



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

August 5, 2010

Martha Aja  
City Manager's Office  
100 Civic Plaza  
Dublin, CA 94568

Subject: Draft Dublin Climate Action Plan

Dear Martha Aja:

Bay Area Air Quality Management District (District) staff reviewed the City's Draft Climate Action Plan (CAP) and the Draft Negative Declaration. We understand that the project is the adoption of the CAP, a document that provides policies and measures aimed at reducing greenhouse gas (GHG) emissions within the City. The goal of the CAP is to reduce the City's communitywide GHG emissions by 25% below a business-as-usual scenario by 2020. The CAP describes the baseline GHG emissions produced in Dublin in 2005 and estimates GHG emissions in 2020 that could be expected if the CAP is not implemented. The City expects emission reductions to be achieved by a range of measures under the City's control, coupled with state initiatives aimed at reducing GHG emissions.

The District applauds the City's proactive approach to reducing GHG emissions and supports its efforts in developing the CAP. Further, the District believes a Qualified GHG Reduction Strategy, as in this case the City's CAP, is an effective and efficient strategy to address GHG emissions. We offer our assistance towards ensuring the CAP meets the City of Dublin's goals and the District's standard elements of a Qualified GHG Reduction Strategy set forth in our recently updated CEQA Guidelines (June, 2010).

The District has the following specific comments on the CAP.

**Baseline GHG Emissions Inventory**

The methodology used by the City is not consistent with the District's recommended methodology for quantifying a plan's GHG emission inventory and therefore should not be compared to the District's significance threshold to determine the significance of the CAP's GHG impacts as is stated in the City's Negative Declaration. (BAAQMD CEQA Air Quality Guidelines, at page 9-3; Draft Negative Declaration at page 6.) To clarify, the CAP should be designed by following the District's recommended methodology and thus meet the District's criteria of a Qualified GHG Reduction Strategy.

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The District recommends the CAP's emissions inventory account, at a minimum, for municipal and communitywide emissions from the following sectors:

1. Transportation
2. Commercial
3. Industrial
4. Residential
5. Solid Waste

The CAP's emissions inventory, however, excludes certain emission sources and may lack sufficient information. First, District staff was unable to determine how the CAP addresses the relationship between energy and water. The inventory may lack emissions, for example, from wastewater treatment processes. The CAP states at page 17, "*water related emissions were not included in the inventory*". While water related emissions are typically embodied in the energy data for residential, commercial, and industrial sectors, emissions associated with wastewater may not be. The District recommends the CAP follow the guidance on quantifying emissions from wastewater treatment processes, located in the District's GHG Plan Level Quantification Guidance at section 1.4.3. This document may be found on the District's web site under CEQA Guidelines, Tools and Methodology.

Second, the CAP further states that emissions from industrial electricity and natural gas use, as well as Direct Access electricity use have not been included in the inventory. (Draft Climate Action Plan, July, 2010, at page 20.) The District can assist local governments in developing and providing non-proprietary GHG emissions data for industrial facilities that are permitted by the Air District.

### **Reduction Target**

It does not appear that the City's GHG emissions reduction target meets any of the three options provided in the District's CEQA Guidelines for establishing a GHG reduction target (BAAQMD CEQA Air Quality Guidelines, at page 4-10.) The emissions reduction target in the CAP aims to reduce GHG emissions by 25% below the City's 2005 business-as-usual inventory by 2020. The District's CEQA Guidelines recommend that a Qualified GHG Reduction Strategy, in this case the City's CAP, establish a target that is consistent with the goals of AB 32. The CAP should provide substantial quantitative evidence that the City's goal is consistent with AB32.

### **GHG Emissions Forecast**

The District recommends that the GHG emission projection, or forecast, for communities reflect a business-as-usual approach, in which emissions are projected in the absence of any policies or actions that would occur beyond the base year. Emission reductions from policies or actions that take place prior to the base would be accounted for in the business-as-usual forecast. It is unclear whether the City has followed this approach. For example, the CAP states at page 31 that, "*The City of Dublin has a high-density*

*residential land use designation, which allows 25.1+ dwelling units per acre*". If this land use designation was adopted prior to the 2005 base year, then any future developments adhering to it would be considered part of the business-as-usual forecast and the CAP should not use this policy as an emission reduction measure toward the 25% reduction goal.

