

Allentown Environmental Advisory Council Recommendations on Climate Action Component of Vision 2030 Comprehensive Plan

As Allentown finalizes its Vision 2030 comprehensive plan which will set forth the framework for future planning and actions by the city for the next decade, it is critical to ensure that the plan includes a specific section on climate change and the city's commitment to climate action. Failing to quickly move forward on climate action planning would put Allentown out of sync with Pennsylvania's 2018 Climate Action Plan as well as the Lehigh Valley Planning Commission's climate action goals developed in 2014 as a component of the regional comprehensive plan which is now being updated by the LVPC in FUTURELV. It would also put Allentown out of sync with cities across the nation and across Pennsylvania (including in the Lehigh Valley) which are moving forward with climate action planning.

The climate change section in Allentown's plan can be included in the Living Systems discussion but should have be prominently addressed in its own section — much as the LVPC is proposing to do in its proposed FUTURELV plan. Other sections of Allentown's comprehensive plan should note connections to climate change as appropriate — again similar to the approach taken in the LVPC's proposed FUTURELV plan. Including such a section prominently and with a clear commitment to climate action would enhance Allentown's ability to be eligible for various types of funding that are becoming available for climate-related initiatives.

The climate change section in Allentown's plan should note the following State and regional actions to date and make the commitments recommended below.

At the State level, in 2018 Pennsylvania DEP issued the Pennsylvania Climate Action Plan which describes over 100 actions that can be taken by government, businesses and citizens to reduce emissions and adapt to a changing climate. The most significant of these include increasing renewable energy, incentivizing energy efficient buildings and increasing the use of electric vehicles. Further, on April 29, 2019 Pennsylvania joined the U.S. Climate Alliance with the aim of implementing policies that uphold the commitments our nation made in the Paris Agreement.

At the regional level, the LVPC's drat FUTRELV plan proposes several measures to "reduce climate change impacts through mitigation and adaptation," including reducing greenhouse gas emissions; encouraging sustainable building, site design and community design practices; promoting energy conservation and efficiency; supporting renewable energy; incorporating environmentally sensitive transportation technologies; and supporting business practices that mitigate the effects of climate change.

These measures are largely consistent with the LVPC's 2014 Climate and Energy Element Report in which the Lehigh Valley Planning Commission developed six climate change goals:

- 1) To protect, conserve and enhance natural ecosystems to provide long-term resilience to climate change
- 2) To protect public infrastructure from potentially harmful impacts associated with climate change
- 3) To protect residents, property and critical facilities from natural hazards as evolving over time due to climate change
- 4) To create a land use plan that helps mitigate climate change impacts through a compact urban development area, mixed land uses, higher densities in urban areas and through preserving land for agricultural and environmental purposes
- 5) To provide building and site design practices that help to mitigate climate change impacts
- 6) To reduce Lehigh Valley greenhouse gas emissions from residences, government operations and businesses

Recognizing that changes in energy use can significantly reduce greenhouse gas emissions, the LVPC also developed the following energy goals in its 2014 Climate and Energy Element Report:

- 1) To promote energy efficiency and natural resource conservation within existing and new buildings and land development
- 2) To encourage alternatives to automobile use, both motorized and non-motorized
- 3) To support the diversification of energy sources
- 4) To advocate increased energy conservation and energy awareness

We expect these and other more detailed provisions to be included in the LVPC's regional climate action plan to be developed after the FUTURELV plan has been finalized.

To ensure that Allentown's Vision 2030 comprehensive plan properly reflects State and regional goals and plans, and commits to maintaining alignment with future revisions of these goals and plans, the climate portion of Allentown's comprehensive plan should contain at least the following provisions.

A. Background on Climate Change. There should be a commitment to develop a climate action plan and an explanation as to why the city needs a climate action plan. A good explanation can be found in the DEP's 2018 climate action plan. The EAC recommends using DEP's explanation. The background discussion should also include a summary of DEP's 2018 climate action plan as well as the LVPC's 2014 climate action goals and the climate measures noted in the FUTURELV plan.

B. Governance Framework for Developing, Implementing and Reporting on Allentown's Climate Action Plan. There should be a clear directive for Allentown's Department of Community and Economic Development to be tasked with leading a climate action task force for developing (with public input) and communicating Allentown's climate action plan. The task force should include at least the representatives of the Allentown Environmental Advisory Council, the Department of Public Works, the Department of Parks and Recreation, the Allentown Planning

Commission, the LVPC and a diverse representation of city residents and businesses, including vulnerable populations.

Finalization of Allentown's climate action plan should occur no later than twelve months after the LVPC has completed its regional climate action plan. However, the process for selecting the members of the task force and an individual to lead this effort (all to be appointed by the Mayor), of identifying relevant city departments and obtaining their buy-in, and of soliciting public input and buy-in should begin immediately. The DCED should also be tasked with annually reporting to the Mayor and City Council on progress under the plan.

The governance framework should also include a commitment by the city to allocating the human resources necessary to begin development of the plan and a commitment to including in its budget cycle an annual assessment of costs to keep the plan updated, to develop implementation plans, to execute on those plans, and to track performance against goals.

C. Required Elements of Climate Action Plan. There should be a clear directive in the comprehensive plan that Allentown's climate action plan must contain at least the following elements:

- 1) An overview of the currently known climate-related challenges and opportunities that Allentown faces. Data on the city's demographics, education, employment status, equity, etc. developed in the Vision 2030 process should be incorporated. Environmental data such as biodiversity, green areas, water quality and air quality developed by the LVPC should also be incorporated.
- 2) A commitment to undertake a more thorough assessment of climate-related risks and hazards which would inform the city's adaptation measures with a requirement to complete the assessment by year-end 2020. Assessments conducted by the LVPC can be used for this purpose.
- 3) A commitment to net emissions neutrality by 2050, with interim goals and milestones based upon modeling as described below.
- 4) A commitment to model emissions based on the city's 2020 emissions as a baseline, modeled out to 2050 under at least two scenarios: a business as usual scenario and a scenario that includes reductions expected to be achieved through the city's climate action plan and expected actions by others. Work by the LVPC can be used for this purpose.
- 5) A commitment to developing the baseline inventory that includes at least the city's Scope 1 emissions, Scope 2 emissions from grid-supplied energy to the city, and Scope 3 emissions from waste generated within the city boundary. Work by the LVPC can be used for this purpose.
- 6) A commitment to adaptation measures in the short, medium and long-term with the aim of ensuring the fair and equitable distribution of social, environmental and economic benefits, and with priority given to transformational actions.
- 7) A commitment to embedding climate action in an integrated agenda within all city operations, taking an inclusive approach to empower all stakeholders and to deliver climate-related benefits across the city population, with special focus on

the city's more vulnerable populations. The timeline for each action and the methodology used for prioritizing actions should be documented and transparent, and the plan should be clear on which actions are conditional on the support of, or funding by, others.

- 8) For each element, the plan should state which city department will take the lead for developing the implementation plan and the operational roles and responsibilities of relevant city departments or third parties (such as the Lehigh County Authority) in implementing the plan. Where third parties have been identified as lead organizations, the role of the city in tracking progress, as well as partnership or collaboration arrangements, should be described.

The Allentown EAC requests the opportunity to work with the Community and Economic Development Department in further refining and drafting the climate action portions of Allentown's Vision 2030 comprehensive plan. Further, we request the opportunity to participate in the recommended climate action task force for developing the climate action plan and for providing input to the actions to be taken under the plan.

We appreciate the opportunity to continue to contribute to the City's comprehensive plan.