



Memo

To: Sigalle Michael, Sustainability Coordinator, and Andrea Pappajohn, Sustainability and Climate Management Fellow, City of Burlingame

From: Chris Dugan and Phillip Gleason

CC: --

Date: August 8, 2019

SUBJECT: Response to Public Comments Received on the City of Burlingame 2030 Climate Action Plan (CAP) Update and Addendum to the City of Burlingame 2040 General Plan Environmental Impact Report (EIR)

This memorandum addresses the comments received on the the City of Burlingame's (City) Draft 2030 CAP Update and Addendum to the City's 2040 General Plan EIR. This memorandum includes the following attachments:

- Attachment 1: Responses to Comments on the Draft 2030 CAP Update
- Attachment 2: Revised Public Draft 2030 CAP Update with Text Changes in ~~Strikethrough~~ and Underline

1. 2030 CAP Update

As a community committed to protecting the environment, Burlingame prepared its first CAP in 2009 to address greenhouse gas (GHG) emissions in the city through the year 2020. Over the last decade, Burlingame has implemented multiple programs and efforts that significantly reduced GHG emissions from City operations and the community and brought other benefits to Burlingame.

In 2015, the City commenced a three-year endeavor that updated the community's vision for the future and set forth policies to implement this vision. These policies constitute the Burlingame 2040 General Plan, also known as Envision Burlingame. On January 7, 2019, the Burlingame City Council certified an EIR (State Clearinghouse Number 2017082018) for the 2040 General Plan, and adopted the 2040 General Plan (Burlingame, 2019a). An underlying theme of the Envision Burlingame General Plan is sustainability through smart growth, resource conservation, green design, urban forest protection, pedestrian and bicycle accessibility, and transit oriented development. The General Plan contains numerous policies and measures that will reduce GHG emissions by conserving resources, promoting alternative transportation, and reducing waste.

The City completed its Draft 2030 CAP Update in April 2019. The 2030 CAP Update compiles all the climate action related goals and policies contained in the 2040 General Plan into a single, comprehensive document for addressing GHG emissions in the city. The 2030 CAP Update also addresses Goal HP-2 of the 2040 General Plan (achieve GHG emissions consistent with State goals) and is one of the specific implementation programs identified in the General Plan (IP-52: Climate Action Plan). The Draft 2030 CAP Update provides new estimates of existing GHG emissions within the city; forecasts future GHG emissions for 2020, 2030, 2040, and 2050; and identifies GHG emission reductions resulting from State legislation and GHG Emission Reduction Measures contained in the CAP. Nearly all the GHG Emission Reduction Measures identified in the 2030 CAP Update are directly tied to the City's General Plan policies; however,

the 2030 CAP Update modifies and adds several policies to the General Plan, requiring an amendment to the General Plan.

2030 CAP Update Public Review Processes

The City provided the following opportunities for public review of the Draft 2030 CAP Update:

- The Draft 2030 CAP Update was made available for public review through the City's Climate Action Plan website beginning on April 24, 2019.¹
- The Draft 2030 CAP Update was presented at the Annual Joint Meeting of the City Council and Planning Commission on April 27, 2019.
- The Draft 2030 CAP Update was presented to the City's Citizens Environmental Council on May 8, 2019.
- The Draft 2030 CAP Update was provided to staff of the Bay Area Air Quality Management District's (BAAQMD) Planning and Climate Protection Division on June 4, 2019.
- A Notice of Availability (NOA) of an Addendum to the 2040 General Plan EIR, requesting comments on the 2030 CAP Update, associated General Plan amendments, and Addendum to the 2040 General Plan EIR from any agencies, persons, or organizations concerned with the environmental effects of the 2030 CAP Update and associated General Plan amendments was released on June 19, 2019. This noticing effort involved:
 - Posting the NOA at the City Planning Department and Libraries
 - Email notification through the Envision Burlingame Website
 - A 15-day public comment period (concluding on July 3, 2019)

The City received eight comment letters/transmittals during the review period on the Draft 2030 CAP Update's emissions inventories, GHG Emission Reduction Measures, and other information, including two letters from a regional agency (the BAAQMD), five letters/transmittals from a community group (Citizens Environmental Council of Burlingame), and one letter from a member of the public. In addition, the City received and responded to oral comments from members of the public at the April 27 and May 8, 2019 public meetings at which the 2030 CAP Update was discussed. Each written comment/transmittal was assigned a letter (i.e., "A", "B", etc.) and each specific comment was assigned an alpha-numeric identification number, as summarized in the Table below.

Summary of Written Public Comments Received on the Draft 2030 CAP Update		
ID	Commenter (Affiliation)	Comments
A	Steven Cady (Citizens Environmental Council of Burlingame (CEC))	A-1
B	Ash McNeeley (CEC)	B-1 and B-2
C	Mike Dunham (CEC)	C1
D	Former Mayor Terry Nagel (CEC)	D1 and D2
E	Christine Yballa (Interested Individual)	E1 to E8
F	Michael McCord (CEC)	F1 to F12
G	Jakub Zielkiewicz (Bay Area Air Quality Management District (BAAQMD))	G1 to G27
H	Jakub Zielkiewicz (BAAQMD)	H1

¹ https://www.burlingame.org/departments/sustainability/climate_change.php

The comments received on the Draft 2030 CAP Update addressed topics ranging from clarifying text edits, to suggestions for specific GHG emission reduction strategies, to requests and recommendations for more aggressive timing and implementation procedures for the CAP Update. The City has reviewed the comments received on the Draft CAP Update and revised the 2030 CAP Update, where necessary, to reflect public comments. The changes incorporated into the 2030 CAP Update add clarity and specificity to the 2030 CAP Update, but do not result in substantial changes to emissions inventories, GHG emission reduction targets, GHG Emission Reduction Measures, or GHG emission reductions.

Attachment 1 includes the public comments received on the 2030 CAP Update and the City's responses to these comments.

Attachment 2 provides amended text and graphics for the 2030 CAP Update. Additions to the 2030 CAP Update text are shown in underline and text removed from the 2030 CAP Update is shown with ~~strikethrough~~.

2. Addendum to the 2040 General Plan EIR

In 2018, the City prepared a Draft and a Final EIR (collectively, EIR; State Clearinghouse Number 2017082018) that evaluated the potential environmental impacts associated with the potential growth that may occur with implementation of the 2040 General Plan. The 2040 General Plan EIR identified significant environmental effects in the following areas, even with the incorporation of mitigation measures intended to avoid and/or substantially reduce potential impacts associated with General Plan implementation: Greenhouse Gas Emissions, Paleontological Resources, Noise, and Transportation and Circulation. As noted in Section 1, the City Council certified the EIR for the 2040 General Plan and adopted the 2040 General Plan on January 7, 2019.

The Draft 2030 CAP Update and associated General Plan amendments constitute a project under the California Environmental Quality Act (CEQA). Although nearly all of the GHG Emission Reduction Measures identified in the Draft 2030 CAP Update are directly tied to the City's 2040 General Plan policies, the 2030 CAP Update proposes the modification and addition of several policies to the General Plan, including:

- GHG Emission Reduction Measure 9, Electrification of Yard and Garden Equipment, would add a new policy to the General Plan, Policy HP-2.16: Electrification of Yard and Garden Equipment, that would support the transition of lawn and garden equipment from combustion fuels to electric power.
- GHG Emission Reduction Measure 10, Construction Best Management Practices, would amend existing General Plan Policy HP-3.12: Construction Best Management Practices to support the transition of certain construction equipment from combustion fuels to electric power.
- GHG Emission Reduction Measure 15, Alternatively-Powered Residential Water Heaters, would add a new policy to the General Plan, Policy HP-2.17: Alternatively-Powered Residential Water Heaters, to support the transition from tank-based, natural gas water heaters to solar, electrically-powered, or natural gas tankless water heaters in residential development.
- GHG Emission Reduction Measure 20, Increase the Public Tree Population, would amend existing General Plan Policy CC-2.2: Increase the Public Street Tree Population to support planting of trees in other public areas besides streets.

Pursuant to CEQA Guidelines §15162(a), the City has reviewed the 2030 CAP Update, associated General Plan amendments, and the certified EIR for the 2040 General Plan EIR to determine:

- 1) The extent to which potential project impacts have been addressed by the previously certified EIR for the 2040 General Plan EIR;
- 2) Whether project changes create new significant or more severe project impacts;
- 3) Whether new circumstances or new information create new significant or more severe impacts or require new analysis; and
- 4) Whether any identified new significant or more severe impacts are adequately addressed by previously approved project mitigation.

The proposed 2030 CAP Update and General Plan amendments have been designed with the expressed purpose of reducing environmental effects. The City determined that the proposed 2030 CAP Update and associated General Plan amendments would result in similar or lower magnitude environmental impacts than identified in the certified 2040 General Plan EIR. The City, therefore, determined that an EIR addendum should be prepared as the appropriate CEQA document to address project revisions in accordance with CEQA Guidelines Section 15164. The CEQA Findings of Fact and Statement of Overriding Considerations adopted by the City Council in January 2019 still apply to the project.

Addendum to the 2040 General Plan EIR Public Review Process

CEQA Guidelines §15164(c) provides that an Addendum need not be circulated for public review but can be included in or attached to a final EIR or adopted negative declaration. Nonetheless, as described in Section 1, the City provided a 15-day public review period for interested individuals and public agencies to submit comments on the Draft 2030 CAP Update, associated General Plan amendments, and Addendum to the General Plan EIR from June 19, 2019 to July 3, 2019. The City did not receive any comments on the Addendum, and none of the changes made to the Draft 2030 CAP Update summarized above and presented in Attachments 1 or 2 change the information, analyses, or conclusions contained in the Addendum. Therefore, there are no changes to the Addendum to the 2040 General Plan EIR required.