The District understands that the CAP uses population and employment information based on growth-rate projections from the Association of Bay Area Governments (ABAG) *Projections 2005* report. The District recommends the CAP use the most recent demographic information available, which would be from ABAG's *Projections 2009* report.

### **GHG Reduction Measures**

A fundamental purpose of a Qualified GHG Reduction Plan is to evaluate and provide a range of possibilities and outcomes which would allow future projects to select mitigation measures that are most applicable and effective, sparing future projects from performing redundant analysis. The City may have unintentionally excluded feasible and effective reduction measures applicable to communitywide emission sources other than those listed in the CAP's Appendix D.

District staff recommends the City expand upon the measures identified in the CAP's Appendix D that, if implemented, would collectively achieve the specified emissions reduction goal. The current measures address only portions of communitywide emissions sources and may only apply to specific types of projects. For example, additional measures could include, but are not limited to, improving water efficiency, implementing additional transportation and land use measures, and requiring energy efficiency retrofits. See BAAQMD CEQA Air Quality Guidelines: Mitigating Plan-Level Impacts, beginning at page 9-8 for a list of specific measures that should be considered to reduce the City's GHG emissions.

The CAP repeatedly states that, "*Estimating the growth of City infrastructure or services was not within the scope of this project, and, therefore, this document does not include a forecast of government operations emissions. Consequently, the emissions reductions for this measure are not included as part of the reduction target.*" (Draft Climate Action Plan, July, 2010, at page 40.) Emissions from municipal operations are typically embodied in the communitywide inventory and forecast. Therefore, it is not necessary to develop a separate forecast for municipal operations in order to account for the emission reductions from municipal emission reduction measures. The District recommends the City quantify reductions from municipal operations measures and include those reductions in its accounting towards its GHG reduction target.

In addition, the District was unable to verify the applicability and effectiveness of some of the reduction measures included in the CAP. The Green Building Ordinance, as an example, listed under Energy Measures only applies to residential projects with 20 or more units. There is little detail provided as to how effective this ordinance has been in

the past or as to identifying the types of green building techniques that have been required. Similarly, it is unclear how many prior projects were not required to comply with the ordinance or how many future projects will likely be 19 units or less. While the CAP does provide some examples of past projects (*Id.* at page 34), it is uncertain if these examples are representative of the type and scale of new development Dublin can reasonably anticipate occurring in the future. The City should clarify how the standards in the Green Building Ordinance would apply to new residential development, thus ensuring the City is able to justify their estimated reductions credited by this strategy.

Regarding the CAP's reliance on measures implemented by the State, the emission reduction calculations for the CAP's stated measures are not transparent and verifiable. The emission reduction discussion for each measure should clearly state which emission sector the measure is targeting and how the emission reduction was calculated. For example, in the discussion on the state's Renewable Portfolio Standard, the CAP assumes that a 19% reduction in the City's 2020 electricity use emissions will result in a reduction of 33,594 MTCO<sub>2</sub>e/year in 2020. The CAP's inventory does not list the GHG emissions for the City's electricity sector for 2005 or 2020, making it unclear how the 19% reduction is being calculated for electricity use. The City's estimated electricity use reductions cannot be verified with the given information. Lastly, it is unclear how the CAP estimates emission reductions from AB 1493. The CAP should clearly list the total GHG emissions in the emission inventory's on-road passenger/light duty transportation sector and how a 15.75% emission reduction would result in a 46,034 MTCO<sub>2</sub>e/year reduction.

District staff recognizes that the Draft CAP includes valuable analysis and policies, and represents a significant commitment by the City. District staff is available to assist the City staff in addressing these comments. If you have any questions, please do not hesitate to contact Ian Peterson, Environmental Planner II, at (415) 749-4783.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

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