and shopping malls (Years 1-3)\*\*
- d. Find safe ways for children to ride their bikes to school including better street security programs. (Years 4-6)
- e. Have security cameras at bike racks and isolated bus stops. (years 6-8)
- f. Prioritize work to address EJ issues in all planning, especially in selecting project locations. Although, this should happen naturally. (years 1-3)

## Cars, Trucks, Planes, and Equipment

- a. Reduce cars per household by one. While challenges exist for families working outside the home, taking children to school, running errands, etc., families could run a one-month trial to see if they are able to “take care of business” by only using one less vehicle. (Years 1-4)
- b. Expand EV charging stations. This is not only good for our air quality, but it will also be good for restaurants and shopping centers as people moving through Sacramento will stop, charge their vehicle, shop, and eat. People will not buy EVs if they fear they will not be able to recharge their cars. The same applies to non GHG emitting fuels. See issues regarding cobalt at the end of this paper. (Years 1-3)\*\*
- c. Provide more hydrogen, biofuel, and other non-carbon fueling stations if the technology and cost competitiveness of these fuel types develop. These fuels will be able to support cars, trucks and equipment. (Years 1-4)
- e. Reduce car idle time, especially on our freeways without the need to widen highways. This can be accomplished by increasing the use of public transportation, carpooling and biking. (Years 1-6)\*\*
- f. Study expanding school bus services in all areas with a goal of reducing lines of cars dropping off and picking up their children at school. This should lead to use of electric buses if this is a feasible alternative. (Years 6-8)
- g. Get churches, synagogues, mosques and other places of service to set up carpooling to and from services. Not only will this improve air quality, it will likely also bring together the community and improve attendance at services. (Years 3-6)
- h. Reducing fuel GHGs in Sacramento will be difficult without help from State and Federal air quality ordinances and laws.\*\* Sacramento is a hub to get to South Lake Tahoe, Tthe Bay Area, Reno, and moving north or south through California. Unless everyone moves forward with cleaner fuels, our efforts will be diminished by the fumes from high gas usage vehicles passing through Sacramento. California and our federal government need to advance development of clean fuels for large trucks.  
**The City and County need to lobby our legislature to influence bill development and passage.** Per the EPA’s website, “On August 5, 2021, EPA announced plans to reduce greenhouse gas (GHG) emissions and other harmful air pollutants from heavy-duty trucks through a series of rulemakings over the next three years. The first rulemaking, to be finalized in 2022, will apply to heavy-duty vehicles starting in model year 2027.”(Years 1-5)
- i. Airplanes need to look for cleaner fuels, also, and federal and private industry R&D needs to accelerate. Carbon taxes on flights should become a part of everyone’s ticket price and the tax will be used to both develop better aviation fuels and provide transportation subsidies for low-income residents of Sacramento County, including but not limited to improving access to public transportation. (Years 5-8)

## Walk, Bike, and Roll and Transportation Improvements

- a. Create more safe walking, scooter, and bike routes. (Years 1-4)\*\*
- b. Require more bike racks for parking bikes for all businesses and Light Rail stations. (Years 1-3)\*\*
- g. Provide for bikes to rent for a few hours to a day, and place bikes at Light Rail Stations. (Years 5-8)\*\*
- h. Use light green paint to delineate bike lanes in busy areas in both the city and county for uniformity and bike safety. (Years 1-8)
- i. Improved usage and safety classes for persons using electric bikes, skateboards, and Segway scooters that can reach speeds of over 30 mph. Many riders go way too fast! (Years 1-3)
- j. Improve street lighting in disadvantaged areas and especially at busy intersections.\*\* Survey dangerous crosswalks for better pedestrian lighting using crash data. Provide adequate lighting at all bus stops that operate in the evening. (Years 1-3)
- k. Add lighting, drinking fountains, public restrooms, benches, and other amenities across the county to encourage walking and cycling. (Years 3-6)\*\*
- l. Beautify and expand existing carpool parking sites and offer incentives for employees to carpool to work. Add benches and trees. (Years 3-6)\*\*
- m. When possible, develop safer bike lanes and sidewalks that are separated from the streets. (Years 1-8)\*\*

## Other Considerations

### Maintenance

Maintenance for the infrastructure needs to be considered in the planning, design, construction, and operation of our transit system. Scheduling regular maintenance may appear expensive but will actually save money in the long run.

### Volunteer Support

Voluntary bike trail clean-up operations and operations similar to “adopt a bike trail” operations for transit systems can help keep the system clean. Community clean-up events will attract riders who support keeping our transportation system running strong. Service credits for high school students should also be considered.

### Low Income/Homeless Services\*\*

Sacramento needs to develop plans that allow low income and unhoused people to utilize public transportation to help them improve their quality of life. Our community needs to consider the use of special vehicles that can take homeless persons to appointments with the DMV (for IDs),

mental and medical health services, AA and NA meetings, and other places that can help homeless people get out of the cycle of living on the street. These types of services need to be extended to large encampments and areas identified by the Sacramento County Sheriff's Homeless Outreach Team (HOT) and the City Police Department.

## Electric Vehicles

### **We recommend that the City and County:**

1. Explore and develop infrastructure for Electric Vehicle options as a primary and secondary vehicle.
2. Large apartment complexes need rapid charging stations. Lower level charging stations are more appropriate to smaller apartment or condo complexes with garages or assigned parking. Federal funding should be secured for environmental Justice communities and low income housing to install charging stations while the permitting process should require charging stations as appropriate.
3. Secure funding for start up grants for local EV conversion businesses, an EJ issue/ Middle and low income people usually buy used cars.
4. Rapid charging stations for long distance travelers. Placement at area Hospitals, as well as shopping and large event venues.
5. Stop issuing permits for gas stations (only providing fossil fuels). Start issuing permits for fueling stations that provide multiple fuels - fossil fuels as well as rapid electric charging or hydrogen.

According to the California Air Resources Board, "The transportation sector, including all passenger cars and light trucks, heavy-duty trucks, off-road vehicles, and the fuels needed to power them, is responsible for more than half of California's greenhouse gas emissions. It is also responsible for the majority of smog-causing pollutants and is a significant source of toxic air contaminants that directly impact community health. These emissions pose a direct threat to the environment, the economy, and public health.

By setting a course to end sales of internal combustion passenger vehicles by 2035, the Governor's Executive Order establishes a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045. It is important to note that the Executive Order focuses on new vehicle sales for automakers, and therefore does not require Californians to give up the existing cars and trucks they already own."

The government needs to lead by example: and we advocate for the County and City of Sacramento to electrify their fleets by 2030 as laid out in the Climate Emergency Declaration. For example, the County is working with SMUD to install fast (DC) chargers and a level 2 charger in Citrus Heights. The County needs to do more of this type of collaboration.

According to a Google search, well over 17 million new cars are purchased every year in California. Over the coming years, the marketing of electric vehicles in California will increase

and with rising gas prices and the governor's resolution, there will be an increase in EVs on California roads. Most of California's major highways intersect through Sacramento. The County can help meet the carbon emission goals by preparing the infrastructure to support emissions-free vehicles. Having opportunities for rapid charging in Sacramento could bring business to Sacramento County.\*\*

The most beneficial use of federal funds would be to support businesses that convert combustion engines to electric vehicles by providing start-up grants. This would address middle income, working class and low-income people who buy used cars. If they like their car, they might consider converting their vehicle to electric or buying a used vehicle that has been converted to electric. This would be preferable to buying a used car with a combustion engine there by lengthening the life of a polluting car. This would greatly accelerate the number of clean energy vehicles on Sacramento's roads, further reducing greenhouse gas levels and making economic commitments to low- income Sacramento communities, who are often the ones hurt the most by our poor air quality.

Environmental justice can also be addressed by providing grants to low-income homeowners to install home charging stations, grants for electricians to provide free or low cost installations of charging stations for people of low income, and giving the owners of apartments, especially low-income apartments, incentives to install charging stations, in order to provide for a rapid and just transition to clean energy vehicles.



# Decarbonization through Electrification & Efficiency

## **We recommend that the City and County::**

- Adopt an electrification ordinance for all construction going forward. There should be only very rare exceptions when a business can not accomplish their task any other way. New construction will be required to have energy efficiency with insulation and energy efficient windows and doors.
- Upgrade all permit regulations to accommodate the increasing needs for twenty first century homes and buildings that have all electric appliances and may have solar plus batteries that need space in electric panels.
- Adopt an electrification ordinance for a home or business and its appliances when remodeling requires a permit.
- Create an education program for developers and customers on electrification and building efficiency.
- Set up interconnected microgrids in Sacramento County through collaboration with Sacramento City, County, and SMUD in order to increase our grid's efficiency and resiliency. Our utility's efficiency improves when energy is not wasted and can be redirected where it is needed adding to the community's resilience. Sacramento will be better able to deal with climate change and to prevent disasters, such as loss of power during killer heat waves.

The State of California and Sacramento County have evaluated their carbon emissions and at least 1/3 of emissions are from the built environment. SMUD encourages their customers to choose electrification of their homes. The population of the County is expected to grow, as it is in the rest of the world, and the demand for energy will grow almost to the limits of our ability to provide energy. The solution is decarbonization through electrification and efficiency. All three are essential, efficiency uses less energy and electrification prepares for the use of clean energy provided by rooftop solar, batteries or utility provided clean energy sources.

Decarbonization is many things. Primarily one thinks of a building not emitting carbon by not burning fossil fuels like natural gas heating ,wood burning stoves, or gas hot water heater and cook stoves, but it is also building efficiency in order to need less energy for heating of the air and water, and cooling.

Decarbonization happens when we:

- create efficiency in our buildings energy use;
- install energy efficient appliances like LED light bulbs, convection stoves and other energy efficient home appliances, heat pump water heaters and furnaces;

- insulate our building and utilize passive solar warming and ventilation/ fans for cooling; and
- when our utilities become more efficient through development of microgrids<sup>1</sup>

Electrification of homes and businesses is the path to utilizing green energy, whether that be Rooftop Solar Plus batteries or clean energy provided by a utility. Fossil fuels should have little purpose in our future if we are to keep our carbon emissions down to the point that the planet can heal itself from the impacts of overconsumption and exploitation of the natural world. Appliance efficiency uses less energy to accomplish its task. New buildings should be taking advantage of advances in home and building efficiency with walls and ceiling insulation, high E glass, and buildings oriented to gain solar rays by the angle of the winter sun and shaded from the angle of the summer sun.

For the already built infrastructure, a significant part of decarbonization is the electrification of buildings and efficient electric appliances in order to stop burning fossil fuels and be ready for clean energy sources. This energy could be rooftop solar or clean energy from a utility. If a building is electrified, its natural gas connection can be shut down.

There needs to be continued education, permit regulation, and commitment for funding assistance for homeowners and building owners if the built infrastructure is to be decarbonized. People are resistant to change and fearful of an increased electric bill. The consumer may not make the right choice without education on the cost savings and health benefits of electrification. In addition, many residents do not have the financial resources to make that change, and so programs to assist with no-cost financing and direct installation will be needed.

The longer the County and City wait to electrify building codes, the more it will cost to retrofit buildings or housing units with methane/natural gas, or propane hookups. Building more gas infrastructure compounds the problem. Sacramento City's ordinance is not reducing gas units in buildings over three stories; many more units with gas infrastructure are still going to be built, thereby continuing to add to the buildings needing decarbonization. There is no reason to allow this other than pressure from developers who are not educated or do not yet accept the benefits of electrification. There are no logistical problems in building all-electric. If you want high-end appliances, they are available including electric grills, and pizza ovens. The New Building Institute has multiple examples here in California of successful zero carbon buildings that include schools, warehouses, and multi-building business parks.<sup>2</sup> We need to be building energy-efficient and clean energy utilization buildings and homes, if we are to reduce our energy use per building and have the reserves we need for growth as the population expands. We do not need to expand Sacramento's carbon footprint.

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<sup>1</sup> *[More Than a Fair-Weather Energy Source: Solar + Microgrids Offer Resilience.](#)*

<sup>2</sup> <https://newbuildings.org/news/new-building-electrification-technology-roadmap-shows-pathways-to-achieve-zero-carbon/>

As stated below in the [Costs section](#), the costs of inaction are higher than the costs of rapid action. Sacramento County's budget process may not allow direct purchase of all electric equipment for every building in the County, but the County does have tools at its disposal to direct a rapid retrofit of existing buildings, as well as prohibiting any new gas hookups. Ordinances can be passed that require electrification upgrades on all remodeling permits above a set square footage to be determined. Also, landlords can be required, when replacing appliances, to install electric appliances. This will help address equity issues. All-electric homes are safer and healthier. "Transitioning buildings from natural gas to clean electricity, such as through heating and cooling systems, water heaters, and cooking equipment, will be key to reaching California's emissions reductions goals. The City of Berkeley has taken a lead on this issue by banning natural gas hookups in new low-rise construction. Recently the ban survived a challenge in federal court, although opponents are planning to appeal the decision." - Berkeley Law Center for Law, Energy, and the Environment.

Communities of color and the poor are more likely to have health issues related to gas extraction/production and vehicle emissions, as well as gas appliances in their apartments and homes. (See CalEnviroScreen) Any opportunity to reduce carbon will lead to better air quality and lessen the environmental impacts of climate change that impact the homeless, the poor, and communities of color first. That said, the City and County need to do what can be done to ensure equity and environmental justice for all in Sacramento.

Here are some recommendations from the New Building Institute:

- For [decarbonized residential construction](#)
- For [decarbonized commercial construction](#),

Information on the development of micro grids that would increase community resilience: [Microgrid Business Models Analyzed in UC San Diego Study](#)

## Solar Power and Resilience

We recommend that the City and County::

1. Invest in and include household solar power with battery backup as part of the infrastructure to address climate change and an emergency preparedness plan.
2. Adopt ordinance to incentivize rooftop solar and provide for renters, as well as owners to benefit from the lower bills.

"A resilient power system, according to the US Dept of Energy and the National Academy of Sciences, "must be capable of lessening the likelihood of long duration electrical outages occurring over large service areas, limiting the scope and impact of outages when they do occur

and rapidly restoring power after an outage.”<sup>3</sup> The US Department of Energy’s website offers two scenarios of the advantages of integrated solar power as part of that resilient power infrastructure. A flood forces a local utility substation to shut down, “within seconds, residential photovoltaic panel systems with battery storage automatically detect the loss of grid power and switch to ‘islanded’ mode to keep the power on.” “Solar battery backup at a local fire station enables the utility company to keep its communication equipment on so it can coordinate rescue operations.”

“Solar energy systems have the potential to make homes, commercial buildings and entire communities resilient. By adding the critical infrastructure in a community (hospitals, fire stations, shelters) and equipping those buildings with solar and energy storage systems, the community can respond better to, and recover faster from, electrical services loss.” (energy.gov) Solar with battery backup can be used to avoid the increase in pollution during blackouts, caused by conventional back up generators. Businesses and homes with solar systems which still rely on the power grid can “also make (the grid) more resilient by reducing the amount of energy that homes pull from utilities and make transmission lines less likely to spark.”<sup>4</sup>

The potential for solar to contribute to the resilience capacity and provide the health benefits of lowering GHS for vulnerable populations is significant. Policymakers should consider households’ existing solar or lack thereof, when formulating strategies and plans for disaster preparedness, including early warning systems, communication during recovery and provision of health care and ensuring safety especially for these more vulnerable neighborhoods.<sup>5</sup>

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<sup>3</sup> Energy.gov, ” Solar and Resilience Basics”

<sup>4</sup> CBS news.com

<sup>5</sup> ODI.org/media/docs 11955 pdf (Overseas Development Institute) “How Solar Households Contribute to Resilience”

# Environmental Justice

## **We recommend that the City and County:**

1. Invest in their lower income, more vulnerable economically neglected communities via affordable housing, electric and solar infrastructure, as well as resilience and food hubs.
2. Invest in affordable housing as it will assist in solving food insecurity.
3. Assist in helping families access current food programs like CalFresh, and implement a mobile application to connect food providers with the food insecure.
4. Raise the minimum wage.
5. Address air quality issues and disaster preparedness by investing in solar power in our more vulnerable communities.

Lower income, more vulnerable neighborhoods, frequently communities of color, suffer from underinvestment and a lack of support for necessary improvements. Supporting our underserved communities helps our whole region address inequities as well as helps to prepare these neighborhoods for climate change challenges and events.

The lack of affordable housing in Sacramento is an enormous resilience issue. If residents are spending 40-50 to 60% of their income on housing, food insecurity often follows. The Covid pandemic has only exacerbated these social problems.

Providing low-income housing with electric and solar infrastructure, as well as resilience and food hubs, can lower the financial hardships that occur every day, as well as during community disruptions.

One in eight Sacramento residents struggles with food insecurity according to a study done by Feed America in 2019. “Under-resourced and low-income neighborhoods like North Highlands, South Sacramento, West Arden Arcade and North Vineyard have significantly higher rates of food insecurity compared to the rest of the County.” (See Sacramento Bee 3-part article by Alexandra Yoon-Hendricks and Benjy Egel, 7/22/21, “The Face of Hunger”) Again, food insecurity is tied to the high cost of housing. Food banks are seeing families who are housed, and even have two incomes coming up short on their food budget. Many residents make too much money to receive federal food assistance, yet need the help of food banks to get by. In addition, many residents who qualify for assistance are not signed up. “Before Covid, the local food bank was feeding 150,000 people per month. Now they serve 300,000 people monthly (Sacramento Bee article). These struggles are tied to a lack of economic opportunity, especially when the current minimum wage does not allow people to live reasonably. Catherine Brinkley, a UC Davis food systems professor points to the lack of infrastructure in these same neighborhoods: “We are talking about land-use planning that has historically done things like redlining, cordoning people off because of their skin color, and

starving them of transit, and libraries, and museums, and parks and recreational facilities.” (Sac Bee Food Scarcity article-Yoon-Henricks and Egel.)

Economic investment in our low income, under-sourced neighborhoods is key to solving food scarcity, along with poverty in the long run. Our current food insecurity problems necessitate action in these neighborhoods now. Food hubs can be established in specific neighborhoods with neighborhood partners. Recent reporting by CapRadio (10/8/21 -Janelle Salanga) revealed that “food insecurity in Sacramento is higher than the US average”. Ms. Salaga goes on to say that problems with available translators and transportation issues complicate access to food sources. Many residents do not have cars and must meet the two-hour windows and particular days that offer food distribution using an inadequate bus system. Having a food hub in their neighborhood would facilitate access for residents.

We recommend local governments develop a mobile software application in 2022 that connects restaurants, caterers and food banks, and community food hubs and food insecure residents. This kind of program can help distribute viable leftover food now from restaurants, caterers and food banks to localized food hubs where it can be distributed to the residents in that neighborhood that need assistance.

The first food hubs should also be housed within resilience hubs and provide neighborhood locations for continued food distribution and address food waste and composting, along with promotion and education about practical climate actions, healthy cooking, and tool lending services. These services offer residents the opportunity to become partners in addressing climate change through learning to recycle their food waste, grow their own food, and adding plants and trees to their landscape.

The City/County should promote Cal Fresh as it is undersubscribed. Nourish California estimates that if every Sacramento household that currently qualifies actually signs up, it would inject another \$90.5 million into the local economy and benefit food retailers and farmer’s markets.

Raising the minimum wage supports resilience as well. Residents need to be able to live on their income and not be forced to work two to three jobs to afford feeding their families. Our City and County should support raising the minimum wage which is vital for residents to live reasonably.

## Public Health Issues

Communities of color and the poor are more likely to have health issues related to gas extraction/production, vehicle emissions, and gas appliances in their apartments and homes. This is in addition to a lack of tree canopy and greenery. Any opportunity to reduce carbon will

lead to better air quality and lessen the environmental impacts of climate change that impact the homeless, the poor, and communities of color first. Reducing carbon can be accomplished through actions such as electric infrastructure and retrofitting, solar infrastructure, providing more tree cover, and establishing community gardens. See Sections: [Solar Power & Resilience](#), [Community Resilience](#) and [Composting, Community Gardens and a Greener Community](#).

The potential for solar to contribute to the resilience capacity and provide the health benefits of lowering GHS for vulnerable populations is significant. Policymakers should consider households' existing solar or lack thereof, when formulating strategies and plans for disaster preparedness, including early warning systems, communication during recovery and provision of health care and ensuring safety especially for these more vulnerable neighborhoods.<sup>6</sup>

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<sup>6</sup> ODI.org/media/docs 11955 pdf (Overseas Development Institute) "How Solar Households Contribute to Resilience"

## Investment in Resilience for our Most Impacted Communities

### **We recommend that the City and County:**

1. Investment by the City and County of Sacramento in their poorer neighborhoods will automatically address climate issues as well as the historical economic neglect of these areas.
2. Supporting our underserved communities helps our whole region address inequities as well as helps to prepare these neighborhoods for climate change challenges and events.

Underinvestment in communities of color, and a lack of support for change, are major problems that are not being sufficiently addressed in our community. Investment is too often focused on the downtown area, around the Arena and is often driven by the local developers. The languishing neighborhoods that are suffering the most are left behind. Investment in our vulnerable communities benefits all County residents.

In developing proposals for the use of American Rescue Plan (ARP) funds, building of more affordable housing is a key start. Sacramento County should also include community resilience hubs and food hubs or a combination thereof, as a smart investment given our current climate crisis. These hubs, along with affordable housing, and better public transportation to outlying, more impacted areas, are a way for our local government to lower greenhouse gas production while supporting our underserved communities, and assisting with the food scarcity problem. Through these community hubs, the County can also increase community resilience by offering job training and job opportunities for local residents to help run the hubs. According to the National Building Sciences “one dollar spent on resilience for local governments and communities has a four-to-six-fold return on investment.”<sup>7</sup>

With the implementation of a strong resilience plan, that is based in an equitable framework, Sacramento can be more prepared for what is to come with climate change and address current deficits in our poorer communities at the same time. Enforcement of SB-379 (requiring cities and counties to integrate climate adaptation and resilience strategies in the safety elements of the City’s General Plan before or by January 2022) will help promote programs that foster resilience. Resilience and food hubs, better, affordable transportation for low-income areas, and more investment in affordable housing, are all solutions that can address the food scarcity issue and our vulnerability due to the climate events we are facing.

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<sup>7</sup> USDN



# The Unhoused and Climate Change

## **We recommend the City and County:**

1. Invite the unhoused community stakeholders to a climate resiliency and disaster planning session to prepare for extreme weather events and coordinate services to improve results and manage resources effectively.
2. Establish a communication system using social media to connect government and nonprofit service providers to the unhoused and vulnerable communities to supply information about upcoming weather events and available services.
3. Create or expand resiliency hubs that may include safe campgrounds and permanent shelters in under-served communities. Community churches, nonprofits, and citizens actively engaged in the process could work in concert with government officials to conduct a needs assessment, establish policies and procedures and a governance process.
4. Establish or strengthen a carbon-free transportation system that ensures the unhoused and underserved community members can get to a resiliency hub or other appropriate location in emergencies to address basic needs such as housing, shopping, and medical services.
5. Build long-term climate resilient and carbon zero housing with green services, i.e. transportation, medical, food assistance, and job training.

## **The Problem**

Climate change and poverty are driving thousands north to the US border with hopes of a better life and it is reported that millions more will be coming. However, there are already US climate refugees. Thousands displaced in Paradise, California's deadliest fire, have not returned to their communities. Affordability, trauma, water safety, and insurance availability are some of the factors that impact refugees' decisions about where to locate.<sup>8</sup>

Currently unsheltered Sacramentans and other vulnerable populations, such as seniors, people with disabilities, the poor, and people of color are more likely to experience harmful health impacts or even die in extreme weather events. According to Faye Wilson Kennedy of the Poor People's Campaign in Sacramento, six homeless Sacramentans died of exposure in 2020.

