



## **NOTICE OF PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING FOR THE SACRAMENTO COUNTY CLIMATE ACTION PLAN**

December 14, 2023

**To:** State Clearinghouse, Responsible and Trustee Agencies, Interested Parties,  
and Organizations

**Lead Agency:** Sacramento County

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**Comment Period:** December 14, 2023 to January 31, 2024

Sacramento County (hereafter the County) is preparing a Climate Action Plan (CAP). The CAP is intended to serve as mitigation for climate change impacts of the County's 2030 General Plan, as provided by Mitigation Measure (MM) CC-2 in the 2030 General Plan EIR (SCH # 2007082086). As the lead agency, the County will prepare a focused Subsequent Environmental Impact Report (SEIR) for the CAP that will tier from the certified 2030 General Plan EIR (SCH # 2007082086) and will evaluate whether implementation of the CAP would result in new or substantially more severe significant impacts than the impacts disclosed in the 2030 General Plan EIR.

The County is issuing this Notice of Preparation (NOP) per Section 15082 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed CAP and the potential environmental effects to enable meaningful input on the scope and content of environmental information to be included in the SEIR. The SEIR will evaluate the potential direct, indirect, and cumulative environmental impacts of implementing the CAP and identify feasible mitigation measures or alternatives that may lessen or avoid any significant impacts. Comments received during this public comment period will be used to focus the environmental analyses in the SEIR.

### **PUBLIC REVIEW PERIOD AND SCOPING MEETING**

This NOP is available for public review and comment beginning December 14, 2023 and ending on January 31, 2024. Copies of this NOP may be reviewed in the Planning and Environmental Review department at the address provided above. Project materials, including this NOP, are also available online at:

<https://planning.saccounty.gov/PlansandProjectsIn-Progress/Pages/CAP.aspx>.

The County will hold a public scoping meeting to inform interested parties about the CAP and provide agencies and the public with an opportunity to submit comments on the scope and content of the environmental information to be included in the SEIR. The public scoping meeting will be conducted virtually on January 10, 2024 from 2:00 to 3:00 pm.

To register for virtual attendance (computer or phone) visit:

Link: <https://saccounty-net.zoomgov.com/j/1606035655?pwd=Y2lwZEZmS0U4T3ppM3M3by9RK3FpZz09>

Meeting ID: 160 603 5655

Passcode: 136188

Any interested person may appear at the public hearing virtually, by either Zoom meeting or telephone. If you have any questions regarding the scoping meeting, contact Todd Smith at (916) 874-6918 or smithtodd@saccounty.gov.

## PROVIDING COMMENTS ON THIS NOTICE OF PREPARATION

Comments and suggestions as to the appropriate scope of analysis in the SEIR are invited from all interested parties. Written and/or email comments or questions concerning the SEIR should be directed to CEQA@saccounty.gov. Comments should be provided at the earliest possible date but must be received by **5:00 p.m. on January 31, 2024**. Please include the commenter's full name and address.

### Focus of Input

Agencies should comment on the scope and content of the environmental information that is germane to the agencies' statutory responsibilities in connection with the proposed project. Comments and suggestions provided during the NOP public review process should focus on the following topics:

**Scope of Environmental Analysis.** Guidance on the scope of analysis for this SEIR, including identification of specific issues that will require closer study due to the location, scale, and character of the activities required to implement the greenhouse gas (GHG) reduction measures in the CAP and achieve established thresholds.

**Mitigation Measures.** Ideas for feasible mitigation measures, including mitigation that could be imposed by the County as CEQA lead agency and that would avoid, minimize, or reduce potentially significant impacts of implementing the GHG reduction measures in the CAP.