Attachment 1

Responses to Comments on the 2030 Draft CAP Update

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City of Burlingame
Citizen's Environmental Council

Draft Climate Action Plan (CAP) Presentation
May 8, 2019 Public Comment Card

Comment
Letter
"A"

STEVE CADY
NAME

ADDRESS (Optional)

CEC
ORGANIZATION /AFFILIATION

E-MAIL ADDRESS (Optional)

Comment: LOOK AT BIKE TRAVEL AS IT EXISTS AND
IMPROVE BIKEWAYS. FOR EXAMPLE - BURNAL IS USED
DAILY BY KIDS GOING TO BIS. ^(BIKING) THERE SHOULD BE
A 4-WAY STOP AT HILLSIDE TO FACILITATE AND
MAKE SAFER THIS CROSSING, WHICH SHOULD
INCREASE BIKE AND PEDESTRIAN USE. (Continue on back if necessary)
Thank You

A-1

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Response to Comments from Steven Cady, Vice Chair, Citizens Environmental Council

Comment A-1: Mr. Cady recommends the City examine and improve existing bicycle paths of travel in the City and provides a specific recommendation for improving the intersection of Bernal Avenue and Hillside Drive.

Response to Comment A-1: The 2030 CAP Update incorporates several strategies to reduce automobile vehicle miles travelled (VMT) and increase alternative modes of transportation such as bicycle travel, including, but not limited to GHG Emission Reduction Measure 2 (Transportation Demand Management), GHG Emission Reduction Measure 3 (Complete Streets), and GHG Emission Reduction Measure 5 (Electric Vehicle, Bicycle, and Scooter Sharing). GHG Emission Reduction Measure 3 specifically requires the City to develop and implement a Bicycle and Pedestrian Master Plan by 2025 that includes detailed information on the existing transportation network and identifies multi-modal infrastructure improvements, including expanded safe bicycle routes, that reduce VMT, and increase pedestrian and bicycle use, safety, comfort, and accessibility. The feasibility and suitability of specific multi-modal infrastructure improvements would be considered during the development and implementation of the City's Bicycle and Pedestrian Master Plan. No changes to the 2030 CAP Update are required at this time.

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City of Burlingame
Citizen's Environmental Council

Comment
Letter
"B"

Draft Climate Action Plan (CAP) Presentation
May 8, 2019 Public Comment Card

Ash McNeely
NAME

1236 Paloma Ave
ADDRESS (Optional)
Burlingame

ORGANIZATION /AFFILIATION

E-MAIL ADDRESS (Optional)

Comment:

B-1

1) Why are ^{our} school districts not included in the CAP?

Schools are an important forum for educating the next generation ! This makes no sense to me. * (over)

B-2

2) Can the City provide faster permitting for projects that go 100% electric? (Continue on back if necessary)
Or rebate fees as an incentive?

Thank You

B-1
con't.

* The SM County Office of Education has an environmental literacy coordinator who is helping districts adopt all sorts of sustainability practices. Her name is Andra Yeghonian. I'd recommend connecting with her.

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Response to Comments from Ash McNeely, Member, Citizens Environmental Council

Comment B-1: Ms. McNeely questions why school districts are not included in the 2030 CAP Update and suggests the City contact the San Mateo County Office of Education for potential sustainability practices that could be implemented by school districts.

Response to Comment B-1: The 2030 CAP Update is a comprehensive roadmap that outlines the activities the City will take to reduce GHG emissions and address climate change. To clarify, the emissions associated with the operation of existing schools within Burlingame (e.g., resident trips to and from schools, natural gas and electricity consumption at a school site, etc.) are part of the 2030 CAP Update's baseline, business-as-usual (BAU), adjusted BAU, and GHG Reduction Strategy emissions estimates. The 2030 CAP Update; however, does not separately track school-related emissions because it is not possible to do so at this time.

Although the 2030 CAP Update does not include specific GHG Emission Reduction Measures pertaining to school operations, page 55 of the 2030 CAP Update does include a list of other GHG Emission Reduction Measures included in the General Plan that provide GHG emission benefits, including measures pertaining to school gardens (HP-1.13) and public education and outreach (CC-1.12). These measures would be implemented through the General Plan, and the City may coordinate with local schools, school districts, and the County's Office of Education during implementation of the 2030 CAP Update and Envision Burlingame General Plan. In addition, the City has revised Chapter 6 of the 2030 CAP Update to indicate the City's Sustainability Coordinator would work with the Burlingame School District to inform students of the City's goals for addressing climate change and the importance of sustainable practices.

Comment B-2: Ms. McNeely asks if the City can provide a faster permit processing time or financial incentives to projects that go 100% electric.

Response to Comment B-2: In general, the City processes permit applications according to set procedures that include schedules and timelines for determining application completeness, processing, etc. The 2030 CAP Update, at this time, does not propose to adjust permit processing procedures or provide lower permit processing fees (because such fees are intended to cover administrative staff time that would occur even if a project is LEED certified or 100% electric, etc.). As described on page 63 of the 2030 CAP Update, the City has prepared the CAP Update to satisfy all of the qualifications set forth in California Environmental Quality Act (CEQA) Guidelines Section 15183.5, which may allow projects that are consistent with or which exceed the measures and requirements contained in the CAP to be eligible for a streamlined environmental review. Such reviews typically proceed faster and require lower costs to complete.

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City of Burlingame
Citizen's Environmental Council

Draft Climate Action Plan (CAP) Presentation
May 8, 2019 Public Comment Card

Comment
Letter
"C"

Mike Dunham

NAME

ADDRESS (Optional)

CEC

ORGANIZATION /AFFILIATION

E-MAIL ADDRESS (Optional)

Comment: Given that the CAP doesn't capture GHG emissions emitted outside Burlingame from things like food^{production}, goods, building materials, etc., the city should set more aggressive GHG reduction goals/larger than the state requires. This would suggest →
(Continue on back if necessary)

C-1 further GHG reduction strategies, like requiring that the city pass a stricter reach code about eliminating natural gas infrastructure in new residential construction. This is to say nothing of the 2018 IPCC report suggesting we need to be at net-zero GHG emissions by 2050, which the CAP does not currently aim for.

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Response to Comments from Mike Dunham, Member, Citizens Environmental Council

Comment C-1: Mr. Dunham comments the 2030 CAP Update does not capture GHG emissions from “upstream” activities such as food and material productions and, therefore, should set more aggressive GHG emission reduction targets and strategies, such as reach codes that eliminate natural gas from new residential construction or net-zero GHG emissions targets.

Response to Comment C-1: Mr. Dunham is correct the 2030 CAP Update does not include GHG emissions from upstream activities associated with food and material production.¹ Rather, the 2030 CAP Update uses a sector- or production-based GHG emissions quantification methodology to estimate existing and future GHG emissions from sources and activities that are, in general, located within the City’s boundaries. This approach is consistent with the City’s previous (2009) CAP efforts, the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (Version 1.1), and, in general, the State’s GHG emissions reporting protocols used to track progress towards meeting State annual GHG emission reduction goals. The production-based approach allows for consistent tracking and comparison to State GHG emission reduction goals. The 2030 CAP Update does include certain voluntary reach code provisions (e.g., see GHG Emission Reduction Measure 6, Electric Vehicle Infrastructure and Initiatives, GHG Emission Reduction Measure 11, Green Building Practices and Standards, and GHG Emission Reduction Measure 12, Energy Efficiency) that may, depending on the specific project being evaluated, apply to new and/or modified development projects. The 2030 CAP Update did not apply a net-zero GHG emission target, because the 2030 CAP Update is intended to reduce GHG emissions from both new and existing GHG emission-generating sources and activities within the City, and a net-zero GHG emission threshold was not considered feasible for the City given its specific demographics and GHG emissions profile.

¹ The inclusion of upstream GHG emissions sources is usually referred to as a consumption-based methodology. A consumption-based emissions inventory is based on a full life-cycle analysis of the emissions generated by the production, shipping, use, and disposal of each product consumed in an area, regardless of where the GHG emissions associated with production, shipping, etc. were released to the atmosphere. Since consumption-based inventories capture upstream emissions generating activities, they typically result in higher GHG emissions levels or estimates.

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Comment Letter "D"

[REDACTED]

On May 24, 2019, at 3:27 PM, Terry Nagel [REDACTED] wrote:

Hi Andrea and Syed--

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] thought I would share some minor questions and a few typos I saw while reading the Climate Action Report. CEC is going to submit a group memo summarizing some suggestions for the CAP. The following is just from me.

Typos

ES-2 – 1st paragraph third from last line – change “its businesses are shown on below” to “its businesses are shown below”

Page 21 – 8th line – change “made-up” to “made up”

Page 31 – last paragraph, 2nd line – change “of City’s CAP” to “of the City’s CAP”

Page 60 – 1st paragraph, 3rd line – change “for seal level rise” to “for sea level rise”

Page 65 – Close up space between 1st two lines

Questions (when you have time)

Page ES-3 - I'm curious as to what percent of streetlights have been replaced with LEDs and what percent of homes have been installed solar power.

Page 7 - Methane is mentioned. Is there anything we can do to channel the methane from the City's landfill to a positive use?

Page 21 - Shouldn't we have a goal of electrifying all City vehicles and incentives for disposal of old refrigerators?

Page 59 - Paragraph 2 says, “Much of the City’s aging storm drain system has a ten-year design storm capacity, not the standard 30-year capacity for regional facilities.” We are currently overhauling all our water systems, and I'm wondering why the new storm drain system isn't being built for 30-year capacity.

Thanks very much,

Terry

Terry Nagel
[REDACTED]

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Response to Comments from Former Mayor Terry Nagel, Member, Citizens Environmental Council

Comment D-1: Former Mayor Nagel identifies several typographical errors in the Draft 2030 CAP Update.

Response to Comment D-1: Comment noted. The identified errors have been corrected in the 2030 CAP Update (see Attachment 2).

Comment D-2: Former Mayor Nagel asks several questions regarding specific information in the Draft 2030 CAP Update.

