Leon Freeman

From: Marc Caswell [mcaswell@climateresolve.org]
Sent: Monday, March 10, 2014 1:26 PM
To: Leon Freeman; DRP Community Climate Action Plan
Cc: Jonathan Parfrey
Subject: Climate Resolve Comments on Community Climate Action Plan (LA County)
Attachments: CR-comments-on-CCAP-final.pdf

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To Whom it May Concern:

Climate Resolve wishes to comment on the draft *Unincorporated Los Angeles County Community Climate Action Plan* (CCAP) *2020*. The region's premiere climate organization, Climate Resolve sees the County action plan as an excellent beginning to a regional conversation on how residents can reduce their contributions to the greenhouse effect and simultaneously improve their resiliency to anticipated climate impacts. Our comments focus on how the proposed policies will be measured and suggest key actions.

Please see our attached letter detailing our comments on this document, and thank you to the staff of the County of Los Angeles for their work and attention on this important document.

If you have any questions or seek additional clarification, please let us know.

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To: Leon Freeman, LA County Department of Regional Planning
From: Jonathan Parfrey and staff of Climate Resolve
cc: Supervisor Gloria Molina, Supervisor Mark Ridley-Thomas, Supervisor Zev Yaroslavsky, Supervisor Don Knabe, Supervisor Michael D. Antonovich, Howard Choy, Scott Wiles, Jonathan Fielding, Angelo Bellomo, Greg Jaquez, Lee Alexanderson, Youn Sim, Krista Kline
Date: March 10, 2014
Re: County of Los Angeles Community Climate Action Plan

Climate Resolve wishes to comment on the draft *Unincorporated Los Angeles County Community Climate Action Plan* (CCAP) *2020*. The region's premiere climate organization, Climate Resolve sees the County action plan as an excellent beginning to a regional conversation on how residents can reduce their contributions to the greenhouse effect and simultaneously improve their resiliency to anticipated climate impacts. Our comments focus on how the proposed policies will be measured and suggest key actions.

First, we applaud the County's GHG emissions reduction target of at least 11% below 2010 levels by 2020, which is consistent with AB32. We hope that this target will be achieved ahead of schedule and the county will pursue additional policies to reduce GHG emissions at even greater levels.

We also applaud that the CCAP is being included in the Air Quality Element of the General Plan update, but request that these policies be expanded to include other elements of the General Plan, including the Land Use Element, Mobility Element, Conservation and Natural Resources Element, and Safety Element. Since the decisions and policies proposed in the CCAP will have an immediate and direct impact on the topics discussed in the various elements of the General Plan, it is essential that these documents inform each other across the spectrum. These documents, together, will shape how land use and transportation projects are proposed, funded, and approved; the outreach and planning of these two important documents, which will shape the future of the County of Los Angeles, should be integrated more closely on each of the topics, instead of only the Air Quality Element.

Further, the public health and safety of residents of the County of Los Angeles it is essential this document be informed by – and inform – these key documents which will shape how the County of Los Angeles will care for its residents from a variety of public health aspects. While the General Plan does not currently include

a Public Health Element, the County adopted a "Healthy Design Ordinance" in 2013, which relates to many of the Land Use and Transportation Actions. The "Healthy Design Ordinance" should be reviewed and more measureable impacts related to health should be included throughout the CCAP.

As stated above, these policies and expected changes will impact the daily lives and public health of the residents – and we applaud the CCAP's clear and thoughtful discussion of this important topic (Sec. 1.5.1) and its attempt to make the larger, abstract concept of climate change relevant to the daily lives of residents. Below are more specific comments related to the Actions described in the CCAP.

1. Radiant Solar: It is unclear if the analysis of Action BE-3 "Solar Installations" refers solely to photovoltaic solar power, or includes solar radiant technology, as well. The initial costs of installation of solar radiant technology is much more affordable than the installation of photovoltaic cells, and can provide more immediate costs savings and GHG reductions. We encourage the County of Los Angeles to further study solar radiant technology and include a more in-depth analysis of this technology in the CCAP.