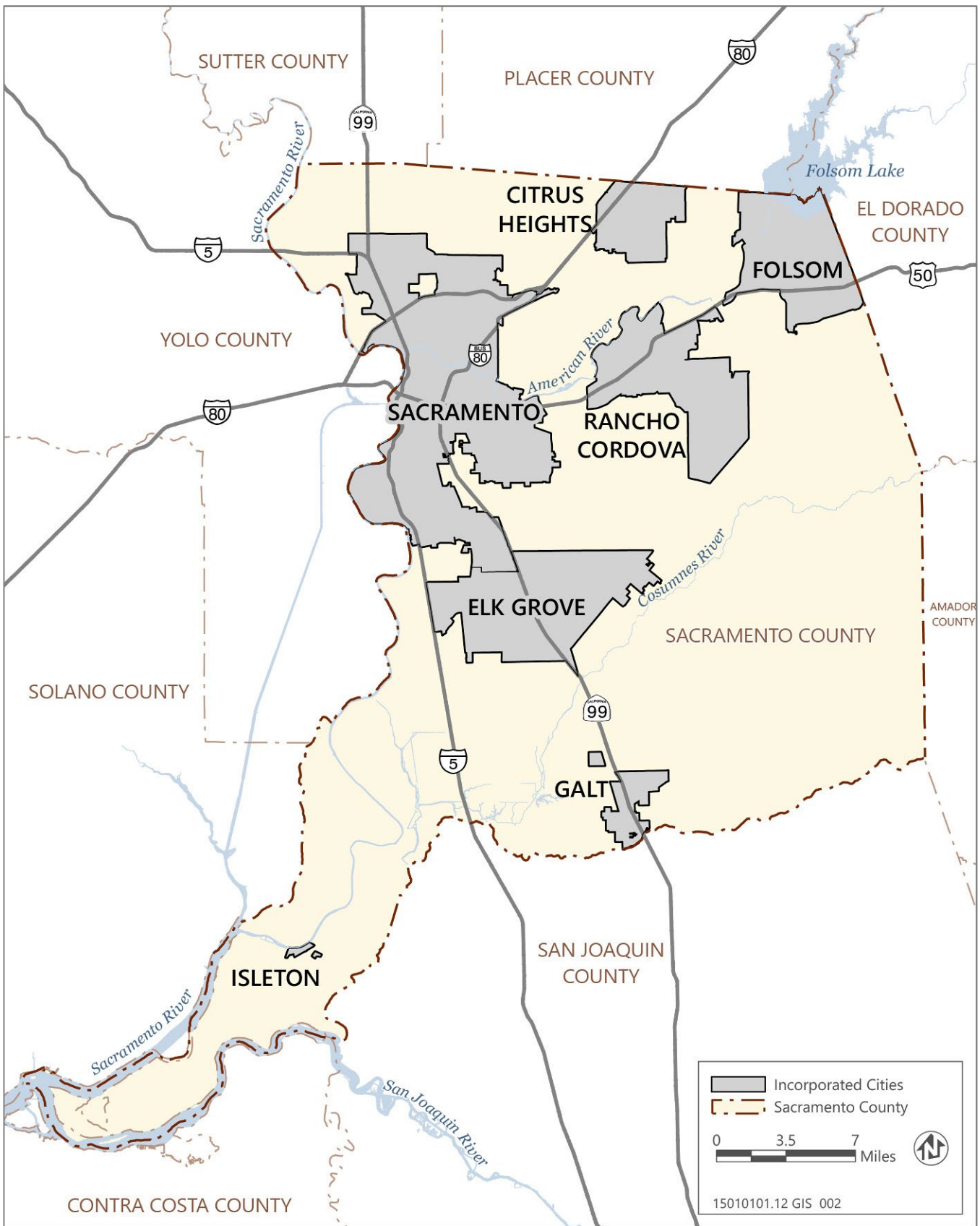
**Alternatives.** Suggestions for alternatives to the proposed CAP, and the GHG reduction measures contained therein, that could avoid or substantially lessen potentially significant impacts.

**Interested Parties.** Identification of public agencies, public and private groups, and individuals that the County should notice regarding the proposed CAP and accompanying SEIR.

## PROJECT OVERVIEW

### Location

The CAP would apply to existing and proposed development in unincorporated Sacramento County, which encompasses approximately 496,083 acres or 775 square miles, and County operations. Sacramento County is in the northern portion of California's Central Valley. As shown in Figure 1, it extends from the delta formed at the confluence of the Sacramento and San Joaquin Rivers in the southwest to Folsom Lake and the Sierra Nevada foothills in the northeast. It is bordered by eight counties: El Dorado, Amador, San Joaquin, Contra Costa, Solano, Yolo, Sutter, and Placer. Interstates 5 and 80, State Route 99, and U.S. Highway 50 provide regional access. The incorporated areas within the county (including the cities of Sacramento, Citrus Heights, Folsom, Rancho Cordova, Galt, Elk Grove, and Isleton) would not be subject to the proposed CAP.



Source: Adapted by Ascent Environmental in 2021.

