



PUBLIC WORKS

CITY OF PALO ALTO  
2501 Embarcadero Way  
Palo Alto, CA 94303  
650.329.2598

September 19, 2016

VIA ELECTRONIC SUBMISSION

California Air Resources Board  
Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions  
1001 I Street  
Sacramento, CA 95814

**Re: City of Palo Alto Comments on the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR §95100 et seq.)**

Dear California Air Resources Board,

The City of Palo Alto Regional Water Quality Control Plant (City of Palo Alto) appreciates the opportunity to comment on the proposed amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (17 CCR §95100 et seq.). In particular, the City of Palo Alto supports the effort in the proposed amendments to align this regulation with that of other jurisdictions with greenhouse gas (GHG) reporting programs. The City of Palo Alto recommends further action be taken within the proposed amendments to better align the California Air Resources Board's (CARB) GHG reporting regulation with that of the United States Environmental Protection Agency's (USEPA).

The City of Palo Alto treats wastewater collected from 220,000 residents of Palo Alto, Stanford University, Mountain View, Los Altos, Los Altos Hills, and the East Palo Alto Sanitary District. The City of Palo Alto treatment plant utilizes several stationary combustion sources that require facility reporting of GHG emissions under the existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions as well as reporting under the USEPA's Mandatory Greenhouse Gas Reporting regulation (40 CFR §98). Currently, the CARB GHG regulation utilizes global warming potentials and emission factors from 2009-2011 versions of the USEPA regulation; however, USEPA has since amended these values resulting in significantly different emission inventories for the same facility being reported to the two regulatory agencies. This discrepancy results in increased staff time for inventory compilation as well as confusion for those not directly involved in emission compilation and reporting such as elected officials, upper management, and interested public stakeholders.



[CityOfPaloAlto.org](http://CityOfPaloAlto.org)

The proposed amendments to the CARB regulation seek to align global warming potential multipliers with that of the USEPA regulation by incorporating as reference Table A-1 to Subpart A of the Title 40 Code of Federal Regulations Part 98, as published to the CFR on 12/11/14. However, the proposed amendments do not currently seek to adopt the most recent USEPA emission factors resulting in facilities, such as the City of Palo Alto, still having significantly different emission inventories reported to the two different regulatory agencies. City of Palo Alto recommends that CARB also align emission factor multipliers with that of the USEPA regulation by incorporating as reference Tables C-1 and C-2 to Subpart C of the Title 40 Code of Federal Regulations Part 98, as published to the CFR on 12/11/14.

Please do not hesitate to contact Samantha Engelage (Associate Engineer) at 650-329-2123, or by email ([Samantha.Engelage@CityofPaloAlto.org](mailto:Samantha.Engelage@CityofPaloAlto.org)) if you have any questions or require additional information concerning City of Palo Alto's comments.

Respectfully,



James S. Allen  
Regional Water Quality Control Plant Manager  
City of Palo Alto

ecc: Phil Bobel, Assistant Director Public Works  
Karin North, Watershed Protection Manager, City of Palo Alto  
Samantha Engelage, Associate Engineer, City of Palo Alto