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AIR QUALITY  
MANAGEMENT  
DISTRICT  
SINCE 1955

February 22, 2012

Matt Huffaker  
Assistant City Manager  
City of Walnut Creek  
1666 North Main Street  
Walnut Creek, CA 94596

Subject: City of Walnut Creek Draft Climate Action Plan

Dear Mr. Huffaker:

Bay Area Air Quality Management District (District) staff has reviewed the City of Walnut Creek's (City) Draft Climate Action Plan (Plan). District staff understands that the goals and policies of the Plan are being incorporated into the City's General Plan (2006) through a General Plan Environmental Impact Report Addendum (Addendum), and that it is the City's intention that the Plan will serve as an implementing tool of the General Plan. The City's climate protection goal is to reduce greenhouse gas (GHG) emissions 15% below 2005 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 hope is that communities throughout the Bay Area will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32 and beyond.

The District has the following comments on the Plan.

GHG Emissions Inventory and Forecast

The GHG emissions inventory that was conducted for base year 2005 should have included GHG emissions from wastewater processing and water treatment. In its *GHG Plan Level Quantification Guidance*, the District states that methane and nitrous oxide emissions associated with sewage and wastewater treatment processes should be included in the community-wide GHG inventory. The District recommends that the GHG emissions inventory and forecast be expanded to include this source of emissions.

GHG Emission Reduction Measures

Air District staff believe that the City may have overestimated the emission reductions anticipated from measure TLU 2.2: Jobs/Housing Balance. This measure assumes a high level of emission reduction from increasing employment opportunities for local residents. In fact, this one measure represents 36% of the total GHG emission reductions attributed to local measures by 2020. The implementation actions identified in this measure are speculative rather than specific, and thus the emission reduction estimate appears overly optimistic. The

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GHG emission reductions for this measure should be re-evaluated according to concrete actions the City will take to increase the jobs/housing balance beyond that which would be achieved under current growth trends. The CAP should only account for GHG reductions that would not have occurred but for the City's actions outlined in this measure. Uncertainties with regard to economic growth and the implementation of regional goals such as the Sustainable Communities Strategy should be factored into a conservative approach to quantifying emission reductions from this measure. If such re-evaluation leaves the Plan short of meeting its emission reduction target, there appear to be ample opportunities for the Plan to strengthen other proposed measures to make up for a possible shortfall (see below).

Because measure TLU 2.2 represents such a large portion of the local GHG emission reductions, until the issues with this measure noted above are resolved, the District cannot determine whether the Plan meets the minimum standard elements of a *Qualified GHG Reduction Strategy* as defined by the District's CEQA Guidelines.

### Strengthening the GHG Reduction Strategy

In addition to measure TLU 2.2, the Plan's heavy reliance on state level action to achieve the reduction target leaves the City open to failing to achieve its target should any of the state measures fall short of full implementation or fail to meet their intended GHG reduction goals. For example, the Plan assumes full implementation of the California Renewables Portfolio Standard (RPS) by 2020. However, PG&E is currently performing below its expected level under the RPS. The District recommends the City strengthen the locally-implemented GHG reduction measures in the Plan in order to protect against similar potential shortfalls. The District recommends adding mandatory measures that are found in many other climate action plans, such as:

- Expansion of TLU 1.2: Transportation Demand Management (TDM) from a voluntary measure to requiring large employers (50+ employees) to offer TDM programs to their employees, such as flex-time, vanpool and carpool assistance, transit subsidies and commuter benefit programs;
- Adopt a commuter benefit ordinance requiring employers to offer employees the ability to use pre-tax wages for transit passes or vanpooling;
- Cool roofing and cool paving requirements on new development and remodel/repaving projects to mitigate urban heat islands;
- Unbundle parking costs from residential and commercial rents;
- Water conservation requirements on new construction and remodels that meet CalGreen Tier 1 or 2 requirements.

The Plan's Implementation Section states, "*If the City determines during annual review that the City is falling short of reduction targets, the City will create additional voluntary and mandatory measures to attain the City's overall reduction goals.*" The District acknowledges this important emphasis on 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.

The District appreciates the early and regular communication that City staff and their consultants have provided to the District during the development of the Plan. City staff has been very helpful and responsive in discussing and addressing these issues with District staff. District staff is available to assist City staff in addressing these comments. If you have any questions, please contact Abby Young, Principal Environmental Planner, (415) 749-4754.

Sincerely,



Jean Roggenkamp  
Deputy Air Pollution Control Officer

cc: BAAQMD Chair John Gioia  
BAAQMD Director David Hudson  
BAAQMD Director Mary Piepho  
BAAQMD Director Mark Ross