



SIERRA
CLUB
FOUNDED 1892

Santa Lucia Chapter
P.O. Box 15755
San Luis Obispo, CA 93406
(805) 543-8717
www.santalucia.sierraclub.org

October 21, 2013

Via e-mail and FAX

To: The Paso Robles Planning Commission

Re: 10/22/13 meeting, item 2: approval of a Negative Declaration for the Draft Qualified Climate Action Plan

We urge the Commission not to recommending approval of the Negative Declaration, which would constitute a formal finding that the project will not have a significant adverse effect per CEQA Guidelines, Section 15071.

Approval should be withheld on the basis of this discussion of the Governor's Executive Order S-3-05, which appears at I-3: GHG Emissions Inventory and CAP Updates:

“At this time, the State has not created a mandate for further reductions beyond the 2020 target. It has identified a long-term goal for State agencies of reducing emissions to 80 percent below 1990 emissions levels by 2050 (in Executive Order S-3-05), but has not adopted the target and does not plan for meeting this goal. As such, this CAP does not identify a target beyond 2020.”

The courts have rejected this argument as a rationale for not identifying GHG reduction targets beyond 2020 and failing to fulfill Executive Order S-3-05, as doing so constitutes a decision to ignore State policy and a failure to provide the public with adequate information about potential environmental impacts. The Climate Action Plan's proposed GHG emission reductions must show how Paso Robles will reduce its emissions 80 percent below 1990 emissions levels by 2050, not just the 2020 target, in order to be consistent with Executive Order S-3-05.

In revising the draft Climate Action Plan to achieve compliance with CEQA, the City may find that it needs to adopt additional GHG reduction measures. Community Choice Aggregation (CCA), a measure offered in the Central Coast GHG Planning Measure Evaluation Toolbox, can achieve substantial emission reductions.

This is the text adopted by the County and City of San Luis Obispo, respectively, in their Climate Action Plans:

- The County shall “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.”

- The City shall “Evaluate the feasibility of a regional Community Choice Aggregation program to procure electricity from renewable resources.”

In adopting similar language, Paso Robles would be well positioned to take advantage of significant future opportunities to secure the environmental and economic benefits of a CCA program and meet the requirement of the State of California for substantial GHG reductions through 2050.

Thank you for your attention to these matters,

A handwritten signature in cursive script, appearing to read "Andrew Christie".

Andrew Christie, Director
Santa Lucia Chapter