

From: [Elida Luna](#)
To: [Iris Chi](#); [Thuy Hua](#)
Cc: [Rafael Andrade](#); [Elida Luna](#); [Edward Rojas](#); [Connie Chung](#)
Subject: FW: Comments from ATC re CAP
Date: Tuesday, November 14, 2023 5:03:36 PM
Attachments: [ATC comments submitted Nov 14 2023.pdf](#)

Please see attached.

ELIDA LUNA (she/her/hers)

COMMISSION SECRETARY, Operations & Major Projects (OMP)

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Tuesday, November 14, 2023 5:01 PM
To: Elida Luna <ELuna@planning.lacounty.gov>
Subject: Comments from ATC re CAP

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Luna;

Can you please distribute a copy of the attached letter to each Commissioners in advance of the RPC meeting scheduled for tomorrow?

Thank you very much for your time and consideration.

Sincerely;

Jacqueline Ayer

Correspondence Secretary



November 14, 2023

Honorable Michael R. Hastings, Chair
Honorable Pam O'Connor, Vice Chair
Honorable Yolanda Duarte-White, Commissioner
Honorable David W. Louie, Commissioner
Honorable Elvin W. Moon, Commissioner
Los Angeles County Regional Planning Commission
320 W. Temple Street
Los Angeles, CA 90012
Electronic transmission of two 2 pages sent c/o
Commission Secretary Ms. Elida Luna at
commission@planning.lacounty.gov

Reference: Agenda Item #7 of the Regional Planning Commission Hearing Scheduled for November 15, 2023 Pertaining to the Draft Climate Action Plan.

Dear Chair Hastings and Commissioners;

With this letter, the Acton Town Council seeks to memorialize specific issues pertaining to the proposed Climate Action Plan ("CAP") that were resolved in a recent discussion with planning staff; please accept these comments into the CAP evidentiary record.

CAP Provisions That Call For The Phase Out And Elimination Of Off Road Engines:

The numerous provisions set forth in the CAP that address "off road" equipment/devices and seek their phase out and elimination are not intended to target emergency generators. These "off road" equipment provisions are collected under "Strategy 4" pertaining to the decarbonization of transportation uses; accordingly, implementation of the proposed CAP will not result in the elimination of critical emergency generators that rural residents are frequently forced to rely on when electrical service is terminated due to inadequacies in the local electrical distribution system.

CAP Provisions That Call For The Decarbonization Of Applicable New Buildings

The decarbonization ordinance that will be developed to implement Action E 2.1 of the CAP will establish thresholds of applicability that are based on climate, geography, infrastructure, and sole-source dependency challenges that rural communities face; these applicability thresholds will determine whether, and to what extent, new development will be required to be fully decarbonized.

CAP Provisions that Call for the Decarbonization of Existing Buildings

Action E 1.1 requires the development of building standards for existing buildings and calls for the development of "reach codes" that will apply to major retrofits and renovations. The building standards developed pursuant to Action E 1.1 will not be "one size fits all" and will instead be adapted to the many unique environments that exist in unincorporated Los Angeles County and in particular, they will consider the climate, geography, infrastructure, and sole-source dependency challenges that rural communities face.

The Acton Town Council would also like to again recommend that the CAP be revised to incorporate a new action calling for an ordinance which prohibits the development of new commercial gas/diesel fueling stations. This recommendation is in line with Strategy 1 which requires the phase out of oil and gas extraction (page 3-15) and Strategy 4 which calls for all vehicles in unincorporated Los Angeles County to have zero carbon emissions (page 3-36); since the Board has already voted to prohibit new oil and gas extraction wells it seems the most logical "next step" would be to prohibit new gas/diesel fueling stations.

Thank you in advance for your time and consideration.

Sincerely;

/S/ Jacqueline Ayer

Correspondence Secretary

The Acton town Council

cc: The Association of Rural Town Councils [ourartc@gmail.com]
The Regional Planning Climate Action Team [climate@planning.lacounty.gov]

From: [DRP Public Comment](#)
To: [Thuy Hua](#); [Iris Chi](#)
Cc: [DRP Public Comment](#)
Subject: FW: Comment by the Acton Town Council at the Planning Commission Hearing
Date: Wednesday, November 15, 2023 9:24:43 AM

FYI

ELIDA LUNA (she/her/hers)

COMMISSION SECRETARY, Operations & Major Projects (OMP)

From: Acton Town Council <atc@actontowncouncil.org>
Sent: Wednesday, November 15, 2023 9:16 AM
To: [DRP Public Comment](#) <comment@planning.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>
Subject: Re: Comment by the Acton Town Council at the Planning Commission Hearing

CAUTION: External Email. Proceed Responsibly.

In the event that I am unable to provide comment due to technical difficulties, I have identified the comments that I plan to make below. Please accept these comments and read them if for some reason my audio function is not working.

