

The Climate Action Alliance of the Valley (CAAV) offers the following comments on Harrisonburg's Draft Environmental Action Plan (EAP) Phase 1. We applaud the city's effort to focus on this important initiative. While the plan raises many possibilities in terms of actions, it does so in a way that in many instances is not specific or based on metrics. The draft seems to be more of a "plan to make a plan" without a clear path as to who makes decisions as to what actions might "make the final cut" and in some instances without a clear timetable. We hope that the final version will be strengthened to remove these weaknesses.

We also note that the plan does not include a recommendation or action item for the city to appoint a sustainability coordinator. Such a position would likely pay for itself by being able to generate grants and saving the city money through the various initiatives identified in the Phase I draft and in future actions. There has been an effort in the past based on a recommendation from Renew Rocktown. The prior effort did not result in the creation of a city position to drive coordinated and sustained efforts toward greater sustainability, but it led to the creation of the Environmental Performance Standards Advisory Committee (EPSAC) and, eventually, to this draft EAP. The city needs someone directly in charge of, and responsible for, implementing the final EAP and the city's sustainability efforts in general. This url from CAAV's website contains some relevant information about the prior effort, including details about a coordinator position: <https://climateactionallianceofthevalley.org/2013/03/09/how-about-a-harrisonburg-sustainability-coordinator/>.

Introduction

Paragraph 1 on p. 7 describes the EAP as a "road map for city leaders, staff, and community members to implement sustainability visions and principles" with possible foci for action plans. However, many if not most of the draft EAP's strategies begin with "Consider . . ." In the context of an "action plan," most if not all strategies should be more than merely aspirational and should preferably not be ideas that may (or may not) be considered, let alone acted upon. This leading paragraph, together with the Table of Contents, does not mark the EAP is a serious attempt at changing the status quo.

Similarly, paragraph 2 on p. 7 lists a number of aspects of sustainability but omits the important goal of greenhouse gas reduction, a surprising omission, given Goal 1. Although some goals and strategies, taken together, appear to include "policy changes" and "incentives," the details, particularly in Focus Area 1, fail to promote credible action plans.

Under "Scope of Plan," the phrase "improve the environment and sustainability" appears, again without clear definitions of either what would improve the environment or promote sustainability. Further, defining goal statements as "overarching statements describing the direction the community wants to go" and as "end states for each focus area [that] reflect the values of the community" appears reasonable until one considers what one would logically assume to be implementing strategies, only to find that the strategy is only to "consider" rather than doing something. Even though the goal statements are "qualitative [in] nature," we wish this action plan would include quantifiable goals and strategies using appropriate metrics; yet such specifics are largely absent. Worse, the "strategies and tasks may be implemented by city departments, private businesses, or community organizations." One has to assume that such strategies and tasks also may not be implemented—again, surprising within an "Action Plan." The good news is that implementation of strategies and tasks that the plan identifies does

not mean that they are the only possible implementation actions that could be taken. The bad news is that the plan's identified strategies and tasks seem optional.

Goal 1—Reduce Overall, Community-Wide Greenhouse Gas Emissions and the Intensity of Greenhouse Gases Emitted from Different Activities

Public and Private Sector

Goal 1 should be part of any environmental action plan (p. 8). However, it is the single overarching goal of the EAP. Since the plan is supposed to augment an “existing city plan . . . and proposed measures to accelerate advancements in sustainability,” it would be useful for the plan to include additional overarching goals that speak to the “critical pieces of achieving sustainability goals,” identified as “economic vitality, environmental protection, and health and well-being.” Although Goal 1 is worded strongly, using the action word “Reduce” GHG emissions, the two strategies for this goal are weakened by the hedge “consider.” If after considering possible actions, the city elects not to “complete a GHG Emissions Inventory” and/or set “targets for GHG Emission Reductions,” it would follow that the strategies of the 6 Focus Areas might be ignored.

