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Beyond Carbon Emissions: Benefits of Adopting a Climate Action Plan

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Climate action plans are not just for greenhouse gas (GHG) emissions anymore.

While climate change and long-term sustainability remain primary goals for many cities and counties in adopting climate action plans, there are a number of other, less obvious benefits as well. These benefits can help gain the support of a broad array of stakeholders, bringing together diverse interests.

Climate action plans can help project developers by simplifying and streamlining the CEQA review process for greenhouse gas emissions. This can translate into significant time and money savings. For example, projects in jurisdictions that have adopted qualified climate action plans can avoid doing a separate analysis of their greenhouse gas emissions, as long as the project is consistent with the climate action plan. Consistency with climate action plans can also help projects avoid being required to mitigate their GHG emissions to no-net increase levels, which was recently required by a court case and can be costly. A climate action plan, in contrast, takes a community-wide approach to reducing emissions, so the burden does not fall on any one development. What's more, recent court cases have helped to establish climate action plans as a clear and legally approved option for projects to address climate change, thus reducing the risk of lawsuits.

Climate action plans can also help jurisdictions achieve other regulatory requirements, such as SB 379, which requires jurisdictions to address climate hazards in the safety and housing elements of their general plans. A climate action plan can satisfy this requirement through incorporating a climate vulnerability assessment and risk reduction measures. A holistic vulnerability assessment and adaptation plan can help ensure a more comprehensive evaluation of the increasing risks of floods, wildfires, drought, and other hazards.

Taking a proactive, thorough approach to climate adaptation can be particularly important for communities and local businesses, especially in light of recent disasters. Efforts to boost the resilience of roads, bridges, telecommunications systems, utility infrastructure, levees, and more can help keep residents safe while delivering valuable benefits to small- and medium-size businesses, many of which lack the capacity or savings to recover from unexpected disruptions. Resilience planning can help keep communities safe during storms and other disasters, minimize downtime for schools, business, and critical infrastructure, and ensure that the community can quickly get onto its feet again. As Sacramento County is projected to lose about 4 percent of its economic output with every 1.8F increase in average global temperatures, economic resilience will be crucial to help local businesses, farmers, and residents to weather storms and other disasters.

Beyond preparation, climate action plans can help local businesses save money and access new opportunities. Energy efficiency can help deliver substantial savings – enough to justify the cost of upgrades – as energy demand rises with

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Learning/Networking Opportunities

NPSP 2018

The New Partners for Smart Growth Conference will be held February 1-3, 2018, in San Francisco! Registration is open and the program is available so attendees can choose their sessions. There are 8 thematic tracks including Building Capacity in Small Towns and Rural Communities; Designing Healthy Communities; "One Water" for Resilient Communities; Creating Housing for Everyone; Adapting to a Changing Climate; Planning and Designing Smart-Growth Communities; Improving Transportation Accessibility and Connectivity and Inclusive Prosperity of People and Place. Visit www.newpartners.org to register and plan your adventure!

3rd CALIFORNIA ADAPTATION FORUM

Save the date, August 28-29, 2018, for the 3rd California Adaptation Forum to be held at the Sheraton Grand Hotel in Sacramento. Right now you can take the survey to help select the content of the Forum. Visit <http://www.californiaadaptationforum.org/>.

Parking Protected Bike Lane Pilot

In case you missed it, the City of Sacramento tested a parking protected bike lane along P Street (between 13th and 15th Streets) in early October. A parking protected bike lane is set up with the bike lane next to the sidewalk, then a loading zone, parking zone, and driving lane for autos. This configuration is expected to reduce injuries for bicyclists and promote an increase in bicycling downtown.

The City plans to install protected bikeways beginning Spring 2018. Target streets include P and Q Streets between 9th and 15th Streets and 10th Street between I and Q Streets.

For more information on City Bicycle Programs visit

<https://www.cityofsacramento.org/Public-Works/Transportation/Programs-and-Services/Bicycling-Program>



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more heat waves and hot days. Green, efficient buildings are also demonstrated to help boost worker health, productivity, and cognitive function. The [Living Building Challenge](#), as exemplified locally in Sacramento by [ArchNexus](#), is an innovative sustainability standard that improves both building sustainability and livability. In addition, a climate action plan can help develop the local energy efficiency and renewable energy workforce, attract new businesses, and help jurisdictions become more competitive in winning funding and grants from the State of California's greenhouse gas reduction funds.

