

### Comment Summary and Handling of Comments Received on the July 9 Public Review Draft of the CCSC Climate Change Report

Comment Number	Commenter (see attached list of commenters with acronyms)	Comment	Response
<b>General Comments on Climate Change and Greenhouse Gases</b>			
1	AQPAC	The report should mention the risk of catastrophic climate change.	<b>Agreed. Text added to report.</b>
2	TPB, Johnson	Cumulative emissions should be considered, not just annual emissions. This will become increasingly apparent if emissions are examined cumulatively across the 50 year horizon rather than on an annual basis, since early emissions reductions will have a compounding effect upon future emissions levels. Further work should look into the implications of measuring cumulative emissions with regard to reductions targets and assessment of emissions reduction measures.	CCSC agrees. Such an analysis is recommended for the next phase of the climate change program.
3	AQPAC	The report should explain the sources and significance of different greenhouse gases early in the report. If additional steps are needed to control other (i.e., non-CO2) greenhouse gases, then those steps should be discussed. If additional research is needed to address this point, then the report should say so.	<b>Agreed. Text added to report.</b>
4	NVRC	Page 7 (Methodology). Can the reliability or margin of error for the methodology used to calculate greenhouse gases be more clearly communicated? Inventorying greenhouse gas emissions is extraordinarily complicated and notoriously inaccurate. It might be useful to include some language on the strengths and weaknesses of the methodology used for the inventory.	<b>Agreed. Text added to report.</b>
5	Sierra Club	It would appear that the CO2 emission inventory is regional; however, responses are jurisdictional. Disaggregation of the data will be helpful.	A complete data set that would enable presentation of a disaggregated inventory is not available at this time. Efforts are underway to develop jurisdictional level inventory data. No changes made to report.
6	Moskitis	Climate Change is not real. Temperatures since the year 2000 have actually declined.	No changes made to report. CCSC understands that the science of climate change is being debated. Nevertheless, CCSC believes that recommendations in the report are appropriate given the very strong consensus in the scientific community, possible risks posed by increasing concentrations of greenhouses gases, the significant

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			emissions contribution from the region, and the opportunities to take action that will not only contribute to the global solution but will also improve economic efficiency and have other co-benefits (energy conservation, better land use, economic development).
7	Waters	<p>The Report relies heavily upon United Nations Intergovernmental Panel on Climate Change (IPCC) and concludes that “the Earth is gradually warming and this warming trend is due in large part to human activities” (p. 2). Many in the climate change alarmist community cite this report as fact, without any close scrutiny. In December 2007, the Senate Environmental and Public Works (EPW) Committee released a report which listed the names of over 400 prominent scientists and subject matter experts who have voiced serious objections to the so-called “consensus” of man-made global warming. Many of these scientists are current or former participants in the IPCC.</p> <p>The EPW Report is available at:  <a href="http://epw.senate.gov/public/index.cfm?FuseAction=Files.View&amp;FileStore_id=bba2ebce-6d03-48e4-b83c-44fe321a34fa">http://epw.senate.gov/public/index.cfm?FuseAction=Files.View&amp;FileStore_id=bba2ebce-6d03-48e4-b83c-44fe321a34fa</a></p> <p>The December 13 (100 Scientists) Letter I available at:  <a href="http://www.nationalpost.com/news/story.html?id=164002">http://www.nationalpost.com/news/story.html?id=164002</a></p>	CCSC believes that it is appropriate to take prudent steps to develop programs to respond to this global threat. Even if there is some uncertainty about the potential climatic impacts of anthropogenic emissions of greenhouse gases, CCSC believes that there is sufficient agreement about the possibility of unacceptable risks from failure to act. As part of the next steps of the planning process more information will be developed on the costs and benefits of measures. No changes made to report.
8	Slabinski	I wish to question the Report's interpretation of Fig.6 on page 24 [pdf p.30] which shows the "Annual Average Temperature in the Washington, DC Metropolitan Area". The Report states (p.23) that there is a 3 times faster increase in temperatures over the past 50 years than the trend of 1893-2003. This is not the whole truth; inspection of the graph shows that there was a drastic temperature decrease of 1.0 deg F from 1950 to 1960 [a trend of MINUS 1 deg/decade]. The conditions that caused this decline, at a time when there was considerable man-made production of GreenHouse Gases (GHG), needs to be explained. If we understood the conditions that caused this, can they be reestablished to cool the planet now, in place of the drastic	While the commenter is correct in his interpretation of the above mentioned graph regarding the temperature change during the period 1950 through 1960 in the Washington, DC region, any conclusion regarding climate change in general and temperature change in particular must be established on the basis of global data on a long-term basis and not just looking at the Washington, DC region data for a brief period. While there might be some temperature decline in the Washington, DC region during that period, the global temperature trend does not reflect such trend for the same period as seen in Figure ES-2 (Global temperature Trends) proving that it was a local

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		GHG emission that the Steering Committee wants the public to undertake?	phenomenon. Therefore, data for the Washington, DC region in Fig. 6 must be seen in association with global data provided in Figure ES-2. Also, it is extremely difficult to point out the factors that led to the decline in temperature in the Washington, DC region for that period. For this reason, reestablishing those factors or conditions in order to decrease the temperature in the Washington, DC region will not be possible and the reducing greenhouse gas remains the best option for the region. No changes made to report.
9	COG Chesapeake Bay and Water Resources Policy Committee	Make a formal request to wastewater and drinking water (WW/DW) treatment agencies/organizations in the region to provide data and participate in the inventory of current as well as future energy demands and planned offsets.	CCSC agrees with the recommendation and hopes to improve data from this sector in the future.
10	COG Chesapeake Bay and Water Resources Policy Committee	Work with the region's WW/DW agencies/organizations as well as national organizations to develop standard protocols for calculating GHGs for WW/DW plants, as well as to quantify potential reductions/offsets from these facilities.	CCSC appreciates the suggestion and will seek to work with WW/DW agencies in the future.
11	COG Chesapeake Bay and Water Resources Policy Committee	COG staff should work with the COG Water Resources Technical Committee (WRTC) as well as local WW/DW authorities to develop specific language to address these points and the other recommendations for inclusion in the final report.	CCSC will work with WRTC to develop language to address wastewater and drinking water treatment facilities in the report.
<b>Comments on COG Climate Change Program</b>			
12	AQPAC	The commenter supports the report's recommendations that 1) that the Council of Government's regional climate change initiative should continue; and 2) proposed governance structure for ongoing COG climate change initiative be adopted.	Agreed. No changes made to report.
13	Chesapeake Bay Foundation	The time to be tepid, and modestly measured, and afraid to shake up government and business norms, is long past. Our region and our world are in environmental crisis. We must respond.	CCSC agrees that a response is required and our preferred recommendations are aggressive, representing a major change from business-as-usual. No changes made to report.

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	TPB	With regard to the proposed governance structure for an ongoing COG Climate Change Initiative discussed in the July 9 draft report, the TPB recommends that any new committee established to address climate change should include at a minimum all of the member agencies and jurisdictions of the Metropolitan Washington Air Quality Committee (MWAQC). Coordination between TPB and MWAQC has been accomplished effectively over several years in part because of the inclusive membership structure of MWAQC in which all of the state air agencies and state departments of transportation are members. A similarly inclusive structure should provide for good ongoing coordination in addressing GHG emissions.	CCSC agrees that any new committee established to address climate change should include local government elected officials, and representatives from state air quality agencies and other major stakeholders including state transportation officials. The COG Board will consider the design and membership of the new committee once it acts on the climate report.
14	Sierra Club	Sierra Club strongly encourages both the COG Board and participating jurisdictions to address global warming with all urgency. The Sierra Club Washington, DC Chapters, Montgomery County Group of the Maryland Chapter, and the Great Falls Group of the Virginia Chapter (hereafter, "the Sierra Club") endorse this initiative and offer our support in advancing goals and policy recommendations toward substantive decisions, action programs, and investments in transforming energy and transportation in our regional jurisdictions. We thank the COG Board of Directors for initiating this project, commend the Climate Change Steering Committee Members for their action, and recognize the expertise brought to the task by the COG Department of Environmental Programs.	CCSC agrees and appreciates the recognition and agrees on the need for taking action now.
15	Alexandria	The Virginia Department of Transportation (VDOT) is not listed as a member of the Climate Change Steering Committee yet many of the proposed recommendations to reduce greenhouse gas emissions are transportation related. Alexandria recommends COG solicit specific input from VDOT's on the draft report and nominate a VDOT representative to the CCSC.	CCSC envisions that VDOT will be able to formally participate in the climate initiative as the program moves forward. VDOT has participated more informally throughout the process and has made important contributions. No changes made to report.
16	Alexandria	We commend the efforts of COG and the CCSC for its work on the draft report and for emphasizing the importance of establishing a regional framework to address the challenges posed by climate change. We also thank COG staff for presenting this report to the City of Alexandria's City	CCSC appreciates the recognition.

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		Council.	
17	Sierra Club	The proposed work program should probably start and end with a plan to convene a regional group of elected officials with respective sub-committees of transportation planners, urban planners, universities, energy specialists, building & zoning officials - and others necessary to coordinate a regional plan to leverage the area's skills, expertise, and resources to address global warming and reduce CO2 emissions.	CCSC appreciates the suggestion. Such an approach may be considered by the new committee established as a result of this report. No changes made to report.
18	Sierra Club	The Sierra Club believes that COG's advantage lies as a respected regional planning body with access to local governments and other planning bodies throughout the region, and that their appropriate role is to convene regional leaders with others to advance transfer of information and coordination where appropriate. COG should focus its efforts on bringing together the region's political leaders with the region's leaders in energy efficiency, clean energy and smart growth, and developing strategies for availing jurisdictions of existing expertise and the dissemination of regionally tailored best practices.	CCSC agrees that COG should be an informed convener and facilitator, focusing on developing information on best practices, common approaches, and calls for collaborating. The program will benefit from the willingness of Sierra Club to participate in such collaboration. No changes made to report.
19	Sierra Club	Sierra Comment #14: Sierra Club recommends that COG identify, structure, and facilitate the interaction of expertise with area leaders in government, business and civil society to identify goals, performance measures, and incentives for greenhouse gases reduction, and to address the many implications of climate change.	CCSC agrees that COG should be an informed convener and facilitator, focusing on developing information on best practices, common approaches, and calls for collaborating. The program will benefit from the willingness of Sierra Club to participate in such collaboration. No changes made to report.
20	Sierra Club	The COG also needs to make a recommendation for creating a dedicated tax or revenue stream to finance the future climate responses that local governments will need to address.	There has not yet been sufficient analysis of the most effective way for the region to proceed in developing a full response to this crisis that includes dedicated tax or revenue streams. This recommendation should be considered during the next phase of the planning process. No changes made to report.
21	Fairfax Environmental Coordinator	The report should describe the anticipated processes and time frames through which specific strategies to attain the regional 2012, 2020, and 2050 would be determined. This is done to a limited extent for the 2020 target (a reference is made on page 34 to the development of a plan over a	A timeline for next steps is included in the report. The exact process and timeline for the next steps in the planning process will be developed by the new climate committee that would be formed as a result of this report. Staff will draft plans including specific

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		1-2 year period), but it may be helpful to have similar guidance for the other targets as well as guidance as to the anticipated processes and participants in the development of these strategies.	recommendations for measures implementation and timeline. The report was revised to reflect this expectation.
22	AQPAC	This document will be one of the most significant air quality products ever produced for our region. We commend you for your vision and leadership to develop such a document. We stand ready to support you in developing plans for implementation and outreach.	CCSC appreciates the recognition.
23	NVRC	Finally, given that the links between climate and energy are inextricable, consideration should be given to linking the work of the energy and climate committees – and perhaps the work of the Intergovernmental Green Building Workgroup.	CCSC will take the recommendation into consideration. The proposed Climate and Energy Policy committee would include oversight of IGBG.
24	TPB	The July 9 draft report provides a much needed introduction to climate change issues that previously was unavailable to citizens and decision-makers in the region. It also builds an important foundation for the region to identify and eventually implement strategies that address greenhouse gas (GHG) emissions. It provides a comprehensive list of such strategies across sectors that can help planners and policymakers to develop an appropriate course of action for the region.	CCSC appreciates the recognition.
25	NVTA	Draft Report Good First Step. By inventorying and reviewing greenhouse gas emissions, best practices, federal, state and local policies, a wide range of measures to reduce greenhouse gas emissions and other actions, the Steering Committee has performed a valuable service to the region and the Alliance applauds these efforts.	CCSC appreciates the recognition.
26	BOT	The Greater Washington Board of Trade is the Greater Washington region's premier business network and the only local business association representing all industry sectors. Through its Green Committee and Potomac Conference, the Board of Trade is actively working to make our region greener and more sustainable while encouraging new opportunities for our region's green economy. ...We look forward to continuing our work with the Council of Governments (COG) to make our region a model for green and sustainable initiatives.	CCSC appreciates the suggestion and concurs with the general statements. No changes made to report.