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<sup>8</sup> The Guardian, September 9, 2020, Trauma, fear, homelessness: life after California's deadliest fire shows the future climate crisis, Dani Anguiano

The New Yorker reported that 96 people died this summer of heat-related causes during an extreme three-day event in Portland, Oregon--a location with nearly an identical metropolitan area population as Sacramento. Portland's city health officer warned at the start of the extreme heat event that people could literally bake in homes or shelters that were not air-conditioned.<sup>9</sup>

The Paradise disaster also impacted nearby communities. The Guardian reported that Chico grew by 10,000 people--this was 15-20 years of population growth overnight according to the city manager. At the same time, Chico was unable to increase some services, such as fire and policing. Cities at lower risk from sea level rise or wildfires should prepare for the possibility of large groups of people seeking refuge.

### **What are some possible ideas to address these problems?**

If people were left homeless due to a flood we would get them housing, but the unhoused are not treated similarly. We must move to a holistic approach rather than taking incremental measures that address only the most extreme elements of the problem.<sup>10</sup>

Humanity and dignity must be the common denominator in all decisions impacting the unhoused whether the focus is on climate or general plans.

The County's new Climate Mobilization Task Force and any comparable city group should have a seat representing the unhoused population. At a minimum, a proactive approach will allow more flexibility, more consensus-building among stakeholders, and a more cost-effective solution than is possible with a reactive approach.

A systems approach is also necessary to ensure control and coordination. Stephen Roberts of the Homeless Assistance Resource Team (HART) of Orangevale/Fair Oaks talks about the lack of service coordination partly due to how spread-out service providers are in Sacramento County. Also, the unhoused move frequently, often because they are not welcome in any one place for long. He emphasizes the importance of coordination and flexibility to effectively provide the many types of necessary services.

It is not unusual for an unsheltered person to resist spending the night in a communal setting due to fears about loss of belongings, disease or harassment. Or, conversely, feeling like they are bound by too many rules. In a CapRadio article about being on the street through the historic storms in Sacramento this October, a couple said they want a home, not a temporary living situation, and they both have incomes. However, they cannot afford the homes that are available.<sup>11</sup>

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<sup>9</sup> The New Yorker, October 18, 2021, Seventy-Two Hours Under the Heat Dome, James Ross Gardener

<sup>10</sup> The Big Issue, November 1, 2021, Director of Policy and External Affairs at Crisis in "Climate change means ending homelessness is even more important. Here's why," Liam Geraghty

<sup>11</sup> CapRadio, October 26, 2021, Homeless Sacramentans explain how they survived the weekend's historic storm, Kris Hooks, Janelle Salanga

The same CapRadio article discussed city and county services provided in anticipation of the October storm and why they fell short. Four overnight respite centers were announced but only 48 hours before the storm hit. The city hall shelter was filled to near capacity but the other three centers were nearly empty. Some unhoused residents in the same article said they did not know about the seriousness of the storms, they did not hear shelters were opened, or they didn't have transportation. Sacramento County's Department of Human Assistance issued a press release that motel vouchers would be issued to the unhoused, but there was no clarification about how to get them. Some of the unhoused had their tents partially or totally submerged and several had to be rescued when the water abruptly overwhelmed their campsite.

Long-term planning is essential with participation among all stakeholders—the unhoused clients or those living in vulnerable situations, the homeless advocates and care provider individuals and nonprofits, government organizations, and supportive businesses and residents as well as those upset about the impacts of people living on the street to their businesses and to land values. Building social housing or affordable housing that is not climate resilient will contribute to global warming and it may not be livable depending upon the extreme weather situation that occurs, like the extreme heat that hit the US and Canada in summer 2021. The covid pandemic has demonstrated the importance of individual rooms vs communal rooms in social housing.

Establishing resiliency hubs in areas where people will use them and have easy access to them could provide a real solution for extreme weather events. Hubs can not only supply cooling, heating or air purification, but also can provide local jobs to support these activities and neighborhood residents. Medical supplies or N95 masks may be stored. In disasters, this can be a local coordination center to check on vulnerable residents and get medical help to people who need it. Bedding, cots and other supplies can be stored for use when people need to stay at the center overnight. The center can have a reliable computer, phone or radio system to ensure communication between the neighborhood and emergency services. Developing mobile services to warn of impending extreme events and to transport unhoused persons to shelters is also needed..

# Community Resilience

The City and the County need to increase overall resilience in the face of increasing weather extremes and climate related disasters that come with the warming climate.

We recommend that the City and County:

1. Support the creation and expansion of resilience hubs for ongoing challenges of climate emergency and for dealing with natural disasters; at the hubs:
  - a. Provide hubs in community facilities with farmers market space, food hubs and seed swaps, support for gardening and composting; communication centers, power for medical devices and cell phones, and coordination of resource distribution and services
  - b. Provide cooling and heating support for weather extremes using solar power;
  - c. Reduce the need to go long distances for basic necessities;
2. Address public health issues of climate change, and
3. Use solar power and provide ordinance support for SMUD solar programs and the rooftop solar industry. Equip the resilience hubs with solar power and battery backup systems.
4. Place a special focus on low income/vulnerable communities.

According to the Urban Sustainability Directors' Network, climate resilience is “the ability to anticipate, accommodate and positively adapt to or thrive amidst changing climate conditions or hazard events and to enhance quality of life, reliable systems, economic vitality and conservation of resources for present and future generations.”

<sup>12</sup>

## Resilience Hubs

Our city, to remain sustainable, must not just react to the dilemma of rapid climate change, but be proactive by developing regenerative practices that support community resilience. The development of resilience hubs is a way to address current everyday issues in our communities such as food insecurity, and access to health care, and at the same time can provide a way to prepare for the effects of climate change and climate disasters.

These hubs can be housed in already existing facilities: churches, public facilities or community organizations. Hubs can offer support to local residents, operate as cooling centers in the summer, and a refuge in the winter with a communication center operating as a power hub for medical devices, computer and internet services, as well as cell phones in times of emergency.

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<sup>12</sup> Urban Sustainability Directors' Network ([usdn.org/resiliencehubs.html](http://usdn.org/resiliencehubs.html)) p.6.

Hubs can offer coordination of resource distribution and services before, during and after a disaster. Food hubs can be colocated with these resilience hubs. If designed and run well, hubs can lower GHG emissions by operating their own microgrid. If upgraded to enable emergency assistance and equipped with solar power and battery backup, they can provide a backup power source to our utility energy grid during power outages. A smart investment, these hubs can potentially lower the burden on local emergency response teams and become part of an emergency network, including addressing public health needs. .

One nearby example in neighboring Yolo County, is a partnership including private and public entities. The pilot Yolo County Energy Resilience Hub partnership is seeking American Rescue Plan (ARP) funding. This hub would add microgrid energy technology to a community facility such as a health clinic, to be utilized in the event of a mandatory power shut down and aimed at serving their most vulnerable communities during severe weather events. In addition to the medical services, the hub will provide cell phone and computer/internet services. During normal times, it can operate as a cultural/community/Youth Center that offers the same internet access as well as health services if that kind of facility is available. (Draft: Capay Valley Health & Community Center)

The Urban Sustainability Directors' Network (USDN) offers Resilience Hub Guidance via their website, [usdn.org/resiliencehubs.html](https://usdn.org/resiliencehubs.html). Their PDF includes six phases of development from assessment, to site development, to the operating plans. USDN's approach is equity based with a focus on lower income communities with limited resources. Its website addresses cost and funding information as well as resources for local funding through non-profits, foundations, local, state and federal governments as well as utility incentives. There is also information about a USDN Team available for consultation and assistance to a wide range of entities, including municipal or county governments.

## Resilience in view of a disaster

Being disaster resilient means being linked with local networks, i.e. emergency services and community organizations. Effective networks can share expertise and knowledge and build better local emergency plans. Those plans enable collaboration and coordination in responding to disasters and emergencies, as well as linking the unhoused to these networks.

“Policymakers should consider the potential for households’ existing solar when formulating strategies and plans for disaster preparedness, including early warning systems, communication during recovery and provision of health care and ensuring safety and the potential for solar to contribute to the resilience capacity of vulnerable populations.” (ODI.org/media/docs/11955.pdf (Overseas Development Institute) “How Solar Households Contribute to Resilience”)

## Composting, Community Gardens and a Greener Community

We recommend that the City and County::

1. Keep our organic waste within our county. and invest in programs that process Sacramento household and green waste to create compost for use in municipal and residential landscaping.
2. Promote and support an urban gardening program as a sustainable practice.
3. Collaborate with the SMUD's and the Tree Foundation's current free tree planting program to encourage and support the planting of urban trees.

Food waste ending up in our garbage, and then ending up in the landfill, produces methane gas which is more immediately damaging to the environment than CO<sub>2</sub>. With the advent of SB1383 which mandates Californians to dispose of their organic household waste in their green cans as of January 1st, 2022, this methane production problem will begin to be addressed. The City and the County of Sacramento should follow the example of the city of Ann Arbor. They will address the other half of this problem of methane production. Ann Arbor not only collects, but also composts household organic waste at their municipal facility, and they offer the compost free to the public as well as use it for their municipal landscaping.<sup>13</sup> The City of Sacramento and the County need to keep our organic waste within City and County boundaries, versus transport it outside of our area. Keeping composting localized enables the practice of using that compost for CO<sub>2</sub> sequestration in the Sacramento area where it is needed.

An urban garden program is another sustainable practice that should be promoted and supported by our local governments. Gardens can be established in empty lots, or green spaces and in residential backyards in our region. They can contribute to the promotion of more local food, and more food independence for residents while increasing vegetation and tree planting, which sequesters more carbon. All these actions promote cohesion of neighbors and neighborhoods. Yolo Climate Emergency Coalition and Yolo Farm to Fork are combining their ARP proposals for a joint partnership focused on nine to twelve school gardens in Yolo County. The focus is to improve nutrition of children in Title 1 schools and their families by sustaining edible school gardens, along with other assistance around food and food preparation in the schools. The goal of this proposal is to advance food security, food sustainability and food sovereignty.

The need to establish more tree cover will have to involve many players. Utilities' power and gas lines, access to water, and zoning issues are some of the issues. Maps of prospective areas for planting need to be developed and problem solvers engaged in determining where to plant now, and in the future in the areas where the access issues are resolved. Creating green zones with

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<sup>13</sup> [The A2 Zero Carbon Neutrality Plan | The Ann Arbor Climate Partnership \(a2cp.org\)](https://www.a2cp.org/)

native, xeriscape plants can be a second-best substitute for some difficult areas to at least provide some dampening of the effects of heat.

# Carbon Sequestration

## **We recommend that the City and County::**

1. Include a Natural Sequestration program as part of the carbon free by 2030 plan.
2. Conduct Carbon Farming workshops available to all farmers and residents.
3. Immediately incorporate Urban Forests into the existing landscape.

If we are to attain our necessary goal of carbon free by 2030, an active, accelerated natural carbon sequestration program must be included as part of the working plan.

Natural carbon sequestration is an organic cycle that has been happening on this planet for billions of years. The process by which nature maintains a balance of carbon dioxide and oxygen in our atmosphere suitable for sustaining all life on, in, and including the planet itself.

Our soil can save us by way of sequestration.

"A mere 2% increase in the carbon content of the planet's soils could offset 100% of all greenhouse gas emissions going into the atmosphere".

-Dr. Rattan Lal, Professor of Soil Science, Ohio State University

Long accepted industrialized crop farming practices have over time led to depletion and degradation of our soil including pollution of our local waterways by way of tilling and pesticide and fertilizer use. Continuing these practices can lead to desertification, the turning of viable lands of rich soil into dirt. Per a Tufts University study, California has an aridity coefficient of 78% caused by overgrazing, use of pesticides, urbanization, forest fires, drought and "water stress." This study also labels significant areas within and around Sacramento County as 'highly' and 'most' vulnerable to desertification.<sup>14</sup> California recently passed legislation focused on saving its aquifers. It is now time to discontinue "business as usual".

Regenerative agriculture or farming is "a system of farming principles and practices that increase biodiversity, enrich soils, improves water cycles and enhances ecosystems." (arcadiafarmco.com). Combined practices of no till, regenerative farming and regenerative ranching not only pull CO2 from the air, they build soil health, stimulate plant and root growth, reduce evaporation, reduce soil compaction increasing soil's water-holding capacity, which reduces water runoff and pollution of nearby water systems.

"For every 1 ton of carbon stored in the soil, more than 3 tons of carbon dioxide will have been removed from the air. Healthy soil not only supports vigorous plant growth but also creates more

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<sup>14</sup> "The Golden State Crisis" 7/6/21, Mitesha Shree Shakya -subtitle: "Identifying the Most Vulnerable Areas to Desertification in the State of California"



nutritious fruits and vegetables, minimizes plant diseases and bug blight, and holds up to 30% more water".<sup>15</sup>

Carbon farming involves implementing regenerative practices that are known to improve the rate at which CO<sub>2</sub> is removed from the atmosphere and converted to plant material and/or soil organic matter" (arcadiafarmco.com). Carbon farming needs to be part of the sequestration planning and not considered an "offset" or as an "afterthought" to be utilized should we not make our GHG reduction goal.

Creating mini urban forests within our various cities and suburbs will not only benefit citizens by sequestering carbon, but will also help filter stormwater, reduce runoff, provide animal habitat, and provide much needed shade for our communities. The trees must be native to our region in accordance with the natural ecosystem that exists.

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<sup>15</sup> Sierra Club, Loma Prieta Chapter, Soils Committee

# The Costs of Climate Inaction ( Or why we need to reach Carbon Neutrality by 2030 NOT 2045)

## We recommend that the City and County::

1. **The County, City and SMUD need to act with a clear sense of urgency and purpose to reach carbon neutrality by 2030 to avoid catastrophic costs** due to climate change. The costs include 100's of billions of lost dollars, the extinction of over one-million plants and animals and the premature deaths, loss of livelihoods and disruption of the communities and cultures of millions of people.
2. **Initiate a committee to research and consider forming a Public Bank of Sacramento as has been done by 25 other states and 18 California municipalities including Cities and Counties of San Francisco and Los Angeles** jointly (<https://publicbankinginstitute.org/local-groups-by-state/>). This could safely generate funds to defray many of the costs associated with building the green infrastructure, generating the sustainable jobs, and assisting with housing the houseless- all of which are necessary to achieve carbon neutrality and community resiliency. In doing so, Sacramento funds would be divested from Wall Street banks with insecure schemes and the underwriting of future fossil fuel projects.
3. **Recommend local jurisdictions research and introduce climate program funding mechanisms** to accelerate the implementation of climate mitigation and adaptation programs.
4. **Ensure success in reaching the City's Climate Emergency Declaration's 2030 Carbon Neutral Goals by implementing as well as inspiring and educating the public** with the City's annual goals up to the 2030 deadline such as the following:
  - a. SMUD's forward thinking campaign: "Clean Power City by 2030"
  - b. "Drive Less Sacramento"- walk, bike or ride more
  - c. Make public transportation irresistible: "Why Drive?" Further incentivize City, State and County workers to "park and ride" by adequately funding more rapid and efficient public transportation.
  - d. "Make your next car an EV" and to borrow from the Sonoma collaborative, "EV access for All": Collaborate with SMUD and the County to install EV chargers and with GIG car companies.
  - e. "Electrify for your Health"- Gas appliances increase the risk of asthma in Kids by 40%!
  - f. Develop and advertise an ordinance for Rideshare, car rental and cab companies to convert 10% of their vehicle fleets each year to reach all EV's by

2030. (Shenzen, China, a city of 12 million achieved an all electric taxi fleet by 2020.)

- g. Kick the Single use Habit-” Plastic is Choking our Planet.” City ordinances to ban styrofoam and encourage reusable takeout ware by customers and entrepreneurial companies.

Most of us are now aware of the dramatically accelerated pace of climate change: Just this October, we Sacramentans experienced a record setting 212 continuous days without rain and then a severe storm with the most amount of rain ever recorded in our city’s history. Catastrophic wildfires, storms, and droughts plague our thoughts. “Seas are warming and rising faster, [putting more cities](#) at risk of tidal flooding or worse. Glaciers are melting at a pace many researchers did not expect for decades....scientists from the Potsdam Institute for [Climate Impact Research in Germany](#) and other institutions warned that the acceleration of ice loss and other effects of climate change have brought the world “dangerously close” to abrupt and irreversible changes, or tipping points...the consideration of tipping points helps to define that we are in a climate emergency,” (NYT Henry Fountain, Dec. 2019, updated Nov. 2021)

In view of the above, and the recent devastating California wildfire seasons we can no longer use the State’s 2045 Carbon neutral goal as it is out of date with the scientific consensus.

We must act with urgency and clarity to implement the 2030 carbon neutral goal which the City set forth when it declared a Climate emergency in 2019! Since elected officials are always forced to look at the bottom line and public safety in deciding on a project, we ask you to consider the astronomical costs of climate inaction or a slow response (in this case, the 2045 carbon neutral goal) -a subject that has been the topic of numerous assessments and research papers lately.

**Here are some of the typical costs:**

1. [Financial](#)
2. [Human Losses](#)
3. [Species Extinction](#)

## Financial

“If we do not address the climate crisis with the urgency it demands, we will soon be spending hundreds of billions of dollars a year to deal with the damage and destruction” and will be no better off than before the expenditures! (Democratic Senate Monograph on the costs of climate inaction).

A study done by the European Central Bank utilizing data from 2.3 million businesses and 1600 banks looked at outcomes to the economy of three scenarios of climate action: Rapid; late climate action starting after 2030; and a scenario of business as usual (or doing nothing) to combat climate change. The study revealed that the costs of doing nothing were forty percent more than rapid action and the risks of company default was much higher. “The short-term costs of transition pale in comparison with the costs of unfettered climate change in the medium to long term.” This study was done only for businesses which generally have no responsibility to rescue, shelter and compensate the victims of disasters as governments do.

According to a report by ProPublica, “Eliminating as much carbon dioxide emissions as possible now would reduce the cost to taxpayers later. The National Climate Assessment estimates that limiting warming to around 2 degrees Celsius would reduce economic harm in many cases by 30% to 60%.” (Article by A. Lustgardten 10-28-21)

2020 set a new record with 22 separate billion-dollar weather and climate disasters in a single year. The cost of California wildfires in 2018 was \$149 billion - over two-thirds of the annual budget! (Per the Climate Center’s Webinar Human and economic costs of climate inaction 11-2021 ) The largest ever survey of 738 climate economists conducted by the Institute of Policy Integrity in New York found that “Costs are often cited as a reason to delay or avoid strong action on climate change, but . . . the weight of evidence is on the side of rapid action.” A recent Reuters poll of climate economists in Europe, Asia and the Americas, conducted before the Glasgow UN talks on Oct, 31 - Nov. 12, 2021, showed a strong consensus of views on the benefit of early and coordinated action.

A comprehensive study by researchers set out in an article published in Nature Communications addressed the cost of inaction. The study found that although there is a large abatement cost in the short-term, inaction to climate change will lead to substantial socioeconomic losses in the future. A self-preservation strategy balances the long-term benefit obtained by climate mitigation and the short-term abatement cost. (Wei, YM, Han, R., Wang, C., et al.) Self-preservation strategy for approaching global warming targets in the post-Paris Agreement era. Nat. Community 11, 1624 (2020), <https://doi.org/10.1038/s41467-020-15453-z>.

ARkStorm scenario “addresses massive U.S. West Coast storms analogous to those that devastated California in 1861-62 and with magnitudes projected to become more frequent and intense as a result of climate change.” (USGS website) This simulation was a result of a gathering of over 9 scientific organizations including NOAA, USGS, FEMA, CalEMA, and others, calculated that the cost of such storms would be nearly \$1 trillion in today’s funds according to Daniel Swain, a climate scientist from UCLA. This simulation also calculated that approximately 1.5 million people would have to be evacuated. “That’s just one specific hypothetical example of one major regional disaster for which the odds are increasing due to climate change. There’s no reason why this couldn’t happen more than once in the same region.  
..”

The studies discussed above show the high economic cost of waiting to take action. These increased costs, which could be avoided by taking action now, will be borne by government entities, businesses in our communities, and the people who live and work in our region.

## Human Costs

Per the World Health Organization, “Climate change is the biggest threat to humanity. Between 2030 and 2050, climate change is expected to cause approximately 250,000 additional deaths per year, from malnutrition, malaria, diarrhea and heat stress.” In California many vector borne illnesses have been increasing. Drought appears to increase the prevalence of West Nile Virus. Of the two other significant mosquito borne viruses the WEEV (Western Equine Encephalitis Virus) prevalence decreases with increasing temperatures whereas SLEV (Saint Louis Encephalitis Virus) increases with increasing temperatures.

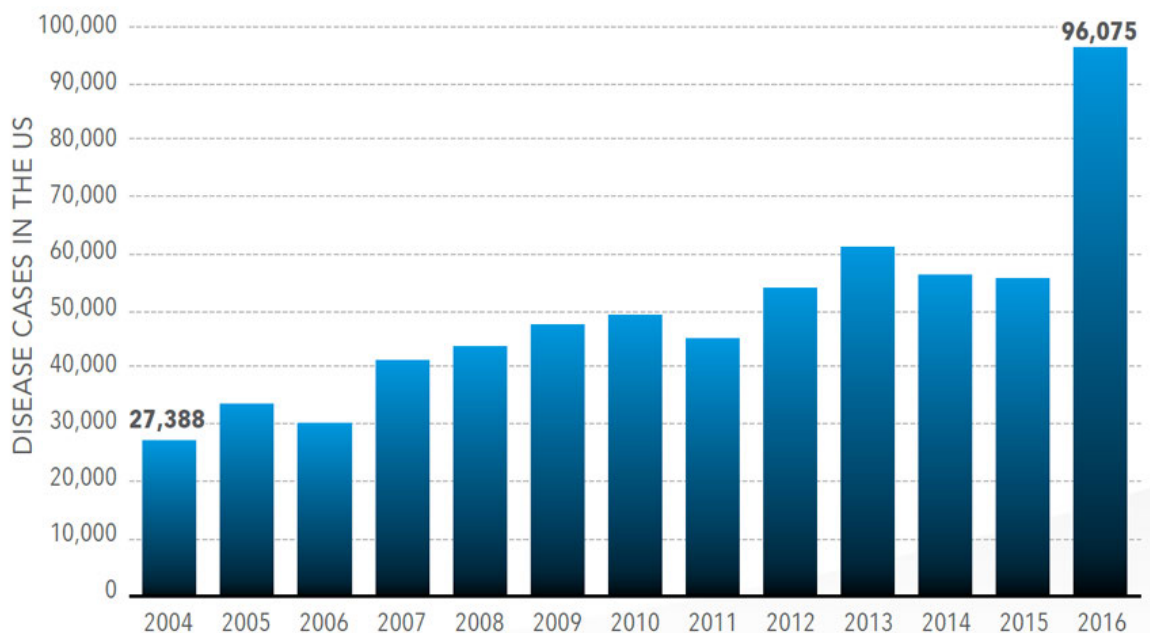
Two new invasive mosquitoes have been found in California—the yellow fever mosquito and the Asian Tiger mosquito which could potentially transmit several viruses, including Zika, dengue fever, chikungunya, and yellow fever viruses. (Office of Environmental Health Hazard Assessment, California Environmental Protection Agency (2018). Indicators of Climate Change in California.) “Prolonged hot dry periods may reduce tick abundance and therefore decrease Lyme disease risk in some locations, although if relative humidity is maintained, an increase in temperature may increase the number of infected ticks.” (Eisen et al., 2003)

According to The Climate Reality Project, vector borne illnesses including Lyme disease, West Nile virus, Malaria and vibrio (flesh eating bacteria) have significantly increased rates and geographic ranges. Specifically, in the US, the number of cases of Lyme disease doubled between 2004 and 2016 due to warmer temperatures and shorter winters.

