



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

February 15, 2011

Mike Yankovich
Planning Manager
Solano County Dept. of Resource Management
675 Texas Street, Suite 5500
Fairfield, CA 94533-6341

Subject: Draft GHG Reduction Strategy

ALAMEDA COUNTY
Tom Bates
(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

CONTRA COSTA COUNTY
John Gioia
(Vice-Chair)
David Hudson
Mark Ross
Gayle B. Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Eric Mar
Ed Lee

SAN MATEO COUNTY
Carol Klatt
Carole Groom

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Secretary)
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Dear Mr. Yankovich:

Bay Area Air Quality Management District (District) staff reviewed the County of Solano's (County's) Draft Climate Action Plan (Plan). We understand that the County's 2008 General Plan commits the County to develop a climate action plan. The County's climate protection goal is to reduce community-wide greenhouse gas (GHG) emissions from the unincorporated portions of the County 20% below 2005 levels by 2020.

The District applauds the County's comprehensive approach to reducing GHG emissions and supports its efforts in developing the Plan. The District's intent in creating the Qualified GHG Reduction Strategy as an operational threshold of significance in our CEQA Guidelines is to encourage that communities will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32. In its Draft Plan, the County has demonstrated that it is supporting the State in this endeavor.

In some areas, the County has surpassed the minimum standard elements of a Qualified GHG Reduction Strategy as laid out in the District's CEQA Guidelines. For example, the County's GHG reduction goal is more stringent than the State's AB 32 goal, and the County is committed to updating the GHG inventory every three years, exceeding the District's recommendation that this be done a minimum of every five years.

In a few instances, it appears that the County may have overestimated the reductions anticipated from GHG reduction measures. In the case of the Community Choice Aggregation (CCA) measure (measure E-1), for example, a large amount of GHG emissions are estimated to be reduced from this highly speculative measure. While CCA can be very effective at reducing GHG emissions (such as in Marin County), the description of the measure in the Plan focuses on the development of the structure of the CCA and falls short of addressing actual implementation. In the Rideshare Infrastructure measure (measure TC-1), a 5% increase in ridesharing is expected, which may be overly optimistic for Solano County. These potential overestimations are tempered,

Spare the Air

The Air District is a Certified Green Business

Printed using soy-based inks on 100% post-consumer recycled content paper



however, by inclusion of more GHG reduction measures than necessary to meet the reduction target, and by the Plan's inclusion of "Alternative GHG Reduction Scenarios." In these scenarios, the County demonstrates that, even with constricted implementation of the Plan (such as a failure to implement the CCA measure), the County is still likely to exceed its 20% GHG reduction target due to the extra GHG reduction measures included in the Plan, *provided all of the proposed measures are implemented.*

The Plan contains a majority of voluntary "supportive" measures that are not counted toward the GHG reduction target. The District recommends that the Plan include additional mandatory measures that are found in many other climate action plans, and consider making some of the voluntary measures mandatory. In particular, Solano County's Plan would benefit from more measures to address transportation emissions. The District recommends that the County consider including the following kinds of measures in the Plan prior to adoption:

- density and mixed-use requirements for new development in commercial areas;
- parking strategies such as pricing, eliminating minimum requirements for new development, and unbundling parking costs from rents;
- a transportation demand ordinance that requires employers to provide transit subsidies, guaranteed rides home, etc., phased in to begin with new employers and later include existing employers;
- expansion of the Rideshare program to include preferential parking for rideshare vehicles, mandatory inclusion of ridesharing in employer TDM programs, etc., thus increasing the likelihood of achieving the target 5% increase in ridesharing;
- a time-of-sale (RECO/CECO) energy efficiency requirement that exceeds Title 24 for existing development.

The implementation section of the Plan is strong. However, with the large number of voluntary measures, it may be difficult to ensure that new projects are adequately integrating all the relevant measures. The District suggests developing a checklist or similar tool that enables project developers to see all the mandatory and voluntary measures included in the Plan that apply to their project, and which enables the County to ensure that all projects are incorporating all relevant measures as part of the project approval process. A sample compliance checklist used by the City and County of San Francisco for this purpose is enclosed for your information.

With the suggested changes identified in this letter, the District believes that this Plan would meet the minimum standard elements of a Qualified GHG Reduction Strategy. Aggressive GHG reduction targets and comprehensive strategies like Solano County's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn. District staff looks forward to working with Solano County as you move forward with your climate protection efforts.

If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Roggenkamp". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Jim Spering