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		As a general statement, we encourage COG to move forward with greenhouse gas (GHG) reduction measures that are good for the environment, appropriate, achievable, cost effective, good for business and the economy, and uniform across the region.	
27	BOT	The Council of Governments is in the unique position to help coordinate the goals, approach, program recommendations, and implementation of the Maryland, Virginia, and District of Columbia climate change initiatives. A uniform approach to climate change recommendations across the Greater Washington region is important to ensure a level playing field for businesses and their employees. We urge COG to continue its role of regional coordination by working to ensure uniform application of GHG recommendations.	CCSC appreciates the recognition. In the next phase coordination of state and local initiatives for our region is planned. No changes made to report.
28	Waters	The real issue going forward is whether MWCOG should further use its resources to pursue a "climate change initiative." While some regional politicians are among the climate change alarmists, our constituents are facing more pressing daily issues: congestion, high gas prices, foreclosure, gang violence, etc. MWCOG should focus on these issues that actually impact the daily lives of the residents in this region rather than an effort to change the temperature of the planet by a fraction of a degree.	CCSC understands that citizens and institutions in the region are faced with a myriad of important challenges. These are not to be discounted. Developing a response to the global threat of climate change is also important. Attempting to address multiple concerns simultaneously is not mutually exclusive. In fact, there are potential synergies between solutions to different problems. Addressing rising energy costs through conservation for instance may result in a lowering of greenhouse gas emissions from our region. More fuel efficient cars may help to alleviate air pollution. No changes made to report.
29	NVTA	<p>Climate and Energy Policy Change Commission Composition</p> <p>The Alliance recommends that any future committee or commission to develop and oversee policies related to greenhouse gas emissions and climate change not be limited to elected and government officials.</p> <p>Members should include experts from the automobile, construction, energy and other relevant private sector segments qualified to advise on technological and scientific applications most likely to achieve significant greenhouse gas emission reductions.</p>	CCSC appreciates the suggestion. Such a list of potential participants should be considering during the development of the new committee to be established as a result of this report. No changes made to report.

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30	NVTA	<p>It's Called GLOBAL Warming for a Reason The Alliance agrees with the urgency of the need to address carbon emission build-up. It also believes that the region needs an approach that is prudent and cost effective.</p> <p>Concern over the need to move quickly is understandable, but it would be imprudent to move forward with specific measures until the value, effectiveness and cost of those measures are well-documented.</p>	CCSC expects that a more thorough analysis of the costs and benefits of measures will be conducted as the program development process proceeds. No changes made to report.
31	COG Chesapeake Bay and Water Resources Policy Committee	Re COG governance structure for the climate change initiative: The Steering Committee should articulate a role for DW/WW authorities as part of this regional effort.	CCSC appreciates the suggestion. Such a list of potential participants should be considering during the development of the new committee to be established as a result of this report. No changes made to report.
<b>Comments on Reduction Targets</b>			
32	Alexandria	More aggressive reduction targets are needed to solve the global problem.	Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. <b>The report includes a recommendation to review the targets within 5 years.</b> CCSC encourages jurisdictions to adopt more aggressive targets if feasible.
33	Barstow	I urge the MWCOG Climate Change Steering Committee to adopt stronger emission reduction targets than are called for in the draft report. As noted in the draft report, the Intergovernmental Panel on Climate Change (IPCC) projects that stabilizing greenhouse gas concentrations will require emissions reductions of roughly 85% below 1990 levels by 2050. The consequences of climate change demand strong action, and not even trying to meet this challenge would constitute a failure of leadership.	Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. <b>The report includes a recommendation to review the targets within 5 years.</b> CCSC encourages jurisdictions to adopt more aggressive targets if feasible.
34	Fairfax Environmental Coordinator	More generally, the draft Report's recommended goals would result in reductions of GHG emissions that fall below those recommended by the IPCC and which are highlighted on page 21 of the draft Report. This disparity arises due primarily to different baselines: the IPCC uses 1990	Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. <b>The report includes a recommendation to review the targets within 5</b>

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		<p>levels (p.21), while the Report recommends use of 2005 levels (p.7). .. Given that substantial growth occurred in the metropolitan Washington, D.C. area between the years 1990 and 2005, using a 2005 baseline significantly understates the reductions in GHG emissions that may be necessary to stabilize greenhouse gas concentrations.</p>	<p>years. CCSC encourages jurisdictions to adopt more aggressive targets if feasible.</p>
35	Board of Trade	<p>The need for consistency throughout Greater Washington starts with uniform GHG goals and timeframes.</p> <p>At present COG calls for a reduction in GHG emissions of <b>10% below business as usual by 2012; 20% below 2005 levels by 2020; and 80% below 2005 levels by 2050.</b></p> <p>At the same time, the recently completed Maryland Climate Change Commission Report establishes GHG reduction goals as: <b>10% below 2006 base levels by 2012; 15% below 2006 levels by 2015; 25-50% below 2006 base levels by 2020; and 90% below 2006 base levels by 2050.</b></p> <p>Virginia's climate change recommendations will be released in December and the District of Columbia can be expected to provide similar efforts. There is a clear need to have uniform GHG goals and we urge COG to work toward this end through its final report.</p> <p>We further recommend that the COG report include language noting that these goals are subject to adjustment as new technical guidance, federal legislation, or other new information is received and assessed.</p>	<p>While consistency is desirable and CCSC could promote such a goal, it may not be feasible to have all jurisdictions adopt the same targets at this time. This issue should be further examined in the next phase of the planning process after Virginia issues its report in December 2008.</p> <p>Language was added to the report noting that the goals are subject to adjustment as new technical guidance, federal legislation, or other new information is received and assessed.</p>
36	Sierra Club	<p>The Sierra Club agrees that the scale of CO2 emissions reductions recommended by the Steering Committee are in the range recommended by the International Panel on Climate Change (IPCC) – though we note that the IPCC acknowledges uncertainty, and most recently reports that CO2 concentrations in the atmosphere are increasing more rapidly than previously estimated, suggesting that even greater reductions of emissions</p>	<p>Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. The report includes a recommendation to review the targets within 5 years. CCSC encourages jurisdictions to adopt more aggressive targets if feasible.</p>

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		are necessary.	
37	Johnson	A regional cap should be developed that is linked to the necessary CO2 emission levels (i.e., global cap) that would work to stabilize global CO2 concentrations in the atmosphere.	CCSC believes that directly linking a regional program to global CO2 concentrations may not be feasible at this time. No changes made to report.
38	Johnson, Bailey	Early action is critical to avoiding serious climate change.	Agreed. CCSC is recommending that as the climate change program is implemented mitigation measures be prioritized, including options for early action. Text was also added to the report to highlight the importance of early action.
39	Sierra Club	We observe that both Virginia and Maryland have expressed CO2 reduction goals in terms of a 2006 base year (table 3, pg. 30). The Steering Committee, in contrast, uses 2005 as a base year (Figure 11, pg 34). All things being equal, it would be advantageous for COG's analysis to conform to the baseline used by the jurisdictions if the objective is to provide useful assistance and advance coordination among the jurisdictions.	CCSC believes that it is not feasible at this time for the report to be revised to include a new inventory base year of 2006 for consistency purposes only. As the program proceeds, if requested, staff can develop a new 2006 base year inventory for the region and readjust the projections as needed. No changes made to report.
40	Chesapeake Bay Foundation	<p>Re recommended GHG reduction goals: While certainly representing movement in the right direction, we believe the science on climate change warrants a more aggressive approach.</p> <p>For one, the short term 2012 goal would not result in any substantial GHG reductions from current emissions levels. We must act aggressively, now, to reduce emissions for both scientific and political reasons....</p> <p>COG's proposed short-term (2012) goal is not as strong as others in the region. We urge that the initial COG goal should be at least as strong as the strongest of these other near-term targets.</p> <p>Our recommendation would be that COG consider adopting goals similar to what has been advocated by the Maryland Commission on Climate Change, a reduction of 25 to 50% below 2005 levels by 2020 and by 90 percent below 2005 levels by 2050.. A more aggressive long-term goal is consistent with the recommendations of the IPCC that suggest that to stabilize greenhouse gas concentrations, carbon emissions will have to be reduced by as much as 85% by 2050 below 1990 levels.</p>	Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. No changes made to report.
41	Fairfax Environmental	The report's executive summary says (p. 7) the goals are based on	Given a number of different considerations (e.g., existing

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	Coordinator	scientific evidence from the [IPCC]. Yet it also says (p. 21) the IPCC projects a requirement for global reduction in greenhouse gas emissions of 50-85 percent below 1990 levels by 2050... The goal of an 80 percent regional reduction in GHG emissions below 2005 levels by 2050 seems insufficient to meet that requirement.... It would appear, therefore, that an 80 percent reduction in regional GHG emissions below 2005 levels by 2050, even if the whole country were to make that target, is nowhere near enough to achieve the temperature stabilization goal.	commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. No changes made to report.
42	Fairfax Environmental Coordinator	The report does not emphasize, or even mention (maybe because it does not recognize) that the straight-line reduction projected in fig. ES-4 on p. 8 and fig. 10 on p. 31 requires incremental reductions in each decade that will likely become vastly more expensive and difficult in those later years, and that the far-term goals therefore require substantial attention now to develop the necessary technologies or to condition the needed behaviors... The report should emphasize that serious planning and investment are required starting now for this strategy to succeed.	Even though fig. ES-4 on p. 8 and fig. 10 on p. 31 show same amount of reductions required for each decade during 2020 and 2050 to achieve the 2050 reduction target of 80% below 2005 level, the report does not emphasize this approach. Instead, the report recognizes the benefits of early emissions reduction as it will be both cost-effective and more protective for the climate. For this reason, a new description is being added in the report to emphasize an early implementation of emissions reduction measures and efforts towards changing human behavior for the climate change strategy to be more cost-effective and successful.
43	Bailey	I strongly support the report's goal of 80% greenhouse gas reduction by 2050 and would like to see incentives put in place for achieving these results as soon as possible.	CCSC appreciates the recognition and support.
44	Bailey	It is important to reduce emissions of methane. Second, Table ES-1 is has completely overlooked the short-term potency of methane. Methane is 72 times more potent than CO2 over the next 20 years (IPCC, 2006). Therefore, reducing or eliminating methane now will have 72 times the impact of reducing CO2 emissions. This means methane abatement and elimination should be a short-term priority, not a mid-range to long-term plan. Similarly, other non-CO2 gases such as N2O, SF6 and HCFCs should be an immediate priority because they offer the largest payback and we need to act as quickly as possible.	Agreed. While CCSC agrees that methane and high-Global warming potential (GWP) gases are important to control, the majority of emissions (>95%) in the region result from consumption of fossil fuels. Control of non-CO2 gases will be given further consideration in the next phases of the planning process. No changes made to report.
45	ASLA	The American Society of Landscape Architects commends the Metropolitan	Agreed. No changes made to report.

