

Appendix A – Greenhouse Gas Emissions Reduction Strategy

Purpose and Intent of the GHG Strategy

As part of the 2035 General Plan Update, a greenhouse gas (GHG) emissions reduction strategy (GHG Strategy) was prepared and integrated with the General Plan and Program EIR. The purpose of the GHG Strategy is to identify and reduce current and future community GHG emissions and those associated with the City's municipal operations. The GHG Strategy is consistent with the City's commitment to a sustainable community and green living per the General Plan Vision and Guiding Principles; however, it also serves to identify the City's local fair-share contribution to meeting statewide GHG emission reduction goals pursuant to Senate Bill 32 (2016), which calls for a statewide reduction of GHG emissions to 40 percent below 1990 levels by the year 2030.

The GHG Strategy also satisfies the requirements of the California Environmental Quality Act (CEQA) to identify and mitigate GHG emissions associated with the General Plan Update as part of the environmental review process. At the same time, the GHG Strategy also serves as the City's "plan for the reduction of greenhouse gases", per Section 15183.5 of the CEQA Guidelines, which provides the opportunity for tiering and streamlining of project-level emissions for certain types of discretionary projects subject to CEQA review that are consistent with the General Plan. Thus, the GHG Strategy fulfills a regulatory obligation under CEQA to disclose and mitigate potential impacts and also provides a potential streamlining pathway for future projects.

Additionally, the GHG Strategy was prepared using the best-available guidance at the time the General Plan was prepared, including the latest GHG emissions accounting protocols, the 2017 Climate Change Scoping Plan adopted by the California Air Resources Board (CARB), and both the 2017 General Plan Guidelines and CEQA Guidelines published by the Governor's Office of Planning and Research (OPR). The subject of climate change and GHG emissions mitigation continues to evolve rapidly in terms of both policy and technical methodology; thus, the City will need to monitor and adjust the GHG Strategy, as outlined further below.

How the GHG Strategy Works

The GHG Strategy is intended to function like a stand-alone emissions reduction plan or “climate action plan” (CAP). However, rather than having a separate stand-alone plan, the GHG Strategy includes all the necessary components of a CAP and integrates them into the policy framework of the General Plan or technical analyses included within the EIR and its technical appendices. All policies and programs that relate to one or more components of the GHG Strategy are tagged with a globe symbol (🌐) in the General Plan. Table A-1 below summarizes the core components of the GHG Strategy, their locations in the General Plan and EIR, and relationship to the specific criteria outlined for a qualified “plan for the reduction of greenhouse gases” per Section 15183.5 of the CEQA Guidelines.

Table A-1: GHG Strategy – Summary of Components and Locations in General Plan and EIR

GHG Strategy Component	Policy Document Location(s)	General Plan EIR Location(s)	Corresponding Criteria for a “Plan for the Reduction of Greenhouse Gases” per CEQA Guidelines Section 15183.5(b)(1)
GHG Emissions Inventory and Forecasts	-	Baseline emissions inventories were prepared for 2014 and forecasts were also prepared per the General Plan growth projections to 2020, 2030, and 2050. These are summarized in the GHG Section of the EIR. Detailed emissions inventory and forecast data are documented in EIR Appendix H (Global Climate Change Technical Appendix).	“A. Quantifies GHG emissions, existing and projected over a specified time period, resulting from activities within a defined geographic area” “C. Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated in the defined geographic area”
GHG Emissions Reduction Targets/Goals	Policies NCR 3.2.1 and 3.2.2 identify the City’s specific GHG emissions reduction goals and targets, consistent with State guidance and legislation.	GHG reduction targets and goals are summarized in the GHG Section of the EIR. Detailed technical analysis and modeling results regarding how the targets and goals were calculated are in EIR Appendix H (Global Climate Change Technical Appendix)	“B. Establish a level of GHG emissions, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable”
GHG Emissions Reduction Measures	Specific policies and implementations included throughout the Policy Document that are aligned with one or more specific GHG reduction measures that constitute the GHG reduction strategy. Many of those tagged with a globe symbol are GHG reduction measures.	The GHG Section of the EIR summarizes the results of the GHG emissions reduction analysis and performance of the General Plan policies and programs in achieving the GHG reduction targets and goals. Detailed technical analysis and modeling results regarding the GHG measures, including those that are quantitative as well as qualitative measures, are included in EIR Appendix H (Global Climate Change Technical Appendix)	“D. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates if implemented on a project-by-project basis, would collectively achieve the specified emissions level”