2. Cool Roofs: The Green Building and Energy Strategies could benefit from additional research and analysis on the potential impacts of the installation of "cool roof" technology. Currently, all new commercial construction in California is required to install cool roof technology; additionally, the City of Los Angeles recently passed an ordinance expanding that requirement to all new and major renovations (over 50% of roof replacement) of residential units. Much of Southern California's climate, and the County of Los Angeles, is a great opportunity to implement cool roof technology, which can lower cooling energy usage by 10-30% and reduce the Urban Heat Island Effect by lowering local air temperatures and ultimately protecting the health of residents.[1]

"Cool Roof" technology is affordable and provides immediate benefits to residents and building owners, once installed. We request that the CCAP include additional research and analysis on the creation of an incentive program for residents to install cool roofs similar to that implemented by the Los Angeles Department of Water and Power. These incentive programs help to reduce the cost of installation of cool roofs and improve energy efficiency of properties by reducing need for additional cooling mechanisms inside the structure and the surrounding structures. This low-cost program could provide additional energy-savings and compliment the other proposed Building and Energy Strategies proposed in the CCAP.

There are other shading implementation measures that also reduce Urban Heat Island Effect. These include shade barriers and trees. Los Angeles County could build cooling strategies into building requirements to ensure that its residents can become more resilient in the face of warmer

[1] H. Akbari, "Global Cooling: Increasing Solar Reflectance of Urban Areas to Offset CO2" *Climate Change* (2008).

temperatures.

3. LUT-1 Bicycle Programs and Supporting Facilities: One of the greatest benefits of investing in quality bicycle infrastructure is the potential for mode shift – especially for trips that are less than five miles. While there is a calculated rate of GHG for an average mile of car travel, the analysis of the potential GHG reduction related to bicycling should be calculated at a much higher rate, since tailpipe emissions are dramatically higher during the initial few minutes (and miles) of a car trip compared to the average trip.[2] Catalytic Convertors and other emissions-reducing technologies are required to reach an effective temperature to reduce emissions, which begins heating once an engine is started – this 'cold-start' phenomenon should be considered in the analysis of any bicycling/walking program. We request that the analysis more accurately reflect the potential GHG reductions given this information.

4. LUT-2 Pedestrian Network: Since walking trips tend to be less than three miles, the analysis of increased GHG emissions during the first few minutes (and miles) of a car trip be calculated when analyzing the impacts of LUT-2 in a manner similar to LUT-1. We request that the analysis more accurately reflect the potential GHG reductions given this information.

5. LUT-4 Travel Demand Management: The proposal to create incentives and marketing for increasing bicycle mode share is commendable -- but it important to note that such initiatives are only effective in conjunction with the creation of physical improvements to the street to support and encourage bicycling. Creating physically protected bicycling space can make the trip seem safe, convenient and easy – and marketing campaigns can only succeed with these types of investments. We would like to reiterate that these efforts cannot work without an investment in LUT-1 and strong political leadership to reevaluate how we distribute the space on the public streets and provide safe passage to people on bike.

6. LUT-5 Car-Sharing Program: With a growing interest in car-sharing, there are more and more companies who have been successfully created private car-sharing programs. There are additional policies, such as allowing developers and building owners to 'swap' required parking for spots to store car-sharing cars, which may allow for greater incentives for such programs. Other cities have created policies to allow the private car-sharing companies to store their vehicles on the street or in public garages for a fee, which has allowed for reduced operating costs for car-sharing companies (and additional revenue to public agencies), higher visibility, and easier access to the vehicles. It is our recommendation that the County of Los Angeles work with the private companies to determine what policies could encourage further growth of the market, rather than create and manage its own program.

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[2] Steven Burch, "Reducing Cold-Start Emissions by Catalytic Converter Thermal Management" *National Renewable Energy Laboratory* (1995).

7. LUT-7 Transportation Signal Synchronization Program: The expected GHG savings seems very high, given that pollution from modern private autos are extremely low, and will continue to decrease in the coming years thanks to hybrid vehicles and electric vehicles. We request that the County review the formula for calculating GHG savings for idling vehicles and ensure that it is aligned with today's average vehicle found on the road.

