

**Comments Received on Draft 2009-2012 Workplan
October 22, 2009**

Number	Comment	Commenter
	Local Government Implementation	
1	The work plan should reflect realistic assumptions regarding existing staff resources. There were many comments are about realistic expectations and the ability to achieve some of the items listed.	IGBG/EAC
2	Local government may not have authority to require certain recommended private actions.	IGBG/EAC
3	Concerns expressed: resources to carry out tasks, inability to meet target by exact date, increase in administrative burden, need to show tangible benefits, don't put citizens or businesses at competitive disadvantage, inability to directly control private behavior.	Manassas
4	Needs time to consider implications. Increase in administration and reporting. Change priorities and staffing. Economic development and utilities department impact. Financing uncertainties. Unstable. Need to define better what it means.	Jonathan Way CEEPC
	Building Energy Efficiency	
5	Be more specific on energy in buildings, not just LEED requirements.	IGBG/EAC
6	Should go beyond LEED Silver. Level beyond LEED Platinum, see Cascadia, Living Building Challenge, 100% energy efficiency, 100% water efficiency, over time.	Mark Starik CEEPC
7	Recommend making the LEED policy for new buildings and major renovations, and that all of these buildings receive a certain amount of points for energy efficiency (or stipulate a minimum energy performance). For federal buildings, we require 30% beyond ASHRAE 90.1-2004 standards.	Matt Gray CEEPC
8	LEED evaluates the building performance in green design categories and will determine if it is a "green building", but to comply with LEED does not guarantee an energy efficient building. I would encourage the workplan to include the EPA's Energy Star rating system in some capacity.	Travis Cutler (Dominion)
9	Most jurisdictions have policies but may not be doing the COG LEED Plus.	IGBG/EAC

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10	The term “required” in 1.a) is difficult in Virginia when applied to private sector development. Check to see what original report says for greening private sector buildings.	IGBG/EAC
11	Support greening the codes in addition to the IGBG report. Could COG members adopt the 30% improvement for residential and commercial sectors. Adopting strong enforcement policies and funding as new codes are adopted is critical. Virginia jurisdictions don’t have the same authority as jurisdictions in Maryland and DC – Virginians can adopt code that is approved, but can’t do more. Jurisdictions should enforce energy codes in existing buildings – but we aren’t enforcing very much. By 2012 – need to work on existing buildings and transportation. Codes won’t impact the short term.	IGBG/EAC
12	Set energy performance goals and rating and disclosure for government buildings. Local governments should establish energy targets for public buildings.	IGBG/EAC
13	Determination of building energy efficiency should be standardized and should include consideration of full life cycle.	Washington Gas
14	Promote an average score of 75 Energy Star for all buildings. Put this in 2 b. Many public buildings can’t be benchmarked, because they aren’t included in Energy star. Energy Star is good for benchmarking offices, schools, courthouses, etc. In many cases, the CBECS database can be used to benchmark building not included in Energy Star.	IGBG/EAC
15	How to track 10,000 homes retrofitted? Can we measure total regional energy use? Can track HPwES program instead of all retrofits. In Virginia, permits are not required for window installation, etc. so this could be very difficult to track. There was general consensus that 10,000 homes are too many. If you include weatherization, we might be able to achieve 10,000 by 2012? Count only government programs (HPwES, utility sponsored programs, etc). Members will report back on the number of homes they are predicting will participate in weatherization, HPwES, etc. to better estimate the goals. Can we track the number of windows sold, caulk sold, etc.? This is difficult. How many HPwES projects are each of the utilities budgeted for?	IGBG/EAC
16	Section 1b – there is concern that IGBG does not have the resources to complete reports on greening schools and residential construction. It is recommended that these be	IGBG/EAC

