



Sierra Club Loma Prieta Chapter

Celebrating 80 years of protecting the planet

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City of Milpitas
455 E. Calaveras Boulevard
Milpitas, CA 95035

Re: Comments on the Draft Climate Action Plan (CAP) for Milpitas

Honorable Mayor and City Council, Planning Commission, and Mr. Sheldon Ah Sing,

The Sierra Club Loma Prieta Chapter appreciates the substantial effort and clear purpose evident in the proposed Climate Action Plan (CAP). Given our present circumstances – global warming accelerating faster than scientists predicted – the Sierra Club supports your efforts at emission reductions by offering three categories of comments: 1) Outstanding Policies, 2) Supported Policies and Suggestions, and 3) Areas of Concern with Recommendations.

Thank you for considering our recommendations. We hope that by working together, Milpitas can meet, and even exceed, its goals.

1. Outstanding Policies

- a. We are happy to see that the City of Milpitas is promoting **distributed, renewable energy generation** specifically, “through Goal 3, the City will reduce GHG emissions from traditional electricity production and natural gas by promoting the production of local, on-site renewable energy for both residential and nonresidential uses.”
- b. Studies have found that **unbundling parking costs** makes a big difference in people's transportation choices. So, we are pleased to see MEASURE 9.1: Unbundle Parking Costs with the following language: “Revise development standards to separate parking costs from the cost to rent, purchase, or lease residential and nonresidential buildings to incentivize use of alternative transportation modes.”
- c. Achieving the necessary CO₂ reductions by 2035 will require a dramatic shift away from fossil-fueled vehicles to clean vehicles. So, we applaud GOAL 10: **Provide and Support expansion of infrastructure for low-emitting and fuel-efficient vehicles.**
- d. We applaud MEASURE 10.5: **Gas Tax** and encourage the City of Milpitas to implement this promptly without awaiting regional and state efforts. A one- or two-percent carbon tax could be implemented without significantly affecting local gasoline sales, but it would send a pricing signal to consumers that a long-delayed carbon tax had arrived. Such a carbon tax could be extended to natural gas used in homes and businesses. We fully concur with the proposal to use the tax “to create funding to provide rebates for clean fuel infrastructure and/or vehicles in Milpitas.”

- e. **BART Station Pedestrian Circulator.** With the highly successful demonstrations of Personal Rapid Transit (PRT) at Heathrow Airport, Masdar in Abu Dhabi, and in Sweden, now is the time to consider use of the technology in the United States. Therefore, we urge Milpitas to accelerate MEASURE 10.6: BART STATION PEDESTRIAN CIRCULATOR with an emphasis on using advanced transit technology when staff studies “the feasibility of a pedestrian circulator around the BART station.” The financial argument for PRT is strong. According to the Bikeway Master Plan Update (page vi) and Bicycle Master Plan (page 8-8), the four recommended bicycle/pedestrian overcrossings in the Transit Area are estimated to cost \$20 million. Since the 2009 publication of those documents, estimated costs of the four POCs has risen 40% to \$28M (\$9M + \$9M + \$5M + \$5M). Before spending \$28M on bicycle/pedestrian improvements in the TASP area, fiscal prudence would ask what value to the area could be provided by 3 linear miles and 6 stations of PRT for the same price.
- f. **Implementation Metrics.** We applaud the City's aggressive implementation metrics. Such willingness to set high goals will serve Milpitas well as further changes are needed in the years after 2020. In particular, we cite for special recognition Measures 1.1, 1.2, 1.4, 1.7, 3.1, 3.2, 3.3, 3.5, 6.1, 8.1, 8.2, 10.1, 10.4, 11.1, 12.1, and 12.2 of the Climate Action Plan. During review, some questions arose.
 - i. In regards to, “Measure 1.1: Residential energy audits in older homes facilitate energy audits of 40% of the city’s existing housing stock by 2015 and 60% through city-supported incentives.”
 - 1. Question: Does “by 2015” means 1/1/2015 or 12/31/2015?
 - ii. In regards to, “Measure 6.1: Implementation Metrics: Participation Metrics: 8,000 single-occupant commuters working and/or living in Milpitas become new transit riders.”
 - 1. Question: What is the total number of single-occupant commuters currently working and/or living in Milpitas?
 - iii. Although Measure 10.1 supports developers in obtaining and providing charging stations for new parking locations for electric cars, no provision is made for the growing number of electric bikes and scooters. On the other hand, Measure 12.1, Action C could serve that transportation segment in addition to its intended use. “Require new buildings to provide accessible exterior electrical outlets to charge electric-powered lawn and garden equipment.”
 - 1. Question: Is it appropriate to refer to electric bikes in this or any other section of the CAP?
- g. **Sustainability Manager.** We also commend staff for noting the need for someone to drive the programs outlined in the CAP. This individual will be helpful, if not essential, to the other six implementation programs. One example is Implementation Program 6: Development Checklist. The Development Checklist (CAP Appendix C) is an innovation that we are pleased to see implemented. Even better is your commitment to “Create and distribute to regional partners a case study highlighting the benefits, lessons learned, and customer feedback discovered through implementation of the development checklist.”
- h. Finally, we applaud your commitment to **monitoring efforts**: “This plan identifies the responsible department for each measure and offers time frames for implementing each strategy.”

