



Los Angeles Unified School District

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VIA EMAIL [pbarthol@energy.state.ca.us]

Mr. Panama Bartholomy
Advisor to Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814

Re: **Los Angeles Unified School District ("LAUSD") Comments to the Land Use Subgroup of the Climate Action Team's ("LUSCAT") Submission to California Air Resources Board's ("CARB") Scoping Plan for AB 32**

Dear Mr. Bartholomy:

LAUSD submits the following comments on the LUSCAT's Submission to the CARB Scoping Plan (the "Submission"). We applaud the LUSCAT's efforts to address the impact of local land use planning on greenhouse gas ("GHG") emissions by suggesting new cross-cutting land use planning strategies that could be adopted by State agencies for climate change mitigation and adaptation.

LAUSD agrees with the Submission's Long Term Land Use Vision Principle #4 suggesting land use planning incentives to encourage GHG related local and regional planning. We believe that impending state budget cuts to education funding will reduce or eliminate many school districts' ability to finance GHG reduction efforts because a school district's reduced general funds will need to be devoted to the classroom and students. In short, school districts will require financial incentives to recognize and provide credit for existing efforts and encourage new initiatives. Any such financing or incentives should be additional to the funding the state is currently required to provide to school districts pursuant to Proposition 98.

We also support increased collaboration across all levels of government on methods to reduce GHG emissions through improved land use decision-making. Regional collaboratives are one way for local government agencies, including school districts, to standardize metrics, share cost-effective GHG reduction methods and best management practices, and communicate the urgency of climate change to the community.

The Submission addresses schools in two areas: 1) the siting of schools and 2) legislation regarding school funding mechanisms. In general, LAUSD supports the policy of siting schools in locations that are centrally located to existing neighborhoods, minimizes transportation distances and costs, encourages transit and pedestrian travel, preserves greenfields, and encourages joint use facilities. However, urban school districts like LAUSD are faced with very limited choices in potentially viable sites for schools.

LAUSD takes into account many different factors in selecting a school site and engages the community in the school selection process to select the most effective site for a new school. While LAUSD takes the factors raised by the Submission into account in siting a school, it cannot be limited by those criteria in ultimately selecting the site. We suggest that the Submission recognize the differences between an urban school district and a suburban or rural school district in describing the siting of new schools. We also suggest that, at least with respect to urban settings, the siting criteria remain voluntary.

In addition, LAUSD has received funding from the current High Performance Incentive Grant ("HPIG") Program for its high performance practices in new school construction through the Collaborative for High Performance Schools ("CHPS"). However, we believe that the success of the HPIG program and CHPS can be multiplied if greater funding is allocated to the HPIG program. The \$100 million currently budgeted is insufficient to fund the optimal level of high performance practices that will result in significant GHG emissions reductions. We suggest that LUSCAT recommend such an increase in funding in addition to climate or transportation based criteria.

Finally, the Submission briefly discusses potential legislative efforts to support the suggestions made by LUSCAT. LAUSD supports the review of school funding mechanisms to encourage the rebuilding and revitalization of schools in existing urban areas.

Thank you for providing an opportunity to comment on the Submission by LUSCAT.

Sincerely,



Andrew Cheung
Associate General Counsel

Cc: Mr. Charles M. Shulock, Director, Office of Climate Change, Air Resources Board