



DATE: September 9, 2013

AGENDA ITEM # 2

TO: Environmental Commission
FROM: Zachary Dahl, Senior Planner
SUBJECT: Draft Climate Action Plan

RECOMMENDATION:

Recommend approval of the Draft Climate Action Plan to the City Council

BACKGROUND

State Assembly Bill 32 (AB 32), the Global Warming Solutions Act, was signed into law in 2006 and directed public agencies in California to support the statewide target of reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. One means to support AB 32 is through the preparation of a climate action plan (CAP), which provides a policy framework for how a jurisdiction can reduce GHG emissions. Compliance with AB 32 is not a mandatory requirement for public agencies, but it can qualify a jurisdiction for incentives such as additional grant funding and streamlined environmental review for new projects. Many communities on the Peninsula and in the greater Bay Area have adopted, or are in the process of adopting, climate action plans or GHG reduction strategies.

Over the past 18 months, staff has been working with Pacific Municipal Consultants (PMC), the City's CAP consultant, to prepare a qualified GHG reduction strategy (CAP) for the City. This includes preparation of an inventory of the City's existing GHG emissions for municipal operations and community-wide, a calculation of the City's anticipated emissions into the future, a summary of recent State legislative actions and how they will reduce City emissions, and an overview of the City's existing accomplishments (i.e., the Green Building Ordinance, the Solid Waste Hauling Franchise Agreement, adoption of the Bicycle Master Plan) and how they will contribute to reducing future City emissions.

Using this information, options for setting a GHG reduction target for the City and a suite of reduction measures, policies and programs were drafted by staff and PMC. This information was presented to the Environmental Commission at public meetings on February 11, 2013 and March 11, 2013. At the March meeting, the Commission voted unanimously to recommend that the City Council consider adopting a GHG reduction target of 18 percent.

On April 23, 2013, the City Council held a public meeting to discuss setting a GHG reduction target and to provide input on the suite of reduction measures that should be used to achieve that reduction target. Following public comments and discussion, the Council voted unanimously to set a

minimum reduction target of 15 percent and to direct staff to evaluate additional measures and to report on costs and feasibility of achieving a higher reduction rate.

Based on the input received from the City Council, staff and PMC prepared a draft CAP (Attachment A) that was released for public review on July 9, 2013. It includes a range of incentives, education, and regulations within five focus areas – Transportation, Energy, Resource Conservation, Green Community and Municipal Operations – to achieve GHG emission reductions within the City of Los Altos. The Plan's reduction measures will be applicable to both new and existing development. Full implementation of the reduction measures contained in the CAP can reduce the community's 2020 emissions by up to 15,640 metric tons of carbon dioxide equivalents (MTCO_{2e}), which means the City could achieve a 17 percent reduction in greenhouse gas emissions by 2020.

Public outreach for the publication of the draft CAP included a display ad in the Town Crier on July 24, 2013, email notification to all City commissioners and local organizations (Chamber of Commerce, Los Altos Village Association, GreenTown Los Altos, Los Altos Neighborhood Network, etc.), posting of the draft CAP on the City's website and hardcopies available at City hall and the Public Library. A public meeting before the Environmental Commission was held on August 12, 2013 to provide an opportunity for the public to get additional information and for the Commission to ask questions and discuss the draft CAP. The 45-day public review period ended on Friday, August 23, 2013. A total of 10 public comment letters were submitted – these letters are included in Attachment B.

DISCUSSION

Public Comments

The written public comments that were submitted included a wide range of questions and comments that the Commission should consider when making a recommendation to the City Council. While staff reviewed all of the letters, and is recommending some revisions as a result, this memo will not provide a response to each comment. There were two overarching questions related to double counting emission reductions and future construction that were raised in multiple letters and they are addressed in more detail below.

In order to improve the effectiveness of the CAP during implementation and to make sure that the plan stays current, staff is recommending the following revisions to Implementation Program 2 (page 45):

- A. Prepare an updated emissions inventory no later than 2015 for the most current year that comprehensive information is available.
- B. Update the CAP no later than 2020 to incorporate new technology, programs and policies that reduce emissions and consider a reduction target for future horizons consistent with State legislation.