Response to Comment D-2: In response to Ms. Nagel's questions:

- Street lights: Within the City, PG&E maintains 849 street lights on wooden poles and the City's Public Works Department maintains 2,035 streetlights on metal poles. The 1,677 street lights replaced by the City over the past several years represents approximately 82% of the City's street lights.
- Residential solar power: The 300 homes that have installed solar power over the past several years represents approximately XYZ% of the City's residential housing stock as of 2015.
- Methane: The Burlingame landfill, located at 1001 Airport Boulevard, was in operation from 1957 to 1987. The site accepted only inorganic construction debris, concrete rubble, wood, plastic, garden refuse, metal, and clean soil; no household garbage or hazardous waste was accepted. Although the site is now capped and built upon, methane emissions are still collected via a landfill gas collection system and combusted to prevent the release of methane to the atmosphere.
- Electrification of city vehicles: The City's vehicle fleet encompasses a variety of vehicle types intended for different uses (e.g., passenger cars, emergency vehicles, other types of vehicles) and a one-sized fits all approach to fleet electrification is not considered feasible at this time. The City is committed to evaluating the specific characteristics of its vehicle fleet and evaluating the feasibility of acquiring electric vehicles in the future. The City has revised GHG Emission Reduction Measure 6 to include a specific evaluation and study of the hurdles and opportunities for converting the City's fleet to electric vehicles as part of the development of its Electric Vehicle Strategic Plan (see Attachment 2).
- Disposal of old refrigerators: The energy and cooling efficiency of refrigerators is established by the California Energy Commission. GHG Emission Reduction Measure 12 encourages energy efficiency improvements in the City's existing building stock. The City could provide financial incentives to upgrade appliances as part of this measure if a funding source became available for such incentives.
- Storm drain systems: The sentence referred to on page 59 of the Draft 2030 CAP Update refers to the City's existing stormwater system. According to the Public Works Department, the storm drain upgrades planned for in the City are designed to meet current standards, which provide capacity for the 30-year design storm event.


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From: [Christine](#)
Sent: Friday, June 7, 2019 6:04 PM
To: apappajohn@burlingame.org
Subject: CAP comments

Comment
Letter
"E"

Hello Andrea,

I came to the May CEC Meeting and heard the CAP introduction from the consultant. I attached some of my thoughts on the CAP and also included a flyer from Kaiser that I saw a while ago that I thought was interesting. Maybe something like this could be designed by the city? You sure have your work cut out for you! This is a big job! As I mentioned in my comments, I believe it is important to get the community together on these issues. I would be willing to volunteer a bit in these efforts. I have very little expertise in this area but am willing to help out for the cause!

Sincerely,
Christine Yballa


Sent from [Mail](#) for Windows 10

12 tips for healthy people and planet

Healthy people need healthy communities, which is why we're celebrating things we can do — big and small — to take care of both the planet and our health. Try some of these tips for your own well-being and for a cleaner, healthier environment.

Act on climate change



PLUG IN: Hybrid and electric cars can reduce fossil fuel consumption and air pollution.



UNPLUG: Save energy by unplugging small electronics and chargers from wall sockets when not in use.

Eat sustainably



GO LOCAL: Shop at farmers markets to support local food systems and know where — and how — your food is produced.



TRY MORE PLANT-BASED MEALS: Processed foods and meats often require more resources to produce.

Move more



USE PUBLIC TRANSPORTATION: People who take public transit are 4 times more likely to walk 10,000 steps a day.



WALK OR RIDE A BIKE FOR SHORT TRIPS: You'll reduce carbon emissions and see your neighborhood in a whole new way.

Conserve water



FIX LEAKS: Regularly check toilets, faucets and irrigation for leaks.



BE CONSCIENTIOUS: Take shorter showers. Run washing machines and dishwashers only when full.

Curtail chemicals



CHOOSE HEALTHIER PRODUCTS: Select soaps, lotions and other personal care products without synthetic chemicals or fragrances.



MAKE YOUR OWN HOUSEHOLD CLEANERS: White vinegar and baking soda are non-toxic and work on almost everything.

Reduce waste



BUY SMART: Purchase durable and reusable products, products with less packaging and products that are sustainably produced.



RECYCLE MORE: From paper to light bulbs, many household products can (and should) stay out of the trash.

maybe
CITY of
Birmingham
←

Comment Letter "E"

Burlingame CAP suggestions – from Christine Yballa, resident of Burlingame

The CAP is very well thought out and I believe it is going to be valuable to the city of Burlingame. Below, I listed some of my thoughts as I read through the CAP.

A CAP is not going to change views of the community unless the community is aware of the CAP and why it is necessary. In other words, the city needs to encourage residents to come together and have discussions regarding climate change and make it our business too. There is a great need to influence Burlingame as a community to make those necessary steps to change and I believe they will step up to the challenge if they are aware of the need and are involved in the process. It will be necessary for an aggressive outreach program. It may be helpful to start with educating the city employees initially and then including them in a whole city- wide town hall meetings prior to adoption.

E-3

I think it is important that the municipal operations purchase electric vehicles for staff as cars are retired out. I know some city authorities have already purchased these vehicles on a voluntary basis. I realize some electric vehicles may not be available for specific uses, but all others should be mandatory. There also needs to be more infrastructure built to accommodate the charging of these city cars. There is a great opportunity here to set an example of how serious Burlingame is in combatting climate change.

E-4

I would hope that as the city of Burlingame begins to tackle the CAP and reduce our greenhouse gases that other agencies may follow suit such as hospitals, schools, and neighboring cities. I think it is very important for the school district to be aware of what the city's goals are and hopefully they would include any improvement to their school plans to strengthen our citywide contributions to cut our carbon footprint together. I worked at the Burlingame School District for a short period and I became aware of how important it is to get the younger generation involved in caring for our planet. When the children are educated about the subject, they not only understand it, they are passionate about it.

E-5

The City of Burlingame could consider moving their investments out of institutions that contribute to the funding of fossil fuel industries. There is a common trend to move in this direction due to the values of providing a livable future and for pure investment reasons such as financial risks due to climate change. They could explore the possibilities.

E-6

The CAP **should** include the GHG Reduction measures "not quantified." All those ideas are important to include in discussions with the community and are vital to include in some aspect of the plan.

E-7

I feel the Burlingame CAP is a great start but needs more input from the community from beginning to end.

E-8

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Response to Comments from Christine Yballa, Interested Individual

Comment E-1: Ms. Yballa provides an example of public education and outreach document pertaining to sustainability that the City could implement.

Response to Comment E-1: Comment noted. The City provides similar information graphics through its sustainability website and will consider this document as it prepares future education and outreach materials pertaining to the 2030 CAP Update.²

Comment E-2: Ms. Yballa comments it is important to involve the Burlingame community in the implementation of the 2030 CAP Update and offers assistance to the City in doing so.

Response to Comment E-2: The City concurs with Ms. Yballa and appreciates her offer of assistance. Please also see Response to Comment E-8.

Comment E-3: Ms. Yballa reiterates it is important to involve the Burlingame community in the implementation of the 2030 CAP Update.

Response to Comment E-3: The City concurs with Ms. Yballa. General Plan Policy CC-1.12 requires the City to continue to educate the community about sustainable development strategies, programs, and opportunities. As noted on page 61 of the 2-30 CAP Update, the City's Sustainability Coordinator will work closely with other City staff, residents, and businesses on CAP-related planning efforts. The Sustainability Coordinator would also continue to provide an Annual Sustainability Report to the City Council summarizing the programs and policies implemented by the City to improve sustainability. Finally, the City notes the Draft 2030 CAP Update was reviewed by and reflects the comments received from other City Departments, and the Sustainability Coordinator would continue to coordinate with City Departments that are integral to implementing the CAP as identified in the 2030 CAP Update Implementation and Monitoring Program (Table 36).

Comment E-4: Ms. Yballa states it is important that City purchase electric vehicles for staff as fleet vehicles need to be replaced and that more infrastructures are needed to support electric vehicle charging.

Response to Comment E-4: The City is committed to evaluating the specific characteristics of its vehicle fleet and the feasibility of acquiring fleet electric vehicles in the future. The City has revised GHG Emission Reduction Measure 6 to include a specific evaluation and study of the hurdles and opportunities for converting the City's fleet to electric vehicles as part of the development of its Electric Vehicle Strategic Plan (see Attachment 2). The Electric Vehicle Strategic Plan will also identify priority areas for installing new electric vehicle infrastructure in the City and opportunities to public/private partnerships to support future expansion and use of electric vehicles in the City.

Comment E-5: Ms. Yballa states it is important the Burlingame and San Mateo Union High School Districts be aware of the City's 2030 CAP Update and its GHG emission reduction targets.

Response to Comment E-5: As explained in more detail in Response to Comment B-1, the General Plan includes measures pertaining to school gardens (HP-1.13) and public education and outreach (CC-1.12), and the City may coordinate with local schools, school districts, and the County's Office of Education during implementation of the 2030 CAP Update and Envision Burlingame General Plan. In addition, the City has revised

² <https://www.burlingame.org/departments/sustainability/index.php>

Chapter 6 of the 2030 CAP Update to indicate the City's Sustainability Coordinator would work with the Burlingame School District to inform students of the City's goals for addressing climate change and the importance of sustainable practices.

Comment E-6: Ms. Yballa states the City should consider moving investments out of institutions that contribute to the funding of fossil fuel industries.

Response to Comment E-6: Comment noted. This recommendation would not change the information contained in the 2030 CAP Update.

Comment E-7: Ms. Yballa states the 2030 CAP Update should include the measures listed at the end of Chapter 4 that are "not quantified".

Response to Comment E-7: To clarify, the nine measures listed in the sidebar on page 55 of the 2030 CAP Update are part of the CAP and the City's General Plan. These measures would be implemented through the CAP and General Plan development review processes; however, the potential GHG emissions reductions associated with these measures could not be quantified and thus they do not numerically contribute towards the City reaching its annual GHG emission reduction targets.

