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October 7, 2014

Dana Armanino, Planner
Marin County Community Development Agency
3501 Civic Center Drive, Rm 308
San Rafael, CA, 94903

Subject: Draft Climate Action Plan

Dear Ms. Armanino,

Bay Area Air Quality Management District (Air District) staff has reviewed the County of Marin's (County) Draft Climate Action Plan (Plan). The Plan updates the County's 2006 *Greenhouse Gas Reduction Plan*, and outlines the County's long-term strategy for reducing communitywide greenhouse gas (GHG) emissions in the unincorporated portion of the County.

The County has already met the goal of the original 2006 plan by reducing GHG emissions 15% below 1990 levels. This is a notable achievement and puts the County at the forefront of community-based climate protection efforts in California. The current Plan expands this goal by setting a target of reducing GHG emissions 30% below 1990 levels by 2020. Air District staff understands that in setting this target, the County's intent is to be on a trajectory toward meeting the climate stabilization goal of an 80% reduction below 1990 levels by 2050 (Executive Order S-3-05 and Air District resolution 2013-11).

The Air District commends the County for addressing GHG emissions and supports the County's efforts in developing the Plan. The Air District has the following comments and suggestions to strengthen the Plan to increase the likelihood that the County's aggressive GHG reduction target will be met.

GHG Reduction Measures

The Plan includes a mix of voluntary and mandatory measures to reduce GHG emissions. The Air District has found that mandatory measures are often more effective at achieving their intended emissions reduction goals than voluntary measures. With this in mind, Air District staff suggests that the County change some of the measures in the Plan from voluntary to mandatory. In addition, we recommend that more specific actions be included in some of the measure descriptions so that it is clear exactly how each measure will achieve its stated GHG reduction goal. Here are some specific suggestions on how to address these comments:

- Measure *Trans-3.1 Off-Road Equipment* states that the County will adopt an ordinance or develop outreach programs that could require exterior

electrical outlets in all new construction. Air District staff recommends that this measure more explicitly state that the County will adopt an ordinance requiring new construction to include outdoor electrical outlets.

- Measure *Water/Wastewater-1.3 Additional Water Conservation for Existing Buildings* states that a new County program would use education and outreach and rebates to encourage existing buildings to exceed statewide requirements for water conservation. Air District staff recommends that this measure require such upgrades for all existing buildings when undergoing remodeling.
- Measures *Energy-3.3 Solar Installations for Existing Residential Development* and *Energy 3.4 Solar Installations for Existing Nonresidential Development* cite very large GHG emission reductions for voluntary solar programs. Air District staff suggests that the County either make these mandatory programs, such as requirements during remodels, or provide the basis for the assumptions that 20% of existing residential and 15% of existing commercial buildings will install solar photovoltaic systems.
- Measure *Trans-1.5 Transportation Marketing* also cites very large GHG emissions reductions for a program solely based on marketing and outreach. Air District staff suggests that the County better substantiate how providing marketing materials will result in actual behavior changes that reduce vehicle miles traveled (VMT) to the extent estimated.
- Measure *Waste-1 Zero Waste by 2025* states that the County will work with existing waste-related joint power authorities to “expand existing services” to meet an 83% diversion rate by 2020. Air District staff suggests that the County provide more specifics on the types of programs and services it plans to expand and use to achieve this goal.

Air District staff has also identified several measures that could be expanded upon to strengthen the Plan’s GHG reduction strategy. For example:

- Measure *Trans-1.3 VMT Reduction Monitoring and Implementation and Transportation Demand Management Program* requires transportation demand strategies that achieve a 10% reduction in VMT to be implemented in new residential developments of 25 or more units and new or expanded businesses of 50 or more employees. The types of transportation demand strategies listed in this measure can exceed a 10% reduction in VMT. Air District staff suggests that the County strengthen this measure to require a 20% reduction in VMT, which will better support the County’s efforts to achieve long-term GHG reductions.
- The Plan cites the agriculture sector as the third largest contributor to GHG emissions in the County, yet only has one measure to address emissions from agricultural sources is included in the Plan. Additional strategies the County could utilize to reduce emissions from this sector are listed in the Supporting Strategies section of the Plan. Air District staff recommends moving some of these measures

into the formal GHG reduction strategy, including *SP Agriculture-1 Marin Carbon Project* and *SP Agriculture-2 Best Management Practices for Agriculture*.

Monitoring and Implementation

The Plan contains a strong implementation program that includes conducting new emissions inventories in 2017 and 2019, and the development of new GHG reduction targets beyond 2020. The implementation program calls for “swift implementation upon adoption” and designates the County’s existing Sustainability Team to lead the implementation and adaptive management of the Plan. In addition to these efforts, Air District staff recommends the County develop a compliance checklist for new development projects to demonstrate consistency with the Plan. 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, Air District staff strongly recommends that annual tracking and reporting on the implementation of Plan measures be included in the Plan’s implementation strategy.

The Air District commends the County for addressing the critical issue of climate change through local action, and for the achievements the County has already made in reducing local GHG emissions below 1990 levels. By addressing the issues in this letter, Air District staff believes that the Plan would be more likely to achieve its GHG reduction target.

Air District staff is available to assist the County 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

cc: BAAQMD Director Susan Adams