

Responses to Public Comments Received Preliminary Public Review Draft Climate Action Plan

The City received 348 pages of public comments on the Preliminary Draft Climate Action Plan that was released on July 1, 2022. To facilitate the review of the City’s responses, the table below summarizes key public comments by topic, and the City’s responses to them.

Topic	Summary of Comment	City Response
Adaptation	This draft does not address adaptation.	The Preliminary Public Review Draft CAP that was released in July 2022, did not include Chapter 7 (Adaptation), which was released for preliminary public review in October 2022. These topics are covered in the Vulnerability Assessment and Chapter 7 (Adaptation). Following receipt of public comment and associated revisions, the full Climate Action & Adaptation Plan, including Chapter 7, will be released for full public review in early 2023.
Adaptation	<p>CAP does not recognize the importance of using water resources efficiently as a key climate adaptation strategy to drought.</p> <p>CAP should include a city-wide Landscape Climate Adaptation Program to educate and assist citizens and business in converting landscapes to low water use.</p> <p>CAP does not address impacts of drought on hydroelectric generation, food availability and prices, wildlife, and basic water needs for continued development.</p>	
Adaptation	Consider measures to increase high albedo surfaces such as cool roofs and walls.	
Adaptation	The CAP should include actions to support shade trees, solar panel shading, and other infrastructure to make active transportation more comfortable.	
Adaptation	Stop new construction in high flood risk areas and relocate to higher ground or require Delta basements.	

		to mitigate flood risk. These reduction tools include land use planning, emergency management, levee improvements, and the National Flood Insurance Program (NFIP)/Community Rating System (CRS).
Accelerating Carbon Neutrality/ Quantifying Measures	Carbon Neutrality targets should be accelerated to 2030.	City Council held a workshop on accelerating carbon neutrality on August 16, 2022. After considering public comments and information provided, City Council discussed City-led efforts to address climate change, acknowledging the challenges while continuing to accelerate where feasible, and integrating climate across related priorities, including housing. Funding was discussed as a key issue for climate action. –The City is committed to move as fast as feasible, continuing to advance rapid action with available resources. While the City Council did not direct staff to accelerate carbon neutrality targets at this time, City Council did acknowledge the urgency of climate change, the need for collaborative solutions, and the importance of external and creative funding options.
Accelerating Carbon Neutrality/ Quantifying Measures	Draft does not match ambition of City's other climate goals. City role insufficient and overly reliant on partners.	<p>The City plays a significant role reducing greenhouse gas (GHG) emissions. The Climate Action Plan (CAP) establishes critical policy and regulatory tasks, while also outlining the programmatic and infrastructure work that is needed. However, the City cannot solve the climate crisis alone. Achieving climate goals will require the active engagement and participation of other agencies, residents, and businesses. The CAP reflects this reality, while still identifying critical actions for the City.</p> <p>To comply with California Environmental Quality Act (CEQA) guidance, the City's CAP includes measures and strategies supported by case studies, evidence, and technical reports. Other CAPs may outline ambitious goals but may lack evidence to support the quantification of GHG reduction credits. CAP Appendices C and F₇ provide substantial evidence that the GHG reductions of quantified actions are based on studies and examples that indicate that GHG reductions can be achieved.</p>

		The City's authority has limits, so it must rely on partners such as Sacramento Municipal Utility District (SMUD), Sacramento Regional Transit (SacRT) and the State of California to implement actions that the City does not control, such as energy, public transit, and State buildings and vehicle fleets. The CAP depicts this context. The City will only successfully achieve CAP goals with the strong support and active engagement of regional and local partners.
Accelerating Carbon Neutrality/ Quantifying Measures	Should the City claim GHG reductions of SMUD's Zero Carbon Plan? How is this quantified?	Community-wide GHG emissions in the CAP include GHG emissions from community electricity use. SMUD's decarbonization of the sources of electricity will reduce the GHG emissions associated with electricity use in city limits. Therefore, the CAP includes credits from SMUD's Zero Carbon Plan. Inclusion of credits from cleaner sources of power is consistent with standard methods used in other CAPs and by the State. Quantification details for SMUD's Zero Carbon Plan can be found in Appendix C.
Accelerating Carbon Neutrality/ Quantifying Measures	Can you clarify this performance indicator? "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)	The performance indicator for TR-3: "28% ZEV registrations by 2030" means that 28% of all autos on the road and registered in Sacramento in 2030 will be Zero Emission Vehicles (ZEV). The CAAP will be revised to clarify this.
Accelerating Carbon Neutrality/ Quantifying Measures	More air quality monitoring is needed in low-resource areas of Sacramento to be certain we are reaching our GHG-reduction goals equitably.	The City coordinates with the Sacramento Metropolitan Air Quality Management District (SMAQMD), the agency responsible for monitoring air quality. The City and SMAQMD are partnering on a air quality monitoring pilot, to increase air quality monitoring in underserved areas of Sacramento. Supported with City funding, this pilot is placing over 100 air quality sensors at residences, businesses, schools, and buildings. More information is available at cityofsacramento.org/air-quality . This pilot will be an important step to evaluate future opportunities for air monitoring. Additional policies and guidance for the City's role in air quality monitoring are forthcoming in

