



March 3, 2021

Honorable Matt de Ferranti, Chair
Arlington County Board
Ellen M. Bozman Government Center
2100 Clarendon Blvd, Suite 300
Arlington, VA 22201

Re: Community Energy Plan Implementation Framework

Dear Chair de Ferranti:

The Forestry and Natural Resources Commission (FNRC) received a presentation on the Community Energy Plan Implementation Framework (CEPIF) at our January, 2021 meeting, and appreciates the opportunity to share the following comments.

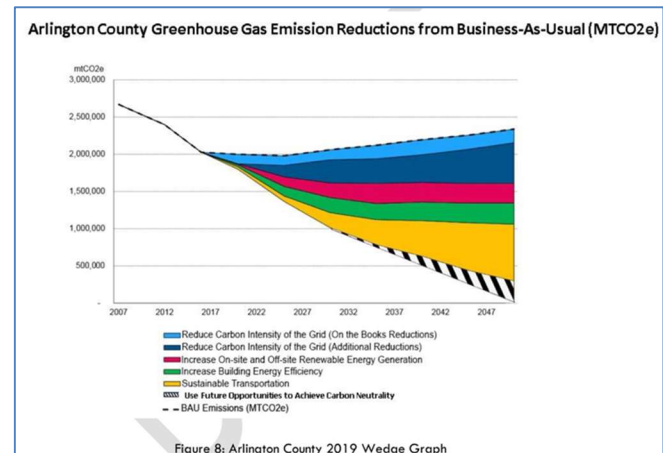
The FNRC is a strong supporter of Arlington's efforts to reduce greenhouse gas emissions, improve energy efficiency, and create a more sustainable and livable community.

However, the FNRC has identified the following five concerns with the CEPIF:

1) *A major opportunity is being missed by not including the tree canopy in formal calculations of Arlington's net emissions.*

As the Community Energy Plan describes, Arlington County has set an ambitious target of zero net emissions by 2050. The County shows those contributions in a so-called "wedge" chart (*Figure 8* in the Energy Plan and copied here), with each measure offering an individual wedge that, added together, adds up to the total emissions reductions.

But this approach is missing one crucial component—the natural environment and trees, in particular. As the Community Energy Plan states on page 22: "Arlington's trees currently store over 180,000 metric tons of carbon. Every year, an additional 8,700 tons of carbon is stored in trees as they grow. Gaining or losing tree canopy will [thus] affect...the ability to meet the County's 2050 Carbon Neutrality Goal."



It is crucial, therefore, to include the carbon capture gain (or loss from reductions in County tree canopy) in the “wedge” calculations. Yet, this vital approach is not one of the 63 strategies listed in the Draft Implementation Framework Strategies document. In fact, not a single one of the 63 strategies even includes the word “trees” (though Strategy #42: *reducing the urban heat island effect* does list trees as one tool for achieving the strategy).

2) Due diligence in contracts and power purchase agreements (PPAs) with Dominion and other utilities is necessary to ensure that the construction of proposed solar facilities does not result in the loss of forests or trees or have other deleterious environmental impacts.

The FNRC and other interested parties received inaccurate information regarding the land that is to be used for the installation of a solar farm in southern Virginia. We were led to believe that trees would not be cut down to install the solar arrays, which is clearly not the case since many acres of forested land is being clear cut as a result of the power purchase agreement with Dominion Power.

3) Arlington should reinforce its existing message that trees trump solar panels in residential communities.

The FNRC reiterates the long-held position, embodied in the first iteration of the Community Energy Plan, that trees provide an array of important benefits, including energy savings, and trees should not be cut down in order to put solar panels on rooftops. The County’s own calculations show that the benefits of the trees (reduced heat and energy bills because of the shade, carbon capture, stormwater management, cleaner air, mitigating heat island effect, etc.) outweigh the incremental increase in renewable power from a rooftop solar system made possible by removing the trees. The FNRC urges that this message be made more prominent in the County’s outreach to citizens about the CEP.

4) In the Community Energy Plan itself, Arlington should clearly commit to sharing space for multiple uses, including renewable energy production, stormwater control, and gardens.

As the Urban Forestry Commission wrote in a 2019 letter, there is no discussion in the plan of the tradeoffs of land use and renewable energy production. As was noted in the Public Spaces Master Plan, in a land-constrained community with a growing population there are important trade-offs in how all horizontal spaces are used. The UFC urges inclusion of the importance of sharing spaces for multiple uses, such as roof tops for gardens, storm water mitigation and solar panels on shade structures.

5) Also in the Energy Plan, Arlington should comprehensively consider equity and externalities of any renewable energy strategies to avoid simply transferring costs to other communities or ecosystems, as the UFC recommended in 2019.

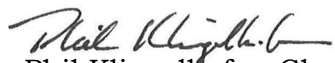
The issue of equity should not be limited to the boundaries of Arlington, especially given the recommendation that a significant amount of renewable energy is produced off-site. There needs to be some acknowledgement of the tradeoffs and externalities imposed on other communities when Arlington seeks to reach 100% renewable energy

by saddling other communities with solar arrays, windmills and transmission lines. As noted above, cutting down forests to build solar arrays highlights the issues of environmental degradation in pursuit of renewable energy. We object to an energy policy that makes us feel virtuous while imposing significant environmental damage elsewhere. A cost-benefit analysis of the loss of the myriad ecosystem services of existing trees and natural areas must be factored into the equation, if we are to have a true understanding of the implications of our policy decisions.

In summary, the Commission is concerned that narrow, short-term energy conservation goals could undermine overall long-term energy conservation and environmental objectives. The Commission also strongly recommends that trees play a larger role in the Implementation Framework, in particular including measurements of the carbon taken up or released by the County's urban forest in the formal calculations of the County's net greenhouse gas emissions. Finally, it is important to recognize that all of these choices have consequences and we need to more explicitly lay out the trade-offs inherent in our policy decisions. These factors should be more explicitly addressed in the CEP Implementation Framework.

Thank you for the opportunity to share our views.

Sincerely,



Phil Klingelhofer, Chair
Forestry and Natural Resources Commission

Cc: Members, Arlington County Board