



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Planning Commission

SUBJECT: SEE BELOW

DATE: November 5, 2020

SUBJECT: PP20-012 AND GPT20-002. A CITY-INITIATED GENERAL PLAN TEXT AMENDMENT FOR UPDATE OF THE GREENHOUSE GAS REDUCTION STRATEGY (APPENDIX 8 OF THE ENVISION SAN JOSÉ 2040 GENERAL PLAN) CONSISTENT WITH STATE SENATE BILL (SB) 32 AND TO REVISE POLICY IP-3.7 AND REMOVE ACTION IP-3.10 OF CHAPTER 7 OF THE ENVISION SAN JOSÉ 2040 GENERAL PLAN.

RECOMMENDATION

The Planning Commission voted 7-0-0 to recommend that the City Council take all of the following actions:

1. Adopt a resolution adopting the Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report (Resolution No. 76041) and Supplemental Environmental Impact Report to the Envision San José General Plan Final Program Environmental Impact Report (Resolution No. 77617), and Addenda thereto in conformance with CEQA; and
2. Adopt a resolution approving amendments to the Envision San José 2040 General Plan: (i) revise Policy IP-3.7 and delete Action IP-3.10 of Chapter 7 removing references to City Council Policy related to Greenhouse Gas Reduction Strategy; and (ii) replace the existing Greenhouse Gas Reduction Strategy in Appendix 8 with the 2030 Greenhouse Gas Reduction Strategy.

OUTCOME

If the City Council approves all the actions listed above, the City will have an adopted greenhouse gas reduction strategy (GHGRS) that demonstrates how the City will meet the interim statewide targets in Senate Bill (SB) 32 for greenhouse gas (GHG) emissions in 2030 and long term goal in 2050 under the Governor's Executive Order EO S-3-05. The adoption of this

strategy will streamline GHG emissions analysis required under the California Environmental Quality Act (CEQA) for future development and plans found to be consistent with the GHGRS.

BACKGROUND

The purpose of the 2030 GHGRS is to serve as a GHG reduction plan to streamline GHG emissions analysis of future development and plans within the City pursuant to CEQA Guidelines Sections 15152, 15183, and 15183.5. The 2030 GHGRS develops an interim 2030 emissions target that is consistent with the State's adopted 2030 GHG target, demonstrates San José's fair share reductions toward statewide target achievement, and demonstrates progress toward meeting the state's 2050 reduction target in EO S-3-05.

The 2030 GHGRS analyzes and compares the City's base year inventories (2008 and 2014) with the 2017 GHG inventory, emissions trends over time, and forecasts in comparison to the identified emissions target. It also identifies policies, plans, and programs that will contribute to GHG reductions in the City and achievement of the City's 2030 target, including actions that implement the City's Envision San José 2040 General Plan. The 2030 GHGRS provides a roadmap by which the City can reduce its GHG emissions to achieve the identified target, by application of a development checklist that identifies clear implementable strategies for GHG reductions that new projects in the City must implement to demonstrate consistency with the 2030 GHGRS.

The City prepared its first Greenhouse Gas Reduction Strategy in combination with the Envision San José 2040 General Plan Update in 2011; it was updated in 2015. Since the GHGRS update in 2015, the State of California (State) has expanded on AB 32 with the establishment of the statewide GHG reduction targets for 2030 of Senate Bill 32; this was followed by an Executive Order (EO B-55-18) defining a carbon neutrality goal for the state to be achieved by 2045.

This GHGRS update (referred to as 2030 GHGRS) builds on the goals of the previous GHGRS and furthers the strategies embedded in other City plans to align with the State's 2030 GHG target (SB 32) and with consideration for the State's long-term emissions goal.

The 2030 GHGRS is developed under General Plan Policy IP-3.7 to monitor and update as necessary the GHG reduction strategy measures and IP-17.2 to develop and maintain a Greenhouse Gas Reduction Strategy to serve as a road map for reducing GHG emissions. The 2030 GHGRS will replace the General Plan's former GHGRS in Appendix 8 of the Envision San José 2040 General Plan, as the former GHGRS only evaluated GHG emissions to 2020.

The proposed 2030 GHGRS provides an update of current emissions levels based on a 2017 emissions inventory (Appendix A to the 2030 GHGRS), establishes a new 2030 emissions target consistent with SB 32, and assesses the City's progress toward its 2030 GHG targets. The 2030 emissions target is an interim target to meet the State's long-term goal of reducing statewide emissions to 80 percent below 1990 levels by 2050 pursuant to Executive Order EO S-3-05.

The 2030 GHGRS is consistent with the major strategies and policies within the Envision San José 2040 General Plan and includes additional reduction measures to achieve the 2030 GHG emissions target. The goals, policies, and measures address green building practices, transportation strategies, energy use, water conservation and water reduction; collectively these sectors contribute to the City's GHG reductions and advancement of its broad sustainability goal. The 2030 GHGRS also includes emissions forecasts that were prepared to align with the future buildout conditions in the Envision San José 2040 General Plan horizon year, including its future estimates of the local population, employment, and travel demand consistent with the City's Land Use and Transportation Diagram.

Relationship to the Climate Smart San José

The City Council approved Climate Smart San José in February 2018. Climate Smart San José is the City's overarching visionary plan to reduce emissions geared toward the Paris Agreement. It is also an update to the City's 2007 Green Vision and a roadmap to deep carbon reductions aligned with the State's GHG targets set by AB 32, SB 32, and EO S-3-05, while supporting 40 percent growth in the City's population by 2050 and continued economic growth. It employs a people-centered approach, encouraging the entire San José community to join an ambitious campaign to reduce GHG emissions, save water, and improve the community's quality of life, while also promoting economic growth. As a visionary document, Climate Smart San José is not a Climate Action Plan for the purpose of tiering and streamlining CEQA analysis of GHG emissions under CEQA. However, certain programs from Climate Smart San José, such as San José Clean Energy and measures to improve energy efficiency in residential construction, are incorporated into the 2030 GHGRS.

This 2030 GHGRS provides focused near-term or interim steps to measurable actions the City can take to reduce its GHG emissions over this decade to achieve the 2030 target. While the emissions reduction measures in the 2030 GHGRS are consistent with the Climate Smart San José strategies, the GHGRS is prepared for the purpose of tiering and streamlining the analysis of GHG emissions under CEQA Guidelines Section 15183.5 (b) (1). This streamlines GHG emissions analysis for future development projects under CEQA as a qualified Climate Action Plan.

Relationship with California Environmental Quality Act (CEQA)

Local governments may prepare a greenhouse gas reduction strategy that can be used for CEQA review of subsequent plans and projects that are consistent with the GHG reduction strategies and targets. This approach allows jurisdictions to:

- Address GHG emissions at a communitywide and municipal operations level to determine the most effective and efficient methods to reduce GHG emissions;
- Identify reduction measures that promote goals of the General Plan; and
- Implement reduction measures that achieve multiple City priorities, such as those that provide additional co-benefits beyond their emissions reductions (such as, improving mobility and access, advancing local economic development, reducing household and business utility and transportation costs, improving public health, etc.)

Corresponding to the requirements of State CEQA Guidelines Section 15183.5, 15064(h)(3) and 15130(d), the Bay Area Air Quality Management District (BAAQMD) encourages local governments to adopt a qualified GHG reduction strategy that is consistent with AB 32. In accordance with the BAAQMD May 2017 CEQA Air Quality Guidelines, it can be presumed that a project consistent with an adopted qualified GHG reduction strategy would not have significant GHG emissions impacts.

Comments Received Prior to the Planning Commission Hearing

Staff received two comments prior to the October 14, 2020 Planning Commission hearing: an e-mail from Valley Water dated October 13, 2020 and a letter from BAAQMD dated October 14, 2020 (documents attached).

Valley Water recommended several text edits to the Initial Study/Addendum and 2030 GHGRS, sought clarification on the City's water conservation target and requested that additional water conservation measures be included in GHGRS Strategy 7 (Water Conservation).

Response: The 2030 conservation target was identified consistent with the water conservation goals set in Climate Smart San José. The 2030 GHGRS does not include specific water conservation measures but leverages existing City programs for water conservation. Chapter 4 ("Emissions Reduction Policies and Measures") of the 2030 GHGRS identifies water conservation programs implemented by Valley Water, as well as water waste prevention and water shortage measures codified in the City's Municipal Code. Future programs or code changes, such as changes to the City's Water Efficient Landscaping Ordinance, will be reflected in subsequent GHG emissions inventories during the General Plan 4-Year Review process.

In its letter, BAAQMD commended the City's efforts but urged the City to look beyond the 2030 GHG reduction targets. BAAQMD also requested the quantitative analysis used to support the 2030 GHGRS be made available, the inclusion of specific measures for data centers, and that more voluntary measures be made mandatory.