		<p>the draft Environmental Justice Element of the 2040 General Plan.</p> <p>In Sacramento, most air quality issues come from emissions from gas-powered vehicles in areas adjacent to major roads and freeway. As Sacramento transitions to ZEVs, air quality near freeways, highways, and major roads will improve.</p>
Accelerating Carbon Neutrality/ Quantifying Measures	Draft lacks substantial evidence.	Substantial evidence is provided in Appendix C (Community Measures) and Appendix F (Municipal Measures) for GHG reductions that are quantified and credited toward achieving GHG reduction targets. The City will conduct a review of the Climate Action and Adaptation Plan pursuant to CEQA Guidelines section 15183.5, as part of the Master EIR process, that will identify and rely on substantial evidence for its conclusions.
Accelerating Carbon Neutrality/ Quantifying Measures	CH ₄ and N ₂ O and CO ₂ emissions are important GHGs and should not be ignored.	The CAP uses MTCO ₂ e (metric tons carbon dioxide equivalent) for measurement of GHG emissions. MTCO ₂ e is a standardized measure used to compare the emissions from various GHG on the basis of their relative global warming potential by converting amounts of other GHGs to the equivalent amount of carbon dioxide with the same warming potential. The GHG inventory in the CAP includes these GHG emissions, but all gases have been converted into the common metric of MTCO ₂ e.
Accelerating Carbon Neutrality/ Quantifying Measures	City should take more direct action rather than relying on partners like SMUD.	The CAP includes community-wide GHG reductions and GHG reductions specific to City operations (Chapter 10). SMUD provides electricity within city limits, and partnership with SMUD is critical for the success of the CAP.
Funding and Implementation	<p>There is no funding plan for the CAAP and the Funding and Financing Strategy in Appendix D does not include details to show how each measure will be funded or identify funding sources for the CAAP.</p> <p>The City's Climate Office is understaffed and underfunded. Appendix D of the CAAP states</p>	The CAAP is a comprehensive roadmap for future action, and the Funding and Financing Strategy in Appendix D is a first step to outline new potential funding sources that could augment existing City resources. The analysis of high-cost measures in Appendix D provides a starting point to determine and plan for future opportunities. Staff will continue to evaluate feasible opportunities and seek more resources, consistent with direction in the CAAP and Climate Implementation Work Plan tasks,

	that at least six new staff positions will be needed. The final draft CAAP should be accompanied by an actionable proposal for the necessary staffing and financial resources to implement the CAAP.	working with City Council and the City Manager. Local options for new funding for the CAAP may be impacted by other local and regional initiatives currently underway.
Funding and Implementation	Continue to regulate new development and bring back the CAP checklist.	The Community Development Department will consider bringing back the CAP Checklist after the CAAP is adopted.
Funding and Implementation	CAAP lacks sufficient details regarding how measures will be implemented.	The CAAP is a comprehensive roadmap for future action by the City and its partners. The level of detail in the CAAP is typical for climate action plans. The CAAP provides direction for more specific efforts, such as the Existing Building Electrification Strategy and the Transportation Priorities Plan. More information about specific efforts can be found on the City’s webpage. Implementation of CAAP measures will vary by measure, but in many instances will require additional plans, funding strategies, or program design prior to implementation. The intent of the CAAP is to serve as a comprehensive roadmap for the City’s climate goals, with key metrics, approaches, strategies. The CAAP does not include the detailed implementation plans for all the diverse strategies necessary to achieve carbon neutrality, but CAAP will be updated and adaptively managed with more work to follow.
Funding and Implementation	Insufficient accountability: As proposed, the Implementation and Monitoring proposal does not lay an adequate foundation to ensure accountability. 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.	In 2020, the City Manager appointed a citywide Climate Action Lead as the centralized point of responsibility for the City’s climate efforts, providing ongoing leadership and accountability with the newly formed Office of Climate Action and Sustainability. The office is responsible for quarterly climate updates to the City Council, and works collaboratively with City departments to ensure implementation of City Council’s climate goals. In addition, with the exception of projects from the Local Hazard Mitigation Plan in Chapter 7 (Adaptation), the Community Development Department (CDD) will monitor implementation of the CAAP and related 2040 General Plan implementing actions incorporated into CAAP

