COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
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Ms. Mary D. Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Nichols:

COMMENTS REGARDING THE 2017 CLIMATE CHANGE SCOPING PLAN UPDATE: THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET AND DRAFT ENVIRONMENTAL ANALYSIS

Thank you for the opportunity to comment on the 2017 Climate Change Scoping Plan Update (Proposed Plan). The County of Los Angeles Department of Public Works appreciates your efforts to coordinate an inclusive stakeholder process. We believe collaborative efforts, such as these, help to identify the most economically feasible and environmentally beneficial ways to reduce greenhouse gas emissions from all sectors of our economy. Enclosed are our comments on the Proposed Plan for your consideration.

Public Works understands local governments will play an important role in achieving California's greenhouse gas reduction goals. We look forward to working with the California Air Resources Board and other State agencies as various measures and programs are developed to implement the Proposed Plan.

If you have any questions about our comments, please contact me at (626) 458-4008 or safshari@dpw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works

SHARI AFSHARI
Deputy Director

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Enc.

COMMENTS REGARDING THE 2017 CLIMATE CHANGE SCOPING PLAN UPDATE: THE PROPOSED STRATEGY FOR ACHIEVING CALIFORNIA'S 2030 GREENHOUSE GAS TARGET AND DRAFT ENVIRONMENTAL ANALYSIS

The County of Los Angeles Department of Public Works' comments on the 2017 Climate Change Scoping Plan Update (Proposed Plan):

- Expand the Proposed Plan to include a more detailed discussion of specific actions the State will implement to achieve the Greenhouse Gas (GHG) reduction goals in the Proposed Plan. For example what actions will be taken to:

    - Increase organics markets, which complement and support other sectors.
    - Resolve issues of pipeline injection and grid connection to make renewable energy projects competitive.
    - Make significant progress in Zero Emission Vehicle (ZEV) penetrations in nonlight-duty segments.
    - Promote all feasible policies to reduce Vehicle Miles Traveled (VMT).
    - Incentivize methane-capture systems at wastewater treatment plants to produce renewable electricity, transportation fuel, or pipeline biomethane.
    - Facilitate the development of alternatives to landfills, including Conversion Technologies in addition to biomass conversion and anaerobic digestion.

- Expand the Proposed Plan to include the development of Conversion Technology facilities as part of the goals for the waste management sector given their capability to handle a wide variety of wastes for which other processes, such as anaerobic digestion, composting, and recycling, may not be suitable.

  Conversion technologies are a wide array of noncombustion thermal, biological, and chemical technologies capable of converting post-recycled residual solid waste into renewable energy, renewable fuels, and/or useful products. The conversion of postrecycled municipal solid waste is essential to achieve the goals identified in the Proposed Plan: such as maximizing diversion from landfills, developing a sustainable low-carbon waste management system, and mitigating climate impacts beyond 2050.

- Include a specific goal for the development of low-carbon fuels, such as biofuels, similar to the 100 percent sales goal for zero emission vehicles.

  Low-carbon fuels can have an even greater greenhouse gas reduction over ZEVs because generating electricity for ZEVs creates upstream power plant emissions, whereas many biofuels can be produced with negative carbon intensity.

- Include a goal in the waste management sector to conduct a lifecycle and cost-effectiveness study of emission-reduction strategies for the solid waste sector.

  This would allow the Air Resources Board to develop specific programs and policies that are most effective in reducing GHG emissions from the solid waste sector. One example would be a lifecycle comparison of different end uses of organic waste (biofuels, electricity, pipeline biogas, and compost), including carbon and water savings from different soil amendments. Another example would be the cost effectiveness of GHG reductions per ton of CO2e reduced for different organic waste-diversion strategies.

- Provide further information on the roles, responsibilities, and funding commitments expected from public agencies to support the following goals:

  - Promote transportation fuel system infrastructure for electric, fuel-cell, and other emerging clean technologies that are accessible to the public where possible.
  - Promote potential efficiency gains from automated transportation systems and identify policy priorities to maximize sustainable outcomes from automated and connected vehicles (preferably ZEVs), including VMT reduction, coordination with transit, and shared mobility.

- Provide further information on the estimated GHG reductions for the following specific transportation targets, how the targets will be achieved, and guidance on the next steps if the targets are not achieved.

  - Quadruple the proportion of trips taken by foot by 2030 (from a baseline of the 2010–2012 California Household Travel Survey).
  - Strive for a nine-fold increase in the proportion of trips taken by bicycle by 2030 (from a baseline of the 2010–2012 California Household Travel Survey).
  - Strive, in passenger rail hubs, for a transit mode share of between 10 percent and 50 percent and for a walk and bike mode share of between 10 percent and 15 percent.

- Include a goal or action to develop guidelines for optimizing the application of compost, similar to those developed by the California Department of Food and Agriculture for optimizing fertilizer placement.

- Include a discussion of stormwater runoff from agricultural lands, residential landscapes, and other urban spaces and its corresponding impacts to water supplies.

- Identify stormwater as a potential piece of the solution for the State to meet its GHG reduction goals from the water sector.

  Stormwater is a valuable and local water resource. Meeting water sector GHG reduction goals of the Proposed Plan will be dependent on low-carbon water systems that are less energy intensive and utilize local-water supplies. Stormwater capture projects, which primarily use gravity to convey flows, provide one solution, resulting in an increased net reduction of water-related GHG emissions. The Proposed Plan and future versions of it should include and consider local stormwater capture as a critical part of California's water-supply portfolio.

- Provide actual total energy use and GHG production values for the water sector similar to those values shown for other sectors in Figure 1-3 on page 14 of the Proposed Plan. Show how the water sector compares with the other sectors in terms of energy usage and carbon release.

- Provide a comprehensive list of available funding sources for GHG reduction projects and programs organized by sector.

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