ATC Comments:

The Acton Town Council has expressed concerns about Measure E5 requiring greywater system installations; this would be throughout the county including areas like Acton that are on septic and for which greywater systems are not particularly relevant because most Acton homes are on wells and have very little landscaping because water is so precious. In response, staff indicated that Measure E5 merely encourages gray water system development but does not require it; however, Action E5.1 states that dual waste piping is **required** in all new residential developments. We ask that this discrepancy be clarified.

The Acton Town Council has expressed concerns about Measure T5 and its safety impacts at sensitive intersections within the Community of Acton (such as at the intersection of Crown Valley Road and Sierra Highway). In response, staff assert that Measure T5 only applies to development in areas that are within one half mile of a major transit stop and that it therefore does not apply to the Crown Valley Road/Sierra Highway intersection. However, nothing in the CAP states that Measure T5 applies only to development within a half mile of a major transit stop so it seems that Measure T5 does apply to the intersection of Crown Valley Road and Sierra Highway and that it will have safety impacts. We ask that this clarify this

inconsistency before approving the CAP.

Finally, the Acton Town Council asks that a new action be added to Measure T6 that prohibits New Gasoline and Diesel Service Stations. The purpose of Measure T6 is to “Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales” and it is supposed to “Set targets for reducing total gasoline and diesel vehicle fuel sales”. However, Measure T6 does not include any Implementing Actions or Performance Objectives that address gasoline or diesel vehicle sales and it does not provide any policy or direction pertaining to gasoline and diesel vehicle sales. Prohibiting new gas stations is in line with Strategy 1 which requires the phase out of oil and gas extraction and Strategy 4 which calls for all vehicles in unincorporated Los Angeles County to have zero carbon emissions; since the Board has already voted to prohibit new oil and gas extraction wells it seems the most logical "next step" would be to prohibit new gas/diesel fueling stations.

On Wed, Nov 15, 2023 at 9:07 AM DRP Public Comment <comment@planning.lacounty.gov> wrote:

Thank you Jacqueline, you are confirmed.

Thank you,

PATRICIA FLORES MUNOZ

INTERMEDIATE TYPIST CLERK, Operations & Major Projects (OMP)

From: Acton Town Council <atc@actontowncouncil.org>

Sent: Wednesday, November 15, 2023 9:05 AM

To: DRP Public Comment <comment@planning.lacounty.gov>; Acton Town Council <atc@actontowncouncil.org>

Subject: Comment by the Acton Town Council at the Planning Commission Hearing

CAUTION: External Email. Proceed Responsibly.

I would like to provide comment on behalf of the Acton Town Council on the Climate Action Plan (Agenda Item #7). The ATC email address is atc@actontowncouncil.org
Jacqueline Ayer

From: [DRP Public Comment](#)
To: [DRP Public Comment](#); [Thuy Hua](#); [Iris Chi](#)
Subject: RE: Regional Planning Commission 11/15/2023_Item #7 - Project No. 2019-002015-(1-5)_ File # is 23-649
Date: Wednesday, November 15, 2023 9:25:21 AM

FYI

ELIDA LUNA (she/her/hers)

COMMISSION SECRETARY, Operations & Major Projects (OMP)

From: Ambar Rivera <ambar@cbeval.org>
Sent: Wednesday, November 15, 2023 9:01 AM
To: [DRP Public Comment](#) <comment@planning.lacounty.gov>
Subject: Regional Planning Commission 11/15/2023_Item #7 - Project No. 2019-002015-(1-5)_ File # is 23-649

CAUTION: External Email. Proceed Responsibly.

Hello,

I want to formally submit my public comment for **Item #7** - Project No. 2019-002015-(1-5)_ File # is 23-649 or the 2045 Climate Action Plan presented by the Regional Planning Commission on November 15, 2023.

Applicant: Ambar Rivera
ambar@cbeval.org
562.519.8498

Oil & Gas

- I urge the County to support the state Scoping Plan process to phase down oil refinery production, plan for the decommissioning and clean-up of fossil fuel infrastructure and set ambitious targets for 100% phase down of oil and gas operations by 2045.
- The PEIR states, in order to obtain carbon neutrality by 2045, a series of actions would need to occur, including, eliminating all oil and natural gas operations in the County.
- The PEIR expresses concern on impacts to surface or groundwater due to the closure of existing oil or gas operations. However, I urge the County that oil and gas operation phaseout is essential to support public health and the environment. I encourage the County to practice meaningful community engagement throughout oil or gas operations sunset strategy and incorporate proper remediation practices to ensure such phaseout is done ecologically sound and equitably. (Action ES 1:1)

- CCS has the potential to introduce new hazards into communities already burdened by harmful oil and gas infrastructure. The PEIR acknowledges that CCS technology is still in development at the state level and will require years or even decades to come to full fruition. The PEIR fails to include an analysis on potential health and environmental effects CCS has to communities included in the CAP. (Action ES 1.3)