		Chapter 7. CAAP Chapter 10 outlines how CAAP actions will be monitored and how often. Staffing levels were taken into consideration to allow bandwidth for CDD staff to implement CAAP actions.
Funding and Implementation	The CAP lacks sufficient details regarding specifics about how measures will be implemented.	The CAAP is a roadmap for future action by the City, and provides direction for more specific efforts, such as the Existing Building Electrification Strategy and the Transportation Priorities Plan. More information about specific efforts can be found on the City's webpage (see also topic specific sections of this document for direct links).
Funding and Implementation	Need clearly understandable goals and a public dashboard to track them.	The CAAP will have a community dashboard that is clearly understandable.
Building Electrification	Action should be accelerated, especially for existing building electrification.	Converting existing buildings to all-electric is a major undertaking, and the City is committed to centering equity in the process. The Existing Building Electrification Strategy will remain aligned with the CAP targets and aims to provide a pathway to electrify the City's existing building stock of more than 200,000 buildings as quickly as is feasible within the context of available resources and evolving technology.
Building Electrification	The Existing Building Electrification Strategy should include mandatory permit certification at time of sale to enforce permit compliance and 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.	Thank you for your support and suggestions. The City will consider this input as staff continue work to develop strategies and actions for Existing Building Electrification.
Building Electrification	Reducing GHG through electrification of existing buildings should be more thoroughly presented, including	The City is currently in the process of developing a strategy for the electrification of existing buildings and will continue to engage the community in this process. The goal of the

	financial impacts on lower income individuals and businesses.	Existing Building Electrification Strategy is to advance the health, safety, comfort, and climate benefits of electrification for all people in Sacramento. To achieve this vision, the policies in the Strategy will ensure equitable access to affordable and reliable energy, easy and affordable installation, holistic building improvements and culturally competent outreach and education. The Strategy will also support City and regional efforts to avoid displacement for households and businesses and prioritize low income and under resourced communities and small businesses.
Building Electrification	Support new and existing building electrification. Want to see exemptions limited.	City Council will consider the readoption of the New Building Electrification Ordinance in late 2022 to align with the 2022 California Building Standards Code. The Ordinance will require all new buildings three stories or less to be fully electric beginning in 2023 and all new buildings of any size to be fully electric beginning in 2026. Implementation of the Ordinance will include limited exemptions, as well as an Infeasibility Waiver process. More information about New Building Electrification can be found on the project webpage .
Building Electrification	Create youth climate corps to support implementation of Measure E-3 through education and installations.	Workforce and educational opportunities will be considered in the City’s forthcoming Existing Building Electrification Strategy, for recommendation to the City Council. The City is also preparing to launch a Notice of Funding Availability (NOFA) requesting community-based workforce projects. The purpose of the NOFA is to create a paid youth job corps training experience to help address food insecurity, COVID recovery, and climate-related workforce pathways. The projects will be funded from a portion of nearly \$7 million that the City received from the CaliforniansForAll Youth Workforce Grant. The funding may provide an opportunity for a youth workforce training program similar to the climate corps model. However, licensed contractors are generally needed to retrofit buildings and the specifics depend on the proposals that are received.

