



Mestre Greve Associates

July 18, 2008

Local Government Operations Protocol Committee
Sent Via Email

Subject: Comments on the Draft Local Government Operations Protocol

We appreciate the opportunity to comment on the “Draft Local Government Operations Protocol,” dated June 19, 2008. Our firm has been preparing emission inventories since 1981 for facilities including airports, highways improvements, and planned communities. We have been discussing the draft Protocol with a number of cities, and our comments below derive in part from these informal discussions. Overall, we think the document is excellent and your work is very commendable. Please take our comments below as suggestions for your consideration, rather than criticisms of the document.

1. **Part 1, Purpose, Page 9.** Please expand on why a city would benefit from preparing a GHG for their operations. This comment derives from a conversation with City staff who felt that preparing an inventory was going to be a tough sell to his City Council. The more reasons that are stated in the Protocol, the easier it will make staff’s job. The long-term reduction of GHG of course is the primary goal, but unfortunately not all council members may be sympathetic to that point of view. Other reasons that might play into the decision to prepare an inventory is identification of activities that are not energy efficient and therefore more costly than they need to be, the need to prepare a City inventory in preparation of preparing a community scale GHG inventory, and the inability of a City to impose limits on new projects without understanding the impact of their own operations. The political consequences should also not be ignored; many constituents will look favorably on a government official is pro-active in addressing climate change. And finally, is there any benefit in preparing an inventory now, as opposed to waiting 3 or 4 years?
2. **Chapter 2, Section 2.2, Pages 15 - 16.** I understand your approach and argument for utilizing a current year as the baseline rather than 1990. It is the only feasible approach for establishing an accurate baseline. However, the question that continues to come up is ‘how do we measure our progress with respect AB32 and the goal of

achieving 1990 levels?’ Can any guidance be developed that would allow us to extrapolate back to 1990 to give a city a rough idea of whether their emissions are on the decline or are increasing, and what level of reductions they should be considering if they want to get back to 1990 levels? For example, if a city knows the square footage of their facilities in 1990 in comparison to today, can they use that ratio to make a rough estimate of the emissions from electricity use in 1990?

3. **General Comment.** Inclusion into the document (or published on the website) of a completed emission inventory would be extremely useful. I am sure that many cities will have similar problems and experiences in completing the emission inventory and reporting it. It will be very beneficial to see a real-world example of a completed inventory.
4. **General Comment.** At the last webinar there was some suggestions regarding funding and grant opportunities that might be available to cities for preparing GHG inventories. Inclusion of potential sources of funding that you are aware of would be very beneficial to cities trying to prepare an inventory.

Thank you again for your work on this very important protocol. If you have any questions or comments, please do not hesitate to call or email.

Sincerely,

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