

CLIMATE CHANGE, ENERGY AND ENVIRONMENT COMMISSION

**c/o Department of Environmental Services
2100 Clarendon Blvd., Suite 705
Arlington, VA 22201**

June 25, 2023

Honorable Libby Garvey, Chair
Arlington County Board
2100 Clarendon Blvd., Suite 300
Arlington, VA 22201

Re: FY 2025-2034 Capital Improvement Plan

Dear Chair Garvey,

The Climate Change, Energy and Environment Commission (C2E2) has carefully reviewed the proposed FY 2025-2034 Capital Improvement Plan and appreciates the County's plans for sizable investment in advancing climate and environmental priorities. Particularly notable are plans for expanding rooftop solar and EV charging infrastructure, improving energy efficiency, developing microgrids and resiliency hubs, improving and expanding stormwater management capabilities, investing in our natural resources, and expanding and improving bike and pedestrian infrastructure. These investments will improve energy efficiency, reduce greenhouse gas emissions, and ensure resiliency in the face of extreme weather and more intense storms.

The CIP could do a better job, however, in more directly linking the proposed investments to meeting climate and environmental targets. In particular, the CIP offers little details on how the proposed investments will phase out fossil fuels, reduce energy consumption, and meet the County's goal for carbon neutrality. Based on the Facilities presentation, progress is being made using the decarbonization tool in shifting from fossil gas HVAC systems to electric systems but no details on future plans beyond FY26 are identified. A publicly available inventory of all facilities to include energy use intensity with comparisons to standards and best practices for building type, and fuel sources as well as key information related to expected building renovations and replacement schedules for key building systems should be the foundation for planned investment over the next ten years. Furthermore, the CIP should include expected impact of investments on other climate and environmental goals such as reducing the urban heat island impact, expanding tree canopy coverage, improving capacity to handle intense storms and reduce flooding across the County and by watershed, and expanding and connecting bike lanes, particularly protected bike lanes.

C2E2 views the projections for transition to battery electric buses (BEBs) to be vastly inflated and should be adjusted to reflect a 1:1 replacement ratio. As the County has committed to transitioning to zero emissions buses, C2E2 sees no reason to include cost projections for replacement of CNG buses nor any justification for assuming a replacement ratio higher than 1:1 at this time. Currently ART has no BEBs in its fleet and thus no operational experience. As our [December letter](#) stated, Arlington will have

no difficulty replacing CNG buses with BEBs at a 1:1 replacement ratio if it chooses appropriate battery sizes and follows standard fleet management practices. Steady improvement in battery technology will quickly overcome any residual range issues during rare, extreme cold weather. CNG buses will also remain in the fleet beyond the CIP period and can cover more challenging routes if needed.

The inclusion of approximately \$75 million in added investment for extra buses, land acquisition and facilities indicates that the County has the wherewithal to fund transit expansion and other transportation projects to provide residents with alternatives to their cars to meet their transit needs. C2E2 has previously recommended in our letters on the [Transit Strategic Plan](#) and the [FY25 Budget](#) that the County explore how our existing transit structure can be enhanced by integration of microtransit and, working with APS, explore how ART and Metro can meet most of the transportation needs of middle and high school students. A study conducted over the next year would offer a framework for revamping our transit system to offer services that better match the transportation needs of the Community. In the meantime, some or all of these funds could be included later in the decade as a placeholder for such projects and be used to support other priorities such as additional land acquisition for parks and improvements to the County's aging nature centers.

C2E2 supports plans for a Resiliency Hub at Lubber Run Community Center and future projects for microgrids and resiliency hubs but questions whether tapping the Climate Action Fund to finance the Lubber Run project is the best use of these funds. This project will not advance Arlington's goal of reducing its greenhouse gas emissions and the inclusion of a fossil gas generator appears to be a step backwards. The Climate Action Fund should be dedicated to reducing GHGs by using these funds to assist households and building owners in improving energy efficiency, electrification, and rooftop solar where feasible to more directly address the underlying cause of the climate crisis. ***C2E2 recommends that the County seek other sources of funding for this resiliency hub.***

In addition, we recommend that the County consider expanding backup battery capability rather than installing a fossil gas generator at Lubber Run and consider shifting to battery backup when replacing diesel generators in other facilities. Battery storage would not only provide power in the event of a power outage but could play a role in maintaining grid reliability during periods of high demand, complementing proposed microgrid projects. The County should also continue to explore opportunities to incorporate geothermal systems, which have the potential for greater gains in energy efficiency and building resiliency, in County facilities.

C2E2 supports the general direction of the CIP for funding of the County's stormwater program, with a few suggested recommendations. Since 2019, the County has built a stormwater program with strong analytical capabilities, a clear watershed-based agenda for expansion of stormwater infrastructure (including green strategies), and significant funding for such improvements. This approach has yielded positive results, such as the underground detention vault at Cardinal School and the Ballston Wetland Park. To maintain this momentum in the program, it is important for the County to complete its standard feasibility analyses for the two watersheds most in need of remedial action – Spout Run and Lubber Run. These analyses should provide a sound technical rationale for remedial actions that will

best protect residents facing serious flooding risks in their homes, while also limiting stormwater flows that damage our streams, trees, and other environmental resources. In addition, it would be helpful for the County to develop tools to communicate with the public about how completion of specific stormwater projects provides the levels of protection sought by the County (i.e., its goal of protection against the 10-year storm at a minimum, with protection against the 100-year storm where possible.)

Thank you for the opportunity to share our thoughts on the proposed CIP.

Sincerely,

A handwritten signature in black ink that reads "Joan J. McIntyre". The signature is written in a cursive style with a large, stylized "J" and "M".

Joan McIntyre

Vice Chair, Climate Change, Energy and Environment Commission

CC: Mark Schwartz, County Manager

Bill Eger, Chief Climate Coordinator

Greg Emanuel, Director Environmental Services

Jane Rudolph, Director or Parks and Recreation Department