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		Washington Council of Governments for its commitment to this critical issue and its efforts to create a multifaceted, comprehensive plan to reduce greenhouse gases (GHGs) and mitigate the impacts of climate change in our region. The targets for GHG reduction in this plan are commendable. ASLA recommends that the MWCOG regularly review these targets to seek opportunities to accelerate the reductions when new innovations and technology make stronger cuts in GHG emissions possible.	
46	NVRC	A system should be devised to readjust targets based on the future situation with regard to global emissions and global CO2 concentrations. The report also should include specific language calling for the constant monitoring and verification of greenhouse gas emissions and alignment with any recommended goals and targets. In this context, clear, reliable metrics must be used to determine goals and to assess performance.	Agreed. The report includes a recommendation to revisit targets within 5 years.
47	Alexandria	Alexandria recommends the greenhouse gas emissions reduction targets be revisited by COG and CCSC periodically to determine if different targets are warranted in light of new scientific data. This becomes even more important as some of the newer data indicates that GHG reduction targets need to be even larger than originally suggested.	Agreed. The report includes a recommendation to revisit targets within 5 years.
48	Fairfax Environmental Coordinator	"A consensus of IPCC and U.S. scientists is that greenhouse gas emissions must be reduced by 50-85 percent by 2050 to avoid the dire consequences of global warming." However, Figure 12 on page 35 suggests that the goal for 2050 should be the same level of emissions as is being produced today. Clarification is needed.	Agreed. The chart was only included to illustrate the concept of wedge analysis for stabilization of emissions. Text was added for clarification.
49	Kinsman	1 – I think the report should be more explicit in describing and comparing the 2012 target of a 10% reduction to the 2020 target. There are two key points to make here. First, while the 2020 target is characterized as a 20% reduction from 2005, in reality it is a 35% reduction from 2020 BAU. Second, this is a huge reduction in just 8 years (from 2012 to 2020). Can we go from a 10% reduction in 2012 to a 35% reduction in 2020? Is this really feasible? I am not sure these points are clear to the readers and planners and regulators. I suggest that the text and Figure ES-4 require modification.	Given a number of different considerations (e.g., existing commitments, challenges faced by certain jurisdictions), CCSC believes the recommended targets are appropriate at this time. The report includes a recommendation to revisit targets within 5 years. No changes made to report.

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50	Waters	The assumption of both the IPCC and the Report is that taking drastic action by changing human behavior will result in lowering global temperature. The Report proposes reducing greenhouse gas emissions to 80% below 2005 levels by 2050. What assurances do we have that such reductions will in fact produce lower temperatures? None. Even implementing the Kyoto Protocol Treaty, the gold standard of carbon restrictions, would only reduce global temperatures by 0.13 degrees Celsius over the next century, according to Dr. Tom Wigley, a senior scientist at the National Center for Atmospheric Research. Reference: Inhofe, Senator James. "Global Warming: The Worst of All Environment Scars." <u>Human Events Online</u> . 6 Aug. 2003.	Given a number of different considerations (e.g., scientific recommendations, recommended reductions from regional jurisdictions), CCSC believes the recommended targets are appropriate at this time. CCSC does not believe there needs to be absolute certainty between the proposed reductions and the global impact in order for the region to be confident that it is making the correct decision to develop an effective response. No changes made to report.
51	Chesapeake Bay Policy Committee	Work with the region's WW/DW facilities to identify potential reductions and/or offsets; and incorporate "life cycle" analysis to evaluate "net" environmental impacts.	CCSC agrees that WW/DW facilities should be included in the regional inventory. Future topics for research include potential reductions from these facilities with an evaluation of costs and benefits.
<b>General Comment on Mitigation Measures</b>			
52	MWAQC	MWAQC believes that the higher temperatures, longer heat waves, and change in precipitation patterns could have significant negative consequences for air quality. Recent studies suggest a potential 2 to 8 ppb ozone penalty from climate change in the Mid Atlantic, with associated health impacts on sensitive individuals in the region.... In particular, MWAQC encourages all local jurisdictions in the region to begin to develop policies and programs to reduce emissions from all sectors in the jurisdiction.	CCSC shares the concern about the impact of global warming on air quality and appreciates the suggestion for early action across all sectors. The report includes acknowledgement that air quality could be impacted by climate change. No specific changes made to report.
53	MWAQC	Steps to reduce greenhouse gas emissions may provide significant air quality benefits. To this end, MWAQC urges stakeholders in the region to leverage investments and adopt technologies and practices that provide multipollutant benefits. In particular, MWAQC supports and encourages many of the recommendations listed in the report, including enhancing alternative modes of transportation, purchasing low-emitting vehicles, developing low-carbon fueling infrastructure, developing Green Building	CCSC appreciates the suggestion for actions that provide multi-pollutant benefits and anticipates that such approaches will be considered as more specific plans are made for meeting the reduction targets. <b>Text was added to report including additional information on co-benefits.</b>

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		policies, enhancing tree canopy, and investing in energy efficiency and renewable energy.	
54	MWAQC	MWAQC believes that some of the more important short-term actions include implementing the recommendations in the statewide Climate Action Plans being developed by Maryland, Virginia, and District; working with the Public Service Commissions and utilities to ensure equity in the region's Renewable Portfolio Standards; developing a regional high efficiency street lighting project; and seeking commitment of local jurisdictions to purchase 20 percent of their electricity needs from renewable Green Power. In addition, it will be important to take early action to focus on ways to address the existing built environment (e.g., energy efficiency retrofits, recycling building materials during renovation), as well as land use changes that could facilitate access to transit, jobs, and green housing. MWAQC also believes that public education and outreach will be critical component of any plan to reduce emissions of greenhouse gases.	CCSC appreciates the support for the recommendations in the report. No specific changes made to report.
55	Chesapeake Bay Foundation	We should note that many of the actions that are recommended to address climate change, especially those related to land use, also address other objectives being promoted by most of our local governments and by our respective states – e.g., advancing land and water conservation to a higher level. We need to assure that both the funding and the programs or policies remain (or are put in place) that will allow us to reach these lofty climate change goals – especially during challenging economic times.	Agreed. No changes made to report.
56	Sierra Club	Sierra Club Comment #12: Sierra Club recommends that the COG Climate Change Program explore their regional role in developing strategies for financing the shift to clean energy and reduced reliance on CO2 generating transportation in the region.	Agreed. No changes made to report.
57	Sierra Club	The discussion of Socolow & Pacala's prescription for holding CO2 emissions flat to the 2005 level, presented on pg. 35, is out of step with the rest of the section, and the report generally. Sierra Club Comment #1: Sierra Club recommends this section be revised to clearly illustrate how a mix of CO2 reduction strategies can be assembled as "wedges" to collectively approach the 2050 target for CO2 reduction. The section should	The graph was included as illustrative of the wedge concept. <b>Text was added to the report for clarification.</b>

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		communicate a need for regional study and coordination across the entire range of CO2 reduction strategies.	
58	Sierra Club	Sierra Club Comment #2: Sierra Club recommends that the Report highlight the need for a regionally-based analysis of CO2 abatement information concerning cost-effectiveness and benefits; and that the McKinsey findings be presented as illustrative, with discussion noting that various assumptions, such as cost for construction of energy production facilities and risk insurance may reorder the cost-effectiveness of the cited technologies.	CCSC believes that more in-depth analysis of cost effectiveness, including consideration of appropriate thresholds, will be conducted during the next phases of the planning process. The abatement curve was included as illustrative example. The report includes recommendation for analysis of cost effectiveness. No changes made to report.
59	Sierra Club	<p>Cost/Effectiveness/Benefit</p> <p>The recommendations for a proposed COG Climate Change Program on pg. 77 include "Evaluate recommended greenhouse gas reduction measures for cost effectiveness." Sierra Club is wary of this provision because assumptions made as to baselines for the analysis can be skewed and effectively obscured to bias the result....</p> <p>Sierra Club Comment #3: Sierra Club recommends that the report clearly state that public participation in the development cost-effectiveness and benefit studies be mandatory to ensure the assumptions that govern them receive a full and complete public airing; and that the cost of "business as usual," as well as the collateral benefits of other air and water pollution abatement, be included when considering the baseline against which costs are compared in any benefit analysis.</p>	CCSC appreciates the observations and suggestions and anticipates that such considerations can be made during the next phase of the planning process. No changes made to report.
60	Alexandria	The report should expand the section on "Cost of Meeting the Targets" to include quantitative data on the capital expenditures required to implement the 78 recommendations. At a minimum, it should address costs for achieving short term goals outlined by this report.	CCSC anticipates that more in-depth analysis of costs will be conducted during the next phase of the planning process. No changes made to report.
61	NVTA	Important Questions Remain Unanswered. Despite significant and commendable progress in the past year, answers to arguably the most important questions and factors remain elusive. Key matters that need to be addressed before a reasonable regional greenhouse gas reduction policy	CCSC anticipates that more in-depth analysis of costs and benefits will be conducted during the next phase of the planning process. No changes made to report.

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		<p>can be formulated include: Identifying specific policies and actions that are most likely to reduce carbon dioxide emissions by the greatest amount; Determining what these measures will cost and the benefits associated with each; and Determining to what extent scientific or technological advances are likely to account for most carbon dioxide reductions versus human behavioral changes.</p>	
62	NVTA	<p>Cost Benefit Ratio Analysis Required Before Proceeding. The Draft states “The emission reduction benefits and costs also vary greatly, as well as economic co-benefits associated with many of the initiatives. The financial feasibility of many of the recommendations and establishment of priority rankings still is to be conducted.” The Alliance agrees and urges the Steering Committee to quantify benefits and costs in advance of assigning priorities and formulating a regional strategy.</p> <p>Recommendation assessment tables in the Draft refer to benefit levels as low, medium, high, etc., but offer no indication as to how these designations translate into emission level reductions. More definitive information is needed.</p> <p>The Draft acknowledges that estimated gains due to the Energy Security Act of 2007 have not been calculated. Such calculations need to be performed prior to adoption of a final regional strategy.</p>	<p>CCSC anticipates that more in-depth analysis of costs and benefits will be conducted during the next phase of the planning process. The impacts of recent federal and state legislation affecting efficiency will be assessed. CCSC does not believe that a complete data set of costs and benefits is required in order to identify and implement certain near-term measures that are known to make good economic sense (e.g., many energy efficiency investments). No changes made to report.</p>
63	NVTA	<p>Technological Advances vs. Behavioral Changes – Benefits Differ The Draft appears to imply that potential benefits of technological and scientific advances are comparable to policies related to behavioral and societal changes. However, experience with ground level ozone demonstrates that technological breakthroughs are more likely to result in greater reductions than behavioral changes and at less cost.</p> <p>While it is understandable that the Committee Report may not be able to quantify such progress at this time, it should at the very least acknowledge</p>	<p>CCSC understands that technology innovations may contribute significantly to the solution. The report does include reference to the possibility of changes in technology. The report also acknowledges the significant impact of behavior. For example, initial estimates suggest that one of the most cost effective measures to address emissions from transportation is teleworking. By comparison, some technology options to reduce emissions from automobiles may have very high costs. CCSC believes there may not be one solution and that behavioral changes, especially in the short term, and technology</p>

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		that significant future technological advances are likely to result in far greater reductions than are assumed at this point.	changes in the longer term are required. Behavioral changes will be needed to meet shorter term goals while technology changes will be critical for meeting the 2050 goal. No changes made to report.
64	NVTA	Re-Consideration of Executive Summary Conclusion The Alliance asks that the Committee edit the final sentence of the Draft's Executive Summary to the importance of focus on the most cost effective measures...In short, the initial focus of a regional greenhouse gas reduction strategy should be on measures known to be cost effective and should not go beyond that point until other cost effective measures are developed.	CCSC anticipates that more in-depth analysis of costs and benefits will be conducted during the next phase of the planning process. CCSC does not believe that a complete data set of costs and benefits is required in order to identify and implement certain near-term measures that are known to make good economic sense (e.g., many energy efficiency investments). No changes made to report.
65	Fairfax Board	The report and/or the CCSC effort should strive to identify the legislative needs that would enable implementation of mitigation and adaptation measures.	Agreed. This will be a high priority during the next steps in the planning process. <b>The report organizational structure has been revised to more clearly identify advocacy positions.</b>
66	BOT	Wherever possible, the goals of reducing vehicle miles traveled, retrofitting existing buildings for greater energy efficiency, production and usage of renewable energy and other GHG reduction measures should be approached by offering incentives.	Agreed. This will be a priority during the next steps in the planning process. No changes made to report.
67	College Park	Measures should be identified that can be applied uniformly throughout the region. Example: Regional Street Light Efficiency Project.	Agreed. This will be a high priority during the next steps in the planning process. No changes made to report.
68	College Park	Local and State Government Measures should be identified to spur development of new Green Markets.	Agreed. The report does contain suggestions for cooperative purchasing and development of green jobs and services. Such initiatives will be important during the next steps of the planning process. No changes made to report.
69	AQPAC	We look forward to the next iteration of this analysis, which should include not only estimates of greenhouse gas reductions due to specific measures, but also analysis of the synergies or tensions between the measures. For example, a jump in efficiency of vehicles is likely to yield a rebound effect, stimulating more travel and cutting into any measures designed to reduce vehicle miles traveled. On the other hand, should revenues from road pricing be directed to improving transit service these measures should complement one another, yielding a larger overall result vis-à-vis travel demand management.	Agreed. No changes made to report.