**Figure 1 Regional Location**

Control Number PLNP2016-00063

## Project Background

Land use and planning decisions within unincorporated Sacramento County are guided by the County's 2030 General Plan. The last update to the General Plan began in 2002 and concluded in November 2011. The County's 2030 General Plan EIR evaluated the environmental effects of growth consistent with the 2030 General Plan and identified a significant impact associated with GHG emissions. Two mitigation measures were adopted to address this impact: MM CC-1 modified the 2030 General Plan to include Policy LU-115 which identified a goal to help achieve the state's then-current goal of reducing GHG emissions to 1990 levels by the year 2020 (per Assembly Bill [AB] 32, the Global Warming Solutions Act of 2006). No further action related to MM CC-1 is required. MM CC-2 requires preparation of a CAP and specifies implementation measures, including when the County must adopt a CAP, what elements the CAP must contain, and how often the County shall complete an inventory of GHG emissions. MM CC-2 was incorporated into the General Plan as Implementation Measures F, G, H, I, and J (General Plan Land Use Element, page 125).

The County implemented MM-CC-2 in several phases. On November 9, 2011, the County Board of Supervisors adopted the *Climate Action Plan – Strategy and Framework Document*, which presented a framework for reducing GHG emissions and an overall strategy to address climate change. On September 11, 2012, the Board of Supervisors adopted the *Climate Action Plan – Government Operations*, which quantified GHG emissions from the County's operations (e.g., County-owned facilities, vehicles, and equipment) and identified measures to reduce these emissions.

The County began work on a comprehensive CAP in 2016, which would supersede the 2011 and 2012 documents. This CAP would update the unincorporated County's GHG inventory and forecasts, identify the required GHG reduction targets, and propose measures to achieve the required GHG reductions for the entire county. Additionally, to prepare for climate change impacts (e.g., impacts related to precipitation, flooding, heat waves, wildfires, air quality, water supply, water quality, natural ecosystems, and agriculture), this CAP would include preparation of a vulnerability assessment and an adaptation strategy.

Several drafts of the comprehensive CAP were circulated for public review in 2021 and 2022. The County continues to refine the CAP in response to stakeholder input. The proposed 2024 CAP would build upon the County's ongoing efforts to address climate change by refining the Final CAP released in August of 2022. The 2024 CAP will identify new GHG emission reduction targets based on the most recently adopted State legislation, modify GHG emission reduction measures (from those previously circulated for public review), and improve alignment of the CAP with recent changes in State regulations including the 2022 Climate Change Scoping Plan. The 2024 CAP will be developed to serve as a qualified GHG reduction plan used for programmatic tiering per CEQA Guidelines Sections 15064.4(b)(3) and 15183.5(b).

## Project Description

The overall objective of the 2024 CAP is to reduce GHG emissions generated from activities within the unincorporated county (community) and GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities, to meet or exceed GHG reduction goals under State laws. The CAP will establish a GHG emissions reduction strategy informed by a baseline inventory and forecast emissions, and establish a strategy for adapting to the impacts of climate change, as described below.

### Baseline and Forecast Greenhouse Gas Emissions

#### Inventory

The County has prepared a Community Inventory and a Government Operations Inventory that provide a snapshot of the major sources of emissions in a single year, while also providing a baseline from which emission trends are projected. The Community Inventory and Government Operations Inventory utilize data from the year 2021, as it was the most recently available complete data year at the time of preparation. The 2021 Community-wide GHG emissions inventory was developed using the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (Community Protocol) version 1.2 (July 2019) developed by Local Governments for Sustainability (ICLEI). The 2021 Government Operations GHG emissions inventory was developed using the ICLEI Local Government Operations Protocol (LGO Protocol), version 1.1 (May 2010) developed by ICLEI.

#### Forecasts

GHG emissions forecasts provide an estimate of future GHG emissions levels based on a continuation of current trends in activity, population and job growth, and relevant regulatory actions by federal, state, and regional agencies (i.e., "legislative" actions) that have been adopted. Emissions forecasts provide insight into the scale of local reductions needed to achieve GHG emission reduction targets.

Using population, employment, and housing data, the results from the 2021 baseline year inventory, emissions will be forecast to 2045 for consistency with the target year for the CAP. Growth projections will be based on the Sacramento Area Council of Governments' 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy, augmented as necessary to reflect in-process and reasonably foreseeable growth not captured in the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy growth projections.

### **Emissions Gap**

The inventory and forecasts are used to develop reduction targets consistent with State mandates. The emissions gap, if any, between forecasted emissions and reduction targets serves as the foundation to determine the strategies and measures needed to reduce GHG emissions to meet the County's target.

