



Sept. 19, 2023

Tim Stevens, Chair
Planning Commission
City of Falls Church
300 Park Ave.
Falls Church, VA 22046

Joseph Schiarizzi, Chair
Environmental Sustainability Council
City of Falls Church
300 Park Ave.
Falls Church, VA 22046

Subject: Recommended Improvements to the City of Falls Church Community Energy Action Plan (CEAP)

Dear Chair Stevens and Chair Schiarizzi:

We write in anticipation of briefings this week by City staff and consultants on the draft *Community Energy Action Plan (CEAP)* for the Planning Commission (PC) and Environmental Sustainability Council (ESC). We believe that the [draft CEAP](#) is an important and constructive step toward meeting the City of Falls Church's climate change goals. We would like to offer suggestions to improve the plan and we hope that the PC and ESC will discuss these proposed changes with City staff and consultants and agree to join us in urging the City Council to adopt the changes.

The [Falls Church Climate Action Network](#) (FCCAN) is made up of Falls Church City residents working to help the community meet the climate crisis. As you know, here in Falls Church, a changing climate is driving more extreme weather including damaging flooding and dangerous heat events. Strong and prompt actions are needed to respond to the climate crisis. The City has already taken a key first step by adopting goals for reducing the release of greenhouse gases that cause climate change by 2030 and adopting the new City of Falls Church [Government Operations Energy Action Plan](#).

In general, we believe that the draft CEAP describes sector-specific strategies and supporting actions that will significantly advance the City's effort to improve energy efficiency and reduce greenhouse gas emissions. **We recommend that the PC and ESC support adoption of the draft CEAP with the improvements recommended below.**

- 1. Adopt a Plan Designed to Accomplish the Adopted Climate Goal:** The City has adopted the regional goal of a 50% reduction below 2005 greenhouse gas emissions levels by 2030. The draft CEAP describes actions in specific sectors that will result in progress toward the 2030 goal but indicates that these steps have the potential to accomplish only about a 30 percent reduction. The City goal for 2050 is an 80 percent reduction but the draft CEAP identifies only a 65 percent potential reduction. The Plan refers to "Additional actions" needed to close the gap but does not describe what these actions are or even outline a future process for identifying steps that would close the gap in a timely manner. In addition, the draft CEAP cast doubt on the City commitment to its climate change goals by terming them "aspirational" (see page 8).

We recommend that the PC and ESC encourage the City to adopt a final CEAP that is designed to accomplish the City's adopted goals.

- The PC and ESC should encourage the City staff and consultant to review the sector-based strategies to **strengthen the commitment to key actions** (e.g., increase the targets for heat pumps installed, whole home efficiency improvements, and solar projects implemented).
- The PC and ESC should encourage the City staff and consultants to add a new action to "*Strategy 6: Improve measuring, tracking, and reporting of activity and emissions, and promote progress within the community*". The new action should commit the City to a **review and update of the 2023 CEAP in fall 2026**. An updated CEAP would provide an opportunity to review experience implementing the plan over the first three years and make needed adjustments and corrections. It is also an opportunity to account for most current state and federal government policies and add new actions that are recognized by the City as having value in helping close the gap between the current plan and adopted goals (e.g., development of a virtual power purchase agreement; see recommendation #3 below).
- The PC and ESC should encourage City staff to **remove language downgrading the City adopted climate change goals to merely "aspirational" status**.

2. Expand “Next Steps” Discussion with Information on Need for New Staff

The “Next Steps” section of the draft CEAP briefly refers to the implementation of the plan, including a brief reference to the need for two more staff positions to be “near term actionable” (see page 30).

The PC and ESC should encourage the City staff and consultants to expand the “Next Steps” section of the CEAP to describe in more detail the two requested new staff positions, including the importance of new staff to successful implementation of the plan.

The “Next Steps” section should also identify the need for the Council to fund new positions as a supplemental to the current FY 2024 budget. If the City waits to budget these positions in the coming FY 2025 budget, funding will not be approved until July of 2024 and new staff would not be onboard until the fall of 2024, a year after plan approval. This creates an unfortunate and unacceptable gap in plan implementation.

3. Revise CEAP to Explore Off-site and Multijurisdictional Power Purchase Agreements: A key tool for closing the significant gap between the emissions reduction goal and the sector specific strategies in the draft CEAP is to expand the use of Power Purchase Agreements (PPAs), including off-site (outside Falls Church City) projects. The draft CEAP includes a commitment to “Pursue community solar projects” (see Action 5.4) that is intended to:

“Connect the needs of residents who cannot set up rooftop solar systems themselves, including apartment dwellers and homeowners with extensive tree coverage, with commercial enterprises possessing ample space for onsite projects within the city.”

