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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 and developing 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 CO₂e 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