Transportation

- I support the initiative to offer free transit for all. Free transit will support community health and improve air quality. (Action T 4.6)
- The PEIR suggests hydrogen fuel cell and natural gas as methods to reduce emissions. However, we urge the CAP to prioritize and commit to an electric and zero emission public transportation fleet. “Low emission”, “Biomethane” and “Biogas” are not ambitious enough technologies to reach the CAP’s target goals. No hydrogen. Electrification is cleaner, more efficient, and more technologically advanced than hydrogen transit, and further supports existing electric vehicle infrastructure. (Measure T4, T6)
- I encourage the county to prioritize electrification over alternative fuels. Low emission fueling sources, including hydrogen, biomethane, biogas, and natural gas could further delay electrification and potentially create health and environmental impacts for environmental justice communities. The streamlining of fueling infrastructure without proper and lengthy community engagement, health studies, and full CEQA analysis could lead to oversight of quality checks, assurances, safety requirements, and lack of proper training for contractors. (Action T 8.2, T 8.4)
- The PEIR highlights that the 2021 MATES Study conducted by SCAQMD found that diesel particulate matter is the main risk driver for air toxics cancer risk and that the goods movement and transportation corridors have the highest air toxics cancer risks. I urge the CAP to prioritize an electric and zero emission fleet for communities living along the 710 freeway, a major goods movement corridor.
- The PEIR flags that due to the lack of comprehensive timeline in completing the CAP measures and goals, there are potentially significant impacts such as the closure of major roadways or road closures. The traffic control plan attempts to reduce this impact however, it fails to include a plan for community members who rely on public transportation. We urge the CAP to

provide a comprehensive timeline, provide significant advance notice of any street closures, and coordinate with local bus routes and public transit services.

- The PEIR fails to properly analyze and provide assurances to the safety and efficiency of increased reliance on autonomous cars. CBE urges the County to reprioritize investment in mass electric public transit instead of autonomous mobility due to safety concerns and unintended impacts to low-income workers (Action T 4.1)

Building Decarbonization

- I support an equitable building decarbonization process. However, I strongly oppose the use of hydrogen in residential buildings.
- I urge the CAP to prioritize the electrification of buildings rather than rely on a mixture of biomethane with natural gas. (Measure E3)

thank you,

Ambar Rivera (she/they)

Staff Researcher

Communities for a Better Environment

6325 Pacific Blvd., Suite 300

Huntington Park, CA 90255

www.cbecal.org

From: [Rafael Andrade](#)
To: [Thuy Hua](#); [Iris Chi](#)
Cc: [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)
Subject: FW: LA County Climate Action Plan - need for an economic impact analysis
Date: Tuesday, November 14, 2023 2:02:21 PM

FYI

From: myvoice@oneclickpolitics.com <myvoice@oneclickpolitics.com>
Sent: Tuesday, November 14, 2023 1:57 PM
To: EDL-DRP BU-S Commission Services <commission@planning.lacounty.gov>
Subject: LA County Climate Action Plan - need for an economic impact analysis

CAUTION: External Email. Proceed Responsibly.

Re: LA County Climate Action Plan - need for an economic impact analysis

Dear LA County Planning Commission,

As California continues to be the leader in climate policies, we trust that any homes and jobs created in Los Angeles will also be sustainable and climate friendly. At the same time, if not done carefully, policies can also undermine our housing goals, increase our energy costs, and further curtail needed economic growth in Los Angeles. I am deeply concerned with Final Draft 2045 County Climate Action Plan (Draft CAP) and its impact on housing, jobs, mobility, and infrastructure. The proposal includes a density mandate of 300 jobs per acre for new projects. Of the county's 810 planning zones, only nine have more than 20 jobs per acre. This restriction will have a significant impact on small retailers, manufacturing facilities, entertainment venues and other sectors that drive our region's economic engine. The proposal also demands 90% of all water consumed – and 80% of agricultural irrigation water – be supplied exclusively by local water sources consisting of reclaimed water, graywater and potable recycled water by 2045. A vast majority of our water is imported - and this could have a significant impact on our housing and development. Although these are only considered aspirational, with the inclusion in the general plan, we have concerns that this will be far more binding than just "aspirational." It is clear that we must conduct a comprehensive Economic Impact Analysis to gain a better understanding of how this proposal may affect business and its potential implications to meeting the County Approved General Plan/Housing Element Regional Housing Needs Assessment goals. And we ask that Regional Planning and the LA County Board of Supervisors provide such a analysis.

Sincerely,
Brissa Sotelo
bsotelocd14@hotmail.com
1233 S. Bluff Rd. Montebello, CA 90640

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From: [DRP Public Comment](#)
To: [Thuy Hua](#); [Iris Chi](#)
Cc: [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)
Subject: FW: Agenda Item #7 (File #23-649) comment
Date: Wednesday, November 15, 2023 7:10:49 AM
Attachments: [image001.png](#)

FYI

From: Jennifer Ganata <jganata@cbeval.org>
Sent: Wednesday, November 15, 2023 12:27 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Agenda Item #7 (File #23-649) comment

CAUTION: External Email. Proceed Responsibly.

