

Comments on 1st EnergyWise Draft And Responses

Commenter	Page No/ Issue	Comment	Response
18 persons commented on “smart” electrical meters	5-15 (Smart grid technology)	Commenters were opposed to deployment of smart electrical meters for reasons of 1) health, 2) accuracy, and 3) privacy.	The Board of Supervisors has adopted a resolution addressing this issue. Page 5-15 will be revised to add the following to the end of the first Supporting Action: “...consistent with Board of Supervisors Resolution 2011-62.”
Sierra Club	Chapter 5	Include Community Choice Aggregation (CCA) as a reduction measure.	A reduction measure will be added to the Energy Conservation section of Chapter 5 addressing CCA consistent with the County Conservation and Open Space Element of the General plan.
Paso Robles WCA	Chapter 3	The assessment is lacking tools, data and methodology. Too early to develop strategies.	The Chapter explains that the “ <i>best-available</i> ” tools data and methodology is used in the assessment. There is never perfect information available; the assessment should not wait for unattainable information.
Paso Robles WCA	Page 5-7	Include industry wide stakeholders	Add: “...and stakeholders to develop effective energy conservation....” and “...and to provide incentives for targeted....”
Paso Robles WCA	Page 5-7	Add a bullet regarding recognition of conservation programs and educational outreach	Bullet added to 5-7: <u>Continue to recognize and encourage conservation programs and educational outreach conducted by industry organizations, non-governmental organizations and government agencies.</u>
Paso Robles WCA	Page 5-71	Other programs beside SIP should be encouraged.	Add: <u>Encourage self-assessment programs for other agricultural commodity groups.</u>
Paso Robles WCA	Page 5-77	Further assess sequestration opportunities.	See revised Sequestration measure.

Greg Ellis (One Cool Earth)	Page 5-20	Expand Community Forestry program	Section will be revised per comments.
Home Builders Association	Page 5-2	Explain costs and savings in table on 5-2	An explanatory paragraph will be added to this page.
Home Builders Association	Page 5-5	Does table account for new state energy requirements?	Minimum Title 24 requirements (and future updates to those requirements are accounted for in the Adjusted Business as Usual Forecast. Any exceedance of Title 24 requirements is in this table under Energy Efficient New Development.
Home Builders Association	Page 5-10	Homeowners need more than loans to motivate them to retrofit existing structures due to economic conditions.	Agreed. Emission targets are set 8 years and 23 years into the future to account for such conditions.
Home Builders Association	Page 5-15	Who determines economic feasibility of energy monitors?	The State, through the CPUC, will require such devices and will determine feasibility.
Home Builders Association	Page 5-17	Energy Efficient New development is not consistent with Green Building Ordinance technical review Committee.	Agreed. Revised section will be consistent with the direction of the technical review committee.
Home Builders Association	Page 5-17	Third bullet references amending design plans.	The design plans referenced are community design plans, not individual development design plans. Revised section will clarify.
Home Builders Association	Page 5-18/19	This requirement is confusing and unnecessary.	This section will be revised to reflect the County Green Building Ordinance.
Home Builders Association	Page 5-26	County must first quantify present situations for permit time frames, costs, etc...	Agreed. However, in general, permit fee reductions, removal of qualitative "hurdles" and creation of "single contact points" are known incentives.
Home Builders Association	Page 5-39	Bus system should add inter-city express service to be a valid alternative to an auto trip.	Agreed. The transit accessibility section will be revised to note this.
Home Builders	Page 5-39	What is "an improved mixture of	Improved mixture of land uses are those