The five goals of Focus Area 1 are good as far as they go (pp. 8-9). Goal 1 makes sense: the city cannot reduce greenhouse gas (GHG) emissions until it knows how much GHG it currently produces. Its implementing strategy 1.1, however, seems to duplicate the two strategies listed for the overarching goal. Accomplishing Focus Area 1's Goals 2, 3, and 4 in a substantive way should achieve some level of GHG reduction but in the absence of targets or objective measures, it's not clear how the city will be able to document its progress in reducing GHG emissions.

Goals 2, 3, and 4 appear to be tied to the city's energy use, whereas Goal 5 does not. Rather, it seems limited to the private sector. The public sector is defined to exclude the city's municipal electric utility (Harrisonburg Electric Commission [HEC]), even though its stakeholders clearly include the “public” and the “community”. Because it “operates independently from the City,” HEC seems to be considered a private entity. Given that the city cannot meaningfully accomplish Goals 2 through 5 without reducing energy generated from fossil fuels, implying the need for active participation of HEC, the language in the 2nd paragraph of Public and Private Sector suggesting that HEC will not participate in implementation of any of the 5 goals seems to obviate Goals 2 through 4 and consequently weaken the proposed action plan.

The third paragraph similarly appears undermine Goal 5. Rather than pointing out why the city cannot regulate the private sector without the authority to do so, the plan should acknowledge that the city can ask its elected representatives to introduce necessary enabling legislation for otherwise prohibited “incentives and suggestions.”

EAP Phases of Development

A proposed timeline for each phase would help Harrisonburg residents understand how soon the city might see significant reductions in its GHG emissions. The description of the draft characterizing Phase 1 as “lay[ing] the groundwork for future phases of EAP development and implementation of strategies towards environmental sustainability” is vague. Particularly in the absence of a timeline and by recommending consideration rather than action in most of the 14 strategies, one is left to guess what the city council's approval of Phase 1 would actually mean. For example, one cannot “set targets for GHG emissions reduction” (Strategy 1.2 on p.

11) if one does not first complete the GHG emissions inventory, but Strategy 1.1 on p. 11 says only to “consider” doing so.

Goal 1

The 1st paragraph (pp. 10-11) usefully describes GHG effects. This discussion would be more effective if it also described more fully the specific sources of GHG from human activity. Doing so would clarify why the EAP is needed and why the six focus areas and related strategies to reduce GHG are included. For example, major sources of fossil fuel-driven GHG are electricity production, transportation, and agriculture. In order to move forward on GHG emissions, Harrisonburg residents and businesses need to link these three major sources of GHG emissions and the changes production, transportation, and agriculture will need to make to reduce them.

Strategy 1.1 (p. 11) recommends considering joining the ICLEI. Not only should the city actually join ICLEI, it should identify other organizations, such as Resilient Virginia (<https://resilientvirginia.org/>) and the Institute for Local Self-Reliance or ILSR (<https://ilsr.org/>), through which it can educate itself about what other communities have done and obtain advice from those public employees who have implemented projects that might also work in Harrisonburg. There are other organizations with a wealth of experience and track records for making things happen. Rather than starting from scratch, identifying and adapting good ideas whose worth has been proven will save staff resources.

Focus Area 1—Buildings and Energy

Goal 1: The “Where We Are Now?” section would benefit by summarizing the city’s specific results to date and links to any reports. Otherwise, we can’t know our current starting point.

Goal 2: The “Where We Are Now?” section should include summaries of past actions and links to reports. Strategy 2.3 should include specifics of the cost analysis. Also, the listed tasks seem redundant. Given the language on p. 9 regarding HEC’s relationship to the city, Strategy 2.4 seems surprising, though actually determining the cost effectiveness of reducing “on-grid energy generation” is certainly needed to lower production of Harrisonburg GHG emissions. We hope the city can produce its own renewable energy, enable energy efficiency (EE) in municipal facilities, and incentivize EE among homeowners, landlords, and businesses. The city should do more than “consider” the various tasks listed. Instead, the plan should propose priorities for actually performing the tasks with clear timelines and objectives.