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	removed from the list.	
17	5-10% energy savings estimate for residential and commercial improvements could increase over time.	Mark Starik CEEPC
18	Section 4 should read “Develop policies, programs and incentives for retrofitting existing buildings, commercial and residential	IGBG/EAC
19	Reorganize Section II.A.4 to reflect that some items refer to all buildings, some refer to residential, and some refer to commercial buildings 4a-f all residential 4b – does this refer to only residential or commercial as well? 4g – I commercial	IGBG/EAC
20	4b – change to regional cooperation not “all three states”	IGBG/EAC
21	Add 4h – establish regional cooperation to train and certify commercial building operators, and facility managers. There should be regional cooperation on the management of commercial buildings, training for energy managers, contractors, etc.	IGBG/EAC
22	4g -- benchmark and disclosure	IGBG/EAC
23	Building operations and management needs to be addressed. Need a goal. Promote and implement. Receive building management training. Use LEED-EB for existing buildings. Retrocommissioning.	IGBG/EAC
	Green Power	
24	Establish a goal of 10000 solar roofs by 2012.	Preston Bryant
25	For green power purchases, certification of green power products for regional standardization. (This should be added as a strategy.)	IGBG/EAC
26	Promote Natural Gas, including level the playing field, subsidies for outreach, lifecycle analysis for fuels. Integrate energy efficiency with clean/renewable energy options. Promote combined/heat power and distributed generation installations. Convert electric hot water heaters to use natural gas.	Washington Gas

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	Transportation and Land Use	
27	Integrate TPB Work Program, recognize core role of TPB's Scenario Study Task Force. Address issue that several recommendations are already being implemented, e.g., commuter connections and best practices for traffic engineering.	VDOT, DTP Staff
28	Focus on measures that provide systemic impacts on reducing emissions and that are cost effective.	VDOT
29	Goal should be revised to reduce VMT growth, not absolute VMT.	VDOT
30	Although it is not explicitly mentioned in the Workplan, it is assumed that some of COG's member jurisdictions will choose to implement smart growth techniques such as transit-oriented and mixed-use development as measures to reduce greenhouse gas (GHG) emissions and urban sprawl. Such measures will promote high-density growth in those jurisdictions, which in turn, will make it more challenging for them to meet their GHG emission reduction goals. The City asks that COG consider this issue during the performance measurement process.	Erica Bannerman
	% and Target Dates for Completion	
31	All % adopting should be reconsidered in light of jurisdictional size. Increase. Consider adding % for population.	Penny Gross CEEPC
32	Target date for inventories should be sooner, end of 2010.	Matt Gray CEEPC
33	Target date for community plans should be sooner. Role for COG to facilitate. All that recd EECBG should prepare plan. Need to define what a plan is. Task EAC to advise on plans.	Brendan Shane, Roger Berliner, Kambiz Agazi CEEPC
34	Should be 100% preparing community wide plans. Need full buy-in.	Allison Bishins CEEPC
35	Target date for tree canopy plan needs to be sooner. Move to beginning of 2011.	Penny Gross CEEPC

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	Measurement, Criteria, Tracking, and Guidance Tasks	
36	Add in metric, jobs created.	Dan Sze CEEPC
37	Need a green jobs plan out of analysis. Need method for classifying green jobs.	Mark Starik -- University consortium could assist. Dale Meaderis CEEPC
38	Develop and track education programs in the schools.	IGBG/EAC
39	Role for COG to prepare/collect data. Inventories should be based on consistent methodology, federal govt to issue guidance on fed govt protocol by end of 2010.	Matt Gray, John Lord CEEPC
40	Define building energy benchmark measurement.	Fairfax Staff
41	Develop guidance on how to revise comprehensive plans to account for greenhouse gases and anticipated outcomes.	Fairfax Staff
42	Standardized approach for greenhouse gas inventories would be beneficial.	Washington Gas, Matt Gray CEEPC
	Other Comments	
43	Standardize program design to create a consistent, common approach across jurisdictions, enhancing consumer education and reducing implementation cost.	Washington Gas
44	Need to look at transparency.	Jay Fisette CEEPC
45	Provide emission estimate instead of simple yes/no.	Erica Bannerman
46	Does 10% reduction take into account growth? Per capita? Per square foot? – Business as Usual assumes growth.	IGBG/EAC
47	For govt green challenge, Increase %?, focus on what can be done, don't set standard too high in early years.	Jay Fisette CEEPC
48	Fairfax has no jurisdiction over airport operations, so local governments should not be listed as responsible party.	Fairfax Staff
49	Change "adopt" to "follow" or "comply with" -- 2. Adopt industry standard protocols to quantify greenhouse gas emissions and reductions for water and wastewater utilities.	Fairfax Staff