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*Protecting and promoting the natural resources, rural economy,  
history and beauty of the Virginia Piedmont since 1972*

June 4, 2020

Albemarle County Board of Supervisors  
401 McIntire Road  
Charlottesville, VA

Re: Comments on Albemarle County's Draft Phase 1 Climate Action Plan

Dear Members of the Albemarle Board of Supervisors:

The Piedmont Environmental Council is pleased to make the following comments on the draft of Phase 1 of Albemarle County's Climate Action Plan (CAP). PEC was formed in 1972 to promote and protect the Virginia Piedmont's rural economy, natural resources, history and beauty. We have been working for 48 years on local land use planning in Albemarle and Charlottesville, and have played a major role in shaping public policy and implementation.

PEC recognizes the effort the steps Albemarle has taken in recent years to fulfil the public's demonstrated interest to address climate change. We have suggestions about how our collective work to finalize this long-awaited plan can also prepare the community for the next update of Albemarle's Comprehensive Plan. For the CAP to be an effective tool in meeting the county's greenhouse gas (GHG) reduction strategy, it must be appropriately positioned within existing documents and planning efforts.

As we approach this Climate Action Plan as well as the Comprehensive Plan, we want to remind Supervisors of the long-term greenhouse reduction strategies that are embedded in over forty years of the county's commitment to environmental stewardship. For instance, Albemarle's growth management policy has successfully directed new population into designated areas which enables people to experience life with a lower carbon footprint while providing other significant co-benefits such as protecting our farms, our forests and our watershed. Now we have an opportunity to apply these same principles to build livable communities for all of our residents. Efforts to address climate change give new fuel and resources to realize the vision of balancing healthy ecosystems with active and vibrant development areas.

### **An opportunity to build on Albemarle's legacy**

"Climate change" is only mentioned directly once in the Comprehensive Plan adopted by the Board of Supervisors in July 2015. However, that should not be seen as a reflection on the long legacy of pursuing policies that have been beneficial to the environment. Let's begin with what is in place.

Recent actions on Climate Action taken by recent Boards of Supervisors can be justified by [Objective 8 of the Natural Resources Chapter](#) of the Comprehensive Plan.

*Recognize changes occurring to the earth's climate to anticipate and mitigate impacts to the County.*

The specific strategy called for in the plan is to “Study the expected effects of climate change on Albemarle County and develop a Community Resilience Plan to prevent harm to human and biologic health.”

Since adoption of this plan, Supervisors have:

- Adopted a strategic plan on November 7, 2018 whose top priority is “Climate Action Planning”
- Adopted a goal on October 16, 2019 to reduce greenhouse gas emissions by 45 percent by 2030 and to be “net zero” by 2050
- Began the first phase of the Climate Action Plan
- Set aside \$250,000 for a weatherization program to be conducted by the Albemarle Housing Improvement Program
- Set aside \$500,000 in funds to support programs called for in the CAP (to be determined)

#### **General thoughts on the Phase 1 CAP Draft**

- The opening page of the Climate Action Plan must do more to reflect Albemarle’s long-standing commitment to environmental stewardship. We live in a world envisioned in the 1970’s by Albemarle residents who campaigned to protect natural resources from sprawl and overdevelopment. The primary goal was to ensure the water supply would be able to support anticipated development. While we understand the need to keep this document free from jargon, the crucial role the Comprehensive Plan has played and will play must be understood by anyone. The CAP provides an opportunity to talk about why key tenets of the Comprehensive Plan have been providing climate benefits all of this time.

In the sidebar, the page directly quotes the overall Comprehensive Plan vision, but does not acknowledge the source. This should be stated clearly to underscore the CAP’s role within a long tradition of growth management in the name of environmental protection.

There should be language in the purpose statement to underscore how policies to reduce urban sprawl have already had an effect on lowering the community’s overall footprint. A well-designed transit system, for instance, is in many ways a climate action program. In addition to ensuring everyone has equitable access to transportation, working transit reduces vehicle miles traveled (VMT) contributing to the community’s climate goals.

