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February 16, 2022

Christian Murdock, AICP  
Deputy Director of Planning  
City of Pacifica Planning Department  
540 Crespi Drive  
Pacifica, CA 94044

RE: Pacifica General Plan Update and Draft Environmental Impact Report

Dear Mr. Murdock,

Bay Area Air Quality Management District (Air District) staff has reviewed the Pacifica General Plan Update (General Plan) and Draft Environmental Impact Report (DEIR). The General Plan is a policy document to guide the City's actions through 2040 regarding economic sustainability, community design, land use, transportation/circulation, open space, community facilities, conservation, safety, and noise. The Planning Area encompasses approximately 13.5 square miles, including the entirety of the City as well as 606 acres of unincorporated land south of City Limits that represents the probable future physical boundaries and service area of the City.

Air District staff commends the City for their inclusion of increased housing density, and increased bike/ped mobility throughout the General Plan as helpful elements to minimize regional vehicle miles traveled and associated emissions. Air District staff recommends the General Plan and/or DEIR include the following information and analyses related to energy and greenhouse gas (GHG) emissions:

**The GHG impact analysis should include an evaluation of the General Plan's consistency with the California Air Resources Board's most recent Assembly (AB) 32 Scoping Plan and with the State's 2030, 2045, and 2050 climate goals.** The Air District's current GHG thresholds and CEQA Guidelines are based on the State's 2020 targets which are now superseded by the 2030 targets established in SB 32. The Air District recommends that cities and counties evaluate such plans based on whether they would support California's long-term climate goals of achieving carbon neutrality by 2045, as defined in Executive Order B-55-18, including reducing GHG emissions in the relevant jurisdiction to meet an interim milestone of 40 percent below 1990 emission levels by 2030, consistent with SB 32.

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

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**CEQA requires local agencies to consider alignment of local plans with federal, state and local energy and climate policy; thus, the relevant plans and programs discussed in the General Plan and DEIR must reflect the most recent information.**

Several references to such goals, plans, rules, and programs in the General Plan and DEIR are outdated. Air District staff recommend that the following references be updated as follows:

- Revise Air District 2010 Clean Air Plan to the 2017 Clean Air Plan;
- Revise California 2020 GHG reduction goal to California GHG reduction goals for 2030, 2045 and 2050;
- Revise Low Carbon Fuel Standard (2007) carbon intensity reduction goals of 10% to 20% per 2018 CARB amendments to the regulation;
- Revise AB 32 (2006) to SB 32 (2016), and the California Climate Change Scoping Plan 2008 and 2014 versions to the 2017 Scoping Plan;
- Revise EPA GHG Regulation of Cars and Light Duty Trucks covering model years 2012 through 2016 to the model years 2023 through 2026;
- Revise Executive Order 13154 Federal Leadership in Environmental, Energy, and Economic Performance (revoked in March 2015) to Executive Order 13693 Planning for Federal Sustainability in the Next Decade;
- Revise Draft Plan Bay Area 2050 to Plan Bay Area 2050 (adopted by MTC/ABAG in October 2021).

**Air District staff recommends that the General Plan include additional feasible measures to minimize GHGs within the City.** Examples of potential emission reduction measures that should be evaluated and considered, include but are not limited to:

- Including electric infrastructure and fossil fuel alternatives in the development and operation of the Plan, such as solar photovoltaic (PV) panels, renewable diesel, electric heat pump water heaters, and solar PV back-up generators with battery storage capacity.
- Expanding the requirements for no natural gas use to all new residential and commercial construction, with no exemptions for gas cooking and residential fireplaces
- Prohibiting or minimizing the use of diesel fuel, consistent with the Air District's Diesel Free By '33 initiative (<http://dieselfree33.baaqmd.gov/>).
- Meeting the vehicles miles traveled (VMT) requirement under SB 743 per the California Office of Planning and Research (OPR) *Technical Advisory On Evaluating Transportation Impacts In CEQA* ([https://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf)).
- Requiring installation of electric vehicle (EV) charging infrastructure and capacity to meet power requirements of future EV charging needs, per CalGreen Tier 2 charging infrastructure requirements (<https://www.dgs.ca.gov/BSC/CALGreen#codes>).

- Planning for and providing funding for zero-emission transportation projects, including a neighborhood electric vehicle program, community shuttle/van services and car sharing, and enhancement of active transportation initiatives, among others.

We encourage the City to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Amy Dao, Sr. Environmental Planner, at [adao@baaqmd.gov](mailto:adao@baaqmd.gov).

Sincerely,



Greg Nudd  
Deputy Air Pollution Control Officer

Cc: BAAQMD Director David J. Canepa  
BAAQMD Director Carole Groom  
BAAQMD Secretary Davina Hurt