



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

April 24, 2013

Mr. Michael Laughlin
Town Planner
Planning Department
1190 El Camino Real
Colma, CA 94014

Subject: Town of Colma Draft Climate Action Plan

Dear Mr. Laughlin,

Bay Area Air Quality Management District (District) staff has reviewed the Town's Draft Climate Action Plan (Plan). We understand that the Town's intentions in developing the Plan are to reduce greenhouse gas (GHG) emissions throughout the Town and to streamline CEQA review of new land use projects.

The District applauds the Town's initiative in addressing GHG emissions and supports its efforts in developing the Plan. The District has the following specific comments on the Plan.

In order to meet California's GHG reduction goals for AB 32 and, more importantly, for Executive Order S-3-05 (an 80% reduction below 1990 levels by 2050), California will need to explore all feasible avenues to achieve significant emission reductions, from transportation as well as the existing built community. In this spirit, we have identified additional feasible measures that have proven effective at reducing GHG emissions in other jurisdictions that have not been included in the Plan. The District recommends that the Plan strengthen its GHG reduction approach in the following ways:

1) Advance the development of a Commercial Energy Conservation Ordinance (CECO) from the next 4-8 years to immediately. As written, the Town could delay adopting the CECO until after the Town's 2020 target year, contributing nothing toward the Town's GHG reduction goal. Given the commercial sector's substantial contribution to the Town's overall GHG profile, a CECO is an excellent policy to include in the Plan. However the CECO's implementation should begin as soon as possible in order to maximize GHG reductions from this sector. The District also recommends that the Plan include a residential energy conservation ordinance (RECO), in order to achieve further GHG reductions from the built community.

2) Extend the municipal outdoor lighting program to the commercial sector. Due to the size and nature of the larger commercial entities in Colma, outdoor lighting provides a significant opportunity to reduce GHG emissions, energy use and costs.

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- 3) Expand the Transportation Demand Management (TDM) program. The Plan includes a mandatory comprehensive TDM program for large new employers, and the District supports this measure. We understand that the Town plans to continue to develop voluntary TDM strategies, in addition to those already included in the Plan, targeting large retail employers. In addition to these approaches, District staff recommends that the Town consider extending *mandatory* TDM requirements to existing large employers. For example, such programs could include allowing employees to exclude from taxable wages the commuting costs of transit, vanpools or cycling; employer-paid subsidies for commuting by transit or vanpool; employer-provided bus, shuttle or vanpool service; or other programs such as telecommuting, rideshare matching, etc. These strategies would complement the District's upcoming region-wide commuter benefits program authorized by Senate Bill 1339.

We commend the Town for its efforts to address the critical issue of climate change through local action. By addressing the recommendations in this letter, District staff believes that the Plan would be more likely to achieve its GHG reduction target and the Town would be in a better position to use the Plan as a tierable document under CEQA.

District staff is available to assist the Town in addressing these comments. If you have any questions, please contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Secretary Carole Groom
BAAQMD Director Carol Klatt