This comment is written by Jennifer Ganata, jennifer.ganata@cbeval.org, 3236838844, and I am not the applicant.

Communities for a Better Environment would like this commission to also refer to its comment letter that was submitted on July 18, 2022.

In addition, to those concerns that were outlined in the July 18, 2023 letter, CBE supports an equitable building decarbonization process. To achieve the 2045 CAP goals, we agree that the County must prioritize Equity in its implementation. We appreciate the definitions of equity that are on page 1-14, 2045 Climate Action Plan (Final Draft).

Equitable building decarbonization not only means developing new buildings that is built without gas lines and fossil fuels, but also ensuring that building decarbonization resources are targeted to existing buildings, particularly those in communities that are found in disadvantaged areas. In addition, building decarbonization resources should never be used to displace current residents. It is important that any program that is implementing building decarbonization does not inadvertently create financial hardship to existing residents. Costs for building decarbonization must not be passed on to tenants and the County should ensure that tenant protections are in place for residents of buildings that are getting building decarbonization retrofits. All of this must be integrated in to Measure E1: Decarbonize Existing Buildings (pg. 3-47 of the Final Draft).

Jennifer Ganata (she/they)
Senior Staff Attorney
Communities for a Better Environment
6325 Pacific Blvd. Ste 300
Huntington Park, CA 90255
www.cbeval.org

COMMUNITIES
FOR A BETTER
ENVIRONMENT
established 1978

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From: [Joanna Chen](#)
To: [DRP EPS Climate](#)
Cc: hollymitchell@bos.lacounty.gov
Subject: 2045 LA Dept of Regional Planning Climate Action Plan Comments
Date: Tuesday, November 14, 2023 6:59:38 PM

CAUTION: External Email. Proceed Responsibly.

Hello,

I am a concerned citizen residing in Culver City. I appreciate all of the work involved in producing this and the details in Appendix E, implementation. I am hoping the Planning Commission adopts this and provides enough support and finances, if applicable, to be meaningful and substantial in its results to make LA County and surrounding cities a wonderful, resilient, clean, healthy, accepting environment.

I am looking forward to following the county's progress in many of these actions, specifically the ones involved in micro-grids, vehicle to grid interconnection, and ensuring SCE utility company does the right thing for our communities in providing affordable, renewable energy for all residents. I have been looking at Culver City's 2045 General Plan and LA County's Sustainability Office (OurCounty) that was adopted in 2019. I am hoping all of these efforts have synergy and can be effective collectively in providing for the residents.

Please keep me up to date. I will be eagerly following the county's and Culver City's progress.

Joanna (Jojo) Chen
jojochen60@sbcglobal.net

From: [Huffman, Mandy](#)
To: [DRP EPS Climate](#)
Subject: Los Angeles County 2045 Climate Action Plan—Comment Letter
Date: Wednesday, November 15, 2023 10:53:06 AM
Attachments: [image002.png](#)
[DMS-#7083942-v2-Response Letter to LA County DRP re Final PEIR for Los Angeles County 2045 Climate Action Plan.PDF](#)

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Hua:

Attached please find Los Angeles County Sanitation Districts' response to the subject project.

Sincerely,

Mandy Huffman (*she/her/hers*)

Environmental Planner • Wastewater Planning
562-908-4288 ext. 2743
mandyhuffman@lacsds.org



[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#) | [YouTube](#)



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

November 15, 2023

Ref. DOC 7050265

VIA EMAIL climate@planning.lacounty.gov

Ms. Thuy Hua
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Hua:

Los Angeles County 2045 Climate Action Plan—Comment Letter

The Los Angeles County Sanitation Districts (Sanitation Districts) appreciates the opportunity to comment on the Los Angeles County (County) 2045 Climate Action Plan (2045 CAP). We thank you for considering and incorporating our previous comments submitted on July 6, 2022, and May 15, 2023 (copies enclosed). The Sanitation Districts continues to support the 2045 CAP but would like to provide the following additional comment below for your consideration:

