

## **Comment 1 for Comments on Local Government Toolkit. (localgov-toolkit-ws) - 1st Workshop.**

First Name: David  
Last Name: Somers  
Email Address: david.somers@lacity.org  
Affiliation: City of LA, Department of City Planning

Subject: ARB Tools to give local governments - Quantify TDM Mitigation Measures  
Comment:

I would like to submit a suggestion/answer to question of are there other tools ARB can develop to assist local governments to reduce GHG emissions?

Local governments in their role as Lead Agencies can provide mitigation measures on projects subject to CEQA. Though a current barrier to incorporating meaningful GHG reducing mitigation measures is lack of quantified threshold, and secondly lack of quantified reductions of mitigation measures (MM) that could directly reduce GHG reductions on a project level. CARB could help local governments in researching and developing the methodology to develop a centralized GHG mitigation toolbox with each MM quantified as their GHG reductions. Similar work is being conducted by SCAQMD in their drafting of rule 2301.

Special potential could be developed for MMs that have co-benefits in trip reductions. Most transportation agencies are way behind the curve in quantifying trip reduction benefits of transportation demand management (TDM) measures, as well as transit and pedestrian strategies. So Cities still are over reliant on supply side physical improvements (ie lane widening) as the primary means to mitigate traffic, which increase GHG over the long term by creating car dominated land uses. This is because they at least are quantified and a industry approved methodology. TDM does both, reduces trips and GHGs. Once a standard approach is available for TDM reductions then local governments can draft policies that explicitly prioritize TDM as a MM for traffic, and local governments all over the state will have little excuse for mitigating LOS by lane widening, rather than TDMs. I have attached generalized mitigation language than can be seen as a starting point. Other reference documents as follows:

Los Angeles Metropolitan Transportation Authority, 2002  
Congestion Management Plan, Appendix F - toolbox of Strategies;

CALTRANS, July 2007 "Local Models and Tools for Analyzing Smart-Growth Strategies";

NelsonNygaard Consulting Associates, August 2005 "Crediting Low-Traffic Developments Adjusting Site-Level Vehicle Trip Generation Using URBEMIS";

SCAQMD, PR Rule 2301: List of Transportation Emission Reduction Measures To be included in the PR2301 Guidance Document WORKING DRAFT

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/localgov-toolkit-ws/1-tdm\\_package.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/localgov-toolkit-ws/1-tdm_package.pdf)

Original File Name: TDM Package.pdf

Date and Time Comment Was Submitted: 2009-03-09 10:54:47

No Duplicates.

## **Comment 2 for Comments on Local Government Toolkit. (localgov-toolkit-ws) - 1st Workshop.**

First Name: Wes  
Last Name: Wood  
Email Address: wwood@derceto.com  
Affiliation: Derceto, Inc

Subject: Water Utility Energy Management Case Studies  
Comment:

Enjoyed your workshop today. Would like more info regarding joining the Advisory Board and to submit the attached case studies for your consideration of relevant municipal water utility energy efficiency projects. Thanks very much.

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Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/localgov-toolkit-ws/2-derceto\\_ca\\_arb\\_09032009.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/localgov-toolkit-ws/2-derceto_ca_arb_09032009.pdf)

Original File Name: Derceto\_CA\_ARB\_09032009.pdf

Date and Time Comment Was Submitted: 2009-03-09 11:05:55

No Duplicates.

## **Comment 3 for Comments on Local Government Toolkit. (localgov-toolkit-ws) - 1st Workshop.**

First Name: Antero  
Last Name: Rivasplata  
Email Address: trivasplata@jsanet.com  
Affiliation:

Subject: General and Specific Comments  
Comment:

The Local Government Toolkit will be a good resource for local governments. As it states, a one-stop source of information is important to preparing a climate action plan and establishing local programs and regulations to reduce greenhouse gas emissions.

However, I believe that there are some general and specific things that would make this even better. In general, the focus of this toolkit should be on tools that local governments can use to reduce emissions from both public and private sector emitters. This should include an equivalent to the "Local Gov't Operations Protocol," but designed for the purpose of estimating emissions from non-governmental/private sector sources.

More specifically under "Financial Resources," the discussion of Energy Efficiency Financing should include AB 811 of 2008 that authorizes cities to establish assessment areas for the financing of privately owned distributed generation renewable energy sources and permanent energy efficiency improvements. Participants receive financing from the city that they pay back through assessments over time. This new statute has the potential to be a major incentive for homeowners and others to install solar panels and increase the energy efficiency of their buildings.

Under "Climate Action Planning," the discussion of conducting the baseline inventory should specify that it is intended to include municipal, public, and private emissions sources. As written, it focuses on municipal and public sources.

The "Case Studies" section should highlight successful municipal programs or regulations that are encouraging the private sector to reduce their greenhouse gas emissions. Currently, the case studies are too focused on what cities do to reduce their own level of emissions. While that's a good thing, the toolkit needs to be much broader in its scope and application.

I will continue to review the Local Government Toolkit and may have additional comments and suggestions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-03-20 11:59:22

No Duplicates.

**Comment 4 for Comments on Local Government Toolkit. (localgov-toolkit-ws) - 1st Workshop.**

First Name: Malcolm  
Last Name: Gaffney  
Email Address: malgaff@gmail.com  
Affiliation:

Subject: calgov-toolkit-ws  
Comment:

Please pass this piece of legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-04-03 12:49:27

No Duplicates.

## **Comment 5 for Comments on Local Government Toolkit. (localgov-toolkit-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Fotu

Email Address: rebecca.fotu@morganhill.ca.gov

Affiliation: City of Morgan Hill

Subject: Additional Case Study from Morgan Hill

Comment:

The City of Morgan Hill has also implemented the "Lose 5,000 Pounds of Carbon in 30 Days" program since the fall of 2008. We have a total reduction of 258,000 pounds and growing. We also offer additional carbon reduction tools, such as a shower timer and a free home energy audit to participants.

Our community goal is to enroll 4,400 households by 2012 in the 30 day program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-04-13 10:08:56

No Duplicates.

**There are no comments posted to Comments on Local Government Toolkit. (localgov-toolkit-ws) that were presented during the Workshop at this time.**