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70	AQPAC	There are some creative economic incentives missing from the list of possible measures, specifically road pricing (tolling, congestion pricing) and decoupling, and measures covering aviation and intercity rail. These should be considered as part of the mix.	Agreed, the report was revised to include additional information on economic incentives.
71	Chesapeake Bay Foundation	As the proverbial "800 pound gorilla," the federal government must be importuned via our representatives in Congress and COG's on-going relationship with the General Services Administration to continue to improve the performance of its own fleets and facilities along the lines of 15% reduction by 2012, i.e., a slightly longer-term 2020 goal of 30% reduction.	Agreed. CCSC hopes that the federal government will do more to provide effective solutions to this problem, in the region and nationally. Federal participation on the new committee will be solicited.
72	TPB	The report references the 2007 McKinsey & Company study, which identifies a price threshold of \$50 per ton of carbon dioxide abated. This threshold signals the point at which McKinsey & Company believe that the nation's emissions reduction goals can be met, and suggests that strategies with cost-effectiveness values far above this point would incur unnecessarily high costs unless they generate significant other benefits....it provides a useful initial "value per ton of carbon dioxide reductions" for use in cost-effectiveness and cost/benefit analyses. In addition, the ultimate selection of strategies should recognize that some strategies are easier for the region's local governments to control than others.	Analysis of cost effectiveness, including consideration of appropriate thresholds will be a part of the next steps of the planning process. No changes made to report.
73	Slabinski	<p>There is a certain unreality or incompleteness in many of the report's recommendations. The consequences need to be spelled out in explicit detail.</p> <p>If you want to decrease Vehicle Miles Traveled,... then the Steering Committee should come out against building new highways. Perhaps the Virginia Legislature this past spring took the correct course for the climate by not providing money for Northern Virginia highways.</p> <p>The Steering Committee should also encourage taxes to keep the cost of gasoline above \$4 per gallon since that price level has done much to discourage the sale of SUVs (p.31 [pdf p.37]) and induced people to restrict their travel, all without a lot of regulations or government programs....</p>	Analysis of the impact of measures will be a part of the next steps of the planning process. No changes made to report.

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		If more people start taking public transportation to work instead of driving (recommendation 15, p.13 [pdf p.19]), where is the money coming from to buy additional buses and subway trains? Metrorail trains are already jammed full of passengers during rush hour. Note that Metro already needs \$11 billion over 10 years for necessary, current maintenance of its rail system, and is not sure where that money is coming from.	
74	Keller	The report should include more focus on reducing emissions from the aviation sector. A variety of technology and operational suggestions were provided.	Agreed. COG facilitates two relevant workgroups focused on emissions from the aviation sector. In addition to a voluntary airports initiative focused on air quality improvements, COG has recently been developing a Green Airports Initiative. Recommendations from these workgroups could become an integral part of any climate-related recommendations from the CCSC. <b>A general recommendation was added to the report.</b>
75	Bailey	The opportunities for avoiding methane from landfills are not solely from incineration. In fact, not only can methane from landfills be avoided, carbon storage can be enhanced through local composting programs. Carbon loss from soils was one of the leading sources of GHG emissions until the 1970s. Composting avoids methane, stores carbon, enhances local food production, improves biomass growth, increases drought resistance and provides other myriad benefits. The important climate, environmental and economic reasons for community investments in composting are best synthesized at <a href="http://www.cool2012.com">www.cool2012.com</a> .	Agreed. While CCSC agrees that methane is important to control, the majority of emissions in the region result from consumption of fossil fuels. CCSC expects methane reduction will be an integral part of future plans to meet the reduction targets. Some text was added to the report noting the importance of early action. No other changes were made to report.
76	Fairfax Board	There are possible barriers to the recommendation for land application of biosolids that need to be considered.	CCSC appreciates the suggestion to consider the barriers to land application of biosolids and expects such issues will be considered during the next steps of the planning process. No changes made to report.
77	Bailey	...energy and transportation are not the only big players in the climate change game. Goods and services, and the waste that goes along with them, are significant contributors as well. While this climate report does some to raise the issue of increasing population in the National Capital Region, it does little to address how rising consumption rates, even with a stable population, will diminish any savings we accrue from increased	CCSC agrees that the imbedded emissions in goods and services need to be considered. Such issues may be considered during the next steps of the planning process. No changes made to the report.

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		<p>efficiency. Further, it largely ignores, except for token references, the connection between wasting and climate change. Another recent report, Stop Trashing the Climate, found wasting is linked to more than 36% of our nation's greenhouse gas emissions and that immediate investments in reducing waste, composting and recycling are the fastest and most effective first steps toward protecting our climate. More on this can be found at <a href="http://www.stoptrashingtheclimate.org">www.stoptrashingtheclimate.org</a>.</p>	
78	Sierra Club	<p>Waste disposal has been linked to more than one-third of all U.S. greenhouse gas emissions. The discussion of waste management in this section is incomplete and as a result misleading.... Sierra Club Comment #4: Sierra Club strongly recommends that the Steering Committee report more thoroughly consider the implications of material life-cycle analysis, and proven waste reduction policies before concluding that waste combustion reduces CO2 emissions to a greater degree than does comprehensive recycling and processing of the waste stream for recovery and composting. For additional information on this thesis, review this publication: <a href="http://www.stoptrashingtheclimate.com/fullreport_stoptrashingtheclimate.pdf">http://www.stoptrashingtheclimate.com/fullreport_stoptrashingtheclimate.pdf</a></p>	<p>CCSC agrees that material life-cycle analysis would provide valuable information. This will be the subject of future work.</p>
79	Waters	<p>Cap and trade systems are inherently deceptive. The name itself is misleading because it is essentially a carbon tax. In fact, according to the Report, "Cap-and-trade and/or carbon tax programs are widely being discussed as possible options for reducing overall U.S. greenhouse gas emission" (p. 39). Companies will be taxed on their emission of carbon-based fuels (oil, coal, natural gas). That cost will be passed on to the consumer, adding another expense to the stretched family budget.</p> <p>... I believe that MWCOG should not promote or facilitate implementation of any carbon tax or cap and trade recommendation.</p>	<p>CCSC appreciates the observations and hopes such consideration can be given more attention during the next phase of the planning process, as well as in Congress to address the problem nationally. CCSC believes that expanding the RGGI cap and trade system to DC and Virginia is appropriate. However, it has taken no position on establishment of an economy-wide national or regional cap and trade system. CCSC does not believe that forcing energy scarcity is the strategy embraced by this report. No changes made to report.</p>
80	Waters	<p>There is a significant difference between voluntary actions or suggestions and passing laws or forcing new mandates. If the result of these recommendations is aimed at increasing my constituents' energy costs or limiting their consumer choices, I will not support such recommendations. ...I don't think my constituents would like their tax dollars to be used in a</p>	<p>CCSC understands the value in voluntary approaches and respects individual choice. However, in certain instances, it is reasonable and has been a longstanding role of government to set the mark that industry sectors, business, or individuals must meet to achieve the desired social goal of high standards (e.g., appliance efficiency</p>

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		manner by their government or quasi-governmental entity to judge their behavior when it comes to energy usage.	standards, building codes). No changes made to report.
81	Waters	While I do not buy in to the IPCC "climate change" consensus, I am supportive of energy efficiency, energy diversification (drilling in the U.S., solar, wind, nuclear, bio-fuel, etc.), and ending dependence on foreign oil. Some of the suggested actions in the Report also support these goals, and therefore, I support such voluntary recommendations.	CCSC appreciates the comment and agrees that many of the recommendations make sense regardless of their role in providing a solution to climate change. No changes made to the report.
82	Waters	The head of the IPCC, Rajendra Pachauri, has even gone as far as recommending that people have one "meat-free" day each week, which has further sparked this global debate. If the IPCC promotes it in the name of "climate change," will COG also? The residents of the Washington region are looking to COG to help solve real life regional issues from transportation issues like bus systems that connect across jurisdictions and roadway congestion to public safety concerns such as spreading gang violence and emergency preparedness.	While many believe that eating less meat can be good for the environment and public health, CCSC does not advocate such an approach for solving climate change.
<b>Comments on Taking Action: Energy</b>			
83	NVRC	More specific targets are needed for local government purchase of renewable power. We suggest being more specific with recommendations for the purchase and production of renewable energy in the region. The existing language is still too vague.	The report includes a specific recommendation for local jurisdictions, as well as state and federal government, to purchase 20 percent of electricity from renewable sources. CCSC is confident that renewable energy purchases will be a major component of the region's plans to meet the reduction targets. No changes made to the report.
84	Chesapeake Bay Foundation	While a number of objectives in the Draft Climate Action Report related to making local government operations more efficient, we must all recognize that a very small percentage of GHG emissions comes from this sector -- according to COG figures, only about 3.8%. We believe that a more ambitious goal should be set for local government energy use in addition to the 15% reduction by 2012, i.e., a slightly longer-term 2020 goal of 30% reduction.	CCSC appreciates the suggestion. The local government energy recommendations were developed based on significant input from local governments and are deemed to be reasonable at this time. CCSC anticipates that success in meeting targets will vary across different jurisdictions, with some jurisdictions exceeding the goal. No changes made to the report.
85	NVRC	A regional renewable energy inventory should be developed. In that	CCSC appreciates the suggestion to develop a regional renewable

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		context, we suggest gathering and inventorying data reflecting current renewable energy production in the region – specifically, solar, solar thermal, geothermal heating and cooling, district heating, wind and biofuels. Thus, the report could include suggestions for local authorities to start tracking renewable energy production in the region.	energy inventory and anticipates that such an initiative could be developed by COG in coordination with local and state energy managers and utilities. <b>Recommendation added to report.</b>
86	Gailey, College Park	Renewable energy capacity should be installed at schools. Recommend more solar on flat roofs, canopies in parking lots, cooperative purchase of solar equipment.	CCSC appreciates the suggestion for increased deployment of solar energy technologies. <b>Recommendation added to report.</b>
87	Sierra Club	Section 7 It is important to note, and there should be a place in the Report to illustrate, how technological efficiency since 1970 has essentially equaled the amount of new energy production in the U.S. to meet increased demand. This demonstrates the capacity for and importance of conservation and technological efficiency for addressing climate change. A comparison of per capita electricity consumption between best performing states and/or urban areas, and our own, impresses people with how much can be achieved without sacrificing one's life style.	<b>Agreed. The report was revised to reflect this suggestion.</b>
88	College Park	A regional street lighting standard should be developed.	CCSC appreciates the suggestion. There are efforts underway through COG to develop a street lighting program in the region. Such a recommendation should be considered by the group leading this effort. No changes made to report.
89	NVRC	We suggest the need for community energy plans – plans that bridge large-scale applications of green buildings, renewable energy, transit-oriented development within defined geographic boundaries in the region. Guelph, Ontario, has developed a model community energy plan that borrows heavily from domestic and international best practices with application to the Washington region. The link has been attached. Guelph, Ontario - <a href="http://guelph.ca/uploads/ET_Group/admin/CEP_report_web.pdf">http://guelph.ca/uploads/ET_Group/admin/CEP_report_web.pdf</a>	CCSC appreciates the suggestion for more focus on community energy planning. <b>Recommendation added to report.</b>
90	NVRC	The report should include more information on district/renewable heating and cooling. Page 42 (District Heating). Can there be a specific reference to importance and value of district heating and renewable heating and	CCSC appreciates the suggestion to provide information on the value of district heating/cooling. <b>Text added to report.</b>