Further, given the financial interest both the city and HEC currently have in consuming more rather than less energy, the EAP needs to include a strategy and goals to deconstruct this interest. It is not clear, especially from discussions at recent HEC Commissioner meetings, that HEC views its mandate from the city to include reduction of GHG, increased use of renewable energy (RE) such as solar (or even support of its customers’ production of electricity with RE), or active support of greater energy efficiency measures. If the city is serious about reducing GHG in a significant way, it needs full participation of HEC. It is time to review existing policy and code defining the city’s relationship to HEC to ensure that it clearly authorizes HEC to participate fully in the strategies and goals of the EAP, particularly Focus Area 1. What was set up many years has worked well and HEC has carried out its mandate effectively and efficiently. But that mandate is inadequate in the 21st century, given the changes in technology that have made RE a viable alternative to fossil fuel generation and the pressing need for all communities to reduce their GHG. The city and HEC must figure out the best way to accomplish

this and make the necessary adjustments to policy and law. Doing so will provide HEC with the necessary direction to identify and make appropriate changes to its operations and, perhaps more importantly, to determine the requirements of its next contract with its energy provider. Negotiations for that contract will begin soon, if they haven't already done so. The current contract terms restrict HEC from incorporating more RE into its energy sources and does not fully or directly support the goal of reduction of GHG in the city.

Goal 3: The description and “Where We Are Now?” section should reference standards for Energy Use Intensity (EUI) or at least acknowledge the need to identify and employ such standards. This recommendation would apply to all 3 strategies.

Goal 5: Again, the “Where We Are Now?” section would benefit from summaries of past actions and links to any reports. Strategies 5.1 and 5.2 might be improved by studies of how other cities and towns have addressed such needs and identifying available grant money. For example, the city might look at Department of Energy grants such as Sol Smart and at CPACE. Missing from all 3 strategies are specific ways of promoting energy reduction renewable energy sources for existing residential buildings. The PACE program could one model. Working with HEC to develop alternative revenue sources (e.g., on-bill financing) might mitigate revenue losses from reduced energy consumption. These strategies’ “Responsible Party” needs to include HEC and define what is meant by “Community Organizations”; arguably, the city will need to partner with different public, non-profit, and private entities to accomplish different tasks for all 5 goals of this focus area. Strategy 5.3’s tasks are unclear. They should be clarified and strengthened. E.g., “publicizing the advantages of these properties” seems both disingenuous.

Here are a few links that provide ideas/actions/approaches. CAAV would be happy to provide additional links upon request.

Municipal Utility RFP: <https://reisingergooch.com/virginia-municipal-and-cooperative-utilities-issue-rfp-for-solar-storage-and-stand-alone-storage-resources/>

MN Community Solar: https://ilsr.org/minnesota-community-solar-saves-all-utility-customers-money/?utm_source=Energy+Self-Reliant+States&utm_campaign=e1bac19ccc-Energy+Self+Reliant+States+1+12+151+8+2015+COPY+01&utm_medium=email&utm_term=0_86e661ed1e-e1bac19ccc-82765733

Municipal & Other Utility Regulations: https://ilsr.org/in-op-ed-for-pioneer-press-john-farrell-explains-how-minnesotas-energy-regulators-fall-short/?utm_source=Energy+Self-Reliant+States&utm_campaign=e1bac19ccc-Energy+Self+Reliant+States+1+12+151+8+2015+COPY+01&utm_medium=email&utm_term=0_86e661ed1e-e1bac19ccc-82765733

Danville VA Municipal Utility’s Solar: <https://www.virginiamercury.com/2019/06/10/solar-is-powering-part-of-danvilles-resurgence/>

Moral Necessity of Acting: <https://www.baconsrebellion.com/wp/moral-hazard-and-sea-level-rise/>

Focus Area 2—Land Use and Green Space

We suggest that the city eliminate or reduce the amount of FREE PARKING. We need more affordable housing more than we need downtown parking lots. While we appreciate that readily available parking is good for business, free parking increases congestion by encouraging auto

traffic. Plus, revenue from parking lots brings far less than property taxes on buildings, making free parking punitive to property owners who actually improve their properties--i.e. Harrisonburg tax base would improve exponentially. Also, Harrisonburg should review ordinances on setbacks and zoning, making it possible for homeowners to build apartments in their yards to rent or house family members, thus increasing density.