Staff will also include additional information pertaining to how the community and municipal emission inventories were calculated in Appendix A. This information has already been provided to the Commission, but was summarized in the draft CAP in order to reduce the number of pages in the document.

Calculating Transportation Emission Reductions

In response to questions raised about potential double counting of transportation related emission reductions, PMC provided the following clarification for how emission reductions were calculated for each action:

Active transportation (pedestrian and cyclist) vehicle miles traveled (VMT) and GHG reductions are estimated using multiple complementary methods, including methods recommended by the California Air Pollution Control Officers Association (CAPCOA) 2010 publication *Quantifying Greenhouse Gas Mitigation Measures*.

For cycling, as noted in CAPCOA LUT-8 “As a rule of thumb, the *Center for Clean Air Policy Guidebook* attributes a 1% to 5% [VMT] reduction associated with comprehensive bicycle programs.” Considering Los Altos’ geographic constraints, the reduction should be in the 3%-4% range. To be conservative, a 3% reduction was used, and checked against similar calculations based on commute data (excluding school and “other” trips) from the *Los Altos Bicycle Transportation Plan (BTP)*. The result is a VMT reduction within the margin of error for an estimate of this type.

Reductions for the safe routes to school action account for the increase in previously excluded bicycle school trips. The reduction associated with the car free days is very small (-10 MTCO₂e) and accounts for VMT reductions on specific days, though additional reductions could also occur through related education and outreach.

The reduction for the bike share program is also very small (-30 MTCO₂e) and focuses on lowering the barrier of entry for bicycle access, which is not quantified in the BTP reductions.

The Pedestrian Master Plan (PMP) reduction is quantified using a CAPCOA-recommended 1% VMT reduction for pedestrian network improvements. Although in some cases these improvements will benefit bicycling and pedestrian access, the reductions identified by CAPCOA are distinct and do not double count the BTP reductions.

It is possible that some double counting with the bicycle and pedestrian actions occurs in the traffic calming and complete streets actions; however, this is considered acceptable for the following reasons:

- The 3% reduction used in the BTP quantification captures only commute and school trips. It is likely that additional VMT will be eliminated within other trip types.
- The BTP calculation considers completion of the bicycle network as envisioned in the plan. Traffic calming and complete streets policies supplement and support what is already envisioned in the plan. Therefore, additional VMT reductions are possible.
- Similarly, the PMP calculation considers pedestrian network improvements in the plan. Pedestrian benefits of traffic calming and complete streets policies would be in addition to those network improvements.
- Complete streets policies also enable better transit access, which supports additional VMT reductions.

Projecting Future Construction Activity

In response to questions raised about why the city would see a reduction in future construction (off-road) related emissions, PMC provided the following response:

Table 5 (page 13 of the draft CAP) uses growth indicators to forecast future emissions. Anticipated building permit data for 2020 and 2035 is estimated based on annual average housing unit projections that are provided by the Association of Bay Area Governments (ABAG). The lower annual building permit estimate indicates that Los Altos is a community that is nearing full build-out and will likely have a lower rate of new housing units constructed through 2020 and 2035. However, this estimate does account for a greater number of renovations and rebuilds, which require less construction equipment. The lower annual building permit estimate correlates with the decrease in off-road emissions. However, a slight difference in the rate of the decrease exists because the off-road sector also includes lawn and garden equipment emissions estimates.

Next Steps

As a policy advisory body to the City Council, the Environmental Commission should provide a recommendation on the draft CAP. Based on the input from the Commission during the development of the CAP and public comments, staff recommends that the Commission recommend adoption of the draft CAP as amended.

The City Council is scheduled to hold a public meeting to consider the draft CAP, public comments and the Environmental Commission's recommendation on September 24, 2013. Once the Council takes action on the draft CAP, staff will prepare a Negative Declaration per the California Environmental Quality Act (CEQA) to meet environmental review requirements. Following completion of the CEQA review process, the CAP will be brought back to Council for final consideration and adoption.

Attachments:

- A. Draft Climate Action Plan
- B. Public Comments