



The Falls Church Village Preservation and Improvement Society

October 13, 2021

Mayor Tarter and Members of the City Council
City of Falls Church
300 Park Avenue
Falls Church, VA 22046

SUBJ: Improvements Needed to Draft Climate Change Plan

Dear Mayor Tarter and Members of Council:

The Board of the Village Preservation and Improvement Society (VPIS) appreciates the City's recent work to identify measures the City can take to reduce release of greenhouse gases and play our part in meeting national and international climate change goals. Although the current draft climate plan¹ is a good start, it needs significant improvement with respect to the measures it suggests and commitment to management actions that will assure that the suggested measures are implemented.

The VPIS Board wrote to you in May of this year² citing the critical need for the City to play a more active role in reducing the release of greenhouse gases that cause global warming. In that letter we asked that the City develop a plan of action for reducing greenhouse gases and we appreciate that the current draft plan is a step in that direction. As indicated below, however, we believe that the measures in the plan are not likely to meet the City's stated greenhouse gas reduction goal and need to be significantly more ambitious. **We urge the City to strengthen the measures proposed in the plan and provide a management framework that will assure their implementation.**

¹ https://fallschurch-va.granicus.com/MetaViewer.php?view_id=2&clip_id=1749&meta_id=106818

² https://www.vpis.org/wp-content/uploads/2021/06/VPIS_City-Climate-Change.pdf

In our May letter, we also recommended that the City revise its current greenhouse gas reduction goal to match the current United States national goal of achieving net zero carbon emissions by 2050. We also recommended that the City adopt the Metropolitan Washington Council of Governments goal, adopted in 2020, of a 50 percent reduction in greenhouse gases by 2030.

These goals are linked to the U.S. commitment to comply with the Paris Climate Agreement goal of limiting warming to 2 degrees C. We are disappointed that the current draft City plan is dedicated toward meeting only the lower goal of an 80 percent reduction in greenhouse gases by 2050 adopted in by the City 2017, prior to major new reports from the Intergovernmental Panel on Climate Change³ and the U.S. government⁴ highlighting the dramatically increasing risks and impacts associated with a changing climate.

For the City of Falls Church to proceed to develop and implement a plan based on a clearly inadequate goal will result in measures that are less ambitious than they need to be. The City will spend years doing too little to meet this challenge and, when this error is corrected in the future, the City will need to adopt ever more ambitious measures to make up the ground lost as a result of too low targets in this proposed plan. **We strongly urge you to adopt 2030 and 2050 goals that align the City with the national and international goals for reducing greenhouse gases and to provide for active implementation of measures by the City to help achieve those goals.**

Policy and Program Issues with the Draft Plan

In addition to revising the draft City climate change plan to align it with U.S. and International goals, several additional improvements are needed.

- 1. Address Greenhouse Gas Reductions from City Operations:** The draft plan does not address measures to reduce greenhouse gas associated with the operation of City government, including government buildings, schools, and other operations. Although City government is a source of a small part of the total greenhouse gas emissions from the community, it is critical that the City government play a leadership role in meeting its adopted climate change goals. City government reductions of greenhouse gases should be addressed within the larger, City-wide plan.

³ <https://www.ipcc.ch/report/ar6/wg1/>

⁴ <https://nca2018.globalchange.gov/>

- 2. Define Measures that Achieve Goals:** The draft plan refers to measures that will be implemented by state or national governments resulting in greenhouse gas reductions in Falls Church and measures that the City should implement to complement those measures, but it does not indicate that the combination of these measures will meet City goals or what part of the goal will be met by local actions vs. regional, state or national actions. The draft plan should more clearly account for expected greenhouse gas reductions resulting from actions by different governments, especially City government.
- 3. Account for More Ambitious State and National Measures:** Major new measures to reduce greenhouse gases are nearing enactment at the national level and these measures should be accounted for in the City's plan as they are enacted. The draft City plan should anticipate and clearly account for the greenhouse reduction impact of these measures in Falls Church and should adapt City measures to align with new national measures so that the combined effect is achieving greenhouse gas reduction goals.
- 4. Increase Ambition of City Actions:** In general, the actions proposed by the City in the draft plan do not appear sufficient to achieve greenhouse gas reduction goals in combination with actions by others. Some of the proposed actions now in the draft plan need to be more ambitious. In addition, some entirely new measures should be added.