Focus Area 3—Regional Food Systems

Goal 1. The language of Goal 1 could be strengthened by adding “Awareness about and Accessibility to” However, “Where are we now?” section seems inadequate. It’s difficult to believe the Business Loan Program is the only way the city currently supports local food access. Does the City really do nothing in support of the Farmers Market? Does the Health Department do nothing to support public education about nutrition that involves local food systems? If the Business Loan Program is the only thing the city has to show for this goal, at least add additional details about the state of this program, such as a) how much of the funds are allocated to local food businesses on average over the past few years; and b) how much of the funds (if any) go unaccounted for on average over the past few years. Finally, Goal 1 should adopt something like the following for measuring success: Reduce common barriers to community gardening and urban agriculture by 2025.

Goal 2. The language of Goal 2 is good. Please add the fact that Climate Action Alliance of the Valley pays for most composting program through public donations. Also consider adding the non-profit Soil Cycles collection service, if it is permissible to include\ activities not directly under City’s purview in this snapshot.

For all strategies, we suggest that you substitute more aggressive verbs than “consider.”

Strategy 1.1. For tasks under this strategy, can Parks and Rec offer educational programming on how to develop and manage community gardens, in addition to “community organizations”?

Strategy 1.2. The tasks are all good, but does the City have any means of encouraging businesses to accept SNAP? (If so, then add this to the strategy).

Strategy 2.1. Please add “adoption of low- carbon agricultural equipment and techniques” to the list of urban agricultural education topics.

Strategy 2.2. Please change the last task to “climate friendly food choices and lifestyles” instead of “food choices and climate friendly lifestyles.” You could something about “promote plastic-free and minimal waste food packaging among businesses and consumers.”

Strategy 2.3. On the last task, we suggest that you add “and provide additional funds to support expansion of the composting drop off and/or collection services, if funds are available.” (By 2030, we expect the city to have an opt-in compost pick public service for residential areas and businesses!)

Focus Area 4--Sustainable Transportation:

We commend Harrisonburg for including, and taking steps toward, sustainable transportation. Here are some additional suggestions.

Transportation includes our land use choices, our public transit, our municipal vehicles, and vehicles owned and operated by residents, guests, and businesses. Harrisonburg can increase ride sharing, biking, and walkable neighborhoods.

Goal 1 includes a review of electric buses for HDPT. If Harrisonburg aims to continue operating any non-bus vehicles, the city should consider electrification and alternative fuels for all vehicle classes. At a minimum, Harrisonburg should track the fuel use, fuel costs, and emissions from the city owned vehicles of school, pupil transport, police, shared sheriff, executive, refuse, street cleaning, and transit buses. All diesel equipment older than 2008 should be immediately retired due to their emissions. Other agencies and departments in the city should be involved beyond HDPT. Harrisonburg, if continuing to use diesel and petroleum imports, should consider assessing internal fees on the fuel to allow to build internal budget to move to \$.40 per gallon equivalent electric vehicles with available technology today or follow Roanoke and purchase used EV vehicles.

Goal 2 should meter the emissions from the oil-fired heating system (it's still 20 pounds per gallon) or buy additional biological waste oils rather than using once-used motor oil. Goal 3 should include reviews of additional routes, road diets, parking limitations, and lane restrictions on increased transit ridership. It might also explore whether citizens other than students will be served by the system.

Goal 6 Fuel efficiency could include city vehicles; the city should report what vehicles are in their inventory, their miles per gallon (fuelconomy.gov has all this info), and annual fuel use. Harrisonburg should present a budget amount equivalent to costs necessary to install bicycle and pedestrian facilities to city schools allowing access to sidewalks in the school areas. Harrisonburg can remove parking minimums. The city can promote bicycles and walking rather than city-owned vehicles for executive, public works, police, and school transportation. In addition to supporting the federal incentives, the city has authority to reduce the property tax for electric vehicles and for hybrid vehicles.