By 2050 it is estimated that there will be 3 times the number of lives lost due to heat waves in the US alone. According to ProPublica’s A. Lustgarten, in the southern half of the US, without rapid climate action, “... heat alone will cause as many as 80 additional deaths per 100,000 people — the nation’s opioid crisis, by comparison, produces 15 additional deaths per 100,000.” Unless we initiate a rapid and just transition to carbon zero, communities of color and of lower socioeconomic status will suffer the largest consequences of climate change.

Asthma, cardiovascular disease and diabetes, among others, will continue to be brought on by exposure to fossil fuels in California homes, roads and populated sites near fossil fuel extraction sites. Disadvantaged Communities will suffer especially from these environmental injustice issues if we do not reach Carbon zero by 2030 or faster. EPA website)

## Disease cases from infected mosquitoes, ticks, and fleas have tripled in 13 years.



SOURCE: CDC Vital Signs, May, 2018

Although there is no causal link to climate change, there is a definite correlation, in the above table, with increasing temperatures over the last ten years.

With unabated global warming, climate refugees will increase not just in Africa but all over the globe. “Across the United States, some 162 million people — nearly 1 in 2 — will most likely experience a decline in the quality of their environment, namely more heat and less water. For 93 million of them, the changes could be particularly severe. In Central America, 5 consecutively severe years of drought and multiple hurricanes have been devastating: “In Honduras, 31% of the population is experiencing crisis levels of food insecurity, as is 23% in Guatemala and 10% in El Salvador, according to the UN’s global report on food crises.” (Bloomberg Businessnews) These conditions have contributed to the ranks of refugees in the southern US border.

## Species Extinction

According to a UN Report from May 2019, “1,000,000 species [are] threatened with extinction” ( Report from the UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) [bit.ly/IPBESReport](https://www.ipbes.net/reports-and-publications/ipbes-report) ). According to IPBES Chair, Sir Robert Watson the report “ tells us that it is not too late to make a difference, but only if we start now at every level from local to global,” and “through ‘transformative change’, nature can still be conserved, restored and used sustainably. “ ( UN Website) The National Academy of Sciences states that by

sticking to the Paris agreement we would stand to lose fewer than 2 out of 10 species, “. . .But if humans cause larger temperature increases, we could lose more than a third or even half of all animal and plant species, based on our results.” (USA Today 2-14-2020)

According to EDF's David Festa, by controlling methane emissions, and assisting farmers in regenerative agriculture, extinctions can be prevented: “Working lands can provide invaluable breeding grounds and migratory corridors for threatened species” as is the case with many pollinators upon which California's \$11.7 billion pollinator crops and human food security depend.

**What we Stand to Gain with Rapid and Definitive Action:** The accelerated phasing out of fossil fuels could simultaneously solve many of our other societal issues by:

1. generating thousands of well-paying jobs in the green energy, conservation, sustainable mass transit and other green infrastructure fields;
2. eliminating the environmental injustice that for years has harmed lower income communities and communities of color where fossil fuel extraction, and fossil fuel plants have been located;
3. expanding efficient public transportation and safely transitioning our streets for bicycle use and other active modes of transportation which will help tackle our society's lack of human connection and regular joyful exercise; and
4. significantly decreasing air, water and soil pollution due to the elimination of diesel and other fossil fuel exhaust, fracking operations and environmental toxicity from plastics.

In the words of President Biden: **“The most unaffordable path forward is inaction.”**

# Collaboration

**We recommend that the City and County:**

**The City, County and SMUD need to work together to meet their common carbon free by 2030 goals;**

**The City and County should:**

- 1. Develop a joint plan that identifies high priority projects**
- 2. Adopt ordinances and regulations**

We believe that the City and County of Sacramento should formally collaborate with other agencies to ensure the 2030 Carbon Free goal of their mutual climate emergency declarations are met. Benefits include:

- Leads to more efficient execution of projects. Faster!
- Leads to more inclusive public engagement, meets more environmental justice needs.
- Agencies will see cost savings.
- Agencies experience a collective impact– they get a lot more done!
- Allows for creation of an oversight committee or Board to monitor progress.

Only by working together to take immediate action will the world solve the climate crisis. We can role model this here in Sacramento!



## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Trees for <b>Last Name:</b> Sacramento
<b>Email</b>	████████████████████
<b>Message</b>	Please accept, print and review the attached comments from several core members of Trees for Sacramento
<b>Upload File(s)</b>	T4S Climate Action PlanFin7.29.22.pdf

July 29, 2022



**Climate Action and Adaptation Plan Preliminary Draft, Comments by Trees for Sacramento to the City of Sacramento Climate Action Team**

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 is vitally dependent 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.

In response, and to advise of future public hearings, please communicate via email to [trees4sacto@sbcglobal.net](mailto:trees4sacto@sbcglobal.net); our postal address is 5601 Monalee Ave, Sacramento, CA 95819.

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 CO<sub>2</sub>e). 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 CO<sub>2</sub>e in 1 year. Alternatively, planting 17 new trees removes about 1 MT CO<sub>2</sub>e from the atmosphere over 10 years."

Removing trees likewise adds MT CO<sub>2</sub>e, but this plan fails to account for ongoing loss of tree canopy, resulting increases in MT CO<sub>2</sub>e, 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 costs...." 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?

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.

### **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.

**Please review our attachments for more detailed explanation of the comments made here.**

<b>Full Name</b>	<b>First Name:</b> Trees for <b>Last Name:</b> Sacramento
<b>Email</b>	████████████████████
<b>Message</b>	Please accept, print and review the attached comments from several core members of Trees for Sacramento
<b>Upload File(s)</b>	T4S Climate Action PlanFin7.29.22.pdf



**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. The instruction to adjust the budget suggests that accumulated funds may be diverted to another program without Council review.

## **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.

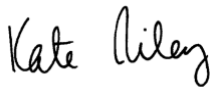
## Request for Information, Transparency and Regular Evaluation of the Urban Forestry Program

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](mailto:trees4sacto@sbcglobal.net).

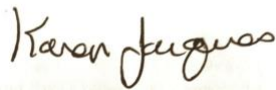
Thank you for your attention and concern.




Kate Riley



Jude Lamare



Karen Jacques



Gretchen Steinberg



Dan Pskowski



Jim Pacht



M. N. Kelly



## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Trees for <b>Last Name:</b> Sacramento
<b>Email</b>	████████████████████
<b>Message</b>	Attachments to the Trees for Sacramento comment letter submitted this morning; please receive, print, and review with the comment letter. Thank you
<b>Upload File(s)</b>	UFMP recommendations 3.29.19 .pdf UFMP Best Practices Recommendations final 3.29.19.pdf

**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**

<b>Year</b>	<b>Percent Canopy Coverage</b>	<b>Source</b>
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?*

#### Conduct Annual Program Evaluation with Transparency and Reporting

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 CO<sub>2</sub> 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 CO<sub>2</sub>, 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 CO<sub>2</sub> sequestration.

**The UFMP should call for the development of a measure for CO<sub>2</sub> 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

- “A Guide to Preserving Trees in Development Projects”  
Penn State College of Agricultural Sciences, September 12, 2017
- Developer Guidelines for City Street Trees  
City of Sacramento, 1994
- “Urban Forest Action Plan 2016 Implementation Update”  
City of Portland, October 2017
- “A municipal forest report card: Results for California, USA”  
E. Gregory McPherson, Louren Kotow, *Urban Forestry & Urban Greening* 12 (2013) pp. 134-143
- “Performance testing to identify climate-ready trees”  
E. Gregory McPherson, Allison M. Berry, Natalie S. van Doorn  
*Urban Forestry & Urban Greening* 29 (2018) pp. 28-39
- “Climate ready urban trees for Central Valley cities”  
E. Greg McPherson and Alison M. Berry, *Western Arborist*, Spring 2015
- “Re-Oaking California” in *California Trees*  
Winter 2018, Published by California ReLeaf
- “Focus Areas for Sacramento’s Tree Canopy”  
Presentation to UFMP Stakeholder Representative Group  
Second Meeting, July 2018
- “Year One – Tree Ordinance Update,” May 1, 2018  
To Mayor and City Council Members from Hector Baron, Director of Public Works
- “Sacramento Climate Action Plan 2012”
- “Sacramento 2035 General Plan,” Adopted March 3, 2015
- “Trees Grow on Money: Urban Tree Canopy Cover and Environmental Justice”  
*PLoS ONE* 10(4): e0122051. doi:10.1371/journal.pone.0122051  
Schwarz K, Fragkias M, Boone CG, Zhou W, McHale M, Grove JM, et al. (2015)
- “Report: Global Warming Of 1.5 Degrees Celsius,” IPCC, October 2018
- “Urban Forest Management Plan”  
International City/County Management Association, October 1, 2014
- “Urban Tree Canopy Assessment”  
Sacramento, CA 2018, Davey Resource Group
- “Urban Forest Resource Analysis”  
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 Berkeley 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 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.

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Trees for <b>Last Name:</b> Sacramento
<b>Email</b>	████████████████████
<b>Message</b>	Attachments to the Trees for Sacramento comment letter submitted this morning; please receive, print, and review with the comment letter. Thank you
<b>Upload File(s)</b>	TreeOrdinancereviewvfi3.11.21.pdf



## 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. The instruction to adjust the budget suggests that accumulated funds may be diverted to another program without Council review.

## **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.

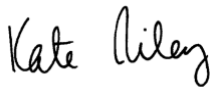
## Request for Information, Transparency and Regular Evaluation of the Urban Forestry Program

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.

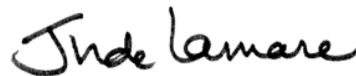
We ask that the City Council direct Urban Forestry and the Department of Public Works to prepare a report back to the Council by December 31, 2021 on the implementation of the 2016 Tree Ordinance Update and the performance of Urban Forestry programs in each fiscal year and cumulatively. The report should 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](mailto:trees4sacto@sbcglobal.net).

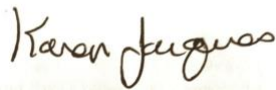
Thank you for your attention and concern.




Kate Riley



Jude Lamare



Karen Jacques



Gretchen Steinberg



Dan Pskowski



Jim Pachl



M. N. Kelly



<b>Full Name</b>	<b>First Name:</b> Kate <b>Last Name:</b> Wilkins
<b>Email</b>	[REDACTED]
<b>Message</b>	On behalf of 350 Sacramento, I'm submitting this set of comments on the City's Draft Preliminary CAAP. These comments are from multiple technical experts and area organizations, not just 350 Sacramento. This group met over the last month to discuss the components of the CAAP, and given the short time frame, provide a broad set of comments on many of the sections. The individual organizations listed in the document have not necessarily endorsed the document as a whole.
<b>Upload File(s)</b>	Preliminary Draft CAAP Community Review.docx Preliminary Draft CAAP Community Review_PDF.pdf

# Preliminary Draft CAAP Review

## Introduction

Thank you for the opportunity to comment on the City of Sacramento's Preliminary Public Review Draft of the Sacramento Climate Action Plan.

350 Sacramento is a local grassroots organization committed to equitable solutions that accelerate the transition to a sustainable future, with atmospheric carbon dioxide levels below 350 ppm. We support local initiatives that work to reduce greenhouse gas emissions and promote low carbon lifestyles with equitable solutions for all communities.

To prepare our comments on this draft plan, we convened a group of local experts and organizations<sup>1</sup> and obtained their input. This document represents a compilation of the input we received. We have organized the comments by topic, but have not attempted to synchronize or summarize them, as we believe that City staff will benefit from reviewing the specific points raised in each organization's input. Many of these experts and organizations will also be submitting their own comments, which may be more detailed or expansive than those presented here.

We urge you to make public all the comments you receive on this and future drafts. This will ensure a transparent process that fosters engagement and collaboration.

Set forth below are a set of overarching comments on the preliminary draft, as well as detailed comments on Sections 6, 7 and 8.

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<sup>1</sup> In addition to 350 Sacramento, organizations that provided input include: Environmental Council of Sacramento, Civic Thread, Sacramento Area Bicycle Advocates, Sacramento Transit Advocates and Riders, Sacramento Valley Chapter of the California Native Plant Society, Sacramento Audubon Society, Sierra Club Sacramento Group, Xerces Society, and Trees for Sacramento. Some individuals who are unaffiliated with any area organization also provided input. The Sacramento Climate Coalition provided helpful reference material for reviewers. This document is a 350 Sacramento document; the individual organizations listed here have not necessarily endorsed the document as a whole.

# Overarching Comments on Preliminary Draft CAAP

In addition to more detailed comments on the specific measures, we offer the following overarching comments. Overall, the plan **lacks a sense of urgency**. The City Council declared a climate emergency in December 2019. The ongoing failure to treat climate as a crisis is reflected in the preliminary plan's omission of key sections including adaptation and equity, the lack of a concrete funding/financing plan, and vague implementation timelines and measures.

## Failure to address adaptation

We are very disappointed that the draft does not address adaptation, especially in light of the City Manager's representation to the City Council's Budget and Audit Committee that a complete draft would be released on July 1. Adaptation measures are important for the entire city, and especially for our underserved communities. **We urge you to release this important portion of the draft prior to the release of the second draft** so that there is ample time for review and comment.

## Failure to address key Mayor's Commission on Climate Change (MCCC) recommendations, including equity

We appreciate that some of the MCCC recommendations are used as a framework for the plan. However the Commission also made important recommendations on Equity and on Foundational Principles (Urgency, Advocacy, Accountability, Education, Financial and Economic Sustainability). These are critical to developing and implementing a successful climate plan. **The plan should include sections that directly address both Equity and the Foundational Principles recommended by the MCCC.**

## No funding plan

The City's climate office has been understaffed and underfunded since inception. The preliminary draft is two years behind schedule and still incomplete. The City must take steps now to ensure that implementation begins right away. Appendix D, Funding and Financing Strategy, identifies the need for at least six new staff positions and \$3.2 billion in funding/financing. Although several options for funding are presented, there is no actual proposal or plan, and some of these options require legislation or voter approval which take substantial time. **The final draft presented to the City Council must be accompanied by an actionable proposal for the necessary staffing and financial resources.**

## **Insufficient accountability**

As proposed, the Implementation and Monitoring proposal does not lay an adequate foundation to ensure accountability. This is discussed in greater detail in the comments on Section 8. At a high level, recommended changes include: **a single centralized point of accountability, more frequent reporting to council, stronger specificity in the measures, and a more detailed implementation timeline.**

# Built Environment Review

## *Measures E-1, E-2, E-3, E-4 and TR-3.1*

### Specific Comments on Measures:

#### *Measure E-1: Support SMUD as it implements the 2030 Carbon Zero Plan*

**Can the City claim these savings?** This CAAP measure calls for support of SMUD’s Carbon Zero Plan (CZP) which pledges to eliminate greenhouse gas emissions from its power supply by 2030. The CZP will accomplish this by staging the shutdown of the natural gas cogeneration power plants, followed by repurposing the Cosumnes power plant for hydrogen or biogenic fuels. This can only be accomplished by replacement power from renewable sources, including expansion of the Solano Wind facility, new renewables contracts and the addition of two major photovoltaic and storage farms now under consideration. It remains unclear what role the City can play in these efforts, and why the CAAP should be claiming full credit for SMUD’s resulting GHG savings. The City should not be relying on savings from SMUD to justify delaying reductions within the City’s purvey.

**How were the GHG savings calculated?** For background purposes, it would be useful for more detailed clarification on how the CAAP determined the 576,225 MT CO<sub>2</sub>e figure for CZP GHG savings. Until the adoption of its CZP, SMUD was adhering to the SB-100 mandate for 60% renewable power requirement by 2030. Under this regulatory scenario SMUD would be emitting 1.35 million metric tonnes (MT) of CO<sub>2</sub>e in that year<sup>2</sup>, which would be the SB-100 adjusted base of savings for the CZP. If we assume roughly 35% of that total can be attributed to the City of Sacramento<sup>3</sup>, the E-1 measure “savings” would be around 472,500 MT, which is 20% lower than what the CAAP reports.

#### *Measure E-2: Eliminate Natural Gas in New Construction*

We congratulate the City adopting the new construction all-electric building ordinance which takes effect in 2023 as part of the first-year Mayors’ Commission on Climate Change recommendations. If exemptions are limited in scope, this will be a great first step towards eliminating the use of natural gas in the City.

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<sup>2</sup> Prior to the adoption of the CZP in 2021, SMUD set the original SB-100 goal of 1.35 million metric tons GHG for 2030 in its Integrated Resource Plan in October 2018 under Strategic Directive 9 (SD-9). The CZP zeroed out this original goal.

<sup>3</sup> The California Department of Finance estimated around 33% of the County’s population lived in the City of Sacramento in 2022

### *Measure E-3: Transition natural gas in existing buildings to carbon-free electricity by 2045*

#### **Timeline**

We support the timeline proposed in the draft CAAP, with no expansions of gas lines beginning in 2023 and required electrification of existing gas appliances on replacement starting in 2026. This approach is not only quite possible, but necessary for successfully meeting E-3's goals for 2030.

#### **E-3.2**

The California Energy Commission reports state-wide permit compliance for HVAC and water heaters at only around 10%. With so many equipment replacements escaping permitting, the City should focus on increasing the permit capture rate as a means of encouraging more electrification. SMUD requires permit compliance to be eligible for its lucrative incentives, but many installations still occur in the City and County without permitting, often with a homeowner not even knowing that permitting is required.

Adopt enforceable Building Code requirements that will ensure that all electrification replacements are permitted when required, followed by mandatory permit certification at time of sale. This approach would be similar to the resale program in the City of Davis. This course of action will require expanding the permitting staff to better manage the needed increased workload, with the added costs offset by enhanced permit fees.

Another measure that could bolster adoption of electric equipment would be to require replacement of any gas equipment of a certain age (10-15 year), at time of sale. This would not impact as many replacements as the City's proposed requirement to convert to electric beginning in 2026, but could be a way to bring more awareness to building and home owners beforehand.

#### **E-3.4**

Initiate an educational program during the permitting process, aimed at contractors and building/homeowners, on the available incentives and other benefits of electrification. The program should also encourage permit applicants for remodels to consider panel upgrades and wiring to prepare for future electrification additions. Additionally, outreach should be done to the realtor community.

#### **E-3.5**

Streamline the permit process for the installation of heat pump and induction appliances. This will reduce the time required by both contractors and City staff and **act as an incentive** to promote the voluntary replacement of gas appliances with electric alternatives before mandatory replacement takes effect in 2026.

## Tracking and Measurement


Measure E-3 sets a 28% reduction in GHG from natural gas by 2030 (or 119,000 MT) and 74% by 2045. For its part, SMUD codified its building electrification goals in its Strategic Directive 9, approved April 2021: *“Pursue energy efficiency and electrification to reduce carbon emissions by 365,000 metric tons from buildings ...in 2030 (the equivalent of 112,000 single family homes”*.

Again, scaling this value to the City’s approximate 35% share, SMUD’s goal for the City comes to around 128,000 MT, which is reasonably close to the CAAP’s estimate for 2030. Even so, it would be very helpful to see more detailed modeling of the forecast savings, particularly the expected equipment capture rate. For the approximate 200,000 households in Sacramento<sup>4</sup> and a 15-year equipment life, the turnover rate for HVAC and water heaters would be around 13,000 – 15,000 replacement units annually. But a review of 2018 permit data, excerpted in Figure 1, confirmed far fewer than this expected volume of equipment replacements and even smaller number of reported electric changeouts. This finding further emphasizes the need for more robust permit certification and enforcement.

With some refinement the City’s permit database could prove a valuable tool for tracking equipment changeouts to electric. But it would have to be combined with other metrics that estimate the overall percentage capture rate compared to the total equipment in the existing building stock, combined with information on dwelling types and vintage that can be used to estimate GHG savings. Appendix A provides an example of this type of modelling. It illustrates a scenario for a 36% potential reduction in GHG by 2030 given gas furnace replacement with heat pumps that increase after a presumed ordinance in 2026.

### Total GHG From Space Heating

All Units

	2022	2023	2024	2025	2026	2027	2028	2029	2030
Gas furnance	318,821	316,839	314,389	308,981	296,003	279,780	261,394	241,926	220,295
Plus OrigHP	17,367	15,196	13,025	10,854	8,684	6,513	4,342	2,171	-
New heat pumps	1,462	1,740	1,979	2,547	3,762	4,438	4,179	2,736	-
<b>Total</b>	<b>337,650</b>	<b>333,775</b>	<b>329,394</b>	<b>322,383</b>	<b>308,448</b>	<b>290,730</b>	<b>269,915</b>	<b>246,833</b>	<b>220,295</b>
<b>Pct reduced:</b>	<b>3.5%</b>	<b>4.6%</b>	<b>5.9%</b>	<b>7.9%</b>	<b>11.9%</b>	<b>16.9%</b>	<b>22.9%</b>	<b>29.5%</b> 	<b>36.0%</b>

<sup>4</sup> From the California Department of Finance

Project Name	Electric	Gas	Not known	Grand Total
Electric to electric 30 gallons	2			2
Electric to electric 52 gallons	3			3
Gas - 65 gallon to Electric. Solar assisted- 065 gallon	1			1
100 gallon to tankless			1	1
20 gallons			1	1
30 gallons			56	56
38 gallons			1	1
40 gallon			1	1
40 gallon electric	1			1
40 gallon Gas to 52 gallon electric			1	1
40 gallons			605	605
40 gallons Electric to Electric			1	1
40 gallons Gas to 52 gallons electric			2	2
40 gallons gas to 52 gallons gas			1	1
40 gallons Gas to electric tankless			1	1
40 gallons gas to tankless			2	2
40 gallons to tankless			7	7
40 gallons x 2			1	1
50 Gallon electric to electric	1			1
50 gallon gas to Heat pump	2			2
50 gallon gas to tankless			1	1
50 gallons			351	351

Category	Type	Project Name	Total
HVAC	Commercial	Heat pump	1
		Package unit	1
		Wall furnace	1
Commercial Total			3
Residential		Condenser coil only	183
		Ducts only	100
		Furnace only	142
		Ground mount	77
		Heat pump	2
		HVAC C/O	555
		Mini split	73
		Package unit	22
		Roof mount	422
		Split system	1720
		Wall furnace	8
		Whole House Fan	8
		(blank)	2
		Residential Total	

**Figure 1: 2018 City of Sacramento HVAC and Water Heater Permit Extracts, Showing Level of Available Detail for Report Tracking**

**Environmental Justice**

We support the Council-directed advisory committee’s framework for environmental justice in implementing electrification of existing buildings. Lower-income City households would benefit most from the bill savings attributable to electric equipment. Moreover at least half of City households are renters<sup>5</sup>. This would dictate an approach that leverages the City’s unique Rental Inspection Services to educate landlords about the advantages and eventual requirements to electrify. The City should also launch additional educational efforts focusing on landlords, apartment house owners and low-income energy assistance providers such as Community Resource Project.

<sup>5</sup> The 2017 American Community Survey indicated that 51.4% of City householders lived in rental housing.



## ***Measure E-4 – Increase the amount of electricity produced from local resources and work with SMUD to install additional local storage by 2030***

### **Provide more detail on solar and battery support**

Measures E 4.1 through 4.3 are a vague cluster of recommendations in support of local solar and storage systems that demand more detail on how the City specifically will be working with SMUD. For its part, in June SMUD launched “My Energy Optimizer”, a [pilot program](#) that provides incentives for combined solar and battery storage at customer sites. At minimum, the City could be surveying its own buildings and land for adding solar and batteries to participate in this program. And they could develop streamlined permitting and incentives to assist City households that want to participate.