Comment E-8: Ms. Yballa states more input from the community is needed on the 2030 CAP Update.

Response to Comment E-7: Comment noted. The City provided several opportunities and methods to review the Draft 2030 CAP Update. As explained in Chapter 6 of the 2030 CAP Update, the City's Sustainability Coordinator would continue to monitor and publically report on the implementation of the 2030 CAP Update on an annual basis at minimum. The CAP would also be periodically updated for public review and consideration.



Comment Letter "F"

June 12, 2019

Board of Directors

Michael McCord
Chair

Steve Cady
Vice Chair

Doug Silverstein
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Lisa Happich
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Eileen Kim

Shirley Lee

Jeff Londer

Terry Nagel

Steffen Rochel

Desiree Thayer

Carol Vollen

Marc Yelnick

Burlingame City Council, City Manager, and Sustainability Manager(s)
501 Primrose Rd.
Burlingame, CA 94010

Re: Feedback on the 2030 CAP Update draft

Honorable Burlingame City Council Members, City Manager, and Sustainability Manager(s),

On behalf of the Board of Directors of the Citizens Environmental Council of Burlingame, I write to share our feedback on the 2030 CAP Update draft released to the public on April 25, 2019.

We would first like to thank you for the opportunity to provide this feedback. We are truly appreciative of the support you've provided us over the last 10 years and the openness to considering our recommendations to foster a more environmentally sustainable Burlingame. We value our partnership and are pleased we work well together as a team.

Second, we'd like to commend the City on its volumes of past work to address greenhouse gas emissions including dozens of impactful initiatives every year as outlined in the Sustainability Manager's annual reports to the City Council since 2012. Thank you for dedicating these resources. The cumulative results are significant and meaningful. It is reassuring that Burlingame is on track to meet the State's GHG reduction targets for 2020, and we are proud of the work the City has done since the 2009 CAP.

Finally, we applaud your focus on continued cuts to greenhouse gas emissions via the measures outlined in this 2030 CAP Update draft, the annual monitoring of those measures, and the commitment to update the CAP every five years. This CAP update is an important event in our city's history, and we feel it is an amazing opportunity to set a winning foundation for long term sustainability.

Now that we have sufficiently reviewed the draft, we have the following concerns and possible solutions, both of which we'd like to address prior to the City Council considering the adoption of the 2030 CAP Update:

1. We recommend more aggressive GHG emission reduction targets

The UN IPCC's May 2018 Summary for Policy Makers, titled Global Warming of 1.5°C, presents huge existential threats of the current climate crisis. Referencing this report, the 2030 CAP Update draft, on Executive Summary page 1, says scientists "paint a far more dire picture of the immediate consequences of climate change than previously thought." The report also tells us that the next twelve years are critical to preventing catastrophic global warming.

Other alarming statements in the 2030 CAP Update draft show global warming as "unequivocal, occurring at an unprecedented rate," and with consequences "that could devastate coastal communities in California."

Not surprisingly, other recent scientific reports echo those dire warnings, including:

1. [Climate change worsens California wildfires](#) (Nov 2018)
2. [NOAA Billion-Dollar Weather and Climate Disasters](#) (2019)
3. [UN Intergovernmental Science-Policy Platform on species extinction](#) (2019)

And it seems a new devastating report or presentation is unveiled every week.

F-1

With this new scientific evidence, we believe our city's targets should exceed those set by the state of California in 2006 and 2016:

- achieve 2020 GHG emissions equal to 1990 emissions (AB 32, Sep 2006)
- achieve 2030 GHG emissions 40% below 1990 emissions (SB 32, Sep 2016)
- achieve 2050 GHG emissions 80% below 1990 emissions (SB 32, Sep 2016)

Why tie us for the next 5 years to targets set in 2016, almost 3 years ago? In this climate crisis, we don't want to reflect old reports that focus on limiting global warming to 2°C. Rather, we recommend setting targets that get us ahead of the state's, and in line with their next move, assuming they set more aggressive targets before our next CAP update in 2025.

As such, we recommend our Burlingame's 2030 CAP Update targets:

- achieve 2025 emissions 40% below 1990 levels (like San Francisco)
- achieve 2030 emissions 80% below 1990 levels (like Palo Alto)

By making this aggressive move, we also set the benchmark for neighboring cities just beginning their CAP revisions such as Menlo Park and San Mateo. The 2030 goal would also give Burlingame the distinction in San Mateo County of the most accountable in addressing climate change and providing happy and healthy living for current and future generations.

F-2

Note 1.1 – Another important reason, in our opinion, to have more aggressive reduction targets is that our 2030 CAP Update draft uses a production method for GHG emissions inventory calculations, versus consumption methods. As calculated by UC Berkeley's Cool Climate Network, the consumption method shows significantly higher emissions for the Burlingame community (approximately 2.6x higher based on 2013 calculations – 904k vs 350k tCO₂e) due to our relatively high median income and associated spending on items produced outside our city, and our relatively low manufacturing output and associated emissions inside our city. While we don't request the CAP switch to production calculations, we strongly believe our CAP targets should be more aggressive because of this discrepancy.

Comment Letter "F"

F-3

Note 1.2 – By our calculations, 53% of the projected emissions reductions by 2030 in the 2030 CAP Update draft come from 2 CAP Reduction Measures that the City does not exclusively manage or implement:

- Measure 4 – Caltrain Electrification (page 38)
- Measure 13 – Peninsula Clean Energy ECO100 (page 47)

While we don't advocate removing these from the 2030 CAP Update, we suggest they could be moved outside of Chapter 4 (possibly to a new 'County Climate Actions' section at the end of Chapter 2). This would help focus the community on the 18 items the city exclusively controls. That said, we greatly appreciate City Council and staff time previously dedicated to these projects which will bring substantial future rewards.

F-4

2. We recommend more specificity of language and obligations in measures 1-3, 5-12, 14-20

Many of these 18 GHG reduction measures in Chapter 4 pages 35-54 of the draft, we feel, would benefit from additional details in their Description, Actions, and Tracking. Furthermore, many activities are listed as "voluntary" and "encourage," which we feel should be replaced by language reflecting more commitment. As such, we recommend the CAP reduction measures contain more specificity and obligations (see below).

3. We recommend adding additional reduction measures to Chapter 4 including:

F-5

- **Execute Burlingame TDM plans** - Execute a Transportation Demand Management plan for the Burlingame Avenue Commercial Area and the Broadway Commercial Area to identify and implement actions and strategies that would reduce single-occupancy car trips and VMT by 50% below current levels. Implementations such as carpooling, designated parking for clean air and ridesharing vehicles, transit subsidies, bicycle parking, and employer sponsored shuttles. Palo Alto recently conducted a similar plan.

F-6

- **Accelerate Burlingame fleet electrification** – Adopt an "EV First" ordinance, like Sacramento, requiring all city fleet vehicle purchases to be zero emissions or electric vehicles unless there is no feasible zero emissions option. To set an example for the community, we also recommend that fleet vehicles prominently display and advertise the city's sustainability commitment.

F-7

- **Achieve ZNE, all-electric & low VMT Burlingame Recreation Center** – Identify and implement actions to achieve zero natural gas and zero net energy in Burlingame's new Recreation Center, like the Half Moon Bay Library, and advertise this achievement to the community. And, conduct a TDM plan for the Center that reduces single-occupancy car trips and VMT by 50% below standard levels.
- **Accelerate the transition from mixed fuel to carbon free, all-electric buildings** – Commit to adopt Peninsula Clean Energy and the San Mateo County Office of Sustainability 2019-2020 Title 24 Reach Code language and modify future code to mandate safer and cheaper all-electric buildings commensurate with other leading cities in the US. Further, any requirement or encouragement for "zero net energy" buildings should also include "all-electric."

F-8

- **Create a Community Zero Waste Plan** – Develop a plan to guide the community in diverting its waste from landfill disposal, manage resources to their highest and best use, and reduce waste at the source, that has specific strategies, implementation and quantified goals.

F-9

- **Consider joining carbon free city alliances** - Investigate and consider joining programs that guide cities to be more sustainable, such as the Carbon Neutral Cities Alliance, Climate Reality Project's 100% Committed campaign, and NRDC's All-in Cities Sustainability project.

4. We recommend more specificity of city staff dedication to CAP and sustainability activities

F-10


The tasks and demands the 2030 CAP Update places on the Sustainability Coordinator, and the many related initiatives Burlingame is already advancing, suggest the City will need to allocate more human resources and budget to sustainability activities than the single half-time position budgeted in the past. As such, we recommend staffing the sustainability area with resources commensurate with the large responsibilities and importance to our community.

F-11

Thank you for hearing our concerns and recommendations! We acknowledge the feedback within these four items is significant and understand the challenges associated with developing a CAP that meets a diversity of expectations. However, we also believe that earlier input may have generated a draft with fewer concerns and less feedback. While the lengthy General Plan process included frequent citizen outreach programs, this 2030 CAP Update draft was written by a team of experts and presented as a near completed document. We wish there had been more workshops and outreach opportunities to judge community interest during this process as is currently the case in Redwood City, San Mateo, and many other cities around the state.

In closing, we're confident you all care as deeply about the sustainability of our community as we do, and share our considerable concerns about global warming, climate change, and living within our ecological footprint. With this shared interest, we're confident we can draw on our strong working relationship, and together, enhance this document for the benefit of current and future generations in our city and region. And collectively, we can craft a plan that portrays us as leaders in addressing climate change and sustainable living, a true win-win for all parties.

Sincerely,



Michael McCord
Chair, Citizens Environmental Council of Burlingame

 info@cecburlingame.org

Addendum to Item 2 Above - Recommended specific language added to Chapter 4 Measures

Measure 3 – Complete Streets (#1 2030 emissions reduction impact of 18 measures in City control)

- Specify metrics, categories, and dates for multi-modal improvements, e.g. 10 miles of medium sized roadways improved with 10 curb extensions by 2022.
- Define and specify baseline numbers and annual increases for transportation impact fee that reward projects associated with low VMT.
- Participate in and advocate for inclusion of Burlingame roads in the San Mateo County Sustainable Streets Master Plan prioritization.