Land conservation is also a climate action program, and we support many of the actions called for in the Landscape, Natural Resources, and Agriculture section. One of the best economic development strategies for Albemarle is to continue investments that also have the shared benefit of implementing the CAP.

- The inclusion of key terms & abbreviations is welcome, but a review of this page is necessary. There are many more terms that should be included on this list to educate the public. One missing term is “Comprehensive Plan” and that should be added. That would help people understand how the CAP Plan is embedded in the Comprehensive Plan. In fact, defining that term here would better embed the CAP inside a series of planning documents. Others include “land use” and “vehicle miles traveled.”
- The first paragraph of the introduction page must recognize the climate crisis is more than a potential problem. There are examples that demonstrate the threat is real, such as torrential rains on May 31, 2018 which claimed the lives of two people in a flood when Ivy Creek was overpowered. This entire page would benefit from becoming more localized. That includes pointing out the community benefits that come from long-standing policies. While shared benefits are included elsewhere in the narrative, a few bullet points here would help citizens understand that addressing climate change continues Albemarle’s environmental stewardship and creates a more resilient community

The county’s previous work to direct growth to designated growth areas with appropriate density and served by transit as well as efforts to preserve land for rural uses has placed this community in a good place to begin a serious attempt to meet its GHG reduction goals. This should be celebrated and acknowledged in some way.

For instance, by designating the vast majority of Albemarle’s 726 square miles as rural, the county has prevented thousands of acres of urban sprawl, which would lead to increased vehicles mile traveled, additional impervious surfaces that would have to be treated for stormwater, and fewer available acres to continue to sequester carbon. One of the biggest things that can be done to ensure Albemarle meets its goals is to continue the course. New generations should be educated about this aspect and of the county’s long-held plans. We must protect and build off of the many gains that have been made.

- The draft CAP would benefit from having more examples of how specific actions would contribute to GHG reduction, as well as reflecting the other community benefits that come from government and private investments. The sooner the community understands the mechanisms of carbon reduction that will touch every aspect of our economy. We need to understand what benchmarks will be used to understand how success will be measured. The public would benefit from having some sense of how potential GHG reductions would be quantified and what mitigations would be prioritized. This will ensure that expenditures of public funds are invested wisely and return the highest dividends.
- Consider eliminating the At A Glance section. On first read, it may appear to some that the CAP is incomplete. It would be more productive to expand the history section and document the origins of Albemarle’s growth management policy. This would immediately implement actions in the CAP to educate the public about how it fits into an ongoing series of environmental initiatives 21st century Albemarle has been built upon. These include T.1.4, T.9.1, T.9.2, B.4.1, B.4.3, B.4.5, R.5.1, R.5.2, S.4.1, S.4.4, L.5.3, and L.5.4. That information work can begin now in the CAP with a list of existing programs.

The following are comments on specific sections and pages of the draft CAP.

### ***Importance of Climate Action Planning (page 12)***

- Albemarle has a long history in this arena as documented in our introduction to our comments. This page should recognize that there are many programs that have been underway in Albemarle for decades that have had a climate benefit that are so far not listed in the CAP. There is an opportunity in the second paragraph of this page to provide an example.

The image on this page could also be updated to include something more local. It would be worth the investment to hire a graphic designer to produce an image that conveyed the many interlocking relationships described in the text. The third paragraph contains a line that “the City of Charlottesville and the University of Virginia are simultaneously developing their own plans to mitigate climate change as a component of their respective sustainability programs.” Can we creatively express a way to illustrate the many ways that cooperation in our community has resulted in actual action on climate change? The public needs to explain why regional cooperation is crucial to addressing climate change and to be aware of existing partnerships, such as the Climate Action Together initiative of which Albemarle is a member.

### ***Climate Science and Understanding (page 13)***

- While the national and international background is important, this page is lacking in information about the threat to Albemarle County. There should be some language that localizes the issue and talks about threats posed by climate change, and specific actions to make our infrastructure more resilient. How resilient is our stormwater infrastructure and is it prepared to withstand more frequent storms? What is the current tree canopy in both rural and urban Albemarle?