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		cooling systems?	
91	AQPAC	The report should note that there would be additional benefits if the Commonwealth of Virginia adopted a Mandatory Renewable Portfolio Standard.	CCSC agrees that a mandatory standard could make the projected benefits of a Renewable Portfolio Standard more dependable. The report includes a recommendation for adoption of a 20 percent Renewable Portfolio Standard in Virginia.
92	Chesapeake Bay Foundation	CBF believes that the recommendation in the draft version of the COG plan concerning COG's policy for achieving LEED-"certification" or better for all private sector commercial building was, again, not ambitious enough. .. We recommend that (Leed Gold Standard) it be advocated to COG member jurisdictions for adoption as the standard or, at worst, the goal by that time. (2012 or 2015)	The IGBG is the COG workgroup that will need to consider this recommendation. CCSC understands that the LEED point scoring system may be revised soon to include more requirements for energy conservation. No changes made to report.
93	Fairfax Environmental Coordinator	On pages 40 and 47, strengthening of building codes (e.g., "establishment of strong Green Building codes region-wide") is suggested. It should be recognized that, in Virginia, this will require action at the state level rather than at the local government level.	CCSC appreciates the suggestion to clarify the text in the report. <b>Changes were made in response.</b>
94	Debra Jacobson	p. 39 Substitute for second par. – 3rd sentence – "In the near-term, energy efficiency is the cheapest, fastest, and cleanest way to reduce greenhouse gas emissions, and therefore, this approach should receive priority attention. In fact, certain energy efficiency investments can actually provide cost savings to consumers. Cost-effective renewable energy technologies, such as wind power, offer substantial potential in the short-term, and advances in solar energy technologies are expected to substantially reduce costs within the next five years." (cite the 2006 report of the National Action Plan for Energy Efficiency and the Sept. 19, 2008 report of the American Council for an Energy-Efficiency Economy on Energy Efficiency in VA - complete copies of "Energizing Virginia: Efficiency First" can be found online at <a href="http://www.aceee.org/pubs/E085.htm">http://www.aceee.org/pubs/E085.htm</a> )	CCSC appreciates the suggested text edit. <b>Changes were made in response.</b>
95	Debra Jacobson	p. 40 Emphasize the importance of building codes. See Sept. 19, 2008 ACEEE report and review the Building Code Assistance Project of the Alliance to Save Energy ( <a href="http://www.bcap-energy.org/">www.bcap-energy.org/</a> ). p. 45 Since energy efficiency is only one of several factors considered by LEED, mandatory strengthened building codes create greater benefits.	CCSC agrees that strengthening building codes will be an important strategy to pursue. An examination of building codes and the possibility of strengthening should be considered during the next phase of the planning process.

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		p. 45 – EC & E – third bullet - stronger building codes for the private sector – should not limit action to simply incentives and outreach	
96	Debra Jacobson	p. 45 EC & E – 4th bullet – wording should be stronger than “explore” and best practices. Should “encourage” State and DC PUCs to develop and implement EC & E programs.	Text was added to report recommending development of energy efficiency and conservation programs by the utilities and PUCs.
97	Debra Jacobson	p. 46 7th bullet - Local government – carbon neutrality is excellent but should be a requirement not simply a goal. This policy should apply rather than applying potentially weaker LEED silver goal for new buildings.	Given the complexity of this issue, keeping the current recommendations is the most appropriate course of action at this time. As the plan to meet the 2020 goal is developed, issues such as carbon neutrality should be considered.
98	Debra Jacobson	p. 47 RE – too vague to simply urge the Region to act as a leader – suggest discussion with Matt Clouse of the EPA Green Power Partnership to help spell out some specific programs. Also, look at the book Apollo’s Fire by Congressman Jay Inslee and Bracken Hendricks.	CCSC believes that the recommendation is appropriate at this time. Ongoing planning activities at COG are looking more closely at and fostering specific programs in the region. Text was added to the report about the need to inventory renewable resources in the region.
99	AQPAC	<p>Page 8, 2nd paragraphs: We suggest that the heading “Strategy to Modify Energy-Consuming Behaviors” be changed to “Strategy to Provide Energy Conservation Incentives.” We believe that it is important to emphasize the importance of individual actions to reduce emissions. We have a substitute paragraph below:</p> <p>Strategy to Energize and Incentivize Energy Conservation Energizing households and businesses to make energy conserving choices offers a potentially significant impact for greenhouse gas reductions. Individuals and businesses can make simple choices to conserve energy by their driving, purchasing, heating and cooling in the home and workplace and lessening the amount of trash disposal. Opportunities for education and outreach that provide reasons to make changes include educating consumers to purchase wisely, recycle more, and throw away less. Helping business consumers, government consumers, and household consumers to purchase more energy-efficient cars, appliances, heating and air</p>	CCSC appreciates the suggested text edit. Changes to the report were made in response.

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		conditioning technologies and to look for alternatives that consume less energy, are lasting or reusable is a shared responsibility. Providing the information, education and insistence that consumer products are safe and sound, businesses, governments, and households can work together to do their part for reducing greenhouse gases.	
100	NVRC	The report should include information on the total energy produced by recovered methane at wastewater treatment plants. Page 41 (Methane Recapture). Is it possible to collect and display the number of MW hours produced via methane recapture at the region's wastewater treatment plants?	CCSC appreciates the suggestion and anticipates such analysis could be carried out during the next steps of the planning process. No changes to report.
101	Johnson	All fossil-fuel burning equipment needs to be phased out.	CCSC appreciates the suggestion to phase out all fossil fuel burning equipment. CCSC does not believe that such a recommendation is a feasible course of action at this time, but hopefully new technology will become available in the coming decades to help achieve the commenter's desired goal. No changes to report.
102	Mathwin	A voluntary push mower/gas mower trade in program should be developed.	CCSC appreciates the suggestion and is aware that Clean Air Partners is currently working to develop such a program. No changes to report.
103	College Park	Potential geothermal energy use impacts on groundwater should be addressed.	CCSC appreciates the suggestion and anticipates such an analysis could be considered during the next steps of the planning process. No changes to report.
104	NVRC	Page 43 (Energy Audits). There is a need for full disclosure of energy audits and the performance and effectiveness of any retrofit actions that are conducted.	CCSC appreciates the suggestion and anticipates such needs could be considered during the next steps of the planning process. No changes to report.
105	Slabinski	I am pleased to see recommendation 13 for a regional street lighting analysis...But besides the method of generation, there should also be a recommendation mandating full cutoff fixtures (no globe-type lamps). That means no light is wasted by emission above the horizontal, toward the sky, to no purpose. There should also be a limit on ground level illumination.  The analysis and regulations should also include shopping center parking	CCSC appreciates the suggestions. As a regional street lighting initiative is planned and implemented, such suggestions should be considered by stakeholders. <b>Minor edits made to the report recommendations to reflect the suggestions.</b>

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		lots and gasoline service stations. The tendency is for service stations (for example) to increase their lighting levels above that of nearby competitors. As each station increases its outdoor lighting, energy use and corresponding Greenhouse Gas production increases. This escalation of outdoor lighting must stop.	
<b>Comments on Taking Action: Transportation and Land Use</b>			
106	MWAQC	To reduce emissions from the transportation sector, MWAQC urges the CCSC to more closely collaborate with the National Capital Region Transportation Planning Board to determine the most cost effective ways to increase fuel efficiency of the region's fleets, increase available and use of alternative fuels, and to improve the efficiency of the transportation network.	Agreed. The report includes such collaboration with the TPB. No changes made to report.
107	Alexandria	Re:the connection between urban sprawl and greenhouse gas emissions. This requires the regional transportation planning bodies in our metropolitan areas to adopt, as part of their regional transportation plan, a "sustainable community strategy" (i.e., transit-oriented, mixed-use, etc.) that will meet the region's target for reducing GHG emissions and incentivizes sustainable community strategies by allocating federal transportation funds only to projects that are consistent with the emissions reductions.	CCSC appreciates the suggestion. During the next phase of the planning process, as well as the TPB What Will it Take Scenario study, issues of urban sprawl and greenhouse gas emissions will be considered. Sustainable community strategies are part of a concept introduced through the California state law SB 375. The content and application of this law will be presented and discussed at the next TPB meeting on October 15, 2008. No changes made to report.
108	Alexandria	COG member jurisdictions, a mix of urban and suburban communities, will be making efforts in their own ways to address and reduce GHG emissions. As a region, obviously there will be efforts to reduce urban sprawl via the promotion of smart growth techniques such as transit-oriented and mixed-use development. Such policies will promote higher density growth in certain localities resulting in GHG reduction goals in those communities more challenging although the growth was considered a smart growth. This issue should be acknowledged, analyzed and reflected in the report.	Smart growth and transit-oriented development are discussed in the report. The report identifies TOD as the preferred growth strategy. CCSC anticipates that continued focus on such strategies will occur. No changes made to report.
109	Chesapeake Bay Foundation	We urge COG to help its member jurisdictions commit to and undertake such crucial GHG-ameliorating actions as aggressively moving forward with TOD-encouraging policies – which the best contemporary studies have	Transit-oriented development is discussed in the report. The report identifies TOD as the preferred growth strategy. CCSC anticipates that continued focus on TOD will occur. No changes made to report.

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		shown can have a significant impact upon what should be ambitious VMT reduction goals.	
110	Chesapeake Bay Foundation	As COG has shown in its own analyses, reducing VMT is an essential element in any overall GHG emission reduction strategy for our region. ...increasing investment in effective and efficient transit relative to other modes. Preserving and maintaining transit capacity – and building much more of it – is vital to our future as a region.	CCSC agrees with the observation and recommendation. There are many actions being taken in the areas of concern that are noted. The report does include recommendations for enhancements to transit capacity. No changes made to report.
111	TPB	The TPB therefore does not support pursuing a regional conformity process for greenhouse gas emissions at this time, but is open to further discussion and examination of the issue as more information becomes available about the applicability of Clean Air Act provisions for GHG regulation.	CCSC understands the concerns and constraints expressed in the comment. Such considerations will be an important part of the future planning process. No changes made to report.
112	BOT	We recommend to defer consideration of a conformity type analysis for GHG emissions in the draft report until further federal guidance and technical study is completed.	CCSC understands the concerns and constraints expressed in the comment. Such considerations will be an important part of the future planning process. No changes made to report.
113	Fairfax County DOT	Do not support regional conformity process for GHG. Recommend developing an approach for modeling and reducing GHG emissions generated by all sectors in conjunction with TPB and MWAQC	
114	NVTA	The global nature of the problem also makes it apparent that adoption of regional conformity standards is neither warranted nor appropriate.	CCSC understands the concerns expressed in the comment. Such considerations will be an important part of the future planning process. No changes made to report.
115	TPB	The TPB plans to support future work of the Climate Change Steering Committee through ongoing analysis of the transportation strategies in the TPB's "What Would It Take?" Scenario Study. This scenario will examine the different scale and combinations of transportation strategies that would be needed to meet the GHG goals outlined in the draft Climate Change Report.	CCSC looks forward to the results of the scenario analysis. No changes made to the report.
116	Sierra Club	Sierra Club Comment #6: Sierra Club recommends that the TPB Scenario modeling be accelerated and promoted to explore the cost-effectiveness of various strategies to reduce CO2 from this sector; as that the COG Board encourage area planning directors and elected leaders to become more active participants.	Staff supporting TPB have already begun to analyze cost effective measures in the sector. Such work will be important to consider during the next phase of the planning process. No changes made to report.