Measure 2 – TDM (#2 impact of 18 in City control)

- Increase goal to reduce single-occupancy car trips and VMT from 20% to 50%.
- Execute a TDM plan for the new Village at Burlingame and Burlingame Recreation Center that meet 50% reduction in trip generation rates and sets the benchmark for similar future plans.
- Specify who employs the TDM designated coordinator, how often and what information is included in their program effectiveness report and include the public in the audience for these report presentations.
- Institute meaningful fines for not meeting single-occupancy car trips and VMT reduction goals.

Measure 10 – Construction Best Management Practices (#3 impact of 18 in City control)

- Replace “encourage” with “mandate.”
- Pass resolution by 2022 and replace “when feasible” with “unless otherwise demonstrated that no alternative feasible solutions exist.”

Measure 12 – Energy Efficiency (#4 impact of 18 in City control)

- Replace “encourage” with “mandate” in first and second sentences of *Actions*.
- Replace word “voluntary” with “mandated” in *Tracking*.
- Specify the number of workshops.
- Pass a building energy savings ordinance (BESO), like Boulder, CO and Berkeley, CA, by 2022 that requires residential and commercial property owners to improve energy efficiency before a sale.

Measure 18 – Zero Waste (#5 impact of 18 in City control)

- Add “Create Community Zero Waste Plan” -- to guide the community in diverting its waste from landfill disposal, managing resources to their highest and best use, and reducing waste at the source -- that has specific strategies, implementation and quantified goals, similar to plans adopted in Menlo Park and Palo Alto.

Other Measures

- Measure 5 – include scooters, pods, and rent-per-hour car-sharing (e.g. ZipCar).
- Measure 6 – ensure all new commercial development includes sufficient high-speed chargers to spur EV demand.
- Measure 7 – include free 2-hour parking and charging for EVs in City parking spaces.
- Measure 11 – replace 2030 with 2023.
- Measure 17 – include dates for Energy Star requirements; consider adding grey water dual pipe mandates for new construction.

SENT BY EMAIL -- on 06/12/2019 to council@burlingame.org, apappajohn@burlingame.org, smichael@burlingame.org

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Response to Comments from Michael McCord, Chair, Citizens Environmental Council

Note: In addition to their comment letter of June 12, 2019, the CEC provided the City with direct edits to an electronic file of the Draft 2030 CAP Update on July 2, 2019. Many of these direct edits were similar to the comments described below. The CEC's direct edits are available for review from the City's Sustainability Coordinator upon request. The City and the CEC also held a conference call to discuss the CEC comments on the Draft 2030 CAP Update on July 17, 2019.

Comment F-1: The CEC recommends more aggressive annual GHG emission reduction targets for the 2030 CAP Update.

Response to Comment F-1: The City has carefully reviewed the CEC's recommendation and elected not to incorporate more aggressive annual GHG emission reduction targets into the 2030 CAP Update for several reasons.

First, the City's 2030 CAP Update builds, in part, on the City's sustainability efforts completed as part of the City's 2009 CAP, which set a target to reduce GHG emission 15% below 2005 levels by 2020. This target was consistent with Assembly Bill 32, which initiated many of the State's major climate planning initiatives, such as the Climate Change Scoping Plan. As shown in Chapter 4 of the 2030 CAP Update, the City is on track to meet its 2020 GHG emission reduction target, which sets a logical starting point and trend for future GHG emissions reduction targets.

Second, the City's 2030 CAP Update annual GHG emission reduction targets were developed in consultation with the BAAQMD, and are consistent with the BAAQMD's GHG emission reduction targets established in the BAAQMD's 2017 Clean Air Plan, as well as BAAQMD Resolution 2013-11, *A Resolution Adopting a Greenhouse Gas Reduction Goal and Commitment to Develop a Regional Climate Protection Strategy*.^{3,4}

Third, the City's 2030 CAP Update annual GHG emission reduction targets also align with the State's current GHG emission reduction goals established by AB 32, Senate Bill (SB) 32, and the 2017 Climate Change Scoping Plan, which were developed using the United Nations (UN) Intergovernmental Panel on Climate Change (IPCC) climate change assessment reports and are intended to keep global temperature increases below 3.6 °F.

Finally, more aggressive GHG emission reductions are not required for the City's 2030 CAP Update because the City's 2030 CAP Update includes measures that would reduce GHG emissions from both existing and new development. A more aggressive target would be more appropriate if existing sources of emissions would not be reduced. But the City's 2030 CAP Update reduces GHG emissions from existing and future VMT, existing and future energy sources, existing and future solid waste generation, etc.

For the reasons outlined above, the City's 2030 CAP Update sets GHG emission reduction targets that are consistent with regional, state, and international climate planning efforts. The City appreciates the CEC's desire to set more aggressive targets, and recognizes that climate change science is constantly evolving. For this reason, Chapter 6 of the 2030 CAP Update incorporates the development of an Annual Sustainability Report and a periodic CAP update (every five years, beginning in 2025). These reports and periodic updates will allow the City to track progress towards meeting current GHG emission reduction targets and consider new targets as additional scientific

³ <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>

⁴ <http://www.baaqmd.gov/plans-and-climate/climate-protection/climate-protection-program>

evidence becomes available and incorporated into regional, state, and international planning efforts.

Comment F-2: The CEC comments on the 2030 CAP Update's sector- or production-based GHG emission quantification methodology.

Response to Comment F-2: Please see Response to Comment C-1. The 2030 CAP Update's methodology is consistent with the City's previous 2009 CAP efforts, the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (Version 1.1), and, in general, the State's GHG emissions reporting protocols used to track progress towards meeting State GHG emission reduction goals (which do not use a consumption method).

Comment F-3: The CEC recommends GHG emissions reductions associated with GHG Emission Reduction Measure 4 (Caltrain Electrification) and GHG Emission Reduction Measure 13 (Peninsula Clean Energy) should be moved from Chapter 4 because the City does not exclusively manage or implement these measures.

Response to Comment F-3: The CEC is correct that the City does not solely manage or implement GHG Emission Reduction Measure 4 or 13; however, City staff have worked over the years to support Caltrain electrification efforts, and have enrolled all municipal accounts in Peninsula Clean Energy's ECO100 program. City staff will continue to support Caltrain electrification efforts and will provide information and support for expanding non-municipal enrollment in Peninsula Clean Energy's ECO100 program. Furthermore, moving the emission reductions from the City's GHG emission reduction strategy to the Adjusted BAU or another scenario would not change the City's annual GHG emission reduction targets or bottom line future year emission estimates.

Comment F-4: The CEC recommends the 2030 CAP Update include more specific language in Chapter 4 regarding GHG Emission Reduction Measure descriptions, actions, and tracking requirements. The CEC also recommends GHG Emission Reduction Measures not be voluntary in nature.

Response to Comment F-4: Regarding the voluntary nature of some of the GHG Emission Reduction Measures contained in the 2030 CAP Update, the City has incorporated voluntary measures because such measures allow for a case by case consideration of project specific variables, including costs, by each project proponent that are not currently known and which control whether any particular technology or equipment is feasible for a particular project. The 2030 CAP Update incorporates lower participation rates and lower total equipment turnover rates to account for the voluntary nature of these measures. Should such measures become mandatory as a result of future State or City actions, the additional GHG emissions reductions would be realized within the City.

Please refer to Response to Comments F-5 through F-9 and F-12 for responses to the City's suggestions regarding more specific language for specific GHG Emission Reduction Measures.

Comment F-5: The CEC recommends the City include a transportation demand management (TDM) plan for the Burlingame Avenue and Broadway Commercial Areas that reduces single-occupancy car trips by 50% below current levels.

Response to Comment F-5: 2030 CAP Update Measure 2 (Transportation Demand Management) requires a 20% reduction in trip generation rates from residential and non-residential development, beginning with new development projects and, over time,

transitioning to existing development projects. The City has added an action to this measure to coordinate with local businesses in the Broadway and Burlingame Avenue Commercial Areas on the development of a Transportation Management Association that reduces existing trip generation rates in these areas (see Attachment 2). The City cannot, at this time, require a 50% reduction in single occupancy vehicle trips from these areas because tracking single occupancy vehicle trips would require significant data collection efforts and a 50% reduction from carpooling, ridesharing, transit subsidies, and other typical trip reduction measures is not considered feasible for the City.

Comment F-6: The CEC recommends the City accelerate its vehicle fleet electrification.

Response to Comment F-6: The City is committed to evaluating the specific characteristics of its vehicle fleet and the feasibility of acquiring fleet electric vehicles in the future. The City has revised GHG Emission Reduction Measure 6 to include a specific evaluation and study of the hurdles and opportunities for converting the City's fleet to electric vehicles as part of the development of its Electric Vehicle Strategic Plan (see Attachment 2).

Comment F-7: The CEC recommends the City identify and implement actions to achieve zero net energy in certain City facilities, as well as a 50% reduction in single-occupancy car trips and VMT below standard levels from the City's new Recreation Center. The CEC also recommends the City accelerate the transition from mixed fuel buildings to carbon-free, all electric buildings by commit to adopting Peninsula Clean Energy and the San Mateo County Office of Sustainability's 2019-2020 Title 24 reach code requirements and including references in the 2030 CAP Update to zero net energy, all electric buildings.

Response to Comment F-7: GHG Emission Reduction Measure 19, Municipal Green Building Measures, requires the City to aim for zero net energy in all new municipal construction and major renovations of City facilities. New City facilities would also be subject to the TDM requirements of GHG Emission Reduction Measure 2 (20% reduction in trip generation rates); a 50% reduction in trip generation rates is not considered feasible for a new civic-oriented facility that will draw vehicle trips from across the City. GHG Emission Reduction Measure 11 (Green Building Practices and Standards) and GHG Emission Reduction Measure 12 (Energy Efficiency) encourage development projects to incorporate the voluntary provisions of the Title 24 building standards. The City is currently exploring the development of a reach code that may require the incorporation of voluntary energy efficiency standards and/or multiple or all electric energy pathways. Should the 2030 CAP Update's voluntary measures become mandatory as a result of future State or City actions, additional GHG emission reductions would be realized within the City.