In short, a climate action plan should not be looked upon as a burden or a challenge, but as an opportunity that can lead to a stronger economy and more resilient communities. A robust, qualified climate action plan can help streamline more sustainable and resilient development, attract new businesses, while making sure communities are well prepared for future challenges.

To read more about these benefits, SMAQMD recently developed a white paper that covers these points in detail, including discussions of legal rulings and research findings. You can access this white paper at the following link: <http://www.airquality.org/ClimateChange/Documents/CAPWhitePaperLogoFinal.pdf>.

In addition, CivicSpark Fellows also worked with SMAQMD and the City of Galt to develop a matrix of climate action plan strategies that would work well in small and more rural cities. They evaluated climate action plans from cities such as Woodland, Lodi, and Oroville to develop recommendations for measures that will be suited to the characteristics of smaller cities. These recommendations can be found at the following link: <http://www.airquality.org/ClimateChange/Documents/FinalVersionCAPReport.pdf>.

SMAQMD staff would be happy to assist local jurisdictions in preparing and updating climate action plans and climate adaptation plans. Please contact Shelley Jiang at SJiang@airquality.org if you have any questions.

“Cannabisness” Comes to Sacramento

On January 1, 2018, the City of Sacramento will become one of the very few jurisdictions in the state to have in place a regulatory framework for the commercial cultivation of cannabis (now the industry term for marijuana). Within a month after California voters approved recreational cannabis use in November 2016, the City passed its first marijuana cultivation ordinance, part of an ongoing process to develop policy and an infrastructure to regulate the legal cannabis industry. Sacramento's new chief of cannabis, Joe Devlin, has set a goal to replace the estimated more than 1,000 existing illegal grow houses with legalized operations that meet current industry operational standards.

A Flood of Commercial Cultivation Applications

The total building square footage that will be potentially dedicated to cannabis cultivation in Sacramento is substantial. The City began accepting commercial cannabis cultivation applications on April 3, 2017, and by July, had received more than 100 proposals. The City forecasts that it will issue more than 200 Conditional Use Permits (CUPs) for cultivation within the first 12 months. It also anticipates an additional 25 CUPs for marijuana manufacturing, the processing of the plant into oils, foods and other products. The indoor farms proposed vary in size from less than 5,000 square feet to more than 22,000 square feet of crop canopy. The largest application to date is to construct a new medical marijuana cultivation campus of 12 buildings totaling 312,288 square feet.

The SMAQMD is among the municipal agencies that review the cultivation and manufacturing CUP applications. By the end of November, the SMAQMD had provided comments on more than 140 applications. The comments address a variety of direct and indirect impacts the cultivation and processing activities may have on air quality.

Direct and Indirect Air Quality Issues in Indoor Cannabis Cultivation

Odors must be controlled. Cannabis farms, whether indoors or out, have a distinct odor that is, according to some people, skunky. While it is not required for the City's land-use permit, applicants for a business license for cultivation or manufacturing must provide a plan for the technology to prevent odors from escaping, with the standard that outside the building, the odor cannot be detected by a person of normal sensitivity.

Equipment that may emit air pollutants. The large-scale indoor growing of cannabis is electricity-intensive, considered similar to the energy load of a data center. Growers use lighting 24 hours a day and also must climate control the buildings, often cooling down the heat created by the lights. Once the crop is harvested, dehumidifying and drying equipment is used to ready the crop for sale or further processing. The Sacramento Municipal Utility District has researched ways to reduce the anticipated energy load from the new industry, especially since the neighborhoods in which many cultivation sites are located have older substations and electrical lines that may require upgrades. Also, it is expected that some growers may turn to on-site generators for primary or emergency back-up power. The SMAQMD is working with the City's Zoning Administrator to ensure that all approved cultivation and manufacturing applications contain an advisory about SMAQMD requirements.

EDITOR'S NOTE: On November 16, 2017, California's three state cannabis licensing authorities publicly noticed proposed emergency regulations for commercial medicinal and adult-use cannabis, which may impact how the SMAQMD can permit/register engines and equipment related to cannabis cultivation. Please contact the SMAQMD's Permitting Program Manager by calling 916-874-4800 for more information on permitting/registration for a cannabis project.

