Tammy Cloud-McMinn

From: Diane Nygaard <dnygaard3@gmail.com>
Sent: Tuesday, July 14, 2020 4:06 AM
To: City Clerk
Cc: Council Internet Email
Subject: Comments on # 17- CAP Amendment # 1

All Receive - Agenda Item # 17
For the Information of the:
CITY COUNCIL
Date 7/14 CA ✓ CC ✓
CM ✓ ACM ✓ DCM (3) ✓

Honorable Mayor and City Council

We believe you are committed to a Climate Action Plan that complies with state law.and actually reduces Carbsbad's greenhouse gasses (GHG). But for those of us who have been working on these issues for many years this CAP Amendment is very concerning. In January staff acknowledged a major error in the original CAP computations for Vehicle Miles traveled (VMT). This amendment is intended to correct that error, and make other changes to reflect current methods of computing GHG inventory and reduction measures. The magnitude of these changes now makes any historical comparison invalid, and leaves us at risk of other computational errors going forward. The bottom line is any meaningful analysis of actual results remains problematic at best, and is still years in the future.

It is 5 years since the original CAP was adopted and we still have no way of answering the critical question- Are GHG emissions declining in Carlsbad?

The following highlights a few of our concerns:
Note- numbers in ( ) refer to Agenda Packet electronic page number

- No clear explanation for the changes on Table 2-2 Community GHG Emissions (489 and 493)

The total emissions increased by over 38% from 705,744 to 977,000 MT - with increases in all sectors except wastewater water which went down by over 50%. There is no way to verify the numbers that are shown- and they are critical as they establish the baseline.

Recommendation : Add a technical appendix that shows all of the source data and computations so these can be verified and replicated over time. This is especially important given the major error that occurred with the original CAP.

- This VMT data is not consistent with the latest data from SANDAG
(489- Note the referenced Appendix B-1 is not included)

This amendment is now based on 2012 data, but SANDAG has posted 2016 data. Furthermore the SANDAG data shows increases in regional VMT /capita and VMT/employee between 2012 and 2016 yet the CAP assumes VMT in Carlsbad is declining. We checked several of the census tracts in Carlsbad, and all showed a VMT increase between 2012 and 2016.

sandag.maps.arcgis.com/apps/webappviewer/index.html?id=5b4af92bc0dd4b7babbce21a7423402a

Recommendation : The most current SANDAG data should be used- and if there is a discrepancy it should be explained.

- 2020 GHG reductions from General Plan have all been deleted (532)

The original CAP on Table 3-2 identified several GHG reductions from General Plan Policies and Actions . These included bikeway, pedestrian, traffic calming, parking and transportation improvements. These now have 0 GHG reductions for

2020. Does this mean less has been done than was assumed when the CAP was adopted in 2015- or is this just another "computational" error?

- Actions do not support the TDM goal of a 10% increase in alternative transportation to a total of 32% use . (551)

A goal is meaningless unless it is supported by actions that have a reasonable chance of achieving it. The new, detailed computations of changes identify the following reductions potentially related to alternative transportation by 2035:

Bikeways	.07 % reduction in VMT	(524)
Connectivity and Pedestrian improvements	1.00 %	(526)
Traffic calming	.25	
Transportation	.63	(531)
Parking policies	2.00	(529)
Total	3.95 %	

There is nothing that explains how this minimal reduction in VMT could result in such a dramatic increase in the use of alternative transportation. Parking is the action with the greatest reduction and that seems questionable given the recent Planning Commission approval of the Carlsbad Corporate Plaza Parking Structure on 6/3/20 with no VMT analysis and that is not consistent with the General Plan parking policies.

Also note that the emission reductions for Transportation increased from 1,327 to 2,085 MT (532) yet there is no change in the detailed computations for this measure (531). This is an obvious error.

This CAP amendment fails to provide essential information to ensure that you, or the general public, have any assurances that GHG will be reduced in your city.

Diane Nygaard
On behalf of Preserve Calavera

CAUTION: *Do not open attachments or click on links unless you recognize the sender and know the content is safe.*

Tammy Cloud-McMinn

From: Sheila Cobian
Sent: Tuesday, July 14, 2020 10:24 AM
To: Paz Gomez
Cc: Geoff Patnoe; Tammy Cloud-McMinn; Faviola Medina
Subject: RE: Amendment 1 to CAP

All Receive - Agenda Item # 17
For the Information of the:
CITY COUNCIL
Date 7/14 CA ✓ CC ✓
CM ✓ ACM ✓ DCM (3) ✓

We will distribute as correspondence received as of today.

