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To: <pbarthol@energy.state.ca.us>
CC: "AB32 Core" <AB32Core@exchange.pge.com>
Date: 5/21/2008 9:32 AM
Subject: Comments on the LUSCAT submission to the CARB Scoping Plan

Dear Panama:

Thank you for the opportunity to submit comments on the Land Use Subgroup of the California Climate Action Team (LUSCAT) submission to the CARB Scoping Plan. Some of our comments may pertain to other sections of the scoping plan (such as green building), but we wanted to make sure that the following issues are incorporated in the CAT team's final submission to the CARB scoping plan:

1. Community Renewable Energy Access We agree that how our communities are designed and built has a significant impact on the state's greenhouse gas emission levels. In addition to reducing vehicle miles traveled with the appropriate location of new development and the promotion of urban infill projects, we suggest that you encourage local jurisdictions to consider access to renewable energy such as solar energy, daylight, and wind. It is important that height, setbacks from the property line, exterior aesthetic design restrictions, yard projections, lot orientation, and lot coverage requirements actively promote the installation of renewable energy systems and the effective daylighting of buildings. While this issue may be covered in the green building report, we feel it is also an issue which should be considered by local governments as they restructure their zoning and building code laws to address climate change.

2. Urban Heat Island Effect For millions of Californians living in and around cities, heat islands are of growing concern. Often urban and suburban temperatures are 2° to 10°F hotter than nearby rural areas. Elevated temperatures can impact communities by increasing peak energy demand, air conditioning costs, air pollution levels, and heat-related illness and mortality. While much of the heat island effect can be mitigated through the appropriate specification of materials on buildings, such as green or light colored roofs/ paving, it will be important for local governments to consider the impact of the amount of paving, street paving materials, and vegetation planning to specifically reduce the impact of heat islands due to public works projects.

Finally, In an effort to synchronize the development and deployment of LEED rating systems while creating capacity to respond to previously underserved markets, the LEED Steering Committee recently undertook a reorganization of the existing LEED Rating Systems. The resultant prerequisite/credit structure is a consolidation, alignment and updating of all existing LEED Rating Systems into their "most effective common denominator". The LEEDND standards listed on page 62 of the LUSCAT report may not be in effect at the end of this year, and it may make sense to write in the "LEED Rating System" as a generic substitute for LEEDND until the final direction of the LEED program is determined.

Again, thank you for the opportunity to submit comments. If you have any questions, please email or call.

Sincerely,
Nick Rajkovich

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