

CITY OF PETALUMA

MEMORANDUM

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SUBJECT: CEQA Exemption Justification for the Blueprint for Climate Action

The City of Petaluma is proposing to adopt the Blueprint for Climate Action (the Blueprint) which will serve as the City's Climate Action Plan to reduce greenhouse gas emissions in order to combat global climate change. The Blueprint includes seven action plans and 33 cornerstone actions that will lead Petaluma on a path toward carbon neutrality. Adoption of the Blueprint is a discretionary action, subject to compliance with the California Environmental Quality Act (CEQA), and this memo provides a CEQA determination for its adoption and implementation.

As documented herein, the proposed Blueprint is exempt under the following provisions of the California Environmental Quality Act (CEQA) Guidelines:

15307. Actions by Regulatory Agencies for Protection of Natural Resources

15308. Actions by Regulatory Agencies for Protection of the Environment

Background

The City of Petaluma is already experiencing the effects of a changing climate. Both gradual climate change (e.g., sea level rise) and climate hazard events (e.g., extreme heat days) expose people, infrastructure, buildings and properties, and ecosystems to a wide range of potential impacts including public health and safety. These impacts disproportionately affect the most sensitive populations in the city, including children and elderly adults, low-income populations, renters, immigrants, black, indigenous, and people of color (BIPOC) residents, among others.

In 2019, the City Council adopted the Climate Emergency Framework, acknowledging the risks associated with the changing climate, and recognizing the role of human activity in generating greenhouse gas emissions and contributing to climate change. The City Council decided to take bold action and commit to becoming carbon neutral by 2030. The Climate Emergency Framework is divided into four sections that cover Equity and Climate Justice, Mitigation and Sequestration, Adaptation and Social Resilience, and Community Engagement. Section 2: Mitigation and Sequestration of the Climate Emergency Framework sets a goal for the City to develop a Climate Action Plan outlining the actions the City will take to achieve its climate goals. The Blueprint is intended to meet this goal and provide a pathway toward carbon neutrality.

As noted in the Blueprint, the City of Petaluma's total 2018 GHG emissions are estimated to be 472,422 Metric Tons of Carbon Dioxide Equivalent (MTCO₂e), an increase of 12,067 MTCO₂e from the 2010 baseline year. Of the five sectors, on-road transportation accounted for the largest amount of GHG emissions, with estimated emissions of 314,493 MTCO₂e, or 67% of total emissions. The second largest sector was residential energy use, with estimated emissions of 60,409 MTCO₂e, or 13% of total emissions. The remaining 20% of emissions were made up of nonresidential energy, solid waste, off-road transportation, and water and wastewater.

In 2020, the City Council contracted with Raimi + Associates to develop a climate action plan to help the City achieve its goal of becoming carbon neutral. The outcome of that effort is the draft Blueprint for Climate Action.

Proposed Blueprint for Climate Action (Project Description)

The purpose of the Blueprint for Climate Action (Blueprint) is to provide a comprehensive approach to reaching the City's goal of carbon neutrality. However, because of factors outside of the City's control, the draft Blueprint will lead to an estimated 60% reduction in Petaluma's Greenhouse Gas emissions by 2030. The Blueprint is divided into seven action plans that address specific emissions and sequestration sectors including the following:

Clean Energy Action Plan

The Clean Energy Action Plan includes seven actions that will transition Petaluma to a resilient and fossil-free energy system that reduces greenhouse gas emissions and improves local air quality and public health. These include addressing barriers to renewable energy, phasing out gas-powered lawn and garden equipment, and increasing local renewable energy generation.

Building Action Plan

The Building Action Plan contains both a new building strategy and an existing building strategy. The intent of the New Buildings Strategy is to decarbonize new construction through low embodied carbon materials, renewable energy, and efficient design in new construction. The Existing Building Strategy includes actions to improve and decarbonize existing buildings by transitioning from gas to electric heating and retrofitting buildings with new energy efficient windows.

Transportation and Land Use Action Plan

The Transportation and Land Use Action Plan consists of several strategies: Transportation and Land Use Coordination Strategy; Transportation Demand Management Strategy; Parking Management Strategy; Active Transportation and Complete Streets Strategy; Transit Service Strategy; and Vehicle Electrification and Electric Mobility Strategy. The Intent of the Transportation and Land Use Action Plan is to advance greenhouse gas reduction targets by focusing development in location-efficient places, creating complete neighborhoods, increasing density, and reducing the amount of driving by using roadway and parking pricing.

