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January 12, 2012

Stephanie Williams
Senior Planner
Mountain View Community Development Department
500 Castro Street, P.O. Box 7540
Mountain View, CA 94039

Subject: Draft 2030 General Plan and Greenhouse Gas Reduction Program DEIR

Dear Ms. Stephanie Williams:

Bay Area Air Quality Management District (District) staff has reviewed the City of Mountain View's (City) Draft Environmental Impact Report (DEIR) prepared for the Draft 2030 General Plan (Plan) and Greenhouse Gas Reduction Program (GGRP). District staff understands that the Plan is an update to the City's 1992 General Plan, and is intended to guide development, preservation and environmental conservation throughout the entire City. The Plan seeks to focus future development near transit services, promote green building and sustainable practices, and protect, expand and maintain natural resources and recreational opportunities. The Plan anticipates the accommodation of 14,710 new residents, 8,970 new housing units, and 21,760 new jobs in the City by 2030. The GGRP was prepared concurrently with the Plan, with the main goal of creating an implementation tool for the Plan that will achieve State greenhouse gas (GHG) emission reductions while streamlining the development process. The City was awarded a \$45,130 grant from the District's Climate Protection Grant Program to aid in the development of the GGRP.

District staff has the following specific comments on the DEIR and GGRP.

Operational-related Criteria Air Pollutant Emissions

The DEIR finds, on pg. 227, that implementation of the Plan would result in a cumulatively considerable net increase in ozone precursors and particulate emissions (because the Plan anticipates VMT growth to be higher than population growth), even after the implementation of mitigation measures **AIR-1**, **AIR-2**, and **AIR-3**. The Plan also includes numerous policies and actions that are designed to reduce emissions from motor vehicles by reducing VMT as well vehicle idling and traffic congestion (starting on pg. 209 of the DEIR).

However, the majority of the policies/actions are expressed in broad terms, such as "encourage bicycle amenities and access on public transit". We suggest that the Plan could be more effective at reducing VMT if the voluntary policies and/or actions were made mandatory. We encourage the City to consider making the following changes, as this would increase the likelihood that VMT would increase at a lower rate:

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- Change the terms “encourage” and “promote” to “require” in all transportation and land use related policies and actions in the Plan;
- Change “consider modifying” to “modify” minimum parking requirements for development projects that implement TDM programs, locate near major transit nodes and/or feature specialized uses with lower parking demand.

According to the DEIR, VMT is projected to grow by 12% and population to grow by 10%. In the analysis in the DEIR, policies which are not mandatory in the Plan were not quantified for potential future VMT reductions. We suggest that making the changes identified above would likely demonstrate a further decrease in projected VMT to at or below 10%, which would help lower operational-related criteria air pollutant emissions to a level of insignificance.

Risks and Hazards to New Sensitive Receptors

The DEIR identified potentially significant impacts to new sensitive receptors from a number of sources of toxic air contaminant (TAC) and PM emissions, including freeways, major roadways, stationary sources, and the CalTrain railroad line/stations. The DEIR included mitigation measure **AIR-5**, which is to “adopt procedures to require health risk assessments, emissions analysis and risk reduction plans in accordance with BAAQMD-recommended procedures for sensitive land uses and establish standard mitigation measures and development conditions to comply with BAAQMD standards”. According to the DEIR, implementation of **AIR-5** will lessen potential impacts to a level of insignificance.

The District is pleased to see a commitment to addressing exposure of sensitive receptors to TAC’s and/or PM concentrations in the Plan. District staff suggests identifying a timeframe for adoption of the procedures and plans (**AIR-5**) by the City. District staff is happy to assist City staff in drafting the procedures, mitigation measures and development conditions.

Greenhouse Gas Reduction Strategy

District staff reviewed the City’s Draft Greenhouse Gas Reduction Program (GGRP). The City’s climate protection goal is to improve community-wide, per service population (jobs + residents) emissions efficiency by 15% to 20% over 2005 levels by 2020, and 30% by 2030. This amounts to an efficiency level of 5.1 to 5.4 metric tons (MT) GHG emissions per service population in 2020, and 4.5 in 2030.

The District supports the City’s efforts in developing the GGRP. The District’s intent in creating the Qualified GHG Reduction Strategy as an operational threshold of significance in its CEQA Guidelines is to ensure that communities will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32 and Executive Order S-3-05.

Implementation Strategy

The implementation and monitoring strategy described in Chapter 5 calls for conducting measure evaluation and updating the community-wide GHG inventory every five years. This is critical to gauging overall progress toward the GHG emission reduction target. The implementation strategy should also require annual review and reporting on the progress and implementation of individual measures, including how new projects have been incorporating relevant measures and assessment of how state level policies included in the GGRP have been performing. Identifying gaps in implementation on an annual basis can help keep the GGRP on track and decision-makers informed of potential emission reduction shortfalls that may need to be addressed. The GGRP should identify

which reduction measures will be implemented in the near-term vs. longer-term in order to ensure that measures are being implemented and GHG emission reductions are occurring as planned.