Association		land uses”?	consistent with Strategic Growth policies of the General Plan.
Home Builders Association	Page 5-40	How are the figures in Table 5-4 derived?	Appendix A contains the work done to arrive at these figures.
Home Builders Association	Page 5-42	Does the County’s land inventory show how much vacant or underutilized parcels exist?	The 2009 Housing Element contains an inventory of higher density lands in each community. The next update will include underutilized parcels.
Home Builders Association	Page 5-42	Complete streets and neighborhood connectivity conflict with provision of higher density development (Bullet 1)	We disagree with this assertion. Good community design does not have to conflict with provision of higher density development.
Home Builders Association	Page 5-42	6 th bullet promotes “vertical mixed use” that is expensive, difficult to build, sell and insure.	Comment noted. The bullet does not require vertical mixed use in any particular application. It will be provided where feasible. However, clarification will be added to promote all mixed use development.
Home Builders Association	Page 5-42	Half-mile standard in bullet 7 is arbitrary and absurd.	Substantial research has shown that ½ mile is generally the maximum distance someone will walk instead of using a car.
Home Builders Association	Page 5-42	What incentives does the County contemplate to promote mixed use development?	Incentives include density, or height bonuses, or parking reductions.
Home Builders Association	Page 5-46	Where is the County’s analysis of GHG reduction from improved bicycle network?	See Appendix C Section 20.
Home Builders Association	Page 5-48	First bullet is confusing. It seems to say parking will be reduced but must be paid for in other locations.	The bullet will be clarified. It is a simple statement to use in lieu parking fees instead of on-site parking as is done in many communities.
Home Builders Association	Page 5-50	First bullet point is confusing.	The bullet point will be clarified. The concept is to divide parking from the residential use in certain applications so that those who want

			parking can pay for it separately.
Home Builders Association	Page 5-51	Requiring both traffic impact fees and trip reduction programs is unfair and double taxation.	Traffic fees and trip reduction plans are not taxes. Page 5-51 (4 th bullet) will be revised to address this issue.
Home Builders Association	Page 5-51	3 rd bullet sets threshold for a transportation demand management program (TDM) at 25 employees. How is this determined? What happens if employment changes? Who monitors?	In general, TDM programs use 25 employees as the threshold because program options are wider with more employees and the numbers of trips are larger. TDM programs are self-monitoring. Once a program is in place, it can be adjusted to changing conditions.
Home Builders Association	Page 5-52	2 nd bullet; who monitors, etc... see above comment.	See response above.
Home Builders Association	Page 5-55	Table 5-5 asserts water conservation in new development will save more than conservation in the existing 118,000 residences in the county. How is this derived?	Water conservation for new development is mandated through State building codes and will result in a 20% reduction in urban water use. The County's authority to mandate water conservation in existing buildings is more limited and therefore smaller reductions in residential water use are anticipated although there are more existing units than will be built.
Home Builders Association	Page 5-61	1 st bullet sets limits on turf. Who will monitor and enforce?	Landscapes in new development will be reviewed prior to the issuance of building permits to ensure turf limits are met and comply with the County Water Efficient Landscape Ordinance.
Agricultural Liaison Advisory Board (ALAB)	Figure 3-4	Clearly explain GHG emissions are from unincorporated area only. Also, more accurate data is needed	Comment noted. Additional explanation will be provided. Also, different areas have different sector breakdowns of emissions (e.g. most GHG emissions in Yolo County are from agriculture).
ALAB	Page 3-5	There not sufficient data to establish baseline information.	The section highlights that certain emissions cannot be established for baseline purposes (e.g. refrigerants). When additional data is

			available, this Plan will be updated.
ALAB	Page 3-12	Agriculture produces 18% of GHG emissions.	Comment noted.
ALAB	Page 5-7	Agricultural stakeholders should be added to the list.	The list will be modified per the comment.
ALAB	Page 5-18	Incentives will be needed to convert older equipment such as tractors.	This measure affects buildings only and not agricultural equipment.
ALAB	Page 5-20	Forestation partnerships are a step in the right direction.	Comment noted.
ALAB	Page 5-38	Methane captured at landfills could be offered to agriculturists to convert equipment.	Comment noted. It will be considered if found to be economically feasible.
ALAB	Page 5-65	The term “relying on industrial inputs” is misleading.	Comment noted. The term will be revised.
ALAB	Page 5-69	Incentives should be developed that economically help farmers. County should lobby for legislation that encourages good environmental farming practices.	Comment noted. Language will be added per this comment.
ALAB	Page 5-71	The Plan should encourage all agricultural commodity groups to have self-assessment programs. Such programs exist for more than wineries.	The measure will be revised to be more inclusive.
ALAB	Page 5-72	Methane and manure is not easily addressed. Cattle numbers are declining but the Plan shows emissions rising over time.	Manure management is difficult to address for non-confined animals. Page 4-2 shows methane production from livestock declining over time due to declining livestock numbers.
ALAB	Page 5-74	It does not seem feasible for a “Buy local” program to have much GHG reduction value.	Comment noted. The potential reductions are not quantified.

