

City of Lakewood
Comments on draft Local Government Operations Protocol
July 18, 2008
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General Comments

1. How does a city determine its 1990 GHG levels?
2. The notice for review and comment for this protocol was inadequate. Given that this document directly impacts all local governments within California, local governments must be directly contacted concerning their review and comment for this document. Notice to government associations and other affiliates by itself is insufficient. As such the comment period for this protocol must be extended.

Page, Location, and Comment

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| 13 | Reporting Principles, under “Completeness” “Any specific exclusion should be justified and disclosed”.
Some utility providers, including those operated by local governments, require a level of obscurity for certain technical aspects of their operations in the interest of security against terrorism and domestic threats and therefore such information cannot and should not be disclosed. Clear guidelines must be provided on how to address this principle while maintaining necessary security. Local governments must have an opportunity to review and comment on the additions prior to adoption of this protocol. |
| 16 | Establishing a base year.
It is our understanding that the Local Government Operations Protocol was developed for use by local governments throughout the United States (page 11) however AB32 does not compel local governments outside of California to comply with the protocol. The protocol must be written specifically for jurisdictions within California. The protocol encourages local governments to choose a base year that is representative of the general level of emissions over the surrounding period. If the goal of AB 32 is to reduce GHGs to 1990 levels by 2020, then 1990 should be the base year that all local governments should strive for. Furthermore, most local governments do not have the expertise or resources to determine whether or not the base year they select actually represents typical emission levels that period of time. If AB 32 identifies 1990 as the target year, then there should be air quality data that can be modeled for each local government in the state. That data should then be provided to each local government to aid them in their GHG reduction plans. |
| 16 | 2.3 Scope of Sources.
What is a biological stock of carbon and how does a local government determine whether or not they control it? The term biological stock does not appear in the Glossary of Terms. |
| 25 | 4.1 GHG Emission Scopes – Scope 3.
What is the definition of “upstream and downstream emissions?” These terms are not in the Glossary of Terms. |

27 4.6 Biogenic Emissions.

If a consensus has not been reached on the net climate impact from the combustion of biogenic emissions, then how will local governments be able to determine the efficiency of their emission reduction plans? What was the level of such emissions in 1990 at the jurisdictional level?

33 The sixth paragraph cites a need to make comparisons between local governments.

We question the need for resources to be used for comparing one local government to another. Comparisons should only be made within a single agency over a period of time to determine the effectiveness of a given jurisdiction's programs designed to reduce GHG. Comparing the reduction in emissions among local governments will not result in a fair or accurate comparison among local governments as GHG units per capita and/or geographic area vary greatly among local governments. California has a wide spectrum of temperature and climate zones. The size and location of the local government jurisdictions within those zones influences that agency's creation of GHG including those relating to energy use, heating, cooling, and transportation. As such, the production of GHG in one jurisdiction will vary greatly from other jurisdictions, even among adjacent local governments. Other factors such as the age of facilities, type of construction, make and model of equipment, frequency of use of equipment and facilities, levels of maintenance, and even usage by different personnel will make comparisons among local governments an exercise in futility. However, the sharing of ideas and techniques will allow individual local governments to tailor such approaches to more efficiently reduce GHG based on their internal GHG monitoring and should therefore be encouraged.

35 Agencies combusting fuels not listed in Appendix "C".

Although the use of such fuels may be uncommon, most local governments do not have the resources or staff necessary to determine the emission factor based on specific properties of fuels listed in Appendix "C". Additional time is needed prior to the adoption of this Operations Protocol to allow cities to identify and inventory the fuels they use so that such fuels may be included in Appendix "C".

39 Electricity Consumption.

The Operations Protocol encourages local governments to use the California Grid Average Electricity Emission Factors found in Appendix "C" (page 157), but data is only provided up to the year 2004. For local governments to meaningfully monitor their GHG, more current data is required.

40 Utility-specific emission factors.

The option of using a utility-specific emission factor that has been verified by a third party could be problematic in that the Electricity Emission Factors found in Appendix "C" only go up to 2006 and the text in the Operations Protocol states that previous year figures should be used. If the Operations Protocol is not adopted until 2009, then 2008 factors will be required.

- 42 Estimated electrical use for leased space.
The section for estimating electrical use for leased space introduces occupancy rate into the equation, which may result in skewed results with respect to electrical consumption. Some property owners include electrical, heating, and cooling in the cost of a lease while other property owners do not. Local governments leasing facilities typically have no control over the energy usage in other tenant spaces whether occupied or not. The directions for this section need clarification for different scenarios prior to the adoption of this Operations Protocol.
- 46 Consensus on green power purchases.
Additional time is needed prior to the adoption of this Operations Protocol to develop accounting framework for green power purchases. As we move closer to 2020, it is reasonable to predict that local governments, in an effort to reduce GHG, will seek out and purchase and/or produce green power. These efforts will play an important role in annual reporting thus the importance of having an accounting framework in place.
- 54 6.6 Fugitive emissions from refrigerants and fire suppression equipment.
Clarification is necessary if hand-held fire extinguishers are included in this analysis.
- 112 Power Generation Facilities.
Provide clarification on the second paragraph and where a local government should report energy consumption. There also appears to be a spelling error in the second paragraph (faculties or facilities?).
- 113 Carbon offsets purchased/sold.
Additional time is needed prior to the adoption of this Operations Protocol to develop accounting framework for the purchase/sale/retirement of carbon offsets. As we move closer to 2020, it is reasonable to predict that some local governments, in an effort to reduce GHG, will enter the carbon offset marketplace. These efforts will play an important role in annual reporting thus the importance of having an accounting framework in place. Local governments must have an opportunity to review and comment on the additions prior to the adoption of this Operations Protocol.
- 113 Renewable Energy Credits purchased/sold.
Additional time is needed prior to the adoption of this Operations Protocol to develop accounting framework for the purchase or sale of renewable energy credits. As we move closer to 2020, it is reasonable to predict that some local governments, in an effort to reduce GHG, will enter the renewable energy credit marketplace. These efforts will play an important role in annual reporting thus the importance of having an accounting framework in place. Local governments must have an opportunity to review and comment on the additions prior to the adoption of this Operations Protocol.
- 115 Local Government Operations Standard Inventory Report Template.
An electronic version of the Local Government Operations Standard Inventory Report Template with built-in formulas should be available to download from the website.

- 129 Background on AB 32.
Provide a physical mailing address to request information on local government protocol.
- 129 Baseline emissions.
It should be noted that the goal is to reduce GHG levels to 1990 levels.
- 142 Chapter 16 Program-Specific Reporting Requirements – ICLEI
Additional time is needed prior to the adoption of this Operations Protocol to develop accounting framework for specific reporting requirements for ICLEI so that local governments may have an opportunity to review and comment on the additions prior to the adoption of this Operations Protocol.