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June 6, 2012

To: James David, Associate Planner
Kim Murry, Deputy Director Long Range Planning

From: Andrew Christie, Chapter Director, Sierra Club Santa Lucia Chapter

Re: June 13 Planning Commission meeting, Item 2. GPI 71-09: Continued consideration of the Draft Climate Action Plan

We have comments on the draft Climate Action Plan in two areas, concerning elements that it does and does not include.

Renewable Energy

In the Renewable Energy Strategies section of the SLO CAP at “RE 2: Renewable Energy Incentives and outreach,” we recommend inclusion of a study of the feasibility of Community Choice Aggregation (CCA) and a feed-in tariff (FIT). Both are included in Chapter 5, “Community Greenhouse Gas Reduction Measures,” of the County’s EnergyWise (Climate Action) Plan. “CCA” appears in the list of acronyms at the beginning of the City’s revised draft CAP, but not in the body of the text.

As far as renewable energy incentives go, former SLO County Planning Director (now Marin County Director of Community Development) Alex Hinds, when spoke at a 2007 energy planning conference at Cal Poly, called “CCA the most promising thing we have to really increase our use of renewables in Marin.” This was one of the various workshops, town halls, planning conferences and energy summits held around the county over the past five years, sponsored variously by the Strategic Energy Alliance for Change, SLOCOG, APCD and the Sierra Club, at which CCA was a central topic. A Community Choice program was one of the recommendations made to the County by the Local Government Commission in its 2010 report on priority climate change adaptation measures for San Luis Obispo.

Thanks to its CCA program, Marin County has reduced its annual greenhouse gas emissions by 70,000 tons and exceeded the state requirement to procure 20 percent renewable energy. It now delivers 27% of all energy delivered to participating residents from renewable sources.

California communities that are considering Community Choice programs of their own include Chula Vista, the city of Richmond, the city of San Jose, the city and county of San Francisco, Humboldt County, the King River Conservation District, Monterey County, Santa Cruz County, Solano County, Sonoma County and Yolo County.

Just as you did in researching and reworking BLD 1 to reflect the language used in the County's EnergyWise plan, we feel it would be even more advantageous for the City to include language on CCA and FIT that complements the provisions in the County Plan. ("Evaluate a local feed-in tariff for renewable energy distributed generation. Evaluate the development of a Community Choice Aggregation program with the incorporated cities in San Luis Obispo County to procure up to 50% of the region's electricity use from renewable resources by 2020.") This would lay the groundwork for the aggregation of purchasing power by the City and County to achieve the economic and environmental benefits of purchasing and/or generating their own electricity. A study of Bay Area communities found they could save an additional 34% on their existing electricity rates by forming a single CCA program instead of individual programs.

We recommend that the City import from the County's Conservation and Open Space Element implementation strategy E.1.2.1 the procedure for evaluation of Community Choice.* The Sierra Club is prepared to assist in that evaluation. Some of the foremost experts on the subject sit on Sierra Club California's climate and energy committee and CCA subcommittee. We can make that expertise available to you at no charge.

Parks & Open Space

In this chapter, we recommend refining the language and the definition of terms used in regard to greenhouse gas emissions from parks and open space. ("While the maintenance of Parks & Open Space areas generates GHG emissions, these areas also have the potential to directly reduce emissions through carbon sequestration; trees, plants and soils absorbing carbon.")

Parks are indeed GHG emitters, via their requirement to serve active recreation -- lighting, water, mowers, trimmers, leaf blowers, etc. This does not apply to open space. As noted on page 42, open space "restored as brush or oak woodland habitats...provide carbon sequestration benefits to the community." Parks provide some of this benefit while also emitting GHGs; open space serves entirely as a carbon sequestration benefit, not an emitter. For this reason, these two categories should not be conflated. The clear distinction between parks and open space as described in the City's Open Space Ordinance should be reflected in the text for this chapter and broken out in the implementation strategies proposed to reduce GHG emissions in this category by -1,700 MTC02e.

Sincerely,



Andrew Christie
Chapter Director

* "Determine if Community Choice Aggregation (CCA) or a similar program is a cost-effective and low-risk strategy to increase use of renewable energy, and realize a low-carbon, local energy portfolio. Evaluate CCA for the ability to develop local energy resources that can feasibly supply heat and electricity to the county; determine the financial framework that provides the lowest cost funding for this portfolio; take actions necessary to provide access to the funding; and create public-private partnerships to construct, operate and maintain the new energy resources as public works projects."