

DETRICH B. ALLEN
GENERAL MANAGER

BETH JINES
ASST. GENERAL MANAGER

200 N. SPRING STREET
ROOM 2005 MS 177
LOS ANGELES, CA 90012
(213) 978-0840



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December 5, 2008

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Subject: City of Los Angeles Comments on the Proposed Climate Change Scoping Plan – October 2008

Dear Chairman Nichols:

The City of Los Angeles provides the following technical comments on the "Climate Change Proposed Scoping Plan – October 2008." These comments support and enhance the comments previously submitted and approved by the City Council on the Draft AB32 Scoping Plan (letter dated August 6, 2008).

GENERAL COMMENTS

GHG reductions from transportation sources. Regional targets for emission reductions from transportation sources should give credit for early actions taken by local governments, including sustainable land use and transportation strategies already in place. Development in infill areas should be credited, not penalized, for increasing land use density and reliance on existing infrastructure.

To further the ability of local governments to increase densities, the State should emphasize funding targeted to upgrading existing infrastructure in dense areas, which will bear an increased burden and provide a cost-effective use of funds. One goal of increased density along transit corridors and centers is to reduce new development in outlying areas; additional funding for upgrades in already urbanized areas will help put these development projects on a more equal footing.

Given that the largest benefits from regional transportation plans are expected after 2020, long-term growth dynamics should be addressed statewide and regionally. In addition, state funding for public transit and related programs must continue to be available to support the transportation infrastructure needed to support changing land use patterns. State actions to assign the full cost of carbon-intensive fuels to vehicle users will help local VMT reduction



policies be more cost competitive and effective when compared to the more traditional "drive alone" responses.

The City supports and expects that, as a local government and provider of Essential Public Services, the City will continue to be exempted from the cap and trade program. More detailed comments are found in our August 6, 2008 letter.

In light of all of their responsibilities, local governments continue to need technical and financial support. We cannot pass along the increased costs of upgraded infrastructure, lower-emitting work vehicles, and public education and outreach efforts to engage our communities in this effort. Funding, incentives, and clear, cost-effective regulations will assist us greatly in these efforts.

We strongly agree that progress must continue in reducing criteria and toxic pollutant emissions as we pursue GHG reductions. We strongly encourage the state to place great emphasis on achieving co-benefits of criteria and air toxic pollutant reductions when developing GHG reduction programs.

SPECIFIC COMMENTS

Sec. IIB, p. 27 (Role of Local Government).

It should not be assumed that all local governments possess an upward business-as-usual trend for GHG emissions. In fact, many local governments have worked diligently for years and have already changed their business-as-usual to a downward trend. Therefore, to set a target to match the State commitment of 15 percent from current levels by 2020 penalizes local governments who have taken early actions or have otherwise avoided "typical" emissions. A requirement should be made, or an option should be provided, for local governments to measure reductions from the internationally vetted baseline year of 1990 to match the intent of AB32 and the Kyoto protocols.

Sec. IIB, p. 27 (Role of Local Government)

The discussion of local governments' "move toward establishing similar goals for community emissions that parallel the State commitment to reduce greenhouse gas emissions by approximately 15 percent from current levels by 2020" significantly overlaps with the "Regional Transportation-Related Greenhouse Gas Targets" discussion and should be moved to and reconciled with that section. As noted above and in the City's earlier comment letter, the bulk of emission reductions from local government actions are expected to occur after 2020 and rely on behavior changes by residents and businesses in our communities.

Sec. IIB, p. 47, (Regional transportation-related Greenhouse Gas Targets)

The proposed scoping plan relies heavily on implementation of SB375 to establish regional transportation-related targets. Depending on where those targets are set, local governments may have a substantial burden to reduce community-wide emissions in a relatively short time frame. The additional 15% reduction suggested in Section IIB must be carefully considered in light of tight budgets.

Further, we are unsure how quickly emission reductions from land use and transportation planning strategies will accrue, but we know that they will be heavily dependent on turnover of

existing land use patterns. The revised 5 million metric tons figure for transportation-related reductions is a good starting point, but may need to be somewhat revised during the SB375 process.

Sec. IVB, p. 101 (Public Outreach and Education)

The Climate Action Team should include members of community organizations and faith-based communities on the Steering Team for public education. This will provide better coordination between state/public agencies and the target audiences they wish to educate.

Appendix C, p. 132 (Increasing Water Use Efficiency)

The five State agencies (DWR, CEC, CPUC, SWRCB, and DPH) plan to increase water use efficiency in ways that may reduce the quantity of urban runoff. These methods include Best Management Practices (BMPs), landscape water use, analytical tools, and regulatory actions. The City agrees with the need to improve water use efficiency, the use of BMPs, and working on landscape water use. The City looks forward to the details of the regulatory actions and analytical tools to be developed to improve water use efficiency.

Appendix C, p. 134 (Reuse Urban Runoff)

The report suggests that urban runoff should be captured for reuse, thus saving energy moving it from northern to southern California. The City agrees that saving urban runoff can be a positive move to both reduce urban runoff pollution and energy use by reducing the need for water from northern California. The City looks forward to working with the SWRCB to develop the methods of urban runoff reuse.

We appreciate the opportunity to provide these comments and look forward to working with your staff as implementation of the Scoping Plan begins. If you have any questions, we would be happy to address them. I can be reached at (213) 978-0840 or you may contact Beth Jines, Assistant General Manager of EAD, at (213) 978-0850.

Sincerely,



Detrich B. Allen
General Manager

cc: Honorable Jan Perry, Councilmember
Nancy Sutley, Deputy Mayor for Energy and Environment