- **Measure E5's performance objectives for Strategy 7: Conserve Water** aim to "Increase use of alternative water sources such that Unincorporated Los Angeles County demand is met by recycled water, graywater, or potable reuse: 25% by 2030, 50% by 2035, [and] 90% by 2045. Ensure that water demand for agricultural will be recycled or graywater: 30% by 2030, 50% by 2035, [and] 80% by 2045. Ensure that water demand for industrial will be recycled or graywater: 30% by 2030, 50% by 2035, [and] 80% by 2045." While the Sanitation Districts supports converting waste into resources like recycled water, the numeric goals for Measure E5 are unrealistic. According to the Integrated Regional Water Management Plan for Greater Los Angeles County (2017), approximately 110 million gallons per day (MGD) of recycled water made up less than 10% of our County's 1.5 million acre-feet of retail water demand. As stated in our May 15, 2023, comment letter, a partnership between the Metropolitan Water District of Southern California and the Sanitation Districts is expected to produce an additional 150 MGD for the region at the completion of the Pure Water Southern California (PWSC) project. Also, the Los Angeles Department of Water and Power's Operation NEXT Water Supply Program is expected to produce 170 MGD or more of recycled water upon completion. Many smaller "purple pipe" municipal reuse and indirect potable reuse projects are also in the planning stages. Accounting for existing production and these planned projects, the wastewater treatment agencies within the region expect to meet at most 50% of water demand for Los Angeles County with recycled water by 2045. We aren't aware what portion of this water will go to serve the needs of unincorporated areas within the County but given the distributed nature of projects and their overlap with unincorporated territory, it would be unlikely for them to feasibly serve 80% of unincorporated needs.

We again appreciate your leadership and your team's dedication to help update the County 2045 CAP. Please contact me at (562) 908-4288, extension 2701, or rtremblay@lacsd.org, if the Sanitation Districts can be of any assistance as you work toward implementation of the 2045 CAP.

Very truly yours,

Raymond L. Tremblay

Raymond L. Tremblay
Department Head
Facilities Planning

RT:JL:MNH:pb

Enclosures

cc: Steve Cole – Santa Clarita Valley Water Agency
Brad Coffey – Metropolitan Water District of Southern California



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
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(562) 699-7411 • www.lacsd.org

May 15, 2023

Ref. DOC 6875668

VIA ELECTRONIC MAIL: climate@planning.lacounty.gov

Ms. Thuy Hua
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Dear Ms. Hua:

Los Angeles County Revised Draft 2045 Climate Action Plan – Comment Letter

The Los Angeles County Sanitation Districts (Sanitation Districts) appreciates the opportunity to comment on the LA County Revised Draft 2045 Climate Action Plan (Revised Draft 2045 CAP). We thank you for considering and incorporating our previous comments submitted on July 6, 2022 (copy enclosed). The Sanitation Districts continues to support the Revised Draft 2045 CAP, however, would like to provide the following additional comments below for your consideration:

1. The Revised Draft 2045 CAP contains action measures, specifically Actions E5.2 and E5.3, related to the use of recycled water. The Sanitation Districts has a long history of providing affordable, high-quality recycled water to public and private water suppliers to help meet the water supply needs for more than five million people within the Sanitation Districts' service area. The recycled water is beneficially reused for industrial, commercial, and recreational applications; groundwater replenishment; agriculture; and the irrigation of parks, schools, golf courses, roadways, and nurseries. In addition to existing recycled water uses, the Sanitation Districts has partnered with the Metropolitan Water District of Southern California to explore the potential of a water purification project called Pure Water Southern California (formerly known as the Regional Recycled Water Program) at the Joint Water Pollution Control Plant, located in the City of Carson. At project completion, up to 150 million gallons per day (mgd) of water would be produced to recharge various regional groundwater basins and/or supplement regional water supply sources. We would appreciate if the Revised Draft 2045 CAP recognized these efforts.
2. The Sanitation Districts request that the County consider public agency projects covered by their own CAPs as in compliance with the Revised Draft 2045 CAP. Further, we request that a public agency be able to submit their own CAP in lieu of the checklist.

We again appreciate your leadership and your team's dedication to help update the Los Angeles County's 2045 CAP. Please contact me at (562) 908-4288, extension 2701, or rtremblay@lacsd.org, if the Sanitation Districts can be of any assistance as you work toward implementation of the Revised Draft 2045 CAP.

Very truly yours,

Raymond L. Tremblay

Raymond L. Tremblay
Department Head
Facilities Planning

RT:JL:MNH:pb

Enclosure

DOC 6920020

A Century of Service



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

July 6, 2022

Ms. Thuy Hua
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, California 90012

Dear Ms. Hua,

LA County Draft 2045 Climate Action Plan – Comment Letter

On behalf of the Los Angeles County Sanitation Districts (Sanitation Districts) we are pleased to support the LA County Draft 2045 Climate Action Plan (Draft 2045 CAP) and would like to provide the comments below for your consideration. The Sanitation Districts serve the wastewater and solid waste management needs of approximately 5.6 million residents in the Los Angeles Basin, Santa Clarita Valley, and Antelope Valley. We operate eleven water reclamation plants, two sanitary landfills, three materials recovery/transfer facilities, and two facilities that convert landfill gas into renewable energy. An important part of our mission is to convert waste into resources such as recycled water, energy, and recycled materials.