Comment F-8: The CEC recommends the City create a Community Zero Waste Plan to support waste diversion goals.

Response to Comment F-8: GHG Emission Reduction Measure 18, Zero Waste, establishes increasing waste diversion goals within the City, reaching 85% waste diversion by 2030 and 95% waste diversion by 2050. The City has revised this measure to include the development and preparation of a Community Zero Waste Plan by 2025 that achieves 90% waste reduction by 2030 and 100% waste reduction by 2050 (see Attachment 2).

Comment F-9: The CEC recommends the 2030 CAP Update include a measure requiring the City to investigate and consider joining carbon free city alliances, such as the Carbon Neutral

Cities Alliance, Climate Reality Project's 100% Committed campaign, and the Natural Resource Defense Council's All-in Cities Sustainability Project.

Response to Comment F-9: The City may consider resolutions supporting or joining the CEC's recommended programs in the future; however, such action would not result in direct, quantifiable GHG emissions reductions. Therefore, this measure has not been added to the 2030 CAP Update.

Comment F-10: The CEC recommends the City allocate additional resources to the 2030 CAP Update and sustainability activities.

Response to Comment F-10: Comment noted. The 2030 CAP Update was developed based on the City's existing resource commitments. If additional resources become available, additional GHG reductions may be realized within the City.

Comment F-11: The CEC states that the 2030 CAP Update would have benefitted from earlier opportunities to review and provide comment on the City's climate action planning efforts, such as workshops, outreach events, etc. that could have judged community interest in the 2030 CAP Update and its GHG Emission Reduction Measures.

Response to Comment F-11: Comment noted. As the CEC indicates in its remarks, the City's General Plan process did include multiple outreach efforts on all aspects of the plan, including its sustainability initiatives. The City will consider the CEC's remarks as part of the periodic CAP updates described in Chapter 6 of the 2030 CAP Update.

Comment F-12: The CEC provides specific, recommended text edits to the GHG Emission Reduction Measures contained in Chapter 4 of the 2030 CAP Update.

Response to Comment F-12: In response to the CEC's specific text edits:

- GHG Emission Reduction Measure 3 (Complete Streets): The CEC recommends specific metrics, projects, transportation impact and fee information. As identified in Table 18 of the 2030 CAP Update, the specific assumptions used to estimate emissions reductions from GHG Emission Reduction Measure 3 are contained in CAP Appendix C, page 3. The CAP assumes 10% of intersections and 25% of street miles would be improved by 2030. The specific projects that would be implemented would be identified as part of the Bicycle and pedestrian Master Plan that is required to be prepared by 2025. The City would evaluate options for reducing its transportation impact fee separately, in consultation with the Public Works Department. Finally, the CEC recommends the City participate and advocate for inclusion of the City's roads in the County's Sustainable Master Plan prioritization. This action has been added to the 2030 CAP Update.
- GHG Emission Reduction Measure 2 (Transportation Demand Management): The CEC recommends increasing the targeted trip reduction from 20% to 50% and identifying other specific information regarding TDM plan implementation. At this time, a blanket 50% reduction in single-occupancy vehicle trips from existing and new development is not considered a feasible trip reduction target given the type of trip reduction measures that are likely to be implemented through this measure. As points of clarification, TDM coordinators would likely be an employee or volunteer residential coordinator. In addition, the 2030 CAP Update provides a programmatic evaluation of GHG emissions in the City; identifying project-specific requirements is generally not the intent nor purpose of the CAP. Finally, deterrents and penalties for failing to comply with the requirements of the

City's TDM ordinance, once adopted, would be identified in the code provisions implementing TDM requirements.

- GHG Emission Reduction Measure 10 (Construction Best Management Practices): The CEC recommends the City make this measure mandatory and pass an ordinance prohibiting the use of petroleum-based fuel sources for construction equipment less than 120 horsepower by 2022, instead of 2025 as identified in the 2030 CAP Update. The City is not electing to accelerate the schedule for the mandatory prohibition of petroleum-fueled equipment for several reasons. First, the voluntary application of this measure is expected to provide time for projects to acclimate to this requirement, as well as time for additional technologies to develop for the specific equipment targeted by this measure. Second, it is not feasible for City staff to accelerate the timeline for adopting the ordinance identified in GHG Emission Reduction Measure 10. In developing the CAP, the City considered existing resources and anticipated staffing commitments to identify realistic timelines for implementation of the GHG Emission Reduction Measures identified in the 2030 CAP Update.
- GHG Emission Reduction Measure 12 (Energy Efficiency): The CEC recommends this measure be mandatory, the 2030 CAP Update specific the amount of energy efficiency workshops to be held per year, and the City include a building energy savings ordinance that requires energy efficiency improvements before the sale of a building. As explained in more detail in Response to Comment F-7, G-5, and G-21 the City is maintaining the voluntary status of the 2030 CAP Updates energy efficiency measures. In addition, the City is not proceeding with a building energy savings ordinance because it is anticipated that much of the City's older building stock will be upgraded and updated immediately following the sale of a building (as part of a redevelopment or remodel process). The City has, however, clarified the language in GHG Emission Reduction Measure 12 to indicate the City will hold up to three energy efficiency workshops per year (see Attachment 2).
- GHG Emission Reduction Measure 18 (Zero Waste): The CEC recommends the City include a Community Zero Waste Plan as part of GHG Emission Reduction Measure 18. The City has revised this measure to include the development and preparation of a Community Zero Waste Plan by 2025 that achieves 90% waste reduction by 2030 and 100% waste reduction by 2050 (see Attachment 2).
- GHG Emission Reduction Measure 5 (Electric Vehicle, Bicycle, and Scooter Sharing): As recommended by the CEC, the City has revised this measure to include opportunities for electric vehicle and electric scooter sharing services if such services are developed in the City.
- GHG Emission Reduction Measure 6 (Electric Vehicle Infrastructure and Initiatives): GHG Emission Reduction Measure 6 requires the installation of Level 2 chargers in new residential development. GHG Emission Reduction Measure 6 also requires the City to develop and prepare an Electric Vehicle Strategic Plan by 2022 that will identify priority areas for installing new electric vehicle infrastructure in the City and opportunities to public/private partnerships to support future expansion and use of electric vehicles in the City. The expansion of high speed chargers in commercial areas and developments of the City would be considered as part of the development of the Electric Vehicle Strategic Plan.

- GHG Emission Reduction Measure 7 (Parking Pricing, Parking Requirements, and Creative Parking Approaches): The CEC recommends free parking and charging for electric vehicles. GHG Emission Reduction Measure 7 is aimed at reducing parking availability as a means to reduce VMT; however, the City would consider parking incentives for electric vehicles as part of the Electric Vehicle Strategic Plan required by GHG Emission Reduction Measure 6.
- GHG Emission Reduction Measure 11 (Green Building Practices and Standards): As explained in more detail in Response to Comment F-7, G-5, and G-21 the City is maintaining the voluntary status of the 2030 CAP Updates energy efficiency measures. In addition, the City is not proceeding with a zero net energy ordinance by 2030 (see Attachment 2); however, the City is currently exploring the development of a reach code that may require the incorporation of voluntary energy efficiency standards and/or multiple or all electric energy pathways. The zero net energy requirement for non-municipal development was not included in the 2030 CAP Updates GHG emission inventories and forecasts.
- GHG Emission Reduction Measure 17 (Water Conservation for New Residential Development): The City has clarified this measure to remove reference to “Energy Star” faucets, as faucets and other water fixtures are not Energy Star rated. In addition, gray water systems are currently allowed by State and City plumbing codes. The City has revised this measure to encourage the installation of gray water systems.

Comment Letter "G"

From: [MGR-Andrea Pappajohn](#)
To: [Jakub Zielkiewicz](#)
Cc: [Chris Dugan](#); [Phillip Gleason](#); [MGR-Sigalle Michael](#)
Subject: RE: Call re: Burlingame Climate Action Plan
Date: Monday, July 1, 2019 2:09:59 PM

Hi Jakub

Thanks for your informal comments below.

[REDACTED]

[REDACTED]

Thanks
Andrea

-----Original Message-----

From: Jakub Zielkiewicz [<mailto:jzielkiewicz@baaqmd.gov>]
Sent: Monday, July 1, 2019 1:54 PM
To: MGR-Andrea Pappajohn <apappajohn@burlingame.org>
Subject: RE: Call re: Burlingame Climate Action Plan

Hi Andrea,

[REDACTED]

We've reviewed the CAP and have some informal comments, which I include below. I want to emphasize that these are staff informal comments that have not been routed for appropriate approval, and so they are not official BAAQMD comments.