From: Paz Gomez
Sent: Monday, July 13, 2020 5:35 PM
To: Scott Chadwick <scott.chadwick@carlsbadca.gov>; Celia Brewer <Celia.Brewer@carlsbadca.gov>; Geoff Patnoe <Geoff.Patnoe@carlsbadca.gov>; Cindie McMahon <Cindie.McMahon@carlsbadca.gov>; Robby Contreras <Robby.Contreras@carlsbadca.gov>; Gary Barberio <Gary.Barberio@carlsbadca.gov>; Jeff Murphy <Jeff.Murphy@carlsbadca.gov>; Don Neu <Don.Neu@carlsbadca.gov>; Jason Haber <Jason.Haber@carlsbadca.gov>; Sheila Cobian <Sheila.Cobian@carlsbadca.gov>
Subject: FW: Amendment 1 to CAP

FYI

From: James Wood
Sent: Monday, July 13, 2020 5:28 PM
To: Paz Gomez <Paz.Gomez@carlsbadca.gov>
Subject: FW: Amendment 1 to CAP

Hi Paz,

Below is Mike's email response to the Sierra Club related to tomorrow's CAP Amendment item.

Thanks,
Jamie

From: Mike Grim
Sent: Thursday, July 9, 2020 3:05 PM
To: Paige DeCino <pdecino@hotmail.com>
Cc: Simon Freedman <simonf@roadrunner.com>; Mike McMahon <2mmcmahon@gmail.com>; James Wood <James.Wood@carlsbadca.gov>
Subject: RE: Amendment 1 to CAP

Hi Paige,

Thanks for your email and, as always, I'm happy to answer any questions you and/or others may have. Responses to your listed items are below in green. We requested EPIC provide more data regarding the calculation of the CCE emissions reductions and will forward that to you as soon as it's received. I thought it best to send the remaining information since it was available. If you haven't already explored it, the SANDAG Regional Action Planning Framework (ReCAP) provides a lot of detail on how inventories (Technical Appendix

I) and emissions reductions (Technical Appendix II) are calculated. EPIC used these methodologies in preparing its report (Appendix B-1 of the proposed CAP).

The VMT calculation error, and its resulting impact on the CAP, is documented in previous staff reports. For a perspective on the approximate magnitude of the error, you can compare the VMT in Appendices B-1 and B-2 of the existing CAP. Appendix B-1 is the original ICLEI 2005 GHG inventory and Appendix B-2 contains the Dyett & Bhatia 2005 and 2011 inventories. Please be aware that the ICLEI 2005 VMT was calculated using an older methodology so the numbers are not directly comparable. A discussion of the evolution of the CARB Scoping Plan guidance is contained in Section 3.1 of the proposed CAP amendment.

The Environmental Management Department is currently working with Planning Division to analyze the potential GHG emissions impacts related to the General Plan Housing Element update. We have yet to determine the level to which additional programmatic CAP measures will be needed. I have already been in communication with Simon about his EV proposal. If you would like, we can meet to discuss that and any other measures you would be interested in the city exploring. At that meeting, or on another occasion, we could meet with EPIC to discuss in more detail the derivation of the inventories and emission reduction projections. That way you can ask them questions directly in real time. Please let me know if you're interested in meeting about these or other CAP-related topics and who would like to attend, and I can send out a meeting availability poll.

Thanks again,

Mike

City of Carlsbad
Environmental Management
Mike Grim, Senior Programs Manager
City of Carlsbad
1635 Faraday Avenue
Carlsbad, CA 92008
www.carlsbadca.gov

P: 760-602-4623
F: 760-602-8562
mike.grim@carlsbadca.gov

Please consider the environment before printing this e-mail.

From: Paige DeCino <pdecino@hotmail.com>
Sent: Saturday, July 04, 2020 12:35 PM
To: Mike Grim <Mike.Grim@carlsbadca.gov>
Cc: Simon Freedman <simonf@roadrunner.com>; Mike McMahon <2mmcmahon@gmail.com>
Subject: Amendment 1 to CAP

Dear Mike,

In preparation for the council meeting on July 14 to amend the Climate Action Plan to include Community Choice Energy, our Carlsbad Sierra Club My Gen team is hoping you'll consider some of the points we asked for in our original public comments listed below from the May 12 council meeting which are not clear in the revised plan in addition to a few more issues. Quite frankly, the information at this (May 12) meeting was no more elucidating than the original Jan. 21, 2020 meeting so we're hoping you'll provide more details during this upcoming meeting.

