

TO: James L. App, City Manager
FROM: Ed Gallagher, Community Development Director
SUBJECT: Draft Climate Action Plan - Addendum
DATE: November 19, 2013

NEEDS: For the City Council to consider the recommendations and discussion of the Planning Commission on the draft Climate Action Plan.

FACTS:

1. The Planning Commission considered the draft Climate Action Plan (CAP) at their meeting on November 12, 2012 and on a 4-2 vote recommended approval of the Draft CAP as a "Qualified" CAP, with no changes suggested, to the City Council.
2. Staff presented information on the process of developing the plan and contents of the CAP. Staff also made note of environmental streamlining benefits that could be experienced by development projects that are determined to be consistent with a "qualified" CAP.
3. The Commission received very little public input at the meeting on this project. Two speakers made comments. There were no speakers in opposition to the project.
4. Six Commission members were in attendance at the hearing on the CAP (Commissioner Barth was absent). Four of the Commissioners voted in favor of the plan, with two members opposed (Commissioners Gregory and Holstine).
5. Commissioners Holstine and Gregory disagreed with the recommendation to adopt a "Qualified" Plan as they expressed that doing so could make the CAP measures mandatory in the future.

ANALYSIS &

CONCLUSION: The toolbox measures, which were previously discussed at length by the Planning Commission and City Council, were integrated into the plan as the Action Measures. There was brief discussion regarding options for the City to implement the plan, tracking, monitoring, and so forth.

The City's draft CAP complies with all of the criteria required for it to be adopted as a "qualified" CAP. Criteria for qualified CAPs is provided in Attachment 3 of the Council's staff report. The APCD staff said there is no legislative relationship that connects adopting a CAP as a "qualified" plan and the potential for measures to all become mandatory in the future, even if the City did not meet the adopted reduction goals.

An example of how a project can streamline the CEQA review process and mitigation for projects is provided in an excerpt from a GHG Analysis for a project that the City is currently processing. (See Attachment 1.) The excerpt includes recommended mitigation measures to reduce GHG from the project. Mitigation measure MM GHG-1 (a) provides a list of typical GHG reduction measures. MM GHG-1 (b) and the paragraph after MM GHG-1 (c), describes that, if the project and the mitigation measures recommended are consistent with a qualified CAP, then no further mitigation is necessary because it would be determined that the project has sufficiently mitigated impacts (through project design) and would result in "less-than-significant" impacts. If however, the City does not have an adopted qualified CAP, then the project would be subject to further mitigation to reduce impacts below the APCDs adopted GHG threshold of 1,150 MTCO₂e/year. Given the magnitude of the proposed project and resulting emissions (5,234.8 MTCO₂e/year), the applicant would likely be required to do off-site mitigation or pay off-site mitigation fees.

Again, the draft CAP meets the criteria for it being a qualified plan, and there are clear benefits to large-scale development if it is adopted as a Qualified Climate Action Plan.

Attachment

1. Excerpt from a development project Greenhouse Gas Impact Study

Table 4
Operational Greenhouse Gas Emissions Without Mitigation
Year 2020 – Phase II

Source	Net Change in Emissions (MTCO ₂ e/Year)
Area Source	0.01
Energy Use	2,131.97
Motor Vehicles	2,045.67
Offroad	4.50
Waste Generation	69.92
Water Use and Conveyance	46.34
Construction (Amortized)	85.7
Total:	4,312.51

*Based on initial operational year 2016 conditions.
Refer to **Appendix B** for modeling assumptions and results.*

Table 5
Long-Term Greenhouse Gas Emissions Without Mitigation
Year 2020 – Phases I & II

Source	Net Change in Emissions (MTCO ₂ e/Year)
Phase I Operational	1,091.2
Phase I Construction (Amortized)	14.1
Phase I Carbon Sequestration (Amortized)	-18.6
Phase II Operational	4,298.1
Phase II Construction (Amortized)	85.7
Total:	5,470.8
SLOAPCD Significance Threshold:	1,150
Exceeds Significance Threshold?	Yes

