



**BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT**

August 24, 2020

Rebecca Parnes  
City of Dublin  
100 Civic Plaza  
Dublin, CA 94569

RE: Dublin Climate Action Plan 2030 and Beyond

Dear Ms. Parnes,

Bay Area Air Quality Management District (Air District) staff has reviewed the Initial Study – Negative Declaration (IS-ND) for the Dublin Climate Action Plan 2030 and Beyond (CAP 2030). The City of Dublin proposes to adopt the CAP 2030 to reduce communitywide greenhouse gas (GHG) emissions by 48,058 MTCO<sub>2</sub>e by 2025, and 73,452 MTCO<sub>2</sub>e by 2030, to achieve the goal of reducing GHG emissions to 40% below 1990 levels by 2030. CAP 2030 is also intended to set the City on the path to achieve carbon neutrality by 2045. In 2028, City staff will initiate the development of a new CAP to establish new strategies and measures to ensure its 2045 carbon neutrality goal is achieved. CAP 2030 and the Draft IS-ND would, if approved, also be useful in streamlining CEQA review for projects that are consistent with the CEQA GHG Emissions Analysis Compliance Checklist. The CEQA GHG Emissions Analysis Compliance Checklist is a proposed City of Dublin CEQA GHG Emissions Analysis Compliance Checklist for proposed projects, to ensure consistency with the City’s proposed quantitative CEQA GHG Emissions Thresholds, for use in evaluating whether a plan or project’s GHG emissions would result in a potentially significant environment impact under CEQA.

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**Air Quality**

Though Air Quality impacts were determined to be less than significant, and due solely to measures involving the installation of clean technology and other strategies to promote GHG reductions, Air District staff encourages the City to consider the following for all construction projects associated with CAP 2030 implementation to further mitigate GHGs and protect public health from air pollutants from construction equipment:

- **Require construction vehicles to operate with Tier 4** or the highest tier engines commercially available.
- **Require Basic Construction Mitigation Measures for all construction projects (Table 8-2), and require Additional Construction Mitigation Measures for Projects with Emissions Above the Threshold** included in the Air District’s CEQA Guidelines:

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

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Bay Area Air District:



[https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en)

- **Review the Air District’s CEQA website which contains tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** These tools include guidance on quantifying local emissions and exposure impacts and can be found on the Air District’s website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>. If the Plan requires a site-specific analysis, please contact Air District staff to obtain the most recent data.

### **Greenhouse Gas Emissions**

Air District staff commends the City of Dublin in establishing targets in CAP 2030 that align with the State’s SB 32 GHG reduction goals for 2030, and discussing how the CAP 2030 provides a pathway—though not quantified—toward meeting the State’s goal of carbon neutrality by 2045 (Executive Order B-55-18). Throughout the document, the City states that as implementation of CAP 2030 progresses, regular assessments will be performed to determine progress toward the 2030 and 2045 targets and enable adjustments to be made including the adoption of additional mandatory measures. The inclusion of a well-articulated vision (Section 1.0 What Will Dublin Look Like?) helps communicate the intent and targets of CAP 2030 and provides a reference point for public engagement. The Air District included a similar vision section in its 2017 Clean Air Plan and has found it to be very useful in helping communicate the goals and action strategy of the Clean Air Plan. Air District staff offers the following comments both in support of, and to strengthen, GHG mitigations in CAP 2030:

- Through measure CF-1: Opt-Up to 100% Renewable and Carbon-Free Electricity, CAP 2030 identifies opting up all community electricity accounts to East Bay Community Energy’s Renewable 100% product as the lead measure for reducing GHG emissions. Staff concurs that this is an important and aggressive strategy to meeting the City’s GHG reduction goals. With 100% renewable electricity, CAP 2030’s measures to electrify new construction and existing building stock—through measures EE-1: Achieve All-Electric New Building Construction and EE-4: Develop an Existing Building Electrification Plan—will have a significant impact on GHG emissions. Staff strongly advises the City to implement these measures as broadly as possible, capturing all building types and using mandatory approaches to ensure compliance. Staff also encourages the City to visit the Clean Building Compass, a web-based tool the Air District recently launched as a resource for local governments which includes information on

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model policies and practices:  
<http://www.buildingdecarb.org/compass.html>.