On page 14, the second paragraph states that “not only have wildfires in the states of California, Oregon, and Washington gripped national news, for example, but Virginia is also expected to see more fires in the Appalachian Mountains.” What local data can be used to strengthen the argument?

Page 14 offers an opportunity to talk about increased flooding events, including the flood in May 2018 which claimed the lives of two people at Ivy Creek.

### ***Our Commitment to Climate Action (page 15)***

- This section contains much information that provides context to how the CAP fits into Albemarle’s history. There is an opportunity to state clearly that Albemarle’s embrace of growth management policies was done to protect water quality. The conversations in the 1970’s were as spirited as the ones we have now, and it’s important to remember this history and draw connections.

In the fourth paragraph, there is a line that describes the September 7, 2011 decision to leave Cool Counties.

“At the same meeting, the Board rescinded the Cool Counties community-wide GHG reduction pledge and approved a plan directing staff to improve the sustainability of County government operations and to promote sustainable practices throughout the community.”

Was that work ever conducted? Why did it take six years to reaffirm support? Why has it taken three years to get to this point?

This historical information is very important, and it needs to be made clear that both the Comprehensive Plan and the zoning ordinance were changed because of this community decision to place a priority on water quality. The proper role of the CAP is to make sure community support finds its way back to the Comprehensive Plan, which represents the citizen vision and serves as the linchpin in the great wheel of Albemarle government.

The yellow box on this page is useful, but the addition of a final sentence would strengthen the paragraph. A suggestion is “The CAP is intended to provide guidance on how the actions of individuals, institutions, businesses and government entities fit together toward a collective goal.

### ***GREENHOUSE GAS EMISSION REDUCTION TARGETS (page 16)***

- One of the biggest questions is when the new inventory will be conducted. What is the cost? Is there funding set aside? Why would we want to postpone this critical step until Phase 2? An inventory should be conducted as soon as possible. The first goal is only ten years away.

There is a reference to the Comprehensive Plan in the side bar and it is only one of two mentions of the plan in the CAP. This is not enough. The Comprehensive Plan needs to be introduced much higher in the document and should be included as one of the definitions.

Figure 4 on page 17 is misleading and should more clearly be labeled as an aspirational target. The caption should state that these targets were called for by the Board of Supervisors in October 2019.

This section of the CAP needs more examples of the scale of each mitigation. In the sidebar on page 17, there is a line about carbon sequestration and how Albemarle “intends to take into account for significant land use changes (for instance, new development) and take credit for any deliberate activities that sequester carbon.” It would be useful to have some sense of scale. For instance, is it possible to calculate the climate benefits of placing 4,500 of acres under permanent conservation easement? Is it possible to model the climate benefits of a successful redevelopment of an vacant shopping center? These are real world examples of the importance of considering land use policy through a climate lens.

### ***Phased Approach (page 18)***

- While we understand the financial and logistical constraints of taking the phased approach, there is demonstrated urgency to move forward. This can be accomplished in Phase One by adding language to the CAP that demonstrates the commitment Albemarle has to date, and to point out that Albemarle’s commitment to smart growth and transportation planning already addresses climate change. The investments Albemarle has made and will make in operational funding pays for planning staff who are there to implement the creation of infrastructure that will allow individuals to make different transportation choices.

We urge Albemarle to not wait until Phase 2 to begin the inventory process and urge this work continue as soon as possible. We need good data as soon as possible to be able to measure the effects of mitigation.

***IMPROVING PROSPERITY, HEALTH, AND QUALITY OF LIFE IN ALBEMARLE COUNTY***  
*(page 19)*

- The first paragraph on this page addresses additional community benefits that come with addressing climate change. We agree, and feel this language needs to be included in the introduction of the document. Albemarle has been addressing climate change for decades without specifically describing it that way.

The title of this page could be changed to better reflect the coordination between community benefits and climate action.