*Assumes operational year 2020 conditions. Phase I emissions are presented in a separate report (Ambient 2013). Phase II emissions may vary depending on initial operational year and GHG-reduction measures implemented.
Refer to **Appendix A** for modeling assumptions and results.*

Mitigation Measure

MM GHG-1:

- a. The following measures shall be implemented for Phase II:
 - Use low-VOC paints (50 grams/liter, or less) and low-VOC cleaning supplies.
 - Project-wide lighting efficiency improved by at least 16% relative to current conventional lighting methods through the installation of energy-efficient lighting, (e.g., metal halide, high-pressure sodium, LEDs) for interior and exterior lighting areas.
 - Utilize low-flow faucets and toilets and water-efficient irrigation systems to reduce energy demands associated with water use.
 - Proposed onsite occupied buildings shall exceed baseline Title 24 Building Envelope Energy Efficiency Standards by a minimum of 10 percent. The

baseline GHG emissions from electricity and natural gas usage shall reflect 2008 Title 24 standards with no energy-efficient appliances.

- Install high efficiency heating and cooling systems and appliances (i.e., Energy Star rated).
- Provide shade tree planting in parking lots to reduce evaporative emissions from parked vehicles. Design should provide minimum 50% tree coverage within 10 years of construction using low-ROG emitting, low maintenance native drought resistant trees.
- Provide outdoor electrical outlets to encourage the use of electric appliances, tools, and landscape maintenance equipment.
- Pave and maintain roads and parking areas.
- Utilize green building materials (materials which are resource efficient, recycled, and sustainable) available locally if possible.

- b. The proposed project shall demonstrate consistency with a Qualified Greenhouse Gas Reduction Strategy specifically applicable to the project, as identified in an applicable Climate Action Plan and in accordance with SLOAPCD-recommended guidance. A consistency analysis shall be prepared for submittal to the Community Development Department. The consistency analysis shall identify the GHG-reduction measures to be implemented, including but not limited to those identified in MM GHG-1,a above, sufficient to achieve consistency with the adopted Climate Action Plan; **or**,
- c. The proposed project shall incorporate onsite and/or offsite GHG-reduction measures, including but not limited to those identified in MM GHG-1,a above, sufficient to reduce combined Phase I and Phase II project-generated emissions below 1,150 MTCO₂e/year. Offsite mitigation may include the payment of offsite mitigation fees to the SLOAPCD, to be quantified in accordance with SLOAPCD-recommended guidance. The schedule for payment of offsite mitigation fees, if required, shall be in accordance with a time schedule deemed appropriate by Community Development Department staff and in coordination with the SLOAPCD.

The above mitigation measure includes two options for mitigating project-generated GHG emissions: either by demonstrating consistency with a Qualified Greenhouse Gas Reduction Strategy, or by reducing and/or offsetting project-generated emissions below 1,150 MTCO₂e/year. It is important to note, however, that the City of Paso Robles has not yet adopted a Climate Action Plan. Although not yet adopted, the City of Paso Robles' Climate Action Plan is anticipated to be completed in 2014 and adopted prior to implementation of Phase II of the proposed project. In accordance with SLOAPCD-recommended thresholds of significance, projects determined to be consistent with a Qualified Greenhouse Gas Reduction Strategy, or equitably similar adopted policies, ordinances and programs, would be considered to have a less-than-significant impact.

The second option would require implementation GHG-reduction measures and/or payment of an offsite mitigation fee sufficient to reduce total project-generated emissions from all project phases below 1,150 MTCO₂e/year. Based on the modeling conducted, total year 2020 project-generated emissions for Phase II (excluding Phase I) would total approximately 4,097 MTCO₂e/year (**Table 6**). With the inclusion of Phase I emissions, as identified in **Table 7**, the combined total project-generated GHG emissions for year 2020 conditions would increase to approximately 5,234.8 MTCO₂e/year. It is important to note that Phase II operational emissions may change as more detailed project-specific information becomes available. However, with