<p>Building Electrification</p>	<p>Support for CAP measure E-3 to transition existing buildings to all-electric and highlights key challenges for E-3.2 (developing Ord. for existing buildings).</p> <ol style="list-style-type: none"> 1) Cost of upgrading electrical panels. 2) Statewide shortage of plumbing contractors that have HPWH experience. 3) Lack of manufacturing capacity to meet statewide demand. 4) Recommends that the City should have an online inspection program for HPWH. 	<p>Thank you for your comments and support. Opportunities and challenges for existing building electrification will continue to be evaluated in the forthcoming Existing Building Electrification Strategy.</p>
<p>Building Electrification</p>	<p>Ensure that building electrification measures are collaborative, transparent, and benefit/do not burden homeowners.</p>	<p>Thank you for your comment. The City is currently developing the Existing Building Electrification Strategy, which is guided by a set of equity criteria which were written with community input. There will be additional opportunities to provide input on the strategy before it is finalized. Please visit the project webpage for more information.</p>
<p>Urban Forest/ Land Use</p>	<p>The CAP references the Urban Forest Plan—when will it be released?</p>	<p>The Urban Forest Plan is anticipated to be released with the full Public Review Draft 2040 General Plan and Climate Action & Adaptation Plan in early 2023.</p>
<p>Urban Forest/ Land Use</p>	<p>The CAP fails to show long-term commitment to maintaining tree canopy beyond 2045.</p>	<p>The CAP is a GHG mitigation plan to achieve carbon neutrality by 2045. It must rely on the details to be found in other City plans such as the forthcoming Urban Forest Plan and the Parks Plan 2040.</p>
<p>Urban Forest/ Land Use</p>	<p>Except Measure E-5 (infill), there are no connecting land-use guidelines.</p>	<p>The 2040 General Plan (Land Use Element) will provide goals, policies, and implementing actions related to land use.</p>
<p>Urban Forest/ Land Use</p>	<p>Overreliance in CAAP on yet to be adopted plans (General Plan, Urban Forest Plan).</p>	<p>The CAAP is a roadmap, and it is appropriate for it to rely on specialized plans (some of them yet to be adopted) such as the Urban Forest Plan for actions that the City will implement between now and 2045.</p>
<p>Urban Forest/ Land Use</p>	<p>Comment against up-zoning and in support of preservation of open space.</p>	<p>Thank you for your comment. The forthcoming draft 2040 General Plan will include policies that reflect the City Council’s direction, to accommodate a range of housing types while protecting natural resources.</p>

<p>Urban Forest/ Land Use</p>	<p>Questions infill and densification as a GHG reduction measure, since the CAAP does not show GHG emission reductions from it.</p> <p>Supports less intense infill that retains space for tree canopy rather than increasing density.</p> <p>Concerned that implementation of CAP measures in Sacramento will negatively impact property values and marketability of homes in Sacramento.</p>	<p>GHG reductions from infill development is quantifiable. For example, the quantified GHG reduction in Sacramento's 2012 Community Climate Action Plan from compact growth anticipated from the 2030 General Plan was 51,507 MMTCO₂e/year. This CAAP took a different approach by accounting for Vehicle Miles Traveled (VMT) reductions in the forecasts for the General Plan/CAAP and attributing them to the transportation sector to avoid double-counting.</p> <p>CAP Measure E-5 calls for supporting infill growth with the goal that 90% of new growth occur in the established and center/corridor communities and 90% small-lot and attached homes by 2040, consistent with the Regional Sustainable Communities Strategy that is led by SACOG. The City's development standards include residential open space requirements (i.e. maximum lot coverage and minimum setbacks). The forthcoming Draft 2040 General Plan and Draft Sacramento Urban Forest Plan will have policies and implementing actions related to retaining and increasing the tree canopy.</p> <p>CAAP recommendations will reduce GHG emissions and improve air quality which are vital to Sacramento's quality of life. Staff is not aware of evidence to suggest that infill housing development reduces property values.</p>
<p>Urban Forest/ Land Use</p>	<p>Sacramento's tree canopy must be adequately supported by current city policies to result in attaining carbon sequestration goals.</p>	<p>The goals, policies, and implementing actions to support Sacramento's urban forest will be included in the Urban Forest Plan and the Parks Plan 2040, which will both be released concurrent with the release of the 2040 General Plan and CAAP in early 2023.</p>
<p>Urban Forest/ Land Use</p>	<p>Address habitat benefits of native trees in CS-1.3.</p> <p>In CS-1.4, reference Sac Tree Foundation's tree list.</p>	<p>It is anticipated that native trees will be included in online educational materials about tree species that are adapted to Sacramento's climate, as recommended in CS-1.3. The Sacramento Tree Foundation's tree list can be considered. These details may be driven by recommendations in the Urban Forest Plan, which is scheduled for public release in early 2023.</p>