Utilizing land for marijuana cultivation may conflict with planning goals to improve air quality. Cannabis cultivation and manufacturing are permitted in areas zoned for light or heavy industrial, general or heavy commercial, and agricultural use. The biggest concentration of these zones is in South Sacramento, between Watt Avenue and Power Inn Road, but pockets of these zones exist all over the City. As a result, there are some proposals for cultivation in the more densely populated areas closer to the urban core. A handful are in urban areas, which are, contrary to what the zoning code allows, earmarked in the City's General Plan for Transit-Oriented Development (TOD) to provide concentrated housing, employment, services, and retail within walking distance of Regional Transit light rail stations. But cannabis cultivation sites, by policy, have only a few employees, entry limited to employees and contractors, no visitors allowed, and doors locked at all times. This type of land use is not considered transit supportive. In its comment letters on cannabis projects, the SMAQMD has recommended the City consider placing these uses away from major transit corridors.

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SMAQMD-City Collaboration to Achieve Regional Air Quality Improvements

About 95% of the proposed cultivation sites are in warehouses that were built in the 1970s and 80s, most of which have expansive parking lots devoid of trees. The City's current parking lot shade ordinance requires tree plantings that are designed to result in 50% shading of surface areas within 15 years. But the ordinance applies only to *new* and *resurfaced* parking lots; existing lots are exempt.

The air quality and health benefits of trees are many, at both the local and regional level: trees reduce carbon, ozone, and particulates in the air. They help reduce summertime temperatures and urban heat island effect. Trees in parking lots can cool individual parked cars and reduce the emissions of volatile organic compounds.

In reviewing cultivation proposals, SMAQMD staff evaluate the parking lots for tree shading, and when it appears to be lacking, staff recommend the proponent add trees to the parking lot as a community benefit. The City's Zoning Administrator has supported this effort by attaching the voluntary tree planting request as an advisory condition in the project approval documents. In response, at least six applicants have contacted the SMAQMD to state their intentions to add trees to the parking lot and even to "landscape the entire property in compliance with current Sacramento City ordinances." Another applicant emailed, "I will definitely be adding trees to comply with the new shading requirements. I agree that additional trees are a benefit for all."

As of December 5, 2017, the City's Zoning Administrator had approved 33 cultivation projects. As more proposals move through the City's review process, the SMAQMD will continue to coordinate with the City to minimize the negative air quality impacts and maximize the potential air quality benefits that the new, burgeoning cannabis industry may have on the Sacramento region.

Notables

Guide to Land Use Emission Reductions

An update to SMAQMD's *Recommended Guidance for Land Use Emissions Reductions* was released on November 1, 2017. SMAQMD staff recommends jurisdictions apply the new Guidance (version 4.0) to projects being released for public review on or after January 1, 2018.

Changes to the Guidance include eliminating the use of NO_x in emissions calculations; using annual tons in developing reduction targets and calculating mitigation applicability; updating the conversion rate of ozone precursors to be consistent with the most current State Implementation Plan ensuring appropriate amounts of ROG and NO_x are used to mitigate a project; and eliminating old CalEEMod screenshots, reducing the document size.

Visit <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDLandUseEmissionReductions4.0Final.pdf> for the updated document.

CalEEMod

With the November 19, 2017, release of CalEEMod Version 2016.3.2, SMAQMD staff is now recommending jurisdictions utilize the updated model for analysis for projects being released for public review on or after January 1, 2018.



Construction Mitigation Fees

SMAQMD staff work regularly with project proponents and construction companies building private and public projects in Sacramento to implement construction mitigation measures. Staff conducts this work to assist lead agencies in mitigation compliance. Mitigation measures include using a cleaner emitting equipment fleet, reporting requirements, and sometimes fees to offset the construction emissions to less than significant levels.

Understanding the uniqueness of each project, proponent, and lead agency, SMAQMD staff provides flexible options for implementing the fee component of construction mitigation. Recent discussions with proponents of a large development project led to a request to average daily nitrogen oxide emissions from construction activity over a longer period than the normal monthly timeframe. Further review of the request by SMAQMD staff resulted in an affirmative response, allowing the emission averaging to occur over a calendar quarter, consistent with offset requirements in the permitting section of the SMAQMD.

If your project requires mitigation fees, SMAQMD staff encourages early consultation to determine the best course of action in meeting the mitigation requirement. Contact Karen Huss at khuss@airquality.org for more information.