Response: As discussed in the Planning Commission staff report, the achievement of GHG reduction goals post-2030 requires an aggressive multiple-pronged approach that includes policy decisions and additional emission controls at the federal and state level, new and substantially advanced technologies, and substantial behavioral changes related to land use/transportation. Future policy and regulatory decisions by other agencies and technological advances that result in significant GHG emission reductions are outside the City's control. Therefore, these cannot be relied upon as feasible mitigation strategies at the time of this update to the City's GHG Reduction Strategy. Rather, the 2030 GHGRS is a tailored, focused interim plan to bring the GHG emissions down by 2030, with a trend towards meeting the long-term statewide goals. The City's GHGRS will be updated based on future Citywide GHG emissions inventories, new guidance, and new policies to meet targets after 2030. However, the City's General Plan has a plan horizon of 2040, and General Plan policies that would provide reduction of GHG emissions identified in the GHGRS would extend beyond 2030. In terms of BAAQMD's comments regarding specific measures for data centers, the GHGRS is not intended to include policies that

apply to a specific type of project. Like all projects using the 2030 GHGRS for CEQA coverage, data centers must be evaluated using the Development Compliance Checklist as part of their environmental review and may be subject to additional measures or a project-specific GHG analysis, consistent with Section 15064.4 of the State CEQA Guidelines. Finally, it is not necessary to make all voluntary measures mandatory to meet the 2030 GHG reduction targets. The voluntary measures enable applicants to decide which measures are most appropriate for their project.

Planning Commission Hearing

On October 14, 2020, the Planning Commission held a public hearing via teleconference to consider and make a recommendation on the 2030 GHGRS. Planning staff and a representative from AECOM, the consultant who prepared the draft 2030 GHGRS on behalf of the City, presented an oral staff report on the background and purpose of the strategy. The Commission then received public comments from two people, but their comments did not focus on the content of the GHGRS beyond a recommendation that carbon free energy identified in the Plan not include nuclear energy. The Planning Commission did not discuss the item or seek clarification from staff. Commissioner Bonilla made a motion to adopt Staff's recommendation, and Commissioner Oliverio seconded the motion. The motion passed unanimously.

ANALYSIS

Analysis and discussion of the GHGRS can be found in the attached Planning Commission Staff Report (Attachment A).

CONCLUSION

The Planning Commission recommended that the City Council adopt a resolution adopting the Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report and Supplemental Environmental Impact Report, and Addenda thereto; and adopt a resolution approving the 2030 Greenhouse Gas Reduction Strategy and supporting reports and the General Plan Text Amendment to revise Policy IP-3.7 and remove Action IP-3.10 of Chapter 7 of the Envision San José 2040 General Plan. If approved, the 2030 Greenhouse Gas Reduction Strategy will be effective 30 days after approval by City Council.

EVALUATION AND FOLLOW-UP

If the City Council approves the Planning Commission recommendation, , the City will have an adopted GHGRS for the purposes of streamlining program- and project-level GHG analysis for CEQA consistent with the GHG reduction targets in SB 32.

CLIMATE SMART SAN JOSÉ

The recommendation in this memorandum aligns with Climate Smart San José's goals and incorporates applicable policies in Climate Smart San José to achieve the 2030 Citywide GHG reduction goals consistent with SB 32. Climate Smart San José policies incorporated into the GHGRS include San José Clean Energy, Zero Net Carbon Residential Construction, renewable energy development, building retrofits, and water conservation measures.

PUBLIC OUTREACH

Staff followed Council Policy 6-30: Public Outreach Policy. During preparation of the document and Development Compliance Checklist, staff sought feedback from environmental consultants on the City's list of Approved Environmental Consultants for Private Projects. Staff also presented the highlights of the draft GHGRS at the Developer's Roundtable on August 14, 2020 and at the Environmental Consultants Roundtable on July 31, 2020. All documents are posted to the City's website; notifications were sent via e-mail to environmental interest groups and via newsflash to subscribers to the City's Planning notification list. A notice of the public hearing was published in the San José Post Record and posted on the City's website. The staff report is also posted on the City's website and staff has been available to respond to questions from the public.

COORDINATION

This project was coordinated with the Environmental Services Department, San José Clean Energy, and the City Attorney's Office.

CEQA

Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report (Resolution No. 76041) and Supplemental Environmental Impact Report to the Envision San José General Plan Final Program Environmental Impact Report (Resolution No. 77617), and Addenda thereto. The Addendum and supporting documents can be found at <https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/2030-ghgrs-addendum>.

/s/

Rosalynn Hughey, Secretary
Planning Commission

For questions, please contact Deputy Director, Robert Manford, at Robert.Manford@sanjoseca.gov or (408) 535-7900.

Attachments:

- A) [Planning Commission Packet including Staff Report for the October 14, 2020 Planning Commission Hearing, 2030 GHGRS, and supporting documents](#)
- B) E-mail from Lisa Brancatelli at Valley Water, dated October 13, 2020
- C) Letter from Greg Nudd at BAAQMD, dated October 14, 2020



Memorandum

TO: PLANNING COMMISSION
SUBJECT: File No. PP20-012 & GPT20-002

FROM: Rosalynn Hughey
DATE: October 14, 2020

COUNCIL DISTRICT: Citywide

Type of Permit	City-Initiated 2030 Greenhouse Gas Reduction Strategy and General Plan Text Amendment
Project Planner	David Keyon, Principal Planner and Jared Hart, Division Manager
CEQA Clearance	Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report (Resolution No. 76041) and Supplemental Environmental Impact Report to the Envision San Jose General Plan Final Program Environmental Impact Report (Resolution No. 77617), and all Addenda thereto.

RECOMMENDATION

Staff recommends that the Planning Commission recommend to the City Council to take all of the following actions:

1. Adopt a resolution adopting the Addendum to the Envision San José 2040 General Plan Final Program Environmental Impact Report (Resolution No. 76041) and Supplemental Environmental Impact Report to the Envision San Jose General Plan Final Program Environmental Impact Report (Resolution No. 77617), and Addenda thereto in conformance with CEQA; and
2. Adopt a resolution approving (i) amendments to Appendix 8 of the Envision San José 2040 General Plan by replacing the existing Greenhouse Gas Reduction Strategy with the updated 2030 Greenhouse Gas Reduction Strategy; and (ii) the General Plan Text Amendments to revise Policy IP-3.7 and delete Action IP-3.10 of Chapter 7 of the Envision San José 2040 General Plan.

PROJECT BACKGROUND TO 2030 GHGRS

Introduction: The City prepared its first Greenhouse Gas Reduction Strategy (GHGRS) in combination with the *Envision San José 2040 General Plan Update* in 2011, thereafter updated in 2015. Since the GHGRS update in 2015, the State of California (State) has expanded on AB 32 by establishment of the statewide GHG reduction targets for 2030 of Senate Bill 32, followed by an Executive Order (EO B-55-18) defining a carbon neutrality goal for the state to be achieved by 2045.

This GHGRS update (referred to as the 2030 GHGRS or the Plan) builds on the goals of the previous GHGRS and furthers the strategies embedded in other City plans to align with the State's 2030 GHG target (SB 32) and with consideration for the State's long-term emissions goal.

Relationship to Envision San José 2040: This 2030 GHGRS is developed under General Plan Policy IP-3.7 to monitor and update as necessary the GHG reduction strategy measures and IP-17.2 to develop and maintain a Greenhouse Gas Reduction Strategy to serve as a road map for reducing GHG emissions within San José. *The 2030 GHGRS will replace the existing GHGRS in Appendix 8 of the Envision San José 2040 General Plan.* The current General Plan policies direct the City to:

Policy IP-3.7: *Monitor, evaluate and annually report on the success of the programs and actions contained within the Greenhouse Gas Reduction City Council Policy to demonstrate progress toward achieving required State of California Greenhouse Gas reduction targets (at or below 1990-equivalent levels) by 2020, 2030, 2040 and 2050. Refine existing programs and/or identify new programs and actions to ensure compliance and update the Council Policy as necessary.*

Policy IP-17.2: *Develop and maintain a Greenhouse Gas Reduction Strategy or equivalent policy document as a road map for the reduction of greenhouse gas emissions within San José, including those with a direct relationship to land use and transportation. The Greenhouse Gas Reduction Strategy identifies the specific items within the Envision San José 2040 General Plan that contribute to the reduction of greenhouse gas emissions and considers the degree to which they will achieve its goals. The Envision General Plan and Land Use / Transportation Diagram contain multiple goals and policies which will contribute to the City's reduction of greenhouse gas emissions, including a significant reliance upon new growth taking place in a more compact urban form that facilitates walking, mass transit, or bicycling.*

To that end, the proposed 2030 GHGRS provides an update of current emissions levels based on a 2017 emissions inventory, establishes a new 2030 emissions target consistent with SB 32, and assesses the City's progress and achievement pathway toward its 2030 GHG targets. The 2030 emissions target is an interim target to meet the State's long-term goal of reducing statewide emissions to 80% below 1990 levels by 2050 per Executive Order EO S-3-05.

The 2030 GHGRS is consistent with the major strategies and policies within the *Envision San José 2040* General Plan and includes additional reduction measures to achieve the Plan's 2030 GHG emissions target. The goals, policies, and measures address green building practices, transportation strategies, energy use, water conservation and water reduction and collectively these sectors contribute to the City's GHG reductions and advancement of its broad sustainability goal. The 2030 GHGRS also includes emissions forecasts that were prepared to align with the future buildout conditions in the *Envision San José 2040 General Plan* horizon year, including its future estimates of the local population, employment, and travel demand consistent with the City's Land Use and Transportation Diagram.