Urban Forest/ Land Use	Explain how compost and mulch around City trees will increase carbon sequestration (CS-1.2).	Studies have shown that mulch and compost increase the ability of soil microbes to sequester carbon. Mulch and compost increases soil health and provides the environment and nutrition for microbes to grow, and these microbes sequester carbon in the soil from photosynthesis.
Urban Forest/ Land Use	Protect and restore native grasslands as carbon sinks.	While it is true that native grasslands can act as carbon sinks, this action would be more appropriate for a rural jurisdiction than a city that is built out.
Urban Forest/ Land Use	Concern about loss of tree canopy due to new development and loss of space for trees in single-family neighborhoods due to ADU's. Fundamental disagreement with the CAAPs unstated assumption that the canopy goals can be achieved absent a major reform of Urban Forestry.	The City's development standards include residential open space requirements (i.e. maximum lot coverage and minimum setbacks). The forthcoming Draft 2040 General Plan and Draft Sacramento Urban Forest Plan will have policies and implementing actions related to retaining and increasing the tree canopy
Urban Forest/ Land Use	Set separate goals for City and private tree canopy and provide more detail on how to increase each. Focus City tree plantings in heat islands.	The forthcoming Draft 2040 General Plan and Draft Urban Forest Plan will include goals, policies, and implementing actions related to maintaining and increasing the city's tree canopy.
Urban Forest/ Land Use	Supportive of density as a tool to avoid sprawl and protect tree canopy. Supportive of development of long-term existing building electrification strategy that includes assistance for low-income households. Supportive of Neighborhood Coalition's transportation comments and EV charging and active transportation infrastructure improvements in low-income areas.	Thank you for your comments, which reflect multiple measures and actions currently included in the draft CAAP, including recommendations such as E-3.2, which the City is actively working towards as it formulates an Existing Building Electrification Strategy.
Transportation	Support additional subsidization of transit passes.	The City was the original partner to fund SacRT's RydeFree program to subsidize youth transit ridership and continues to fund the program so that Sacramento students can ride transit for free. Public transit and the price of transit

		passes is under Sacramento Regional Transit’s control. Additional contributions by the City to subsidize transit passes is the prerogative of City Council, but since discretionary funds are limited, this would mean that the funding could not be used for other programs.
Transportation	Increasing housing density without increasing transit and active transportation and local availability of goods/services won't reduce VMT.	Substantial evidence to show that CAAP measures to support public and shared transit improvements and active transportation infrastructure reduce VMT to provide 10% of the CAP's GHG reduction is provided in Appendix C. Infill housing development brings more people closer to goods and services and supports public transit and active transportation. In particular, infill development within existing urban areas that are largely developed reduces VMT by situating new development within shorter distances of jobs and services.
Transportation	Lacks sufficient emphasis on transit, active transportation, and EV charging.	<p>CAP Measures TR-1, TR-2, and TR-3 specifically address transit, active transportation, and EV charging, with 30 separate actions identified to support these three measures.</p> <p>SacRT is the agency responsible for the public transit system. The City's role is to support improvements such as changes to traffic signals to prioritize transit, and other technological or infrastructure enhancements based on SacRT needs.</p> <p>CAP actions include implementing the Bicycle Master Plan and Pedestrian Master Plan. In 2021, City Council adopted an Ordinance increasing EV charging infrastructure requirements for new development. The City also supports EV charging through public-private partnership for services like curbside fast charging, and the provision of free EV charging at numerous City facilities.</p>
Transportation	TR-1: Active Transportation: Prioritize active transportation infrastructure at the top of the transportation pyramid as recommended in the MCCC Final Report. Road characteristics and policies need	The CAP prioritizes active transportation with five supporting actions, including implementing the Bicycle Master Plan, which is identified as a funding priority, consistent with MCCC recommendations. The CAP mode share targets are set at a level that could be substantiated to