### **Greenhouse Gas Reduction Targets**

The 2024 CAP is intended to serve as the County's qualified plan for the reduction of GHG emissions in accordance with Section 15183.5 of the CEQA Guidelines. This requires that the plan establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable. The GHG reduction targets will be based on the most current State legislation (e.g., AB 1279) and planning documents (e.g., the California Air Resources Board's 2022 Scoping Plan).

### **Greenhouse Gas Reduction Strategy**

The 2024 CAP will include a GHG reduction strategy that includes both quantified and non-quantified measures that are based on the 2022 Final CAP, which was circulated for public review but not approved by the County. However, GHG reduction measures may be revised, expanded, or replaced from those previously circulated for public reviews. To meet the requirements of CEQA Guidelines Section 15183.5 and the requirements of MM CC-2, the GHG reduction measures in the 2024 CAP will provide clear and specific implementation components for each of the measures. This will provide evidence that GHG reduction measures can be implemented, monitored, and enforced (where applicable), with clear pathways and metrics for achieving a determined GHG reduction level within the timeline of established targets.

Each GHG reduction measure will clearly identify the appropriate mechanism or vehicle for implementation, including whether the County will need to create a new program or modify an existing program, and whether the development of an ordinance or regulation subsequent to CAP adoption is appropriate to guide and enforce implementation. Not all measures in the CAP will be enforceable through an ordinance; non-regulatory or voluntary programs can be effective in mitigating GHG emissions and can be monitored for effectiveness and quantified reductions. A CAP Consistency Checklist will be required to enforce implementation of applicable GHG reduction measures on projects that wish to utilize the CEQA streamlining benefits of the 2024 CAP for their project-specific GHG impact analysis. Each GHG reduction measure will have a performance standard that will measure the success of a program or that equates to a long-term emissions reduction supported by substantial evidence.

In addition, each measure will include a clear timeline of implementation to support the GHG reductions that can be achieved within the CAP reduction target timeframe. This may include the year by which an ordinance would be adopted or becomes effective, a program established, or an outreach campaign planned and executed. For longer-term measures that include interdependent actions, require further evaluation or study, or currently lack funding sources, the measure will include estimated milestone dates by which certain implementing actions or phases would be completed, particularly when specific implementation details cannot be specified prior to consideration of the 2024 CAP for adoption.

Finally, each measure would include an action to develop a funding mechanism or identify a potential grant funding or financing source. The requirements of MM CC-2 state that an economic analysis must be performed for each GHG reduction measure. A Cost Analysis and Funding Strategy will be completed that will provide an economic analysis detailing a cost-benefit analysis to allow prioritization of near-term reduction measures and actions. The economic analysis will also analyze the County's needs for hiring additional staff to support implementation, as well as costs and funding and financing mechanisms. All costs would be provided as a cost to the County for measure implementation.

### **Climate Change Adaptation Strategy**

This section describes the adaptation framework and presents measures that the County would take to address climate vulnerabilities and increase countywide resiliency, based on the results of the Climate Change Vulnerability Assessment performed for the unincorporated county. The adaptation measures set forth a strategy for the County to prepare for increased: temperatures and extreme heat days, risk of wildfire, drought, flooding, and sea level rise. Many climate adaptation measures may also reduce GHG emissions, improve public health, and achieve other co-benefits that further the County's sustainability and environmental justice goals and improve community resilience.

## INTENDED USES OF THE EIR

The 2030 General Plan EIR includes a preliminary analysis of the potential effects of implementing MM CC-1 and MM CC-2 in Chapter 12, "Climate Change." In concert with state and federal activities, this mitigation is intended to offset the cumulatively significant climate change impact associated with implementation of the 2030 General Plan. The evaluation notes that although "the Climate Action Plan is intended to benefit the County in a variety of ways, there are potential negative physical consequences associated with implementation" (p. 12-33) and provides several specific examples.

As such, consistent with the requirement of CEQA Guidelines Sections 15162 and 15168, the County is preparing a subsequent program EIR (SEIR) that evaluates the scope of actions proposed under the CAP. CEQA Guidelines sections 15162 through 15164 set forth the requirements for additional environmental review when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. Section 15168 sets forth the requirements for preparing a program EIR. The SEIR is appropriate because it is supplementing the analysis prepared in the 2030 General Plan EIR which was also a program EIR.