For example, some needed changes to the proposed actions include:

- address commercial and residential buildings separately because of different management and investment capacity, giving attention to large, commercial buildings and special new large commercial buildings;
- in the transportation section, the activity of supporting the use of electric vehicles should be a separate goal within transportation including measures such as:
 - increase charging stations in special exception developments;
 - subsidize charging for low income or renters in existing buildings;
 - add charging stations to City property including schools;
 - add charging to selected on street parking owned by the City; and
 - provide incentives for addition of charging stations to private parking lots.

Examples of new measures that should be considered include:

- require solar activation of rooftops for special development projects;
- subsidize solar installation on existing parking lots and large building rooftops;

- adopt policies to protect existing tree canopy and provide for increase in tree canopy by 3% by 2030 from 2012 baseline; and
- subsidize or purchase City solar installation on existing parking lots and large building rooftops.

Where reductions from these actions are not fully reported by MWCOG, the City should invest in capacity to report this information.

- 5. Clarify Options for Renewable Power Purchase:** The draft plan should more clearly describe the potential for both the City and residents to purchase Renewable Energy Credits (RECs) to contribute toward greenhouse gas reduction goals and more clearly identify the cost of such purchases in terms of a given reduction in the City percentage reduction in greenhouse gas emissions (i.e., how much does an additional one percent of City greenhouse gas reduction cost in terms of annual RECs). This information would allow for assessment of the value of other City greenhouse gas reduction investments in comparison to purchase of RECs that reflect a generalized market price.

The draft plans should also identify options for collective purchase of renewable energy from organizations generating power at sites near the City, including solar power generation sites (for example, see: <https://neighborhoodsun.solar/>). This strategy allows Falls Church to overcome of the constraints it faces with respect to limited land area.

Management and Implementation Issues with the Draft Plan

It is important that the City climate change plan have the right goals and supporting measures, but it is also important that the measures in the plan be effectively implemented. Some key additions to the draft plan to assure effective implementation include:

- 1. Management Framework:** The draft plan should assign implementation of each measure to a City department and a lead staff person. A senior City leader (e.g., City Manager or Assistant City Manager) should manage a Task Force charged with implementing the plan.
- 2. Priority and Schedule for Measures:** The implementation of measures in the draft plan should be prioritized and scheduled with respect to start date, interim milestones, and end date if applicable. Schedules should result in timely implementation of measures needed to achieve greenhouse gas reduction goals.
- 3. Funding:** The plan should address funding of each measure in terms of amounts over time and whether funding is expected from state or federal grants, City general revenues, or City capital investments.
- 4. Reporting Progress:** The City should provide a report on implementation of the plan to the Council quarterly and more formally to the public at least annually.

5. **Public Engagement:** The City should work closely with the Environmental Sustainability Council, other boards and commissions, and the public in the development and implementation of the plan, including holding a hearing on the draft plan and holding public meetings to review annual progress reports.
6. **Commitment to Update:** The City should commit to reviewing and revising the plan on a specific schedule (e.g., once every five years) or in response to any major changes in conditions.

We appreciate that defining and implementing measures for the City to meet national and international greenhouse gas reduction goals is a big, new job. We ask for this major new commitment because:

- the science defining the serious risks of a warming planet is undeniable;
- meaningful measures to reduce greenhouse gases are within the City's control; and
- the City has the capacity to meet this critical challenge.

We look forward to working with you on this important issue.

Sincerely,

A rectangular box containing a handwritten signature in black ink that reads "Jeff Peterson".

Jeff Peterson

VPIS President

On behalf of the VPIS Board

Cc: Environmental Sustainability Council
Citizens Advisory Committee on Transportation
City Manager