



Hennepin County Department of Environmental Services

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To: ICLEI
California Climate Action Registry
California Air Resources Board
The Climate Registry

From: Carl Michaud, Director
Department of Environmental Services
Hennepin County, Minnesota

RE: Comments on the June 19, 2008 *DRAFT* Local Government Operations Protocol

Thank you for preparing the *DRAFT* Local Government Operations Protocol for developing and reporting standardized inventories of greenhouse gases (GHG) from local government operations, and thank you for the opportunity to comment on this *DRAFT* Protocol.

Hennepin County is a founding member of the Cool Counties initiative and a collaborator with the National Association of Counties County Climate Protection Program. Hennepin has begun the task of preparing an inventory of GHG's from operations and developing strategies to meet numeric targets for reducing future emissions. We are learning from this effort how difficult it can be to identify and fully account for GHG emissions with a high level of accuracy even when relying upon standard methodologies and generally accepted principles for tabulating GHG emissions.

We have reviewed this *DRAFT* Protocol with a broader perspective in mind for what a GHG reporting protocol might provide to local governments that is otherwise unavailable. Because such protocol must operate within the context of voluntary reporting for the foreseeable future, and must be broadly applicable for diverse communities and local government operations, simplicity and breadth will be critical to its success. Accomplishing this without compromising the data the protocol seeks to document is no small task.

Portions of the *DRAFT* Protocol seem to address regional rules and regulatory structure rather than provide the broad framework necessary to achieve more universal appeal. We encourage greater reference to existing international standards and protocols.

Local Government Operations (LGO) Protocol – Hennepin County comments
Draft July 19, 2008

Comment No.	LGO Sect. No.	LGO page No.	Comment
1	3	18 - 24	The protocol is not clear as to which scope emissions to report associated with leased facilities. The problem arises for leased facilities/vehicles of short or long duration.
2	3.2	18	"Wholly owned" assets does not always mean a government has operational control. In addition, for assets under multiple jurisdiction it is even more difficult to determine reporting responsibility and the protocol does not resolve the matter. Two examples are: a facility that exists within a public/nonprofit partnership for which the public entity has some operational control; and a public/public partnership for which operational control is shared. Shall emissions be reported based upon a percent of control of the facility?
3	4.1	25	TCR's general protocol requires inclusion of biogenic source emissions in scope 1 -- albeit segregated from fossil fuels. This LGO protocol explicitly says biogenic emissions should be excluded from scope 1. Please explain the treatment expected.
4	4.2	25	Section 4.2 appropriately differentiates Power generation facilities from Buildings and other facilities among Local Government Sectors, where district heating is likely to produce energy for other entities to consume. Similarly we recommend a transit sector representing public transit operations (buses, LRT, etc...) with separate reporting status from routine fleet operations to achieve better organizational accounting and benchmarking against other reporters.
5	8	75-83	The Protocol does not provide guidance as to how to estimate emissions associated with residues.
6	8.4.2	82-83	This section refers local governments to use industrial best practices to estimate emissions associated with fuel handling and storage. There should be a list of some of these practices to guarantee uniformity among all Reporters. In lieu of standardized methodologies for calculating emission sources for biomass handling & storage, the protocol should reference acceptable "industry best practices." The same is true for 8.4.2, coal handling and storage. If the methodologies are that vague, perhaps reporting should wait until better understood/established.
7	9	84	Weblink outdated: http://www.arb.ca.gov/cc/reporting/ghg-rep/ghg-rep.htm
8	9.3	85	The IPCC FOD model and CARB Excel-based tool are not readily available for review and therefore we cannot comment on it.
9	Box 9.1	87	The data necessary to account for prior year disposal is unreasonably difficult to obtain.
10	9.4	94	Does the statement that references future information suggest that composting should be ignored for now? The County anticipates increased reliance on composting and will value consistent guidance once developed.
11	Table C.2	154	Lacks reference for default values for biomass and non-fossil fuels (solid). In general, here and elsewhere in the Protocol, it would be useful if references were made available. When there are multiple references, it would be useful for the protocol to rank them for suitability.