As stated in the Draft 2045 CAP, now, more than ever, climate change has become a real, urgent, and significant threat, with impacts being felt today in Los Angeles County and around the globe. The Draft 2045 CAP adapts Los Angeles County programs and services to reduce the unincorporated County areas' greenhouse gas (GHG) emissions and help limit global temperature increases. Further, the Draft 2045 sets forth Los Angeles County's path toward meeting the goals of the Paris Agreement and achieving carbon neutrality for unincorporated areas of the County. The document is comprehensive, thoughtful and reflects the diversity and complexity of Los Angeles County.

As mentioned above, the Sanitation Districts support the vision of the Draft 2045 CAP, however, we offer the following two comments for your consideration:

- 1) Many Sanitation Districts' facilities are included in the Draft 2045 CAP. To ensure potential emission reductions can be achieved and to avoid double-counting emissions or proposed reductions, an inventory boundary should be determined, and each individual agency should account for and report their own GHG activities within their organization's responsibilities and sphere of control. Similarly, emission estimation methods should reflect the same inventory boundary and rely on the best available information. The Sanitation Districts have performed such an inventory using site-specific data rather than population-based estimates as assumed in the Draft 2045 CAP. While both methods are acceptable, the publication of conflicting emission estimates can be confusing to the public and decision-makers. Due to these differences, we recommend that the Draft 2045 CAP include references to the Sanitation Districts' inventory and to state that Los Angeles County and the Sanitation Districts will work cooperatively to achieve carbon neutrality. A copy of our recently completed "2021 Greenhouse Gas Inventory Report" and a third-party verification of the report titled "Positive Verification Opinion for Greenhouse Gas Emissions and

Reductions for Emissions Year 2021” are attached. We would be happy to provide supporting data and information for our analysis, upon request.

- 2) The Draft 2045 CAP contains an action to capture all fugitive wastewater treatment process emissions and convert them to fuel. The Sanitation Districts would like to clarify whether Regional Planning meant to state that methane emissions from wastewater treatment processes should be captured and used as a vehicle fuel. GHG emission protocols assume nitrous oxide emissions are emitted from the wastewater treatment process and effluent discharge. If process nitrous oxide emissions cause Sanitation Districts’ facilities to become carbon positive, control technologies or process enhancements would be assessed. Regarding nitrous oxide emissions from wastewater effluent, it’s unlikely such a source could be controlled after being discharged from a treatment plant. In addition, fugitive emissions are defined by the EPA as “those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening,” so it’s unclear whether such a specific statement should be made about fugitive emissions. Therefore, we recommend this action be changed to reflect that methane produced during the wastewater treatment process is collected and converted into renewable energy or fuel. Please see our website (www.lacsd.org) under “Solid Waste Programs – Food Waste Recycling” and “JWPCP CNG Fueling Facility – Alternative Fuels” for further information about our activities to utilize digester gas from wastewater treatment from diverted processed organic waste to produce renewable natural gas that is available for use as a renewable low carbon vehicle fuel.

We know that updating Los Angeles County’s CAP was a significant undertaking and appreciate your leadership and all the people who have brought their dedication to help guide this effort. Please contact me at rtremblay@lacsd.org or at (562) 908-4288, extension 2701 if the Sanitation Districts can be of any assistance as you work toward implementation of the 2045 CAP.

Very truly yours,

Ray Tremblay
Raymond L. Tremblay
Department Head
Facilities Planning

RT:pb

Attachments

cc: climate@planning.lacounty.gov

From: [DRP Public Comment](#)
To: [DRP Public Comment](#); [Thuy Hua](#); [Iris Chi](#)
Subject: RE: Agenda Item #7 (File #23-649) comment
Date: Wednesday, November 15, 2023 10:31:43 AM

ELIDA LUNA (she/her/hers)

COMMISSION SECRETARY, Operations & Major Projects (OMP)

From: Laura Gracia <laura@cbeocal.org>
Sent: Wednesday, November 15, 2023 10:12 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Agenda Item #7 (File #23-649) comment

CAUTION: External Email. Proceed Responsibly.

Hello,

This comment is regarding agenda item number #7 (File #23-649). My name is Laura Gracia, email: laura@cbeocal.org, (323)363-2847. I am not the applicant.

I appreciate the opportunity to comment on the PEIR for the 2045 Climate Action Plan. Overall, the CAP and PEIR require a stronger analysis on environmental justice issues, potential impact to tenants, and climate impacts and adaptive capacity.

Firstly, we urge the County to support the state Scoping Plan process to **phase down oil refinery** production, plan for the decommissioning and clean-up of fossil fuel infrastructure, and set ambitious targets for 100% phase down of oil and gas operations by 2045, rather than the 80% stated in the CAP. The PEIR states, in order to obtain carbon neutrality by 2045, a series of actions would need to occur, including, **eliminating all oil and natural gas operations** in the County.

