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Bay Area Air District:



October 14, 2020

Meenaxi Raval  
Department of Planning, Building and Code Enforcement  
City of San Jose  
200 East Santa Clara Street, 3rd Floor Tower  
San Jose, CA 95113-1905

RE: San Jose 2030 Greenhouse Gas Reduction Strategy

Dear Ms. Raval,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of San Jose's 2030 Greenhouse Gas Reduction Strategy (Strategy) and the Initial Study/Addendum to the Envision San Jose 2040 General Plan EIR and the General Plan Supplemental EIR. The City's update to the original Strategy reflects the plans, policies, and codes adopted to reduce emissions levels to 40 percent below 1990 levels by 2030 per Senate Bill (SB) 32. As the City intends to use the updated Strategy as a Qualified Climate Action Plan to tier and streamline CEQA review for projects consistent with the Strategy, the City has also prepared a Development Compliance Checklist.

Air District staff commends the City for updating the Strategy to reflect the State's SB 32 greenhouse gas (GHG) reduction goals for 2030. Given the urgency to address the climate crisis, the Air District also urges the City to look beyond 2030 and align the Strategy with Executive Order (EO) B-55-19 to achieve carbon neutrality as soon as possible and no later than 2045. Air District staff offers the following comments both in support of and to strengthen the Strategy:

- The Strategy includes measures addressing GHG emissions from buildings, waste, and other sectors. However, Appendix C of the Strategy refers to other City plans for much of the supporting quantitative analysis for the GHG emission reduction estimates associated with the measures. The inability to access full quantitative analysis within the Strategy documents makes it difficult to judge whether the measures included in the Strategy will achieve the Strategy's target or not, thus weakening the Strategy's ability to support tiering under CEQA. Staff recommends the Strategy include either a full quantitative analysis justifying the emission reduction estimates for each GHG reduction measure, or a hyperlink or specific page reference to where the analysis can be found in other City plans and documents.

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- Air District staff strongly urges the City to include specific measures for data centers in Chapters 3.4 and 4.1 of the Strategy. These measures could include eliminating the use of diesel back-up generators, achieving an industry best practice Power Usage Effectiveness (PUE) no greater than 1.1, use of low-GWP refrigerants, and commitment to serving baseload power with zero-emitting resources. Such measures could be incorporated into the existing discussion around building electrification (GHGRS #2), building retrofits (GHGRS #4), and San Jose Clean Energy providing carbon-free power (GHGRS #1).
  - The Air District supports the inclusion of important mandatory measures, such as an energy efficient reach code and natural gas prohibition for new construction. The Air District also recognizes that many of the measures included in the Strategy are not bound by timeframes or are framed as voluntary. For example, GHGRS #4 includes a 3 percent reduction citywide in natural gas use below 2017 levels, but it's unclear when this reduction will occur. Likewise, GHGRS #4 mentions that the "city can also consider support for residents" to replace fossil fuel back-up generators; this measure should be strengthened by including language to mandate this action. The Air District has found that mandatory measures are often more effective at achieving the expected emissions reductions than voluntary measures. The Air District recommends the Strategy includes stronger language that affirms the City's desire that voluntary measures be implemented.

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 comments in this letter, Air District staff believes that the City's GHG Reduction Strategy would be more likely to achieve the GHG reduction target, thereby better positioned to support streamlining for future projects under CEQA.

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 Jakub Zielkiewicz, Advanced Projects Advisor, at (415) 749-8429 or [jzielkiewicz@baaqmd.gov](mailto:jzielkiewicz@baaqmd.gov), or Abby Young, Climate Protection Manager, at (415) 749-4754 or [ayoung@baaqmd.gov](mailto:ayoung@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

cc: BAAQMD Director Margaret Abe-Koga  
BAAQMD Vice Chair Cindy Chavez  
BAAQMD Director Liz Kniss  
BAAQMD Chair Rod G. Sinks