

# CORRESPONDENCE

**Jomsky, Mark**

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**From:** Stone, Rhonda  
**Sent:** Monday, January 29, 2018 2:38 PM  
**To:** Tornek, Terry  
**Cc:** Jomsky, Mark  
**Subject:** FW: Environmental plan

FYI:

**From:** Shari Thorell [mailto:stepres@aol.com]  
**Sent:** Monday, January 29, 2018 2:32 PM  
**To:** Cerna, Anita <acerna@cityofpasadena.net>  
**Cc:** Madison, Steve <smadison@cityofpasadena.net>; Stone, Rhonda <rstone@cityofpasadena.net>  
**Subject:** Environmental plan

I am writing regarding the draft of the report about the environment plan and the City of Pasadena. In particular, I have MAJOR CONCERNS about the extent that biking is encouraged along roadways that carry heavy auto traffic. Researchers at the USC Davis School of Gerontology, and other universities, have published research results that pollution has a cumulative and significant detrimental effect on cognitive performance as you age. Bicyclists ingest large quantities of dangerous nano-particles that go directly to the brain. This is not just car exhaust, but the nano particles that are emitted when someone taps on their brakes, which accumulate within the brain, and are associated with major cognitive decline in later years. In other words, this is a public health issue waiting to happen which would be extremely harmful not only to those affected and their extended families but also would dramatically increase the public and private costs associated with providing health services to the cognitively impaired.

I have been in touch with Steve Madison about this danger and have also informed the head of public health in Pasadena. I have also given them the names of the researchers, who would be willing to discuss the findings with anyone. Of course, no one wants to recognize this politically unpopular truth. It is health disaster waiting to happen and SHOULD NOT BE IGNORED. When you talk about educating the public re: biking, why is there no mention of the negative impact on cognitive and respiratory health? At the very least, people you are encouraging to use bicycles should be made aware of the health dangers this activity entails. (You are educating them about safety relating to vehicular traffic, but not about their own health.)

This omission equates to subterfuge, purposely hiding the facts, and ignoring the health of the community. It is dangerously IRRESPONSIBLE as well as unconscionable and a complete abdication of public responsibility. Just imagine a future Class Action law suit since people in the health department and government leadership have been warned about the harmful effects of pollution on bikers and yet our city officials have not shared this information with the public....

Shari Thorell  
Pasadena

PS Please distribute this information to the Mayor and the City Council and confirm that you have done so via a return email. Thank you.

My name is Tom Brady and I am part of an environmental group, Pasadena 100, that has been talking with Council members and City staff on the need to increase Pasadena's commitment to using green municipal energy to address the climate crisis. We have been closely following the drafting of the Climate Action Plan, or CAP, and are disappointed that the City has not, thus far, recognized how the stringent requirements of the CAP should lead to a greater commitment to carbon-neutral energy. Under the CAP, the City is required to adopt enforceable measures to reduce the local share of greenhouse gas emissions by 437,710 tons by 2035. According to the 2017 State General Plan Guidelines, a CAP should include "feasible and enforceable emission reduction measures" supported by "substantial evidence in the record [that] supports an agency's conclusion that mitigation will be effective." The Guidelines quote a 2010 published court case from Richmond California that climate mitigation plans should be "coupled with specific and mandatory performance standards to ensure that the measures, as implemented, will be effective."