***TRANSPORTATION & LAND USE: STRATEGIES AND ACTIONS (page 25)***

- These are some general comments about the Transportation and Land Use section that begins on narrative on page 24. For the purposes of this document, we are concentrating mostly on this sector, but look forward to expanding our comments in the other sectors. As the introduction states, the transportation sector made up 48 percent of the 2008 GHG inventory.
- The strategy to “work with local transit partners to increase the use of alternatives to single-occupancy vehicles” is laudable. The word “local” should be replaced with “regional” to better reflect Strategy 3a and Strategy 3b of the Transportation Chapter of the Comprehensive Plan. 3a reads “continue to coordinate multimodal transportation planning among the City of Charlottesville, Albemarle County, and UVA” and 3b asks to increase and expand transit network efficiency and use throughout the region.” Since October 2017, the county’s involvement in the Regional Transit Partnership satisfies this portion of the Comprehensive Plan. The language in the Climate Action Plan should reflect this momentum.
- Another strategy is to “increase opportunities for bicycling, walking, and other alternative forms of personal transportation for daily travel.” This is a laudable goal, but it would be useful to have some metric of how this would actually work and the role land use must play. The right balance of urban density is in the best interest of the climate and is essential if we are to serve the community in a cost-effective/sustainable manner. The CAP should recognize this is a key tenet of the Comprehensive Plan.
- There is also an opportunity to turn VMT into a concept more generally understood by the public. This in turn would give residents a tangible connection with how their own actions lead to the greater good. Those actions include living with a connected community that implements the vision of the county’s many master plans. That would help with campaigns to incentivize people to make the choice to not drive alone.
- An acknowledgment of ongoing land use and transportation planning would also help draw attention to efforts to implement Objective 4 of the Transportation chapter which is to “strengthen efforts to complete a local transportation system that includes access to pedestrian and bicycle facilities.” This ongoing activity will have an effect on reducing pollution in our community. Public interest over CAP can be channeled to educate newcomers to local policy in standards and precedents that have been established through years of hard work.

- The COVID-19 epidemic gives us an opportunity to measure how another strategy in this sector might work in the future. This is to “partner with regional employers to encourage and incentivize reductions in single-occupancy vehicle commuting.” The sudden shift to teleworking, including use of video conferencing, gives us a real-world example of what happens when VMT drops. We must do what we can to measure the positive effects this has had on air quality and congestion, and use the CAP to shed new light on existing partnerships and initiatives. One example is the [University of Virginia’s Parking and Transportation Master Plan](#) which has 18 strategies to reduce single-occupancy vehicle usage. Specifically #16 which seeks to “achieve higher use of flex-hour/telecommuting.”
- Both the CAP and the Comprehensive Plan should call for a similar plan for the region, one that could be planned and implemented by the Thomas Jefferson Planning District Commission or the Charlottesville-Albemarle Metropolitan Planning Organization.

### *Comments on specific actions*

Before we begin a review of individual actions, there should be some sort of a legend which describes what each “timeframe” item represents. Some of these actions are already underway, and we suggest other definitions under the timeframe column.

Many of the items listed as “immediately actionable” should happen immediately, even before the CAP is officially approved. (T.1.1., T.1.2)

The usage of “initiate planning” for T.1.3 obscures the fact that Albemarle is a signatory to the Jefferson Area Bike and Pedestrian Plan, and that each of growth area’s master plans contains information about implementation. As such, a better phrase to use here is “implement planning.”

Likewise, the actions called for in T.2.1, T.2.2, and T.2.3 carry on the tradition of planning that Albemarle has been investing in since the creation of the Crozet Master Plan. Opportunities have already been assessed in growth areas. The adoption of the Neighborhood Model form of development in 2001 provided many incentives and strategies to create the building form for density. Further incentivization is underway through the creation of the form-based code for the Rio Road Small Area Plan. The CAP should provide readers with a connection to this plan, which is designed to convert 20th century shopping centers into a land use that better fits the needs of Albemarle in the 21st century.

In other words, Albemarle has already done more than “assess opportunities” and the CAP should be embedded inside of other documents.

T.2.4 could be changed to “continue planning” given that Albemarle’s housing policy is under review in 2020. We support the inclusion of this action because of the role it will play in increasing equity.