The City has included text in the GGRP stating that, "*the City will assess the implications of new scientific findings and technology, explore new opportunities for GHG reduction, respond to changes in climate policy, and incorporate these changes in future updates to the GGRP to ensure an effective and efficient program.*" The District acknowledges this important emphasis on monitoring the implementation of the GHG mitigation measures in the GGRP. Ongoing monitoring is critical in order to demonstrate that the GGRP is achieving its goals, thereby maintaining its status as a Qualified GHG Reduction Strategy over time.

With the changes noted above, the District agrees the GGRP meets the minimum standard elements of a Qualified GHG Reduction Strategy as defined by the District's CEQA Guidelines. However, there is a degree of uncertainty due to the GGRP's heavy reliance on statewide measures to achieve the GHG reduction target, and we therefore recommend strengthening the GHG reduction measures as described below.

2030 GHG Reduction Target

The GGRP includes GHG reduction targets for 2020 and 2030. According to the GGRP, the City will achieve a GHG efficiency level of 5.1 to 5.4 metric tons (MT) per service population in 2020. This is below the District's efficiency threshold of 6.6 MT GHGs per service population. For future years, the District's 6.6 efficiency threshold should be extrapolated out to the target year. For 2030, the efficiency threshold would be 4.3 MT GHGs per service population. The GGRP's 2030 goal is to reach a 4.5 efficiency level, which exceeds the District's extrapolated threshold. In order for projects coming online after 2020 to tier off the GGRP's environmental analysis, the GGRP at that time should demonstrate a 2030 reduction target of no more than 4.3 MT GHGs per service population.

Strengthening the GHG Reduction Strategy

In aggregate, the GHG reduction measures add up to the GGRP's emission reduction target for 2020. However, extensive reliance on state level action to achieve the reduction target leaves the City open to failing to achieve its target should any of the state measures fall short of full implementation. For example, PG&E is currently performing below its expected level under the California Renewables Portfolio Standard (RPS). Utilities were required to meet an interim target of 20% renewable energy by 2010. According to the RPS Third Quarterly Report for 2011, PG&E fell below this goal with only 15.9% of its retail sales for 2010 certified as eligible renewable. In addition, the U.S. District Court recently enjoined the California Air Resources Board from enforcing the Low Carbon Fuel Standard (LCFS). The GGRP assumes that both the RPS and LCFS will be fully implemented, and depends upon GHG emission reductions from these policies to achieve its emission reduction goals. To protect against these and other potential shortfalls, District staff recommends that the City strengthen the locally-implemented GHG reduction measures in the GGRP.

The District recommends that the City expand some of the measures currently in the GGRP, specifically:

- The PACE program called for in measure E-1.2 should be expanded to include residential property owners, as well as a target date for implementation;

- The energy efficiency requirements for measures E-1.3, E-1.6 and E-1.7 should be increased to exceed Title 24 by a minimum of 15%;
- The TDM requirements of Measure T-1.1 should be mandatory for existing employers of 50+ employees rather than voluntary;
- Measure E-1.8 should be expanded to require tree shading in new parking lots;
- Measure E-2.1 should be changed from a voluntary measure to requiring solar water heating for pools and spas;
- More detail added to measure SW-1.1 on the specific policy elements of the zero waste plan.

The District also recommends that additional mandatory measures be included in the GGRP in order to strengthen the GGRP's ability to meet its GHG reduction goals. The District recommends adding mandatory measures that are found in many other climate action plans, such as:

- A time-of-sale (RECO/CECO) energy efficiency requirement that exceeds Title 24 for existing development;
- Cool roofing and cool paving requirements for new development and remodels;
- Preferential parking for low emission vehicles;
- Transportation policies that reduce home to school vehicle trips, such as implementing a Safe Routes to School program.

The District appreciates the responsiveness that City staff and their consultants have demonstrated in providing District staff with additional information and clarifications. District staff looks forward to working with the City of Mountain View as you move forward on implementation of the Plan and the GGRP. If you have any questions regarding the GGRP please contact Abby Young, Principal Environmental Planner, (415) 749-4754. If you have any questions regarding the other comments in this letter, please contact Jackie Winkel, Environmental Planner, (415) 749-4933.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jean Roggenkamp', with the initials 'for' written below it.

Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Susan Garner
BAAQMD Director Ash Kalra
BAAQMD Director Liz Kniss
BAAQMD Director Ken Yeager