### **Develop a detailed plan for 1 MW solar project**

Measure E-4 recommends City involvement in a 1 MW community solar project with SMUD. This would be a front-of-the meter installation where the generated output would be sold directly to SMUD. Given SMUD’s long opposition to community solar, this could be a significant precedent, depending upon the structure of the agreement. The E-4 wording suggest that the City could simply be providing a site for a SMUD developed photovoltaic project, with the energy credits provided directly to the City.

### **Consider assisting true community solar projects**

We recommend that the City also consider helping to develop a true Community Solar project working with non-profit developers, such as Grid Alternative or the Community Resource Project (CRP). Such projects have an ***environmental justice (EJ) focus*** since the solar credits can be allocated to low-income renters for example. CRP, for example, has been attempting unsuccessfully for years to have SMUD support a 5 MW community solar proposal for the Franklin Boulevard area.

In non-SMUD areas, the utilities are required by law (SB 43) and CPUC regulation to allow non-utility developers build up to 20 MW community solar projects, with quotas allocated throughout the state. The City of Davis, which helped initiate the original law, has been granted 20 MW for community solar and has entered into lease agreements to begin developing. Moreover, the utilities have a required EJ allocation; PG&E, for example, must set aside 45 MW in its service territory for EJ community solar (see Figure 2).

## II. Solicitation Target

PG&E is seeking to procure 176.15 MW in the Unreserved and EJ categories per [D. 21-12-036](#). The table below shows a break down of the remaining megawatts for each category. :

**Table 2: GTSR Program and Project Capacity Limits**

Category	Capacity Allocation (MW)	Remaining Capacity (MW)	Target for Spring 2022 Solar Choice RFO (MW)
Unreserved	207	152.6	Up to 152.6
EJ Reservation	45	43	Up to 43
City of Davis	20	20	0
<b>Total</b>	<b>272</b>	<b>215.6</b>	<b>176.15 between Unreserved and EJ</b>

**Figure 2. PG&E's Allocated Community Solar Requirements**

***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 Measure TR-3.1: Amend city building code to require more EV charging capacity***

### **TR-3.1**

The measure in the current CAAP is the same as the one adopted in 2021, and is weaker than what will soon be required at the State level. To amend this ordinance, the City should adopt stronger EV charger requirements which would include having every unit in multi-family residential have access to charging, some at Level 1 (access to regular 110 V outlets) with a percentage, available to all residents, at Level 2. This effort should be done in concert with the rest of the NBE requirements which start in 2023.

# Built Environmental Review

## ***Measures E-1 through E-5***

This preliminary draft does not contain sufficient information to understand how built environment measures will actually be undertaken, how they will be coordinated with SMUD and other partners, and how progress will be measured and reported. As such, the following comments include suggestions for the actual draft document expected in the fall/winter timeframe.

**A very serious problem still not addressed is that the City's climate office has been understaffed and underfunded.** The City is two years behind schedule and has not provided a Draft Climate Action and Adaptation Plan. The forthcoming Draft document **absolutely needs to be accompanied by a detailed assessment of the staffing and budget requirements and a detailed funding proposal to accomplish each Measure, including each specific task as a subset of each Measure.**

## **Specific Comments on Measures:**

### ***Measure E-1: Support SMUD as it implements the 2030 zero carbon plan***

Actions taken by SMUD account for virtually 50 percent of the carbon reductions accounted for in the City's plan. The text of Measure E-1 says the city will support SMUD in the implementation of the 2030 Zero Carbon Plan but does not say how. In fact, the City, County, Air Quality Management District, SACOG, and SMUD have been coordinating efforts to electrify the built environment and implement Measures E-2 through E-5. **A consolidated summary of the tasks, schedule, budget, and funding plan of these entities should be part of Measure E-1 to establish the role of the City's Built Environment efforts in the partnership.** All five entities need to be supporting each other.

**Measure E-1 needs to clarify these "supportive" actions to give meaning to the plan.** The success of electrifying the built environment and achieving the 90% infill growth consistent with the Sustainable Communities Strategy depends on this coordination being clearly stated and trackable.

Measure E-1 should provide a schedule of the City efforts (E-2, E-3, E-4, E-5) alongside SMUD's Carbon Zero implementation schedule to show how the City will support SMUD in real time to clarify coordination of actions, reduce delays to both City and SMUD efforts, and make progress accountable. The City's schedule should also note the actions of the County, SACOG, and the AQMD as partners.

The statement from page 84, "While this measure provides a significant GHG reduction in 2030, the impacts decrease towards zero by 2045 due to implementation of the California Renewable Portfolio Standard and SB 100." is confusing. Text from Appendix C discussing Measure E-2

quantification is also confusing. GHG reductions by measure is, by nature, complicated. The City should revise this important section, perhaps with graphics as needed, to clarify the GHG reduction between the actions of the City and SMUD and relevant contributions by other partners.

It is important to make the point that efforts to electrify the built environment are only as valuable as the degree of success and pace at which SMUD removes GHGs from the electricity supply. Should their progress fall below plan, **extra efforts will certainly need to be taken by both the City and SMUD**. Similarly, it is important to note that the success of the City to secure the many climate benefits of infill growth from Measure E-5 is dependent on the City's ability to maintain consistency with the regional Sustainable Communities Strategy and direct development inward.

### ***Measure E-2: Eliminate natural gas in new construction***

Does measure E-2 apply to all residential, commercial, and industrial new construction? Are there exceptions?

How will Measure E-2 be enforced? The city should coordinate its permitting program with SMUD to enforce efficiency minimums for all appliances, especially HVAC and water heating, to be permitted for installation and update these minimums yearly to capture technical advancement.

Action items should be added for implementation, utility coordination, and enforcement.

Performance indicators are needed to track how the City GHG reduction projections included in this report match with outcomes over time. For example, square feet of new construction by category over time and actual GHGs averted, matched against adopted goals that get the city to its expected GHG reductions by 2030 and 2045.

Performance indicators also should track evolving efficiency of installed HVAC, water heating, cooking, and other units by number of square feet, gallon, therms averted, and number of units over time to capture actual improved GHG reductions.

What does this mean – “to fully implement measure E-2, the city will conduct relevant community notification efforts prior to effectiveness in 2023, as required by the State?”

### ***Measure E-3: Transition natural gas in existing buildings to carbon-free electricity by 2045***

Measure E-3 states that electrification of existing buildings is expected to occur incrementally after Phase 2 policy is adopted in 2026 as old gas appliances wear out and need to be replaced. If HVAC and water heating appliances last 10 – 20 years, sometimes longer, then this incremental “as needed” approach to replacement means that very many existing gas units will be operating well into 2040 and longer. Toward the end of life these units typically are even less efficient (dirtier and more expensive to operate) than when they were installed.

The sooner GHGs are averted, the greater the climate benefit. Even if SMUD achieves total electrification of their system, until equipment is replaced, benefits are not accrued. To speed replacement of natural gas equipment:

- The time has come for the City to adopt permitting requirements that require the replacement of gas units more than 10 years old or below a set efficiency level at time of sale or remodel.
- Require sellers of homes and commercial buildings to provide potential buyers with a statement of the fuel type, age, and efficiency of existing HVAC and water heating equipment, average annual cost to run existing equipment compared to current high-efficiency similar sized electrical options, and a summary of the city's requirement to replace with electric after set year.
- Develop an incentive for surrendering gas HVAC and water heating appliances and incentives for buildings that completely turn off natural gas service.

Electrification benefits will be multiplied by enhanced building efficiency in all structures. **Early and aggressive emphasis on Measure E-3.3 is time and money well spent.** The city should consider working with entire neighborhoods or sections of a neighborhood to run a coordinated energy efficiency and electrification program, upgrading multiple buildings simultaneously. It can be used to educate the city-wide public about the benefits of electrification, speed implementation and cut costs if economies of scale are accessed.

In addition to efforts to promote and educate the public about building electrification, **the City should create a youth education, job training, and installation program - a local Climate Conservation Corps - to bring electrification to homes and businesses.** This is a triple win – **youth employment in jobs for the future, healthier more comfortable homes, and progress toward GHG goals.**

Performance indicators can be improved and will help the public understand how this plan will be used to accomplish GHG reduction goals. Consider tracking the number of square feet of conditioned space, gallons of water, therms averted, and number of units (induction) installed by type of structure and area of city, per month, and level of efficiency. Track efficiency improvements and compare to technical best standards. This will allow the City to track how implementation is pacing with goal attainment and also could show the city where implementation is working best and where there are slowdowns or issues. Tracking youth employment hours or trade certifications achieved could be very good news.

What coordination and funding options exist to support the difficult task of electrifying existing buildings more completely and faster? Who are the partners the City can work with beyond SMUD? Improving the details in Measure E-1 as suggested will help in all other Measures.

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

Measure E-4 will benefit from the detailed, consolidated summary of the tasks, schedule, budget, and funding plan of the City with County, AQMD, and SMUD as discussed in these comments as part of Measure E-1. As is, this discussion, as the rest of the Preliminary Draft, shows intentions to “support” SMUD but does not deliver any specific actions on the part of the City.

- Key Performance Indicators. Who will pilot the local renewable energy project – City or SMUD?
- E-4.1 Way too general. How will the City support this?
- E-4.2: Can this be more specific?
- E-4.3: Says that incentives have been created. What are they? When will they be on offer?
- E-4.4: Pilot completed? When? What? Where?

***Measure E-5: Support Infill Growth with the goal that 90% of new Growth is in the Established and Center/Corridor Communities and 90% Small-lot and Attached Homes by 2040, Consistent with the Regional Sustainable Communities Strategy. Project-level VMT Should be 15% Below (or 85% of) the Regional Average***

Measure E-5 directs the City to take more and larger steps to robustly direct new growth into the infill locations. This Measure will reduce building electrical demand per capita and support attainment of climate goals. This Measure also has the co-benefits of conserving water, farmland, and open space, all actions which also contribute to reducing GHGs. Additionally, this Measure will reduce the cost of extending and maintaining electrical infrastructure, supporting SMUD and contributing to the successful attainment of Building Electrification efforts. These are long-term benefits that, along with reducing climate impacts, improve public health and safety and boost critically needed affordable housing and mobility.

To succeed in Measure E-5, the City will need to work closely with SACOG, SMUD and housing partners to develop and enforce the required infill growth measures. Equally important is the need to work with partners to **defeat proposals to “loosen” land use and transportation regulations that would allow future sprawl.**

# Built Environment Review

## *Measure E-5 only*

### General Comments:

- We would like to see a measure effectively eliminating lane addition projects. It might also include working with regional leaders to prevent further freeway expansion projects.
- Except Measure E-5 (infill), there are no connecting land-use guidelines. Imbalanced emphasis on removal of natural gas and grid electrification/renewable.

### Specific Comments on Measures:

*Measure E-5: Support Infill Growth with the goal that 90% of new Growth is in the Established and Center/Corridor Communities and 90% Small-lot and Attached Homes by 2040, Consistent with the Regional Sustainable Communities Strategy. Project-level VMT Should be 15% Below (or 85% of) the Regional Average*

#### **Measure E-5.3**

We appreciate that this measure mentions anti-displacement policies and programs, but without more detail, this does not inspire confidence. This language should commit the City to work with local advocates, affordable housing developers, and community-based organizations to build out and enact anti-displacement policies and programs. The community must be involved in deciding what anti-displacement measures will be effective.

#### **Measure E-5.4**

We would like to see explicit program expansion/incentives for the public to take advantage of elimination of single-family zoning and seek duplex-quadplex alterations.

# Transportation Review

## *Active Transportation Focus (TR-1)*

### **General Comments:**

To prioritize AT infrastructure at the top of the transportation pyramid as shown in the MCCC, road characteristics and policies need to change in tandem. Policy needs to back those changes and funding must be tied to it. This plan shows no systemic planning or holistic approach to implementation. It is piecemeal, primarily based on grant funding, which is known to be a long drawn-out process which takes years for implementation, which is already too late!

### **Specific Comments on Measures:**

#### *Measure TR-1: Improve Active Transportation Infrastructure to Achieve 6% Active Transportation Mode Share by 2030 and 12% by 2045*

1. The performance indicators are minimal – mode share targets are too low. They should at the very least match the MCCC.
  - a. Modeshare was at 2% in 2016 and the CAAP’s targets are shooting for 6% by 2030 and 12% by 2045? Too low.
  - b. MCCC: 2020 – 30% & by 2045 – 40%
  - c. Austin & other European cities are examples of changing mode share. These are described in the appendix, yet the City doesn’t view them as viable for Sacramento.
2. There is no mention of updating either Master Plan - the Bicycle Master Plan or the Pedestrian Master Plan. Both are outdated and need to reflect equity, pandemic and climate changes.
  - a. 2006 pedestrian plan should link to the outmoded Bike Master Plan. A new plan to accommodate all of the various devices should be done and quickly.
3. Need more specificity on infrastructure needs - speed reduction, roadway design and re-design with Vision Zero and Complete streets requirements. For successful mode share to happen, the streets must be safe for all users.
4. There is no mention of e-bikes, e-bike infrastructure - charging, or incentives for citizens and small businesses. This is a missed opportunity.
5. There is no mention of the intersection with other existing plans the city has in play: The Transportation Priority Plan nor Public Works’ Seven Big Ideas to reduce GHG.



6. Providing below market rate on parking throughout the city, which increases motor vehicle use, must be changed. Rezone parking. Stop requiring parking spaces for every apartment, office, store, restaurant. Eliminate parking spaces and replace them with protected bike lanes throughout the city. Require ample parking spaces for bicycles.
7. There is no mention of piloting new practices or learning best practices from other cities, nor learning from small pilots and then making them a better choice for community members. Slow and Active Streets was a poorly planned and executed pilot project, and instead of learning from, then addressing changes to make it more successful, it was swept to a corner, and seen as a failure.

# Transportation Review

## *Active Transportation Focus (TR-1)*

### General Comments:

- How will the Transportation Priorities Plan, 7 Big Ideas, and other active transportation plans play a role within the CAAP? The CAAP should set active transportation and transit targets that **match or surpass** those within the MCCC.
- Include an action around ongoing maintenance of bicycle and pedestrian facilities
- Increase "support" for all active transportation actions. This vital work should not be left to just a few staff within Public Works - Transportation. The creation of a dedicated Division and increased staffing would help implement these actions much sooner.
- Please change the photo on pg.98. We should have a visionary photo of what we want active transportation in our City to look like, bike lockers are not that.

### Specific Comments on Measures:

#### *Measure TR-1: Improve Active Transportation Infrastructure to Achieve 6% Active Transportation Mode Share by 2030 and 12% by 2045*

##### TR-1.1

Increase the lane miles of separated bikeways. If we want to truly provide all ages and abilities facilities we can't continue to build bikeways that put our most vulnerable users at risk. As written the City is only proposing 18 new miles of separated bikeways.

##### TR-1.3

Many studies have already been done within existing plans that identify barriers. What is the City hoping to learn that we haven't already heard from the community?

##### TR-1.4

What exactly is meant by "incentivize a spectrum of transportation options"? The City should pursue a Universal Basic Mobility Pilot similar to what is currently underway in Oakland.

##### TR-1.5

The City is very reliant on grants for almost all of its active transportation projects. Outside of securing money for programs, the City Manager, Mayor and Council should allocate more money on a yearly basis to fund active transportation projects.

# Transportation Review

## *Transit Focus (Measure E-5 and TR-2)*

### **General Comments:**

The plan acknowledges that 57% of our GHG emissions are from transportation, but then proceeds to focus on other issues, and to set very low goals and actions for addressing transportation. The plan sets a transit goal of 11%, one-fifth of that in the Mayors Climate Change Commission (MCCC) recommendations. And it sets an active transportation goal of 12%, less than one-third of the MCCC.

The transportation strategies (page 66) are:

- Significantly increase the portion of trips completed via active transportation options like walking and biking,
- Transition the majority of remaining trips to public transit and carpools, and finally to
- Transition any remaining passenger and commercial vehicle trips to EVs.

Yet the measures in the document seem focused on keeping the ‘remaining vehicle trips’ and de-emphasizing active transportation and transit, resulting in a city that remains dominated by motor vehicles.

More important than what the city says it will do or might do in the CAAP, is that it does not say it will stop doing. We have a highly carbon-intensive city and transportation directly due to decisions that city has made in the past. It must acknowledge these mistakes before it can move forward into a carbon-free future.

- The city must stop investing in expanding motor vehicle capacity, through adding lanes, freeways, and interchanges. The plan should establish a moratorium, through 2045, on capacity expansion.
- The city must actively reduce VMT, through roadway capacity reductions, charging for all parking in the entire city, reducing over time the quantity of parking, and returning some parking income to the neighborhoods.
- The city must cease its unofficial policy of only doing transportation improvement projects through state and federal grants. It must spend some of its own funds on supporting safe active transportation and transit.

- The city must take strong action towards reforming zoning to allow housing everywhere, and must reform development guidelines that prevent multi-family housing in many locations. Indications are that the general plan will make progress in this area. The city's policy of preventing or slowing a variety of housing types is in large part responsible for our sprawling built environment and carbon-intensive transportation system.

## **Specific Comments on Measures:**

***Measure E-5: Support Infill Growth with the goal that 90% of new Growth is in the Established and Center/Corridor Communities and 90% Small-lot and Attached Homes by 2040, Consistent with the Regional Sustainable Communities Strategy. Project-level VMT Should be 15% Below (or 85% of) the Regional Average***

Support Infill Growth is really about creating land use that supports a compact, efficient transportation system. As such, it should be included with Mobility rather than Built Environment, which is about energy and buildings, or in its own Housing section. The Mobility or transportation section should be at the top of the document.

***Measure TR-2: Support Public Transit Improvements to Achieve 11% Public Transit Mode Share by 2030 and Maintain Through 2045***

### **TR-2.1**

Update and implement the City's Transportation System Management Plan (TSMP)... This section is so vague that it must be assumed that the city wants to continue its ineffective transportation demand management (TDM) activities. There is no mention of using congestion pricing, or even evaluating congestion pricing, until a single mention in the appendices. Congestion pricing could be a critical source of funding for transit and active transportation, but the city seems to have discarded this idea before even starting.

### **TR-2.2**

Eliminating parking minimums is a great idea, but there is nothing to indicate that the city intends to manage parking to reduce vehicle miles traveled (VMT), to charge market rate fees for all parking citywide, and to return parking income to the neighborhoods for transportation and livability improvements. Charging market rates for parking, after that necessary to pay for parking lane and structure maintenance, could also provide significant funds for transit.

### **TR-2.4**

Collaborate with SacRT in planning and implementing increased transit services... The word "collaborate" is meaningless without specific actions. It is hard to speculate what this means, but it does clearly absolve the city of any commitments.

### **TR-2.7**

The bike share program should be an integral part of the transit system, but the city is depending on the good will of private providers, which has failed in the past. The city should at least be studying a publicly owned and/or publicly controlled bike share system. Bike share is the best option for providing first mile/last mile transportation to transit. The city must ensure that it is available continuously and in an equitable manner.

### **TR-2.13**

Investigate and lobby for the development of a TNC user tax. Ride-hailing has decreased and will probably further decrease as the TNCs reduce their subsidy. Not sure why this is even here. It is well known that ride-hail directly reduces transit use, so it should be regulated.

## **Transportation Review**

### ***Measures TR-1, TR-2, TR-3***

#### **Specific Comments on Measures:**

#### ***Measure TR-1: Improve Active Transportation Infrastructure to Achieve 6% Active Transportation Mode Share by 2030 and 12% by 2045***

This measure:

- Does not include accessibility language such as “rolling” or “mobility device”. However does acknowledge Mayor’s Commission on Climate Change Report use of “rolling”
- Strongly relies on 2016 BMP and 2006 PMP to achieve targets and doesn’t mention how TPP might impact 2016 and 2006 BMP
- Only mentions bikeway and sidewalk improvements as infrastructure needs; lacks specificity on actual improvements needed like roadway design, speed reduction, lighting (safety and signals).
- Doesn’t make a clear connection between active transportation and the existing built environment and the barriers it poses. Included in the actions are the intent to build out AT networks, but placing new infrastructure does little without addressing the auto-centric characteristics of arterial roads that make them unsafe and unpleasant for people to use (e.g. high vehicle speeds, lack of shade, etc). This is especially relevant in low-income and environmental justice communities where the built environment tends to be a lot less safe. The actions in TR-1 do mention “low-stress” pedestrian and bike networks which implies an understanding of this relationship, but it would be beneficial to include language that makes an explicit connection between remediation of existing

road conditions and the success of AT infrastructure – in other words, AT infrastructure actually being used. To truly prioritize active transportation at the top of the transportation hierarchy, road characteristics need to change and policy needs to back those changes.

- Does not mention City Code Adjustments to parking ratios, standards, etc., or programming actions.

**Positives:**

- Acknowledgement of means for prioritization of infrastructure investment in historically marginalized communities via Actions TR-1.2, 1.4 and 1.5 (p. 99)
- Fairly ambitious strategy if the City can follow through

**Issues/Areas of Improvement:**

- **TR-1.3** is overly broad and simplified. This study should begin in communities with lowest rates of AT use/EJ communities.
- Would like to see City E-bike subsidy programs and specific code requirements for new development or qualifying business renovations.
- **TR-1.1:** BMP 2016, even with the 2018 update, is out of date and should not be the foundation for improvement. This leans too heavily on existing documents, both of which were completed pre-pandemic.

***Measure TR-2: Support Public Transit Improvements to Achieve 11% Public Transit Mode Share by 2030 and Maintain Through 2045***

There is no connection between TR 2.6 (electric car share expansion) and 2.7 (shared micromobility) and transit. The City needs to include language to emphasize these at transit stops to support the first/last mile.

**Positives:**

- TR-13 of a TNC tax is a great addition. Use this in conjunction with developer fees for VMT inducing projects to support transportation infrastructure and programming costs.

**Issues/Areas of Improvement:**

- This measure mentions several methods by which the City will work collaboratively with SacRT to advance public transit, including public transit lanes and signal timing equipment. Might be beneficial to mention how the City can support during the development review process – in new developments, conditioning developers to provide easements for RT infrastructure such as bus stop pads, etc.
- **TR-2.3** - It might be beneficial to incorporate into one of the actions something about City/SacRT collaboration to identify areas of high transit need (current transit deserts)

through community engagement in existing land use planning efforts. This could be included in TR-2.3 by specifying that “priority corridors” includes transit deserts.

- **TR-2.10:** Remove barriers to access transit stops and stations (provide low-stress connectivity) - does not explicitly state “Close first-mile last-mile gaps”. This should be specified.
- **TR-2.10** should include a strategy for acquiring funding for this work, and explicitly state that the City will work with SacRT to secure funding for bus stop and transit stop improvements.

***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***

We agree with the City that remaining/all VMT should be ZEV. However, it should be just that - “remaining” - after AT and transit have been prioritized.

**Positives:**

- **TR-3.1** – We are pleased to see that City Code will be amended to require 20% EV-capable charging spaces and at least one Level II charger in new multifamily developments. A lack of accessible EV chargers is just one, but a fundamental, barrier to low-income families adopting electric or plug-in hybrid vehicles. Requiring charging at apartment buildings can help make EV deployment more equitable. However, requiring only one Level II charger seems like a weak policy.

**Issues/Areas of Improvement**

- **TR-3.5** - This action states that e-mobility hubs will be projects with “special consideration for proximity to low-income/disadvantaged communities and multifamily housing.”. This should say e-mobility hubs will be prioritized in low-income/DACs and multifamily housing, consistent with Mobility Recommendation #2 from the MCCC.

