

May 25, 2011

Christopher Jordan, AICP  
Planning Manager  
City of Elk Grove  
8401 Laguna Palms Way  
Elk Grove, CA 95758

**RE: City of Elk Grove Climate Action Plan and Sustainability Element**

Dear Mr. Jordan:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) would like to commend the City of Elk Grove for moving forward with the development of a comprehensive Sustainability Element (SE) and associated Climate Action Plan (CAP). The choice of the City to develop this greenhouse gas reduction strategy at this time, rather than to wait, will provide your jurisdiction with more time to make progress toward the goals set forth in AB32. In addition, linking the CAP to the General Plan through the inclusion of a SE will help streamline greenhouse gas (GHG) impact analysis as well as reduce costs associated with the environmental process for future proponents.

Recognizing that GHG emissions are a new, evolving and often challenging area for jurisdictions, the SMAQMD comments are intended to provide useful guidance and recommendations from an air quality standpoint. There are a number of commendable components within the overall sustainability strategy that Elk Grove has developed:

- The goals and policies outlined in the SE provide an important update to the General Plan while providing important GHG reducing strategies through the measures in the CAP.
- Preparing a CAP that meets the minimum criteria set forth in §15183.5 of the newly updated 2010 California Environmental Quality Act (CEQA) Guidelines; including a stated emission reduction goal of 15% below 2005 levels by 2020.
- Requiring an annual review of the CAP to identify emission reduction progress and a five year review to ensure all information and measures are current with emerging technology and emission reducing strategies.
- Creating a document from which proponents can tier their environmental documents will reduce time and expense while ensuring consistency with GHG reduction goals of the City and the State should provide an attractive incentive.
- Identifying transportation as the most significant area for emission reductions is an important step in developing the most effective measures.
- Creating a Plan that relies in large part on strong general plan policies, mandatory requirements and innovative measures that are "binding and enforceable" to meet stated goals will ensure greater emission reductions and a stronger overall CAP.

Below are more specific recommendations and suggestions, by policy topic, to help ensure that the CAP is a strong one for the City and that it accomplishes the stated objectives. In addition, we have highlighted measures that are most noteworthy.

### **Built Environment Measures**

BE-2 – Requiring an additional percentage in excess of that required by Title 24 for new construction is a strong measure that lends itself to assessing compliance.

BE-3 – Adopting a RECO/CECO ordinance is a good, aggressive strategy; however, as drafted it assumes a large amount of home turnover to achieve emission reductions and, given the current housing market, those projections may not be justifiable. Given the state of the market, a mandatory rather than voluntary approach may provide greater assurance of emission reductions, though perhaps at a slower pace.

BE-5 – Removing impediments to on-site renewable energy is a smart strategy for encouraging future proponents to supply part or all of their own energy.

BE-6 – A cool pavement strategy is a great measure that could be enhanced by considering adding cool roofs as well.

### **Resource Conservation Measures**

RC-1 – Action items for expanding the construction and demolition ordinance to 65% waste diversion and reducing plastic bag use are both inventive strategies.

RC-2 – In addition to the existing action items proposed, specific requirements for low flow toilets and shower heads can increase reductions from this measure.

### **Transportation Alternatives and Congestion Management**

TACM-3 – For this measure, the General Plan policies referenced in the Action Items are probably not specific enough to result in the emission reductions forecasted. More detail will help with future compliance, monitoring and quantifiable emission reductions.

TACM-4 – Participation in and being supportive of regional Transportation Demand Management (TDM) programs with City programs being offered through eTran is commendable. We recommend evaluating all proposed supporting actions, particularly the requirement for telecommuting and flexible work schedules of new business, for feasibility to ensure the desired results.

TACM-5 – This measure forecasts the largest amount of emission reductions in the entire CAP and includes a solid list of supporting actions.

TACM-6 – We strongly encourage the implementation of the developer impact fee. This type of measure can help ensure the needed funding availability to continue to improve transit service and facilities.

TACM-7 – Jobs/housing balance is a good strategy due to the expected reduction in VMT which leads to a reduction in GHG emissions. However, it is not clear how a project will demonstrate successful implementation of this measure to ensure progress toward forecasted reductions as development occurs.

### **Municipal Programs**

MP-3 – Emission reductions from the incremental replacement of gasoline powered municipal vehicles can be enhanced by setting an annual minimum percentage of vehicles to be replaced. This will provide more certainty in achieving your goals.

As the City moves forward in this effort to meet GHG reduction goals there will be a variety of efforts underway that can bolster established CAP strategies or provide new methods to obtain additional reductions. With that in mind, here are two ideas to consider for the Elk Grove CAP for both now and the future.

1. The SMAQMD plans to develop off-site mitigation programs in the future which may be based on programs similar to the following non-exhaustive list: SmartWay Upgrades (upgrades for diesel trucks), Registered Clean Fleet Program, renewable fuel use, energy upgrades to homes using propane for heat.
2. There is a "checklist" tool currently being used by the City of San Francisco Planning Department to evaluate compliance of development projects with their Climate Action Plan. This tool can be found at the following link <http://www.sf-planning.org/index.aspx?page=1886> and can, of course, be modified for Elk Grove Planning Department use as proponents bring forward projects to tier off the CAP. A tool of this type can save time and help staff with consistent assessment of projects and allow proponents to know what to expect once the CAP is approved.

We appreciate the amount of work that is represented by this draft Climate Action Plan on a dynamic and difficult topic. We offer these comments in hopes of strengthening the document as it moves forward through the approval process. Please contact Charlene McGhee of my staff at [cmcghee@airquality.org](mailto:cmcghee@airquality.org) or (916) 874-4883 us if we can be of any further assistance in this effort.

Regards,



Larry Greene  
Executive Director/Air Pollution Control Officer

c: Larry Robinson, Program Coordinator, Sacramento Metropolitan AQMD  
Charlene McGhee, Associate Air Quality Planner, Sacramento Metropolitan AQMD  
Jeane Berry, Climate Change Coordinator, Sacramento Metropolitan AQMD