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DISTRICT  
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March 12, 2012

Gillian Hayes  
Project Manager  
City of Santa Rosa  
Community Development Department  
100 Santa Rosa Avenue Room 3  
Santa Rosa, CA 95404

Subject: Supplemental Environmental Impact Report for the Santa Rosa  
Greenhouse Gas Reduction Program

Dear Ms. Hayes:

Bay Area Air Quality Management District (District) staff has reviewed the City of Santa Rosa's (City) Draft Climate Action Plan (Plan) and General Plan amendments designed to integrate the Plan into the General Plan.

The District applauds the City's comprehensive approach to reducing GHG emissions and supports its efforts in developing the Plan. In particular, the District is encouraged by the Plan's inclusion of mandatory measures to reduce greenhouse gas (GHG) emissions, such as CECO/RECO-type policies, cool roofing and paving requirements, parking strategies and mandatory employer transportation demand management programs. These types of measures are needed throughout the Bay Area and California if the State is to meet its GHG reduction goals under AB 32 and beyond.

GHG Emission Reduction Measures

We understand that in 2005, the City adopted a GHG reduction goal of reducing GHG emissions 25% below 1990 levels by 2015, which is the equivalent of a 37% reduction below the Plan's baseline of 2007. This goal exceeds the AB 32 target of reducing GHG emissions 15% below "current" (2008) levels by 2020 and therefore exceeds the standard for a Qualified GHG Reduction Strategy as defined by the District's CEQA Guidelines.

The Plan includes a comprehensive list of mandatory and voluntary GHG reduction measures that address both existing and new development. However, the GHG reduction estimates for certain measures appear to be overestimated, such as anticipating that over 20,000 tons of GHGs will be reduced within the next three years from energy efficiency upgrades to existing buildings. While this overestimation may keep the City from achieving its more aggressive 2015 goal, District staff believes that the City should be able to meet the 2020 AB 32 target.

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We have identified some feasible measures that have proven effective at reducing GHG emissions that have not been included in the Plan would help the City meet the more aggressive 2015 target. We strongly encourage the City to consider strengthening the mandatory measures in the Plan, as this would help guard against any emission reduction shortfalls that may occur as individual measures perform below expectations or are delayed in their implementation. The District recommends that the Plan strengthen its GHG reduction approach in the following ways:

- Expand Measure 4.3: Car Sharing and Transportation Demand Management to require *existing* employers of 50 or more employees to offer TDM programs to their employees;
- Expand Measure 1.2: Energy Efficiency in Existing Buildings to require CALGreen Tier 1 standards for energy efficiency to be met by remodels of *existing* buildings, both commercial and residential;
- Expand Measure 7.1: Water Conservation to require CALGreen Tier 1 standards for water conservation to be met by remodels of *existing* buildings, both commercial and residential;
- Add a new measure of adopting a commuter benefit ordinance requiring employers to offer employees the ability to use pre-tax wages for transit passes or vanpooling.

### Implementation Strategy

The Plan's Implementation Section states, "*In the event that GHG reductions do not occur as expected, the City will be able to modify and add further policies to the CAP to ensure the City meets the local reduction target.*" The District acknowledges this important emphasis on monitoring the implementation of the GHG reduction measures in the Plan. Ongoing monitoring is critical in order to demonstrate that the Plan is achieving its goals, thereby maintaining its status as a Qualified GHG Reduction Strategy over time.

District staff believes that the Plan meets the standard elements laid out in the District's CEQA Guidelines for a Qualified GHG Reduction Strategy. However, implementation and monitoring of the Plan will be critical to the ability of subsequent projects to tier their GHG analysis required under CEQA.

City staff has been very helpful and responsive in discussing these issues with District staff. If you have any questions, please contact Abby Young, Principal Environmental Planner, (415) 749-4754.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Susan Gorin  
BAAQMD Director Shirlee Zane