	<p>to change in tandem.</p> <p>Policy needs to back those changes and funding must be tied to it.</p>	<p>be achievable (see Appendix C) and meet climate goals.</p> <p>The Mobility Element of the Draft 2040 General Plan will provide additional goals and polices related to mobility.</p>
Transportation	<p>TR-2: Transit: The plan sets a transit goal of 11%, one-fifth of that in the Mayors Climate Change Commission (MCCC) recommendations.</p>	<p>The CAP transit goal mode share was set at a level that could be substantiated to be achievable (see Appendix C) while meeting climate goals.</p>
Transportation	<p>TR-2 and TR-1 vs. TR-3: 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.</p>	<p>The CAAP is consistent with MCCC recommendations to prioritize funding for active transportation. The CAAP identifies the need to prioritize \$510,000,000 to implement the Bicycle Master Plan, and approximately \$1-3 billion to cover the City's portion of costs to fund signal prioritization, bus lanes, bus bulbs, and light rail enhancement in City ROW.</p> <p>With respect to ZEVs, their high priority in the CAP reflects that the majority of travel in Sacramento currently occurs by car. Therefore, the largest GHG reduction can be achieved by transitioning to ZEVs.</p>
Transportation	<p>Transportation, including the use of public transport and electric vehicles to reduce GHG, must be more fully presented.</p>	<p>The City defers to SacRT regarding details about future public transit improvements needed to provide frequent reliable transit.</p> <p>The City has numerous other initiatives to more fully plan for EVs, including an Electric Vehicle Strategy. The CAAP serves as a comprehensive roadmap, summarizing the outcomes of both local and state initiatives for EVs. However, local implementation details are identified in separate strategies such as the EV Strategy.</p>
Transportation	<p>Freeways need to be rerouted and active transportation infrastructure needs to be developed to promote health, reduce GHG emissions and increase walkability.</p>	<p>The City does not have the jurisdiction to re-route freeways, which are the purview of the State of California.</p> <p>The CAP prioritizes active transportation with five supporting actions, including implementing the Bicycle Master Plan and Pedestrian Master Plan.</p>
Transportation	<p>Oppose the Sacramento County Transportation Tax Initiative for</p>	<p>City staff are prohibited from using City resources for political purposes, including supporting or opposing ballot measures.</p>

	consistency with infill/to avoid sprawl.	
Transportation	TR-2 fails to provide free transit to encourage ridership.	While transit fares are managed by SacRT and not the City, the City continues to fund SacRT's RydeFree program to subsidize youth transit ridership.
Equity	Community Engagement methods discussed in the CAAP should be accurately interpreted.	Thank you for your comment. The City employs a variety of methods to provide culturally appropriate and in-language outreach. For implementation of CAAP initiatives such as electrification, staff have engaged with the City's Community Ambassadors program for translation and targeted, issue-specific, in-language events with key stakeholder groups.
Equity	Failure to address key Mayor's Commission on Climate Change (MCCC) recommendations, including foundational Principles (Urgency, Advocacy, Accountability, Education, Financial and Economic Sustainability) and how the CAP will address equity are not included in the plan.	<p>MCCC Foundational Principles of Urgency, Advocacy, Education, and Financial and Economic Sustainability will be included in the full public review draft of the CAAP, to be released for public review in early 2023, including a section about how equity will be a key consideration in how CAAP measures are implemented.</p> <p>In addition, the City's commitment to urgency and accountability are demonstrated with the City's early actions prior to release of the CAP. Following the MCCC recommendations, the City prepared a 2021 Climate Implementation Work Plan (Work Plan) to identify the City's near-term priorities, actions, and funding needs prior to completion of the CAAP. Since release of the Work Plan, staff have been providing quarterly updates on climate progress to City Council. The Work Plan and quarterly reports are available online at cityofsacramento.org/climateaction.</p>
Equity	CAP does not sufficiently address equity. Equity goals are not met.	<p>Equity is introduced in the CAAP and considered as an underpinning for the document. Equity will be further considered in the next draft of the CAAP and addressed in the implementation phase.</p> <p>MCCC recommendations on equity will be added to Chapter 1.</p> <p>Equity and resiliency are also addressed in Chapter 7 (Adaptation), which was not included in the Preliminary Public Review Draft CAP that</p>