The draft CEAP also specifically dismisses the prospect of a community solar project outside the borders of the City, perhaps in cooperation with other nearby jurisdictions that would provide a helpful economy of scale (see page 26). Such a project has the potential to generate very significant greenhouse gas reductions are very low cost through the sale of electric power generated and could play a significant role in closing the gap in emissions reductions after 2030. The draft plan refers to issues with accounting for greenhouse gas reductions by the regional council of governments (see page 26) as an obstacle. The draft plan also says the City will try to address accounting issues but will not develop off-site projects “in the short-term.” No formal action for this work is included in the plan, even in the mid- or long-term.

The PC and ESC should encourage City staff and consultants to remove language dismissing off-site projects and amend Action 5.4 to include work to be done by the City to develop community solar projects both within the City and off-site.

4. Revise and Clarify Action to Promote Residential Density

Strategy 4 of the draft CEAP is to minimize the carbon impacts of new development. The second proposed action is to “Enact zoning changes to promote density.” The text states that one purpose of this strategy is “Increasing density can reduce the need for car travel and make walking, biking, and public transit a more viable solution to everyday errands and commuting.” The action to promote density suggests revising zoning to allow denser development in residential areas, including reducing residential zone lot sizes, allowing multiple units per lot, and allowing accessory dwelling units. Prior versions of the CEAP referred only to “Consider placement of any increased zoning density to leverage transportation options”.

As presently drafted, Action 4.2 proposes to evaluate increasing density throughout residential areas and gives no preference to density increases that are adjacent to or nearby walking destinations (e.g., services, shopping, restaurants). Increasing density in all residential areas, including areas where walking to destinations is unlikely, will increase population (i.e., make meeting greenhouse gas reduction goals harder) and increase vehicle miles travelled at a time when the City is working to reduce vehicle miles travelled.

The PC and ESC should encourage City staff and consultants to revise and clarify the proposed action related to residential density to describe a process of focusing increased residential density in specific areas where vehicle use is likely to be minimized (e.g., public transportation nodes, established service areas) rather than generally throughout all residential zones.

In addition, although this action is given one “\$” suggesting low cost, the recent experience in revision of transition zones in the City indicates that the proposed residential zoning changes would be controversial and require significant staff time.

5. Expedite Tracking of Key Implementation Metrics

Proposed Action 6.2 (i.e., “Incorporate sustainability-related elements into the property assessment database”) is an important mechanism to gather critical data about the rate of implementation of measures to implement the CEAP, including installation of solar power, heat pumps, and electric water heaters. This data will support interim adjustments to programs and policies based on reported progress. Unfortunately, the description of this action refers to its implementation in the “Medium Term”).

The PC and ESC should encourage City staff and consultants to revise the draft CEAP to expedite implementation of this key action (i.e., provide for implementation in the short term). Definitions of metrics should be included in the plan or developed soon.

- 6. Better Estimates of Costs, Effectiveness, and Timing:** The City and the consultants working on the energy plans have sought feedback from the public on views concerning the perceived value of a range of measures to address energy and climate issues. At the same time, the public reaction to potential actions or investments was not informed by meaningful information about the cost-effectiveness of the actions or the degree to which an action would reliably deliver projected emissions reductions over time.

The draft CEAP includes only vague and undefined information about the cost, effectiveness, and timing of proposed actions, expressed by 1, 2, or 3 icons (e.g., dollar signs, leaves) and statements to implement an action in the short/mid/long term. These terms are not defined in even very general, ballpark terms and do not provide a basis for public understanding of choices and tradeoffs or the decision-making needed to support future budget investment decisions.

The PC and ESC should encourage the City staff and consultants to define the icons and time periods with ranges, if not more precise data, especially for actions intended to be implemented in the short term.

- 7. Clarify References to Policies Not Addressed as Actions**

The draft plan speaks directly to specific, numbered actions under each strategy. But there are several suggested ideas in the text that are not expressed as numbered actions. Examples of these ideas include exchange of gas-powered appliances, expanding the City composting program, and restricting vehicle idling within the City. It is not clear how the City is proposing to proceed with these ideas and the plan should be clarified (i.e., these ideas should be either included as a formal action or removed, possibly to the Stakeholder Feedback section, on the grounds that the City will be implementing other, more effective actions).

The PC and ESC should encourage City staff and consultants to revise the draft CEAP to clarify whether the City is proposing to implement the ideas for actions mentioned in the plan that are not now presented as formal, numbered actions.

We look forward to working with you on this important issue and to identify and encourage other critically needed investments related to energy and climate change.

Sincerely,

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