Relationship to the Climate Smart San José: The City Council approved *Climate Smart San José* in February 2018. Climate Smart San Jose is the City's overarching visionary plan to reduce emissions geared toward the Paris Agreement. It is also an update to the City's 2007 Green Vision, and roadmap to deep carbon reductions aligned with the State's GHG targets set by AB 32, SB 32, and EO S-3-05, while supporting 40 percent growth in the City's population by 2050 and continued economic growth. It employs a people-centered approach, encouraging the entire San José community to join an ambitious campaign to reduce GHG emissions, save water, and improve the community's quality of

life, while also promoting economic growth. As a visionary document, Climate Smart San Jose is not a Climate Action Plan for the purpose of tiering and streamlining CEQA analysis of GHG emissions under CEQA. However, certain programs from Climate Smart San Jose, such as San Jose Clean Energy and measures to improve energy efficiency in residential construction, are incorporated into the 2030 GHGRS.

This 2030 GHGRS provides focused ***near-term or interim steps*** to measurable actions the City can take to reduce its GHG emissions over this decade to achieve the 2030 target. While the emissions reduction measures in the 2030 GHGRS are consistent with the *Climate Smart San José* strategies, the GHGRS is prepared for the purpose of tiering and streamlining the analysis of GHG emissions under CEQA Guidelines Section 15183.5 (b) (1). This streamlines GHG emissions analysis for future development projects under CEQA as a qualified Climate Action Plan.

Context for 2030 GHGRS and Long-term GHG Reductions: Executive Order S-3-05 (EO S-3-05) was issued in 2005 and established a long-term GHG emission reduction targets for California by 2050, the state would reduce GHG emissions to 80 percent below 1990 levels. The long-term 2050 target represents the level scientists believe is necessary to reach atmospheric GHG concentrations (below 350 ppm CO₂e) that will stabilize climate change. The 2030 GHGRS is focused on meeting the interim statewide 2030 emissions target consistent with SB 32 of 40% below 1990 emissions by 2030. This interim target demonstrates a trend toward meeting the State's long-term goal of reducing statewide emissions to 80% below 1990 levels by 2050 per Executive Order EO S-3-05 as information, data, and technology continue to improve and are available over time.

Climate Smart San José represents a road map towards the long-term carbon neutrality goal but is not a Climate Action Plan for the purpose of CEQA streamlining. The achievement of the 2050 GHG reduction goals requires an aggressive multiple-pronged approach that includes policy decisions and additional emission controls at the federal and state level, new and substantially advanced technologies, and substantial behavioral changes related to land use/transportation to reduce single occupant vehicle trips—especially to and from workplaces.

Purpose of the 2030 GHGRS: The proposed Plan aims to achieve the following broad objectives:

- Develop an interim 2030 emissions target that is consistent with the State's adopted 2030 GHG target and demonstrates San José's fair share reductions toward statewide target achievement, and demonstrates progress toward meeting the state's 2050 reduction target in EO S-3-05;
- Analyze and compare the City's base year inventories (2008 and 2014) with the 2017 GHG inventory, emissions trends over time, and forecasts in comparison to the identified emissions target;
- Identify policies, plans, and programs that will contribute to GHG reductions in the City and achievement of the City's 2030 target, including actions that implement the City's *Envision San José 2040 General Plan*;
- Provide a roadmap by which the City can reduce its GHG emissions to achieve the identified target, by application of a development checklist that identifies clear implementable strategies for GHG reductions that new projects in the City must implement to demonstrate consistency with the 2030 GHGRS; and
- Serve as a GHG reduction plan to streamline GHG emissions analysis of future development and plans within the City, according to CEQA Guidelines Sections 15152, 15183, and 15183.5.

Relationship with California Environmental Quality Act [CEQA]: Local governments may prepare a greenhouse gas reduction strategy that can be used for CEQA review of subsequent plans and projects that are consistent with the GHG reduction strategies and targets. This approach allows jurisdictions to:

- Address GHG emissions at a communitywide and municipal operations level to determine the most effective and efficient methods to reduce GHG emissions;
- Identify reduction measures that promote goals of the General Plan; and
- Implement reduction measures that achieve multiple City priorities, such as those that provide additional co-benefits beyond their emissions reductions (such as, improving mobility and access, advancing local economic development, reducing household and business utility and transportation costs, improving public health, etc.)

Qualified Climate Action Plans under CEQA: Corresponding to the requirements of State CEQA Guidelines Section 15183.5, 15064(h)(3) and 15130(d), BAAQMD encourages local governments to adopt a qualified GHG reduction strategy that is consistent with AB 32. In accordance with the BAAQMD May 2017 CEQA Air Quality Guidelines, it can be presumed that a project consistent with an adopted qualified GHG reduction strategy would not have significant GHG emissions impacts.

A GHG reduction strategy may be a single plan, or could be a collection of climate action policies, plans, ordinances, and programs that have been legislatively adopted by a local jurisdiction. BAAQMD recommends the elements identified in the State CEQA Guidelines, Section 15183.5 as a minimum standard to meet the GHG reduction strategy thresholds of significance option.¹ The 2030 GHGRS is consistent with the following CEQA requirements for a “qualified GHG reduction strategy.”

1. Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
2. Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the Plan would not be cumulatively considerable.
3. Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the defined geographic area.
4. 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.
5. Establish a mechanism to monitor the Plan’s progress towards achieving the level and to require amendment if the Plan is not achieving specified levels.
6. Be adopted in a public process following environmental review.

¹ BAAQMD, California Environmental Quality Act Air Quality Guidelines, May 2017, Accessed June 24, 2019.

PROPOSED GENERAL PLAN TEXT AMENDMENT

The proposed General Plan Text Amendment will modify Policy IP-3.7 and remove Action IP-3.10 of Chapter 7 in the Envision San José 2040 General Plan as follows in strikethrough/underline format:

General Plan Annual Review and Measurable Sustainability Policy IP-3.7

Monitor, evaluate and annually report on the success of the programs and actions contained within the Greenhouse Gas Reduction Strategy ~~City Council Policy~~ to demonstrate progress toward achieving required State of California Greenhouse Gas reduction targets (at or below 1990-equivalent levels) by 2020, 2030, 2040 and 2050. Refine existing programs and/or identify new programs and actions to ensure compliance and update the Council Policy as necessary.

Text Reference

Envision San José 2040 General Plan, Chapter 7 (“Implementation”), “Implementation” section, page 12.

General Plan Annual Review and Measurable Sustainability Action IP-3.10

~~To facilitate implementation of greenhouse gas reduction measures as part of development review, adopt a City Council Policy that guides analyses and determinations regarding the conformance of proposed development with the City’s adopted Greenhouse Gas Emission Reduction Strategy. Adopt a City Council Policy within two years of completion of the Second Update to the California Climate Scoping Plan.~~

Text Reference

Envision San José 2040 General Plan, Chapter 7 (“Implementation”), “Implementation” section, page 14.

The proposed General Plan Text Amendment makes a minor clarifying revision to Policy IP-3.7 and deletes Action IP-3.10. Action IP-3.10 discusses adoption of a City Council Policy to guide analysis of development projects for conformance with GHGRS. This is no longer needed and redundant to the development checklist developed as part of the 2030 GHGRS. The 2030 GHGRS includes a checklist that identifies implementable strategies for GHG reductions that new development projects must implement to demonstrate consistency with the 2030 GHGRS. Additionally, development projects considered by City Council must also evaluate consistency with Climate Smart San Jose as required through the City Council memorandum template.

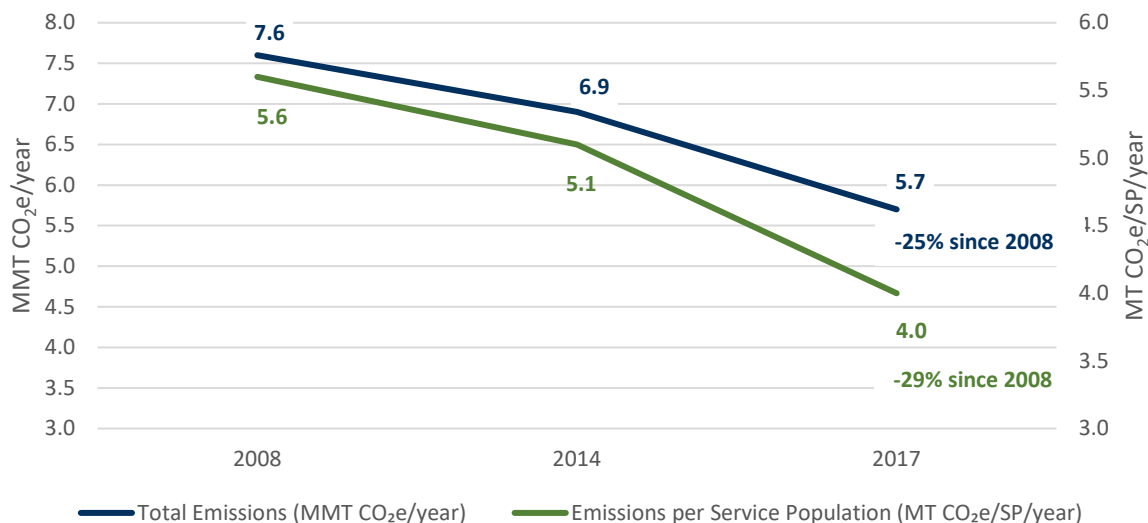
ANALYSIS FOR THE 2030 GHGRS

The City’s approach to setting a local 2030 GHG reduction target is in alignment with the State targets, in addition to furthering the goals and actions within the Envision San José 2040 General Plan and the Climate Smart San José’s sustainability goals. San José demonstrated environmental leadership with the adoption of the City Council Policy 5-1 on Vehicle Miles Traveled (VMT) and the Clean Energy San José in February 2018 has also paved the path forward for setting the 2030 GHG Reduction targets. Further details on the target setting process are included in Appendix B—Target Setting Memorandum. Establishing local GHG emissions targets can be used to:

