



FRANK SCOTTO
MAYOR

CITY OF TORRANCE

November 18, 2008

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

RE: City of Torrance Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the City of Torrance, thank you for the opportunity to comment on the California Air Resources Board's (CARB) Proposed Scoping Plan (Scoping Plan).

The City of Torrance commends CARB for its dedication and effort to develop the proposed Scoping Plan as a key step forward toward implementing AB 32 and creating a more sustainable energy economy.

The City of Torrance is proud of the work we have done already on reducing our City's greenhouse gas emissions (GHG emissions). The following outlines some of the action steps the City of Torrance has taken to reduce GHG emissions:

Fuel Efficiency

The City of Torrance is currently installing a new fuel management software program that will more closely monitor individual vehicle fuel economy. This system will capture and analyze fuel usage data for each vehicle in the fleet. This information will be linked directly to the City's fleet management software so that when a vehicle comes in for scheduled maintenance, the technician can evaluate vehicle fuel economy against established standards. Where variances are noted, corrective action can be taken to correct the problem.

Alternative Fuel Vehicles

The City of Torrance has in its fleet a number of vehicles that run on alternative fuels such as CNG, Propane and Electricity. These alternative fuels are constantly evaluated against one another so that when older vehicles are replaced staff can make informed decisions as to what fuel technology best suits the new replacement vehicle.

Biodiesel

Torrance has until very recently been using a B20 blend of biodiesel in its diesel fleet. Unfortunately, the State Water Resources Board recently passed regulations that prohibit the storage of biodiesel in underground fuel tanks (UGT). Until Underwriters Laboratories (UL) develops a fuel tank standard for bio fuels, the Water Board will not allow the City to store biodiesel in our UGTs. The City is currently exploring the possibility of installing an above ground fuel tank so that we can resume the use of biodiesel until the UGT issue is resolved.

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Hybrids

As the City replaces its light-duty fleet at the end of each vehicle's life cycle every effort is made to replace the vehicle with a hybrid, provided the vehicle's intended use is compatible with this technology.

Retrofitting Existing Diesel Fleet with Particulate Filters

The City has spent over \$400,000 thus far installing diesel particulate filters on existing diesel vehicles per CARB regulations. These devices have succeeded in reducing the City's particulate matter emissions by over 85%.

Torrance Transit

The City's Transit Department is currently on an extended plan to complete a full hybridization of our bus fleet of 52 vehicles. This greening effort will change out the current all-diesel fleet to gasoline-electric hybrid.

In addition, the Torrance Transit is involved with projects to add rapid bus service in a corridor from Redondo Beach to Long Beach and another project to add service on the Harbor Transit way. Both of these projects will attract discretionary riders (those that have a choice of driving a car). Community circulators are being developed to help reduce the number of local trips taken by cars.

Development and Conservation of Local Water Resources

The City is making significant reductions in imported water usage by developing more local water sources, increasing recycle water use and demand reduction through conservation initiatives that will have a significant impact on achieving an overall decrease in carbon emissions.

The use of additional recycled water supplies to replace potable imported water for industrial and landscape irrigation purposes is one method implemented by the City of Torrance. Our projection indicates that recycled supplies will comprise 25% of Torrance Municipal Water's (TMW's) total demand within 10 years.

Development of additional local potable water supply sources including new groundwater wells and expansion of groundwater desalter is another method being implemented. Collectively local water supply sources are projected to increase from 10% of TMW's resource mix to 35% within 5 years.

The City of Torrance is initiating accelerated conservation programs and initiatives which are projected to reduce overall potable water demand by 10% within the next 5 years.

Building Procedures

The City is reviewing building procedures to accommodate the new AB 32 regulations on energy efficiency in commercial and residential buildings.

Green Waste: Pilot Program Areas

The City has implemented a pilot program for the collection of green waste to leaves, grass, green plants, weeds, bush and garden trimmings, tree branches, wood chips and other green waste items. This program has been well received by our residents and will be expanded in the future.


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While the City of Torrance is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers to take into account the means necessary to achieve the goals. AB 32 requires that reductions in GHG emissions must achieve the maximum technologically feasible and cost effective reductions and for the CARB to "consider the cost-effectiveness of these regulations." (HSC §38560) In addition, we believe that the Scoping Plan appropriately allow the SB 375 process to develop regional transportation-related GHG targets. Implementations of the regional planning processes in SB 375 are new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal.

As both the state and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will become more burdensome for local governments. While local governments can influence development design to a certain extent, the reality is that developers will only build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The City of Torrance strongly encourages the CARB to consider these limitations as it moves forward with the Scoping Plan.

Thank you again for the opportunity to comment. This is a challenging task that is necessary to protect our environment, conserve our resources, and maintain a healthy lifestyle and to create new jobs and retain and grow the economy. The City of Torrance looks forward to working with the CARB in the future.

Sincerely,



Frank Scotto
Mayor

/maw

cc: Teresa Acosta, League of CA Cities



• City of Torrance •

• 3031 Torrance Boulevard, Torrance, California 90503 •

MAYOR AND CITY COUNCIL OFFICE - FAX COVER SHEET

Date: November 25, 2008

Pages: 4, including fax cover

PLEASE DELIVER TO:

Name: **Mary Nichols**
Chair, California Air Resources Board
FAX #: **916-322-3928**

Document(s) Transmittal:

Message: City of Torrance Comments on CARB Proposed Scoping Plan

FROM:

Sender: **Frank Scotto, Mayor, City of Torrance**

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If you have difficulty receiving any pages, please telephone this office immediately (310) 618-2801. Thank you.