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Transmitted via email to ClimateActionPlan@saccounty.net on 10/5/2021

October 5th, 2021

Sacramento County, Office of Planning and Environmental Review
Attention: Todd Smith, Principal Planner
827 7th Street, Room 225,
Sacramento, CA 95814

Subject: Sacramento Environmental Commission Comments on the Sacramento County Final Draft Climate Action Plan

Dear Mr. Smith,

The Sacramento Environmental Commission (SEC) appreciates the opportunity to review and submit comments on the Final Draft Climate Action Plan (CAP). The SEC met on October 4th, 2021, to discuss and approve submittal of the following comments.

The SEC considers the final draft CAP to be complete but finds that further detailed information is needed. At this time, the CAP consists of a framework and list of actions that the County could implement to reduce these emissions.

For the listed actions to be considered feasible and achievable, information including an action's cost, effectiveness, sources of funding, and the legal and institutional basis for implementation must be determined. Specifically, implementation plans for each CAP action should illustrate how the action will be implemented, who will be responsible for implementation, and what performance measures or standard will determine success. This information would provide substantive evidence consistent with CAP content criteria described in §15183.5(b)(1)¹ of the Guidelines for Implementation of the California Environmental Quality Act.

The SEC recommends that the County immediately proceed to develop implementation plans to determine each action's feasibility and effectiveness. CAP actions should be implemented independently to enable completion of less-complex actions at the earliest practicable date. Government-operations actions should also be implemented as soon as practicable, as allowed by budgetary limits.

Finally, we agree with preparation of a proposed CAP update to achieve the goals of the Sacramento County December 2020 Climate Emergency Declaration. The update should be completed as soon as practicable because further delay will substantially impede meeting the 2030 carbon net neutrality goal.

1 California Code of Regulations Title 14. Natural Resources Division 6. Resources Agency. Chapter 3: *Guidelines for Implementation of the California Environmental Quality Act as amended December 28, 2018.* Section 15183.5(b) Plans for the Reduction of Greenhouse Gas Emissions.

The SEC applauds the efforts of the County to reduce GHG and carbon emissions. As we are all aware, climate change is real and the resulting increases of flooding potential, fire hazard, and sea level rise will have a significant impact on Sacramento County residents and environment. The successful completion of the CAP and subsequent implementation plans will be a key step toward achieving the goals expressed by the Board of Supervisors Climate Emergency Declaration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark White', written in a cursive style.

Mark White, SEC Chair
Sacramento Environmental Commission