



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

March 15, 2011

Lauren Barr  
Senior Planner  
City of San Ramon  
2222 Camino San Ramon  
San Ramon, CA 94583

Subject: Climate Action Plan

Dear Mr. Barr:

ALAMEDA COUNTY  
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(Chairperson)  
Scott Haggerty  
Jennifer Hosterman  
Nate Milely

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John Gioia  
(Vice-Chair)  
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(Secretary)  
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SOLANO COUNTY  
James Sperring

SONOMA COUNTY  
Susan Gorin  
Shirlee Zane

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

Bay Area Air Quality Management District (District) staff reviewed the City of San Ramon's (City's) Climate Action Plan (Plan). The Plan is a companion to the General Plan 2030 and was included in the environmental review of the General Plan. We are commenting on the Plan at this time because the City is conducting a public review process for the General Plan. The City's climate protection goal is to reduce community-wide greenhouse gas (GHG) emissions 15% below 2008 levels by 2020.

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. With its Climate Action Plan, the City has demonstrated that it is supporting the State in this endeavor.

The Plan includes a comprehensive approach to addressing GHG emissions from new development. The District agrees with the City's conservative approach of not quantifying emission reductions from voluntary measures, as the City has less control and less certainty over the implementation of these measures. The implementation strategy includes good use of indicators, performance targets and benchmarks, as well as acknowledgement of the importance of annual monitoring of the Plan's implementation.

The District has the following specific comments on the Plan.

Emissions Quantification

With regard to VMT data, we understand that growth in VMT has been adjusted down for the 2020 business-as-usual forecast compared to the July 2010 version of the Plan. This is a result of the new modeling that MTC is doing, which utilizes new economic forecast data developed by ABAG. Because this data is still in a draft state and has not yet been approved by MTC's Commission or ABAG's Board, the District recommends that the final version of the CAP reflect

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the transportation data that was previously used in the January 14, 2011 version of the CAP. However, if the new data from MTC is used, it will be very important to monitor closely actual VMT growth to observe whether growth actually matches the forecasting provided by MTC.

### Emission Reduction Measures

The Plan contains a good number of voluntary measures that are not counted toward the GHG reduction target. The District supports this conservative quantification approach. However, to help ensure CEQA streamlining and tiering from the Plan, the City should make as many of these voluntary measures mandatory as possible, by changing language such as “encourage,” “promote,” and “permit,” to “require,” “adopt,” and “implement,” as it is easier for future projects to demonstrate compliance with mandatory than voluntary measures.

The Plan relies heavily on statewide measures to achieve the GHG reduction target. Such extensive reliance on state level action to achieve the target may jeopardize the City’s ability to achieve its target should any of the state measures fall short of full implementation. To protect against this, the City should include additional locally-enforced measures in the Plan.

While the Plan does a good job of addressing GHG emissions from new development, climate action plans provide an opportunity to address emissions from existing development as well. While we are encouraged that the most recent version of the Plan has incorporated additional measures targeting existing development, the District recommends that the Plan include additional mandatory measures that are found in many other climate action plans to address these existing sources of emissions. Specifically, the City should include the following types of measures:

- a time-of-sale (RECO/CECO) energy efficiency requirement that exceeds Title 24 for existing development;
- parking strategies such as pricing, eliminating minimum requirements for new development, and unbundling parking costs from rents;
- a transportation demand ordinance that requires existing as well as new employers to provide transit subsidies, guaranteed rides home, parking cash-out, etc.;
- expansion of the Rideshare program to include preferential parking for rideshare vehicles, mandatory inclusion of ridesharing in employer TDM programs (for existing and new employers), etc.

The implementation section of the Plan is strong. However, with the large number of voluntary measures, it may be difficult to ensure that new projects are adequately integrating all the relevant measures into their projects. The District suggests developing a checklist or similar tool that enables project developers to see all the mandatory and voluntary measures included in the Plan that apply to their project, and which enables the City to ensure that all projects are incorporating all relevant measures as part of the project approval process. I have included a sample compliance checklist used by the City and County of San Francisco for just this purpose.

With the recommended changes identified in this letter, the District believes that this Plan would meet the minimum standard elements of a Qualified GHG Reduction Strategy identified by the Office of Planning and Research and the District CEQA Guidelines.

Aggressive GHG reduction targets and comprehensive strategies like San Ramon'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 Ramon as you move forward with this climate action plan.

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 John Gioia  
BAAQMD Director David Hudson  
BAAQMD Director Mark Ross  
BAAQMD Director Gayle Uilkema