

**COUNTY OF SACRAMENTO  
CALIFORNIA  
PLANNING COMMISSION REPORT**

**ADDENDUM**

For the Agenda of:  
October 25, 2021

To: Planning Commission

From: Planning and Environmental Review

Subject: PLNP2016-00063. Sacramento County Climate Action Plan.  
APN: Countywide. Environmental Determination: Addendum  
to the Sacramento County General Plan Update Final EIR

Supervisorial  
District(s):

All

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## **Introduction**

This addendum has been prepared in response to comments received on the Draft Climate Action Plan. It provides clarifications, lists expected corrections, addresses disagreement regarding CEQA compliance, and provides a short summary and response regarding the main categories of comments.

## **Clarifications**

### **Carbon Neutrality**

The CAP contains a GHG reduction strategy option that would set a 2030 Carbon Neutrality target, consistent with the County's Climate Emergency Resolution (See CAP Appendix F, Section F.1.2). This strategy option was also analyzed for environmental impacts as part of the associated CEQA document (See EIR Addendum Section 4.2, Strategy Option 2). The Planning Commission and Board of Supervisors could approve the current CAP, with this strategy option selected to set a carbon neutrality target.

### **Carbon Farming**

Comments received questioned the feasibility and scale of this GHG reduction measure (GHG-01). Carbon Farming involves the implementation of agricultural practices to enhance the capacity for soils and plants to capture carbon dioxide from the atmosphere. These techniques were identified as opportunity areas by SMUD in 2017 as part of a Sacramento County Landscape Carbon Assessment. That study found that 278,000 Metric Tons of Carbon Dioxide Equivalents (MT CO<sub>2</sub>e) could be achieved by simply transitioning half of the County's farmland from synthetic to organic fertilizer. CAP measure GHG-01 included this nutrient management strategy on an accelerated timeline, plus other crop management techniques to achieve reductions of 377,692 MT CO<sub>2</sub>e.

### **Streamlining**

The CAP establishes a unified and cohesive program of comprehensive GHG reduction measures that must be implemented when projects use the streamlining function (See CAP Consistency Checklist). Streamlining does not mean that no further environmental review or mitigation occurs for subsequent development. Streamlining applies only to a project's CEQA GHG analysis; no other CEQA topical areas are streamlined or otherwise eliminated from consideration as part of a "qualified" CAP. Development projects must still seek County approvals for necessary land use entitlements, perform environmental analyses consistent with CEQA, and demonstrate consistency with policies in the General Plan including LU-119, LU-120, and recently adopted significance thresholds for Vehicle Miles Traveled.

### **The CAP Will Be Updated**

Once adopted, County Departments will begin implementation. However, the CAP is living document - it will continue to evolve over the next several years in response to its observed performance and adoption of other climate-related

plans within and outside of the County. The CAP states that an update will occur in 2024-2025 (See Section 4) to coincide with initiation of an update to the County's General Plan, release of California's 2022 Climate Change Scoping Plan, and in response to the Natural and Working Lands Climate Smart Strategy.

### **The CAP Will Not Change the General Plan**

There are no proposed changes to current General Plan policies in the CAP. Comments received suggest that the CAP should modify the Circulation and Land Use elements of the General Plan to restrict the development of single-family homes to infill areas only. The CAP is not a growth management tool like the General Plan. The CAP is a mitigation measure of the adopted General Plan; therefore, it is designed to support existing General Plan policies and ensure that allowable uses include GHG reducing design features and measures.

### **No Action Alternative**

Several comments noted that having no CAP is better than the one that is being proposed. A "no action" alternative was discussed as a possible strategy option with the CAP stakeholder group prior to preparation of the Final CAP and EIR Addendum. Upon further evaluation, it was determined that this approach was not consistent with the intent of County's adopted Climate Emergency Resolution and General Plan EIR Mitigation Measures CC-1 and CC-2. While it is preferable to begin reducing GHG emissions as soon as possible, an adaptation-only climate strategy was included as an option in the CAP (Section F.1.4) and EIR Addendum (Section 4.4). This option would adopt the adaptation portion of the CAP now to begin protecting County residents immediately against the anticipated impacts of climate change.

### **Expected Corrections**

Staff has identified the following corrections that will be made to the Final CAP.

- Update GHG-23 implementation actions with language from target indicator section and make the target indicator more robust.
- Remove Easton and Cordova Hills from Table 4. Easton is identified in the Housing Element as an Infill Project. Cordova Hills' Development Agreement limits the County's ability to impose the infill fee on Cordova Hills.
- Update GHG-05, last sub-bullet to include all the exemption types listed in the previous four sub-bullets.
- Correct the 16% reduction referenced in Appendix E to 34%. This does not change any numbers, it is a correction to a previous version that was missed at final publication.
- Update the CAP Consistency Checklist (Appendix I, Page I-5) to reflect the correct GHG-06 requirements. Changes to the Consistency Checklist depend on whether the current GHG-06 point-of-sale measure remains as written, or is modified as a result of public comments and the Planning

Commission's recommendation.

- Revise Measure Flood-02 to include benefits language suggested by Regional San and SASD in their comment letter.

## **Disagreement Regarding CEQA Compliance**

Several comment letters suggest that an Addendum to the General Plan EIR was not the appropriate CEQA document to use for the CAP and an EIR should have been prepared instead. As explained in the introduction to General Plan Update EIR Addendum prepared for this CAP (Section 1.2 Addendum Analysis), the use of an addendum is consistent with State laws pertaining to CEQA and the CAP's status as an implementation measure for the County's adopted General Plan.

## **Summary and Response to Main Categories of Comments**

One set of comments appearing to share a similar form and structure indicated that the CAP should contain more aggressive GHG reduction measures and set a 2030 carbon neutrality target. For the most part, these comments do not appear to consider the four Strategy Options that staff developed based on similar comments received earlier in the focused stakeholder process. For example, many comments suggested it necessary to set a 2030 carbon neutrality target but did so without reference to Strategy Option #2 which does that. Other comments suggested the CAP should focus more on infill development opportunities and discourage greenfield "sprawl" developments, but did not address Strategy Options #1 or #3. These options were developed to provide a framework for these critical policy discussions and were fully evaluated in the General Plan EIR Addendum prepared for this CAP. This enables the public, Planning Commission and Board of Supervisors to carefully weigh the environmental, economic, and policy considerations surrounding each Strategy Option as well as the CAP as proposed.

Another set of comments appeared to contain more individualized and focused feedback regarding specific implementation measures and possible interpretations of proposed policies. These included comments regarding carbon farming, VMT reductions and banking, offset programs, the infill fee, and economic feasibility. Staff has been continuing discussions with commenters and expects ongoing dialogue as part of adoption and implementation of the CAP.

While staff acknowledges the need for ongoing dialogue and refinement of some measures through the public process, the matter remains urgent and it is important to put the CAP in place now. Maintaining a qualified CAP means that the County has committed to update the CAP through a robust and transparent process to make it even more effective and adaptable as we move towards a carbon-neutral 2030.