**Other Comments:**

- TDM strategies (or housed under different program) should explore citywide VMT pricing for transportation funding rather than gas tax. A 30% ZEV rate is a 30% reduction in the gas tax funding for transportation projects. ZEVs would exact the same wear and tear on the road and potentially more if drivers are no longer inhibited to travel due to gas prices.

# Waste Review

## *Measure W-1*

### **General Comments:**

- The only major goal of the Waste section is complying with a state-mandated goal to reduce organic waste sent to California landfills. The city suggests it will hit SB 1383's statewide 75% organic waste reduction goal by 2025, simply by implementing the required components of the regulations. Few details are offered on how Sacramento has met the components of the regulations required to be in place by Jan 1, 2022 or their plans to implement other requirements.
- Sadly, the city does not propose to increase diversion of organic waste or in any way try to increase food diversion past 75% in 2025 (when they presumptuously hit their 75% target). There are no new goals or benchmarks in place after meeting this 2025 goal.
- There are very few details on enforcing SB 1383 and other state-mandated waste reduction programs.
- All other waste streams are completely ignored. The CAAP has no measures to reduce waste, divert material from being landfilled, or transition to a circular economy. While the national and state government is increasingly focused on the reduction of plastic (derived from fossil fuels) and a zero waste future, the City has no such goals.
- The words "plastic", "zero waste, and "circular economy" don't appear once in this CAAP draft.
- This CAP does not mention any of the following necessary and bold measures that are found in other California CAPs:
  - Reduce landfill diversion rate to 95% by 2035;
  - Reduce single-use plastic foodware through city ordinances;
  - Ban polystyrene;
  - Implement zero waste policy for city events;
  - Launch source reduction awareness campaigns;
  - Programs/incentives to promote refillable and reusables at local businesses and restaurants;
  - Deconstruction ordinances to reduce landfilling of construction & demolition material;
  - Support extended producer responsibility legislation at the state and national level; and
  - Increase proportion of waste products and recyclables productively reused and/or repurposed



### ***Mayor's Commission on Climate Change Recommendations:***

- It's mentioned in introductory comments that the CAAP will not directly address MCCC's recommendation on food sourcing (25% within 200-mile radius by 2030 and 40% by 2045) because the City has "limited jurisdiction over food system sourcing". The City ignores all but one of the many MCCC recommendations on actions to improve and strengthen local food systems.
- The successful execution of Measure W-1 would exceed the goal by locally meeting the state's 75% organic waste reduction by 2025 target through SB 1383 implementation, while the MCCC calls for a 75% reduction by 2030.
- The CAAP needs to include the MCCC's recommendations on expanding communitywide composting initiatives, community food hubs, or expanding/promoting urban agriculture ordinances. Outside of offering some educational classes, this CAAP exclusively promotes meeting our organic waste reduction goals through technology and contracts with the waste industry, while ignoring local community solutions.

### ***Equity:***

- There is tremendous potential for creating local jobs that have low-barrier to entry from measures like increasing local recycling of organics, expanding and supporting infrastructure for repair and reuse, and expanding the sharing economy. The city does not have any waste measures that seem to directly support job creation.
- There seems to be little consideration of the potential benefits of promoting local and neighborhood-level measures over industrial scale solutions.
- A missing performance indicator is the number of repair, resale and sharing facilities and businesses.

## **Specific Comments on Measures:**

### ***Measure W-1: Work to Reduce Organic Waste Disposal 75% Below 2014 Levels by 2025***

#### **W-1.1**

- List of state-mandated requirements with no information on: 1) what the city has done to comply with implementation dates that have already passed and 2) details on implementation to meet 1383's 2025 requirements.

#### **W-1.2**

- Extremely vague action, "assess the feasibility", with no timeline for producing feasibility assessment.
- Feasibility assessment and recommendations/plan have no greenhouse gas emissions savings, should this be considered a CAAP measure?
- City missing an opportunity to promote, incentivize and expand community composting. There are existing businesses in Sacramento that the city could support (ReSoil Sac, GRAS) and a multitude of national and state initiatives to promote community

composting that the City could explore (Institute for Local Self-Reliance, CalRecycle's Community Composting grants, etc.).

**W-1.3**

- Unknown impact of current backyard compost education events, as number of events conducted is a poor metric. City should, at a minimum, add "number of event attendees" as a performance indicator.

**W-1.4**

- This action seems to already be covered by W 1.1, which pertains to all organic waste. This action has already been implemented (late – July 2022 instead of January 2022).
- The action should include planning and implementing a food waste diversion program for multi-family residential customers.

**W-1.6**

- City should have a more prominent role than "regional partner" in the development of an edible food recovery program.

**W-1.7**

- This action is vague, and it is unclear what "waste stream" is being referred to.
- No timeline for this feasibility assessment is given.
- City's franchise haulers are not mentioned as private sector partners in this feasibility assessment, nor are local organic recycling/community composting businesses.
- Feasibility assessment and recommendations/plan have no greenhouse gas emissions savings, should this be considered a CAAP measure?

**W-1.8**

- Wording of action is unclear and misleading. Restaurants do not need front-of-house composting but organic waste containers available to customers.
- "Considering" adoption of an ordinance has no greenhouse gas emissions savings. This should not be included as a CAAP measure as is, without actions that directly support increasing diversion of organic waste from the commercial sector.

# Water & Wastewater Review

## *Including WW-1 and MM-5*

### **Water Resources in our Region:**

#### *Chapter 01. Introduction*

This chapter presents a general discussion of the potential impacts of climate change including the climate's impact on the region's water resources. The document's general tone indicates that climate change may have significant negative impacts on the City but does not put those impacts in terms the public can understand. Specifically, with regard to water resources, what are the specific consequences to the City and its residents when extended droughts impact regional water supplies and what is the impact on the lower American River? The document does not establish a need for action or alarm because the public is left with the impression that State standards and actions by others will cause the City to meet its goals with respect to its water needs. It is unlikely the public, or for that matter the local water agencies, will be persuaded to take the actions suggested later in the Plan unless the document makes a compelling argument for those actions. We suggest that the document serve to motivate the citizenry to take immediate actions on their own with strongly recommended actions.

For example, the Introduction includes a brief narrative of climate change implications for the region's water supplies without explaining their implications for individual City residents. However, later in the document the statement is made that groundwater is being managed sustainably. This statement, along with statements relying on the State's efforts to continue to develop water efficiency standards seems to lead the City and its citizens to believe there is no pressing concern for the sustainability and reliability of the region's water supplies. We submit that the region's water future is likely to be much more precarious than the Plan indicates.

Regarding the region's groundwater, the Groundwater Sustainability Agencies (GSA) responsible for the North American, South American, and Cosumnes Subbasins developed their Groundwater Sustainability Plans (GSP) using modest climate change impact assessments. Even with these assessments two of the three regional Subbasins are marginally sustainable over the next twenty years while the Cosumnes is already undergoing groundwater management actions and projects to deal with chronic over drafting. However, current climate scientist assessments indicate that a Hot Dry assessment for our region is far more likely to occur than the more modest assessment used by the GSAs when developing their GSPs. We believe this means the region's ability to draw from groundwater to replace reduced surface water in dry years may not be as reliable as the current GSP projections indicate and that efforts to reduce demand now will help the basins retain groundwater needed later during the predicted hot and dry weather increasingly experienced in the region.

The region's surface water rights, the full appropriations water purveyors depend on, are no less guaranteed. While we may be able to rely on minimal water allocations for public health and safety during hot dry periods, these allocations may not be sufficient to maintain the tree canopy areas the CAP relies upon for future carbon sequestration. These allocations likely won't be sufficient to maintain the landscaping within the City made up of turf grass, and non-native plants, shrubs, and trees that are not appropriate for our region's climate. While the State and City landscape standards may lead to appropriate landscaping for new construction, they do not directly address the thousands of homes and businesses that maintain landscaping not appropriate for our region. This leaves the City's existing residents to suffer a cycle of bust/boom/bust landscaping – brown lawns and shrubs during increasing droughts and heat storms interspersed by reinvestments in re-green landscaping during wetter periods.

The region's Water Forum is conducting a technical analysis that is attempting to assess how various climate scenarios, including a Hot Dry climate assessment, impact the region's surface and groundwater resources. This analysis is attempting to integrate both current climate modeling and the assumptions for water management utilized by the Bureau of Reclamation and other water managers, to understand how climate change will impact our region's water supply reliability and sustainability for the future. We recommend the City consider this analysis in its determination and explanation of the vulnerability of the region' and City's water supplies. The analysis is expected to be available later this year.

## **Specific Comments for Plan Improvement (outside of and within Water Section):**

### ***City-wide Climate Adaptation Program (Program) to Promote Durable, Biodiverse, Water Conserving Habitat Through the replacement of Ornamental Turf/High Water Use Landscaping With Local Native Plants***

This initiative is a Citywide effort involving all City departments, ECOS, Habitat 2020, other community organizations, the Regional Water Authority (RWA), the Water Forum, and other associated water agencies. The Program joins together the efforts and resources of all these groups and organizations to achieve meaningful climate adaptation through landscape conversion in our region. The City's leadership and support of this effort can be instrumental in building the momentum necessary for a regional effort that can engage other community-based organizations, local governments, and water purveyors.

A City led, regionally based program may increase the availability of state financial support. In a recent briefing sponsored by the RWA for local water purveyor officials, the Chairman of the State Water Resources Control Board, Joaquin Esquivel, stated, among other topics, that water conservation is critical to the state's ability to adapt to a changing climate. He went on to say that as far as municipal, commercial, and industrial water use is concerned, outdoor landscaping poses the big target of opportunity, and that replacement of ornamental turf grass

and other water demanding, climate inappropriate landscaping with local, low water use, native plants is the direction the state should pursue. He recognized both the water savings and the biodiversity inherent in this habitat change and invited participants to propose programs that the state can help support to make this type of conversion.

The following description provides ideas for the Program's scope and breadth. These are not new concepts, and many can be found in sections of the Plan. Our recommendation is that the City pull them together into a City wide program that has resources, staffing and a single purpose to accomplish this critical climate adaptation. We believe it will require a concerted effort to achieve the Program's objectives in a timely fashion for current City residents, before an ongoing or next drought cycle further erodes the beauty and the health of the city and the biodiversity of our region.

Program elements include:

1. Community education: RWA PSAs, a 'how to' web site coordinated with CNPS (info on designs, plant selection and how to do it info); participating Water Agency (WA) outreach (bill stuffers, community meetings, demo garden demonstrations); Sac Bee and possible local TV station commitment; CNPS garden portfolio (virtual tours of area low water use, native plant gardens with plant lists); Community NGOs using their voices to call for habitat adaptation including turf replacement; and emphasis on the program at community and environmental events including Earth Day. Information for home purchasers on choosing water wise landscaping. Request for state funding for communication strategies and materials that can be used across the state.
2. RDW/WA customer information/financial assistance programs targeted to encourage climate adaptive landscaping including the replacement of turf and high water use landscaping with local native plants. Programs will be offered to the wide array of property owners including individual homeowners, commercial property owners, HOA's and rental property owners, and property managers. Programs will also be developed to assist local governments efforts to relandscape local facilities, parks and transportation corridors. Requests would be made to supplement local rate payer funds for these programs with State funding.
3. Focused Low-income owner /renter program: State funded program to supplement RWA/participating WAs programs to fund specific climate adaptive landscaping including turf replacement and landscape water efficiency for rental units and low-income homeowners. The intention would be to extend these programs region wide.
4. New Building Industry pledge to install reclaimed water for all outdoor landscaping use, eliminate ornamental turf, utilize low water local native plants in all communal landscaping and any landscaping provided to homeowners by the developer. Request

for state funding to develop developer/realtor information on native plant landscaping benefits.

5. Local government commitments as expressed in Climate Action Plans (CAP) to eliminate ornamental turf, modernize irrigation, replace all high water use landscaping in public facilities, parks, and transportation corridors by 2030. Request for a State funded program to assist in the conversions. CAP required elimination of high water use landscaping and ornamental turf as part of new construction landscaping and any permit required new or retrofit landscape coupled with the requirement for the use of low water use, local native plants in all future landscaping.
6. Focused landscape industry technical training on turf replacement and low water, native plant selection, planting, and maintenance. Request State funding to modify existing tech training/certifications to include this information and training. Technical assistance from CNPS and Master Gardeners to develop this program may be required.
7. Sponsor bilingual incentives, training and certification for home garden contractors who cut grass & blow leaves to instead (1) co-design and maintain low water use local native plants and edible, lower maintenance gardens w/ home owner; (2) construct and maintain low water and water storage systems; (3) create, purchase, and install compost bins (in areas not serviced by local utilities) and systems including use of "lasagna" layered soil development & water retention techniques; and (4) in concert with the Tree Foundation and local nurseries supply native, medicinal & edible planted gardens including shade for the home, and trees based on permaculture techniques that sequester carbon. Request State funding to develop/modify existing tech training/certifications to include this information and training for this group of contractors. A program including financial assistance to allow program participants to become certified should be instituted. Technical assistance from CNPS and Master Gardeners to develop this program may be required.
8. Enhance the availability of the wide range of local native plants to meet program demands. Work with local nurseries and growers to expand local native plant marketing and available offerings. CNPS and other regional purveyors of local native plants can provide technical assistance to nursery/growers who participate in the program. Develop a plant labeling system to tie into the program. Seek state funding to assist in developing the nursery/grower infrastructure needed to support the region's climate adaptation program.

### ***Community Health and Resiliency***

Add a new measure titled Water Efficiency. Include under this measure those items throughout the existing Plan dealing with water use and water efficiency. Add the major new initiative

suggested above to promote durable, biodiverse, water conserving habitat within the City landscape by replacing ornamental turf/high water use landscaping with local native plants.

### ***Urban Greening and Forestry***

In addition to the resources listed in the Plan, the City should consult and work with the State California Native Plant Society's (CNPS) Calscape.org data base of low water use local native plants, the Sac Valley Homegrown Habitat local native plant list, the Sac Tree foundation's Shady 80 tree list, information from the Xerces Society and the Sacramento Audubon Society. These information and technical expertise sources can assist the City in tree selection and other aspects of resilient habitat development. The Sacramento Tree Foundation also maintains a list which is updated regularly grading the carbon sequestering capacity of native and other shade trees that can be used to guide tree selection for public and private plantings.

Tree selection is also important for long term resilience and carbon sequestration. Fast growing trees are not always the best choices for longer term environmental health. In addition, the City should commission a study to assess how to efficiently water the existing and new tree canopy. As water utilities improve leak detection and water conservation programs. Some of the water the tree canopy may have relied upon is reduced. Provisions may need to be made to effectively water the tree canopy in the future when conditions warrant it.

### ***City Buildings***

The City should rapidly carry out a city-wide property landscape irrigation audit that includes the following actions:

1. The identification of all essential and nonessential turf. For essential turf, the audit should focus on improving watering practices. For nonessential turf, a plan and timetable should be developed to phase it out by 2030. Nonessential turf should be replaced with low water, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees.
2. The Audit should also focus on non turf landscaping and identify landscape areas that include water wasting plantings as well as water system efficiency improvements. The water wasting planting areas should be phased out and replaced by 2030 with low water, drought tolerant plants with an emphasis on local native plants and trees. In areas where high water use trees exist, successor plantings of low water use trees should be implemented.
3. All existing tree plantings should be evaluated for watering efficiency in each phase of the audit.
4. All new City building landscaping and any landscape refurbishment should meet a goal of 100% low water use landscaping (except for essential turf grass). The City should make use of local native plants and trees. All City buildings and facilities should include

public information regarding the low water plants being used, how they are planted and cared for, and where additional information regarding sustainable landscaping can be obtained.

5. Actions to increase the use of gray and recycled water as well as rain gardens and other mechanisms to encourage stormwater capture and infiltration should be incorporated into both existing and new City facilities.

### ***Transportation***

The City should make use of low water, native plants and trees in transportation corridor medians and curb areas, other transportation and pedestrian right of way landscaping, and parking landscaping. The County should coordinate with the State California Native Plant Society's Plants for Parkways program for information and technical assistance on appropriate native plant selection, landscape design and planting tips, and plant watering and maintenance tips for this region. In addition, the City should consider working with the Sacramento Valley Chapter of the California Native Plant Society (Sac Valley CNPS), Xerces Society, and the Sacramento Audubon Society to ensure county personnel are trained on how to select, plant, and care for low water use local native plants.

### ***Increasing Green Space and Shade***

For purposes of this and all other recommendations regarding the use of low water, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees, the City should rely on the State California Native Plant Society's (CNPS) Calscape.org database of low water use local native plants, the Sac Valley Homegrown Habitat local native plant list, the Sac Tree foundation's Shady 80 tree list, information from the Xerces Society and the Sacramento Audubon Society. Public awareness of the City's landscaping changes, including the lists of available and appropriate landscape plants and techniques to ensure they thrive, should be incorporated in the City's water efficiency outreach program.

### ***Transportation Strategy***

Rapid Transit and transmission corridors are excellent places to employ low or no water use local native plants, shrubs, and trees. While trees are not welcome around power lines, they are effective in parking areas and as landscape shade where appropriate. Cool and permeable pavement should be used in parking lots and other paved areas where trees are planted in tree wells for shading, such as large parking lots, and extensive pavement surrounding commercial buildings. Tree wells must be adequate to accommodate the necessary root structure for the trees to be planted in these areas.



### ***Waste Strategy***

Methane gas release from old landfills can contribute to greenhouse gas emissions. The City should consider conducting a study of its old landfill sites to ensure that everything is being done to effectively manage and remaining methane production from these sites.

### ***Local Food Planning***

The concepts of community education, tool banks and technical assistance discussed in this initiative can be broadened to assist low-income communities to replace turf lawns and high water use plants with local native plants. This program may also be a hub for financial assistance. Consideration should be given to the expansion of this initiative so that it dovetails with the City-wide climate adaptation program described above that promote durable, biodiverse, water conserving landscaping.

### ***Reporting on Progress***

Publish on the City's web site water use (GPCD) statistics, (available from the California Department of Water Resources and the City Water Utility) for customers monthly water use. Contrast these usage statistics with other comparable jurisdictions within California and sample jurisdictions who have made commitments to the wise use of water. The City's performance in comparison with the Governor's voluntary conservation goal should also be included. This information should enable area residents to gage their own water use in comparison to others in the region and across the state. Information about the City's own water use should also be posted. This information will be useful in determining how successful the City's efforts are in reducing its own as well as its citizens' water demand.

## **Specific Comments on Water & Wastewater Measures:**

### ***Measure WW-1: Reduce Water Utility Emissions (in MT CO<sub>2</sub>e per Million Gallon Delivered) by 100% by 2030 and Maintain that Through 2045***

#### **WW-1**

Add the proposed Program titled City-wide Climate Adaptation Program outlined on page 3 of this letter as a major component of Measure WW-1. The Program promotes durable, biodiverse, water conserving habitat within the City through the replacement of ornamental turf/high water use landscaping with local native plants. In addition to the Co-Benefits listed in WW-1 this Program will add the Co-Benefits of Community Cost Savings and Job Creation.

#### **WW-1.2**

Include within the evaluation the possible impacts this approach may have on Regional San's Harvest Water Project.

**Add WW-1.8**

Add a Citywide initiative involving all City departments, ECOS, Habitat 2020, other community organizations, the Regional Water Authority (RWA), the Water Forum, and other associated water agencies to achieve meaningful climate adaptation through landscape conversion in all aspects of the City's built environment. The Program will promote durable, biodiverse, water conserving habitat within the City through the replacement of ornamental turf/high water use landscaping with local native plants. The Program should be led by the City Planning Department with support from Utilities and Public Works. The Program will reduce the electricity needed to supply landscape water, reduce per capita water use, improve landscape climate resiliency and carbon sequestration, and enhance the area's biodiversity. The City's leadership and support of this effort can be instrumental in building the momentum necessary for a regional effort that can engage other community-based organizations, local governments, and water purveyors

***Municipal Measure MM-5: Reduce emissions from water usage/conveyance and stormwater drainage (in MT of CO<sub>2</sub>e per MG delivered) 100% by 2030***

**MM-5.8**

The City should participate with Sacramento Area Flood Control Agency (SAFCA), State Department of Water Resources, the Bureau of Reclamation, the Sacramento Water Forum (WF), Regional Water Authority (RWA), local water agencies and other interested parties in the development of excess storm water recharge projects including Flood MAR. Activities that should be pursued include:

1. Identifying priority recharge areas within the County, including Paleochannels, and moves to zone such properties for that purpose.
2. Convening discussions with Groundwater Sustainability Agencies, RWA, Sacramento Area Flood Control Authority, Water Forum, conservation landowners, agricultural interests, other municipalities, and others interested in developing and securing multi benefit projects that can be utilized for groundwater recharge in the three groundwater subbasins.
3. The City should consider actively participating in the facilitation of the acquisition (purchase, conservation leases, or other means) of viable projects.
4. The City should become involved in determining when and how some of the excess storm water from future storm events that moves down the Sacramento River can be diverted either out into the bypass or other diversion points for recharge benefits for this region.

## **Carbon Sequestration**

### **All Comments:**

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 CO<sub>2</sub>e). 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 CO<sub>2</sub>e in 1 year. Alternatively, planting 17 new trees removes about 1 MT CO<sub>2</sub>e from the atmosphere over 10 years."

Removing trees likewise adds MT CO<sub>2</sub>e, but this plan fails to account for ongoing loss of tree canopy, resulting increases in MT CO<sub>2</sub>e, 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 is likely to decrease 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, but for reasons stated below and in attachment, success is unlikely without a substantial reform of how the City does Urban Forestry 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 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.

### ***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.

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 costs...." 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."

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 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 what Urban Forestry's performance guidelines are. 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, this will be a paper plan and not a living document.

### ***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 (predecessor 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 Precludes 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. 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. 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.

### ***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, monitor and expand greenspace and permeable surface as the City grows. 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.

## ***Municipal Measure 6***

### **Street Planters**

“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? We think the CAAP should take a more strategic approach to overall urban form and find a way to quantify, monitor and expand greenspace and permeable surface as the City grows.

### **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](#). 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 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?



# Implementation and Monitoring Review

## *Comments on Section 8*

The June 2020 MCCC report made specific recommendations regarding accountability in the implementation of climate action. The City's own auditor made many similar recommendations in its December 2020 "Audit of the City's Green Efforts." The MCCC recommendations as well as those of the auditor deserve the City Council's attention and should be included in the draft along with relevant responsive measures.

### **Specific Comments:**

As proposed, the implementation and monitoring process does not provide for accountability commensurate with the urgent need to address the climate crisis. We recommend the following:

#### *Single Centralized High-Level Point of Accountability for Implementation*

Accountability for implementation should reside at a higher level than proposed. Ultimately, responsibility rests with the city council, but at the staff level it should rest with a **single position** in order to avoid lack of clarity regarding roles and responsibilities. As recommended by the MCCC, there should be a "**senior-level position that reports directly to the mayor and city council** to oversee all aspects of climate-change planning and implementation." Notably, the city auditor found that "Centralized Management and Oversight of the City's Sustainability Efforts May Better Position the City to Establish Sustainability as an Organizational Priority and Core Value."

#### *Quarterly Reporting*

Greater transparency both to the City Council and to the public is required to ensure accountability. The draft proposes annual reporting, which is inadequate for ensuring timely implementation and for identifying and rectifying challenges. As recommended by the MCCC, responsible staff should "[r]eport progress along defined metrics of success to the mayors, city councils and the public on a **quarterly basis**." Similarly, the City auditor found that "Improved Monitoring and Reporting of Sustainability Data, Progress, and Outcomes Is Essential for Tracking Impacts and Realizing the Intended Benefits."