[REDACTED]

Thanks,

Jakub

Informal CAP comments

- G-1 | Executive Summary – in general, the sector summaries provide good insights into the city's actions. However, the summary lacks specificity in terms of substance and timeframe. Consider including specific time-bound targets and actionable items.
- G-2 | ES1, 2nd paragraph (typo): "According to new research, unabated greenhouse gas (GHG) emissions could cause sea levels to rise by to ten feet by the end of this century - an outcome that could devastate coastal communities in California and around the world."
- G-3 | ES4 - "Still, changing people's behavior to drive less is one of Burlingame's trickiest challenges in reducing GHG emissions." The Clean Transportation section ends with the sentence above. Consider a statement with more

Comment Letter "G"

- G-3 con't.** | definitive closure to the section. More importantly, Burlingame has the ability to influence people's driving behavior through the establishment of low emissions zones, road diets, etc. Burlingame should consider adoption of such policies to change people's behavior to drive less, or at least include timebound language in the CAP to study these types of policies.
- G-4** | ES5 (also in footnote A of Table 13) - "Most recently, the State approved a shift to 100% renewable energy by 2045..." should read "100% carbon-free electricity." This is a minor word change, but it's a big difference in renewable energy circles. See the underlying law for additional information:
https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100
- G-5** | ES5 - "however, the City recognizes that stronger policies will be necessary in the future." Consider setting a goal, i.e.: a commitment to electrify all municipal buildings or X% of housing; to conduct a technical and legal feasibility study about fuel switching in Brisbane no later than 2020; to establish an energy benchmarking ordinance (<https://sfenvironment.org/existing-buildings-energy-performance-ordinance>) or building energy saving ordinance (<https://www.cityofberkeley.info/BESO/>) no later than 2020; etc.
- G-6** | ES5 - "The City is examining its own waste practices by striving for zero waste in municipal buildings and public events. Burlingame also anticipates participating in future waste movements, similar to the plastic bag ban movement, to reduce plastic pollution and promote source reduction." This is great. Consider including a timeframe to achieve zero waste and to pass a plastic bag ban.
- G-7** | ES5 – Urban forestry. How many trees to be planted annually?
- G-8** | ES-6, 2nd paragraph (typo): "Urban Forestry. Burlingame is proud of being a designated a "Tree City," due to its canopies of diverse, mature, and expansive trees along public streets, private property, and parks and natural areas."
- G-9** | Figure 2: consider labeling Y-axis and plotting the 2020 and 2030 targets on the graph
- G-10** | ES8 - "Procures all electricity from 100% renewable energy sources by 2030" PCE has a goal of 100% by 2025. Unless Burlingame is going to opt-out of PCE, consider changing this date to 2025.
- G-11** | ES8 - "Makes significant cuts in transportation related emissions" Consider quantifying and setting a target.
- G-12** | Page 5, 4th paragraph, consider including descriptions of the three policies that were introduced into the General Plan as mitigation measures to help reduce GHGs
- G-13** | Page 10-12 – "state climate actions." SB 32 (40% below 1990 levels by 2030) is missing as Executive Order B-55-18 (carbon neutrality no later than 2045)
Page 11 – SB 100 "and requires 100% of all electricity supplied come from renewable sources by 2045." This should read "...supplied from carbon-free sources..."
- G-14** | Page 13, paragraph about Year 2005 inventory – a bit confusing to the reader if the data for 2005 are the original numbers from the 2009 CAP or are the updated numbers generated for this CAP (text implies it's the latter, but might want to clarify to avoid confusion)
- G-15** | Page 14, graph: consider adding the 2015 total GHG emissions, and amounts for each sector
- G-16** | Page 15: Footnote 20. This guidance is dated and should not be used/referenced.
- G-17** | Page 16, 3rd full paragraph. Text about future emissions seems out of place in a discussion of the 2005 and 2015 inventories ("Emissions from electricity are anticipated to zero out in the future...")
- G-18** | Page 16 - "Emissions from natural gas will be tougher to reduce since the cost of natural gas remains relatively low and electrifying natural gas appliances and processes can be expensive and infeasible." This statement makes the case for the status quo, rather than provide a vision to reduce GHGs. Consider striking this statement and reframing to offer a vision of reducing GHGs through less dependence on natural gas via building electrification.

Comment Letter "G"

- G-19** | Page 17, 3rd paragraph on transportation: language about what City could do seems out-of-place in inventory section (“Local governments may limit the use of...”)
- G-20** | Page 25, Table 9. Add units to this table
- G-21** | Page 28 – what about alignment with State objective of carbon neutrality no later than 2045 (Executive Order B-55-18)?
- G-22** | Page 29, graph: It is unclear what the orange area represents since it is not defined in the legend. Should this cut off at 2015 since it seems this is meant to represent the historical emissions?
- G-23** | Chapter 4 – overarching comment: without Appendices, cannot comment/review calculations of emission reductions. For example:
3. Complete Streets: How does the City justify the emission reductions associated with this measure? Not sure it is reasonable to expect similar reduction amounts from street infrastructure improvements (which are also costly) as from 2. TDM requirements outlined.
10. Construction Best Management Practices. What is the breakdown between equipment less than 120 hp (covered by the ordinance) and that above 120 hp to be able to expect the emission reductions indicated?
18. Waste. Unclear how incremental increases in waste diversion of 5% every ten years would lead to indicated emission reductions. Compared to ABAU solid emissions where 75% diversion required (Table 9): 39% by 2030 (2760/7106), 59% by 2040 (4483/7640), 79% by in 2050 (6435/8181)
- G-24** | Chapter 4 – overarching comment: To increase the likelihood that measures achieve the emission reductions indicated, measures should require, over just encouraging, actions
12. Energy Efficiency. Many of the actions focus on encouraging, informing, etc. While the description for the measure indicates major remodels would be required to meet Title 24 standards, it is not clear how that would be achieved (e.g., ordinance?).
13. Peninsula Clean Energy ECO100. The actions outlined in this measure do not require opting to ECO100, yet the reductions claimed by 2020 seem very unlikely unless this opt up is required (or incentivized).
- G-25** | Page 47 - “By 2030, the entire portfolio will be 100% GHG free...” yet in the previous sentence you state the goal is 100% by 2021.
- G-26** | Page 49 – Alternatively-Powered Residential Water Heaters – this section highlights solar water heaters, which is great. However, it also advocates for tankless natural gas water heaters. Consider deleting the natural gas tankless water heaters, and instead emphasizing the need to electrify water heaters to heat pump water heaters. In addition, consider bolstering the “Actions” section to include working with PCE to establish rebate programs for building electrification.
- G-27** | Page 66 – Table 36. Measures are classified as mandatory while the actions called for are focused on coordinating, supporting, encouraging (e.g., 13, 14).

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Response to Comments from Jakub Zielkiewicz, BAAQMD

Note: The BAAQMD provided informal comments on the Draft CAP Update. Although these comments are informal, the City has included its correspondence with the BAAQMD in this document for information disclosure purposes. The City also discussed the BAAQMD's informal comments in a phone call with BAAQMD staff Jakub Zielkiewicz and Abby Young on July 3, 2019.

Comment G-1: The BAAQMD recommends adding additional information to the 2030 CAP Update Executive Summary.

Response to Comment G-1: Comment noted. The 2030 CAP Update Executive Summary was not meant to be exhaustive. Rather, it was meant to provide a high level summary of the City's CAP Update. Nonetheless, the City has revised the Executive Summary to provide additional information on the 2030 CAP Update GHG emissions targets, actionable items, and timelines for implementing GHG Emission Reduction Measures. Specific information on time-bound targets and actionable items is also contained in Chapters 4 and 6 of the 2030 CAP Update.

Comment G-2: The BAAQMD identifies a typographical error on page ES-1 of the Draft 2030 CAP Update.

Response to Comment G-1: Comment noted. This typographical error has been corrected (see Attachment 2).

Comment G-3: The BAAQMD recommends the City consider policies to change people's behavior when it comes to driving.

Response to Comment G-3: Comment noted. The 2030 CAP Update includes several measures that are intended to reduce vehicle trips and vehicle miles travelled, including GHG Emission Reduction Measure 1 (Mixed-Use Development, Transit-Oriented Development, and Transit Supporting Land Use), GHG Emission Reduction Measure 2 (Transportation Demand Management), GHG Emission Reduction Measure 3 (Complete Streets), GHG Emission Reduction Measure 5 (Electric Vehicle, Bicycle, and Scooter Sharing), GHG Emission Reduction Measure 7 (Parking Pricing, Parking Requirements, and Creative Parking Approaches), and GHG Emission Reduction Measure 8 (Burlingame Shuttle Service). Together, these measures are estimated to reduce VMT by approximately 21% in 2030, or nearly 60 million VMT.

Comment G-4: The BAAQMD provides a clarification regarding the requirements of Executive Order (EO) B-55-018.

Response to Comment G-3: Comment noted. The City has clarified the requirements of EO B-55-018 (see Attachment 2).

Comment G-5: The BAAQMD recommends the City consider adopting strong policies for energy efficiency and retrofitting natural gas appliances.

Response to Comment G-5: The 2030 CAP Update includes multiple strategies related to energy efficiency and retrofitting natural gas appliances. GHG Emission Reduction Measure 11 (Green Building Practices and Standards) and GHG Emission Reduction Measure 12 (Energy Efficiency) encourage development projects to incorporate the voluntary provisions of the Title 24 building standards. The City is currently exploring the development of a reach code that may require the incorporation of voluntary energy efficiency standards and/or multiple or all electric energy pathways. Should the 2030 CAP Update's voluntary measures become mandatory as a result of future State or City actions, additional GHG emission reductions would be realized within the City. In

addition, GHG Emission Reduction Measure 15 encourages the transition from tank-based natural gas water heaters to solar or electric-powered water heaters in residential development, and GHG Emission Reduction Measure 19, Municipal Green Building Measures, requires the City to aim for zero net energy in all new municipal construction and major renovations of City facilities.

Comment G-6: The BAAQMD recommends the City consider a time frame to achieve zero waste and pass a plastic bag ban.

Response to Comment G-6: GHG Emission Reduction Measure 18, Zero Waste, establishes increasing waste diversion goals within the City, reaching 85% waste diversion by 2030 and 95% waste diversion by 2050. The City has revised this measure to include the development and preparation of a Community Zero Waste Plan by 2025 that achieves 90% waste reduction by 2030 and 100% waste reduction by 2050 (see Attachment 2). The City is not considering a plastic bag ban at this time.

Comment G-7: The BAAQMD requests information on the amount of trees that will be planted annually under the 2030 CAP Update.

Response to Comment G-7: GHG Emission Reduction Measure 20, Increase the Public Tree Population, requires the City to plant a minimum of 33 trees annually through 2050.

Comment G-8: The BAAQMD identifies a typographical error on page ES-6 of the Draft 2030 CAP Update.