- Demonstrate the City's commitment to global efforts on climate change,
- Illustrate the relationship between the City's reduction target and the state's reduction goals,
- Provide a goal post against which to evaluate the cumulative progress of the City's GHG reduction actions over time, and
- Demonstrate a level of GHG emissions below which the City would have less than cumulatively considerable GHG impacts.²

2017 GHG Inventory: A citywide GHG inventory, prepared according to the Global Protocol for Community Scale GHG Inventories (GPC), provided the technical underpinning for the 2030 GHGRS Update process. As seen in Figure 1, the total greenhouse gas emissions decreased from 7.6 to 5.7 MMT CO₂e between 2008 and 2017. From 2008 to 2017, San José's service population increased by 6.5 percent, yet emissions intensity declined from 5.6 to 4.0 MT CO₂e/SP. This decrease of nearly 30 percent in terms of emissions intensity.

Figure 1– Emissions Trends toward 2020 GHGRS Target Year



Despite the increase in the service population by approximately 6.5 percent from 2008 to 2017 in the City, the annual citywide GHG emissions decreased by 25 percent, demonstrates the City's ability to accommodate increased population and employment growth in a more emissions-efficient manner on a per unit basis (e.g., per service population). In 2017, emissions intensity reached 4.0 MT CO₂e/SP, which is well below the City's established 2020 GHG target of 6.6 MT CO₂e/SP.

Emissions Forecast for 2030: Based on the *Envision San José 2040 General Plan* growth assumptions, Figure 2 illustrates the City's emissions forecasts for year 2030 as an interim goal under SB 32. Further, the 2040 forecasts are also examined as they align with the *Envision San José 2040 General Plan* buildout year.

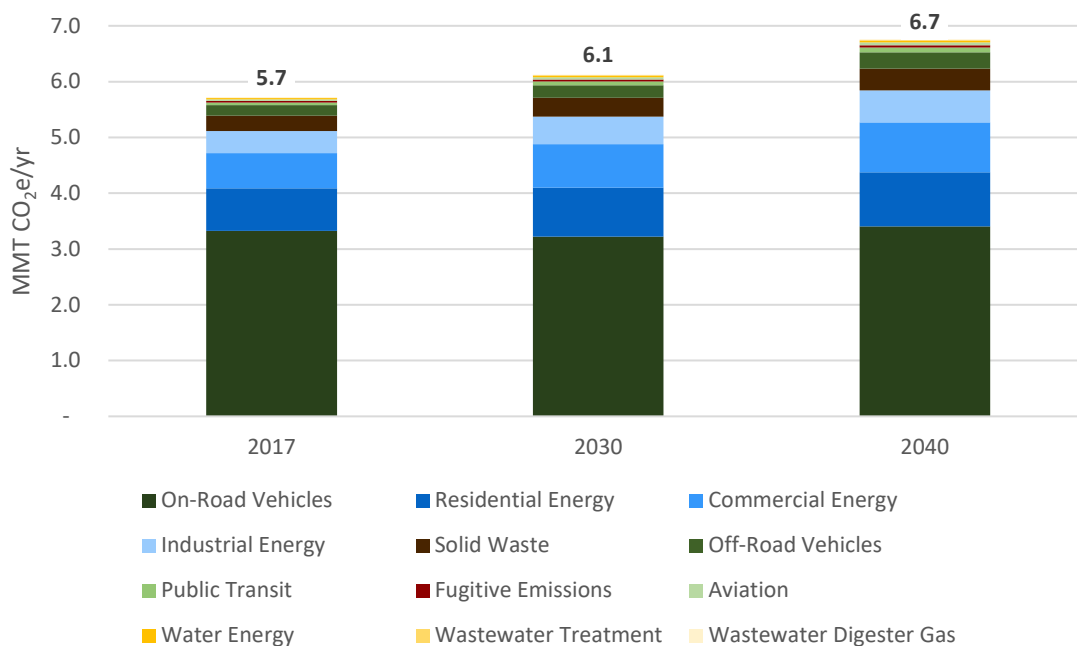
Under SB 32, a 40 percent emissions reduction from 1990 levels is considered a necessary interim target and an interim step to ensure that the state meets its long-term goal of an 80 percent reduction from 1990 levels by the year 2050. Figure 2 below illustrates the emissions forecast for 2030 and 2040. Emissions are estimated to increase by 7 percent from 2017-2030 and nearly 18 percent from 2017-

² The City's target, along with reduction strategies necessary to achieve this target, will facilitate tiering and streamlining for proposed projects under the provisions of CEQA Guidelines Section 15183.5.

2040, if no additional reduction actions are taken.

While the total overall emissions are projected to increase, the emission per capita and per service population are projected to decrease based on existing policies and programs. Based on population and employment forecasts from the City's 2040 General Plan, the per-service population emissions intensity is forecast to decrease by 14 percent below 2017 levels by 2030, from 4.0 MT CO₂e/SP in 2017 to 3.4 MT CO₂e/SP in 2030. Emissions intensity is forecast to decrease further by 2040, declining 17 percent below 2017 levels and reaching 3.3 MT CO₂e/SP.

Figure 2 – Emissions Forecast 2017-2030-2040



Source: Appendix C — Greenhouse Gas Emissions Reductions Strategies Memorandum [August 2019]

Emissions Target Selection: The 2030 GHG emissions target selection process went through an analysis of different target options and ultimately selected a target that aligns with the State's SB 32 target. Using the current guidance to local governments from ARB and OPR, the 2030 GHG target is tailored to match the emissions sectors included locally in the City's inventory and provides a simple calculation metric for tracking progress towards the target achievement.

The City's 2030 target is expressed as an emissions intensity value (i.e., MT CO₂e/service population) and its corresponding mass emissions value (i.e., MMT CO₂e/year) based on the service population forecasts associated with the 2040 General Plan. As shown below, the 2030 target is derived as:

- **Emissions Intensity – 2.94 MT CO₂e per service population by 2030, and**
- **Mass Emissions – 5.3 million MT CO₂e/year in 2030**

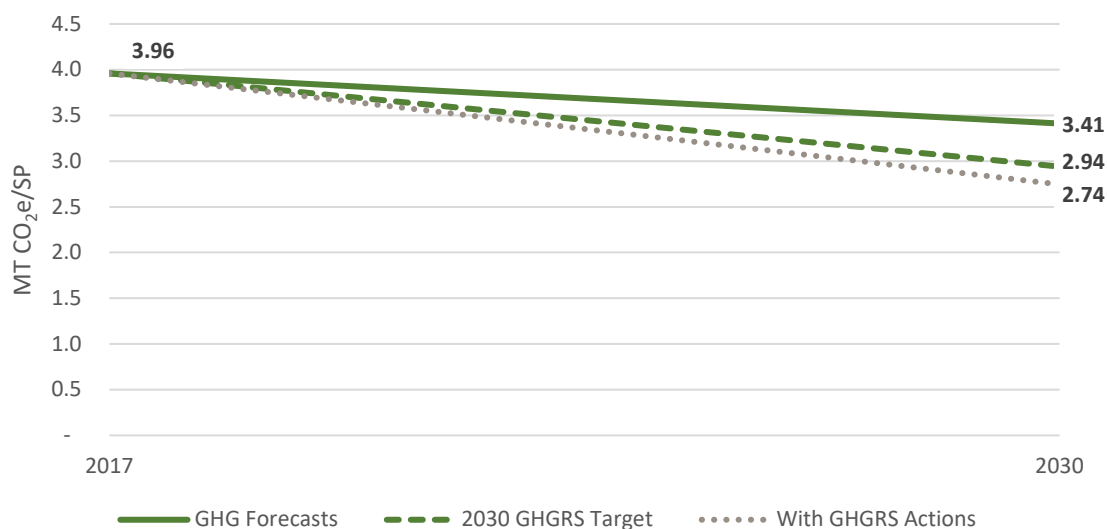
Table A: 2030 GHGRS Target Metrics

Target Metrics	2017 Inventory	2030 Forecast	2030 Target	Delta Between 2030 Forecast and Target
Mass Emissions (MMT CO ₂ e/year)	5.7	6.1	5.3	0.8
Emissions Intensity (MT CO ₂ e/service population)	3.96	3.41	2.94	0.47
Service Population	1,442,690	1,793,289	-	-

Note: The 2030 mass emissions target value is calculated by multiplying the 2030 emissions intensity target and the 2030 service population estimate.