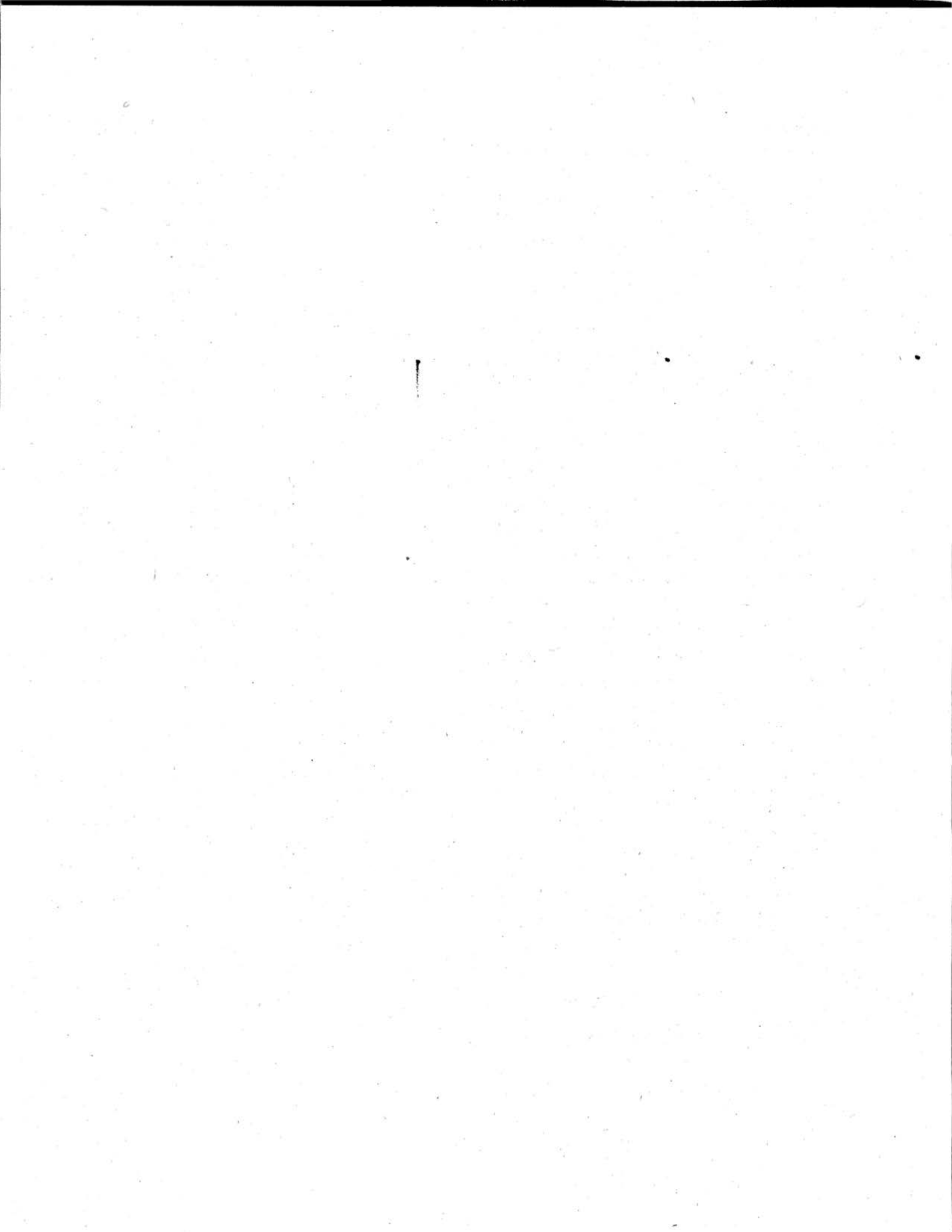
This should be contrasted with Pasadena CAP measure E-2.1 titled "Facilitate energy efficient upgrades in existing homes and businesses." This measure, the largest in the CAP, is relied upon for 37% or 162,720 tons of the total local emission reductions. Specifically, the goal of the measure is to "Decrease energy use in existing buildings by 40% below 2013 levels by 2035." The feasibility of this entirely voluntary measure is only upheld by statements in the Technical Appendix summarized by "Energy efficiency upgrades to existing buildings can achieve up to 40% energy savings cost effectively." Anyone experienced with these measures knows that it is very hard to get homeowners to pay large sums of money for measures that only become cost-effective after many years of energy savings. At our own Pasadena home, we spent \$45,000 on major upgrades and got back \$11,000 from Energy Upgrade California and \$700 from Pasadena Water and Power, but few people will follow our lead.

The only reason this unreasonable measure is in the CAP is because it is hard to find enough local emission reduction measures to add up to 437,710 tons. The City could have followed the lead of many other cities and relied upon a faster transition to green municipal energy. In the case of San Diego, they rely upon a green energy program to obtain 63% of the 2.5 million tons of their reductions from local actions. This is a very reasonable and enforceable strategy that relies upon recent rapid decreases in the cost of renewable energy and battery storage. Before the target year of 2035, it is widely predicted that renewables plus storage will become less expensive than all fossil-fuel alternatives, including natural gas.