Comment Number	Commenter (see attached list of commenters with acronyms)	Comment	Response
117	Sierra Club	Sierra Club Comment #7: Sierra Club recommends that the Scenario Studies now in development by the TPB should become the foundation for debating and prioritizing projects to include in a regional multi-modal transportation and transit network plan – a Financially Unconstrained Long Range Plan.	CCSC appreciates the recommendation and will communicate the suggestion to TPB staff working on the Scenarios Study. No changes made to report.
118	BOT	As TOD is one of the key land use opportunities to help reduce vehicle miles traveled, the COG report should advocate for implementation of the Joint Development Task Force recommendations. The report might also advocate for undertaking a regional TOD plan to demonstrate the existing and potential capacities and beneficial impacts of TOD at Metro and commuter rail stations, and at well served activity centers.	The report identifies TOD as the preferred growth strategy. During the next phase of the planning process, CCSC anticipates that such potential advocacy positions and analysis would be considered.
119	BOT	In considering implementation of a VMT reduction strategy, it is recommended that sufficient study be carried out to document the capacity of our region's transit system, carpool and vanpool lanes, and potential future land use patterns to ensure that this measure is achievable. Examples of additional study needed include the proposal for a federal four day workweek and the impact of telework in reducing VMT....Advances in technology and / or implementation in current clean vehicle regulations may obviate or reduce the need for planned target goals.... Finally, the timeframe for implementing or phasing in all or parts of a VMT reduction strategy should be clarified.	CCSC understands that the type of data and analysis suggested would be an integral part of any future transportation and climate change related planning activities. No changes made to report.
120	ASLA	As the reauthorization process for SAFETEA-LU begins, ASLA recommends that this plan include advocacy targets for transportation that are consistent with the MWCOG's climate change goals and strategies. Potential advocacy positions include implementing complete streets standards for federal projects, and increased funding for the Safe Routes to School and Transportation Enhancements programs.	CCSC appreciates the suggestions. Such positions may be considered during the next steps of the planning process. No changes made to the report.
121	NVTA	The Draft report calculates transportation sector emissions without taking recently approved CAFÉ standards into account. While acknowledging in	TPB staff are currently undertaking emissions analyses that include considerations of the impacts of CAFE standards among other

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		places that 2020 CAFÉ standards will reduce most carbon dioxide emission growth between now and 2030, the Draft still leaves the impression that transportation sector emissions will grow by 37% by 2030 when in fact with 2020 CAFÉ standards the increase is only 8%. Other technological changes are likely to reduce 2030 transportation emissions below current levels, again despite more vehicles, trips and VMT.	factors that impact emissions from the transportation sector. The report acknowledges the significant benefits of CAFE. We used a 2005 base year and business as usual projections reflected conditions at that time. Future updates to the emission inventory will account for actions taken since 2005.
122	AQPAC	The report states that the recent changes to the federal CAFE standards do not address fuel efficiency for heavy duty trucks. The report should be revised to reflect the fact that the recent federal Energy Bill (the Energy Independence and Security Act of 2007) includes requirements that DOT adopt fuel efficiency standards for heavy duty trucks.	The report will be changed to reflect the fact that the Energy Independence and Security Act of 2007 states that U.S. DOT must conduct a study on fuel efficiency standards for heavy duty trucks. The TPB What Would It Take Scenario, which is currently ongoing, will address this issue.
123	AQPAC	It may be useful to include a projection of benefits of CAFÉ should it continue to improve beyond 35 mpg beyond 2020. The current assumption is that improvement will continue as required to 2020 and then remain static thereafter. The new statute, however, requires that the bar be moved up to the "maximum feasible" level after model year 2020.	The report will be changed to reflect the fact that the Energy Independence and Security Act of 2007 requires that fuel efficiency standards be raised beyond 35 mpg to the "maximum feasible" level after model year 2020. The TPB What Would It Take Scenario, which is currently ongoing, will address this issue.
124	AQPAC	The report should use numbers from the TPB analysis of what level of gasoline mileage efficiency is needed to support the reduction goal. (TPB says its 168 mpg). This section also notes that the California LEV could further reduce emissions, which is an important point.	CCSC does not believe that mileage standards alone is the sole solution to the problem. A number of issues need to be considered such as carbon content of fuels and possible reductions in VMT. The TPB What Would It Take Scenario, which is currently ongoing, will address the potential of Cal LEV II.
125	Sierra Club	Sierra Club Comment #5: Sierra Club recommends that the Report also suggest advocacy for the (so-called) Pavley CO2-standard law. This law, adopted by 11 states and the District, would require automobile makers to reduce global warming emissions from new cars and light trucks beginning in 2009. The Pavely Law delivers clean car choices for consumers, and encourages cost-effective technology to reduce CO2.	The TPB What Would It Take Scenario, which is currently ongoing, will address the potential of Cal LEV II.
126	AQPAC, Fairfax Environmental Coordinator	Land use choices, especially those that locate people close to public transit, should reduce overall emissions. We suggest that efforts of different jurisdictions to support land use choices that will locate people closer to	Agreed. CCSC anticipates future planning efforts will include such considerations. <b>Report revised to include examples of successful TOD.</b>

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		transportation corridors should be highlighted. The report should include more highlights of successful transit oriented development (TOD), including Reston.	
127	AQPAC	The report should recognize that there will be a time lag in realizing the benefits of transit oriented development (TOD).	Agreed, report was revised to reflect comment.
128	Bull	The report recommendation that development be directed to activity centers/transit stations is based on a flawed paradigm. This approach doesn't address the possibility that continued population growth is not sustainable. The report should focus more on recommending actions to create a sustainable economy that does not depend on continued growth.	Transit-oriented development is a policy that has strong support throughout the region. CCSC does not believe that TOD and sustainable economic growth are incompatible. No changes made to report.
129	College Park	Walkable/Bikable Community Maps should be developed and made available to the public.	CCSC appreciates the suggestion and hopes such products could be produced in the near future. No changes made to the report.
130	Wright	The report recommends funding of bicycle paths. The report should also include recommendations for on-road bicycle accommodations and facilities. Include on-road bike routes that could take the form of bike lanes, wide curb lanes, or paved shoulders.	Agreed, report revised to reflect suggestion.
131	AQPAC	It is not clear whether the report is calling for more public or private teleworking.	Agreed, report revised to reflect suggestion.
132	Ambler, Fary	The report should recommend that highway funding be diverted to transit projects and projects to replant forests destroyed by highway construction. The report should include a recommendation that funding for the Inter County Connector (ICC) be halted.	The CCSC does not believe that the COG Board or CCSC should recommend halting the ICC at this time. No changes made to the report.
133	Fary	More transit options should be developed for the I-270 Corridor.	CCSC appreciates the suggestion and hopes such options will be considered. No changes made to the report.
134	Fary	More transit funding should be made available for the Purple Line.	CCSC appreciates the suggestion and hopes such options will be considered. No changes made to the report.
135	Gary Allen and Prince William County	A program should be developed to help local governments track tree canopy. ... Reliable and well-founded procedures to verify the status of regional tree cover is an essential component of any major COG Report that includes tree planting.	Agreed. COG facilitates a workgroup with local and state forestry officials devoted to developing a new plan for addressing tree planting and canopy in the region, in part to be responsive to a voluntary tree canopy initiative agreed to as part of the 8-hour ozone air quality plan (SIP). These efforts are expected to continue into the future. No changes made to the report.

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136	ASLA	<p>ASLA recommends that the plan go beyond the “no net loss” for the region’s tree canopy... the plan should seek to increase tree canopy in developed areas. ...</p> <p>Congress is currently considering legislation (HR 5867) to provide community incentives to implement similar programs. ASLA encourages the MWCOC to incorporate such proposals in their list of potential advocacy positions at the local, state, and federal levels.</p>	<p>COG facilitates a workgroup with local and state forestry officials devoted to developing a new plan for addressing tree planting and canopy in the region, in part to be responsive to a voluntary tree canopy initiative agreed to as part of the 8-hour ozone air quality plan (SIP). These efforts are expected to continue into the future. No changes made to the report.</p>
137	Fairfax Environmental Coordinator	<p>Page 58 states: “Establish a goal and develop a program and plan to achieve ‘no net loss’ in the region’s tree canopy... if this is the goal, has any time frame been suggested as to when the goal be attained? If benefits and costs of this target haven’t been evaluated (as is also suggested on page 58), do we know if no net loss is the optimal goal? Coordination with local government urban forest management staffs is suggested.</p>	<p>The language in the recommendation will be revised for clarity.</p>
138	Tregoning, Dobelbower	<p>P. 7. Projected Growth, 2nd paragraph. Question: Should there be a corollary study in the recommendations table that supports the issue of forest and grassland preservation/loss?</p>	<p>COG facilitates a workgroup with local and state forestry officials devoted to developing a new plan for addressing tree planting and canopy in the region, in part to be responsive to a voluntary tree canopy initiative agreed to as part of the 8-hour ozone air quality plan (SIP). These efforts are expected to continue into the future. No changes made to the report.</p>
139	Fairfax Environmental Coordinator	<p>Page 58 recommends that “a consistent, standardized methodology for evaluating the greenhouse gas emissions from proposed individual development projects” be developed in cooperation with COG’s Planning Directors Committee and local government environmental and energy planners. ...Would the individual project scale be the most appropriate approach for greenhouse gas emissions evaluations? In my view, there is a need to place any individual project into a larger regional context. How, for example, would the evaluation of greenhouse gas emissions associated with a high intensity transit-oriented development proposal in a revitalization area consider the broader regional benefits of the project (e.g., concentrating development near transit as opposed to having it occur in a lower density, automobile-oriented form)?</p>	<p>CCSC appreciates the suggestion and such considerations will be part of the next steps of the planning process. No changes made to the report.</p>

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140	Tregoning, Dobelbower	Our region has seen unexpected changes in behavior related to transportation and housing over the past 6 months, due in large part to the rapid increase in energy prices as well as declines in the housing market. In light of these changes, I would like to suggest that the potential impact on GHG emissions of smart growth and reduced VMT is greater than cited in the Climate Change Report. The report states that smart growth and reduced VMT can account for a 2–4% reduction in GHG emissions (page 34). I believe that the upper limit of this range should be increased to 10%.	CCSC understands that the recent increases in energy prices may have an impact on travel behavior. The suggested increase to the upper limit on VMT reduction impacts on greenhouse gas emissions should be further analyzed during the next phases of the planning process. The report currently does assume a 10% upper limit on the VMT reduction impact of smart growth, equating to a 2-4% reduction in total regional greenhouse gas emissions given the transportation sector's share of total emissions. No changes made to report.
141	Tregoning, Dobelbower	A recent study on regional foreclosures has found that: "between March 1, 2007 and February 29, 2008 there were 15,613 homes that went into foreclosure in the Washington DC metropolitan area. The Outer Suburbs have been hit hardest, particularly Prince William County"1. ...This new data calls into question the assumptions behind population forecasts included in the Climate Change Report. The report (states that) "population in the outer suburbs will experience the fastest growth rate" (page 50). If the current housing and transportation pricing trends continue, the expected growth in the outer suburbs is not likely to happen. Less growth on the edges will reduce commute trips (and therefore regional VMT) from outer jurisdictions.	CCSC appreciates the valuable references which should be considered during the next phase of the planning process. COG is also revising its cooperative forecasts and plans to issue Round 7.2 in the Spring of 2009 which may result in revisions to the current forecasts. No changes made to report.
142	Tregoning, Dobelbower	<p>Meaningful behavior change in response to price increases. High gas prices have motivated people to change their travel behavior, evidenced by historic increases in transit ridership and reductions in VMT (see Table 2).</p> <p>FHWA Traffic Volume Trends  Reduction in VMT July 2007 to July 2008  District of Columbia: -2.2%  Maryland: -3.4%  Virginia: -3.4%  <a href="http://www.fhwa.dot.gov/ohim/tvtw/08Jultvt/index.cfm">www.fhwa.dot.gov/ohim/tvtw/08Jultvt/index.cfm</a></p>	CCSC appreciates the valuable references which should be considered during the next phase of the planning process. No changes made to report.