Source: Appendix C— GHG Emissions Reduction Target Options Memorandum

2030 GHG Reduction Strategies: The City has identified seven strategies enumerated in Table B below, to reduce GHG emissions to achieve the 2030 target. These strategies leverage the city’s current programs and plans and span across energy, building, land-use—transportation, water, and waste sectors. Table B also enumerates the estimated GHG reductions from each Strategy by 2030 and identifies the sources of origin for the strategies to demonstrate the overlap with state regulations or policies and the City’s sustainability-related plans and policies. Based on the modeled GHG reductions, these Strategies collectively provide at least the necessary 1.0 million metric tons of CO₂e annually in mass emissions reductions. The projected reduction potential of the GHG strategies is illustrated in Figure 3 below.

Figure 3: 2030 GHG Reduction Strategies and Reduction Potential

Source: Appendix C — Greenhouse Gas Emissions Reductions Strategies Memorandum [August 2019]

Table B: 2030 GHG Reduction Strategies and Reduction Potential

Strategy Title	2030 Reductions MT CO ₂ e/year	Strategy Origins
GHGRS 1 San José Clean Energy	655,104	Green Vision Goal 3 Climate Smart San José (CSSJ) Strategy 1.1
GHGRS – 2 Zero Net Carbon Residential Construction	43,678	California Energy Efficiency Strategic Plan CSSJ Strategy 2.2 General Plan Goal MS-14
GHGRS – 3 Renewable Energy Development	63,697	Green Vision Goal 3 CSSJ Strategy 1.1 General Plan Goal MS-2
GHGRS – 4 Existing Building Retrofits – Natural Gas	208,986	Senate Bill 350 CSSJ Strategy 2.2 General Plan Goal MS-2
GHGRS – 5 Zero Waste Goal	207,956	Green Vision Goal 5 General Plan Goal MS-5 Council Resolution 74077
GHGRS – 6 Caltrain Modernization Project	12,547	CSSJ Strategy 2.4
GHGRS – 7 Water Conservation	3,106	CSSJ Strategy 1.2 General Plan Goal MS-3
Total Emission Reductions (MT CO₂e/year)	1,195,074	-
Total Emission Reductions in MMT CO₂e/year	1.2	-

CSSJ = Climate Smart San José

Source: Appendix C — Greenhouse Gas Emissions Reductions Strategies Memorandum [August 2019]

Implementation of the 2030 GHGRS: Application of the 2030 GHGRS to development review through the planning entitlement process will ensure that the GHG reduction measures translate to on-the-ground results to achieve the interim 2030 reduction target. A Development Consistency Checklist (Attachment A in the 2030 GHGRS) applies to all discretionary reviews through the City's Planning, Building and Code Enforcement Department (PBCE). To help facilitate the implementation of the 2030 GHGRS, each strategy contains implementation information that identifies the strategy's GHG reduction potential in 2030, the performance standards associated with the GHG reduction estimates, and the initial implementation steps to help achieve the reduction levels.

Compliance Checklist: The purpose of the Development Consistency Checklist is to apply the 2030 GHGRS to provide a streamlined review process for proposed new development projects subject to discretionary review and the environmental review under the California Environmental Quality Act (CEQA).

In accordance with CEQA Guidelines Section 15183.5, analysis of the GHG emissions and potential climate change impacts for new developments is a requirement. Further, a project's incremental contribution to a cumulative GHG emissions effects may be determined not to be cumulatively considerable if it complies with the requirements of the approved qualified climate action plan to demonstrate project-level GHG reductions.

Progress towards the 2030 GHG Reduction Target: The 2030 GHGRS can be evaluated for progress in at least two ways: (a) evaluation of the changes in the City's overall GHG emissions over time, and (b) evaluation of the performance of individual GHGRS strategies. Citywide emissions inventories provide the best indication of the effectiveness of the GHG reduction strategies

Periodic inventory will enable a direct comparison to the 2017 base year inventory and measurement of progress toward meeting the City's reduction targets. At a minimum, inventory updates should occur on a three- to five-year cycle to be consistent with BAAQMD's requirements for a qualified GHGRS. The City will evaluate the implementation of the 2030 GHGRS as part of the General Plan 4-year major review.

ENVISION SAN JOSE GENERAL PLAN CONFORMANCE

The proposed 2030 Greenhouse Gas Reduction Strategy and associated General Plan Text Amendment is *consistent* with the following Major Strategies, goals, and policies of the Envision San Jose 2040 General Plan:

1. **Major Strategy #7 – Measurable Sustainability / Environmental Stewardship:** The

Measurable Sustainability/Environmental Stewardship major strategy establishes goals and policies to minimize waste, efficiently use natural resources, and manage and conserve resources for use by present and future generations. As the City's guide for growth and development, the General Plan is a unique tool to shape its growth, minimize its impacts on resource consumption, reduce its contribution to global warming, and to preserve and enhance its natural environment.

2. **Environmental Leadership / Stewardship Policy IP-17.2:** Develop and maintain a Greenhouse Gas Reduction Strategy or equivalent policy document as a road map Addendum to Final for the reduction of greenhouse gas emissions within San José, including those with a direct relationship to land use and transportation. The Greenhouse Gas Reduction Strategy identifies the specific items within the Envision General Plan that contribute to the reduction of greenhouse gas emissions and considers the degree to which they will achieve its goals. The Envision General Plan and Land Use / Transportation Diagram contain multiple goals and policies which will contribute to the City's reduction of greenhouse gas emissions, including a significant reliance upon new growth taking place in a more compact urban form that facilitates walking, mass transit, or bicycling.

Analysis: The Envision San José 2040 General Plan is the City's guide for development and serves as a tool to shape the City's growth, minimize its impacts on resource consumption, reduce its contribution to global warming, and preserve and enhance its natural environment. This 2030 GHGRS is a comprehensive update to the original GHGRS and provides an update of current emissions levels, establishes a new 2030 emissions target consistent with SB 32, and assesses the City's progress and achievement pathway toward its 2020 and 2030 GHG targets. The proposed 2030 GHGRS advances the Measurable Sustainability Major Strategy and Policy IP-17.2 by

building on existing General Plan goals and polices to reduce greenhouse gas emissions and includes additional reduction measures based on the City's existing policies, plans, and programs to achieve the GHGRS's 2030 GHG emissions target.

3. **Energy Conservation and Renewable Energy Use Goal MS-2:** Integrate affordable housing in identified growth locations and where other housing opportunities may exist, consistent with the Envision General Plan.
4. **Water Conservation and Quality Goal MS-3:** Maximize the use of green building practices in new and existing development to minimize use of potable water and to reduce water pollution.
5. **Waste Diversion Goal MS-5:** Divert 100% of waste from landfills by 2022 and maintain 100% diversion through 2040.
6. **Waste Diversion Goal MS-15:** Receive 100% of electrical power from clean renewable sources (e.g., solar, wind, hydrogen) by 2022 and to the greatest degree feasible increase generation of clean, renewable energy within the City to meet its own energy consumption needs.

Analysis: The 2030 GHGRS identifies seven strategies to reduce GHG emissions as listed above in Table B above. The strategies include topic areas including energy, building, land use and transportation, water, and waste. Goals MS-2, MS-3, MS-5, and MS-15 and their associated policies serve as a base for five of the seven strategies that serve as a road map for the reduction of greenhouse gas emissions within San José in order to achieve the state's adopted 2030 GHG target.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The proposed 2030 GHGRS and related General Plan Text Amendment does not include any construction, demolition, or other activity that has the potential to negatively impact the environment. Pursuant to Section 15162 and 15164 of the CEQA Guidelines, the City of San José has prepared an Addendum to the approved Envision San José 2040 General Plan, and the Final Program EIR for the Envision San José 2040 General Plan and Supplemental EIR to the Envision San José 2040 General Plan EIR, and Addenda thereto, for which findings were adopted by City Council Resolution Nos. 76041 and 77617 respectively, that adequately describe the activity for the purposes of CEQA. Both of these EIRs are posted to the City's Completed EIRs website at www.sanjoseca.gov/completedeirs

PUBLIC OUTREACH

Staff followed Council Policy 6-30: Public Outreach Policy. During preparation of the document and Development Compliance Checklist, staff sought feedback from environmental consultants on the City's list of Approved Environmental Consultants for Private Projects. Staff also presented the highlights of the draft GHGRS at the Developer's Roundtable on August 14, 2020 and at the Environmental Consultants Roundtable on July 31, 2020. All documents are posted to the City's website, and notifications sent via e-mail to environmental interest groups and via newsflash to subscribers to the City's Planning notification list. A notice of the public hearing was published in the San Jose Post Record and posted on the City's website. The staff report is also posted on the City's website and staff has been available to respond to questions from the public.

