



BAY AREA  
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DISTRICT  
SINCE 1955

October 28, 2010

Bill Wycko  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103-2479  
Subject: Draft GHG Reduction Strategy

Dear Mr. Wycko:

Bay Area Air Quality Management District (District) staff reviewed the City and County of San Francisco's (City's) Draft Greenhouse Gas Reduction Strategy (Strategy). We understand that the Strategy is a compilation of policies, programs and regulations that comprise San Francisco's greenhouse gas reduction efforts. The City's climate protection goal is to reduce the City's communitywide greenhouse gas (GHG) emissions 25% below 1990 levels by 2017. The Strategy includes a variety of documents characterizing the City's GHG emissions and describing approaches to reduce those emissions, including the City's Climate Action Plan.

The District applauds the City's proactive approach to reducing GHG emissions and supports its efforts in developing the GHG Reduction Strategy. The District's intent in creating the Qualified GHG Reduction Strategy as an operational threshold of significance in its CEQA Guidelines is to ensure that communities will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32. In its own GHG Reduction Strategy, the City has demonstrated that it is not only supporting the State in this endeavor, but is exceeding the State's own climate protection goals.

In some areas, the City has surpassed the minimum standard elements of a Qualified GHG Reduction Strategy as laid out in the District's CEQA Guidelines:

- the City's GHG reduction goal is more stringent than the State's AB 32 goal
- the City's 2008 GHG emissions inventory analysis and third party review indicates that the City is on track for meeting this aggressive target
- the City is committed to updating the GHG inventory every two years, exceeding the Guideline's recommendation that this be done a minimum of every five years
- the Strategy identifies 42 specific regulations required of new developments

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The District has the following suggestions for the City's future climate protection work:

- revise the 1990 community GHG baseline inventory to include emissions from the solid waste sector, wastewater/sewage treatment processes, and direct access electricity use (the District acknowledges that at the time the City conducted the 1990 baseline inventory, these sources of emissions were not typically included in all Climate Action Plans)
- extend the forecast/projection of emissions out to 2017 and 2020 in order to analyze progress toward meeting the City's 2017 target as well as the State's AB 32 goal
- ensure that emissions from policies adopted prior to the base year are not inappropriately credited against the target – only emission reductions due to expansions of policies, additional funding, etc. should be counted against the target, as the policies themselves would be considered “business as usual” when the baseline was conducted
- develop a mechanism to enable new projects to easily judge their consistency with the Strategy (for example, turn the tables in Chapter 9 into a project application checklist)

District staff believes the City's Strategy meets the criteria for a qualified GHG reduction strategy as described in the District's CEQA Guidelines. Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn. District staff looks forward to working with the City and County of San Francisco as you move forward with your climate protection efforts.

If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



JOS  
Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Chris Daly  
BAAQMD Director Eric Mar  
BAAQMD Director Gavin Newsom