		<p>was released on July 1, 2022. Chapter 7 as released in October 2022.</p> <p>In addition, the City is advancing equity in practice, including through supporting the launch of Sacramento’s community-based Sacramento Environmental Justice Collaborative Governance Committee. In addition, the Environmental Justice Element of the forthcoming 2040 General Plan will include goals, policies, and implementing actions that establish a policy framework and implementing actions that address broader equity goals.</p>
Equity	Unsheltered residents and underserved communities are not sufficiently prioritized in the draft.	Equity is introduced in the CAAP and considered as an underpinning for the document. Vulnerable populations, including unsheltered residents and underserved communities, are also considered extensively in the Vulnerability Assessment and Chapter 7 (Adaptation), which was not included in the Preliminary Public Review Draft CAP that was released on July 1, 2022. Chapter 7 was subsequently released in October 2022.
Water Conservation	The CAP should include additional measures to increase incentives to remove turf and replace with drought tolerant landscaping.	The Water Conservation Office’s turf replacement program is mostly funded by rates. Rebates for drought tolerant landscaping and rebate levels associated with the program will be updated in the next 1-2 years and determined whether they should be adjusted. Further associated actions may be considered in Chapter 7 (Adaptation).
Water Conservation	City should incentivize more lawn removal to reduce water use and noise and air pollution, with no size restrictions.	There are no size restrictions to the City’s Water Conservation rebates and incentives to switch to drought-tolerant landscaping and to reduce water use and associated pollution impacts.
Solid Waste	Food recovery goals should be increased.	Food recovery goals are consistent with SB 1383, which is being implemented by local governments in California, including the City of Sacramento.
Solid Waste	Consider banning Styrofoam and single use plastic food ware. Add measures to reduce plastic waste through tracking and replacement with reusable items (MM-4).	Protocols for local climate action planning do not include GHGs from consumer goods like production and consumption of plastics. GHGs from plastic production and consumption is not quantified in the City's GHG inventory; data is limited, and general consumption regulations

		<p>are not directly within the jurisdiction of local governments.</p> <p>As a priority with high GHG benefits, the City is implementing new State requirements pursuant to SB1383, including the recycling of food scraps with other organics.</p>
Landscaping Equipment	<p>Ban gas-powered/fossil fuel-powered landscaping equipment. CAAP should include GHG measure and action re: eliminating gas powered lawn equipment</p> <p>City should convert its own lawn care equipment to all electric.</p>	<p>The forthcoming 2040 General Plan will include a supportive policy and an implementing action that commits the City to exploring further restrictions on the use of gas-powered landscaping equipment as well as a commitment to a just transition for gardeners, especially since these jobs are often held by immigrants and persons of color.</p>
Landscaping Equipment	<p>City should end all gas-powered leaf blower use in Sacramento.</p>	<p>On 11/10/20 City Council adopted an Ordinance: "8.70.020 Use of portable blowers. No person shall operate a portable blower when the air quality index is 101 and above. (Ord. 2020-0042 § 1)."</p> <p>The forthcoming 2040 General Plan will include a supportive policy and an implementing action that commits the City to exploring further restrictions on the use of portable gas-powered landscaping equipment as well as a commitment to a just transition for gardeners, especially since these jobs are often held by immigrants and persons of color.</p>
Solar	<p>Support community solar.</p> <p>Current restrictions block small solar projects.</p>	<p>Action E-4.4 recommends development of a community solar project with storage. Current City regulations seek to streamline accessory solar photovoltaic projects, which typically are eligible for ministerial permits.</p>
Solar	<p>Promote solar and workforce development.</p>	<p>Actions E-4.1, E-4.2, E-4.3, and E-4.4 promote solar and support workforce.</p>
Other	<p>Concern about CEQA streamlining: Aligning the CAAP with CEQA-streamlining measures is detrimental to the health of Sacramento residents.</p>	<p>The CAAP is anticipated to be a qualified GHG reduction plan under CEQA. CEQA streamlining is an important tool to help meet climate goals by facilitating infill housing development and compact, transit supportive land uses.</p>
Other	<p>Collaborate with SACOG and SMUD to implement infill development.</p>	<p>Measure E-5 calls for supporting infill growth with the goal that 90% of new growth occur in the established and center/corridor</p>

		communities and 90% small-lot and attached homes by 2040, consistent with the Regional Sustainable Communities Strategy that is led by SACOG. Measures E-1 through E-4 all entail collaboration with SMUD.
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