Secondly, We support the development of **resilience hubs** that are community-led, with trusted community-based organizations, through meaningful engagement. CBE participated in the development of the OurCounty Plan and resilience hubs incorporate the community needs of a cooling center with year-round services urgently needed. The PEIR states that there be at least one hub in each County district with a focus on vulnerable populations, we support the focus on environmental justice communities facing cumulative impacts from nearby industry which exacerbate climate impacts. The CAP should consider resilience hubs based on the concentration of people in vulnerable populations to ensure that the needs of those most vulnerable are being met. (Action ES 4.1)

Lastly, we urge the CAP **prioritize electric and zero emission** off-road and public transportation fleets- **no hydrogen**. The PEIR suggests hydrogen fuel cell and natural gas methods to reduce GHG emissions. However, low emission fueling sources, including hydrogen, biomethane, biogas, and natural gas could further delay electrification and potentially create health and environmental impacts for environmental justice communities. The streamlining of fueling infrastructure without proper and lengthy community

engagement, health studies, and full CEQA analysis could lead to oversight of quality checks, assurances, safety requirements, and lack of proper training for contractors. (Action T 8.2, T 8.4)

Thank you.

Laura Gracia-Santiago (she/her/they)

Climate Adaptation and Resilience

Enhancement (CARE) Coordinator

laura@cbecal.org | 323.363.2847

“Let us come together and move forward with hope as we defend and care for the Earth and its spirits.”- Berta Cáceres

From: [DRP Public Comment](#)
To: [Thuy Hua](#); [Iris Chi](#)
Cc: [Connie Chung](#); [Edward Rojas](#); [Elida Luna](#)
Subject: FW: Public comment for today's Planning Commission agenda item 7 (23-649)
Date: Wednesday, November 15, 2023 11:14:39 AM

FYI

From: Maya Iñigo-Anderson <Maya@cbeal.org>
Sent: Wednesday, November 15, 2023 10:57 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Public comment for today's Planning Commission agenda item 7 (23-649)

CAUTION: External Email. Proceed Responsibly.

Good morning. My name is Maya Inigo-Anderson and I am an Equity Transportation Fellow with Communities for a Better Environment which represents members in Southeast Los Angeles and Wilmington, along with a few other neighborhoods. I am a former Southgate resident and now live in the San Gabriel Valley. I would like to share some comments and concerns regarding the MAP.

First and foremost, I want to emphasize the importance of maintaining the character of local communities and avoid displacement. I am concerned about the potential displacement of current residents and community members through the proposed zoning changes will change the landscape of local communities. MAP intends to create the Life Science Park zone and the Artisan Production and Manufacturing zone, which has the capacity to create a dramatic change in the socioeconomic makeup of local communities. As someone who's family was previously subject to an unlawful eviction (which we fought and won) I am very aware how important it is to avoid displacement.

I would like to see more detail in the EIR on addressing the need for greenspace, especially in Southeast Los Angeles. In particular, it would be important to further address the need for greenspace in Walnut Park and Florence-Firestone.

Environmental justice communities, including Walnut Park, Florence-Firestone, East LA, West Athens and more, already experience harmful air pollution. As is, the MAP would increase emissions due to construction. This is concerning since it could impact residents' respiratory health. It would be important to avoid and contain construction-related pollution as much as possible. Construction should only occur when there is a significant benefit to the local community and negative impacts are avoided entirely or significantly minimized, especially the release of criteria pollutants, such as PM 2.5 and others harmful air pollutants.

I am further concerned that the MAP may not be subject to the CEQA process. Further analysis is recommended to evaluate impacts on sensitive receptors.

There are currently 41 documented hazardous material release sites in Florence-Firestone. Sites are "cleaned up" according to industry standards, rather than the standards of the local community.

I respectfully request that these concerns be addressed. Thank you.

From: [Ali Elhassan](#)
To: [DRP EPS Climate](#)
Cc: [Steve Cole](#); [Matt Dickens](#)
Subject: SCV Water comment on CAP 2045
Date: Wednesday, November 15, 2023 10:55:55 AM
Attachments: [Outlook-npvxc4b.png](#)
[LA Co Draft 2045 Climate Action Plan Comment Letter 111423.pdf](#)
Importance: High

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Hua:

Santa Clarita Valley Water Agency (SCV Water) thanks you for the opportunity to provide comments on the Final Draft of the Los Angeles County 2045 Climate Action Plan ("CAP") to consider in amendments to the Los Angeles County General Plan with the final CAP. While SCV Water supports the County's Climate Action Plan and its overall objectives, regarding Measure E5, there is a clear disconnect between the Performance Objectives and the measure's Implementing Actions. SCV Water requests that the County modify the Performance Objectives to better match the Implementing Actions by clarifying the need to coordinate and collaborate with water agencies to ensure the realistic and feasible use of recycled and gray water systems.

If you have any questions, please contact me at aelhassan@scvwa.org.

