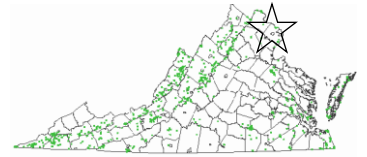




POTOMAC RIVER GROUP VIRGINIA CHAPTER

THE CITIES OF ALEXANDRIA & FALLS CHURCH, AND ARLINGTON
COUNTY



COMMENTS ON ARLINGTON'S COMMUNITY ENERGY PLAN IMPLEMENTATION FRAMEWORK SUBMITTED BY THE POTOMAC RIVER GROUP OF THE VIRGINIA CHAPTER OF THE SIERRA CLUB

We submit these comments on Arlington County's draft Community Energy Plan Implementation Framework (CEPIF) on behalf of more than 2,000 members of the Potomac River Group of the Virginia Chapter of the Sierra Club (Sierra Club).

We will keep our comments brief and focused on several major issues.

1. The planning process needs to be developed and explained.

The CEPIF is intended to play a major role in translating CEP goals into action. However, there is no explanation in the document, or anywhere else, of how the CEPIF fits with other needed plans, documents or structures that are part of high-level CEP implementation. It is possible that those questions are undecided, or that serious discussions of them have not yet occurred.

We recommend that the CEPIF be delayed until there is clarity about where it fits within a broader approach to implementing the CEP. The answers could influence the shape that the next draft of the CEPIF should take. For example, is there any intent to develop a strategic plan for the CEP? If not, the CEPIF may need to be strengthened to, at least partly, play those roles.

2. The CEPIF should provide a roadmap to carbon neutrality or clearly indicate how and when that will be done.

The Climate Change, Energy and Environment Commission (C2E2), the Energy Committee, EcoAction Arlington, and others already are on record suggesting that the CEPIF provide a substantive "roadmap" or "pathway" to carbon neutrality. We believe the issue of a substantive roadmap is linked closely to the issue of establishing the purpose of the CEPIF as part of a broader comprehensive planning process. If the CEPIF is intended to be a "tool" that will inform a broad strategic plan, that should be explained and the timeline for developing an appropriate plan should be established. If the CEPIF is intended to be a strategic document that charts a course toward carbon neutrality, then significant work remains to be done, as those elements are not apparent in the current draft.

Part of the reason for our concern is that we are now at a point in time -- about 1.5 years after adoption of greenhouse gas (GHG) reduction targets -- where many peer jurisdictions have developed strategic plans of one form or another, usually with significant public involvement.

3. Strategy prioritization requires a different approach.

We do not have confidence that the approach to strategy prioritization used in the draft CEPIF provides meaningful results. We recommend either leaving the strategies un-prioritized or using an approach to strategy prioritization that includes the following features, with respect to GHG reduction goals, with similar considerations for energy security goals:

- Considers the magnitude of GHG reduction expected from each strategy to the extent practical.
- Considers, to the extent practical, economic, technical and political feasibility.
- Does not include a consideration such as “is easy to implement in next two years” that biases toward status quo and low impact strategies.
- Does not include “promotes Arlington as a leader” as a major consideration.
- Assigns appropriate weight to equity, economic, public health, and other important benefits.
- Has been used successfully by other jurisdictions.

The Action Selection and Prioritization (ASAP) Tool developed by C40 is one free program that meets these criteria, although others may be available.

4. Plans and priorities should focus on the overarching goal of carbon neutrality.

Examples of high impact strategies that are not well-represented in the current draft CEPIF include:

a. Adopt an effective whole-of-government approach to implementation.

We share the view of C2E2, the Energy Committee, EcoAction Arlington and others that Arlington must act in a unified and effective way to implement the CEP. Nearly 1.5 years after adoption, we see little sign that this is happening, and some disturbing signs that other departments and bureaus see the CEP as a threat to established priorities, rather than an opportunity to advance shared goals. Our observations suggest that serious thought and effort need to be given to transitioning to a more effective governmental structure and approach, one that will achieve understanding, buy-in, participation and accountability from Arlington County Government as a whole.

This strategy should be listed as a high priority within the CEPIF. Efforts to advance this strategy should be underway at a high level already.

b. Include building electrification as a priority.

Building electrification or, more broadly, ending the burning of fossil fuels in buildings, is an essential and major component of achieving carbon neutrality. We were unable to find any reference to it in the CEPIF. There are countless references to “energy efficiency,” which is an important but different strategy that does not necessarily reduce or eliminate greenhouse gas

emissions. We continue to support energy efficiency. However, it has long been clear that, by itself, energy efficiency will not bring us close to the goal of carbon neutral buildings.

Electrification is as essential in buildings as it is in transportation. We recommend including building electrification strategies for each major building type (existing and new single family, multifamily and commercial) as priorities in the next draft.

c. Begin assessing options for reaching 100% renewable electricity as a priority.

By far the most impactful step the County can take would be to transition to renewable electricity community-wide. This would shift about 2.5 terawatt hours (TWh) per year of electricity to 100% renewable generation. This would be thousands of times more effective at reducing GHG emissions than most of the strategies currently shown as priorities. There are options for achieving this result at a very low cost, or possibly at a profit, per megawatt. The possibility of exploring one approach -- creating a Community Choice Aggregation (CCA) -- is mentioned in Strategy 25, with the possibility of beginning research into it in 2022 or later. In fact, extensive legal and technical research into that approach already has been delivered to the County. We recommend that the County engage a non-conflicted firm to assist in assessing options and moving forward as a priority with CCA or any other strategy that might achieve similar results.

5. Conclusion

We appreciate the opportunity to submit these comments. We would be happy to provide additional information on any aspect of our recommendations at any time. We look forward to staying involved as the CEPIF process unfolds.