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GHG Strategy Implementation and Monitoring Procedures	<p>Policy NCR 3.2.8 describes criteria and implementation guidance for streamlining GHG analyses for projects consistent with the General Plan.</p> <p>Specific GHG Strategy monitoring programs and policies include: Policy NCR 3.2.4 (Additional GHG Emissions Programs), Policy NCR 3.2.5 (Climate Change Assessment and Monitoring), and Implementation Program NCR-2 (Maintain GHG Emissions Inventory)</p> <p>Additionally, as outlined in the Implementation chapter of the Policy Document, the City will monitor, maintain and report on progress of all policies and programs included in the General Plan, inclusive of policies and programs included in the GHG Strategy.</p>	-	<p>“E. Establishes a mechanism to monitor the plan's progress towards achieving the level and to require amendment if the plan is not achieving specified levels.”</p>
Environmental Review of the GHG Strategy	-	<p>The Program EIR prepared for the 2035 General Plan (including GHG Section of EIR and EIR Appendix H) contains the environmental analysis of the proposed 2035 General Plan. The GHG Strategy is incorporated into the General Plan and analyzed in the EIR.</p>	<p>F. Be adopted in a public process following environmental review</p>

As summarized in Table A-2 below, specific GHG reduction measures were identified and incorporated into the 2035 General Plan. The GHG reduction measures vary considerably in the method, timing, and approach to implementation; depending on the nature of the GHG reduction measure, the sector, or specific sources of emissions addressed by the GHG measure. The GHG Strategy identifies existing and projected future GHG emissions for the city, both now and into the future; thus, the GHG emissions reductions and associated targets apply to existing development, new development, or both; and, in some cases, specifically only to the City's municipal operations. Some GHG reduction measures are programmatic in nature and require further study or subsequent action to fund, develop, and implement a new program, form a new partnership, or engage with or support the efforts of other agencies or organizations. Other GHG measures are regulatory in nature and require the City to amend codes, standards, or specifications and will be implemented through the development review and permitting process. More detailed assumptions regarding applicability and method of implementation are documented in Appendix H to the EIR.

CEQA PROJECT-LEVEL TIERING AND STREAMLINING USING THE GHG STRATEGY

As stated in Policy NCR 3.2.8 (Streamlined GHG Analysis for Projects Consistent with the General Plan):

“Projects subject to environmental review under CEQA may be eligible for tiering and streamlining the analysis of GHG emissions, provided they are consistent with the GHG reduction measures included in the GHG Strategy contained in the General Plan and EIR. The City may review such projects to determine whether the following criteria are met:

- *Proposed project is consistent with the current general plan land use designation for the project site;*
- *Proposed project incorporates all applicable GHG reduction measures (as documented in the Climate Change Technical Appendix to the General Plan EIR) as mitigation measures in the CEQA document prepared for the project; and,*
- *Proposed project clearly demonstrates the method, timing and process for which the project will comply with applicable GHG reduction measures and/or conditions of approval, (e.g., using a CAP/GHG reduction measures consistency checklist, mitigation monitoring and reporting plan, or other mechanism for monitoring and enforcement as appropriate).”*

Pursuant to Policy NCR 3.2.8, the City may develop more specific tiering and streamlining procedures such as a GHG consistency checklist and more detailed guidance for determining consistency with applicable policies and programs in the GHG Strategy. While Table A-2 generally summarizes which types of measures are applicable in different contexts, the City will ultimately make the determination of applicability of any specific policy or program identified with respect to future projects seeking consistency with the General Plan.

