



July 14, 2011

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

Robert Brown
Director
Community Development Department
City of San Rafael
1400 Fifth Avenue
PO Box 151560
San Rafael, CA 94901

Subject: Climate Change Action Plan

ALAMEDA COUNTY
Tom Bates
(Chairperson)
Scott Haggerty
Jennifer Hosterman
Nate Miley

Dear Mr. Brown:

CONTRA COSTA COUNTY
John Gioia
(Vice-Chair)
David Hudson
Mark Ross
Gayle B. Uilkema

Bay Area Air Quality Management District (District) staff reviewed the City of San Rafael's (City's) Climate Change Action Plan (Plan). We understand that the City developed and adopted the community-wide Plan in 2009, and is now seeking to amend the Plan by adding Appendix E: GHG Emissions Reduction Strategy to make it consistent with the District's CEQA Guidelines. The City's climate protection goal is to reduce greenhouse gas (GHG) emissions 25% below 2005 levels by 2020.

MARIN COUNTY
Harold C. Brown, Jr.

The District applauds the City's comprehensive approach to reducing 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 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 Climate Change Action Plan, the City has demonstrated that it is not only supporting the State in this endeavor, but is exceeding the State's own 2020 climate protection goals.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
John Avalos
Edwin M. Lee
Eric Mar

SAN MATEO COUNTY
Carole Groom
Carol Klatt

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. For example, the City's GHG reduction goal is more stringent than the State's AB 32 goal. In addition, the Plan contains a rigorous implementation strategy which includes identification of necessary staffing and funding sources, a monitoring and reporting mechanism to follow mitigation measure costs, implementation schedules and performance metrics, and regular reporting of Plan implementation to the Planning Commission, City Council and the public. We support the City's commitment to develop a checklist for new development projects to determine consistency with the Plan.

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Secretary)
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Sperring

SONOMA COUNTY
Susan Gorin
Shirlee Zane

The District has the following specific comments on the Plan.

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

The emissions inventory and business-as-usual forecast should be modified to include emissions from the Central Marin Sanitation Agency and off-road sources. Emissions from the Sanitation Agency should be apportioned by population, according to San Rafael's proportion of the Agency's service area. Countywide off-road emissions have

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been provided to the City by District staff, along with guidance on how to apportion these emissions down to the city level. By including these sources of emissions in the inventory and forecast, the City can take credit for any emission reductions from these sources due to its GHG mitigation measures.

We recommend that the City add text to the Plan stating that, should monitoring efforts find that the Plan is falling short of its goals, the City will add additional voluntary and mandatory measures to the Plan in order to meet the Plan's GHG reduction target. The District emphasizes the importance of monitoring the implementation of the GHG mitigation 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.

With the suggested changes identified above, the District believes that the City of San Rafael's Climate Change Action Plan would meet the standard elements laid out in the District's CEQA Guidelines for a Qualified GHG Reduction Strategy. However, the implementation and monitoring of the Plan noted above will be critical to the ability of subsequent projects to tier their GHG analysis required under CEQA.

San Rafael's Plan includes a broad list of GHG mitigation measures that address both existing and new development. However, we recognize that there are some 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:

- RECO/CECO (we understand that these policies are in development for future amendments of the Plan and encourage their consideration)
- TDM requirements of employers
- Parking pricing (unbundling from rents, permitting in residential areas, etc.)
- Water conservation requirements on new construction and remodels (we understand that the City adopted a water conservation ordinance in 2010; by including the ordinance in the Plan, resulting emission reductions could be quantified and applied toward meeting the GHG reduction target)

Aggressive GHG reduction targets and comprehensive strategies like San Rafael'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 of San Rafael 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,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Hal Brown