

Subject:  
Comments on Draft Policy Statement on Voluntary Early Actions  
From:  
"Cheung, Andrew" <[andrew.cheung@lausd.net](mailto:andrew.cheung@lausd.net)>  
Date:  
Tue, 19 Feb 2008 16:45:01 -0800  
To:  
[ccplan@arb.ca.gov](mailto:ccplan@arb.ca.gov)  
  
To:  
[ccplan@arb.ca.gov](mailto:ccplan@arb.ca.gov)

The Los Angeles Unified School District (the District) requests that the Policy Statement on Voluntary Actions to Reduce Greenhouse Gas Emissions include a provision that provides guidance for public agencies, and recognizes the historic and current efforts of public agencies to reduce greenhouse gas emissions. For example, the Policy Statement should be revised so that the term "companies" is changed to "entities" to encourage and reward the voluntary reductions of both private companies and public agencies.

In addition, we support the inclusion of provisions in the Scoping Plan that provide financial incentives, credits and/or offsets to public entities as part of encouraging and rewarding voluntary reductions and avoiding disproportionate impacts on low-income communities that public entities like the District serves.

Among other measures, the District has undertaken numerous energy efficiency projects such as lighting upgrades and boiler/chiller retrofits and has replaced some of its older diesel bus fleet with newer compressed natural gas buses. To the extent that these projects and other measures that reduce greenhouse gas emissions are not otherwise mandated by existing regulations, they should be given credit as voluntary early actions. We encourage the California Air Resources Board to adopt the Policy Statement on Voluntary Actions with the District's minor modifications above at its next scheduled Board meeting.

Andrew S. Cheung

Associate General Counsel

Los Angeles Unified School District

333 S. Beaudry Ave., 23rd Floor

Los Angeles, CA 90017

Tel: (213) 241-4978

Fax: (213) 241-8386