The County is the CEQA lead agency responsible for adoption and implementation of the proposed 2024 CAP. As the lead agency, the County is responsible for considering the adequacy of the supplemental environmental review before determining if the overall project should be adopted.

## POTENTIAL ENVIRONMENTAL EFFECTS

The SEIR will describe existing conditions and evaluate the potential environmental effects of the 2024 CAP and a reasonable range of alternatives to the proposed plan, including a no-project alternative. The SEIR will address direct, indirect, and cumulative effects and will also discuss potential growth-inducing impacts. In accordance with CEQA Guidelines Section 15162, the evaluation of potential environmental effects in the SEIR will focus on whether the CAP would result in any new or substantially more severe significant impacts compared to those identified in the certified 2030 General Plan EIR. Lastly, the SEIR will identify feasible mitigation measures, if available, to reduce potentially significant impacts of implementing the specific GHG reduction measures identified in the CAP. At this time, the County has determined that the CAP could result in new or substantially more severe significant effects on the resource areas described below. Other environmental resources will be discussed at a lesser level of detail to substantiate the determination that no new or more severe impacts would occur.

### Air Quality

This section of the SEIR will evaluate whether additional emissions would occur due to implementation of the 2024 CAP that were not evaluated in the certified 2030 General Plan EIR and will identify any revisions to mitigation measures or additional mitigation measures that would be necessary to avoid or reduce impacts. A qualitative, programmatic analysis of the potential impacts of implementing the identified GHG reduction measures will be conducted, consistent with requirements of State CEQA Guidelines Section 15168.

### Biological Resources

This section of the SEIR will evaluate whether implementation of the proposed 2024 CAP would result in any new or more severe significant impacts to special-status species and/or habitat beyond those identified in the 2030 General Plan EIR and will identify any necessary mitigation measures to avoid or reduce impacts. A qualitative, programmatic analysis of the potential impacts of implementing the identified GHG reduction measures will be conducted, consistent with requirements of State CEQA Guidelines Section 15168.

### Energy

This section will describe existing energy production and consumption within the county, including existing energy facilities and services in the county provided by the Sacramento Municipal Utility District and Pacific Gas and Electric and a profile of energy consumption in the county, consistent with the energy analysis completed for the CAP. The existing setting will also describe federal, state, and local regulations related to energy consumption, energy efficiency, and/or energy conservation.

The energy analysis will address potential energy use (or savings) associated with GHG reduction measures including electricity, natural gas, and transportation fuel consumption. Because an overarching goal of the CAP will be to reduce energy consumption, improve energy efficiency, and increase renewable energy supply, significant energy impacts are not anticipated. However, if potential impacts are identified, mitigation measures will be recommended to ensure compliance with applicable plans or programs with the intent to conserve energy. The analysis will also evaluate any potential impacts to energy infrastructure facilities.

## Greenhouse Gas Emissions

This section of the SEIR will include a quantitative analysis of greenhouse gas emissions from all sectors (e.g., building energy, mobile, water and wastewater, solid waste) to assess the potential for construction- and operation-related greenhouse gas impacts. Consistent with the requirements of the State CEQA Guidelines Section 15168, the analysis will provide a program-level discussion of the impacts of implementation the CAP. Because an overarching goal of the CAP will be to reduce GHG emissions as described in MM CC-2, New or more severe GHG impacts are not anticipated.

## Transportation

Senate Bill 743, which took effect on July 1, 2020, eliminated the use of automobile delay/level of service under CEQA and identified vehicle miles traveled (VMT) as generally being the most appropriate measure of evaluating transportation impacts (CEQA Guidelines section 15064.3). The SEIR will include analysis of VMT in accordance with Senate Bill 743. Additionally, the SEIR will include an evaluation of impacts on current programs, plans, ordinances, and policies addressing the circulation system (including transit, roadway, bicycle, and pedestrian facilities). This section will describe current VMT, bicycle, pedestrian, transit, and safety policies and standards of the County. The analysis will focus on GHG reduction measures associated with transportation and their relationship with current County VMT thresholds. The SEIR will identify any additional mitigation measures necessary to reduce new or more severe significant transportation impacts.

## Tribal Cultural Resources

Tribal cultural resources were established as a new class of resources under CEQA by AB 52, which became effective on July 1, 2015. Because AB 52 was enacted after certification of the 2030 General Plan EIR, impacts on tribal cultural resources were not evaluated in that document. As such, the SEIR will include an analysis of potential tribal cultural resources impacts.