



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

ALAMEDA COUNTY

Tom Bates
Scott Haggerty
Nate Miley
(Vice-Chair)
Tim Sbranti

CONTRA COSTA COUNTY

John Gioia
David Hudson
Mary Piepho
Mark Ross

MARIN COUNTY

Susan Adams

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

John Avalos
Edwin M. Lee
Eric Mar

SAN MATEO COUNTY

Carole Groom
(Secretary)
Carol Klatt

SANTA CLARA COUNTY

Cindy Chavez
Ash Kalra
(Chair)
Liz Kniss
Jan Pepper

SOLANO COUNTY

James Spering

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

November 21, 2013

Zachary Dahl, Senior Planner
City of Los Altos
Community Development Department
1 North San Antonio Road
Los Altos, CA 94022

Subject: Draft Climate Action Plan

Dear Mr. Dahl,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Los Altos' (City) Draft Climate Action Plan (Plan). The Plan outlines the City's long-term strategy for reducing communitywide greenhouse gas (GHG) emissions, with a goal of reducing emissions 15% below 2005 levels by 2020. Staff understands that the Plan includes a range of educational, voluntary and mandatory elements within five focus areas to achieve GHG emission reductions. The Air District commends the City for addressing GHG emissions and supports the City's efforts in developing the Plan. The Air District has the following comments specific to Los Altos' Climate Action Plan.

GHG Reduction Measures

Staff supports the City for including local actions, that when coupled with state actions, will help Los Altos achieve its GHG reduction target. However, Air District staff recommends the City make its local actions mandatory to ensure the estimated reductions in GHG emissions are achieved; to protect against potential shortfalls from state actions; and to better place the City on a trajectory to achieve the State's, and Air District's, climate stabilization goal of an 80% reduction below 1990 levels by 2050 (Executive Order S-3-05).

Staff recommends the City strengthen its GHG reduction approach as follows:

- Amend 1.1-B, Pedestrian Master Plan, to include implementation actions for reducing local vehicle trips. Implementation actions may include requiring new development to provide pedestrian access that internally links all surrounding uses.
- Amend 1.2-A, Local Transit Service, to specify what goals will be established, and list the commitments the City will pursue to increase transit ridership.
- Amend 1.3-A, EV Charging Stations, to specify how the City intends to implement the measure. This could include identifying funding sources, specifying station locations, and providing the number of stations to be installed per year. We refer City staff to the Air District's Plug-in Electric Vehicle (PEV) Ready program, which provides information, resources and funding opportunities to support local EV efforts.

http://www.bayareapevready.org/?doing_wp_cron=1384975390.7400469779968261718750

- Add an additional measure to develop and implement indoor water conservation requirements in new development and in upgrades of existing residential and commercial buildings.

Monitoring and Implementation

The Plan contains a strong monitoring program that includes annual tracking and reporting on the implementation of Plan measures, conducting a new emissions inventory in two years, and developing a Compliance Checklist for new development projects. Air District staff supports this implementation approach, recognizing that ongoing monitoring and updating of the Plan is necessary to determine whether the Plan is on track to achieving its GHG emission reduction targets.

The Air District commends the City for addressing the critical issue of climate change through local action. By addressing the issues in this letter, Air District staff believes that the Plan would be more likely to achieve its GHG reduction target and that the City would be in a better position to use the Plan as a tierable document under CEQA.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754 or at ayoung@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

Attachment

cc: BAAQMD Director Cindy Chavez
BAAQMD Chair Ash Kalra
BAAQMD Director Liz Kniss
BAAQMD Director Jan Pepper