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October 26, 2010

Martha Aja
City Manager's Office
100 Civic Plaza
Dublin, CA 94568

Subject: Draft Dublin Climate Action Plan

Dear Martha Aja:

Bay Area Air Quality Management District (District) staff submitted a comment letter (dated August 5, 2010) on the City of Dublin's Draft Climate Action Plan (CAP) and Draft Negative Declaration. In the letter, the District identified a number of instances in which it appeared that the CAP was inconsistent with the District's 2010 CEQA Guidelines. Subsequently, District staff has met with City of Dublin staff and gained a better understanding of the City's work in developing the CAP, and of the methods used in calculating greenhouse gas (GHG) emissions.

A discussion of significant clarifications gained through communications with City staff follows.

Baseline GHG Emissions Inventory

The District's earlier comment letter identified several emission sources that appeared to have been excluded from the baseline GHG inventory. City staff have clarified that GHG emissions associated with industrial activities, direct access energy use, and electricity use associated with water conveyance were embedded in data for other sectors in the baseline inventory. A subsequent version of the CAP (October 2010) identifies and discusses emissions from these sources.

Reduction Target

The July version of the CAP included a goal of reducing GHG emissions 25% below 2020 business-as-usual levels. As this methodology and target was inconsistent with the District's CEQA Guidelines, City staff has decided to use the District's plan level threshold of 6.6 metric tons per service population. District staff agrees this is a more appropriate target.

GHG Emissions Forecast

The District's earlier comment letter stated that it was unclear if the City was including in its CAP GHG reductions from policies or actions that had taken place

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prior to the base year (2005). If so, these emission reductions would be considered part of the business-as-usual forecast and should not be identified as emission reduction measures. City staff has decided to use the District's recommended plan level threshold of 6.6 metric tons per service population so this is no longer an issue. In addition, the City has added language to the October version of the CAP clarifying that any policies adopted prior to the base year were only included as emission reduction measures if the effect of those policies occurred after 2005. The District also recommends that the GHG emissions associated with the City's Downtown Specific Plan (the draft EIR is currently under public review) be added to the City's GHG emission inventory. Dublin staff indicated that these GHG emissions were omitted from the emission inventory in the CAP. Inclusion of emissions and emission reduction strategies associated with this important downtown planning effort would help assure that that the CAP is as comprehensive as possible.

GHG Reduction Measures

The District's earlier comment letter stated, "A fundamental purpose of a Qualified GHG Reduction Plan is to evaluate and provide a range of possibilities and outcomes which would allow future projects to select mitigation measures that are most applicable and effective, sparing future projects from performing redundant analysis. The City may have unintentionally excluded feasible and effective reduction measures applicable to communitywide emission sources other than those listed in the CAP's Appendix D."

City staff has explained that only existing policies and programs have been included in the draft CAP. While it appears that the City may be able to meet the District's plan-level threshold of significance (6.6 tons per service population) with just these existing measures, it is not clear that this is the case when the emissions from the Downtown Specific Plan are accounted for in the City's GHG emissions inventory. If inclusion of these emissions might exceed the plan-level threshold for the CAP, the City may need to include additional policies and programs at the City's disposal that have not been included in the draft CAP. For example, additional measures could include, but are not limited to the following.

- Expand the City's green building ordinance to apply to all new residential and commercial development projects and redevelopment/remodels, rather than just new residential developments over 20 units;
- Establish a citywide pricing program for public parking;
- Unbundle parking space costs from property lease or rental prices;
- Reduce parking requirements in new developments;
- Require preferential parking spaces for ridesharing and low emission vehicles in all new office and commercial construction projects;
- Implement a transportation demand management program such as requiring large employers to offer workers transit subsidies, parking cash-out, guaranteed rides home, telecommuting options, etc.;
- Implement a citywide car share program;
- Expand the Bay Friendly Landscaping program to commercial developments;
- Adopt a water conservation ordinance for new residential and commercial developments and redevelopments/remodels.

The District commends the City for undertaking the CAP process. The District appreciates the flexibility and openness with which City staff has addressed the issues raised in our earlier comment letter. The City has clearly made a significant commitment to climate protection, through the draft Climate Action Plan and the many climate-friendly policies and programs it has implemented to date. The District looks forward to working with the City of Dublin as it moves forward with implementing the Climate Action Plan and other climate protection strategies. District staff is available to assist the City staff in addressing these comments and otherwise assist with developing and implementing the CAP. If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Roggenkamp", with a stylized flourish at the end.

Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Vice-Chairperson Tom Bates
BAAQMD Director Scott Haggerty
BAAQMD Director Jennifer Hosterman
BAAQMD Director Nate Miley