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143	Tregoning, Dobelbower	Increasing facilities and programs to promote walking, bicycling and transit use. ...Other plans and programs, such as pedestrian and bicycle master plans, Safe Routes to School, the Street Smart Campaign, and commuter services, are being implemented in jurisdictions across the region to encourage transportation alternatives, increase awareness of the importance of daily physical activity, and to improve facilities and safety for pedestrians and bicyclists... Initial results from the FHA SAFETEA-LU Nonmotorized Transportation Pilot Program looking at similar initiatives across four US cities, are finding that increased facilities and programming can replace 0.25 to 0.75 miles of driving per day, per adult resident.	CCSC appreciates the valuable references which should be considered during the next phase of the planning process. No changes made to report.
144	Tregoning, Dobelbower	It is recommended that a note be added to the text when forecasts are presented stating that the underlying assumptions of these forecasts need to be revisited to better reflect the anticipated change in behavior of households in our region given a permanent and higher cost of energy.	CCSC appreciates the suggestion. <b>Text was revised to reflect comment.</b>
145	Tregoning, Dobelbower	Suggested language to add/replace the current language: The Climate Change Steering Committee should consult with other progressive regions around the country to broadly evaluate options for regional approaches to greenhouse gas reductions that include cap and trade, an allocated VMT budget (ala the recently signed into law California SB 375), and other approaches that might be relevant to our region or that might be under consideration in upcoming national Climate, Energy or Transportation legislation.	CCSC appreciates the suggestion. <b>Text was revised to reflect comment.</b>
146	Tregoning, Dobelbower	Note that any such approach that we evaluate should be careful not to disadvantage inner ring jurisdictions in the way conventional air quality conformity currently does, by establishing a regional baseline and assigning per capita reductions that ignore the wide differences in baseline generation rates. Cap and trade approaches that sub-allocate a carbon budget could be designed to avoid this problem.	This is an implementation issue that should be considered in the future. No changes made to report.
147	NVTA	Transportation – VMT Problematic Measurement Vehicle Miles of Travel (VMT) is an imperfect measure of carbon emissions and subject to misinterpretation and misrepresentation.... Alternative fuel	CCSC agrees that technological advancements could offer strong ways to reduce emissions. However, reducing vehicle use and the number of miles driven using carbon-intensive fuels also will serve to

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		<p>vehicles will produce fewer emissions meaning fewer greenhouse gases in the future, not more, despite major population, vehicle and VMT increases.</p> <p>Heavy reliance on VMT also fails to take congestion into account... the Steering Committee's report needs to acknowledge that failure to significantly improve the region's highway network, particularly outside the Beltway, is likely to increase congestion and greenhouse gas levels. Public transit and land use alone will not absorb demand.</p>	<p>reduce emissions. Whether failure to construct additional highways in the outer jurisdictions will cause increases in congestion and greenhouse gases is subject to debate. For example, it has been argued that road building actually induces further sprawl, and brings with it increased demand for carbon-intensive products such as electricity, heating fuels, and motor vehicle fuel. Highway construction equipment also emits greenhouse gases. No changes made to report.</p>
148	NVTA	<p>Calculating greenhouse gas emissions by transportation corridor serves no useful purpose. Carbon dioxide build-up is a global issue, not a transportation corridor problem. Corridor calculations fail to incorporate congestion factors and traffic diversion to other corridors when volumes reach high or failing levels.</p>	<p>CCSC believes that when government or the private sector build a new transportation facility, it is possible, at least in the short term, that the facility will be associated with increased emissions of greenhouse gases by increasing the capacity for travel and possible induced new development. While analysis of individual corridors may be less important to understand than the functioning and impact of the entire network, including transit and other multi-modal facilities, citizens and organizations in the region are interested in understanding the greenhouse gas emissions associated with particular corridors in their community. No changes made to report.</p>
149	NVTA	<p>Transportation – Mileage and Fuel Advancements Most Likely Offer Greatest Benefits</p> <p>The Steering Committee recommends reducing transportation emissions “by reducing Vehicle Miles of Travel, increasing fuel efficiency and reducing the carbon content of fuel.”</p> <p>However, for reasons just stated above and unless it can prove otherwise, the Committee Report should indicate that greater fuel efficiency and the development of alternative fuels are likely to achieve the highest reductions.</p>	<p>CCSC is appreciative of the work of the TPB staff in developing the suggested framework for addressing emissions from the transportation sector. Recommendations of experts indicate that each approach could be part of the solution. It would be speculative at this point for the committee to attempt to assert a preferred or most effective approach. In addition, different strategies may be required to meet short term vs. long term goals. No changes made to report.</p>
150	NVTA	<p>The region's climate change strategy should make clear that improving the capacity of our highway and transit networks is essential to maintaining travel speeds above 30 mph as well as overall regional mobility levels and prosperity.</p>	<p>CCSC appreciates the suggestion and believes such considerations could be part of the next steps of the planning process. No changes made to the report.</p>

Comment Number	Commenter (see attached list of commenters with acronyms)	Comment	Response
<b>Comments on Economic Development, Green Jobs</b>			
151	Sierra Club	Sierra Club Comment #8: Sierra Club recommends that the COG should draw on its economic development expertise to identify appropriate private sector actors--such as chambers of commerce, (local) trade associations, (local) labor unions, D.C. Business Improvement Districts, neighborhood business associations, and (local) professional associations, and convene a meeting under the auspices of the Climate Change Program to identify green job goals and criteria.	CCSC appreciates the suggestions. COG expects to convene a variety of meetings in the future to facilitate stakeholder and public input. <b>The report was revised to highlight other potential participants in the process.</b>
152	Sierra Club	Re: the establishment of a best practices data base on incentives to promote green businesses... While this may be a useful idea, there needs to be a better considered decision about who COG is trying to serve with its various initiatives. Even if one assumes that COG is serving its constituent governments, there needs to be better resolution about who in those governments is connecting with the COG Climate Action Program, and how.	Further development of green business and associated institutional coordination in the region is anticipated to occur during the next phase of the planning process. <b>Text in report revised for clarity.</b>
153	Sierra Club	Sierra Club Comment #9: Sierra Club recommends that the COG should provide access and analysis of already available resources for local governments to consider in exploring green purchasing and business development.	CCSC agrees that an important COG role will be to help facilitate transfer of information to key stakeholders in the region. Staff appreciate the suggested resources. No changes made to report.
154	Sierra Club	Sierra Club Comment #10: Sierra Club recommends that the COG work with area jurisdictions and national experts in this field (procurement) to identify best practices to promote local vendors and suppliers.	CCSC agrees. COG's Chief Procurement Officers committee is focusing on best practices in green procurement. <b>Text revised to reflect suggestion.</b>
155	Chesapeake Bay Foundation	"Green collar" and "green business" opportunities should be envisioned with a much wider field of view than merely improving local food production. There are numerous technical sectors to plumb and local high-tech advantages to exploit, from telecommunications, to energy efficiency and solar, wind, tidal, waste, and other energy research, to water harvesting technologies, to creating centers for transportation advances.	CCSC agrees. <b>Text revised to reflect suggestion.</b>

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<b>Local Government Actions</b>			
156	Mathwin	Local governments should develop policies to reduce mowing.	CCSC appreciates the suggestion and hopes such options will be considered during the next phase of the planning process. <b>The report was revised to include a recommendation for reduced mowing as part of the early action list.</b>
157	Mathwin	Local governments should develop policies to reduce use of fertilizers.	CCSC appreciates the suggestion and hopes such options will be considered during the next phase of the planning process. COG is currently engaged in a project with Scotts Fertilizer and NVRC to encourage less use of fertilizer in the spring. No changes made to the report.
<b>Addressing Barriers</b>			
158	Hendel	Home Owner Association (HOA) restrictions low-impact landscaping should be addressed.	CCSC appreciates the suggestion and hopes such considerations will be addressed during the next phase of the planning process. No changes made to the report.
159	College Park	Challenges faced by smaller jurisdictions in terms of financing mitigation and adaptation should be addressed.	CCSC appreciates the suggestion and hopes such considerations will be addressed during the next phase of the planning process. No changes made to the report.
160	MWAQC	COG should develop strong advocacy positions that solicit the support of the federal government in providing for the research, development, and market commercialization of technologies needed to reduce emissions, such as clean vehicles and alternative fuels.	<b>CCSC appreciates the suggestion. Report revised to reflect comment.</b>
161	Debra Jacobson	...strong cooperation with (and leadership from) state and local governments as well as other regional entities... is particularly important in developing and implementing aggressive programs to increase energy efficiency in buildings and to reduce peakload electric demand.	<b>CCSC appreciates the suggestion. Report revised to reflect comment.</b>

Comment Number	Commenter (see attached list of commenters with acronyms)	Comment	Response
162	Debra Jacobson	The accomplishment of regional goals also will be dependent on federal leadership in certain key areas, particularly in supporting research, development and deployment of critical new energy technologies, such as carbon capture and storage for coal-fired plants as well as improvements in transportation efficiency (e.g., mass transit funding, potential incentives to encourage and support the retooling of auto manufacturing plants, and the development of a plug-in hybrid infrastructure).	CCSC appreciates the suggestion. Report revised to reflect comment.
163	Debra Jacobson	RE bullet 1 – sub-bullet – Work with DOE’s Office of Energy Efficiency and RE to identify regulatory barriers to solar and wind energy (e.g., standby rates, interconnection) and work with state PUCs and energy offices to remove such barriers (e.g., see the discussion of cogeneration barriers and steps to overcome in the Sept. 19, 2008 ACEEE report above)	CCSC appreciates the suggestion. Report revised to reflect comment.
164	Debra Jacobson	RE – work with state air and climate agencies to assure that air pollution and climate change agencies place renewable energy generation on a level playing field with fossil fuel generation in emission trading programs (e.g., any allowances that are not auctioned should be allocated on an output basis).	CCSC appreciates the suggestion. This is a subject for future discussion.
165	Fairfax Utility Branch	The Report fails to acknowledge the existence of regulatory and institutional barriers that may impede the region’s progress towards these goals... As the regional climate change initiative moves forward, the recognition of these barriers, and suggestions for lowering or eliminating them, should be considered.	CCSC agrees. Report revised to reflect suggestion.
166	Fairfax Utility Branch	Virginia utilities operate within a regulatory framework that generally rewards them for selling more, not less, energy. ..The draft Report does not appear to recognize these demands on Virginia utilities and, consequently, may paint an unduly optimistic picture of utility support for and participation in conservation and energy efficiency efforts.	CCSC appreciates the comments and realizes the challenging of implementing new programs to increase energy efficiency and reduce overall energy usage. Report was revised to reflect the comment.
167	Fairfax Utility Branch	...utilities should be excluded from the development of regional energy conservation goals and timetables. Once those goals are set and adopted, however, it may be appropriate to include utilities in the development of implementation plans.	CCSC believes that participation of utilities does not necessarily hinder the process of establishing effective goals and plans. No changes made to report.

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168	Fairfax Utility Branch	Re increasing production of renewable energy, "A state's regulatory framework may limit those opportunities... Currently, in Virginia, only a public utility may transmit electricity or deliver natural gas to paying customers and/or cross the public right-of-way... regulatory restrictions may limit how or by whom that energy can be used.	CCSC appreciates the comment and is aware of the need to address these types of constraints. Such considerations will be an integral part of the next steps of the planning process. <b>Report revised to highlight the need to address such barriers.</b>
169	Fairfax Utility Branch	Recommendations: As the regional climate change initiative moves forward, the recognition of regulatory and institutional barriers, and suggestions for lowering or eliminating them, should be considered.	Agreed. No changes made to report.
<b>Comments on Public Outreach and Education</b>			
170	AQPAC	Public involvement and outreach will be important to the successful implementation of these actions and recommend that public involvement play a prominent role in the process.	CCSC appreciates the suggestion. CCSC anticipates additional efforts will be made during the next phases of the planning process to develop effective public education and outreach campaigns, including workshops. No changes made to report.
171	AQPAC	The report appears weak in the area of public education and outreach... We recommend workshops and public outreach will be important to gain public support.	CCSC appreciates the suggestion. CCSC anticipates additional efforts will be made during the next phases of the planning process to develop effective public education and outreach campaigns. No changes made to report.
172	Mathwin	COG should lobby school boards to teach the science of global warming.	CCSC appreciates the suggestion. CCSC anticipates additional efforts will be made during the next phases of the planning process to communicate with local school boards on the development of effective education campaigns. No changes made to report.
173	Chesapeake Bay Foundation	We would also make a recommendation concerning how COG communicates on these issues. "Energy conservation" sounds like "sacrifice." "Energy efficiency," on the other hand, is really what is at stake. Indeed, the gains that can be made from increasing energy efficiency in all sectors of endeavor (versus merely conservation) are nothing less than stunning – while these have already been achieved in some other states (e.g. California currently uses half our energy per capita) and countries (e.g. Germany), our region and the US in general are far behind.	Agreed. <b>Text was added to the report to reflect the relative success in other locations that is illustrative of the potential for improvement in this region.</b>