Likewise, all of the actions to “increase the use of public transit or other transportation demand management programs to provide alternatives to single-occupancy vehicles” are all also underway. For T.5.1, the Regional Transit Partnership continues to meet and PEC reminds its members every meeting that their real goal could be measured in terms of reduced VMT. The same arguments could be made for 1.5.2 and 1.5.3.

The strategy to “Partner with regional employers to encourage and incentivize reductions in single-occupancy vehicle commuting” is laudable but we suggest moving the action T1.6.1 to “Increase the use of public transit or other TDM programs to provide alternatives to single-occupancy vehicles.” Under that strategy, we recommend a new action to specifically call for a Transportation Demand Management (TDM) plan to be conducted jointly with the city of Charlottesville. This should be coordinated by the TJPDC and the Charlottesville-Albemarle MPO. This work must be integrated into the regional planning process, and better coordination is needed.

We have a cautionary note about the strategy to “Increase community awareness about alternative, clean modes of transportation and infrastructure projects in the county designed to facilitate ease of clean transport for residents.” Community awareness is a crucial requirement for successful community engagement and both T.9.1 and T.9.2 are laudable actions. However, who will do the work and what will the budget be? This is perhaps a role for a third-party entity rather than by the county itself. This caveat also applies to some of the activities listed in the “Increase community awareness about energy conservation and renewable energy” strategy.

### ***Buildings (page 28)***

There are many opportunities to use this section to remark on land use issues, and we look forward to some of the many conversations that will occur as the actions in this sector are implemented.

### ***Renewable Energy Sourcing (page 32)***

Albemarle should seek to support proposals that are a true win-win for the community. We should avoid projects that threaten existing carbon sinks such as forest, and those that impact prime agricultural soils.

As the county considers future applications for utility-scale renewable energy systems, PEC recommends careful thought. PEC is an advocate for solar energy, especially distributed solar power generation primarily designed to meet the immediate demands. In comparison, the size and nature of utility-scale solar facilities creates challenges for any locality to protect important resources and the public health, safety, and welfare of the community. Albemarle has thousands of acres of rooftops, parking lots, and landfills devoid of solar panels in areas of moderate to high energy demand. It is PEC’s belief that we should be looking to these developed areas as the low hanging fruit of future solar sites.

### ***Sustainable Materials Management (page 35)***

We also believe there are great opportunities to educate the public on the role they can play helping to implement the Sustainable Materials Management section of the CAP.

The CAP must also reflect efforts that are underway, such as active efforts by the City of Charlottesville and the Rivana Solid Waste Authority (RSWA) to “study the feasibility of residential curbside yard waste and food scraps composting.” A plan must document existing conditions and be embedded in work that is already underway.

*Landscape, Natural Resources, and Agriculture (page 38)*

We support the language in the two goals and look forward to working to translate best management practices for carbon sequestration into action that will help Albemarle meet its goals. The rest of the narrative is informative, but lacks language that quantifies how much carbon sequestration might have in meeting the targets. That can help justify increased investment in the county's Acquisition of Conservation Easements program which are called for in L.1.3, L.1.4,

We strongly support language under the Equity in Landscape, Natural Resources, and Agricultural that calls for afforestation in the urban areas. A sentence could be added to mention that the small area planning process gives opportunities to identify these locations.

**CONCLUSION**

Thank you for the opportunity to comment on the first draft of Phase One of the Climate Action Plan. We welcome the opportunity to continue the dialogue as we work toward implementation and approach the next update of the Comprehensive Plan. As it relates to that update, we continue to stress the importance of fully integrating the CAP within the plan. It is not enough to incorporate the CAP by reference. The goals and strategies of the CAP should be recognized within the relevant sections of the plan, thereby ensuring the effective implementation of the vision.

In conclusion, we believe that with revision, this document will guide the community as we rebuild many aspects of our society creating a more resilient and equitable place. PEC stands ready to assist Albemarle County as we all work together in this common cause.

Sincerely,

Sean Tubbs  
Field Representative, Piedmont Environmental Council  
Albemarle, Charlottesville and Greene  
434-422-2375 (cell)