



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

September 21, 2011

Michelle Hightower
Acting Planning Manager
City of Vallejo
555 Santa Clara Street
P.O. Box 3068
Vallejo, CA 94590

Subject: Draft Climate Action Plan

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Dear Ms. Hightower:

Bay Area Air Quality Management District (District) staff reviewed the City of Vallejo's (City's) Draft Climate Action Plan (Plan). We understand that the Plan is a stand-alone strategic policy document that will be implemented by the City, businesses, and residents. The City's climate protection goal is to reduce community-wide greenhouse gas (GHG) emissions 15% below 2008 levels by 2020.

The District became aware of the Plan through a review of the State's CEQAnet website. The District requests that the City send all future environmental review documents to the Air District.

The District applauds the City's initiative in addressing 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.

The District has the following specific comments on the Plan.

If the intent of the Plan is to serve as a *Qualified GHG Reduction Strategy*, as defined by the District's CEQA Guidelines, then the Plan must be consistent with the methodology and thresholds of significance outlined in the District's CEQA Guidelines for *Qualified GHG Reduction Strategies* (Section 4.3) for future tiering purposes. The District does not believe that the Plan has yet met this standard for the following reasons:

- Estimates of emission reductions from GHG mitigation measures are not supported with substantial evidence;
- There is a lack of substantial mandatory emission reduction measures.

The Plan does not include the specific assumptions and calculations used to develop the emission reduction estimates for the GHG mitigation measures. Without this detail available, the District cannot perform the level of analysis required to determine if the Plan meets the minimum standard elements of a

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Qualified GHG Reduction Strategy as described in the District's CEQA Guidelines.

In a few instances, it appears that the City may have overestimated the reductions anticipated from GHG reduction measures. For example, measure RE-2: Renewable Energy Financing assumes a very high level of emission reductions from a potential regional PACE-style renewable energy financing program. Based on the implementation actions identified in the Plan, the emission reduction estimate for this measure appears to indicate a highly optimistic assumption of participation. Measure OT-1: Efficient and Alternative Fuel Vehicles is the single largest GHG emission reduction measure in the Plan. This measure relies largely on the voluntary use of HOV lanes by Vallejo-based drivers, assuming a proportionately large amount of vehicles will utilize HOV lanes. Due to the speculative nature of this measure, the City should lower its expectation for emission reductions unless the City can provide substantial evidence to support the high level of estimated reductions.

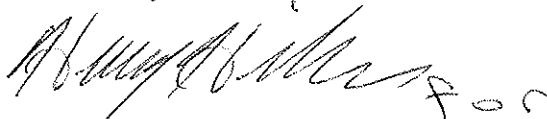
Additionally, we have identified feasible measures that have proven effective at reducing GHG emissions that have not been included in the Plan. We strongly encourage the City to consider adding additional mandatory measures, as this would increase the likelihood that the City's GHG reduction target would be met. The District recommends that the Plan include additional mandatory measures such as:

- parking strategies such as pricing and unbundling parking costs from rents;
- 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;
- water conservation requirements on new construction and remodels.

The District emphasizes the importance of 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.

District staff recognizes that the Draft Climate Action Plan includes valuable analysis and policies, and represents a significant commitment by the City. District staff is available to assist City staff in addressing these comments. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Jim Spering