

Comments on the COG Climate Change Report

Presentation to CCSC
October 22, 2008



Overview

- Report Review and Outreach
- Comments Received
- Commenters
- Comment Categories
- Report Revisions
- Policy Discussion
- Next Steps and Schedule



Report Review and Outreach

- COG Climate Change Report Public Review Process
 - July 9 through September 30
 - Report posted on COG website
 - Comments received through website, email, mail, and during regional briefings.
- Regional Briefings
 - COG Staff Presented to Nearly all Member Jurisdictions



Comments Received

- Staff Received and Reviewed Comments
- Matrix of Comments and Proposed Responses by Category
 - 33 Commenters: Government, Non-profits, Businesses, Individuals
 - 214 Comments Overall
 - 11 Comment Categories
- All Comments Posted on COG Website
<https://www.mwcog.org/environment/climate/public/comments.asp>



Commenters

- Government (11)
 - TPB, MWAQC, AQPAC, Chesapeake Bay and Water Resources Policy Committee, Fairfax Board, Fairfax Environmental Coordinator, Fairfax Dept of Transportation, Fairfax Utility Branch, District of Columbia Office of Planning, City of Alexandria, City of College Park
- Non-Profit Organizations (8)
 - Sierra Club, Chesapeake Bay Foundation, Center for Chesapeake Communities, Greater Washington Board of Trade (BOT), Northern Virginia Transportation Alliance (NVTA), Northern Virginia Regional Commission (NVRC), American Society of Landscape Architects (ASLA), Fairfax Advocates for Better Bicycling (FABB)
- Companies (1)
 - Eco-cycle
- Individuals (15)



Overview of Comment Categories

- Greenhouse Gases and Climate Change
- COG's Climate Change Program
- Reduction Targets
- Mitigation Measures
- Energy Recommendations
- Transportation and Land Use Recommendations
- Economic Development, Green Jobs, Outreach and Education
- Impacts and Adaptation
- Other
 - Addressing Barriers
 - Advocacy
 - Local Government Action



Report Revisions

- Proposed report revisions highlighted in comment matrix
- Report recommendations table reorganized for clarity
- Policy discussion/decisions needed
 - Comments received
 - New recommendations



Policy Discussion

Existing Recommendations:

1. Regional greenhouse gas reduction targets.
2. Energy reduction target for local governments.
3. Conformity Process for greenhouse gas emissions.
4. Whether emissions inventory baseline should be revised to reflect CAFÉ (vehicle mileage) standards or other measures.
5. Tree Canopy: Goal of “no net loss” or set a percentage goal.
6. Recommendation to require greenhouse gas emissions analysis for individual projects.

Proposed recommendations to be added:

7. Urge Public Utility Commissions to focus on energy efficiency, demand reduction and renewable energy. Implement policies to remove the disincentive for utilities to invest in energy conservation.



1. Regional Greenhouse Gas Reduction Targets

Draft Report:

- 10% off BAU by 2012
- 20% below 2005 levels by 2020
- 80% below 2005 levels by 2050

Comments:

- Reduction Targets Not Aggressive Enough
- Reduction Targets Need to Be Reevaluated on a Periodic Basis
- Base Year and Reduction Targets Across Region Need to be Consistent

Proposed Response

- Maintain existing targets
- Add language about periodic update every 5 years
- Await Virginia report and decide later about base year and reduction target consistency



2. Energy Reduction Target for Local Governments

Draft Report:

- 15% Reduction by 2012

Comment:

- Add also 30% by 2020

Proposed Response:

- A new goal for 2020 could be developed after assessing the energy impacts of the current report recommendations. No new report recommendation at this time.



3. Conformity Process for Greenhouse Gas Emissions

Draft Report:

- “Collaborate with TPB to evaluate how a regional process modeled after the current regional conformity process for air quality planning might be adapted to address greenhouse gas emissions.”

Comments (several):

- Do not support conformity process at this time.

Proposed Response:

- The draft report recommendation is intended as a voluntary action to limit regional greenhouse gas emissions. No changes to report, consider issue during next phase of planning process.



4. Whether Emissions Inventory Baseline Should Be Revised to Reflect CAFÉ (vehicle mileage) Standards or Other Measures

Draft Report:

- Neither federal CAFÉ or appliance efficiency standards are factored into the BAU projections.

Comment:

- Recent federal measures are expected to reduce future emissions and should therefore be reflected in the BAU projections.

Proposed Response:

- The BAU projection reflects conditions in 2005. Future emission inventories will be revised to reflect measures implemented since 2005.



5. Tree Canopy: Goal of “no net loss” or Set a Percentage Goal

Draft Report:

- “Establish a goal and develop a program and plan to achieve “no net loss” in the region’s tree canopy.”

Comments:

- Why establish a goal if the report recommendation is for no net loss?
- A goal of a percent improvement in tree canopy should be adopted.

Proposed Response:

- There is a COG workgroup underway that is developing a regional program to address tree canopy, in response to commitments made in the 8-hour ozone SIP.
- Revise report to clarify goal and recommendation.



6. Recommendation to Require Greenhouse Gas Emissions Analysis for Individual Projects

Draft Report:

- “In cooperation with COG’s Planning Directors Committee and local government environmental and energy planners, convene a working group to devise a consistent, standardized methodology for evaluating the greenhouse gas emissions from proposed individual development projects.”
- “Quantify projected greenhouse gas emissions from major new transportation and other new capital projects.”

Comments:

- Evaluating greenhouse gas emissions for a transportation corridor serves no useful purpose. Climate change is a global issue.
- Need to consider impacts of projects in larger regional context.

Proposed Response:

- The draft report recommendation is intended as a voluntary assessment of individual project emissions to evaluate alternative designs that might yield greenhouse gas emission reduction benefits. No change to report. Issue can be addressed in next phase of the planning process.



7. Remove Barriers to Utility Investment in Energy Efficiency and Conservation

Draft Report:

- No such recommendation made.

Comment:

- It is important to remove barriers and disincentives that hinder utility investment in energy efficiency and demand management.

Proposed recommendations to be added:

- Urge Public Utility Commissions to focus on energy efficiency, demand reduction and renewable energy. Implement policies to remove the disincentive for utilities to invest in energy conservation.



Next Steps and Schedule

- Review and Approve Changes
 - CCSC Meeting on October 22
- Schedule for Board Adoption
 - November 12
- CCSC Policy Workgroup
 - Meet to develop recommendation for legislative session.
- Other Program Development Activities
 - Underway: Analysis of measures, What Will It Take Scenario, Tree Canopy Workgroup, Energy Efficiency and Renewable Energy Protocol Recommendations, IGBG, Green Airports Initiative, and others

