

City of San Leandro

Civic Center, 835 E. 14th Street
San Leandro, California 94577



Office of the Mayor 510-577-3356
FAX 510-577-3340

October 1, 2008

Ms. Mary Nichols
Chair, California Air Resources Board (CARB)
Sacramento, CA 95814

RE: City of San Leandro's Comments on the CARB Scoping Plan

Dear Chairwoman Nichols:

We are pleased to see the California Air Resources Board working toward unifying a state-wide effort in addressing climate change. There has been a great need for guiding and supportive policy that connects all of our cities to the same goal of reducing greenhouse gas emissions. With this in mind, we would like to offer our suggestions to the Scoping Plan.

Technical and Financial Assistance Comments

We suggest that additional technical assistance be provided to local governments on their climate action work. Local governments will need guidance, specifically with emission inventories, emission reduction targets, and climate action planning and emission reduction measures. Taking these actions will be new for many and the process can be intimidating.

We see the need to have clarified local government protocols to encourage new jurisdictions to get involved and start taking action rather than get caught in the complexity of detailed inventories represented in the Scoping Plan. Perhaps a simple version could be directed toward those jurisdictions that have not begun to get involved. Helping local governments with regional communication/coordination efforts is also very important.

We also advocate the need to financially support cities and counties that are willing to take early action. In addition to financial help, it would be useful to state explicitly what measures have low upfront costs. For example, zoning for Transit Oriented Development, replacing fleets with car share programs, and purchasing solar with power purchasing agreements are a few measures that are worth explaining. Jurisdictions need to learn about and implement efficiency and reduction projects that have longer payback periods. Governments new to climate change work will need to push beyond the myth that these climate prevention actions always cost more money than "business as usual."



Water Comments

In the section regarding state water use, we see the need for greater elaboration. Considering that one-fifth of the state's electricity and a third of the state's non-power plant natural gas processing are associated with water, CARB should be doing more to educate cities on new technologies available for water treatment and reuse. Some actions include:

- Installing water recycling capabilities at water treatment plants to use reclaimed water within a city. This saves on energy otherwise used to transport water a longer distance. For example, in San Leandro we are providing 98 million gallons a year of reclaimed water to our golf courses.
- Installing a co-generation system at the water treatment plants. Co-generation is the process whereby methane gas, created by the treating process, is supplied to specially-designed generators to produce energy. In addition, the waste heat produced by the generators is used to replace the hot water currently produced by boilers for the treatment process. This system more efficiently uses methane energy by serving two purposes: electrical energy and heat; hence the term co-generation. The result is a significant reduction in the electrical energy purchased for a water treatment plant and a reduction of greenhouse gas emissions.
- Researching the potential use of algae to remove excess nutrients and other contaminants from municipal wastewater effluent. Algae are also able to bind other problem components in the wastewater effluent, such as copper, lead and nickel and some algae have the capacity to breakdown complex organic molecules including pharmaceutical drugs. Algae harvested from the scrubbers are fed to on-site anaerobic digesters that produce methane, which is burned to generate electricity that helps to power the treatment plant.
- Given the threat to future water availability, we recommend instructing jurisdictions on developing their local capacity of storing water. For example, the use of pervious pavement can aid in the development in filling underground aquifers.

Transportation Comments

We support CARB's inclusion of better community design and reducing vehicle miles travelled (VMT), but the proposed reduction target for land use and transportation of 2 million metric tons (MMT) of greenhouse gases is too low. The target should be at least 9-10 MMT.

The plan is timid in its approach to land use and transportation. Reducing automobile travel and creating more walkable and transit-oriented developments will reduce emissions. Also, there is no mandatory accounting for transportation. The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion.

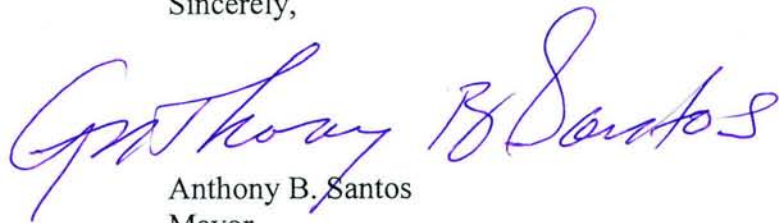
Employee commute should be required reporting rather than optional. Transportation composes the bulk of carbon emissions. In many instances, reductions in the employee commute can be more cost effective rather than investing in expensive technologies. We should not overlook the behaviors that contribute most to global warming. Every organization can take positive steps to reduce carbon emissions in the employee commute.

Our other suggestions include:

- The Scoping Plan should encourage innovative congestion-relief programs that can ease people's commutes while reducing emissions.
- Fund pedestrian and bicycle projects.
- CARB should set firm targets for regions and authorize regions and localities to choose from a suite of policy tools to achieve the targets, rather than adopting a one-size-fits-all approach.
- Support the aesthetic improvement of public transit facilities such as landscaping for sound barriers, increasing natural light, and improving the general appeal of using public transit to increase ridership.

We look forward to the development of the Scoping Plan as a far reaching influential document for all of California's cities.

Sincerely,



Anthony B. Santos
Mayor