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California Climate Action Registry
Air Resources Board
ICLEI

Attn: policy@climateregistry.org

Subject: City of Los Angeles Technical Comments on the Draft Local Government Operations GHG Emissions Protocol

Thank you for the opportunity to provide comments on the draft Local Government Operations Protocol (LGOP), developed jointly by the California Climate Action Registry, California Air Resources Board, and the ICLEI Cities for Climate Protection program. The City of Los Angeles Environmental Affairs Department participated in the technical work group to provide input during the development process, assisted by the City's Bureau of Sanitation on waste and wastewater issues, and we appreciate the opportunity to provide additional comments on the draft protocol at this time.

Several City of Los Angeles departments, including Environmental Affairs, Bureau of Sanitation, Los Angeles World Airports, and the Port of Los Angeles, contributed to the comments in this letter. We have provide both General and Specific comments to address different aspects of the LGOP. A few of the comments invoke scenarios where further discussion may be useful. City staff will gladly participate in any needed further discussions. Please don't hesitate to contact Gretchen Hardison at (213) 978-0852.

Sincerely,

Beth Jines
Assistant General Manager

CITY OF LOS ANGELES COMMENTS
ON THE
DRAFT LOCAL GOVERNMENT OPERATIONS PROTOCOL

General Comments

- The LGOP should acknowledge that local governments are fundamentally different from private corporations and other entities. Because of the type of services we provide, local government GHG emissions may increase as we provide additional and expanded services to our communities that are designed to result in overall reductions in GHG emissions. For example, as the City provides expanded recycling services to multi-family residential buildings (not typically our core responsibility), emissions from City services will likely increase. However, the service provided will likely result in higher community recycling rates, reducing emissions from the waste stream. While this protocol only addresses the emissions resulting from actions within a local government's direct control, the protocol should acknowledge the special circumstances and responsibilities of local government that might result in emission increases from specific services provided.

- Given the previous comment, the LGOP should anticipate an effective interface with the upcoming Community Protocol and establish opportunities for local government leadership across all sectors. Some reporting in all sectors of the LGOP should be encouraged, regardless of control, thereby establishing the connection and tradeoffs between the local government and community inventories.

- One of the most significant aspects of the LGOP is that it introduces methodologies for estimating emissions from landfills and wastewater treatment plants. As a follow-on to release of the LGOP, the convening parties (either individually or together) may wish to consider developing sector specific protocols, similar to the one created for the power/utility sector protocol. It is likely that reporters outside the local government operations area will look to the LGOP for guidance on these sources, and that may not be the desired intent. There was considerable controversy during the meeting about the validity of the assumptions about landfill calculations (with the implicit suggestion that the current proposal inflates emission estimations). See also specific comments under Chapter 9, Solid Waste Facilities.

Specific Comments

Chapter 3, general

- The LGOP appears to incentivize local governments to have a smaller appearing inventory by: reducing the quantity or quality of services (some of which, e.g. transit, might actually decrease overall GHG emissions), contracting out services, opting to report one control method versus another.

Chapter 3, page 18

- The City recommends continued consideration of whether the options of Operational versus Financial Control as borrowed from the Corporate Accounting and Reporting Standard, developed by the WBCSD/WRI best reflect local government scenarios. A combination approach, enhanced sector-based requirements, or other approach may prove to be more appropriate. In the interim, it would be valuable for the LGOP to include detailed examples on what operational control and financial control means in the local government context. This would complement one of the positive aspects of the LGOP, the provision of detailed examples on how to calculate direct and indirect emissions.

Chapter 8, page 75

- Specific guidance is provided in the power generation section as to how AB32 overlays the LGOP. Similar guidance was promised for users of the PUP and should be provided.

Chapter 7.1.2, page 66

- Are there any specific calculation methods for transportation fuels generated from biomass? If so, please note in the text.

Chapter 7.2, page 70

- Many municipal and private fleet operators are using liquefied natural gas (LNG) to power their vehicles. LNG is a cryogenic fuel and will stay at near constant, low temperature if the pressure is kept constant. Accordingly, venting of "boil-off" is needed. Unless the LNG storage facilities are equipped to capture this boil off, the methane released to the atmosphere via this source should be taken into consideration. How should this venting be addressed within the LGOP?

Chapter 9.3.1, No LFG Collection System, page 85

- We note that use of the IPCC FOD Model and default parameters to estimate fugitive methane emissions are not site specific, and could lead to inaccurate estimates of emissions.

Chapter 9.3.1, pages 87-89

- We recommend that operators of landfills that do not have LFG control systems also have the option to estimate their fugitive methane emissions using the data from measured methane surface emissions (flux, instantaneous or integrated surface measurements) and Equation 9.3 (on page 94), which may be modified to account for the absence of a LFG control system.

- Table 9.6 provides the default values for Landfill Cover Oxidation Value (OX) for two different types of cover, namely, soil and synthetic. Instead of having these types of cover, many landfills are now landscaped with trees and vegetation, which collectively provide a natural means for carbon sequestration. It is thus recommended that an OX value for this type of landscape at landfills should also be established.

Chapter 10, page 95

- In future updates, please consider including a standardized methodology to estimate the GHG emissions related to thermal treatment of biosolids, a by-product of wastewater

treatment process. This treatment is necessary and commonly in practice as part of regulatory requirements to ensure the final product is safe for beneficial land application.

- Please note that advanced secondary and tertiary treatments of wastewater require more energy consumption than those in primary treatment. However, it should be noted these advanced treatments result in higher effluent quality that enables it tp be used to reduce the local demand for water supply that is transported from remote sources.

Chapter 10, page 97

- One of the CWCCGs recommendations was to use emission factors developed by recognized industry leaders. These factors were presented in a letter (attached) to U.S.EPA Climate Change Division in January 2007 by National Association of Clean Water Agencies (NACWA). The emission factors recommended by NACWA are scientifically based and provide more accurate quantification of GHG gases. Please consider using these factors as standardized methodology in the LGOP.

Chapter 13, page 110

- The City feels the sector-by-sector reporting form and select sector-specific indicators work well for the purposes of the LGOP.

Chapter 13.2, page 115

- The City has concerns about the required reporting under the LGOP of rare-occurring sectors such as municipal utility, port, and airport. This could lead to apples-to-oranges comparisons among local governments. With the power utility in particular, an outside protocol (PUP) and reporting process are already well established for that sector and provide a more ideal place for apples-to-apples comparisons.

- The LGOP should specifically state that port and airport operations shall be defined as and limited to municipal operations for which the local government has operational control. The emissions of port and airport tenants should not be included in the LGOP GHG emissions inventory.

- Within the LGOP electronic reporting format, there should be separate "drop-in" categories (i.e. sector boxes) for ports and airports so those emissions can be viewed separately from other local government operations. This will allow for ports and airports to continue to separately inventory and verify GHG emissions for their operations and provide more effective year-over-year comparisons of their emissions.