



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

September 22, 2020

Shelly Reider, Environmental Programs Manager
City of Millbrae, Public Works Department
621 Magnolia Avenue
Millbrae, CA 94030

RE: Millbrae 2020 Climate Action Plan and Initial Study-Negative Declaration

Dear Ms. Reider,

Bay Area Air Quality Management District (Air District) staff has reviewed the Millbrae 2020 Climate Action Plan (CAP) and the Draft Initial Study – Negative Declaration (IS-ND) for the 2020 CAP. The City of Millbrae developed the CAP to identify strategies to meet State climate targets by reducing municipal and communitywide greenhouse gas (GHG) emissions. A total of 43 measures related to energy, transportation, waste, and water are identified in the CAP to reach the City’s GHG reduction targets. It is anticipated that the IS-ND would be used to streamline CEQA review for projects consistent with the CAP.

Air District staff commends the City in establishing its first official climate action plan for Millbrae. In particular, we commend the City for the CAP’s commitment to strategies and actions that serve to enhance and leverage State policies and programs. The CAP captures the various sectors in which local action will be critical for reducing GHG emissions to the levels required to achieve GHG targets and describes how the City plans to implement these actions.

The CAP sets a GHG reduction target of 49% below the baseline 2005 emission levels by 2030, which it expresses as consistent with California’s target of reducing GHG emissions 40% below 1990 levels by 2030, codified in SB 32. Staff recommends that the CAP explain quantitatively how these two different targets are consistent in terms of absolute emission reductions by 2030. The CAP states that the City will “meet or exceed” the statewide goal of carbon neutrality by 2045 but does not demonstrate how the CAP’s measures would contribute to achieving this target. Staff recommends that the CAP include an evaluation of how the current slate of measures contributes to meeting the 2045 target, and what additional strategies the City might consider to further advance along a path to carbon neutrality by 2045. Staff appreciates the inclusion in the CAP of the City’s commitment that, as implementation of the CAP progresses, regular assessments will be performed to determine progress toward the 2030 and 2045 targets, enabling adjustments to be made, including the adoption of additional mandatory measures.

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The CAP includes a number of strong measures addressing GHG emissions from buildings, transportation, and other sectors, including several mandatory approaches including requirements for solar on new residential construction exceeding Title 24 requirements, and time of sale energy upgrade ordinances for residential and commercial buildings. However, the Plan does not include any quantitative justification for the GHG emission reduction estimates associated with the measures. Without this justification, it is impossible to judge whether the measures included in the CAP will achieve the CAP's targets or not, thus weakening the CAP's ability to support tiering under CEQA. Staff recommends that the Final Plan include quantification for each GHG reduction measure, justifying the emission reduction estimates included in the Plan.

The monitoring strategy includes updating GHG inventories minimally every five years and annual assessments of measures with the goal of adjusting mid-stream as necessary in order to meet the 2030 target. The CAP indicates that a timeline for implementation will be developed after adoption. Staff recommends that the Final CAP contain a timeline for implementation, and that the City update GHG inventories minimally every three years. Staff recommends that the City identify a staff position that is entrusted with the coordination and implementation of the CAP. Experience has shown that jurisdictions that have dedicated staff to implementing their climate action plans have greater success in progressing toward their GHG reduction targets. Staff also recommends that the CAP include a checklist for new projects to demonstrate consistency with the Plan.

Air District staff commends the City for addressing the critical issue of climate change through local action and for the achievements the City has already made in addressing climate change. By addressing the issues and suggestions in this letter, Air District staff believes that the City's CAP would be more likely to achieve its GHG reduction target, thereby better positioned to support streamlining for future projects under CEQA.

Air District staff is available to assist the City in addressing these comments. If you have any questions or would like to discuss Air District recommendations further, please contact Josephine Fong, Environmental Planner, at (415) 749-8637 or jfong@baaqmd.gov, or Abby Young, Climate Protection Manager, at (415) 749-4754 or ayoung@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director David J. Canepa
BAAQMD Director Carole Groom
BAAQMD Director Davina Hurt