Project Manager:	David Keyon, Principal Planner and Jared Hart, Division Manager
Approved by:	/s/ Deputy Director for Rosalynn Hughey, Director PBCE

ATTACHMENTS:

Exhibit A:	<p>2030 Greenhouse Gas Reduction Strategy [2030 GHGRS]: https://www.sanjoseca.gov/Home/ShowDocument?id=63605 Attachment A - Development Compliance Checklist: https://www.sanjoseca.gov/Home/ShowDocument?id=63603 Appendix A - 2017 Inventory of Community Greenhouse Gas Emissions by ICLEI, dated April 2019: https://www.sanjoseca.gov/Home/ShowDocument?id=63597 Appendix B - GHG emissions Reduction Target Options Memorandum, dated June 2019: https://www.sanjoseca.gov/Home/ShowDocument?id=63597 Appendix C – Greenhouse Gas Emissions Reductions Strategies Memorandum, dated August 2019: https://www.sanjoseca.gov/Home/ShowDocument?id=63601</p>
Exhibit B:	<p>2030 GHGRS Addendum to Program EIR for the Envision San José 2040 General Plan and Supplemental EIR to the Envision San José 2040 General Plan EIR, and Addenda thereto https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/2030-ghgrs-addendum</p> <ul style="list-style-type: none"> • Envision San José 2040 General Plan FEIR: https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/completed-eirs/envision-san-jose-2040-general-plan-4-year/envision-san-jos-2040-general-plan • Envision San José 2040 General Plan Supplemental Program EIR: https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/completed-eirs/envision-san-jose-2040-supplemental-program
Exhibit C:	Addendum to Program EIR for the Envision San José 2040 General Plan and Supplemental EIR to the Envision San José 2040 General Plan EIR Resolution
Exhibit D:	General Plan Text Amendment Resolution

GPT20-002 & PP20-012 List of Attachments

Exhibit A: 2030 Greenhouse Gas Reduction Strategy [2030 GHGRS]:

<https://www.sanjoseca.gov/Home/ShowDocument?id=63605>

Attachment A- Development Compliance Checklist:

<https://www.sanjoseca.gov/Home/ShowDocument?id=63603>

Appendix A- 2017 Inventory of Community Greenhouse Gas Emissions by ICLEI, dated April 2019:

<https://www.sanjoseca.gov/Home/ShowDocument?id=63597>

Appendix B- GHG Emissions Reduction Target Options Memorandum dated June 2019:

<https://www.sanjoseca.gov/Home/ShowDocument?id=63597>

Appendix C- Greenhouse Gas Emissions Reduction Strategies Memorandum, dated August 2019:

<https://www.sanjoseca.gov/Home/ShowDocument?id=63601>

Exhibit B: 2030 GHGRS Addendum to Program EIR for the Envision San José 2040 General Plan and Supplemental EIR to the Envision San José 2040 General Plan EIR, and Addenda thereto

<https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/2030-ghgrs-addendum>

- Envision San José 2040 General Plan FEIR:

<https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/completed-eirs/envision-san-jose-2040-general-plan-4-year/envision-san-jos-2040-general-plan>

- Envision San José 2040 General Plan Supplemental Program EIR:

<https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/completed-eirs/envision-san-jose-2040-supplemental-program>

[Exhibit C: Addendum to Program EIR for the Envision San José 2040 General Plan and Supplemental EIR to the Envision San José 2040 General Plan EIR Resolution](#)

[Exhibit D: General Plan Text Amendment Resolution](#)

[Correspondence Received After 10/7/20](#)

RE: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

Lisa Brancatelli <LBrancatelli@valleywater.org>

Tue 10/13/2020 2:23 PM

To: Keyon, David <david.keyon@sanjoseca.gov>

Cc: Colleen Haggerty <CHaggerty@valleywater.org>; Kirsten Struve <KStruve@valleywater.org>; Karen Koppett <KKoppett@valleywater.org>

[External Email]

Hello David,

Valley Water staff has reviewed the 2030 Greenhouse Gas Reduction Strategy (GHGRS) documents, dated and received by Valley Water on September 3, 2020. Valley Water has the following comments and recommended edits to be taken into consideration:

1. Page 38 of the EIR addendum - No levee construction work occurred as part of the preconstruction activities. Only the fill deliveries for Reach 1 construction started in May 2019. Please see the recommended edits to the last sentence of Section 3.10.1.2 to provide more clarity.
 - Proposed changes: **Reach 1** preconstruction work activities **on the levee** began in May 2019.
 - The following link will provide the most UpToDate Shoreline Phase I Study Project Updates: <https://www.valleywater.org/project-updates/creek-river-projects/san-francisco-bay-shoreline-protection>
2. Page 101 GHGRS Chapter 5 - Proposed revision: In conclusion, the City's long history of environmental leadership has allowed it to also demonstrate leadership in the relatively new focus area of GHG emissions reduction planning.
3. The EIR and GHGRS documents provide a water conservation target. Clarification should be provided to the water conservation target, its relationship to Valley Water programs, how it was established, and how it will be measured.
4. Please consider adding language to the water conservation policies and the Project Conformance Checklist to include the following:
 - Weather- or soil-based irrigation controllers;
 - Dedicated landscape meters;
 - The installation of dual plumbing to facilitate and maximize the use of alternative water sources for irrigation, toilet flushing, cooling towers, and other non-potable water uses.
 - Installation of separate submeters to each residential unit and individual spaces within commercial buildings to encourage efficient water use.

We appreciate the opportunity to review the documents and would like to review future documents as they become available. If you have any questions, you may reach me at (408) 691-1247, or by email at LBrancatelli@valleywater.org. Please reference Valley Water File No. 31811 on further correspondence regarding this project.

Thank you,
Lisa

LISA BRANCATELLI

ASSISTANT ENGINEER II (CIVIL)

Community Projects Review Unit

lbrancatelli@valleywater.org

Tel. (408) 630-2479 / Cell. (408) 691-1247

CPRU Hotline: (408) 630-2650

Santa Clara Valley Water District is now known as:



Clean Water • Healthy Environment • Flood Protection

5750 Almaden Expressway, San Jose CA 95118

www.valleywater.org

From: Raval, Meenaxi <meenaxi.raval@sanjoseca.gov>

Sent: Friday, September 25, 2020 4:29 PM

To: Lisa Brancatelli <LBrancatelli@valleywater.org>; Keyon, David <david.keyon@sanjoseca.gov>

Cc: Colleen Haggerty <CHaggerty@valleywater.org>

Subject: Re: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

Hello, The 2030 GHGRS has been analyzed with an Addendum to the General Plan EIR, as supplemented and amended. There is no formal comment period. Please connect with David in future emails. Thank you, Meenaxi

Meenaxi Raval, AICP

Supervisor- Environmental Planning

City of San Jose

200 East Santa Clara Street, 3rd Floor

San Jose, CA 95113-1905

From: Lisa Brancatelli <LBrancatelli@valleywater.org>
Sent: Friday, September 25, 2020 3:48 PM
To: Raval, Meenaxi <meenaxi.raval@sanjoseca.gov>
Cc: Colleen Haggerty <CHaggerty@valleywater.org>
Subject: FW: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

[External Email]

Hello Meenaxi,

We are seeking clarification on the comment due date for this document. We are assuming it is on or before October 14th, is this assumption correct?

Thank you and Have a nice weekend,
Lisa

LISA BRANCATELLI
ASSISTANT ENGINEER II (CIVIL)
Community Projects Review Unit
lbrancatelli@valleywater.org
Tel. (408) 630-2479 / Cell. (408) 691-1247
CPRU Hotline: (408) 630-2650

Santa Clara Valley Water District is now known as:



Clean Water • Healthy Environment • Flood Protection

5750 Almaden Expressway, San Jose CA 95118
www.valleywater.org

From: CPRU-Dropbox <CPRU@valleywater.org>
Sent: Thursday, September 24, 2020 7:53 AM
To: Lisa Brancatelli <LBrancatelli@valleywater.org>
Subject: FW: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

LISA BRANCATELLI

ASSISTANT ENGINEER II (CIVIL)
 Community Projects Review Unit
lbrancatelli@valleywater.org
 Tel. (408) 630-2479 / Cell. (408) 691-1247
 CPRU Hotline: (408) 630-2650

Santa Clara Valley Water District is now known as:



