



Climate Change & Sustainability Initiative

Skagit County, Washington

Ryan Walters
Sustainability Admin

Anna Gay
GHG Analyst

Callie Martin
Recycling Educator

Memorandum

To: Board of County Commissioners
From: Ryan Walters, Sustainability Administrator
Date: February 15, 2010
Re: Climate Action Plan Changes and Responses to Public Comment

Staff have prepared this document to summarize the changes between the final draft Climate Action Plan as proposed to the Board of County Commissioners and the Public Review Draft released in December 2009. Nearly all changes are very minor; most large changes occurred in the Daily Operations Policies.

Changes since Public Review Draft

Major changes since the public review draft are listed below. Typos and other minor changes are not included.

Part 3: Greenhouse Gas Inventory

- Added paragraph to clarify that charts do not include GHG emissions from large industrial sources such as the refineries and Sierra Pacific that are not currently required to report CO₂ emissions.
- Added paragraph to clarify that charts do not include large potential avoided GHG emissions from increased recycling and waste reduction.

Part 4: Daily Operations Policies

General Policy Goals

- Text change to clarify that policies are to be integrated into existing trainings.
- Additional instruction to Human Resources to include Daily Ops policies in new employee trainings.

Appliances

- Text change to distinguish between space heaters and other personal heating devices.
- Additional instruction to sustainability staff to provide guidance on selecting CFLs for color temperature and performance.
- Change to instruct department heads to remove unauthorized appliances rather than Facilities staff.
- Change to instruct department heads to designate staff member to turn off common-use devices; designation of custodian as fall-back.
- Additional instruction to locate paper handling devices away from employee work areas.

- Additional requirement for common area refrigerators to be Energy Star-compliant.
- Additional instruction to Facilities staff to identify and test non-compliant devices.

Solid Waste and Recycling

- Additional policy to speed the transition to a paperless office environment.
- Additional policy to transition from personal waste disposal bins to common area disposal bins.
- Additional instruction to staff to seek opportunities to reduce paper consumption.
- Additional instruction to staff to participate in recycling programs and use correct bins.

Vehicles and Fuel

- Additional instruction to Human Resources to integrate fuel efficiency into existing trainings.
- Additional instruction to ER&R to implement the policy recommendations of vehicle fleet consultant.

Heating, Ventilation, and Air Conditioning

- Additional instruction to Facilities staff to install lockboxes or auto lockouts to enforce set points where necessary.
- Additional line item in set points chart to set data center temperatures to ASHRAE recommendations.

Part 5: Taskforce-Recommended Initiatives

Outreach and Education

- Policy A-8 modified to include more than just webpage development.
- Policy A-10 modified to include creation of a Sustainability Coordinator position
- Policy A-14 (renumbered A-11) modified to require creation of a fulltime Recycling Coordinator position and eliminate EECBG grant as funding source
- New policy A-13 to facilitate carpooling among employees

Energy Conservation & Renewables

- Policy B-1 modified to provide \$50,000 in EECBG grant funding for RCM program
- Policy B-7 modified to define permit fee reduction as a pilot program funded by EECBG grant, and to not raise permit fees on traditional construction
- Policy B-10 modified to clarify that the County is only exploring such a program, not committing to it

Solid Waste

- Policy D-2 modified to clarify that PDS should propose implementing regulations.
- Policy D-3 modified to include all food containers, not just beverage containers.
- Policies D-5, D-8, D-9, D-15 modified to designate the Recycling Coordinator as lead agency.
- Policy D-12 modified to pursue LEED Silver Certification for the proposed jail and transfer station, as to pursue certification as existing buildings for 1800 Continental Place and the new Ferry Terminal

- Policy D-18 modified to require food vendors at the County jail to comply with County sustainability policies via their contracts.

Part 6: Taskforce-Recommended Land Use Planning Policies

- Countywide Planning Policies modified to remove some specific text recommendations, notably quotas on issuance of building permits in CPP 1.2. Several policies entirely removed because they did not make sense within the framework of countywide coordination of planning as described in RCW 36.70A.210.
- Chapter now includes direction to Public Works to actually require sidewalks when county code requires sidewalks.
- Adjusted goal of 100,000 new tree plantings from 2011 to 2015.
- Deleted recommendation to advocate for reform of state sales tax system.

Responses to Comments

Lori Wight

Comment: Please consider recommending an alternative work schedule (e.g. four 10-hour days).

Response: Thank you for your comment. Four-day work weeks have potential to reduce energy consumption by allowing building shutdowns during an extended weekend—but only if the entire building is unoccupied, i.e. all relevant departments participate. The potential for energy conservation should be included in any analysis of whether to adopt a four-day work week, but the Taskforce makes no recommendation as to whether one should be adopted at this time.