ALAB	Page 5-77	It is recommended that the Plan encourage staying abreast of latest research on sequestration.	Agreed. The measure will be revised to have the County convene a working group of agriculturists, researchers and other experts to explore local opportunities for sequestration.
ALAB	General	Economic feasibility of energy savings program and incentives are important.	Agreed. The Plan is geared to these types of measures.
ALAB	General	Preservation of agricultural lands is an important strategy.	Agreed
ALAB	General	It is beneficial to the community to encourage "buy local" programs in spite of their low GHG reduction potential.	Agreed
ALAB	General	Cattle grazing use rotational grazing, energy efficient water pumping and rangeland management plans.	Comment noted. These activities continue to be encouraged.
ALAB	General	Explore Conservation/Stewardship Program and Specialty crop Research Initiative for funding GHG reduction programs.	Thank you for the suggestion. The Plan will be revised to add these programs.
ALAB	General	ALAB accepts that the Plan used standard formulas for nitrogen calculations	Comment noted.
ALAB	General	ALAB members have additional data addressing better management practices in several areas.	Please provide any additional data that you may have to address better management practices related to agriculture.
ALAB	General	All agricultural commodities must be included as stakeholders in the Plan.	Comment noted. We look forward to continuing to work with all agricultural stakeholders as the Plan is revised, updated and implemented.
Farm Bureau	General	More recognition of sequestration	Carbon sequestration is a complex issue with

		is needed.	many variables to be considered. The Plan calls for additional research before sequestration can be quantified.
Farm Bureau	Pages 2-4/10	Prevention of wildfires should be considered including keeping land in agricultural production through programs such as the Williamson Act.	Comment noted. The plan will address the issue in the Adaptation chapter.
Farm Bureau	Page 3-9	What is the definition of "industrial fertilizers"?	This term will be removed from the Plan.
Farm Bureau	Page 3-10	What is considered "traditional farming" versus non-traditional farming?	The terms will be removed from the Plan.
Farm Bureau	Page 3-12	Agriculture is only 18% of GHG emissions. Williamson Act is a good way to keep agriculture's GHG low.	Comment noted.
Farm Bureau	Pages 3-13 and 4-3	How much of the "Other-off road equipment" category is non-agriculture.	All off-road emissions in the inventory are from agriculture.
Farm Bureau	Page 5-20	How does the planting of trees near structures fit with fire clearance requirements?	Fire clearance near structures takes into account type, height and horizontal placement of trees, shrubs and ground cover. Correctly designed landscaping including trees can be both fire safe and can have shading value.
Farm Bureau	Page 5-26	Collaboration with stakeholder groups is a positive step for creating incentives.	Agreed. The plan emphasizes this point.
Farm Bureau	Page 5-47	Some back country roads are not appropriate for bicycle and pedestrian facilities.	The measure primarily addresses urban areas where facilities can be used to reduce VMT. Back country roads are generally used for recreational pursuits.
Farm Bureau	Page 5-65	The term "industrial inputs"	The term will be clarified or revised.

		needs to be changed or clarified.	
Farm Bureau	Page 5-66	Livestock terms (e.g. pigs and hogs) need to be corrected.	The information will be revised.
Farm Bureau	Page 5-69	Should sequestration be part of agricultural energy conservation?	Sequestration is included as its own measure later in the section.
Farm Bureau	Page 5-70	It should be noted that agriculture has already embraced management practices that reduce GHG emissions.	Comment noted. Additional language will be added to note that activities will continue.
Farm Bureau	Page 5-72	Manure collection on rangeland is not realistic.	Comment noted. Methane from livestock is part of the county emissions and therefore should be addressed in the Plan. Please recommend other measures that are more realistic to address this issue.
Farm Bureau	Page 5-74 Page 7-18	Community gardens and farmers' markets are not appropriate as a progress marker.	The measure calls for encouraging both community gardens and local markets. While GHG reductions may not be large, the measure reflects the public's willingness to participate in these activities.
Farm Bureau	Page 5-77	We strongly agree that a sequestration assessment for agriculture and other lands is needed.	Comment noted. We will ask stakeholder to assist in these efforts.
Farm Bureau	Page 7-18	Zero emissions tractors are at the prototype stage. It is unlikely this target can be met without major funding to purchase equipment.	The measure will be revised or removed from the Plan.
Water Systems Consulting, Inc.	Community wide Inventory	The Inventory does not appear to include GHG associated with energy used by water providers. This information should be obtained from water providers.	GHG emissions from water are part of the overall communitywide electricity use calculations. Inventory protocols generally require the public agency with control over the resource to include it in their GHG inventory.

