

Allentown Environmental Advisory Council Comments on Draft Allentown Vision 2030 Comprehensive and Economic Development Plan

Following are comments of the Allentown Environmental Advisory Council (Allentown EAC) on the draft Allentown Vision 2030 Comprehensive and Economic Development Plan (Draft Plan) dated September 16, 2019.

First, the Allentown EAC commends the City for accepting many of our preliminary recommendations (submitted September 2, 2019) related to including a specific section on climate change that recognizes the significant impact that climate change is likely to have on Allentown's future, and commits to developing a climate action plan.

As noted in Allentown EAC's preliminary comments, a thorough and aggressive climate action plan would align Allentown 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 align Allentown with cities across the nation and in the Lehigh Valley which are moving forward with climate action planning.

The City's proposal to place the climate change section under the Living Systems chapter is acceptable to the Allentown EAC. However, the last sentence of the goal under Living Systems needs to state a commitment to net emissions neutrality and should be broadened to include businesses and nonprofits. Following is our recommended wording (new wording underlined):

“In Allentown we will continue to take steps to reduce our carbon footprint and will achieve net emissions neutrality by 2050 at the latest through aggressive actions that include reducing our energy usage and increasing solar and other clean energy choices, increasing the use of mass transit and micro-mobility, increasing the availability of locally grown food, and enhancing the natural environment, as well as encouraging and connecting residents, businesses and nonprofits to opportunities to do the same.”

There should also be a clearer explanation of how the Living Systems goal aligns with Allentown's vision. The explanation on page 149 of the Draft Plan is focused on Economic Development rather than Living Systems. The discussion

on page 149 should be revised to discuss instead the health, environmental and economic benefits of high-quality Living Systems and should include a discussion of the importance of taking prompt, proactive measures to address the variety of significant impacts climate change will have on Allentown absent such measures. These effects would include increased vector-borne diseases due to higher temperatures and precipitation in the Lehigh Valley, increased food shortages, increased flooding, increased sewage overflows, increased home energy bills for cooling, and increased heat-related mortality.

With regard to steps needed to achieve the climate component of the Living Systems goal, we wholeheartedly agree with the next steps stated on page 151 of the Draft Plan which include preparing a climate action plan that integrates with regional plans, collaborating with local universities and schools to conduct research and engage citizens in the solutions, pursuing grant moneys, and partnering with the Allentown EAC to further define the Climate Action Planning approach. We believe, however, that work on climate action planning must begin right away. We recommend adding the word “immediately” in front of at least the second and fifth bullets on next steps (collaborating with universities and schools and partnering with the Allentown EAC on climate action research and planning). We also request that the Allentown EAC be included in the zoning review as proper zoning is integral to climate action as well.

Finally, we believe that development of a climate action plan and a resilience plan should either be included as Catalytic Actions in this chapter, or should be stated up front as foundational Catalytic Actions along with the zoning review and neighborhood planning. Climate action planning fits squarely within the definition of Catalytic Actions stated on page 34 of the Draft Plan: “Catalytic Actions are broad, structured programs or policies that will impact multiple Urban Systems. Implementing these actions will make the largest impact on Allentown, and have the potential to shift the way the city develops.”

A properly structured climate action plan would certainly contain broad programs and policies that would have a large impact on multiple urban systems, and would shift the way the city develops. As noted in our preliminary comments, Allentown’s climate action plan should 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 at the latest, with aggressive interim goals and milestones based upon modeling as described below, including goals related to energy efficiency, renewable energy, micro-mobility, mass transit, waste reduction, etc.
- 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 city priorities, taking an inclusive approach to deliver 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.

To ensure that this is done right, the city must allocate the necessary human resources and commit 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.

The City should also remain vigilant in identifying low-cost opportunities to take action immediately even before a climate action plan has been finalized. An

example would be micro-mobility programs. We suggest that the city take immediate action to support the implementation of micro mobility into the city structure. Micro-mobility includes bikes, electric scooters, electric bikes and more.

Current projects are underway to create a regional bikeshare program, similar to the current Muhlenberg College bikeshare. Through implementation of this plan, bikes and stations will be installed and maintained by Zagster. Zagster is a venture-funded startup company based in Boston, Massachusetts that designs, builds and operates bike sharing programs for cities, universities, corporate campuses, hotels, and residential communities across the United States. As of July 2019, it operated over 200 bike sharing programs. It costs 2k - 4k up front to host a station. Donors have already been identified and are ready to move forward. In addition, with the appropriate regulatory framework, micro-mobility can be structured in a way that is financially quite advantageous to the City.

The Allentown EAC sincerely thanks you for your consideration of our input on this important topic. We look forward to working with the City on the recommended climate action plan.

Respectfully Submitted,
Allentown Environmental Advisory Council
October 31, 2019