### *Specific and Enforceable Measures*

While many of the measures in the draft are specific and actionable, there are some that are too soft or vague to be measured. These are discussed later in this document, by section. Effective implementation and reporting requires that all **measures be specific and enforceable**.

### *Implementation Timeline*

The implementation timelines should be more specific. While recognizing that greater specificity is not possible for out-years, it should be provided for the nearer future. We recommend that the regular reports to Council include, in addition to reporting on progress to date, a **rolling 2-3 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**.

### *Departmental Alignment*

As recommended by the MCCC, the City should “[a]lign each city department’s mission, operating procedures, funding priorities and planning documents with the carbon zero vision.” Again, the City auditor noted the importance of this, finding that “Awareness of and Compliance with Sustainable Policies, Procedures, and Plans Could Be Strengthened.”

### *Educate and Incentivize Partners*

The draft CAAP notes the roles that others must play to ensure effective implementation, including business, residents, and community-based organizations. We recommend the addition of meaningful measures that will **educate and incentivize** this to actually happen.

# Implementation and Monitoring Review

## *Comments on Section 8*

### Specific Comments

- Recommend that the City consider designating an outside organization to serve in a project management function for developing implementation strategies such as identifying new funding and financing options, leveraging outside funding sources, and finding new partners and resources. This type of assistance will be valuable as Appendix D acknowledges that the City will likely struggle to identify all the necessary funding for timely implementation of the CAAP.
- Recommend the City create detailed implementation plans for each GHG-reduction measure with milestones, deadlines, funding opportunities, partners, programs, and other details, as necessary, to support implementation.
- A more robust discussion of the process for adaptively managing CAAP implementation, in particular the remedy for shortfalls or ineffective programs, would be helpful along with discussion of potential points of failure or possible areas of underperformance. For example, some measures included in the CAAP may not be as effective as originally anticipated or could present concerns or controversy that have the potential to delay or complicate measure implementation. A failure or underperformance in one measure could create a cascading effect on dependent measures.
- **Table 8-1** lists City-led measures. Recommend a similar at-a-glance table for non-City-led measures described in Chapter 6 that integrates high-level information on costs and funding sources from Appendix D. A Chapter 8 at-a glance implementation matrix of all measures included in the CAAP would ideally include lead and supporting organizations, implementation method (ordinances, code, incentives, education and outreach, etc.), implementation phase (or year), estimated cost, and expected funding source. This would be a handy reference for CAAP users.
- **Appendix D Table 1:** While Table 1 in the funding and financing plan in Appendix D is helpful, more detail on estimated costs and funding or financing strategy for many measures is vague. Low-, moderate-, and high-costs categories don't provide sufficient detail to ensure that measure implementation costs will be adequately contained within City department budgets, capital improvement plans and other programs. This is the case where City costs are estimated to be low and moderate-cost measures, costs are yet To Be Determined (TBD), and/or where in-kind staff time is anticipated.

- **Table 8-2:** The CAAP implementation timeline is valuable and may help to avoid future delays in publishing emissions inventories, progress reporting and revisions to the plan. CAAP states that City “may opt to conduct an update to the CAAP after the milestone year of 2025 to ensure the 2030 target is met (page 142),” it is recommended that City plan on updating the CAAP in 2025, even though it is less than the 5-year update cycle as this is a critical year to for verifying 2030 GHG emission reduction progress.
- Additional 2025 GHG emissions milestones would be helpful, where appropriate, to assist in tracking compliance with 2030 emissions goals. 2025 milestones would allow adequate time to revise the CAAP adding or adjusting implementation measures as needed.
- There appears to be a discrepancy between text on page 142 and Table 8-2. Text indicates that an annual report will include a qualitative discussion of implementation for each measure while Table 8-2 indicates that annual reports will alternate between quantitative (even years) and qualitative (odd years) analyses.

# Community Action and Sustainability Review

## ***Comments on Section 9***

Section 9's described roles that residents, businesses, and other organizations play in GHG reduction does not leave an impression of urgency. Recommend adopting an "all hands-on deck" approach stressing the need for timely and concerted effort across all who live, work, and play in the City of Sacramento. Turning the CAAP into action requires the city, residents, businesses, and other organizations to urgently rise to the challenge of making changes in lifestyle and everyday decisions.

## **Specific Comments**

- Why does active transportation have "Moderate to High" impact and ZEVs have "High" impact? ZEVs still contribute to VMT and may still emit GHGs depending on energy source for the electricity. AT trips do not contribute to VMT, and it seems like their impact is High.

## City of Sacramento

<b>Full Name</b>	<b>First Name:</b> Susan <b>Last Name:</b> Herre
<b>Email</b>	████████████████████
<b>Message</b>	RE: Prelim. Public Review Draft, City of Sac CAAP of 7/1/22, comments due 7/30/22 July 30, 2022 Dear Mr. Mayor and Council Members, Thank you for the opportunity to comment. Please see our comments on the attached document. Susan
<b>Upload File(s)</b>	220730 ECOS Letter and comments -- City of Sac CAAP Draft.pdf



ECOS

ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

Post Office Box 1526 | Sacramento, CA 95812-1526

July 30, 2022

Mayor and Council Members  
City of Sacramento  
915 I Street, Sacramento, CA 95814  
Sent via email [cap@cityofsacramento.org](mailto:cap@cityofsacramento.org)

SUBJECT: Prelim. Public Review Draft, City of Sacramento Climate Action Plan (CAP) released July 1, 2022

Dear Mr. Mayor and Council Members,

Thank you for the opportunity to comment on the subject CAP.

Please refer to Table of Contents on the following page and the comments following.

Sincerely,

Susan Herre AIA AICP  
President of the Board of Directors  
Environmental Council of Sacramento

cc:

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July 29, 2022

Greg Sandlund  
Planning Director  
City of Sacramento  
915 I Street  
Sacramento, CA 95814  
Via E mail: CAP@cityofsacramento.org

Subject: Recommendations to Strengthen the City of Sacramento's proposed Climate Action and Adaptation Plan

Dear Mr. Sandlund,

The Environmental Council of Sacramento, the Sacramento Valley Chapter of the California Native Plant Society, the Sacramento Audubon Society, the Sierra Club Sacramento Group, and the Xerces Society are submitting the following recommendations to strengthen the proposed City of Sacramento's (City) July 2022 Climate Action and Adaptation Plan (Plan) regarding water resources and their use.

In general, we find that the Plan does not make a sufficient case of the importance of using water resources efficiently as a key, climate adaptation strategy. We believe the Plan diminishes the impacts climate change will have on regional water supplies and fails to make the point that much of the City's landscaping is not compatible with this region's climate and will become even less compatible as we experience a drier, hotter climate. We recommend the City CAP include a plan to embark on a City-wide Landscape Climate Adaptation Program that educates and assists all of its citizens and businesses to convert ornamental turf grass and high water demand plantings and shrubs, and works to replace high water demand trees, with climate adaptive plants, with an emphasis on the use of local native plantings. Local native plants provide the region's pollinators, beneficial insects, birds, and animals climate adaption habitat while also providing carbon sequestration benefits and a healthy, beautiful human outdoor environment. Native trees, such as valley, blue, and interior live oaks are not only drought tolerant but also provide a high degree of carbon sequestration/storage. Native grassland species, like our state grass Purple Needle Grass, sequester carbon while increasing water infiltration into the soil and resilience against erosion.

The City's inclusion of these recommendations into the Plan will increase the City, and its citizens, preparedness to meet the challenges of our changing climate and its impact on the region's water resources and environment. We note that the City is already moving in important directions to conserve water, improve landscaped areas' ability to adapt to climate change, and implement measures to deal with coming droughts and flood events. The City's implementation of the following recommendations will extend and strengthen already identified CAP initiatives and result in a more effective citywide Climate Action and Adaptation Plan.

The following comments have been organized to track specific areas already identified in the Plan:

### **Chapter 01. Introduction**

This chapter presents a general discussion of the potential impacts of climate change including the climate's impact on the region's water resources. The document's general tone indicates that climate change may have significant negative impacts on the City but does not put those impacts in terms the public can understand. Specifically, with regard to water resources, what are the specific consequences to the City and its residents when extended droughts impact regional water supplies and what is the impact on the lower American River? The document does not establish a need for action or alarm because the public is left with the impression that State standards and actions by others will cause the City to meet its goals with respect to its water needs. It is unlikely the public, or for that matter the local water agencies, will be persuaded to take the actions suggested later in the Plan unless the document makes a compelling argument for those actions. We suggest that the document serve to motivate the citizenry to take immediate actions on their own with strongly recommended actions.

For example, the Introduction includes a brief narrative of climate change implications for the region's water supplies without explaining their implications for individual City residents. However, later in the document the statement is made that groundwater is being managed sustainably. This statement, along with statements relying on the State's efforts to continue to develop water efficiency standards seems to lead the City and its citizens to believe there is no pressing concern for the sustainability and reliability of the region's water supplies. We submit that the region's water future is likely to be much more precarious than the Plan indicates.

Regarding the region's groundwater, the Groundwater Sustainability Agencies (GSA) responsible for the North American, South American, and Cosumnes Subbasins developed their Groundwater Sustainability Plans (GSP) using modest climate change impact assessments. Even with these assessments two of the three regional Subbasins are marginally sustainable over the next twenty years while the Cosumnes is already undergoing groundwater management actions and projects to deal with chronic over drafting. However, current climate scientist assessments indicate that a Hot Dry assessment for our region is far more likely to occur than the more modest assessment used by the GSAs when developing their GSPs. We believe this means the region's ability to draw from groundwater to replace reduced surface water in dry years may not be as reliable as the current GSP projections indicate and that efforts to reduce demand now will help the basins retain groundwater needed later during the predicted hot and dry weather increasingly experienced in the region.

The region's surface water rights, the full appropriations water purveyors depend on, are no less guaranteed. While we may be able to rely on minimal water allocations for public health and safety during hot dry periods, these allocations may not be sufficient to maintain the tree canopy areas the CAP relies upon for future carbon sequestration. These allocations likely won't be sufficient to maintain the landscaping within the City made up of turf grass, and non-native plants, shrubs, and trees that are not appropriate for our region's climate. While the State and City landscape standards may lead to appropriate landscaping for new construction, they do not directly address the thousands of homes and businesses that maintain landscaping not appropriate for our region. This leaves the City's existing residents to suffer a cycle of bust/boom/bust landscaping – brown lawns and shrubs during increasing droughts and heat storms interspersed by reinvestments to re-green landscaping during wetter periods.

The region's Water Forum is conducting a technical analysis that is attempting to assess how various climate scenarios, including a Hot Dry climate assessment, impact the region's surface and groundwater resources. This analysis is attempting to integrate both current climate modeling and the assumptions for water management utilized by the Bureau of Reclamation and other water managers, to understand how climate change will impact our region's water supply reliability and sustainability for the future. We recommend the City consider this analysis in its determination and explanation of the vulnerability of the region' and City's water supplies. The analysis is expected be available later this year.

**City-wide Climate Adaptation Program (Program) to Promote Durable, Biodiverse, Water Conserving Habitat Through the replacement of Ornamental Turf/High Water Use Landscaping With Local Native Plants**

This proposed Program calls for a Citywide effort involving all City departments, ECOS, Habitat 2020, other community organizations, the Regional Water Authority (RWA), the Water Forum, and other associated water agencies. The Program joins together the efforts and resources of all these groups and organizations to achieve meaningful climate adaptation through landscape conversion in our region. The City's leadership and support of this effort can be instrumental in building the momentum necessary for a regional effort that can engage other community-based organizations, local governments, and water purveyors.

A City-led, regionally based Program may increase the availability of state financial support. In a recent briefing sponsored by the RWA for local water purveyor officials, the Chairman of the State Water Resources Control Board, Joaquin Esquivel, stated, among other topics, that water conservation is critical to the state's ability to adapt to a changing climate. He went on to say that as far as municipal, commercial, and industrial water use is concerned, outdoor landscaping poses the big target of opportunity, and that replacement of ornamental turf grass and other water demanding, climate inappropriate landscaping with local, low water use, native plants is the direction the state should pursue. He recognized both the water savings and the biodiversity benefits inherent in this habitat change and invited participants to propose programs that the state can help support to make this type of conversion.

The following description provides ideas for the Program's scope and breadth. These are not new concepts, and many can be found in sections of the Plan. Our recommendation is that the City pull them together into a City wide program that has resources, staffing and a single purpose to

accomplish this critical climate adaptation. We believe it will require a concerted effort to achieve the Program's objectives in a timely fashion for current City residents, before an ongoing or future drought cycle further erodes the beauty and the health of the city and the biodiversity of our region.

Program elements include:

1. Community education: RWA public service announcements and other public information targeted to reinforce the City's Program elements, a 'how to' web site coordinated with CNPS (info on designs, plant selection and how to do it info); participating Water Agency (WA) outreach (bill stuffers, community meetings, demo garden demonstrations); Sac Bee and possible local TV station commitment; CNPS garden portfolio (virtual tours of area low water use, native plant gardens with plant lists); Community NGOs using their voices to call for habitat adaptation including turf replacement; and emphasis on the program at community and environmental events including Earth Day. Information developed by the City in conjunction with CNPS, other subject matter experts, and the real estate community is provided to new and existing home purchasers on how to select and care for water wise, biodiverse landscaping. The City should request state funding support for communication strategies and materials that will be used both across city and the region to promote landscape change.

2. City water purveyor customer information/financial assistance programs targeted to encourage climate adaptive landscaping including the replacement of turf and high water use landscaping with local native plants: These programs will be offered to the wide array of property owners including individual homeowners, commercial property owners, HOA's and rental property owners, and property managers. Programs will also be developed to assist the City's own facilities and public spaces, parks, transportation right of ways and corridors as well as medians, and corridors and facilities of other public jurisdictions within the city. The City should request state funding to supplement local rate payer funds for these programs.

3. Focused Low-income owner /renter program: The City should request State supplemental funding to support City and WA programs developed and directed to encourage and provide specific climate adaptive landscaping, including turf replacement and landscape water efficiency for rental units and low-income homeowners. As with the other elements of this Program, the City should work with other local governments to extend these programs region wide.

4. New Building Industry pledge: The City should work to secure a Building Industry pledge to only install reclaimed water for all outdoor landscaping use, eliminate ornamental turf, utilize low water local native plants in all communal landscaping and any landscaping provided to homeowners by the developer. The City should request state funding to supplement any additional costs to low income and affordable housing projects within the city.

5. Local government commitments as expressed in Climate Action Plans (CAP) to eliminate ornamental turf, modernize irrigation, replace all high water use landscaping in public facilities, parks, and transportation corridors by 2030. The City should request state funding support to

assist it in these conversions. CAP required elimination of high water use landscaping and ornamental turf as part of new construction landscaping and any permit requiring new or retrofit landscaping should be coupled with the requirement for the use of low water use, local native plants in all future landscaping.

6. Focused landscape industry technical training on turf replacement and low water, native plant selection, planting, and maintenance: The City should work with the landscape industry, CNPS and others to update and revise existing training and certification programs to be consistent with the City's climate adaptation objectives. The City should request State funding to modify existing technical training/certifications to include this information and training.

7. Bilingual training and assistance for home garden maintenance contractors: The City should develop a program to provide bilingual incentives, training and certification for home garden contractors who cut grass & blow leaves to enable them to be able to (1) co-design and maintain low water use local native plants and edible, lower maintenance gardens w/ home owner; (2) construct and maintain low water and water storage systems; (3) create, purchase, and install compost bins (in areas not serviced by local utilities) and systems including use of "lasagna" layered soil development & water retention techniques; and (4) in concert with the Tree Foundation and local nurseries supply native, medicinal & edible planted gardens including shade for the home, and trees based on permaculture techniques that sequester carbon. Request State funding to develop/modify existing tech training/certifications to include this information and training for this group of contractors. A program including financial assistance to allow program participants to become certified should be instituted. Technical assistance from CNPS and Master Gardeners to develop this program may be required.

8. Enhance the availability of the wide range of local native plants to meet program demands: the City should work with local nurseries and growers to expand local native plant marketing and available offerings. CNPS and other regional purveyors of local native plants can provide technical assistance to nursery/growers who participate in the program. Develop a plant labeling system to tie into the program. Seek state funding to assist in developing the nursery/grower infrastructure needed to support the region's climate adaptation program.

### **Specific suggestions for Plan improvements**

#### **Page 5 Community Health and Resiliency**

Add a new measure titled Water Efficiency. Include under this measure those items throughout the existing Plan dealing with water use and water efficiency. Add the major new initiative suggested above to promote durable, biodiverse, water conserving habitat within the City landscape by replacing ornamental turf/high water use landscaping with local native plants.

#### **Page 5 Urban Greening and Forestry**

In addition to the resources listed in the Plan, the City should consult and work with the State California Native Plant Society's (CNPS) Calscape.org data base of low water use local native

plants, the Sac Valley Homegrown Habitat local native plant list, the UC Davis All-Stars plant list, the Sac Tree foundation's Shady 80 tree list, information from the Xerces Society and the Sacramento Audubon Society. These information and technical expertise sources can assist the City in tree selection and other aspects of resilient habitat development. The Sacramento Tree Foundation also maintains a list which is updated regularly grading the carbon sequestering capacity of native and other shade trees that can be used to guide tree selection for public and private plantings.

Tree selection is also important for long term resilience and carbon sequestration. Fast growing trees are not always the best choices for longer term environmental health. In addition, the City should commission a study to assess how to efficiently water the existing and new tree canopy. As water utilities improve leak detection and water conservation programs. Some of the water the tree canopy may have relied upon is reduced. Provisions may need to be made to effectively water the tree canopy in the future when conditions warrant it.

#### Page 52. City buildings

The City should rapidly carry out a city-wide property landscape irrigation audit that includes the following actions:

1. The identification of all essential and nonessential turf. For essential turf, the audit should focus on improving watering practices. For nonessential turf, a plan and timetable should be developed to phase it out by 2030. Nonessential turf should be replaced with low water, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees.
2. The Audit should also focus on non turf landscaping and identify landscape areas that include water wasting plantings as well as water system efficiency improvements. The water wasting planting areas should be phased out and replaced by 2030 with low water, drought tolerant plants with an emphasis on local native plants and trees. In areas where high water use trees exist, successor plantings of low water use trees should be implemented.
3. All existing tree plantings should be evaluated for watering efficiency in each phase of the audit.
4. All new City building landscaping and any landscape refurbishment should meet a goal of 100% low water use landscaping (except for essential turf grass). The City should make use of local native plants and trees. All City buildings and facilities should include public information regarding the low water plants being used, how they are planted and cared for, and where additional information regarding sustainable landscaping can be obtained.
5. Actions to increase the use of gray and recycled water as well as rain gardens and other mechanisms to encourage storm water capture and infiltration should be incorporated into both existing and new City facilities.

#### Page 54 Transportation

The City should make use of low water, native plants and trees in transportation corridor medians and curb areas, other transportation and pedestrian right of way landscaping, and parking landscaping. The County should coordinate with the State California Native Plant Society's Plants for Parkways program for information and technical assistance on appropriate native plant selection, landscape design and planting tips, and plant watering and maintenance tips for this region. In addition, the City should consider working with the Sacramento Valley

Chapter of the California Native Plant Society (Sac Valley CNPS), Xerces Society, the California Native Grassland Association and the Sacramento Audubon Society to ensure county personnel are trained on how to select, plant, and care for low water use local native plants.

#### Page 64 Increasing Green Space and Shade

For purposes of this and all other recommendations regarding the use of low water, drought tolerant plants and/or permeable ground covering with an emphasis on local native plants and trees, the City should rely on the State California Native Plant Society's (CNPS) Calscape.org data base of low water use local native plants, the Sac Valley Homegrown Habitat local native plant list, the UC Davis All-Stars list, the Sac Tree foundation's Shady 80 tree list, information from the Xerces Society and the Sacramento Audubon Society. Public awareness of the City's landscaping changes, including the lists of available and appropriate landscape plants and techniques to ensure they thrive, should be incorporated in the City's water efficiency outreach program.

#### Page 65 Building Strategy – see comments related to page 52

#### Page 66 Transportation Strategy

Rapid Transit and transmission corridors are excellent places to employ low or no water use local native plants. While trees are not welcome around power lines, they are effective in parking areas and as landscape shade where appropriate. Native grassland species are great candidates to plant around powerlines or in other situations where plant height is an issue. These species are ecologically critical but often underappreciated. Cool and permeable pavement should be used in parking lots and other paved areas where trees are planted in tree wells for shading, such as large parking lots, and extensive pavement surrounding commercial buildings. Tree wells must be adequate to accommodate the necessary root structure for the trees to be planted in these areas.

#### Page 67 Waste Strategy

Methane gas release from old landfills can contribute to greenhouse gas emissions. The City should consider conducting a study of its old landfill sites to ensure that everything is being done to effectively manage and remaining methane production from these sites.

#### Page 114 Local Food Planning

The concepts of community education, tool banks and technical assistance discussed in this initiative can be broadened to assist low-income communities to replace turf lawns and high water use plants with local native plants. This program may also be a hub for financial assistance. Consideration should be given to the expansion of this initiative so that it dovetails with the City-wide climate adaptation program described above that promote durable, biodiverse, water conserving landscaping.

#### Page 118 Measure WW-1

Add the proposed Program titled City-wide Climate Adaptation Program outlined on page 3 of this letter as a major component of Measure WW-1. The Program promotes durable, biodiverse, water conserving habitat within the City through the replacement of ornamental turf/high water

use landscaping with local native plants. In addition to the Co-Benefits listed in WW-1 this Program will add the Co-Benefits of Community Cost Savings and Job Creation.

Page 119 WW-1.2

Include within the evaluation the possible impacts this approach may have on Regional San's Harvest Water Project.

Page 119 Add WW-1.8

Add a Citywide initiative involving all City departments, ECOS, Habitat 2020, other community organizations, the Regional Water Authority (RWA), the Water Forum, and other associated water agencies to achieve meaningful climate adaptation through landscape conversion in all aspects of the City's built environment. The Program will promote durable, biodiverse, water conserving habitat within the City through the replacement of ornamental turf/high water use landscaping with local native plants. The Program should be led by the City Planning Department with support from Utilities and Public Works. The Program will reduce the electricity needed to supply landscape water, reduce per capita water use, improve landscape climate resiliency and carbon sequestration, and enhance the area's biodiversity. The City's leadership and support of this effort can be instrumental in building the momentum necessary for a regional effort that can engage other community-based organizations, local governments, and water purveyors

Page 142 Reporting on Progress

Publish on the City's web site water use (GPCD) statistics, (available from the California Department of Water Resources and the City Water Utility) for customers monthly water use. The City's performance in comparison with the Governor's voluntary conservation goal should also be included. This information should enable area residents to gage their own water use in comparison to others in the region and across the state. Information about the City's own water use should also be posted. This information will be useful in determining how successful the City's efforts are in reducing its own as well as its citizens water demand.

Page 183 MM 5.8

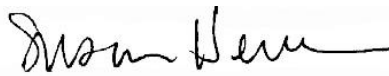
The City should participate with Sacramento Area Flood Control Agency (SAFCA), State Department of Water Resources, the Bureau of Reclamation, the Sacramento Water Forum (WF), Regional Water Authority (RWA), local water agencies and other interested parties in the development of excess storm water recharge projects including Flood MAR. Activities that should be pursued include:

1. Identifying priority recharge areas within the County, including Paleochannels, and moves to zone such properties for that purpose.
2. Convening discussions with Groundwater Sustainability Agencies, RWA, Sacramento Area Flood Control Authority, Water Forum, conservation landowners, agricultural interests, other municipalities, and others interested in developing and securing multi benefit projects that can be utilized for groundwater recharge in the three groundwater subbasins.
3. The City should consider actively participating in the facilitation of the acquisition (purchase, conservation leases, or other means) of viable projects.