Goal 7 The city can install EV Chargers at government facilities rather than support them through new construction.

Focus Area 5—Waste Reduction and Recycling

A Pay-As-You Throw (PAYT) system should be implemented as soon as possible. PAYT increases recycling.

Harrisonburg has been able to maintain a plastics numbers 1 and 2 recycling stream while other municipalities have had to give them up along with other plastics. The Recycle Convenience Center and Recycling Mobile Unit drop-off programs appear to be well run and successful. Harrisonburg should investigate the cost and benefits of offering some evening hours for these programs.

Because schools are a significant gathering point, they might be popular drop-off locations and could be monitored by designated individuals or classes within each school. Visiting the landfill would be a valuable addition to the school curriculum, providing a meaningful way to learn about this resource burial and ways to divert and reduce this “waste” stream. These students, after all, will be the ones who suffer if Harrisonburg and other communities fail to significantly reduce GHG emissions.

Composting as a category should be under the recycling section rather than the reuse section.

With estimates of 20-50 percent of all municipal trash considered compostable, efforts to divert organic trash towards composting are worthwhile:

- Advertise curbside pickup services available through Black Bear Composting and Soil Cycles.
- Support backyard composting by having how-to info on the website and offering discounted bins through volume ordering, as is available through [GEOBINS](#).
- Develop and support a [master composters program](#), like that facilitated by the Institute for Local Self-Reliance, to advance local composting efforts.
- Support community composting by helping to coordinate space, communications, tools, and feedstock.
- Work with schools by identifying individuals/ classes in each school to host composting in their cafeterias as well as food-share programs for uneaten/ otherwise discarded foods.
- Plan for a "Compost Garden" in one of our public parks. The new one downtown would be especially appropriate to complement the existing drop-off bins. It might include demonstrations of backyard composting set-ups and some raised bed gardens amended with the finished compost. [Here](#) is one example.
- Add a compost drop-off option to the Recycle Convenience Center.
- Encourage use of an online platform for connecting organics waste streams with closest collectors/processors like <https://sharewaste.com/share-waste> or <https://ilsr.org/composting/map/>
- Facilitate the construction and oversight of community compost bins at each park and/or neighborhood as described in <https://www.inquirer.com/science/climate/philadelphia-compost-food-waste-20190619.html>

Harrisonburg, like every community, needs their own commercial-scale composting facility to divert organics including yard debris, pet wastes and compostable “plastics”/ service ware from its landfill.

The City’s [Alternatives for Unwanted Items](#) webpage is helpful for residents. It could be more user-friendly. Expanded information, images, a map with all the options, could improve its use-value. “Reuse” (non-landfill disposal) options change so often that this listing can be hard to maintain without using public input. Perhaps the city can crowdsource the reuse information or try a social media platform as a method of discovering new options that could be moved to the website after confirmation. E.g., H&M stores take all fabric/clothing for recycling if unsuitable for reuse (ripped, stained, worn-out). Goodwill does this as well. A textile (not just reusable clothing/ fabrics) drop-off at the Recycle Convenience Center would improve our recycling rate. Some businesses like Bring Your Own offer Terracycle drop-off bins for designated products like dental-related packaging and used up writing implements.

Allow for a volunteer-run "thrift store" at the landfill where reusable items being thrown away can be salvaged and sold to support whatever group is willing to staff it.

Focus Area 6—Water Resources

We hope that the city protects our watershed. In the future, we will be relying more on the South Branch of the Shenandoah River for our water supply. This river’s watershed would be impacted by the Atlantic Coast Pipeline if it is built on the current proposed route. Our concern for the

watershed is complicated by the unknowns with pipeline construction of the unusual pipe width, high pressure of the methane being transported, and difficult steep karst terrain. To protect our watershed, we need to focus on these threats now.

We also want to increase the city's tree canopy. This action not only improves our regional water quality but is one of the most effective ways to capture carbon and reduce the devastating effects of the climate crisis.