The Jan. 13, 2020 letter from the city attorney to the city manager points out "the CAP's VMT calculation is based on an incorrect input, which resulted in a **materially understated** (*emphasis added*) greenhouse gas (GHG) inventory and GHG targets."[1] We interpret this as a major problem with the GHG inventories for our CAP. Given our confusion between the original 2015 CAP and the amended 2020 CAP, we suggest that within the Introduction of the revised CAP, a paragraph be included explaining the VMT problem (either in 1.1 Introduction or 1.5 under 'How this plan was prepared') and that the CA Air Resources Board (CARB) has changed how 2020 and 2035 targets are calculated.

At a minimum, and in the interests of full government transparency, all calculations that support Carlsbad meeting its 2020 GHG targets should be made public. It would be most helpful if for 2012, 2014, and 2016 inventories, a breakdown by sector could be provided so progress in each sector could be assessed.

While we join Staff in recommending the City add a CCE to the CAP, it is unclear the savings in GHG emissions we can expect from the Clean Energy Alliance. The EPIC report did not address this additional measure.

In preparation for your upcoming council meeting our team requests that the following be provided or carried out:

- Since the 2012 Community GHG emission-by-category table and figure in chapter 2 is our baseline, please provide the same breakdown for the following years, 2014 and 2016, to show the progression of emission reductions. (See EPIC April 2020 Amendment 1 graph and table) A summary of the GHG emissions-by-category, along with a bar graph indicating their percentages, is contained on page 3 of Appendix B-1 (EPIC's April 2020 report).
- In Table 3-1, correct the 2020 and 2035 targets which appear to be off slightly per the CARB guidelines. Tables 3-1 and 4-2 have been corrected to show the 2020 target as 937,920 and 2035 target as 468,960.
- Clarify (sec. 3.2) how the desalinization plant emissions are accounted for as we can find no mention of the plant in the amended CAP. The GHG emissions from the desalination plant's energy consumption, which began operation in Dec. 2015, are included in the 2016 inventory's community-wide electricity consumption and resulting GHG emissions. Privacy rules by the CPUC do not allow the city to receive

disaggregated data, therefore the exact consumption of any customer, including desalination plant, is not known.

- Provide the calculations showing the 56,000 MTCO2 savings from CEA; it's not clear from the feasibility study where this number came from. The feasibility study was used to choose which CCE scenario would be modeled for the CAP measure. The GHG reduction calculations were derived using the EPIC GHG model and involve interactions with other CAP measures (i.e. they are not simply the difference between SDG&E's and CCE emissions factors). EPIC is preparing a table to show these considerations, which will be provided to you upon completion. Please also note that the proposed Clean Electricity Measure P contains an action to explore the purchase of renewable energy credits if CCE is not reaching the 2035 goal.
- Quantitate the effectiveness of the CAP actions taken to date. For 2035 targets many of the numbers depend upon "encourage" or "promote" strategies (D-G, K, O). To the extent this is feasible, the CAP Annual Report includes this data. For CAP measures that rely upon energy consumption data (e.g. Measure 50% reduction energy reduction in 30% of households), calculating the progress in reaching the goal requires data from SDG&E. The most recent data from SDG&E (2018) was just received and will be included in the Reporting Year 4 Annual Report. We need to know how effective existing strategies are. We would also encourage aggressive outreach sooner than later. While the titles of Measures D, E, F and K use the words "encourage" or "promote," the actions contained in the Measure include implementation of the CAP ordinances, in addition to the promotional and educational actions. The effectiveness of each measure is gauged by the progress in reaching the overall goal for the respective Measure. Note: Measure G is deleted in this amendment (see page 4-7).
- Prioritize an entire CAP update as soon as possible. City staff is prepared to recommend a comprehensive CAP update once budget is available. If possible, this issue will be revisited later during this fiscal year.

[1]https://www.carlsbadca.gov/civicax/filebank/blobdload.aspx?BlobID=40742, includes letter from city attorney to city manager, pages 4-8.

On behalf of the Carlsbad My Gen Sierra Club team,
Paige DeCino, Mike McMahon, Simon Freedman

CAUTION: *Do not open attachments or click on links unless you recognize the sender and know the content is safe.*