



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 14, 2014

Lee Diaz
Associate Planner
City of Pacifica
Planning and Economic Development Department
1800 Francisco Blvd.
Pacifica, CA 94044

Subject: City of Pacifica Climate Action Plan

Dear Mr. Diaz,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Pacifica's (City) Climate Action Plan (Plan). The Plan is intended to guide the development, enhancement, and implementation of actions to reduce greenhouse gas (GHG) emissions in the City. Air District staff commends the City's initiative in addressing GHG emissions and supports the City's efforts in developing a climate action plan. Air District staff has the following specific comments on the City's Plan.

We commend the City for its ambitious GHG reduction target of reducing community-wide GHG emissions 35 percent below 2005 levels by 2020 and 80 percent below 1990 levels by 2050. Air District staff recommends the City strengthen its GHG reduction approach to ensure the Plan meets the City's near-term 2020 target. Meeting the City's 2020 target will support progress toward the City's as well as the State's and Air District's climate stabilization goal of an 80 percent GHG reduction below 1990 levels by 2050 (Executive Order S-3-05, Air District Resolution).

Staff recommends that the Plan demonstrate how the measures in the Plan will achieve the City's 2020 GHG reduction target. To demonstrate that this target is met, the emission level in the target year should be equal to or lower than the target amount, as demonstrated in Table 15 in the Plan. However, target year level emissions should be represented by annual measure reductions, not multi-year, aggregated reductions (a cumulative approach). For example, if a household produces 10 tons of GHG emissions in 2005 and in 2010 completes energy efficiency upgrades that decrease emission to 8 tons, the annual emission reduction for the household is two tons. If no further emission reduction strategies are implemented, then in 2020 the annual reduction remains two tons, not 20 tons (10 years * 2 tons). The City's Plan has taken the multi-year aggregated approach which assumes very large reductions by 2020. This approach misrepresents the estimated GHG emission reductions in 2020 and does not support the City's conclusion that GHG emissions in 2020 will meet the reduction target.

Staff recommends that the Plan include information on how GHG reductions were calculated for each measure to better understand the assumptions made and implementation actions the City will need to take. Staff finds that many measures are not supported by specific implementation actions and assumptions. The GHG

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reduction estimates for certain measures appear to be overestimated. For example, the smart growth development measure is estimated to reduce community-wide vehicle miles traveled by over 40 percent and reduce the City's total GHG emissions inventory by 46 percent. Based on staff's review of many climate action plans, these reduction estimations seem unlikely to be achieved, especially since the Plan does not provide implementation actions or assumptions to support the stated reductions. The water conservation ordinance measure also seems to be grossly overestimated. The measure states that the City will adopt the Bay Area Water Supply and Conservation Agency's indoor and outdoor ordinances and CalGreen water conservation standards; both of which apply to new construction and remodels only. However, in the emission reduction calculation, the City assumes that all households, new and existing, will comply with the ordinance (based on a preliminary worksheet shared with Air District staff). If this is the case, we recommend that the City modify this measure to make water conservation strategies mandatory for all existing buildings and include enforcement mechanisms to support the estimated GHG reductions. We recommend that the Plan specify the policies, programs, and timelines for how emissions reduction measures will be implemented in order to credit reductions toward the City's GHG targets.

Air District staff understands that the Plan follows the RICAPS (Regionally Integrated Climate Action Planning Suite) template developed by the City/County Association of Governments of San Mateo County. Staff recommends that the Plan discuss any variations between the RICAPS calculation methods and assumptions and those used in the Plan. For example, RICAPS assumes a 15 percent energy savings for energy efficiency measures and the Plan assumes 25 percent energy savings for the same measures (based on the preliminary worksheet shared with Air District staff).

Staff identified additional feasible measures that have proven effective at reducing GHG emissions in other jurisdictions that have not been included in the Plan and would help the City meet its aggressive 2020 target.

- Add a time of sales energy efficiency upgrade requirement to residential and commercial buildings, such as a residential/commercial energy conservation ordinance (RECO/CECO).
- Add transportation demand management measures to include strategies such as ensuring that employers participate in the Bay Area Commuter Benefit Program; establishing park and ride lots; and enhancing bicycle and pedestrian connections to transit.
- Add a measure to promote electric and alternative fuel vehicles including strategies such as requiring new developments to install electric vehicle charging stations.

Air District staff identified an inconsistency in the Plan's emission forecast. According to the Plan, the City's residential electricity use increased 7.7% from 2003 to 2007, equal to a 1.54 annual percent increase in residential electricity use. However, in forecasting residential electricity sector emissions, the Plan projects residential electricity use based on a population projection that estimates a significantly lower annual growth rate of 0.10 for 2005 to 2020, rather than actual electricity use patterns. Staff recommends that the Plan use consistent factors in forecasting GHG emissions.

Staff agrees with the Plan's monitoring policy to issue an annual climate action plan implementation report to update the City Council and public on progress. Staff recommends that the City prepare a Plan compliance checklist for new developments to track and ensure that Plan measures are being implemented as required or proposed.

We commend the City for addressing the critical issue of climate change through local action. By addressing the issues in this letter, we believe that the City's Climate Action Plan would more likely achieve its GHG reduction target and that the City will be in a better position to use the CAP as a tierable document under CEQA.

Air District staff is available to assist the City in addressing these comments. If you have any questions, please contact Sigalle Michael, Senior Planner, at (415) 749-4683 or smichael@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Carole Groom
BAAQMD Director Carol Klatt