TOWN of PORTOLA VALLEY
Town Hall: 765 Portola Road, Portola Valley, CA 94028 Tel: (650) 851-1700 Fax: (650) 851-4677

VIA WEB

November 19, 2008

Mary Nichols
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

RE: Town of Portola Valley Comments on Air Resources Board Proposed Scoping Plan

Dear Chair Nichols:

On behalf of the Town of Portola Valley (Town), thank you for the opportunity to comment on the California Air Resources Board's (ARB) Proposed Scoping Plan (Scoping Plan).

We are proud of the work we have done already on reducing our Town's greenhouse gas emissions (GHG emissions). The Town signed on to the Mayor's Climate Protection Agreement and adopted a resolution in support of California Assembly Bill 32. The Town has an active Climate Protection Task Force with sub-groups on Buildings, Energy Efficiency and Transportation, and Metrics. In the last year, the Town drafted a Sustainability Element for the General Plan including the goal to reduce our GHG emissions to 1990 levels by 2020. We are actively exploring the adoption of green building standards for new construction and a program to address energy efficiency in our existing building stock. We have adopted an Environmentally Preferable Purchasing Policy and increased our waste diversion to approximately 75 percent. We are also working with ICLEI to complete a GHG emissions inventory for our municipal operations that is inline with the Local Government Operations Protocol. We would like to make the following comments on specific goals in the Scoping Plan.

Voluntary Local Government 15% GHG Reduction

The Town does not disagree with the suggested voluntary 15 percent reduction in GHG emissions outlined in the Scoping Plan, but we are concerned about the funding sources for local actions needed to achieve these reductions.

Energy Efficiency

The Town is supportive of the Scoping Plan goal to expand and strengthen existing energy efficiency programs as well as building and appliance standards. We are supportive of the specific strategies outlined for existing buildings including

- Voluntary and mandatory whole-building retrofits for existing buildings
- Innovative financing to overcome first-cost and split incentives for energy efficiency, on-site, renewables, and high efficiency distributed generation

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Green Building

The Town is supportive of green and sustainable building practices in new and existing public, residential, and commercial buildings. We are supportive of the ability for local governments to voluntarily go above and beyond any existing state green building standards. AB 2939 (Hancock, 2008), which was vetoed by the Governor, would make such local actions less cumbersome. The ability for local governments to voluntarily go beyond the state green building standards is one more way for cities to lead in GHG reduction in the future. In addition, we are also supportive of the notion that cities that enact stronger local green building standards should be able to count the green building measures as additional GHG reductions.

While the Town of Portola Valley is generally supportive of a number of programs and policies outlined in the Scoping Plan, it is crucial for state policymakers take account for the means that will be needed to achieve the goals. AB 32 requires that reductions in GHG emissions must achieve the maximum technologically feasible and cost effective reductions and for the ARB to "consider the cost-effectiveness of these regulations." (HSC §38560) In addition, we believe that the Scoping Plan appropriately allow the SB 375 process to develop regional transportation-related GHG targets. Implementation of the regional planning processes in SB 375 are new and largely untested. The 5 MMT figure, while a place holder, nevertheless sets an appropriate benchmark that helps assure that the state can achieve its overall 2020 goal."

As both the state and local governments are faced with critical budget shortages, additional costs to heavily invest in GHG emission technologies in the next 2 to 3 years will become more burdensome for local governments. While local governments can influence development design to a certain extent, the reality is that developers will only build projects that will be purchased by willing customers and that are profitable. In order to effect the desired change, incentives must be provided to the development community and local agencies in order to encourage more development in areas where the reductions in GHG emissions will be the greatest. The Town of Portola Valley strongly encourages the ARB to consider these limitations as it moves forward with the Scoping Plan

Thank you again for the opportunity to comment. The Town of Portola Valley looks forward to working with the ARB in the future.

Sincerely,

Angela Howard

Angela Howard
Town Administrator

Cc: League of California Cities, 1400 K Street, Sacramento, CA 95864