



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

August 22, 2016

Lina Velasco, Project Manager II
Richmond City Hall
Planning Division
450 Civic Center Plaza
Richmond, CA 94804

Subject: Draft Climate Action Plan

Dear Ms. Velasco,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of Richmond’s (City) Draft Climate Action Plan (Plan). While the Plan is a multi-objective plan that addresses environmental, social and economic issues related to climate change, the Air District’s review focuses on the City’s strategies for reducing communitywide greenhouse gas (GHG) emissions in Richmond.

Air District staff commends the City’s commitment to climate action and its initiative in addressing GHG emissions. In particular, we commend the City for the Plan’s commitment to strategies and actions that serve to enhance and leverage State policies and programs. The Plan clearly captures the various sectors in which local action will be critical for reducing GHG emissions to the levels required to achieve GHG targets, and indicates the multiple steps required to implement these actions.

The City anticipates very aggressive emission reductions from the Plan’s overall measures and actions. By 2020, the Plan estimates emission reductions equivalent to nearly 25 percent of total GHG emissions in 2012. More notably, the Plan expects that these strategies will result in a 70 percent reduction below 2012 GHG emission levels by 2030.

The likelihood of achieving such aggressive reductions should be tempered by the challenges the Plan will face in achieving full implementation of all its measures. First, many of the measures outlined in the Plan are voluntary; the Air District has found that mandatory measures are often more effective at achieving their intended emissions reduction goals than voluntary measures. Second, as the Plan itself acknowledges, successful implementation of these measures requires a complex interplay of commitment and coordination from various City staff, action at the state and regional levels, active participation by the community, availability of funding, and new or updated city codes and ordinances.

For example, over 50 percent of the emission reductions forecast by 2030 are associated with **Objective 1. Energy Efficient Buildings and Facilities** and the four strategies in support of this objective. In turn, more than half of these emission reductions hinge on improving the energy efficiency of all existing

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buildings by 50 percent by 2030 (*Strategy EE.1 - Leverage Existing Programs and Rebates to Improve Efficiency of Existing Buildings*), in line with the goal of SB 350. This measure depends largely on voluntary participation in efficiency incentive programs; including mandatory elements would increase the likelihood of this measure's achieving such a high participation rate and its stated GHG reduction goal.

Similarly, the remaining emission reductions under this objective are attributed to the promotion of green buildings (*Strategy EE.3 - Promote Green Building*). This strategy hinges on Title 24 being modified to require all new residential buildings be zero-net energy (ZNE) by 2020 and all new commercial buildings be ZNE by 2030. But, as the Plan itself notes, Title 24 has yet to establish this requirement; if Title 24 is not modified, the City would need to pass a green building ordinance establishing similar requirements. Without a mandated ZNE requirement, the emission reductions expected from this measure are overly optimistic.

Given the challenges that the City will face in meeting the emission reductions outlined in the Plan, it is critical to have a robust implementation and monitoring program. Therefore, the Air District commends the City for its commitment to updating the City's GHG inventory every other year and to using the tracking metrics outlined in the Plan to gauge the progress of implementation of the Plan's local measures. Other vital elements include monitoring progress of GHG reductions against the 2020 and 2030 targets and adjusting strategies and action as needed to reach these targets.

The Air District supports the City's efforts in developing the Plan and commends the City for addressing the critical issue of climate change through local actions. If the City intends to use the Plan as a tierable document under CEQA, it is critical that the emissions reductions contained in the Plan be met. By addressing the issues in this letter, Air District staff believes that the Plan would be more likely to achieve its GHG reduction target and that the City would be in a better position to use the Plan 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 do not hesitate to contact Geraldina Grünbaum, Senior Environmental Planner, at (415) 749-4956 or at ggrunbaum@baaqmd.gov.

Sincerely,



Jean Roggenkamp
Deputy Executive Officer

cc: BAAQMD Director John Gioia
BAAQMD Secretary David Hudson
BAAQMD Director Karen Mitchoff
BAAQMD Director Mark Ross