Best regards

Ali Elhassan, Ph.D, PE

Director of Water Resources
Santa Clarita Valley Water Agency
26501 Summit Circle
Santa Clarita, Ca 91350
Direct (661) 705-3941 ext. 1248
Cell (661) -714-6286
E-Mail: aelhassan@scvwa.org





November 14, 2023

Ms. Thuy Hua
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, California 90012

Dear Ms. Hua:

RE: LA County Draft 2045 Climate Action Plan – Comment Letter

Santa Clarita Valley Water Agency (SCVWA, Agency) appreciates the opportunity to comment on the LA County Revised Draft 2045 Climate Action Plan (Revised Draft 2045 CAP). The Agency has a service area of 195 square miles in Los Angeles and Ventura Counties that covers nearly the entire City of Santa Clarita and unincorporated portions of Los Angeles County. In addition, SCV Water serves LACWWD 36 whose service area includes the Hasley Canyon and the Val Verde communities in the Los Angeles County unincorporated area (see attached map).

The Agency continuously works to ensure the Santa Clarita Valley (Valley) has a reliable water supply. The Agency has planned for and invested over the years to develop a diverse water supply portfolio. This includes two principal sources of imported water, two sources of groundwater, recycled water, and banked water. The Agency's banking programs have stored a combined 145,000 acre-feet of water. This water is stored during years of adequate rainfall in northern California, the source of our imported State Water Project supply. This water is available for use in future dry or drought years. That diverse supply portfolio is reflected in our recently completed Urban Water Management Plan (UWMP), which projects water demand and supply through 2050. Existing supplies along with the development of recycled water and implementation of water use efficiency practices for residents and businesses in the Valley ensure a reliable water supply into the future (<https://yourscvwater.com/your-water/plans-and-reports/urban-water-management-plan>). The Agency, in collaboration with other entities including the Los Angeles County Sanitation District has developed and implemented Recycled Water Management Plans in 1993, 2002 and 2016. While recycled water currently represents a small percentage of our water supply, we have projects underway that seek to expand our capacity from 450 acre-feet per year (about 147 million gallons) to 10,000 acre-feet per year (more than 3 billion gallons).

SCVWA supports the vision of the Revised Draft 2045 CAP, however, would like to provide the following comments below for your consideration:

- The Revised Draft 2045 CAP contains action measures, specifically Measure E5, related to the use of recycled water. Draft Measure E5 *"Increase Use of Recycled Water and Graywater Systems"* includes a performance objective that *90% of the water demands of Unincorporated Los Angeles County must be met by recycled water, graywater, or potable reuse, and that 80% of water for agricultural irrigation or and industrial uses must be supplied exclusively by recycled or graywater by 2045"*. SCVWA supports and plans for the increasing use of recycled water but believes the performance objectives are unachievable

due to existing regulatory constraints. These constraints include requirements for potential instream flows in the Santa Clara River and reduced recycled water availability as a result of new laws governing water conservation.

- SCVWA requests the County consider SCVWA's previous plans including the Urban Water Management Plan, the Recycled Water Management Plan, and the Sustainability Plan, as well as the projects covered by these plans as in compliance with the Revised Draft 2045 CAP.
- Additionally, the Agency requests the County to consider the energy saving and greenhouse gas (GHG) reduction benefits achieved via implementation of SCVWA's Sustainability Plan (yourscvwater.com/sites/default/files/SCVWA/your-water/plans-and-reports/sustainability-plan/2023-SCV-Water-Draft-Sustainability-Plan.pdf). The Sustainability Plan, adopted by the SCV Water Board of Directors in July 2023, identifies several opportunities to achieve sustainable operations including those pertaining to energy efficiency and subsequent reductions in the Agency's greenhouse gas emissions. These include, but are not limited to:
 - Water Production, Operational Energy Efficiency & Utility Sourced Clean Energy Goals – specifically, SCV Water's Sustainability Plan highlights the benefits of SB 100, where all electricity in the State of California is expected to be produced from clean sources. Further, the Sustainability Plan aligns SCV Water's activities and measures to reduce Agency GHG emissions from a business as usual (BAU) forecast of 32,618 MT CO₂e to zero or near-zero emissions by 2045. These measures include, but are not limited to:
 - Scope 1 - Direct Combustion and Process Emission Reduction Measures
 - Scope 2 - Electric Consumption Reduction Measures
 - Scope 3 - Indirect Emission Reduction Measures
- With successful implementation of the Sustainability Plan, water service provided to SCV Water's customers, including those located in LA County unincorporated areas, will be supplied at or near net zero GHG emissions. These activities will support the CAP's objectives by reducing the energy intensity of water supplied to LA County unincorporated areas located in SCV Water's service area.
- While SCV Water supports the County's Climate Action Plan and its overall objectives, regarding Measure E5, there is a clear disconnect between the Performance Objectives and the measure's Implementing Actions. SCV Water requests that the County modify the Performance Objectives to better match the Implementing Actions by clarifying the need to coordinate and collaborate with water agencies to ensure the realistic and feasible use of recycled and gray water systems.

Sincerely,



Stephen L. Cole
Assistant General Manager
Santa Clarita Valley Water Agency