Michael See

Comment: Policy C-5, IPM practices, may help the County comply with our NPDES Phase II permit requirements.

Response: Thank you. We will incorporate that information into the co-benefits column.

Ron Harris

Comment: Supports recommendations, encourages Commissioner adoption.

Response: Thank you.

Pete Haase

Comment: Suggests alternate grouping and prioritization of policies.

Response: We plan to develop a Gantt chart for commissioner-approval prioritizing and scheduling policies for implementation based on available staff resources.

Comment: Suggests addressing adaptation to climate change impacts.

Response: We plan to address adaptation in separate processes, such as Alternative Futures (see CAP introduction).

Comment: County website is not currently easy-to-read or navigate, so policies encouraging additions to the website may be ineffective.

Response: We plan to work around the website's deficiencies.

Kerri Cook, Facility Operations Specialist, North Cascades National Park Service

Comment: "very pleased to see the serious development of a Climate Action Plan."

Response: Thank you.

Margo Gillaspy

Comment: Inventory should be revised to indicate methane is "emitted" from Inman Landfill rather than "leaked."

Response: Agreed. Thank you.

"Island Conscience" [Pseudonymous Comment]

Comment: apparent complaint about limited time for public comment.

Response: The formal public comment period for the proposal was two weeks, including a public workshop on December 14. Staff continued to accept comments for an additional seven weeks following closure of the formal comment period. The commenter did not submit substantive comments.

Juby Fouts

Comment: "Sincere thanks to all those who participated in this most timely effort" to develop the plan.

Response: Thank you.

Bob Anderson

Comment: "Top job... Tell the commish's I want this approved."

Response: Thank you.

Joost Businger and Marianne Kooiman

Comment: Because it allows for tradeoffs for other environmental values, LEED certification does not guarantee energy efficiency. Suggest restriction to energy efficiency standards for building permit fee reduction.

Response: Thank you for your comment. We are aware that LEED certification provides for features other than energy efficiency; it is appropriate for a plan that is broadly focused on sustainability. Because we have modified the permit fee reduction initiative to be funded by our energy grant, however, we have implemented your suggestion.

Steve Crider

Comment: Policy A-8 should be expanded for additional outreach.

Response: Thank you. We have made that change.

Comment: Policy A-9 should be expanded to support sustainable agriculture through a variety of programs.

Response: Thank you. Policy A-9 is not agriculture-specific. Skagit County has limited staff, expertise, and funding for promotion of sustainable agriculture.

Comment: Policy A-11 would be complemented by an ongoing citizen advisory board.

Response: Staff recommends ongoing community outreach and periodic review of the plan, but not an ongoing citizen advisory board that requires significant staff time.

Comment: Policy A-12 regarding IPM management of county lands will require significant funding, training, and staff.

Response: Noted; with phased implementation, we believe cost will be minimal.

Comment: Policies D-14-21 in support of composting are wonderful and should be integrated into other solid waste policies.

Response: Thank you.

Comment: Existing land use policies requiring replanting after harvest and preservation of steep hillsides should be strongly enforced.

Response: Agreed.

Comment: We should highlight efforts to make Skagit County an agro-tourism destination and emphasize the role agriculture can play in efforts to reduce climate change.

Response: Agreed. We believed this is addressed in the land use chapter.

Comment: Policy to plant 100,000 trees by 2012 could be a comprehensive outreach effort and help local native plant producers.

Response: Agreed.

Cori Ertel, Skagit-Island County Builders Association

Comment: SICBA believes CAP has many positives, and is pleased to see much of the Plan favor incentives rather than mandates on private enterprise.

Response: Thank you.

Comment: in Policy B-7, building permit fees for traditional construction should not be increased to offset reduced fees for energy efficiency.

Response: We have removed this provision because under state law, permit fees may not exceed actual cost of processing.

Comment: in Policy D-11, SICBA can provide training associated with the Built Green program, but not LEED certification.

Response: Corrected.

Comment: on page 65, change wording to clarify tree planting would be incentivized, but not required, for private construction projects.

Response: We wish to leave this language flexible. Implementation will require additional public process.

Comment: on page 67, SICBA would prefer the county not establish a minimum compliance target for retrofits and new construction for energy efficiency.

Response: Modified to “consider establishing a minimum compliance target.” Implementation will require additional public process.

Comment: on page 68, CPP 1.2, SICBA believes refusal to issue building permits would endanger private property rights.

Response: We have remove this provision over legal and logistical concerns about arbitrary quotas on the number of building permits issued.

Comment: on page 68, CPP 2.11, SICBA is concerned about a de facto moratorium on residential development outside urban centers due to increased VMT.

Response: CPP 2.11 concerns only industrial, not residential development. But for the reasons cited above, we have removed the draft CPP text.

