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Councilmember Pierluigi Oliverio, District 6  
Councilmember Tam Nguyen, District 7  
Councilmember Donald Rocha, District 9  
Councilmember Johnny Khamis, District 10

Dear Michael Brilliot:

RE: Comments and Recommendations on the GHG Strategy/Climate Change in the San José General Plan Update (GP2040 Update)

From: The San Jose/Santa Clara League of Women Voters

Date: April 18, 2016

Thank you for this opportunity to provide input and feedback on the Staff report on the GP2040 Update. We understand that while the current GP2040 Update hearings are closed, additional comments will be considered when the final document goes to Council in the fall. We appreciate the work of staff, the consultants and the Task Force and the preparation of the documents.

We forward these comments at this time in light of recent meetings where Staff recommended no change to GHG Strategy in GP2040. Our careful analysis below respectfully disagrees with this conclusion and we ask consideration of the following comments for re-opening the framework of the GHG Strategy for both format ( need for a stand alone Climate Change Plan) and substantive revisions ( outlining measurable linkages between reductions and policy strategies). In the face of climate change, a revised General Plan together with an executive-summary Climate Action Plan would provide decision-makers and the public with a document and a tool (with estimated metrics) that identifies all city policies and programs that provide climate change benefits to the community.

In summary and as developed in the analysis, which follows: The current GHG Strategy is contained and embedded in the General Plan. While integration is laudable and commendable, the document lacks a clear and concise structural account of the GHG Strategy in GP2040 for combating climate change. The San Jose/Santa Clara League of Women Voters urges that a separate a City of San Jose Climate Change document consistent with the General Plan should be developed, summarizing which elements are forecast to bring about future reductions and which elements will make our community more resilient.

We offer the following comments below for consideration:

#### Background

In 2006, the State of California adopted State Senate Bill AB 32 – the California Global Warming Solutions Act, which requires by law a reduction in greenhouse gas emissions throughout the state to 1990 levels by the year 2020 and to 80% below 1990 levels by the year 2050. In 2007, regulations required potential greenhouse gas emissions created as a result of a project is analyzed during the CEQA review process. In 2010, the Air District released the Air Quality CEQA Guidelines, which outline procedures for evaluating greenhouse gas emissions during the environmental review process. The Guidelines encouraged local jurisdictions to adopt a Greenhouse Gas Reduction Strategy to demonstrate compliance.

In 2011, the City of San José adopted a Greenhouse Gas (GHG) Reduction Strategy in conjunction with the recently adopted Envision San José 2040 General Plan Update consistent with requirements of Assembly Bill 32 (AB32) – the Global Warming Solutions Act of 2006. AB 32 requires the State of California as a whole to reduce GHG emissions to 1990 levels by the year 2020. The Strategy was adopted by the City Council as an appendix to the Envision Plan on November 1, 2011.

The purposes of the City of San José GHG Reduction Strategy are to:

- Capture and consolidate GHG reduction efforts already underway by the City of San José
- Distill policy direction on GHG reduction from the Envision San José 2040 General Plan Update
- Quantify GHG reductions that should result from land use changes incorporated in the Envision General Plan Land Use diagram
- Create a framework for the ongoing monitoring and revision of this GHG Reduction Strategy
- Achieve General Plan-level environmental clearance for future development activities (through the year 2020) occurring within the City of San José

Key elements of urban planning that reduce GHG emissions more directly are building mixed-use housing or “villages” that minimize car travel; building site location that optimizes solar installation potential either for heating water or for electricity generation; planting trees to help mitigate heat island effects; and providing access to safe, pedestrian friendly sidewalks, trails and bike paths, as well as mass transit. Other strategies for combating climate change include increased use of solar power and green energy by homes and businesses.

### Current State

In 2015, the City hired AECOM to prepare an updated greenhouse gas (GHG) emissions inventory for the City of San José that complies with current practice. The posted memorandum presents the updated GHG inventory, City of San José Community-wide Emissions Inventory Memorandum and presents a comparison to the 2008 GHG inventory prepared as part of the Envision San José 2040 update planning process.

The current analysis allows for a sector-by-sector comparison of GHG emissions in 2008 and in 2014. The key finding is that GHG emissions have decreased by approximately 2% community-wide since 2008.

Staff presents this information contained in the City of San José Community-wide Emissions Inventory Memorandum as indicating the City has been able to accommodate residential and employment growth more efficiently, with fewer emissions generated per unit of growth. Again, staff and the consultants use this information in reviewing the City’s progress in reducing GHG emissions that the City is on track to meet the City’s and the State’s GHG emission reduction target for 2020.

AECOM has presented their findings from their “Community-wide Emissions Inventory Memorandum” memo at the April 7, 2016 Task Force meeting. Staff is not recommending any General Plan policy changes as an outcome of the updated GHG inventory.

### San Jose /Santa Clara League of Women Voters Comments and Recommendations

The City of San José Community-wide Emissions Inventory Memorandum is comprehensive in terms of utilizing the basic format and extracting data from many sources.

The Consultants present information and conclusions indicating a 2% reduction and hypothesize that the 2020 goals will be met under the present level of effort. The City of San José Greenhouse Gas Reduction Strategy is not presented in terms of how components of the Strategy contribute to and are responsible for the 2% reduction and how going forward further reductions will be accomplished.

In addition to the Greenhouse Gas Reduction Strategy, the City has adopted its own leadership goals, the Green Vision Plan, for a green future. The Consultants present no information on the GHG emission-related goals of the City of San Jose Green Vision, a Council–adopted document with important mutually reinforcing objectives.

Going forward and without modifications, the General Plan is difficult to follow in terms of which components are targeted at greenhouse gas reductions and making impactful local advances on preparing for and positioning the City for doing its part on climate change.

The Strategy is embedded in the General Plan and while integration is laudable and commendable, the San Jose/Santa Clara League of Women Voters urges that a separate document consistent with and summarized from the General Plan should be developed, summarizing which elements are forecast to bring about future reductions. The subset and implicit goals by sector and strategy should be set up in a transparent and easy-to-follow manner that allows City staff and the public to track and take steps to achieve.

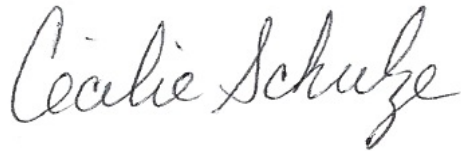
In the information presented, the Green Vision goals are not commented on or analyzed in the Consultant report. City staff should be directed to prepare a report that presents how the current inventory trajectory interacts with projections for a greener future under the many City of San José adopted goals and Council-approved programs.

The City of San José is now moving forward on greenhouse gas reductions under Community Choice (supported by the SJ/SC LWV and many other organizations) and with other climate change strategies. These strategies are not discussed and the absence creates a void of useful information.

For example, inventory fails to discuss greenhouse gas capture through sequestration linked to retention and expansion of open space. These contributions should not be ignored. Sea level rise under climate change is not commented on and so there is no summary of strategies to reduce threats from this aspect of climate change. Given the urgency and crisis forecast for climate change, San José City Council should discuss whether the current progress toward reducing its impact on climate change is sufficient and adequate given the science of understanding since the 2020 goals were established.

We appreciate your full review of the League's concerns. If you have comments or questions, we would be happy to address those.

Sincerely,



Cecilie Schulze  
President, League of Women Voters San Jose/Santa Clara



Rita Norton  
Chair, Climate Change Committee, League of Women Voters San Jose/Santa Clara

CC-City Clerk and distribution to: Norberto Dueñas, City Manager, Harry Freitas, Planning Director, Envision 2040 General Plan Update Task Force Members