Water Action Plan

The intent of the four actions in the Water Action Plan and Water Strategy are to achieve the most efficient water use possible in Petaluma to ensure a safe and resilient water supply while providing important habitat, water quality, stormwater capture, and other environmental benefits. The

strategy aims to reduce indoor and outdoor water use by providing alternative sources of water, including recycled water and greywater in line with the Urban Water Management Plan, evaluating CALGreen Tier 2 water efficiency requirements for alterations, additions, and remodels, and promoting existing rebate programs.

Resource Consumption Plan

The Resource Consumption Plan aims to reduce overall resource demand, shift demand to lower-resource alternatives, and lower the material inputs for resources consumed. This plan couples' traditional municipal roles like solid waste diversion with emerging roles like facilitating a sharing economy which might include a bike or car share to reduce the consumption of goods. The Solid Waste Diversion Strategy focuses on the diversion of organics from landfills in accordance with State targets and reduces GHGs related to the generation and decomposition of waste.

Additionally, the Resource Consumption Plan includes the Local Food System and Grocery Strategy, which identifies actions aimed at reducing consumption-based emissions through local food system improvements and support. Similarly, the Goods and Services Strategy is aimed at reducing emissions through encouraging behavior changes around purchasing and waste.

Natural Systems and Sequestration Action Plan

This action plan focuses on the management of lands to not only reduce emissions, but also sequester carbon. It includes an Urban Forestry Strategy that is intended to increase tree canopy coverage, as well as an Open Space Management Strategy that focuses on managing open space, agricultural areas, and green spaces to increase carbon sequestration, habitat connectivity, and public access to nature.

Additionally, the Climate Smart Working Land Strategy, presented in this Plan, includes actions to promote using working lands as sinks for carbon sequestration, and the City Landscape Management Strategy includes actions that the City can take to increase carbon sequestration and soil quality in City Parks and other open space.

Carbon Neutral Municipal Operations Plan

The Carbon Neutral Municipal Operations Plan focuses on actions the City and its employees can take to reduce emissions and demonstrate leadership in taking action on reducing emissions. This Action Plan includes two components; 1) strategies related to city staffing, training, and reporting and monitoring, and 2) strategies related to facility energy efficiency and electrification, Zero Emission Vehicle Fleet strategies, and a transportation demand management strategy for City staff.

Review for Exemption(s)

The proposed adoption and implementation of the Blueprint was reviewed for eligibility for the following CEQA categorical exemptions:

15307 Actions by Regulatory Agencies for Protection of Natural Resources

Class 7 consists of actions taken by regulatory agencies as authorized by state law or local ordinance to assure the maintenance, restoration, or enhancement of a natural resource where the regulatory process involves procedures for protection of the environment.

15308 Actions by Regulatory Agencies for Protection of the Environment

Class 8 consists of actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.

Exemption Justification

The Blueprint includes 33 cornerstone actions that have been identified as having the greatest impact on reducing greenhouse gas emissions (GHGs) in Petaluma. Through implementation of the Blueprint, it is estimated that Petaluma can reduce GHGs by up to 60% by 2030. However, the Blueprint is a guiding policy document. The Blueprint in and of itself will not result in any physical changes to the land and will not result in new construction or the lessening of environmental regulations. Rather, it calls for additional policies, ordinances, plans, and actions to be implemented in order to realize GHG reductions. These additional actions are discretionary and will be subject to independent environmental review at the time they are enacted and are intended to realize the City's commitment to climate resiliency.

For example, the Urban Forestry Strategy calls for the development and implementation of an urban forestry management plan which would be subject to review under CEQA. Additionally, the Transportation and Land Use Coordination Strategy calls for an update to the General Plan and Zoning Ordinance which will also be required to undergo CEQA review.

Another example includes the Carbon Neutral Asset and Facility Management Action Plan which calls for the alignment of the City's Capital Improvement Plan with decarbonization goals and outlines a process the City can utilize to achieve carbon neutrality through asset and facilities management. These actions include facility audits and electrification.

The Blueprint also involves many actions around education, public outreach, and encouraging behavior change, as well as monitoring and reporting. These activities are intended to reduce GHGs in order to protect natural resources and the environment and would not result in the lessening of regulations or result in construction.