We would like to request that the City Attorney be asked to determine if, by adopting the proposed Climate Action Plan, the City is putting its future development in a legally vulnerable position. In the Richmond case, a City EIR was deemed inadequate because the climate impacts of the project were not sufficiently mitigated by the proposed measures, including energy efficiency upgrades as in the Pasadena CAP. Would it not be more prudent for the City to replace the legally questionable CAP strategies with increased carbon-neutral municipal energy, a clearly enforceable and effective strategy.

Tom Brady, Chair of the Environmental Ministry of All Saints Church

1501 Poppy Peak Drive, Pasadena, CA 91105 1/23/18





PLANNING & COMMUNITY  
DEVELOPMENT DEPARTMENT

February 27, 2018

To: Tom Brady

SUBJECT: Pasadena Climate Action Plan – Response to Letter Submitted on 1/23/18

Dear Mr. Brady,

Thank you for your patience during the preparation of this letter and the opportunity to provide the information contained herein. The letter indicated that you are concerned that the Pasadena Climate Action Plan (CAP) measure E-2.1 is infeasible as a method to decrease greenhouse gas (GHG) emissions to the extent stated in the CAP. In the letter it states that this measure is an “entirely voluntary measure” and that its feasibility is not supported by substantial evidence, and that it will be ineffective because it is too difficult to get homeowners to pay large sums for energy saving measures that only become cost effective after quite some time. Instead you encourage the City to rely on a faster transition to green municipal energy to achieve the reductions that are anticipated by measure E-2.1.

It is important to remember that the CAP functions as a planning document, similar to the General Plan. The City has committed to monitoring its progress to meet the goals in the CAP and to update it at least every 5 years based on progress toward those goals. In that way, any new science, policies, or information can be incorporated (as this field of science is growing and changing rapidly), and any slow progress toward meeting goals can be remedied.

The majority of the energy use within Pasadena is consumed in the community’s existing residences and commercial buildings. Therefore, to achieve the state imposed ambitious GHG reduction targets, the CAP had to be ambitious and conclude that it is imperative that energy reductions be achieved in this sector. Measure E-2.1 has been developed to achieve GHG reductions through facilitating energy efficient upgrades in existing homes and businesses. Energy-efficiency upgrades to existing buildings is a prominent component of the actions, recommended by the California Air Resources Board’s 2017 Scoping Plan, that can be undertaken at a local level to support the State’s climate goals<sup>1</sup>.

<sup>1</sup> California Air Resources Board (ARB). 2017e. California’s 2017 Climate Change Scoping Plan. December 14, 2017. [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). (accessed February 2018).

Tom Brady  
February 27, 2018  
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mandatory performance standards to ensure their effectiveness. (*Id.* at p. 94.) If measures under the CAP must be imposed on a project in Pasadena, we would ensure that any mitigation plan was set at the time of project approval, a performance standard was set and measures imposed were specific and mandatory, thereby avoiding the deferred mitigation problem identified in that case.

As stated above, in the letter you encourage the City to rely on a faster transition to green municipal energy to achieve the reductions that are anticipated by measure E-2.1. The City is a leader in its transition to green municipal energy. However, the CAP is not the appropriate process through which to advocate for a change in the transition to green municipal energy. Pasadena Water and Power (PWP) is a publicly owned utility (POU) and the local energy provider in Pasadena. The CEC and SB 350 require that POU's prepare Integrated Resource Plan (IRP) to evaluate their ability to provide reliable and cost effective electric service to their customers and includes a requirement to evaluate how the POU will align with the GHG emission reductions required by the State. The CEC must then approve of PWP's IRP power mix based on, among other factors, the actual reliability of the power sources. Thus PWP's regular IRP update is the legal process to evaluate how the City can increase their renewable, and reliable, power portfolio. Measure E-5 of Pasadena's CAP calls for the continued expansion of the City's renewable and/or carbon neutral energy portfolio and implementation action C calls for the evaluation of a 100% Carbon-neutral portfolio model as part of the City's 2018 IRP update. In this way, the CAP pushes PWP toward green municipal energy, but within the appropriate regulatory framework of the IRP and its approval by the CEC.

I hope that this letter is responsive to your needs with respect to moving the CAP forward. Please do not hesitate to contact me if you have additional questions or clarifications.

Sincerely,



David M. Reyes  
Director of Planning & Community Development

cc: Theresa Fuentes