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174	NVRC	Please incorporate a specific reference to the work between NVRC, MWCOG and its counterparts in Europe (specifically the European Network of Metropolitan Regions and Areas) in the harvesting of best practices. ... The application of the EU-developed Regional Greenhouse Regional Inventory Program (GRIP) can be applied to strengthen this region's inventorying efforts.	CCSC appreciates the suggestion. CCSC anticipates that there will be continuing opportunities to pursue programs to transfer technology and policy from other regions of the world and for the National Capital Region to become a leader in this regard. <b>The report was revised to note that COG is currently collaborating with NVRC and our European counterparts (METREX).</b>
175	Arlington Board Chairman Walter Tejada	As part of the regional outreach and education program, it is important to reach minority and other communities to insure an inclusive and effective effort going forward... I propose the region host a Latino forum in the spring at the COG offices that would be televised by the Latino media for insuring the success of the region's climate change initiative.	CCSC appreciates the suggestion and looks forward to working with Mr. Tejada to convene this program. <b>Recommendation added to report.</b>
176	Dockendorf	...information on climate change needs to be pared down and communicated to the public in laymen's terms. ... Highlight popular community/business leaders engaged in desired behaviors. People will often decide what attitudes and actions are appropriate from observing leaders and those they look up to.	CCSC appreciates the suggestions. No changes made to the report.
177	NVTA	Re: Public Education and Outreach ...To be effective, such efforts must be factual and credible...Emphasis must be on measures that are most effective from a carbon dioxide reduction and cost standpoint.	CCSC appreciates the suggestions. No changes made to the report.
<b>Comments on Impacts and Adaptation</b>			
178	Alexandria	The report should more thoroughly address the potential impacts of sea level rise on communities that are at greater risk of flooding if sea level rises as projected in its report.	CCSC appreciates the comment. Such analysis should be conducted during the next phase of the planning process. No changes made to report.
179	Alexandria	Alexandria recommends COG and CCSC consider as a "Moving Forward" item the development of a regional Climate Change Adaptation Plan to assist localities with the development of vulnerability assessments, adaptation planning, and emergency preparedness.	CCSC appreciates the comment. <b>A recommendation for development of a climate adaptation plan including an adaptation assessment was added to the report.</b>

Comment Number	Commenter (see attached list of commenters with acronyms)	Comment	Response
180	Fairfax Environmental Coordinator	Page 27 indicates that Table 2 identifies various levels of weather-related risk for different counties in the Washington DC area and adjoining region. In reality, this table focuses only on counties in Maryland; the lead-in text should be clarified. Table 2 is interesting in that it suggests that there are differences within the region regarding potential weather-related effects of climate change, even differing between adjacent counties. It is not clear why there would be such differences, and Table 2 perhaps raises more questions than it answers.	The table was taken from a Maryland Climate Change Impacts report and therefore only focuses on Maryland jurisdictions. No changes made to report.
181	ASLA	ASLA believes that the draft report's outline of the impacts of climate change is a vital component of this effort and recommends that greater emphasis be placed on innovative stormwater management techniques and low-impact development to avoid excessive stormwater runoff. ..The Sustainable Sites Initiative promises to be a dynamic tool that will expand the capacity to quantify the benefits of a site toward greenbuilding targets. ASLA is available to lend its expertise in any way that can serve this effort.	CCSC appreciates the comment. Such recommendations will hopefully be considered during the next phase of the planning process. No changes made to report.
182	Sierra Club	Sierra Club Comment #11: Sierra Club recommends that COG explicitly pierce the charade that our society can be profligate in its use of resources, generation of waste, and consumption of energy without an environmental reckoning. Our urban form must be designed to use energy efficiently and reduce the need for single occupancy vehicles to meet mobility needs.	CCSC appreciates the comment. Such strategic goals will hopefully be articulated and acted upon during the next phase of the planning process. CCSC desires to see increase efficiency and reduced reliance on single occupancy vehicles. No changes made to report.
183	Sierra Club	Identify a variety of university researchers already working on climate change issues, then use grants or contracts to enlist their work on locally specific topics. If collaboration with one university is a good idea, why not foster as many as possible? See recommendations for Section 12.	CCSC agrees that there is a wide array of resources in the region. <b>The recommendation was modified to reflect this suggestion.</b>
184	Sierra Club	(The CCSC should) ...make recommendations for re-zoning low-lying areas that are most vulnerable to rising water levels.	CCSC is not in a position at this time to make such a recommendation. Further consideration of this important potential impact, as well as appropriate responses, is needed.
185	Sierra Club	The COG also needs to make a more specific recommendation as to how the Washington Metropolitan Area Transit Authority is going to safeguard underground infrastructure from rising water levels (and pay for it).	Agreed. This type of recommendation should be considered as part of the proposed adaptation analysis and plan.

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186	Sierra Club	The COG should also work with national and local insurance companies to forge a plan for making sure that the regional community is adequately insured for the property damage and liability damage that might result from climate change.	Agreed. The report recommendations were revised to reflect this suggestion.
187	Chesapeake Bay Policy Committee	Work with the region's stormwater management programs, other regional organizations, and WW/DW plants to quantify the potential impacts of these precipitation changes and to identify what mitigation or adaptation actions might be needed. COG should host regional workshops on this topic.	This is a good suggestion for future work. One of the planned workshops identified in the report recommendations will include this topic.
<b>Comments on Advocacy</b>			
188	Fairfax Environmental Coordinator	Restore federal tax subsidies for renewable energy production.	CCSC appreciates the suggestion. Report was revised to reflect the comment.
189	Fairfax Environmental Coordinator	Federal actions are needed to support new markets: battery technology, cost of solar energy technology, clean vehicles.	CCSC appreciates the suggestion. Report was revised to reflect the comment.
190	Chesapeake Bay Policy Committee	The CBPC will solicit input from the WRTC and respond to proposed legislation and/or regulatory initiatives (affecting the regions' stormwater management programs); as appropriate, it will provide comments or recommendations to the COG Board regarding such initiatives.	CCSC appreciates CBPC's assistance in identifying state or national legislation that would negatively impact the energy efficiency or effectiveness of local programs.
<b>Technical Edits/Corrections</b>			
191	Debra Jacobson	P. 3 – the cost-benefit issues associated with climate change are contentious. The paragraph on this page oversimplifies these complex issues and should be revised.	Report revised in response to comment.
192	Debra Jacobson	P. 6 – suggest a clarification of the transition between the discussion of air temperature and the discussion of water temperature.	Report revised in response to comment.
193	Debra Jacobson	P. 7 – par. 4 – sentence 1 - recommend a revision of the language to state "do not account for Federal energy legislation enacted in December 2007 that substantially strengthens fuel efficiency standards and efficiency standards for consumer products."	Report revised in response to comment.

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194	Debra Jacobson	P. 7 – last two sentences – overstatement of text on p. 30 – should refine	Report revised in response to comment.
195	Debra Jacobson	p. 45 – Energy Conservation and Efficiency – third bullet – don't limit to weatherization	Report revised in response to comment.
196	Debra Jacobson	p. 45 2nd bullet – should specify goal of at least X% - now have new VA report (above) by ACEEE to assist in goal-setting.	Report revised in response to comment.
197	Debra Jacobson	P. 8/P. 31 – Strategy to Modify Energy Consuming Behavior – last sentence – the wording “relatively easy to achieve” should be modified since significant challenges must be overcome to reach this goal.	Report revised in response to comment.
198	Debra Jacobson	p. 39 – 2nd par. – revise as follows: “Some possible longer-term solutions, such as carbon sequestration and increased nuclear generation are not yet commercially available or face significant hurdles to implementation.” (Solar and stationary fuel cells should not be lumped into this sentence)	Report revised in response to comment.
199	Debra Jacobson	p. 46 – remove small-scale	Report revised in response to comment.
200	Kinsman	on page 8, in the section on “Strategy to Modify Energy-Consuming Behaviors”, the last sentence includes a value judgment that should be recrafted. Further, any other value judgments like this in the report should be reconsidered.	Report revised in response to comment.
201	AQPAC	The graph on p. 17 is illegible and should take up a whole page or otherwise made understandable	Report revised in response to comment.
202	AQPAC	The figure on p. 21 needs labeling to make it readable.	Report revised in response to comment.
203	AQPAC	On p. 68, another group deserves mention: NRDC (Natural Resources Defense Council).	Report revised in response to comment.
204	AQPAC	On p. 76, the text should be updated since it states that the financial picture will become clearer by the summer and we are now in the fall.	Report revised in response to comment.
205	Buffone	Here are a couple more things that Montgomery County is doing that I did not see referenced in your report: The County provides property tax credits for residential geothermal heat pumps, energy-conservation devices, and solar water heating and solar photovoltaic devices; The County is planning two projects that will convert landfill gas into 3.2 MW of clean energy; The	CCSC appreciates the important programs being developed in Montgomery County. This information can be added to the "Best Practices" report when it is revised. No changes made to report.

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		local school system entered into a contract for 1.4 MW of on-site photovoltaic solar energy; New commercial and multi-family construction over 10,000 square feet must meet the equivalent of LEED-certified rating, while County funded buildings must achieve LEED Silver or its equivalent. Starting in 2010, new single family homes must meet ENERGY STAR or equivalent standards	
206	Dwyer	On page 48, the text "a consortia" should read either "a consortium" if it is intended to be singular or just "consortia" if it is intended to be plural. (I believe the singular is more appropriate in this context.) In general, the other grammatical errors in the report should be fixed before the final report is released. This will increase the credibility of the report and its authors.	Report revised in response to comment.
207	Dwyer	On page 52, should the text "every 10 of employees" actually read "every 10% of employees"? I haven't done the math, but the statement sounds unlikely as currently written.	Report revised in response to comment.
208	Fairfax Environmental Coordinator	Reconcile statements about the maximum surface temperature acceptable and those that would bring dire consequences. (pp. 19, 21, 30) The report should give some reconciliation between this assertion and the emissions goals being set based on a higher allowable temperature rise.	Report revised in response to comment.
209	Fairfax Environmental Coordinator	The third sentence of the third paragraph on p. 9 says that, "Reduced energy use provides significant regional benefits, such as enhanced quality of life . . . ." ...Maybe replace "Reduced" with "Efficient"	Report revised in response to comment.
210	Fairfax Environmental Coordinator	The cited reduction goals and the requirements of the IPCC report do not seem to correspond. They do not all give the base date upon which various "percent reduction" goals are based, and where they do, they do not all state what the emissions were in that base year, so it is difficult to tell if the goals and requirements are consistent. (See, , Table 3 on p. 30)	Report revised in response to comment.
211	Fairfax Environmental Coordinator	Table 4 on pp. 32-33 gives a wealth of individual actions for reaching the 2012 goal that are easy and even superficial. It is encouraging that such low-hanging fruit may be enough for the first phase of the plan. These are the only actions suggested for reaching that goal, but no indication is given of how widespread the adoption of the measures would need to be, nor to	Report revised in response to comment.

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		what depth in the list each household would need to go for the region to make the 2012 goal using only these measures. This information would be helpful to understand what level of effort will be required to carry out this strategy.	
212	Fairfax Environmental Coordinator	Table 5, fig. 11, and the discussion on p. 34 seem not to acknowledge the probable reality that the percent reductions possible from the listed measures are not cumulative. They are probably based on percent of current GHG emissions. If that is true, each successful measure would reduce the effectiveness of all the others, and the overall benefit will be somewhat less than the projected 55-57 percent of necessary reductions.	Report revised in response to comment.
213	Fairfax Environmental Coordinator	The list of “clean (alternative) energy sources” in the last paragraph on p. 39 has a glaring omission: wind energy. Since the paragraph appears to be relating the contents of the COG Strategic Energy Plan rather than offering original ideas, the omission may mean wind is not addressed in that document.	Report revised in response to comment.
214	Tregoning, Dobelbower	<p>The following are recommended text changes to specific sections in the report.</p> <p>P. 9. Taking Action, Mitigating Emissions (2nd sentence). Add: large network of environmentally focused nonprofits, a growing consortium of climate focused universities and colleges.</p> <p>P. 10. Outreach and Education. Add: Efforts should be made to bridge the divide between research, technological innovation and industry practice.</p>	Report revised in response to comment.