Clean Water • Healthy Environment • Flood Protection

5750 Almaden Expressway, San Jose CA 95118
www.valleywater.org

From: Raval, Meenaxi <meenaxi.raval@sanjoseca.gov>
Sent: Tuesday, September 15, 2020 11:05 AM
To: Keyon, David <david.keyon@sanjoseca.gov>; Manford, Robert <Robert.Manford@sanjoseca.gov>
Cc: The Office of Mayor Sam Liccardo <TheOfficeofMayorSamLiccardo@sanjoseca.gov>; District1 <district1@sanjoseca.gov>; District2 <District2@sanjoseca.gov>; District3 <district3@sanjoseca.gov>; District4 <District4@sanjoseca.gov>; District5 <District5@sanjoseca.gov>; District 6 <district6@sanjoseca.gov>; District7 <District7@sanjoseca.gov>; District8 <district8@sanjoseca.gov>; District9 <district9@sanjoseca.gov>; District 10 <District10@sanjoseca.gov>; Hughey, Rosalynn <Rosalynn.Hughey@sanjoseca.gov>; Le, Thai-Chau <Thai-Chau.Le@sanjoseca.gov>; Van Der Zweep, Cassandra <Cassandra.VanDerZweep@sanjoseca.gov>; Do, Sylvia <sylvia.do@sanjoseca.gov>; Rood, Timothy <timothy.rood@sanjoseca.gov>; Peak, Dana <Dana.Peak@sanjoseca.gov>; Planning Commission 3 <PlanningCom3@sanjoseca.gov>; Planning Commission 4 <PlanningCom4@sanjoseca.gov>; Planning Commission 7 <PlanningCom7@sanjoseca.gov>; Planning Commission 6 <PlanningCom6@sanjoseca.gov>; Planning Commission 1 <PlanningCom1@sanjoseca.gov>; Planning Commission 2 <PlanningCom2@sanjoseca.gov>; Planning Commission 5 <PlanningCom5@sanjoseca.gov>; plan.review <plan.review@vta.org>; Roads@CountyRoads.org; jbbroadbent@baaqmd.gov; wallyc@abag.ca.gov; kristin.garrison@wildlife.ca.gov; sfbaynwrc@fws.gov; mediaoffice@energy.state.ca.us; cepacomm@calepa.ca.gov; ombcomm@arb.ca.gov; hhiiken@baaqmd.gov; Ellen Talbo (dorothy.e.talbo@rda.sccgov.org) <dorothy.e.talbo@rda.sccgov.org>; ebugarin@bayareametro.gov; LDIGR-D4@dot.ca.gov; philip.crimmins@dot.ca.gov; Colleen Haggerty <CHaggerty@valleywater.org>; CPRU-Dropbox <CPRU@valleywater.org>; Aghegnehu, Ben <ben.aghegnehu@rda.sccgov.org>; pgeplanreview@pge.com; jfong@baaqmd.gov; Nate LeBlanc <nleblanc@sjdowntown.com>; mazavedo@sjdowntown.com; ada.marquez@sjsu.edu; scvas@scvas.org; Shani@scvas.org; Jbhlaw@pacbell.net; board@vendome.org; Sutherland, Kathy <kathysutherland@pacbell.net>; Knies, Scott <sknies@sjdowntown.com>; wtbrooks@brookshess.com; Erik Schoennauer <es@stanfordalumni.org>; 'info@calhistory.org' <info@calhistory.org>; mhophan@spur.org; conservation@lomaprieta.sierraclub.org; jeanann2@aol.com; lames@aol.com; infosj@spur.org;

ltolkoff@spur.org; abrownstevens@greenbelt.org; bschmidt@greenbelt.org;
clerk@openspaceauthority.org; talvarado@spur.org; advocacy@preservation.org;
andre@luthard.com; planning@cityofcampbell.com; City of Cupertino Planning Dept.
planning@cupertino.org; planinfo@fremont.gov; Ned Thomas (nthomas@ci.milpitas.ca.gov)
nthomas@ci.milpitas.ca.gov; plandiv.info@cityofpaloalto.org; planning@santaclaraca.gov;
RBrilliot@santaclaraca.gov; JDavidson@SantaClaraCA.gov; ACrabtree@SantaClaraCA.gov;
criordan@saratoga.ca.us; ABliziniski@sunnyvale.ca.gov; tryan@ci.sunnyvale.ca.us; Connolly,
Mark <mark.connolly@pln.sccgov.org>; Rob Eastwood <rob.eastwood@pln.sccgov.org>;
paulk@cityofcampbell.com; planning@losgatosca.gov; planning@morganhill.ca.gov;
Terry.Linder@morganhill.ca.gov; community.development@mountainview.gov; Michael Fossati
(mfossati@ci.milpitas.ca.gov) <mfossati@ci.milpitas.ca.gov>; Provenzano, Jeffrey
<Jeffrey.Provenzano@sanjoseca.gov>; Harvie, Nicole <Nicole.Harvie@sanjoseca.gov>; Jake
Walsh <jake.walsh@sjwater.com>; Tuttle, Bill <bill.tuttle@sjwater.com>
Subject: Re: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

NOTICE OF CHANGE OF HEARING DATES 2030 GREENHOUSE GAS REDUCTION STRATEGY INITIAL STUDY/ADDENDUM

Updated Hearing Dates

Planning Commission Hearing: October 14, 2020

City Council: November 7, 2020

The City of San José has prepared an updated Greenhouse Gas Reduction Strategy in response to Senate Bill 32 that established an interim statewide GHG reduction goal for 2030 to meet the long-term target of carbon neutrality by 2045 [Executive Order B-55-18].

The 2030 GHGRS provides a set of strategies and additional actions that will allow the City to achieve its 2030 target by leveraging the City's existing planning efforts and its supporting policy and program frameworks. The 2030 Greenhouse Gas Reduction Strategy [2030 GHGRS] is available here:

<https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/greenhouse-gas-reduction-strategy>

The Development Compliance Checklist serves to apply the relevant General Plan and 2030 GHGRS policies through a streamlined review process for proposed new development projects subject to discretionary review and that trigger environmental review under the California Environmental Quality Act (CEQA).

The Environmental Review under CEQA and the plan documents are also available online at the City of San José's "Active EIRs" website at:

<https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/2030-ghgrs-addendum/-fsiteid-1>

**Thank you,
Meenaxi**

Meenaxi Raval, AICP

Supervisor- Environmental Planning

City of San Jose

200 East Santa Clara Street, 3rd Floor

San Jose, CA 95113-1905

From: Raval, Meenaxi

Sent: Thursday, September 3, 2020 5:44 PM

To: Raval, Meenaxi <meenaxi.raval@sanjoseca.gov>; Keyon, David

<david.keyon@sanjoseca.gov>; Manford, Robert <Robert.Manford@sanjoseca.gov>

Cc: The Office of Mayor Sam Liccardo <TheOfficeofMayorSamLiccardo@sanjoseca.gov>; District1

<district1@sanjoseca.gov>; District2 <District2@sanjoseca.gov>; District3

<district3@sanjoseca.gov>; District4 <District4@sanjoseca.gov>; District5

<District5@sanjoseca.gov>; District 6 <district6@sanjoseca.gov>; District7

<District7@sanjoseca.gov>; District8 <district8@sanjoseca.gov>; District9

<district9@sanjoseca.gov>; District 10 <District10@sanjoseca.gov>; Hughey, Rosalynn

<Rosalynn.Hughey@sanjoseca.gov>; Manford, Robert <Robert.Manford@sanjoseca.gov>; Keyon,

David <david.keyon@sanjoseca.gov>; Le, Thai-Chau <Thai-Chau.Le@sanjoseca.gov>; Van Der

Zweep, Cassandra <Cassandra.VanDerZweep@sanjoseca.gov>; Raval, Meenaxi

<meenaxi.raval@sanjoseca.gov>; Do, Sylvia <sylvia.do@sanjoseca.gov>; Rood, Timothy

<timothy.rood@sanjoseca.gov>; Peak, Dana <Dana.Peak@sanjoseca.gov>; Planning Commission

3 <PlanningCom3@sanjoseca.gov>; Planning Commission 4 <PlanningCom4@sanjoseca.gov>;

Planning Commission 7 <PlanningCom7@sanjoseca.gov>; Planning Commission 6

<PlanningCom6@sanjoseca.gov>; Planning Commission 1 <PlanningCom1@sanjoseca.gov>;

Planning Commission 2 <PlanningCom2@sanjoseca.gov>; Planning Commission 5

<PlanningCom5@sanjoseca.gov>; plan.review <plan.review@vta.org>; Roads@CountyRoads.org

<Roads@CountyRoads.org>; jbroadbent@baaqmd.gov <jbroadbent@baaqmd.gov>;