Some specific actions are identified including the following examples:

- Phasing out gas-powered lawn and garden equipment and banning gas-powered lawn and garden equipment for City operations

Phasing out gas-powered lawn and garden equipment entails the replacement of gas-powered equipment with electric/battery powered equipment when the useful life of the equipment has expired (ie the equipment is broken or no longer operates efficiently). Because gas-powered equipment has higher emissions than electric, this action ensures that the new lawn/garden equipment will have significantly lower emissions.

- Continue to upgrade and improve Petaluma Transit infrastructure including benches, bike racks, ADA improvements, shelters, real-time signage consistent with Petaluma Transit's plans

Transit infrastructure improvements are intended to encourage and accommodate an increase in ridership to reduce individual vehicle travel. By improving ease of use and access to transit, the action will help reduce single occupancy vehicle travel. Because single occupancy vehicles are the greatest source of emissions in Petaluma, increasing transit ridership will reduce emissions. Therefore, this action will help reduce greenhouse gas emissions.

- Collaborate with ReLeaf Petaluma to support their 10,000 trees program, including potential fee reductions or water bill credits, if feasible

Through their natural processes, trees sequester carbon dioxide which is one of the largest sources of greenhouse gases. By increasing the tree canopy and planting more trees, more carbon is taken out of the atmosphere and emissions are counteracted. Additionally, more shade in the City reduces the urban heat island effect reducing the need for mechanical cooling. Therefore, this action reduces greenhouse gas emissions and fights global climate change.

- Require new development to create an Integrated Pest Management Plan and provide templates for HOAs and the public (By January 1, 2026).

Integrated Pest Management (IPM) reduces the use of pesticides in landscaping. Both the production and application of pesticides can result in greenhouse gas emissions and can expose residents to potentially harmful chemicals. Through the use of IPM, less chemicals are used on landscaping and fewer people are exposed to potentially harmful chemicals and emissions may be reduced.

- Establish a community compost and mulch pick-up program for regional compost.

Organic materials including kitchen scraps and yard waste end up in landfills and result in the release of methane which is a greenhouse gas. Mulch and compost programs help to divert organic materials from landfills and convert them into composted materials that can be used for soil amendments and other forms of carbon sequestration. Therefore, the implementation of this action will result in the reduction of greenhouse gas emissions and combat global climate change.

- Electrification of the transit fleet

As noted above, power sourced from electricity produces less greenhouse gas emissions than power produced from gasoline and fossil fuels. Therefore, electrification of the transit fleet, the City would reduce greenhouse gas emissions.

- Expand and promote an electric vehicle motor pool

As noted, by transitioning from gasoline powered vehicles to a lower emission source, such as electricity, the City will reduce its greenhouse gas emissions.

The specific actions identified within the Blueprint sequester carbon by planting trees, reduce methane gas emissions from landfills by diverting waste to compost facilities, and reduce transportation and equipment emissions by transitioning from gasoline power to electric sources which have a lower carbon footprint. As such, the specific actions identified in the Blueprint will reduce GHGs and protect natural resources and the environment. Therefore, the Blueprint for Climate Action qualifies for the exemption under both Class 7 and Class 8.

15300.2 Exceptions to Exemptions

The project was reviewed to determine if there were any exceptions to the exemptions as described in CEQA Guidelines 15300.2.

a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant.

The project does not fall under the applicable classes and therefore, this exception does not apply.

b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The Blueprint for Climate Action is Citywide and outlines a strategy aimed at reducing GHGs in order to protect natural resources and the environment. Implementation of the Blueprint will create policies and ordinances that will encourage existing and require future developments proposed in the City to adhere to policies that will reduce emissions. Therefore, the project would not result in an adverse cumulative impact from successive projects of the same type in the same place.

c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The proposed project does not include any physical changes to any locations of the City, but rather, sets policies, strategies, and actions to reduce greenhouse gas emissions. Therefore, there are no potential impacts to the environment through unusual circumstances and this exception does not apply to the project.

d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The proposed project does not include any physical changes to any locations of the City, but rather, sets policies, strategies, and actions to reduce greenhouse gas emissions. Therefore, there are no potential impacts to scenic highways and this exception does not apply to the project.

e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The proposed project does not include any physical changes to any locations of the City, but rather, sets policies, strategies, and actions to reduce greenhouse gas emissions and this exception does not apply to the project.

f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The project sets citywide policy for reducing greenhouse gas emissions and does not include any specific projects that would result in physical changes. Therefore, the project would not impact historic resources and this exception does not apply to the project.

As none of the above exceptions apply, the project is found to be exempt under CEQA Guidelines 15307 and 15308.