



BAY AREA
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DISTRICT
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October 6, 2010

Carmela Campbell
City of Union City
Economic and Community Development
34009 Alvarado-Niles Road
Union City, CA 94587

Subject: Union City Draft Climate Action Plan Initial Study/Proposed Negative Declaration

Dear Carmela Campbell:

Bay Area Air Quality Management District (District) staff reviewed the City's Draft Climate Action Plan (CAP) and Initial Study/Proposed 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 20% below 2005 levels by 2020. 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 developing the CAP. With full implementation of this CAP, Union City will reach a 22% reduction in GHG by 2020 through measures addressing land use, transportation, and building energy efficiency, among others. This comprehensive effort will guide Union City towards important GHG reduction goals, help the Bay Area reach the State's AB32 GHG reduction goals, and serve as a model for other communities to follow.

In general, please note that emission reductions from policies adopted prior to the 2005 emissions inventory base year should be included in the business-as-usual scenario and not included as part of the emission reductions captured due to the CAP. Only emission reductions due to expansions of such policies or additional funding should be considered emission reductions captured by the CAP.

Based on a review of the CAP, it isn't apparent if there are any industrial users of electricity in Union City that by-pass PG&E and purchase energy directly from wholesalers. If there are such wholesale purchases, this energy use should be included in the emissions inventory. In addition, the methane from wastewater treatment should be included in the emissions inventory.

Even with these minor adjustments to the emissions inventory, it is likely that the CAP will meet the BAAQMD's thresholds of 15% below baseline emissions by 2020.

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Future land development projects may seek to demonstrate that their GHG emissions are less than significant based on consistency with the Union City CAP. To assist with this determination, staff recommends that the City develop a mechanism, such as a checklist, to enable new projects to quickly establish consistency with the CAP.

District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Alison Kirk, Senior Environmental Planner, at (415) 749-5169.

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