



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

January 6, 2012

Hillary Gitelman
Director of Conservation, Development & Planning
1195 Third Street, Suite 210
Napa, CA 94559

Subject: Draft Climate Action Plan

Dear Ms. Gitelman:

Bay Area Air Quality Management District (District) staff reviewed the Draft Napa County (County) Climate Action Plan (Plan). We understand that the County's intent in developing this Plan is to meet commitments in the General Plan to develop a greenhouse gas (GHG) inventory and climate action plan for the County's unincorporated areas. The County's climate protection goal is to reduce community-wide GHG emissions 15% below 2005 levels by 2020.

The District supports the County's efforts in developing the Plan. The District's intent in creating the Qualified GHG Reduction Strategy as an operational threshold of significance in its CEQA Guidelines is to ensure that communities will develop in such a manner as to enable the State to meet its GHG reduction goals under AB 32 and Executive Order S-3-05.

The District believes that this Plan meets the minimum standard elements of a Qualified GHG Reduction Strategy as defined by the District's CEQA Guidelines. The District has the following specific comments on the Plan to further strengthen the County's ability to meet its climate protection goals.

In aggregate, the GHG reduction measures add up to the Plan's emission reduction target. However, the District recommends that additional measures be added to the Plan to ensure that the County meets its GHG reduction target in the event that proposed measures fall short of their goals, or the State fails in its efforts to fully implement the Scoping Plan policies that the County has included in the Plan. Specifically, the District recommends that the County expand some of the measures currently in the Plan:

- EE-1: expand the Green Building Ordinance to apply to existing buildings (remodels), and to exceed Title 24 by a minimum of 15%;
- W-1: expand the Comprehensive Water Efficiency Ordinance to apply to new construction and commercial buildings;
- W-2: expand the Landscape Ordinance to apply to commercial buildings;
- T-10: make the Employer-based Commute Trip Reduction Program mandatory for large employers (50+ employees) and include strategies such as parking cash-out and commuter benefits programs.

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The District also recommends that additional mandatory measures be included in the Plan in order to strengthen the Plan's ability to meet longer term GHG reduction goals such as those included in Executive Order S-3-05. The District recommends mandatory measures that are found in many other climate action plans, such as:

- A time-of-sale (RECO/CECO) energy efficiency requirement that exceeds Title 24 for existing development;
- Cool roofing and cool paving requirements for new development and remodels;
- Pricing for on-street parking; and
- Unbundled parking costs from residential and commercial rents.

The GHG reduction strategy in the Plan allows for GHG emission offsets from vineyard and development projects. The District strongly advises that as these offset programs are developed, robust verification and reporting systems be put in place to authenticate actual GHG reductions from the offset investments. In addition, the District recommends that investments be made with a high priority for offsets occurring within Napa County.

The County has included text in the Plan stating that, *"If GHG emissions are not trending toward achieving the 2020 reduction target, the County will amend this Plan, as necessary to more effectively promote GHG reductions."* The District acknowledges this important emphasis on monitoring the implementation of the GHG mitigation measures in the Plan. Ongoing monitoring is critical in order to demonstrate that the Plan is achieving its goals, thereby maintaining its status as a Qualified GHG Reduction Strategy over time.

The District appreciates the early and regular communication that City staff and their consultants have provided to the District during the development of the Plan. Local climate action planning focused on GHG reduction targets like Napa County's help the Bay Area move toward reaching the State's AB 32 and Executive Order goals, and also serve as a model from which other communities can learn. District staff looks forward to working with Napa County as you move forward with your climate protection efforts.

If you have any questions, please do not hesitate to contact Abby Young, Principal Environmental Planner, at (415) 749-4754.

Sincerely,



Jean Roggenkamp
Deputy Air Pollution Control Officer

cc: BAAQMD Director Brad Wagenknecht