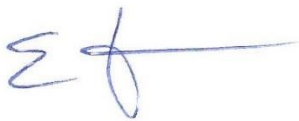


4. The City should become involved in determining when and how some of the excess storm water from future storm events that moves down the Sacramento River can be diverted either out into the bypass or other diversion points for recharge benefits for this region.

The City of Sacramento's proposed Climate Action and Adaptation Plan moves the City forward in its efforts to adapt to the region's changing climate. We believe our recommendations will strengthen the measures outlined in the plan and are consistent with the direction the City has and is prepared to take. We urge you to include our recommendations when you adopt the Plan and offer our support and technical expertise to aid the City and its staff in the implementation of the recommendations for which we have expertise.



Susan Herre  
President of the ECOS Board of Directors



Ellen Pimentel  
President, Sacramento Valley Chapter of the  
Society California Native Plant Society



Paul Miller  
President, Sacramento Audubon



Barbara Leary  
President, Sierra Club Sacramento Group



Angela Laws  
President, Xerxes Society

----- Forwarded Message -----

**From:** Anthony DeRiggi [REDACTED]  
**Sent:** Monday, July 25, 2022 at 08:47:44 PM PDT  
**Subject:** City CAAP comments

To Planning Staff and City Council members,

Thank you for the opportunity to provide comments regarding the City Climate Action and Adaptation Plan. The plan needs to have a GHG measure and action regarding the elimination of fossil-fuel powered landscaping equipment.

### **Brief background:**

The California Air Resources Board (CARB) reports that the small off-road engines used mainly for landscaping work now produce more smog-forming emissions than those from all the cars (approximately 30 million vehicles) operating in California. The most egregious polluter in this category is the gasoline-powered leaf blower. Using a gas leaf-blower for one hour produces the same amount of emissions as driving a typical passenger car 1100 miles. These powerful machines typically produce air-speeds of over 200 miles per hour and increase airborne particulates including pollen, mold, asbestos, animal feces, herbicides and pesticides. They also cause significant noise pollution, which can cause hearing loss, increased blood pressure, and heart disease. Persistent loud noise has also been shown to interfere with mating behavior in birds and other wildlife.

The **environmental justice** aspect of this measure is significant, as the majority of gardening and landscaping employees are from EJ disadvantaged communities. Their work requires them to carry a 30 pound gas engine on their back, which exposes them to high levels of emissions, including particulates, carbon monoxide, benzene, and other VOC's. They are also exposed to harmful levels of noise from the engines, which often exceed 85 dB, which according to NIOSH, can cause permanent hearing loss from 8 hrs of exposure, and also harmful cardiovascular effects.

CARB recently banned the sale of new gas-powered leaf blowers in the State of California starting in 2024, and will phase out the sale of all other gas powered landscaping equipment by 2028. Over 25 California cities have already completely banned the use of gas-powered leaf blowers, including Oakland, Santa Monica, South Pasadena, Claremont, Sonoma, Berkeley and Hermosa Beach.

A measure is needed to "**eliminate fossil-fuel powered landscaping equipment**". This measure has significant air quality and health co-benefits, including **Public Health** (reduced harmful emissions and noise), **Community Cost-savings** (no need to buy expensive gasoline and oil), **Job Creation** (production and sales of electric equipment) and **Environmental Quality** (reducing air and noise pollution, improving wildlife habitat)

**Actions** should include:

1. Develop and adopt an ordinance to eliminate gas-powered leaf blower use by 2025, with funding to assist gardeners to trade-in old equipment and purchase zero-emission leaf blowers, mowers and extra batteries.
2. The City of Sacramento will 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.
3. The City of Sacramento will 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 will 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 will devote more resources to publicizing this program.

Thank you,

Anthony DeRiggi, MD  
Member of the Sacramento County Environmental Commission

# Tree Canopy

**From:** Blake Watkins [REDACTED]

**Sent:** Wednesday, July 6, 2022 10:45 AM

**To:** Ralph Propper [REDACTED]

**Subject:** Re: Release of Preliminary Public Review Draft of the Sacramento Climate Action Plan

The primary goal of the CAAP as it relates to tree is to increase the City's tree canopy from 19% in its current state to 25% in eight years and to 35% by 2030. A 25% tree canopy would give us the best canopy in CA and put us among the best canopies in on the west coast (Portland 30%, Seattle 28%). A 35% tree canopy would put us in contention with some East Coast cities (Baltimore 27%, Washington DC 36%). An ambitious goal for sure. Unfortunately, the measures and funding sources identified in the CAAP do not appear to be adequate to reach those goals.

Increasing the City's urban tree canopy would save 23,053 MT of CO2 by 2030 and 61,474 MT of CO2 by 2045. The estimated costs to the City of this goal are \$6-10 MM for additional maintenance of city-managed trees. The CAAP recognizes what is likely the biggest barrier to accomplishing these goals: "There is not nearly enough space to achieve 35% tree canopy coverage on City-owned/controlled land alone. 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. City staff are evaluating options, and direction is to be confirmed with the City Manager". The only private property planting project recognized is the SMUD/Sacramento tree foundation free shade tree program (CS 1.4) and the CAAP recommendation to "continue to support."

The CAAP recognizes the need for environmental justice and equity in tree planting and canopy improvements. As well as the funding challenges for tree maintenance and irrigation in low-income areas. One part of this goal is to "Create, expand, or improve parks in under-served communities as part of a capital improvement project; Participate in tree planting projects at park sites with community partners and consider tree acquisition, planting, and irrigation (including hand-watering)." Many environmental and health benefits are the results of robust tree canopy -- the inequity in Sacramento is obvious. There are challenges to increasing the tree canopy in the areas that need it the most and the CAAP goes only as far as to recognize that "new funding sources are needed" to support these initiatives.

I am most intrigued by this brief statement that the city shall "continue to enforce zoning standards for shading in private parking lots to protect trees in existing parking lots". The enforcement of current requirements for tree planting and tree protection on private property is essential to the achievement of these goals.

Additional actions call for utilizing compost and mulch on City trees to increase carbon sequestration in the soil (CS-1.2) and (MM-6). Also to "develop online educational materials for climate adapted tree species selection" (CS-1.3).

I am looking forward to more details in the Urban Forest Master Plan which I hope will specify more specific measures for tree planting on private property, funding sources for planting and maintenance for low-income areas, and recommend measures to enforce existing protections of mature trees in the City.

July 26, 2022, by Kim Oldehoeft

### 1. Consult Local Indigenous Tribes on the CAP

Indigenous Traditional Ecological Knowledge is integral for adapting to climate change and greatly reducing emissions. The CAP should collaborate closely with local Indigenous leaders and adjust the document to include priorities determined by the Indigenous. Additionally, California State Assembly Bill 52 requires public agencies to “consult with California Native American tribes that are on the Native American Heritage Commission’s (NAHC) consultation list that are traditionally and culturally affiliated with the geographic area of a proposed project that is subject to the California Environmental Quality Act (CEQA)”.<sup>1</sup> Sacramento is the ancestral homeland of the Nisenan, Maidu, Miwok and Me-Wuk Peoples, who are the Indigenous Peoples of this land, and have lived here since antiquity. Indigenous Peoples must be included in creating a Climate Action Plan for the City of Sacramento.

From the Intergovernmental Panel on Climate Change (IPCC) (emphasis mine):

“Indigenous, local, and traditional forms of knowledge are a major resource for adapting to climate change ... **Natural resource dependent communities, including indigenous peoples, have a long history of adapting to highly variable and changing social and ecological conditions.** But the salience of indigenous, local, and traditional knowledge will be challenged by climate change impacts. Such forms of knowledge are often neglected in policy and research, and their mutual recognition and integration with scientific knowledge will increase the effectiveness of adaptation.”<sup>2</sup>

From the International Labour Office, Geneva (emphases are mine):

“**Indigenous peoples’ knowledge and cultural approaches to interacting with ecosystems as well as natural resources are unique, and of high relevance and value for climate change adaptation.** For example, climate-smart agriculture, as promoted by the Food and Agricultural Organization of the United Nations (FAO), incorporates a combination of traditional and modern techniques based on genetic databanks, set up by private and public initiatives, which benefit from and are often dependent on indigenous knowledge. Climate-smart agriculture is one of the most widely promoted techniques aimed at mitigating and adapting to climate change, as it has proven to be so highly effective in this regard.

“**A growing body of research suggests that indigenous peoples have a long record of adapting to climate variability, drawing on their traditional knowledge, which enhances their resilience.** A study by IUCN10 has identified a number of traditional and innovative

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<sup>1</sup> <http://nahc.ca.gov/2015/06/implementation-of-ab-52-ceqa-tribal-consultation-information/>

<sup>2</sup> W.N. Adger, J.M. Pulhin, J. Barnett et al.: “Human security”, in C.B. Field, V.R. Barros, D.J. Dokken et al. (eds): Climate Change 2014: Impacts, Adaptation, and Vulnerability. Part A: Global and Sectoral Aspects. Contribution of Working Group II to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (Cambridge and New York, Cambridge University Press, 2014), pp. 775–791.

adaptive practices, including shoreline reinforcement; improved building technologies; increased water quality testing; rainwater harvesting; supplementary irrigation; traditional farming techniques to protect watersheds; changing hunting and gathering habits and periods; crop and livelihood diversification; the use of new materials; and community-based disaster-risk reduction. Similarly, several indigenous crop varieties and agricultural practices have been found to present advantages in terms of drought, pest and flood tolerance. For instance, communities in the Mekong Delta have been observed to sow sun rice (a wild rice variety) on land that is frequently flooded. **This knowledge is fundamental to the maintenance and development of successful measures for the mitigation of and adaptation to climate change.**

“Critically, the living space, biodiversity conservation, land and forest management, traditional knowledge, livelihood strategies, occupations and ways of life of indigenous peoples generate synergies between measures aimed at climate mitigation and adaptation. In terms of climate language, additional co-benefits are also generated. As outlined above, **the knowledge and practices of indigenous peoples are already leading the way in sustainable agriculture and forestry, protecting ecosystems for carbon storage, and providing other ecosystem services which are fundamental for combating climate change, reducing emissions from deforestation and land degradation and also key for adaptation to climate change.** Co-benefits include enhanced livelihood security and green growth.”<sup>3</sup>

Indigenous Peoples are particularly vulnerable to climate change because their culture has a heavy reliance on natural resources, they subsist on plants and animals, and they are closely connected with the land where they reside. The United States Geological Survey has created Climate Action Science Centers to work directly with land managers to create research and tools for adaptation to climate changes. They are partnering with Tribal Nations and Tribal organizations to better understand their specific vulnerabilities to climate change, to assist their adaptation planning, and to address their climate science needs. The City of Sacramento must also work closely with the local Indigenous Peoples to design the CAP.

## 2. Native Plant Restoration and Habitat Connectivity

*Native Plant: A plant that is a part of the balance of nature that has developed over hundreds or thousands of years in a particular region or ecosystem.*<sup>4</sup>

Address how the City will make use of native plants to build resilience and connectivity in the local ecosystem. Species within a native ecosystem share eons of evolutionary history. California native plants are critical for California native mammals, birds, reptiles, amphibians, insects and other invertebrates, and microbes. The whole of an ecosystem is more than the sum of its parts, and connected native plant habitat cannot be overemphasized, especially when creating a Climate Action

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<sup>3</sup> International Labour Office, Geneva. (2017). Indigenous peoples and climate change: From victims to change agents through decent work. International Labour Office, Gender, Equality and Diversity Branch. - Geneva: ILO, 2017.

[https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/publication/wcms\\_551189.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/publication/wcms_551189.pdf)

<sup>4</sup> [https://www.nrcs.usda.gov/wps/portal/nrcs/detail/ct/technical/ecoscience/invasive/?cid=nrcs142p2\\_011124](https://www.nrcs.usda.gov/wps/portal/nrcs/detail/ct/technical/ecoscience/invasive/?cid=nrcs142p2_011124)

Plan for a region. Native plants may be more adept at carbon sequestration than non-native species.<sup>5</sup> As the climate changes, native plants are vulnerable to being outcompeted by non-native, invasive plants. As California is considered a Biodiversity Hotspot, it is critical to give native species the best chance of survival within the changing climate.

“California native plants are not only beautiful, they are also essential components of our ecosystems and natural processes, and provide us with valuable renewable materials and other benefits. California hosts approximately 6,500 species, subspecies, and varieties of native plants, many of which are found nowhere else in the world, and many animal species depend on these native plants for food and shelter. Unfortunately, California’s unique plant biodiversity and the ecosystems upon which it depends are especially vulnerable to the effects of climate change. It is estimated that approximately 66 percent of California’s endemic plant species will experience decreases of up to 80 percent in the size of their ranges within the next 100 years.”<sup>6</sup>

(We must) “Reduce the threat of invasive species expansion and incorporate diverse native species instead. Removing invasive plants from your garden and choosing an array of native alternatives can minimize the threat of invasive species expansion. Native plants help to maintain important pollinator connections and ensure food sources for wildlife; nonnative plants can outcompete these important native species for habitat and food.”<sup>7</sup>

The CAP should prioritize the creation of a city-wide revegetation plan that includes sowing and maintaining native plants. Revegetation sites should include but not be limited to highway interchanges, city parks, and any open patch of unvegetated dirt within the urban landscape. This revegetation program should be under the advisement and scrutiny of the California Native Plant Society, Sacramento Tree Foundation, University of California Master Gardeners, Sacramento Audubon Society, state and federal Agency biologists, the Nisenan, the Maidu, the Miwok and the Me-Wuk.

There are vast benefits to using native plants at a time when the climate is struggling, among these include carbon sequestration, reducing air pollution, cleaner water (fewer synthetic chemicals used), and water conservation. The National Audubon Society ascribes these benefits (emphasis is mine).

“Healthy Places for People: Lawns and the ubiquitous bark-mulched landscapes are notorious for requiring profuse amounts of artificial fertilizers and synthetic chemical pesticides and herbicides. The traditional suburban lawn, on average, has 10x more chemical pesticides per acre than farmland. By choosing native plants for your landscaping, you are not only helping wildlife, but you are creating a healthier place for yourself, your family, and your community.

**“Helping the Climate: Landscaping with native plants can combat climate change. In addition to the reduced noise and carbon pollution from lawn mower exhaust, many native plants,**

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<sup>5</sup> Rodríguez-Loinaz G, Amezaga I, Onaindia M. Use of native species to improve carbon sequestration and contribute towards solving the environmental problems of the timberlands in Biscay, northern Spain. *J Environ Manage.* 2013 May 15;120:18-26. doi: 10.1016/j.jenvman.2013.01.032. Epub 2013 Mar 15. PMID: 23500105.  
<https://academic.oup.com/aobpla/article/9/1/plx004/2953234>

<sup>6</sup> <https://wildlife.ca.gov/Conservation/Plants/Climate>

<sup>7</sup> <https://www.nwf.org/Our-Work/Environmental-Threats/Climate-Change/Greenhouse-Gases/Gardening-for-Climate-Change>

**especially long-living trees like oaks and maples, are effective at storing the greenhouse gas carbon dioxide.**

**“Conserving Water: Because native plants are adapted to local environmental conditions, they require far less water, saving time, money, and perhaps the most valuable natural resource, water.**

“Wildlife: In addition to providing vital habitat for birds, many other species of wildlife benefits as well. The colorful array of butterflies and moths, including the iconic monarch, the swallowtails, tortoiseshells, and beautiful blues, are all dependent on very specific native plant species. Native plants provide nectar for pollinators including hummingbirds, native bees, butterflies, moths, and bats. They provide protective shelter for many mammals. The native nuts, seeds, and fruits produced by these plants offer essential foods for all forms of wildlife.”<sup>8</sup>

The University of California’s Natural Reserve System is a haven for California’s incredible diversity, but it is not enough to sustain the diversity during a climate change. CAP can and should utilize this amazing resource and its associated experts to restore native vegetation and connect native landscapes, “for maintaining biodiversity and the important ecosystem services we all rely on”.<sup>9</sup> The CAP has a unique opportunity to bolster protection for California’s diversity by prioritizing native plant restoration within the urban environment, along disturbed public roadways, in public parks, and other places with a patch of available dirt including Sacramento Regional Transit stations.

A nation-wide movement has begun to create “Homegrown National Park”<sup>1011</sup> by restoring native vegetation within urban areas and specifically restoring connective habitat crucial for so many species’ survival. Within the City of Sacramento, some individual residences have converted their water-guzzling, non-native yards into native plant, water-wise, native pollinator friendly patches. As each yard is converted, neighbor by neighbor by neighborhood, we get a step closer to habitat connectivity. Individual residents of the city have chosen to do this, but it is not a city-wide effort. While the City offers incentives for yard conversion, many people are unaware and the incentives aren’t always cost-effective for homeowners.

Plants that make deep and wide roots, such as certain native perennials, will sequester more carbon, absorb more water and prevent runoff, and hold the soil together and prevent dust, among many other important services. Dust can contribute to planetary warming, and it can be prevented.

“Droughts also increase the amount of carbon dioxide in the atmosphere, including by decreasing land productivity, which reduces the amount of vegetation storing carbon dioxide. In addition, increases in drought-related wildfire and soil erosion can release carbon dioxide sequestered in trees and plants back into the atmosphere.”<sup>12</sup>

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<sup>8</sup> <https://www.audubon.org/content/why-native-plants-matter>

<sup>9</sup> <https://ucnrs.org/sheltering-californias-most-vulnerable-plants/>

<sup>10</sup> Tallamy, D. W. 2019. Nature's best hope: a new approach to conservation that starts in your yard. Portland, Oregon: Timber Press.

<sup>11</sup> <https://homegrownnationalpark.org/>

<sup>12</sup> <https://www.c2es.org/content/drought-and-climate-change/>



The CAP must address how they will support creating connective habitat as part of a plan to reduce and sequester emissions, reduce carbon emissions resulting from drought, and to fortify the chance for California's incredible biodiversity to adapt to a changing climate.

**Create rooftop habitat** on publicly owned buildings and create incentives and technical support for privately owned buildings. Rooftop habitat not only helps reduce the heat island effect<sup>13</sup>. It can also connect habitat, sequester carbon sequestration, and provide suitable cover, foraging, and breeding habitat for sensitive species such as monarch butterfly (IUCN Endangered), western bumble bee (Federally-endangered, IUCN Critical), and other animals struggling to adapt to the changing climate (e.g. birds and insects)<sup>14</sup>.

**Incentivize native plants** gardens by improving incentives and technical resources for private landowners to convert water-guzzling, non-native yards.

**Native plants in city parks:** Just as city lawns are discouraged, city parks need to undergo conversion into native plant landscapes that will create suitable habitat for wildlife species. City parks can provide refugia for migrating birds, breeding native insects and amphibians, and other wildlife species.

### 3. Carbon Farming

A wealth of existing knowledge, regional experts, and an existing network of carbon farming is already in action. As most of the state has already banded together in this effort, the City must join the California Association of Resource Conservation Districts<sup>15</sup> (CARCD) network. (RCD = Resource Conservation District).

*"RCDs around the state have begun creating and implementing Carbon Farm Plans in partnership with the Carbon Cycle Institute (CCI). Many RCDs are at the cutting edge in developing and implementing pilot projects and creating programs to incentivize and provide technical assistance for carbon farming and healthy soils projects. The California Department of Food and Agriculture, CCI, and the USDA Natural Resources Conservation Service are core partners in these efforts. The programs are designed to assist the agencies in meeting their missions and current priorities while supporting farmers and ranchers with field evaluations, irrigation techniques, and a host of other practices that reduce carbon emissions, help farmers and ranchers meet their bottom line, and provide stewardship for their land while supporting a sustainable and productive agricultural economy."<sup>16</sup>*

Numerous experts have partnered within the California Association of Resource Conservation Districts include. Utilizing this pool of experts, the City of Sacramento can develop a carbon farming plan. In joining the California Association of Resource Conservation Districts, the City would expedite carbon sequestration, and would make better use of public resources by tapping in to an existing, well-informed, multi-agency, multi-organization effort. The City must join this state-wide effort and rely on top-notch scientific research and guidance.

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<sup>13</sup> <https://www.epa.gov/heatislands/using-green-roofs-reduce-heat-islands>

<sup>14</sup> Braaker, S., J. Ghazoul, M. K. Obrist, and M. Moretti. 2014. Habitat connectivity shapes urban arthropod communities – the key role of green roofs. Ecology. DOI: 10.1890/13-0705.1

<sup>15</sup> <https://carcd.org/>

<sup>16</sup> <https://carcd.org/our-work/project/carbon-farming/>

#### 4. **Trash Reduction**

Trash clean-up, management, and reduction. No more plastic bags at stores, even with the nominal fee. No more Styrofoam. Clean up the streets regularly. Currently, City residents are cleaning up major amounts of trash on their own time and their own dime. The CAP should aim to resolve the issue of the widespread trash harming the health of our community and contributing to climate change by, at a minimum, smothering plants that could be sequestering carbon.

#### 5. **Keep Food Local**

The CAP failed to elaborate on how the City will support local farmers during extreme weather conditions. The CAP must elaborate on how it will support local farmers. The CAP should describe how it will help farmers to water crops in time of drought, how it will help farmers transport food when gas prices and gas availability become a deterrent, and how it will help farmers survive in times of severe flooding and severe drought. This includes both large and small sized farms and gardens. The City should offer a program to teach residents gardening at home, whether living on an acre of land, a small urban plot, or an apartment downtown. Gardening instruction should be made free and convenient, and it should include at a minimum the topics of subsistence gardening at home, composting food waste, keeping chickens and goats, using cover crops, and methods of crop rotation. The CAP must include a measure to create more community gardens for people who do not have access to land. The UC Master Gardeners and the Nisenan, the Maidu, the Miwok, and the Me-Wuk Peoples should be involved in designing this program and should receive funding from the City for outreach and focus on low-income residents.

6. **Permeable pavement** can help prevent runoff and recharge the aquifer<sup>17</sup>

7. **Free bike repair stations** to encourage non-motorized traffic. These stations can support citizen autonomy especially low-income folks. UC Davis serves as an example for this idea<sup>18</sup>.

8. **Fund MOSAC Outreach.** MOSAC has created a very engaging climate solutions exhibit that addresses climate change topics all citizens should be able to understand and access. Consider working with MOSAC to bring the climate message to the entire community, such as funding free passes for school-aged children or financial support for community programs to educate those who either cannot or do not go to MOSAC.

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<sup>17</sup> Miklas Scholz and Piotr Grabowiecki. 2007. Review of permeable pavement systems. Building and Environment 42: 3830–3836

<sup>18</sup> <https://www.ucdavis.edu/news/taps-sets-bike-repair-stations-around-campus>

July 29, 2022



**Climate Action and Adaptation Plan Preliminary Draft, Comments by Trees for Sacramento to the City of Sacramento Climate Action Team**

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 is vitally dependent 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.

In response, and to advise of future public hearings, please communicate via email to [trees4sacto@sbcglobal.net](mailto:trees4sacto@sbcglobal.net); our postal address is 5601 Monalee Ave, Sacramento, CA 95819.

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 CO<sub>2</sub>e). 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 CO<sub>2</sub>e in 1 year. Alternatively, planting 17 new trees removes about 1 MT CO<sub>2</sub>e from the atmosphere over 10 years."