			Community Services Districts have not yet prepared Climate Action Plans.
Water Systems Consulting, Inc.	Page 2-11	State Water Project should be included as an impact of climate change.	The Plan will be revised to include a chapter on climate change impacts and adaptation.
Water Systems Consulting, Inc.	Page 4-4	Water use reductions per SB 7-7 should be considered in the Plan.	Approximately eight of the 144 water purveyors are subject to SB 7-7. The Plan may, in the future, attempt to quantify per capita water use reductions based on programs similar to SB 7-7. At this point, the new Cal Green Building requirements do allow for a 20% reduction in water use.
Water Systems Consulting, Inc.	Appendix B and C	State Water Project (SWP) energy is not included in the baseline.	The SWP is not under the County's control, and pursuant to baseline protocols, is not part of the County's GHG emissions.
Water Systems Consulting, Inc.	Appendix C	Which of the 2 CEC reports listed is used to derive energy use for water deliveries?	The kWh per million gallons of water use in the second CEC report was utilized. The first report provides a bit more background information on how those numbers are derived.
B.K. Richards	General	Include a summary of the top 10 reduction measures. The Plan could be far shorter.	The Executive Summary (ES) will be revised to include this information. Some technical information will be moved to an Appendix.
B.K. Richards	General	What happens if the measures do not reach the 15% reduction?	There is no sanction for not reaching the goal. The Plan is structured to use feedback to adjust the measures as the target year 2020 is approached. This will be explained in the Executive Summary.
B.K. Richards	General	Use of 2/3 of the page seems wasteful.	The format follows the standard established by recent documents produced by the Department and improves readability. The Department is moving toward electronic documents that are not meant to be produced on paper.
B.K. Richards	General	Adaptations are missing and	The Plan will be revised with the next draft to

		important.	include a chapter on adaptation.
B.K. Richards	General	A statement from county leaders is appropriate.	Agreed. Such a letter will be included once the Plan is adopted.
B.K. Richards	General	Provide an option to energy upgrades through a mitigation fee.	Page 5-12 will be revised to mention a mitigation fund as an alternative.
B.K. Richards	General	Land Banking is not mentioned.	Land banking will be added at page 5-42 under Strategic Growth.
B.K. Richards	General	Will actions be taken by the County such as upzoning, increasing certain height limits, and reducing parking requirements for high density housing?	These strategies are part of both the COSE and Framework For Planning and are included in the Strategic Growth measures on page 5-42 and the parking measures on pages 5-48 to 5-50.
B.K. Richards	General	It's very inefficient for each jurisdiction to do its own CAP. Should there be one Plan plus plans for specific areas controlled by the cities?	A CAP that addresses the county as a whole with separate, city specific chapters is an excellent suggestion. Future efforts should move in that direction.
B.K. Richards	General	Include a summary of information to be tracked on an annual basis as part of the Executive Summary.	There is a significant amount of information related to each reduction measure to be tracked as this Plan is implemented. The Implementation Chapter is the most appropriate location for these details to be summarized.
B.K. Richards	General	It would be useful to know how much CO2 is in the air. Should the County be actively participating in research?	The Plan does have the County partnering with other agencies and private organizations for research purposes. However, the research is on sector and county-specific issues, not the more global questions.
B.K. Richards	General	Should the County participate directly in programs to better model vehicles miles traveled (VMT)?	The Plan relies on traffic models developed by SLOCOG as part of the Regional Transportation Plan (RTP) and then revised for the Plan. The County will continue to work cooperatively with