- CAP 2030 includes an aggressive approach to building out the electric vehicle (EV) charging infrastructure, including a mandatory ordinance that would require all new commercial and multifamily buildings to include 25% of parking spaces as “EV Ready” (conduit and electrical panel capacity installed), and 3% of parking spaces required to have operable Level 2 EV charging stations. This exceeds the requirements of California’s CalGreen Tier 2 building code and supports the Air District’s efforts to achieve a goal of 90% of vehicles in the Bay Area being zero emissions by 2050.
- CAP 2030 includes measure SM-3: Develop a Transportation Demand Management Plan which includes a variety of strategies to reduce vehicle trips and vehicle miles traveled (VMT). Staff suggests the City add to this measure a discussion of how COVID-19 shelter-in-place policies have changed traditional commute patterns, and include strategies designed to optimize trip reduction impacts from shelter-in-place into the future, such as greater emphasis on remote work and active transportation. While this period of time is challenging, it provides opportunities to rethink local circulation patterns and mode shifting. Staff encourages the City to incorporate Air District efforts into new strategies, including the Commuter Benefits Program (<https://www.baaqmd.gov/rules-and-compliance/commuter-benefits>) and the Cut the Commute Pledge (<https://www.sparetheair.org/reduce-your-impact/cut-the-commute/take-the-pledge>).
- Measure MM-1: Achieve the Organic Waste Reduction Requirements of SB 1383, provides a general description of actions the City will take to develop policies and practices to meet the State’s organics waste diversion goals under AB1383. CAP 2030 estimates GHG reductions that will occur assuming the City meets the AB1383 waste diversion goals. Without clearer identification of specific actions the City will take to meet these goals, there is great uncertainty these goals can be met. Staff acknowledges this measure states the City will “adopt a plan and associated policies/ordinances required for the successful implementation of SB 1383.” However, staff suggests CAP 2030 include a more specific description of the types of policies and ordinances the City will consider.
- Overall, this is a strong and thoughtful plan that reflects innovative thinking, including looking at lifecycle costs and embodied emissions of new projects. The monitoring plan includes three-year GHG inventories and annual assessments of measures with the goal of

adjusting mid-stream as necessary to meet the 2030 target. Staff recommends that the City identify a staff position that is entrusted with the coordination and implementation of the Climate Action Plan. Experience has shown that jurisdictions that have dedicated staff to implement their climate action plans have greater success in progressing towards their GHG reduction targets. Staff also recommends CAP 2030 include a checklist for new projects to demonstrate consistency with the plan.

Air District staff commends the City for addressing the critical issue of climate change through local action and for the achievements the City has already made in reducing GHG emissions. By addressing the issues and suggestions in this letter, Air District staff believes that CAP 2030 would be more likely to achieve its GHG reduction target, thereby being in a better position to support streamlining for future projects under CEQA.

### **Environmental Justice**

Air District staff also commends the City for calling out the climate co-benefit of equity and inclusion in CAP 2030, and specifically community-driven climate resilience planning approaches. In addition to this co-benefit and these considerations, Air District staff recommends applying an equity lens when implementing CAP 2030 and conducting a Racial Equity Impact Assessment of CAP 2030. The City of Oakland conducted a Racial Equity Impact Assessment and Implementation Guide which can serve as a good, local example and is located here: <https://www.oaklandca.gov/documents/racial-equity-impact-assessment-and-implementation-guide>. In addition to these overarching recommendations, Air District staff recommends the following to strengthen equity throughout CAP 2030:

- **Consider the cumulative impact, and potential unintended cost or displacement impacts,** on communities when implementing CAP 2030 measures.
- **Ensure CAP 2030 is integrated and aligned with the City of Dublin's General Plan,** specifically for equity considerations and outcomes.

Air District staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Kelly Malinowski, Senior Environmental Planner, at (415) 749-8673 or [kmalinowski@baaqmd.gov](mailto:kmalinowski@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

CC: BAAQMD Director John J. Bauters  
BAAQMD Director Pauline Russo Cutter  
BAAQMD Director Scott Haggerty  
BAAQMD Director Nate Miley