

**TO:** Planning Commission  
**FROM:** Ed Gallagher, Community Development Director  
**SUBJECT:** Greenhouse Gas Reduction Plan “Toolbox”  
**DATE:** May 14, 2013

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**NEEDS:** For the Planning Commission to complete their review of the proposed Greenhouse Gas (GHG) Reduction Plan “Toolbox” measures, and to make a recommendation to the City Council on measures to include in the Plan.

- FACTS:**
1. The Planning Commission held a meeting on the GHG Toolbox on April 23, 2013.
  2. The Commission considered seven of the 36 measures in the Toolbox. Review of the remaining measures was continued until their next meeting on May 14, 2013.
  3. The Commission received public testimony on the project and specific Toolbox measures on April 23, 2013. The Commission indicated they would accept further public input at the next meeting.

**ANALYSIS &  
CONCLUSION:**

The Commission and public provided significant input at the meeting on April 23, 2013. One of the Commission’s specific requests is to have staff research the potential to use a different base year for the GHG Inventory. The base year used in the City’s GHG Inventory is 2005. The intent of using a different base year is the assumption that using a year that did not experience as much development as in 2005 would yield a lower amount of GHG to be reduced.

The base year of 2005 was used since it is the earliest year the City has accurate data needed to complete the GHG inventory. This year has also been widely used since the Air Resources Board has pre-determined that agencies that reduce their GHG emissions by 15 percent from amounts produced in 2005 would be in compliance with the reductions required by AB 32. That said, a different base year is permissible.

Staff contacted the consulting firm of PMC Consultants, the firm that prepared the existing GHG Inventory in 2009. (This inventory was subsequently updated in 2011 to incorporate activities that had occurred to reduce GHG since 2005, and to also capture GHG reductions that will occur as a result of new State clean fuel and vehicle efficiency standards.) Staff discussed issues related to using different base years and technical requirements to change the base year with the consultants. Staff also obtained a cost estimate to redo the GHG Inventory using a different base year.

Issues to consider if the City were to use a later base year include the following:

- The base year is a “snapshot” in time of what was being emitted in a particular year. Using a different year will not materially change the bulk of what needs to be done to reduce GHG. For example, the amount of energy used for buildings and transportation-related emissions (the largest emissions sectors) probably did not change dramatically between 2005 and 2010, despite the fact that there were more buildings in 2010 than there were in 2005. However, the operation of construction-related equipment and amounts of solid waste were generally reduced. Since emissions mostly result from other sectors, primarily transportation, the significance in the change of emissions from construction between different years is likely negligible.
- Consistent with the City’s planned growth in the General Plan, the City anticipates continued development over the next several years. The GHG inventory model includes a projection of future growth and development based on the General Plan. If a depressed base year were used, it may skew the data “snapshot” and result in a determination that more emissions need to be reduced in a shorter period of time. Even if it doesn’t skew the data, the City would still have less time to meet the end goals if a later year were used.
- There may be unintended consequences of delaying preparation of the Plan, which would likely take upwards of 6 months or more to do. SB 97 requires analysis under the California Environmental Quality Act (CEQA) of GHG impacts in environmental documents. Thus, if the City’s specific plans or any other major development project progress faster than it takes to complete the new inventory and adopt a GHG Reduction Plan, they could potentially be delayed or risk exposure to legal challenges on the adequacy of their CEQA documents. The City may also expose itself to legal challenges by what could be seen as unnecessary delay on adopting a GHG Plan.
- The adopted methodologies and modeling protocol used in 2005 changed between then and 2010. The GHG model now uses a different software program and the ability to get quality data has improved. Therefore a straight comparison from what was prepared with the prior protocol and a new inventory using current protocols would result in irregularities. Therefore, the 2005 Inventory would need to be redone for the year 2005 using the same modeling procedures to ensure an “apples-to-apples” analysis. This would add to the cost of preparing a new inventory.
- The consultants estimated the cost to redo the GHG Inventory to be approximately \$20,000. The costs of preparing the 2005 GHG Inventory was grant-funded. The City Council has not budgeted for this extra cost, nor has the City budgeted for the additional staff resources necessary to do this extra work.

If the GHG Inventory were redone using a different base year, the amount of emissions generated in the base year and the amount of reductions necessary may be slightly reduced. The Planning Commission may include in their recommendation to

the City Council on the Toolbox that the City Council also consider redoing the GHG Inventory using a different base year, and accept the associated risks and costs.

**POLICY**

**REFERENCE:** Assembly Bill 32, California Environmental Quality Act, 2003 General Plan

**FISCAL**

**IMPACT:** Costs to the City to implement the GHG Reduction Plan would be absorbed through existing City resources and through grants and/or augmented through contract employees paid for as “pass-through” expenses. Costs associated with redoing the GHG Inventory (estimated to be \$20,000) would be a General Fund expense.

**OPTIONS:** After opening the public hearing and taking public testimony, the Planning Commission is requested to take one of the actions listed below:

- (1) Recommend that the City Council approve the Toolbox measures identified.
- (2) Amend, modify or reject the foregoing option.