Further, we request that the County analyze and review how the potential for increased speed of motor vehicle traffic impact bicycling and pedestrian improvements, as described in LUT-1 and LUT-2. Any financial savings for increased motor vehicle speeds should be weighed against the public funds responding to the inevitable increase in traffic-related injuries and deaths caused by increased motor vehicle speeds.[3]

8. LUT-11 Sustainable Pavements: Beyond the maintenance of existing roads and recycling materials, we request that the County analyze and review the use of permeable paving and "cool pavement" materials for further environmental benefits. Permeable paving can allow for additional groundwater retention and reduce waste runoff through sewer systems, improving the water quality of rivers and the ocean. Cool pavement materials can improve the energy-saving and public health benefits similarly seen with cool roofs by reducing the Urban Heat Island Effect. Wide use of cool pavements improves air quality by decreasing urban air temperatures, slowing the formation of harmful ozone, also known as smog. Cool pavement technology may also reduce repair needs, since the materials temperature will fluctuate less, reducing pavement deformities and defects. Lastly, a higher albedo material can also help reduce the need for lighting at night, lowering the energy needed to light the street, reducing GHG and increasing financial savings.[4]

9. Land Use & Transportation, additional: We request the County also review the potential environmental improvements by removing requirements for creating additional parking for new and renovated construction. By eliminating the "Mandatory Parking Minimum" requirements, the County can help reduce dependence on automobile trips and encourage alternative modes of transportation including transit. Removing this burden can allow for more flexibility for developers to determine how to use their property, provide more cost-effective and environmentally-friendly developments and improve the bicycling and walking environment.[5]

Some cities in the United States have not only removed "Mandatory Parking Minimum" requirements, but gone a step further, creating guidelines limiting the number of parking spots allowed by right in new developments. While developers could apply for variances to go above the maximum, they would be required to demonstrate an over-riding community benefit or need for

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[3] Kathleen McCabe, "Community Speed Reduction and Public Health: A Technical Report" *Health Resources in Action*, (2013).
[4] Melvin Pomerantz, "Cooler reflective pavements give benefits beyond energy savings: durability and illumination," *ACEEE 2000 Summer Study on Energy Efficiency in Buildings Vol. 8, Edition 20*, (2000): 293-304.
[5] Coalition for Smarter Growth, "Leaving the 1950's Behind." via web.

such variances.

We request that the County of Los Angeles evaluate the undue burden on developers and consider not only eliminating the parking minimums, but imposing a parking maximum, as some cities have done as well.

10. Land Use and Transportation, Funding: Funding related to Strategies LUT-1, 2, & 7 should include the costs associated with the costs of emergency response, hospitalization, and general public health impacts related to injuries caused by motor vehicle collisions. Studies in other cities have estimated the cost of each pedestrian injury costs the city nearly $100,000 for investigation, emergency response, and hospitalization.[6] The safety improvements for bicyclists and pedestrians (LUT-1 & 2) should be amplified to show the increased savings to the County, while the increased speed of motor vehicles (LUT-7) should count against any estimated savings, since it would likely exacerbate injuries to the public. We request these potential costs be included in the analysis of funding related to Strategies LUT-1, LUT-2, and LUT-7.

11. Water Supply: There are other ways to integrate the CCAP into the General Plan. For example, in the General Plan's element on Conservation and Natural Resources, local water supply is discussed. A recent study found that diminishing snowpack, higher rates of evaporation and changes in soil hydrology are all likely outcomes from climate change, which will make imported water much riskier and elevate the importance of the county's proposed local water supply goals.[7] We believe a further review and analysis of water supply and security and conservation should be included in the CCAP.

On behalf of the residents of the Los Angeles region, we thank you for your leadership and dedication to this project. We hope that our comments can help inform and improve the Community Climate Action Plan, and look forward to seeing the additional analysis and research we have requested. We are happy to answer any additional questions or provide comment on any of the preceding comments or any future versions of this document.

Sincerely,

Jonathan Parfrey
Executive Director
Climate Resolve

[6] RA Dicker, "Cost-Driven Injury Prevention: Creating An Innovative Plan To Save Lives With Limited Resources" *J Trauma* Edition 70 (4) (2011).
[7] Alex Hall, "Mid-Century Warming in the Los Angeles Region" (2012).