



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

January 6, 2012

Janice Stern
Planning Manager
Community Development Department
P.O. Box 520
Pleasanton, CA 94566

Subject: Draft Climate Action Plan

Dear Ms. Janice Stern:

Bay Area Air Quality Management District (District) staff submitted a comment letter (dated November 16, 2011) on The City of Pleasanton's (City's) Housing Element Update, Climate Action Plan, General Plan Amendment and Rezoning, Draft Supplemental Environmental Impact Report. In the letter, the District recommended several changes to the Draft Climate Action Plan (Plan) in order for the Plan to be considered a "Qualified Greenhouse Gas Reduction Strategy" in accordance with the District's CEQA Guidelines. Subsequently, City staff has modified the Plan following the District's recommendations.

In its earlier letter, the District advised that the City was incorrectly including greenhouse gas (GHG) emission reductions from future increases in fuel prices and that the Plan should be adjusted accordingly. The City responded by removing projected GHG reductions due to potential fuel price changes from the Plan, leaving the Plan approximately 11,000 tons short of achieving its GHG reduction target. Upon advice of the District, the City strengthened mitigation measure TDM2-9, which requires new commercial developments over a certain size to provide transportation demand management programs to employees. This modification serves to include more employers in the requirement, thus achieving greater GHG reductions. In addition, recent data on home solar installations has revealed that mitigation measure ER2-2 (Solar City Program) has achieved far greater actual GHG reductions than anticipated. The greater levels of emissions reduced by these two measures has more than compensated for the shortfall caused by removing GHG reductions due to fuel price changes.

The District supports the changes to the Plan made by the City. With these modifications, the District believes that this Plan meets the minimum standard elements of a Qualified GHG Reduction Strategy as defined by the District's CEQA Guidelines.

The District appreciates the early and regular communication that City staff and their consultants have provided to the District during the development of the Plan. The District also appreciates the responsiveness with which City staff have addressed the recommendations made in the District's November comment letter.

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The City has clearly made a significant commitment to climate protection, through the draft Climate Action Plan and the many climate-friendly policies and programs it has implemented to date. The District looks forward to working with the City of Pleasanton as it moves forward with implementing the Climate Action Plan and other climate protection strategies.

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

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Chairperson Tom Bates
BAAQMD Director Scott Haggerty
BAAQMD Director Jennifer Hosterman
BAAQMD Director Nate Miley