Removing trees likewise adds MT CO<sub>2</sub>e, but this plan fails to account for ongoing loss of tree canopy, resulting increases in MT CO<sub>2</sub>e, 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 costs...." 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?

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.

### **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.

**Please review our attachments for more detailed explanation of the comments made here.**

**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**

<b>Year</b>	<b>Percent Canopy Coverage</b>	<b>Source</b>
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?*

#### Conduct Annual Program Evaluation with Transparency and Reporting

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 CO<sub>2</sub>, 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 CO<sub>2</sub> sequestration.

**The UFMP should call for the development of a measure for CO<sub>2</sub> 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

- “A Guide to Preserving Trees in Development Projects”  
Penn State College of Agricultural Sciences, September 12, 2017
- Developer Guidelines for City Street Trees  
City of Sacramento, 1994
- “Urban Forest Action Plan 2016 Implementation Update”  
City of Portland, October 2017
- “A municipal forest report card: Results for California, USA”  
E. Gregory McPherson, Louren Kotow, Urban Forestry & Urban Greening 12 (2013) pp. 134-143
- “Performance testing to identify climate-ready trees”  
E. Gregory McPherson, Allison M. Berry, Natalie S. van Doorn  
Urban Forestry & Urban Greening 29 (2018) pp. 28-39
- “Climate ready urban trees for Central Valley cities”  
E. Greg McPherson and Alison M. Berry, Western Arborist, Spring 2015
- “Re-Oaking California” in California Trees  
Winter 2018, Published by California ReLeaf
- “Focus Areas for Sacramento’s Tree Canopy”  
Presentation to UFMP Stakeholder Representative Group  
Second Meeting, July 2018
- “Year One – Tree Ordinance Update,” May 1, 2018  
To Mayor and City Council Members from Hector Baron, Director of Public Works
- “Sacramento Climate Action Plan 2012”
- “Sacramento 2035 General Plan,” Adopted March 3, 2015
- “Trees Grow on Money: Urban Tree Canopy Cover and Environmental Justice”  
PLoS ONE 10(4): e0122051. doi:10.1371/journal.pone.0122051  
Schwarz K, Fragkias M, Boone CG, Zhou W, McHale M, Grove JM, et al. (2015)
- “Report: Global Warming Of 1.5 Degrees Celsius,” IPCC, October 2018
- “Urban Forest Management Plan”  
International City/County Management Association, October 1, 2014
- “Urban Tree Canopy Assessment”  
Sacramento, CA 2018, Davey Resource Group
- “Urban Forest Resource Analysis”  
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 Berkeley 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.

Helen Selph

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**From:** Dario R. Martin [REDACTED]  
**Sent:** Friday, July 1, 2022 3:27 PM  
**To:** Climate Action Plan  
**Subject:** Fwd: CALIFORNIA - USA - I offer " House of the Future ", pyramidal ,of great resistance to the earthquake and hurricanes, efficient , intelligent and self-supplied with renewable energies  
**Attachments:** 0- Barrio Auto Sustentable.png; 0 -Con TEJAS Color Ladrillo y Balcon.jpg; 18 -Maqueta -4.jpg; 2 -Casa Rural con turbina eolica.jpg; Casa Nueva -2.jpeg; Casa Nueva -2-1.jpeg; Casa Nueva -3.jpeg; 2-PIRAMIDAL HOUSE.pdf; 1- Presentacion CASA PIRAMID-ALL.pdf

## City of Sacramento

### Sacramento Climate Action Plan

Dear Directory

Subject: **INNOVATION -I offer "House of the Future", self-supplied with Renewable Energies**

**It is my great pleasure to write to you to comment that after the earthquakes, hurricanes and natural disasters in various parts of the world and the new trend in the use of Renewable Energies, I saw the opportunity and need to contribute something to society.**

**After several months of work and waiting, I have finished: developing, calculating, registering and patenting a House of the Future, which I called **PIRAMID-ALL**.-**

**Basically it is a: "House pyramidal**

**, of great resistance to the earthquake**

**and**

**hurricanes**

**efficient and self sustainable with renewable energy (solar + wind + solar thermal)**

**,**

,  
intelligent  
" .-

**It also has a power charger for electric vehicles, coming to market.**

**This house is can be self-supplied totally or partially of energy, can be connected to the network or in an isolated place, ideal for the seismic zone, islands, Eco Villages, social housing, Rural hotel, cabins others.-**

The business proposal is to license the patent to several construction companies with great experience and backgrounds, distributed in such a way that they cover the whole USA, Puerto Rico, Hawaii, Alaska, and others

.-  
I also intend to replicate this form of business abroad, mainly in countries with a lot of earthquake, Like Chile, Perú

,  
Centro América  
and México , also in the rest of the world.-  
I attach a summary of the project.-

Publications:

[https://drive.google.com/file/d/1\\_Mniv1yt-wUyIPyBXIUmOtfuJrrZ20C4/view?usp=sharing](https://drive.google.com/file/d/1_Mniv1yt-wUyIPyBXIUmOtfuJrrZ20C4/view?usp=sharing)  
<https://www.elmundo.es/economia/vivienda/2018/01/05/5a4f3d94e2704e414e8b45d1.html>  
<http://www.innovacion.cl/entrevista/crean-prototipo-de-la-casa-del-futuro-que-sera-autoabastecida-por-energias-renovables-y-tendra-tecnologia-anti-desastres-naturales/>  
<https://ecoinventos.com/casa-del-futuro-autosuficiente-piramid-all/>  
<http://www.revistaenergia.com/?p=14579>  
<http://inneuquen.info/nota-principal/piramid-all-es-la-casa-del-futuro-antisismica-eficiente-y-autosustentable-con-energias-renovables-solar-eolica-termosolar>  
<http://www.rionegro.com.ar/propiedades/la-casa-del-futuro-ya-esta-en-neuquen-GF3025239>  
<http://www.apertura.com/realstate/Un-argentino-invento-la-casa-del-futuro-resiste-terremotos-y-es-autosustentable-20180108-0001.html>  
[https://www.youtube.com/watch?time\\_continue=9&v=yJGnawB2IS8](https://www.youtube.com/watch?time_continue=9&v=yJGnawB2IS8)  
( TV Canal 9 de Mendoza )  
, Argentina  
<https://www.pv-magazine-latam.com/2018/02/27/un-ingeniero-argentino-crea-la-casa-del-futuro/>

I estimate that with the arrival of COVID 19, the way of life of society is already changing, fleeing from large cities to rural areas, seeking more security and a better way of life.

**Note: The patent for the "House of the Future", PIRAMID-ALL was recently approved in the USA and in other countries.-**

Regards



-----  
Ing. Civil - Darío R. Martin

**La Pampa -Argentina**





**PIRAMID-ALL**  
Casas del Futuro

## CASA PIRAMIDAL

“GRAN RESISTENCIA A SISMOS y HURACANES , EFICIENTE,  
INTELIGENTE y AUTOABASTECIDA CON ENERGÍA RENOVABLE  
(Solar + Eólica + Termo Solar) “

# BENEFICIOS DE ESTA CASA.

Tiene gran resistencia al sismo y huracanes.

Auto sustentable con energía renovable (Solar + Eólica + Termo solar) y cargador de baterías para vehículos eléctricos.

Gran eficiencia energética.

Estos equipos de energía renovables tienen poco o nulo mantenimiento y una larga vida útil.

Inteligente, con domótica, es la tecnología que convierte la casa en un espacio inteligente y automatizado, capaz de optimizar los recursos energéticos (Internet de las cosas)



Puede estar aislada o conectada a la red eléctrica domiciliaria.

El exceso de energía producida se puede inyectar y vender a la red eléctrica domiciliaria.

No contamina el medio ambiente.

Sencilla, liviana, de rápida construcción y larga vida útil.

Menor costo / m<sup>2</sup>, comparado con la construcción tradicional de mampostería.





# TIPOS DE CASA


**Casa Aislada**  
Zona Rural



**Casa Conectada a Red Eléctrica**  
Zona Urbana – semi Rural



# MODELO DE NEGOCIO

Buscamos empresas constructoras y/o desarrolladoras con buenos antecedentes, respaldo económico y disponibilidad técnica, interesadas en tomar la Licencia de la patente, para poder construir y comercializar llave en mano esta casa  **PIRAMID-ALL** Casas del Futuro en cualquier parte del país.

La patente se encuentra actualmente (concedida), se ofrece una (Licencia / Franquicia) por 2 a 3 años con opción a renovar por 5 años más.

También se pretende concesionar a empresas constructoras en otros países, preferentemente Chile, , Centroamérica, México, USA y Japón, que son los países donde hay más sismos y desastres naturales.

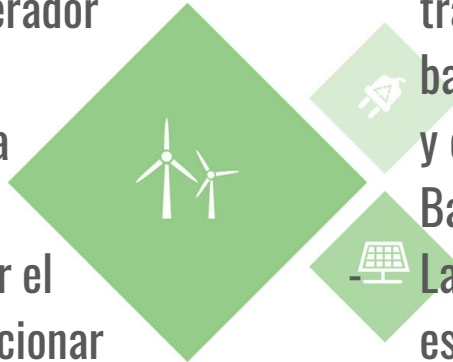




# ENERGÍA RENOVABLE

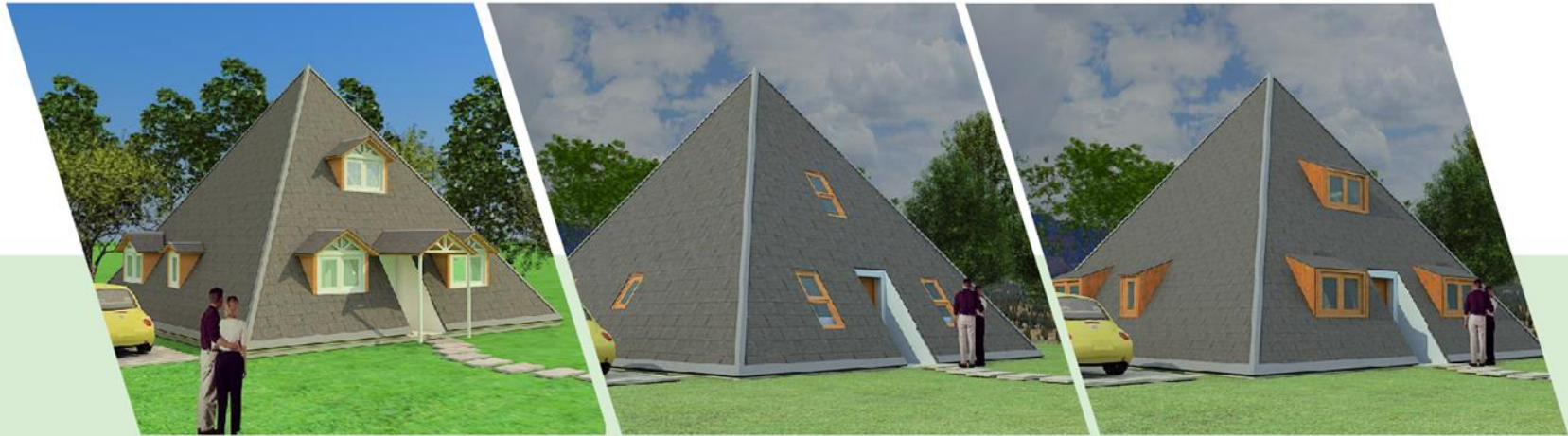
Este proyecto está diseñado con energía (solar + eólica + termosolar) y puede estar aislada o conectada a la red eléctrica domiciliaria. Actualmente, se puede abastecer el total de la demanda media de energía de un hogar tipo de 4 personas, siendo de 7 a 10 Kwh/día,.

- Tiene Paneles solares ubicados en 1, 2 o 3 caras de la pirámide, dependiendo de la energía que se quiera producir, complementado con un aerogenerador eólico en la cumbre del techo.
- Conexión eléctrica para cargar la batería del vehículo eléctrico.
- Termo tanque solar para calentar el agua de uso doméstico y calefaccionar la casa con radiadores o losa radiante.



- El excedente de energía que se produzca y no se consuma, se puede inyectar y vender a la red, transformándose en un prosumidor, bajo la Ley de Generación Distribuida y el Sistema de Facturación de Balance Neto.
- La estructura es metálica/madera y está diseñada para soportar una gran resistencia al sismo y huracanes, la fundación es con vigas y platea de Hormigón Armado.

# TIPOS DE FACHADAS



OPCIÓN 1

OPCIÓN 2

OPCIÓN 3

# TIPOS DE FACHADAS



OPCIÓN 4

OPCIÓN 5

OPCIÓN 6

# TIPOS DE FACHADAS



# PROPUESTA – BARRIO SUSTENTABLE





# MAQUETA





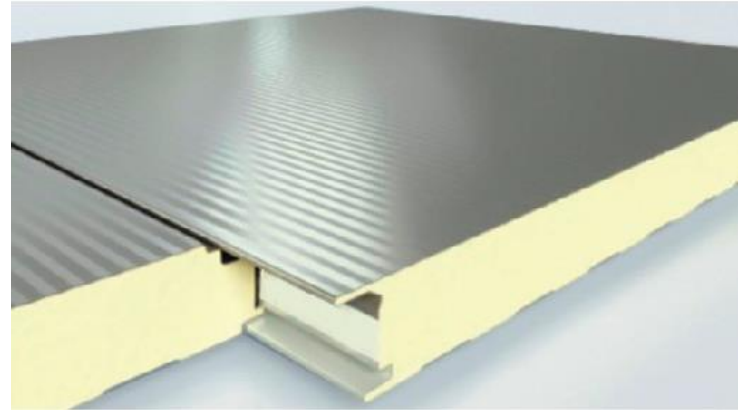
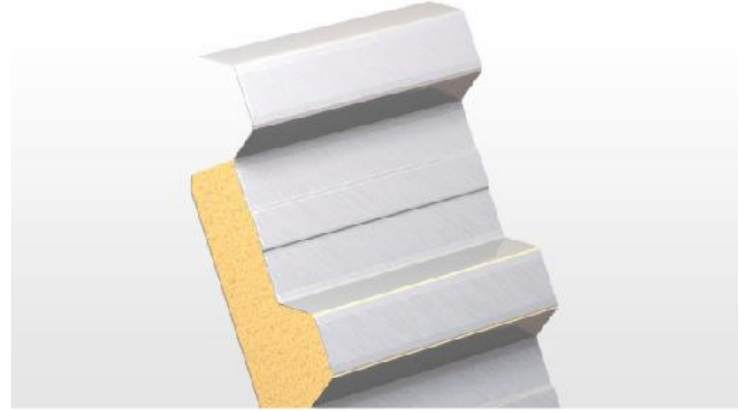
PLANTA BAJA

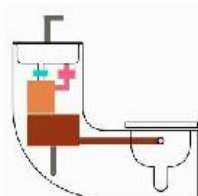


PLANTA ALTA

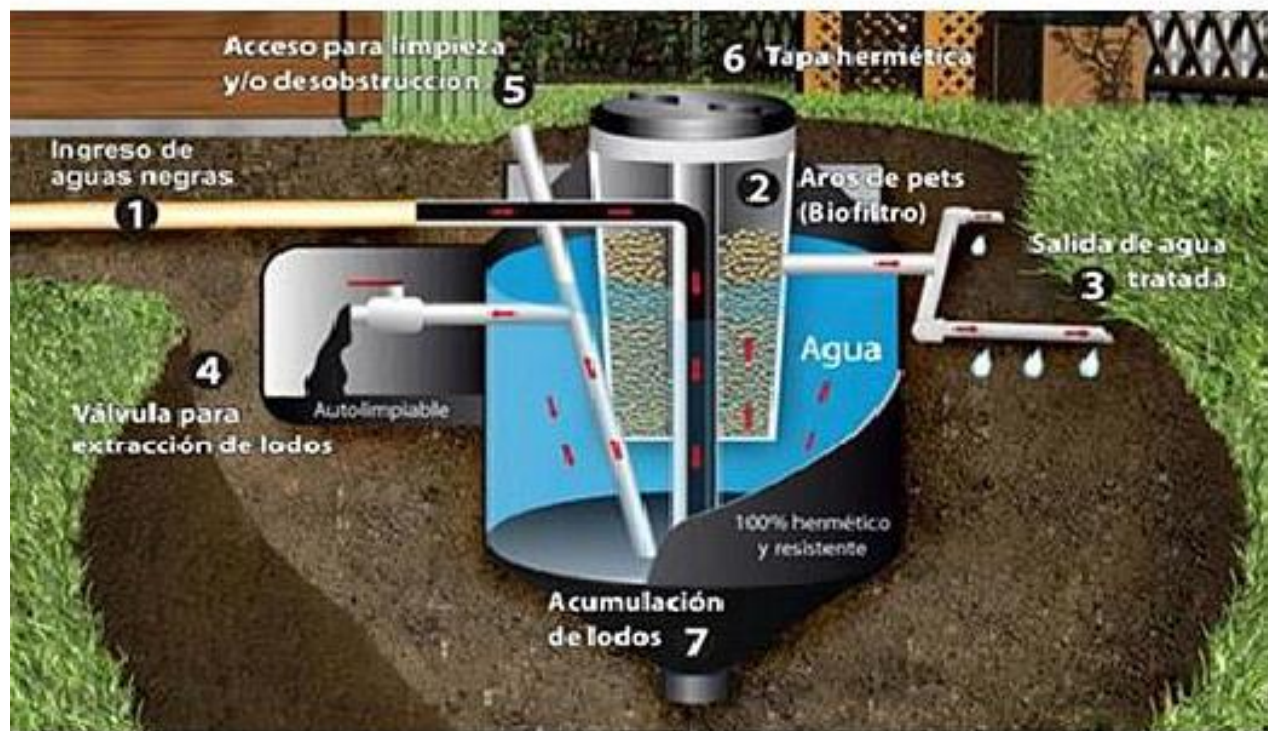


VISTA INTERIOR





- EL AGUA CORRIENTE NO SE DESPERDICIA
- SISTEMA DE FILTRAJE SELECTIVO
- SISTEMA DE TRATAMIENTO DE AGUA
- DEPÓSITO DE TRATAMIENTO
- CISTERNA WC





PIRAMID-ALL

Casas del Futuro

Ing. Civil - Darío R. Martín  
25 de Mayo – La Pampa - Argentina  
Gral Acha 816



[www.piramidall.com](http://www.piramidall.com)





## Helen Selph

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**From:** Newland. Terah [REDACTED]  
**Sent:** Tuesday, August 16, 2022 8:07 AM  
**To:** Climate Action Plan  
**Subject:** SEC Comment Letter On City of Sacramento Preliminary Draft Climate Action Plan  
**Attachments:** Comment on City of Sacramento Draft Preliminary Climate Action Plan 8 15....pdf

Good morning,  
Please find attached a comment letter on the Draft Climate Action Plan July 2022, on behalf of the Sacramento Environmental Commission.

Thank you,

Terah Newland

Administrative Services Officer I

Environmental Management Department

11080 White Rock Rd, Ste 200

Rancho Cordova, CA 95670

[REDACTED]  
[emd.saccounty.net](mailto:emd.saccounty.net)

***For COVID-19 information, guidance and resources, visit [EMD COVID-19 Information](#)***



# SACRAMENTO ENVIRONMENTAL COMMISSION

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Richard Hunn, Vice Chair  
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Eric Rivero-Montes

A JOINT COMMISSION APPOINTED BY:  
County of Sacramento  
City of Sacramento  
City of Folsom  
City of Elk Grove  
City of Galt  
City of Isleton

August 15, 2022

Greg Sandlund  
Planning Director  
City of Sacramento  
915 I Street Sacramento, CA 95814  
Via E mail: CAP@cityofsacramento.org

Subject: Sacramento Environmental Commission (SEC) Comments on the City of Sacramento Public Review Draft Preliminary Climate Action & Adaptation Plan (Preliminary CAAP)

Dear Mr. Sandlund,

The Sacramento Environmental Commission (SEC) submits the following comments on the Public Review Draft Preliminary CAAP. The SEC met on August 15, 2022 to discuss and approve submitting these comments.

Overall, we applaud the Preliminary CAAP intent and goals and support its adoption and implementation. We believe that while the Preliminary CAAP provides a framework and strategy for moving toward selecting appropriate greenhouse gas (GHG) reduction measures, it fails to cross the gap between identifying possible measures, developing and funding an implementation plan that will result in reducing such emissions.

Further evidence is needed to demonstrate that the proposed measures can be feasibly implemented and successfully reduce GHG emissions to achieve the goals addressed in the CAAP. The City should proceed to prepare implementation plans for these measures, in a manner similar to the City's recent actions to eliminate natural gas use in new construction (Measure E-2), or reduce methane emissions from organic waste (Measure W-1).

The SEC noted several items that warrant further consideration in the Preliminary CAAP including:

1. Measure TR-1 of the CAAP promotes the development of new bikeways and expanded pedestrian infrastructure and network. This measure, however, must consider the associated need to provide the public a safe mode for travel with sufficient lighting, adequate emergency communications, and nighttime security. The increased reliance of bikeways as a commuter alternative must include safety and security measures to encourage nighttime and winter use.

2. Measure TR-2 supports public transit improvements to achieve a greater transit mode share that would substantially reduce vehicle miles traveled (VMT). However, Measure TR-2 fails to consider increased public subsidies of the regional transit system to encourage ridership by all members of the public. A reduction or elimination of transit fares can potentially increase ridership by eliminating a financial obstacle to using the existing system. Such a measure would substantially assist underserved and low-income neighborhoods where public transit could have a significant benefit.
3. The CAAP fails to consider the elimination of gas-powered landscape equipment which is recognized as a significant unregulated source of air pollutant emissions. The SEC recommends including an aggressive measure to replace City-owned equipment and trade-in existing gas-powered equipment operated by local landscaping businesses and replace them with zero-emission leaf blowers and mowers.

This measure could be similar *Measure GHG-09, Trade-In GHG-Emitting Landscaping Equipment* being considered in Sacramento County Draft Climate Action Plan. The SEC is encouraging both the City of Sacramento and Sacramento County to immediately initiate Measure GHG-09 because it can effectively reduce GHG emissions from this unregulated emission source.

4. The Preliminary CAAP should include an additional measure to increase incentives to remove existing high-maintenance and water intensive landscaping with drought-tolerant and lower maintenance landscapes. Expansion of the existing landscape replacement program, along with improved public outreach could substantially contribute to reducing GHG emissions resulting from landscape equipment, fertilizers, and water demand.

We do not believe artificial turf is a satisfactory alternative to replace water intensive landscaping. The rubber and plastic materials used in its manufacturing also contributes to GHG emissions.

5. The Preliminary CAAP does recognize the role that carbon sequestration and protection of green-spaces in public places can play to remove GHG from the atmosphere. With implementation of Measures MM-6 and CS-1, the Preliminary CAAP anticipates a near-term reduction of 23,053 MT CO<sub>2</sub>e by 2030. However, successful sequestration requires a long-term commitment to manage and maintain the urban tree canopy well beyond the 2045 time planning horizon. The Preliminary CAAP should include additional actions to achieve the sequestration goals through year 2100.
6. Finally, the Preliminary CAAP should include a measure reducing the use of single-use plastic products at both City facilities as well as local businesses. These production, transportation, and refinement of these products results in GHG emissions emanating throughout their production cycle. Reduced usage can substantially reduce GHG emissions as well as avoiding other environmental impacts. Numerous California communities have already implemented measures to reduce use of single-use and other plastic products. Such measures can be easily identified without extensive study or research.

The SEC appreciates the opportunity to submit these comments. If you have any questions regarding these comments, please contact SEC Secretary Jill Koehn at (916) 875-8584.

Sincerely,



Mark White  
SEC Chair



Richard Hunn  
SEC Vice Chair