Response to Comment G-8: Comment noted. This typographical error has been corrected (see Attachment 2).

Comment G-9: The BAAQMD recommends changes to Figure 2 in the 2030 Draft CAP Update.

Response to Comment G-9: Comment noted. The City has revised Figure 2 to address the BAAQMD's comment (see Attachment 2).

Comment G-10: The BAAQMD recommends clarifying the dates identified in the 2030 CAP Update for procuring all electricity from renewable energy sources.

Response to Comment G-10: Comment noted. The City has clarified text referring to the date by when electricity would be procured from renewable energy sources (see Attachment 2). As explained in GHG Emission Reduction Measure 13, Peninsula Clean Energy has a strategic goal of sourcing 100% GHG emission-free electricity by 2021 and 100% California Renewable Portfolio Standard-eligible electricity by 2025. Since the 2030 CAP Update estimates emissions for 2020, 2030, 2040, and 2050, the GHG emission benefits resulting from Peninsula Clean Energy are only included in the estimates for years 2030, 2040, and 2050.

Comment G-11: The BAAQMD recommends the 2030 CAP Update quantify and set a target for reducing transported related emission.

Response to Comment G-11: Comment noted. The 2030 CAP Update does quantify and set targets for reducing transportation-related GHG emissions. Please see Response to Comment G-3.

Comment G-12: The BAAQMD recommends the 2030 CAP Update include descriptions of the General Plan policies / GHG Emission Reduction Measures included in the 2040 General Plan EIR as mitigation measures.

Response to Comment G-12: Comment noted. The City has revised the 2030 CAP Update to include brief descriptions of the policies/GHG Emission Reduction Measures

added as mitigation measures during the General Plan EIR process. These three policies were: M-3.10: Bicycle Sharing, M-4.7: Shuttle Service, and IF-6.9: ECO100 (see Attachment 2).

Comment G-13: The BAAQMD provides additional, relevant contextual information on State climate actions.

Response to Comment G-13: Comment noted. The City included this additional contextual information in the 2030 CAP Update (see Attachment 2).

Comment G-14: The BAAQMD suggests the text on page 13 of the Draft 2030 CAP be clarified to indicate if the 2005 emissions data presented in the document has been updated or is the original data from the City's 2009 CAP.

Response to Comment G-14: The 2005 emissions data presented in the 2030 CAP Update is updated emissions data based on the key updates to the 2009 methodology described in Chapter 1 of the document. The City has clarified the 2030 CAP Update to indicate this (see Attachment 2).

Comment G-15: The BAAQMD recommends adding an additional graphic showing 2005 emissions by sector

Response to Comment G-15: Comment noted. Since the 2030 CAP Update forecasts emissions based on growth from the 2015 inventory year, a graphic showing 2005 emissions by sector has not been added to the 2030 CAP Update.

Comment G-16: The BAAQMD identifies obsolete information contained in the 2030 CAP Update.

Response to Comment G-16: Comment noted. The City has deleted the information in question from the 2030 CAP Update.

Comment G-17: The BAAQMD comments some of the information on 16 of the 2030 CAP Update appears out of place.

Response to Comment G-17: Comment noted. The City has revised the 2030 CAP Update to reflect this comment.

Comment G-18: The BAAQMD comments the discussion on page 16 of the 2030 CAP Update should be revised.

Response to Comment G-18: Comment noted. The City has revised the 2030 CAP Update to reflect this comment.

Comment G-19: The BAAQMD comments some of the information on 17 of the 2030 CAP Update appears out of place.

Response to Comment G-19: Comment noted. The City has revised the 2030 CAP Update to reflect this comment.

Comment G-20: The BAAQMD recommends units be added to Table 9 of the 2030 CAP Update.

Response to Comment G-20: Comment noted. The City has units (metric tons of carbon dioxide equivalents, or MTCO₂e) to this table.

Comment G-21: The BAAQMD inquires whether the City considered a goal or target that aligns with the State's objective to be carbon neutral by 2045 pursuant to EO B-55-18.

Response to Comment G-21: As explained on page 28, the 2030 CAP update primarily focuses on reducing GHG emissions by 2020 and 2030. The 2030 CAP Update does not include a goal to achieve carbon neutrality by 2045 because the State has not yet set for the measures or plan for achieving carbon neutrality by 2045. At the City level, based on the baseline and forecasted GHG emissions included in the 2030 CAP Update, achieving carbon neutrality would require substantial, economy-wide, technological advancements that would drastically reduce transportation and natural gas emissions. Such measures would be infeasible at the local level, and very likely be incompatible with federal preemptions pertaining energy standards and interstate commerce. For these reasons, the 2030 CAP Update does not include goal or target for carbon neutrality. The 2030 CAP Update, however, does include multiple strategies related to energy efficiency and retrofitting natural gas appliances. Please see Response to Comment G-5. The City also notes the carbon neutrality goal established by EO B-55-18 explicitly states the goal is in addition to existing State GHG emission reduction goals, including the goals set by EO S-3-05 (to reduce GHG emission 80% below 2050 levels). In addition, as explained in Chapter 6 of the document, the City will update the CAP every five years to ensure the City is on the right track towards addressing climate change and to reflect new technologies, data, and trends in reducing GHG emissions, including technologies and trends pertaining to carbon neutrality.

Comment G-22: The BAAQMD requests clarification on what the orange shading in Figure 6 represents.

Response to Comment G-22: The orange shading in Figure 6 does not represent anything specific. It merely was presented as a background color to show the City's 2030 CAP Update annual GHG emission reduction targets.

Comment G-23: The BAAQMD requests additional information on some of the GHG emissions reductions.

Response to Comment G-232: In regards to the BAAQMD's request for additional information:

- GHG Emission Reduction Measure 3 (Complete Streets): Estimates of GHG emissions reductions associated with GHG Emission Reduction Measure 3 are based on the California Air Pollution Control Officer's Association document *Quantifying GHG Mitigation Measures*. The estimate of reductions is based on the existing intersection density in the City (106 intersections per square mile), which is high, and the percentage of intersections and streets assumed to improved (10 of intersections and 25% of street miles by 2030). Given the City's intersection density, the 2030 CAP Update generally assumes the mid-range of reported effectiveness of complete streets traffic calming and infrastructure improvements.
- GHG Emission Reduction Measure 10 (Construction Best Management Practices): This measure is estimated to apply to approximately 33.5% of the construction equipment included in the off road equipment inventory used to estimate off road emissions in the 2030 CAP Update.
- GHG Emission Reduction Measure 18: The 5% increase in solid waste diversion constitutes nearly 20% of the remaining waste to be diverted from the City (since the baseline emissions assume a 75% waste diversion). Thus, the 5% increase in waste diversion results in an approximately 20% reduction in solid waste

emissions (since it is 1/5th of the amount of waste to be diverted to achieve 100% waste diversion).

Comment G-24: The BAAQMD recommends that GHG Emission Reduction Measures related to energy efficiency should be mandatory, and not voluntary in nature.

Response to Comment: Comment noted. Please see Response to Comments G-5, G-10, and G-21.

Comment G-25: The BAAQMD identifies inconsistent text regarding Peninsula Clean Energy's renewable portfolio and GHG emissions profile.

Response to Comment G-25: Comment noted. The City has clarified text regarding Peninsula Clean Energy's renewable portfolio and GHG emissions profile (see Attachment 2). As explained in GHG Emission Reduction Measure 13, Peninsula Clean Energy has a strategic goal of sourcing 100% GHG emission-free electricity by 2021 and 100% California Renewable Portfolio Standard-eligible electricity by 2025.

Comment G-26: The BAAQMD recommends GHG Emission Reduction Measure 15 be revised to exclude encouraging the installation of tankless natural gas water heaters, and to include an action to work with Peninsula Clean Energy to establish rebate programs for building electrification.

Response to Comment G-26: The City has revised GHG Emission Reduction Measure 15 to reflect the BAAQMD's comments.

Comment G-27: The BAAQMD identifies inconsistent text in Table 36 of the Draft CAP Update.

Response to Comment G-26: The City has corrected inconsistencies regarding the mandatory/voluntary nature of GHG Emission Reduction Measures as identified in Table 36 (see Attachment 2).

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Comment Letter "H"

From: [Jakub Zielkiewicz](#)
To: [MGR-Andrea Pappajohn](#); [MGR-Sigalle Michael](#); [Chris Dugan](#); [Phillip Gleason](#)
Cc: [Abby Young](#); [Axum Teferra](#); [Geraldina Grunbaum](#)
Subject: Burlingame CAP call follow-up
Date: Wednesday, July 3, 2019 12:54:54 PM

All,

Thanks for the call earlier today. I forgot to mention one additional item on the call that's not covered in the comments in the email chain below...

On page 15, there's discussion about large industrial sources. Specifically:

"Large industrial sources are regulated by CARB and are part of California's Cap-and-Trade Program. Since the City does not have control over the emissions from large industrial sources, these emissions are presented for informational purposes only."

I'd encourage you to reframe these statements on industrial sources to show that the city has a willingness to work with industry to reduce emissions. This could be framed as no net GHG increase for future new industrial facilities that require local/regional permitting; working with State (CARB) and regional agencies (BAAQMD/PCE) to reduce existing industrial GHG emissions through Cap-and-Trade, innovative financing/funding mechanisms (i.e., Climate Tech Finance: <http://www.baaqmd.gov/funding-and-incentives/businesses-and-fleets/climate-tech-finance>), potential local incentives from Burlingame/PCE, etc.

Thanks again,

Jakub

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Response to Comments from Jakub Zielkiewicz, BAAQMD

Comment H-1: The BAAQMD recommends the City consider working with large industrial sources to reduce GHG emissions that are not part of the City's GHG emissions inventory.

Response to Comment H-1: The City has revised the 2030 CAP Update to indicate it is willing to work with large industrial sources to reduce emissions when such opportunities become available (see Attachment 2).

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