wallyc@abag.ca.gov <wallyc@abag.ca.gov>; kristin.garrison@wildlife.ca.gov

kristin.garrison@wildlife.ca.gov; sfbaynwrc@fws.gov <sfbaynwrc@fws.gov>;
mediaoffice@energy.state.ca.us <mediaoffice@energy.state.ca.us>; cepacomm@calepa.ca.gov
 <cepacomm@calepa.ca.gov>; ombcomm@arb.ca.gov <ombcomm@arb.ca.gov>;
hhilken@baaqmd.gov <hhilken@baaqmd.gov>; Ellen Talbo (dorothy.e.talbo@rda.sccgov.org)
 <dorothy.e.talbo@rda.sccgov.org>; ebugarin@bayareametro.gov <ebugarin@bayareametro.gov>;
LDIGR-D4@dot.ca.gov <LDIGR-D4@dot.ca.gov>; philip.crimmins@dot.ca.gov
 <philip.crimmins@dot.ca.gov>; chaggerty@valleywater.org <chaggerty@valleywater.org>; CPRU-
 Dropbox <cpru@valleywater.org>; Aghegnehu, Ben <ben.aghegnehu@rda.sccgov.org>;
pgeplanreview@pge.com <pgeplanreview@pge.com>; jfong@baaqmd.gov <jfong@baaqmd.gov>;
 Nate LeBlanc <nleblanc@sjdowntown.com>; mazavedo@sjdowntown.com
 <mazavedo@sjdowntown.com>; ada.marquez@sjsu.edu <ada.marquez@sjsu.edu>;
scvas@scvas.org <scvas@scvas.org>; Shani@scvas.org <Shani@scvas.org>;
Jbhlaw@pacbell.net <Jbhlaw@pacbell.net>; board@vendome.org <board@vendome.org>;
 Sutherland, Kathy <kathysutherland@pacbell.net>; Knies, Scott <sknies@sjdowntown.com>;
wtbrooks@brookshess.com <wtbrooks@brookshess.com>; Erik Schoennauer
 <es@stanfordalumni.org>; 'info@calhistory.org' <info@calhistory.org>; mhophan@spur.org
 <mhophan@spur.org>; conservation@lomapieta.sierraclub.org
 <conservation@lomapieta.sierraclub.org>; jeanann2@aol.com <jeanann2@aol.com>;
lames@aol.com <lames@aol.com>; infosj@spur.org <infosj@spur.org>; ltolkoff@spur.org
 <ltolkoff@spur.org>; abrownstevens@greenbelt.org <abrownstevens@greenbelt.org>;
bschmidt@greenbelt.org <bschmidt@greenbelt.org>; clerk@openspaceauthority.org
 <clerk@openspaceauthority.org>; talvarado@spur.org <talvarado@spur.org>;
advocacy@preservation.org <advocacy@preservation.org>; andre@luthard.com
 <andre@luthard.com>; planning@cityofcampbell.com <planning@cityofcampbell.com>; City of
 Cupertino Planning Dept. <planning@cupertino.org>; planinfo@fremont.gov
 <planinfo@fremont.gov>; Ned Thomas (nthomas@ci.milpitas.ca.gov)
 <nthomas@ci.milpitas.ca.gov>; plandiv.info@cityofpaloalto.org <plandiv.info@cityofpaloalto.org>;
planning@santaclaraca.gov <planning@santaclaraca.gov>; RBrilliot@santaclaraca.gov
 <RBrilliot@santaclaraca.gov>; JDavidson@SantaClaraCA.gov <JDavidson@SantaClaraCA.gov>;
ACrabtree@SantaClaraCA.gov <ACrabtree@SantaClaraCA.gov>; criordan@saratoga.ca.us
 <criordan@saratoga.ca.us>; ABlizinski@sunnyvale.ca.gov <ABlizinski@sunnyvale.ca.gov>;
tryan@ci.sunnyvale.ca.us <tryan@ci.sunnyvale.ca.us>; Connolly, Mark
 <mark.connolly@pln.sccgov.org>; Rob Eastwood <rob.eastwood@pln.sccgov.org>;
paulk@cityofcampbell.com <paulk@cityofcampbell.com>; planning@losgatosca.gov
 <planning@losgatosca.gov>; planning@morganhill.ca.gov <planning@morganhill.ca.gov>;
Terry.Linder@morganhill.ca.gov <Terry.Linder@morganhill.ca.gov>;
community.development@mountainview.gov <community.development@mountainview.gov>;
 Michael Fossati (mfossati@ci.milpitas.ca.gov) <mfossati@ci.milpitas.ca.gov>; Provenzano, Jeffrey
 <Jeffrey.Provenzano@sanjoseca.gov>; Harvie, Nicole <Nicole.Harvie@sanjoseca.gov>; Jake
 Walsh <jake.walsh@sjwater.com>; Tuttle, Bill <bill.tuttle@sjwater.com>
Subject: San Jose's 2030 Greenhouse Gas Reduction Strategy & CEQA

2030 Greenhouse Gas Reduction Strategy [2030 GHGRS]

The City of San José has prepared an updated Greenhouse Gas Reduction Strategy in response to Senate Bill 32 that established an interim statewide GHG reduction goal for 2030 to meet the long-term target of carbon neutrality by 2045 [Executive Order B-55-18]. The 2030 GHGRS provides a set of strategies and additional actions that will allow the City

to achieve its 2030 target by leveraging the City's existing planning efforts and its supporting policy and program frameworks. The 2030 Greenhouse Gas Reduction Strategy [2030 GHGRS] is available here:

<https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/greenhouse-gas-reduction-strategy>

The Development Compliance Checklist serves to apply the relevant General Plan and 2030 GHGRS policies through a streamlined review process for proposed new development projects subject to discretionary review and that trigger environmental review under the California Environmental Quality Act (CEQA).

The Environmental Review under CEQA and the plan documents are also available online at the City of San José's "Active EIRs" website at:

<https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/2030-ghgrs-addendum/-fsiteid-1>

Planning Commission Hearing: September 23, 2020
City Council: October 20, 2020

Thank you,
Meenaxi

Meenaxi Raval, AICP

Supervisor- Environmental Planning

City of San Jose

200 East Santa Clara Street, 3rd Floor

San Jose, CA 95113-1905

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From: Josephine Fong <jfong@baaqmd.gov>
Sent: Wednesday, October 14, 2020 9:07 AM
To: Raval, Meenaxi <meenaxi.raval@sanjoseca.gov>
Cc: PlanningSupportStaff <PlanningSupportStaff@sanjoseca.gov>; Keyon, David <david.keyon@sanjoseca.gov>; Jakub Zielkiewicz <jzielkiewicz@baaqmd.gov>; Abby Young <ayoung@baaqmd.gov>; Yvette DiCarlo <ydicarlo@baaqmd.gov>; Wendy Goodfriend <wgoodfriend@baaqmd.gov>; Henry Hilken <HHilken@baaqmd.gov>
Subject: Comment Letter for San Jose's 2030 Greenhouse Gas Reduction Strategy

[External Email]

Hi Meenaxi,

Attached is the Air District's comment letter for consideration at the October 14, 2020 Planning Commission meeting. Please let us know if you have any questions regarding our comments on the City's 2030 Greenhouse Gas Reduction Strategy.

Thank you,
Josephine

Josephine Fong
Bay Area Air Quality Management District





**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

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John J. Bauters
Pauline Russo Cutter
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EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



October 14, 2020

Meenaxi Raval
Department of Planning, Building and Code Enforcement
City of San Jose
200 East Santa Clara Street, 3rd Floor Tower
San Jose, CA 95113-1905

RE: San Jose 2030 Greenhouse Gas Reduction Strategy

Dear Ms. Raval,

Bay Area Air Quality Management District (Air District) staff has reviewed the City of San Jose's 2030 Greenhouse Gas Reduction Strategy (Strategy) and the Initial Study/Addendum to the Envision San Jose 2040 General Plan EIR and the General Plan Supplemental EIR. The City's update to the original Strategy reflects the plans, policies, and codes adopted to reduce emissions levels to 40 percent below 1990 levels by 2030 per Senate Bill (SB) 32. As the City intends to use the updated Strategy as a Qualified Climate Action Plan to tier and streamline CEQA review for projects consistent with the Strategy, the City has also prepared a Development Compliance Checklist.

Air District staff commends the City for updating the Strategy to reflect the State's SB 32 greenhouse gas (GHG) reduction goals for 2030. Given the urgency to address the climate crisis, the Air District also urges the City to look beyond 2030 and align the Strategy with Executive Order (EO) B-55-19 to achieve carbon neutrality as soon as possible and no later than 2045. Air District staff offers the following comments both in support of and to strengthen the Strategy:

- The Strategy includes measures addressing GHG emissions from buildings, waste, and other sectors. However, Appendix C of the Strategy refers to other City plans for much of the supporting quantitative analysis for the GHG emission reduction estimates associated with the measures. The inability to access full quantitative analysis within the Strategy documents makes it difficult to judge whether the measures included in the Strategy will achieve the Strategy's target or not, thus weakening the Strategy's ability to support tiering under CEQA. Staff recommends the Strategy include either a full quantitative analysis justifying the emission reduction estimates for each GHG reduction measure, or a hyperlink or specific page reference to where the analysis can be found in other City plans and documents.

- Air District staff strongly urges the City to include specific measures for data centers in Chapters 3.4 and 4.1 of the Strategy. These measures could include eliminating the use of diesel back-up generators, achieving an industry best practice Power Usage Effectiveness (PUE) no greater than 1.1, use of low-GWP refrigerants, and commitment to serving baseload power with zero-emitting resources. Such measures could be incorporated into the existing discussion around building electrification (GHGRS #2), building retrofits (GHGRS #4), and San Jose Clean Energy providing carbon-free power (GHGRS #1).
- The Air District supports the inclusion of important mandatory measures, such as an energy efficient reach code and natural gas prohibition for new construction. The Air District also recognizes that many of the measures included in the Strategy are not bound by timeframes or are framed as voluntary. For example, GHGRS #4 includes a 3 percent reduction citywide in natural gas use below 2017 levels, but it's unclear when this reduction will occur. Likewise, GHGRS #4 mentions that the "city can also consider support for residents" to replace fossil fuel back-up generators; this measure should be strengthened by including language to mandate this action. The Air District has found that mandatory measures are often more effective at achieving the expected emissions reductions than voluntary measures. The Air District recommends the Strategy includes stronger language that affirms the City's desire that voluntary measures be implemented.

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 reducing GHG emissions. By addressing the comments in this letter, Air District staff believes that the City's GHG Reduction Strategy would be more likely to achieve the 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 Jakub Zielkiewicz, Advanced Projects Advisor, at (415) 749-8429 or jzielkiewicz@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 Margaret Abe-Koga
BAAQMD Vice Chair Cindy Chavez
BAAQMD Director Liz Kniss
BAAQMD Chair Rod G. Sinks