Finally, per Section 15183.5 of the CEQA Guidelines, the City and project applicants may use the GHG Strategy for tiering and streamlining GHG analyses for certain future projects determined to be consistent with the General Plan; however, specific details of all future discretionary actions or proposed projects that may occur through 2035 are not currently known. Thus, it cannot be stated with certainty whether all projects subject to environmental review under CEQA will be eligible for use of the GHG Strategy for tiering and streamlining purposes. Determining consistency with the GHG Strategy in the General Plan per Section 15183.5 of the CEQA Guidelines will be the City's recommended threshold for many projects involving land development or related entitlements that are determined to be consistent with the General Plan. However, for future discretionary actions involving activities or types of projects that are not covered by the GHG Strategy, or in the event a proposed project is determined to be inconsistent with the General Plan, the tiering and streamlining benefit of the GHG Strategy may not be feasible. Thus, in these circumstances, the City retains its discretion during the development review process to require future projects to conduct project-specific GHG analysis as part of the CEQA review process using project-level GHG thresholds of significance that are based on substantial evidence.

Table A-2: Summary of GHG Reduction Measures and Corresponding General Plan Policies and Programs

General Plan Policies and Programs	Description of GHG Reduction Measure	Applicability of GHG Measure				
		Existing Development Only	New Development Only	Existing and New Development	Municipal Operations	Applies to Projects Seeking CEQA GHG Streamlining
Building Energy Sector						
NCR 3.2.3, LU 9.1.10, LU 1.1.13, LU 1.1.14, Program PFS-25, Program LU-6	E-1: Improve Building Energy Efficiency in New Development		X			X
PFS 8.1.9, Program PFS-23	E-2: Water Heater Replacement in Existing Residential Development	X				
PFS 8.1.5, PFS 8.1.4, Program PFS-24	E-3: Improve Building Energy Efficiency in Existing Development	X				
PFS 8.1.3, Program PFS-24	E-4: Increase Use of Renewable Energy in Existing Development	X				
PFS 8.1.7	E-5: Improve Energy Efficiency in City-Owned Facilities				X	
PFS 8.1.3, Program PFS-22	E-6: Increase use of Renewable Energy in City-Operated Facilities				X	
Transportation Sector						
LU 3.1.1, LU 3.1.5, LU 3.1.6, LU 4.1.2, LU 4.1.3, NCR 3.1.3	T-1: Reduce VMT Through Mixed and High-Density Land Use			X		X



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M 2.1.15, M 1.1.4, M 1.1.6, M 1.1.5, M 2.1.2, M 2.1.3, M 2.1.4, Program M-8	T-2: Improve Streets and Intersections for Multi-Modal Use and Access			X		X
M 1.1.9, NCR 3.1.3, Program M-1	T-3: Adopt Citywide TDM Program			X		
M 1.1.9, NCR 3.1.3, Program M-1	T-4: Adopt TDM Program For City Employees				X	
M 4.2.1, M 4.2.2, M 4.2.3, Program M-11	T-5: Reduce Minimum Parking Standards			X		X
NCR 3.2.7, Program PFS-26	T-6: Require the Use of High-Performance Renewable Diesel in Construction Equipment			X	X	X
PFS 8.1.8, Program PFS-14	T-7: Alternative Fuel in City Fleet				X	
M 1.1.10, M 4.2.4, M 6.1.3, Program M-3, Program M-4	T-8: Install Electric Vehicle Charging Stations			X		X
Solid Waste						
PFS 9.1.3, Program PFS-18, Program PFS-19, Program PFS-20, Program PFS-21	SW-1: Increase Solid Waste Diversion			X		

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		Existing Development Only	New Development Only	Existing and New Development	Municipal Operations	Applies to Projects Seeking CEQA GHG Streamlining
Water and Wastewater						
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-1: Increase Water Efficiency in New Residential Development		X			X
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-2: Reduce Outdoor Water Use			X		X
PFS 3.1.3, PFS 3.1.9, Program PFS-27	W-3: Reduce Potable Water Consumption at City Facilities				X	

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