Robert and Naomi Cummings

Comment: Plan “represents a lot of good work with sensible, measurable and cost effective tasks that can be accomplished.”

Response: Thank you.

Ed Knight, Swinomish Indian Tribal Community

Comment: Requests addition of legend block to Swinomish Climate Change Initiative maps and specific text changes to captions.

Response: Thank you. We have made these changes.

Tim Trohimovich, Futurewise

Comment: Futurewise believes CAP is very good, and urges Skagit County to adopt and implement.

Response: Thank you.

Comment: The draft climate action plan would be strengthened if the county attempted to model the emissions reductions that would be achieved by the policies and programs to determine if the county has a plan that would achieve its reduction targets.

Response: We agree. Using ICLEI’s CACP software, our GHG inventory analyst calculates that by meeting just the 15% energy reduction goal in our proposed Daily Operations Policies, we will reduce our municipal GHG emissions by 500 tons of CO₂e in just one year—approximately 4.7%, putting municipal GHG emissions ahead of our targets.

Community emissions reductions measures are much more difficult to estimate with any degree of certainty. With limited staff resources, we did not attempt to calculate such reductions.

Comment: Futurewise recommends against encouraging clustering on forest lands of long-term commercial significance as recommended in Implementation Measure 1 on page 63.

Response: We have de-emphasized this policy, however we do favor clustering (without density bonuses) to reduce the footprint of development.

Comment: Futurewise recommends prohibiting residential development on forest land, other than housing for those employed on forest land, as Whatcom County does.

Response: The Taskforce favors retirement of development rights on forest land to preserve working forests. However, the Forestry Advisory Board has indicated that foresters need development rights in order to obtain mortgage financing, even if the development rights are never exercised. The Taskforce did not recommend implementing the Whatcom County policy at this time.

Skagit County Forestry Advisory Board, via Kendra Smith

Comment: FAB submitted text about carbon sequestration related to old growth forests.

Response: The FAB was responding to a comment by a member of the public reported in the [Skagit Valley Herald article of December 15](#) on the County's public comment workshop:

David Goehring of Sedro-Woolley asked the task force to change a policy proposal to emphasize the importance of preserving mature forest land.

"The most important thing we can do is preserve our mature forests," Goehring said, explaining that older growth processes more carbon dioxide and retains more flood waters.

The Climate Action Plan did not prioritize preservation of mature forests. We have added text in the background Forests section to reflect the scientific consensus that forest carbon sequestration is related to tree growth rates, not age, and forest products continue to sequester carbon after harvest.

Mike Almvig, Skagit County Information Services Department

Comment: IS supports the Climate Action Plan and its requirement to purchase EPEAT-compliant devices. IS would like a waiver for specific non-standard situations.

Response: Thank you. We agree waivers should be able to non-standard situations. A waiver scheme should be detailed in a resolution adopting the County's Environmentally-Preferable Purchasing Policy.

Comment: Prefers to implement "improved power management functionality with reducing power consumption over the next few years over shutting computers off at night" to "the distribution of software to systems, which we attempt to do on non-business hours in order to minimize disruption to business activities as much as possible."

Response: There are substantial potential savings associated with shutting off (or hibernating) computers at night. By default, Windows installs updates at shutdown, avoiding disruption to employee work flow. We understand IS's position has since changed to support nighttime shutdown.

Comment: IS must run Windows XP as local administrators for compatibility with existing software; that allows users to override power management settings. Windows 7 will allow us to eliminate administrator privilege and better control power management settings.

Response: We recommend overriding user-configured power management settings with logon scripts. We encourage a faster transition to Windows 7.

Comment: Prefers that IS's Electricity Conservation Plan govern data center HVAC set points rather than CAP Daily Ops Policies.

Response: We have revised the set points for data centers based on the current recommendations of the American Society of Heating, Refrigerating and Air-Conditioning Engineers.

Comment: Hewlett-Packard charges for damage to printers caused by non-HP or refilled toner cartridges.

Response: We understand that printer manufacturers will not warranty repair their devices for damage caused by third-party or refilled toner cartridges; the CAP indicates remanufactured toner cartridges should meet Standardized Test Methods Committee (STMC) specification and those purchased under contract should have performance guarantees.

Mike Elde, Skagit County Equipment Rental & Repair Division

Comment: GHG inventory 2006 estimate for vehicle miles traveled for Operations seems low compared to other departments that have a high number of vehicles.

Response: Thank you. There are a few things that account for this disparity:

- Many of the vehicles attributed to operations are heavy machines so they don't have mileage records.
- Mileage records were unavailable for vehicles that had been sold.
- VMT figures are very rough estimates from CACP so it's possible that they don't reflect our actual use.

It's important to keep in mind that emissions calculations are based on fuel records, not VMT, so any uncertainty in VMT calculations does not affect the overall emissions picture.