			SLOCOG on VMT issues, including using different techniques to calculate VMT.
B.K. Richards	General	A better measure of emissions could be from fossil fuel sales in the county.	While fuel sales may be a more accurate measurement than VMT, it is difficult to determine what percentage of the fuel sales volume actually occurs from trips generated or ending in San Luis Obispo. Many fuel sales may occur as a result of a pass through trip The Plan relies on trip generation calculations from the RTP.
B.K. Richards	ES	There is still confusion regarding California's goal of 1990 GHG levels by 2020 and the County's 15% below baseline by 2020.	The relationship between the two goals will be explained in the Executive Summary through a graphic depiction
B.K. Richards	ES	Diagrams like E-3 should have units	The diagrams will be revised to include units where appropriate.
B.K. Richards	Page ES-3	CEAP is not explained.	The acronym will be deleted or revised.
B.K. Richards	Page ES-5	There is a discrepancy between how much GHG reduction can be achieved through the solid waste sector and its contribution to total GHG emissions.	While the 2035 GHG reduction from the waste sector (31,750) exceeds total 2006 baseline GHG emissions from waste (30,540), waste GHG emissions in 2035 are anticipated to be more than 41,000 MTCO _{2e} per year. This means that in 2035 GHG emissions from waste will still total nearly 10,000 MTCO _{2e} .
B.K. Richards	Page 1-8	Better explanation of units (e.g. tonnes) is needed.	Additional information will be provided.
B.K. Richards	Page 2-2	The word "established" is not appropriate.	The word "recognized" will be used instead of "established".
B.K. Richards	Page 2-2	Figure 2-2 is too small. The green circles are not explained. Temperatures are in centigrade.	The Figure will be improved or replaced.
B.K. Richards	Chapter 2	Chapter 2 can be shortened.	The Plan will be revised to shorten Chapter 2 and create an Appendix of needed information.

B.K. Richards	Figure 3-1	The figure does not reflect the ratios described in the figure.	If drawn to scale, this image would be significantly larger than the document allows. A note that the image is not drawn to scale will be inserted.
B.K. Richards		The use of propane is important in this county but is not included in the GHG Inventory.	The difficulties in estimating the use of propane are numerous. However, the Plan will be subject to “continuous improvement” that may develop a valid methodology for propane and other fuels.
B.K. Richards	Page 3-9	Is the 660 million mile VMT number higher or lower than before?	The 660 million miles of annual VMT is lower than the original method (all VMT for all purposes occurring in the unincorporated county) of calculating transportation related GHG emissions.
B.K. Richards	Page 4-2	Why does the use of off-road equipment decline over time?	The California Air Resources Board’s OFFROAD 2007 Software incorporated gradual increases in fuel efficiency and phase out of older equipment over time. Use of ag equipment in SLO county is projected to increase while fuel consumption decreases from these minor improvements.
B.K. Richards	Page 4-9/11	County operations emissions decreased in 2010. Should not community-wide emissions shall a drop also?	The 2010 decrease in County operations was due to quantifiable changes in County government such as a smaller employment base, commute time and distance, implementation of energy efficient equipment in County buildings, etc... Communitywide analysis has not been completed for 2010, and may show a corresponding decrease in emissions.
B.K. Richards	Chapter 5	Chapter 5 needs a summary table at the beginning that includes the percent reduction in each sector.	Both the executive summary and the end of Chapter 5 include such a summary table.
B.K. Richards	Page 5-22	There has been progress in	Correct, as tracked by the number of small-scale

		small-scale renewable energy projects between 2006 and 2010?	renewable energy permits issued in the unincorporated jurisdiction between 2006 (baseline) and 2010.
B.K. Richards	Page 5-20	The claims for bicycle networks and parking supply limits seem out of proportion with what has generally been achievable.	The parking supply reductions are under review and may be revised in the Public Hearing Draft. Bicycle network reductions are based on increasing bicycling opportunities, resulting in a 2% reduction in countywide VMT.
B.K. Richards	General	There has been a degree of debunking of VMT reductions through land use planning. Is this taken into account?	The major land use measure in the Plan, Strategic Growth Implementation, is included in the business-as-usual forecast for transportation emissions as those changes in land use were included in SLOCOG's Regional Transportation Plan model. Additional GHG reductions are not taken in the Strategic Growth strategy
Jim Cole (Transitions Initiating Hub Group)	Page 5-74	Include a local foods program for purposes of food security, local economic development, health and other benefits.	The Plan will be revised to include programs as recommended.