2. **Supported Policies and Suggestions**

There are several measures and actions that were not mentioned in the Milpitas Climate Action Plan that we hope you will consider including:

- a. Measure 10.3: Electric Vehicle Partnerships, Action A states: “Work with partner agencies to seek grant funding through state and regional partnerships to fund fleet conversions to electric vehicles.” We’d like the City to consider funding light electric vehicles (LEV), like electric bikes

and scooters, as well. Due to their low cost and ready availability, LEVs could easily be incorporated as part of the City's fleet. Good quality electric bikes and scooters can be purchased for less than \$2500 each. In addition to reducing CO₂ emissions each time an LEV is used rather than an automobile, City staff will be promoting the use of LEVs in the community simply by riding instead of driving.

- b. Page 4-5 briefly describes various programs, including the Bikeways Master Plan. The second sentence cites commuter mode shifts from personal vehicles to bicycles. As many cyclists consider their bikes to be “personal vehicles,” we suggest a minor edit to the sentence to distinguish between bicycles and personal vehicles that generate carbon emissions: "The reductions are associated with commuter mode shifts from personal fossil-fueled vehicles to bicycles."

3. Areas of Concern with Recommendations

Clearly, the CAP does well within the scope set for itself, i.e. through the year 2020. However, areas of concern still exist. The Sierra Club Loma Prieta Chapter has the same aim as the Milpitas Climate Action Plan, to significantly reduce greenhouse gas emissions in order to reduce the impacts of the climate crisis on our planet and for future generations. We hope you will seriously consider our recommendations for improvement:

- a. We applaud staff's recognition that not all measures will be achieved in a timely way. We agree with the precaution of including a buffer, but we feel the buffer is too small. If all implementation metrics were achieved but not exceeded, a 16.2% reduction in CO₂ emissions would ensue, a 1.2% buffer over the 15% minimum required under AB32. **Given the challenge of achieving many aggressive implementation metrics, and how rapidly climate change is accelerating into crisis conditions, we see a 5% buffer as being more appropriate.** And we acknowledge that some reductions are not included (such as from the existing green building program) “because the information needed to quantify the program is unavailable.” Regardless, exceeding the standards of AB 32 helps California attain its goals.
- b. Although we totally support “GOAL 7: Increase use of non-motorized transportation throughout the community,” we find that “Action A, Implement the Bikeway Master Plan,” is deficient. The Plan is out of date due to rapid changes since its 2009 publication. Although Milpitas has a good record at painting stripes for bicycle lanes, it lags other cities in building large infrastructure projects that support cyclists, pedestrians and public transit. For example:
 - i. The Bikeway Master Plan fails to support a keystone project that has been identified over the years in various City plans. Recently the City Council again indicated its interest in a bike/pedestrian crossing of the railroad tracks to connect Yosemite Drive with Curtis Avenue.
 - ii. The Bikeway Master Plan also makes no mention of two other bicycle/pedestrian connections with the potential to substantially increase use of transportation alternatives in Milpitas: 1) an east-west crossing of I-880 near the Calaveras Boulevard interchange, and 2) a north-south crossing of Scott Boulevard for users of the Hetch-Hetchy right-of-way.
- c. Although the CAP well addresses steps to meet the 2020 goal of reducing emissions by 15%, there is no information about the years after 2020. Rather than delay implementation of this CAP by extending its time frame to 2035, **we recommend that the CAP be updated in 2015 to include measures needed to attain the 2035 goal** of reducing emissions by 52% as required by AB 32. Two areas with above-average potential for emission reductions are transportation and population.
 - i. Transportation and land use measures comprise 23% of the anticipated reductions in 2020. However, transportation contributes 50% of total emissions. Innovative strategies in transportation may hold unforeseen potential.

- ii. IMPACT OF STATE REDUCTION PROGRAMS (page A-8) mentions that “Emissions in 2035 are 3% above baseline ...” [emphasis added] That portends a failure to reduce emissions by 52% in 2035 as required by AB 32. The unstated primary driver of this failure is population growth as shown in Table A-3: BAU Forecast Indicators. The number of residents is expected to grow from 64,800 in 2005 to 106,000 in 2035, a 63% increase. **Policies and programs to reduce fertility rates** should be investigated for their potential effects on emissions.
- d. Explore the potential of an **Automated Transit Network (ATN)** for reducing CO₂ emissions in Milpitas as recommended at the August 24, 2011 CAP Planning Commission Workshop and public comment meeting. For additional background, see Sierra Club comments to the recent Circulation Element update. If such a citywide ATN system were operating and captured 10% of the driving in Milpitas, it would reduce emissions approximately 29,683 MTCO₂e in 2020 – a reduction that dwarfs any other implementation measure in the CAP.¹
- e. The monitoring provisions of the CAP will inform us how our plan is working, but **consequences and accountability** are needed to ensure we meet the reductions that are critical to the future of Milpitas and human life.

Conclusion

Again, we commend staff on the excellent work involved in creating the CAP and appreciate the opportunity to provide our input. We hope that our comments combined with the wisdom of the entire community elevates the Milpitas CAP to an award-winning and exemplary model that shines a light for other communities.

Respectfully Submitted,

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Sustainable Land Use Committee Member

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¹ According to Table A-3: BAU Forecast Indicators, annual VMT by Milpitas residents in 2005 was 697,265,000. Using a fleet average mileage for passenger vehicles of 21 miles per gallon (Page 3 of Climate Change Draft Scoping Plan: Measure Documentation Supplement (http://www.arb.ca.gov/cc/scopingplan/document/measure_documentation.pdf) yields a baseline consumption of 33,203,095 gallons of gasoline annually. Using a conversion factor from the Scoping Plan (0.00894 MTCO₂e /gallon of gasoline), that number of gallons generates 296,835 MTCO₂e annually. If 10% of VMT by Milpitas residents was captured by renewably-powered ATN, a reduction of 29,683 MTCO₂e can be expected.