

July 12, 2019

Lara Cottingham
City of Houston
311 Walker, Floor 13
Houston, TX 77002



Dear Ms. Cottingham,

Thank you for spearheading the effort to draft a new climate plan for the City of Houston. After reviewing the Climate Action Plan's initial draft recommendations provided by the City and HARC, I would like to submit the following comments on behalf of Environment Texas:

1. According to the Pathways Model, the current draft sets the goal of cutting 2014 base greenhouse gas emissions by about 23% by mid 2030, then an additional 7% by mid 2040. From there, the Pathways Model then shows a drastic jump to zero emissions by 2050. We applaud the city for establishing a long term goal of achieving carbon neutrality by 2050, complying with the Paris Agreement. However, ambitious goals with sooner deadlines play a crucial role in encouraging short term progress and keeping the city on track to achieve its carbon neutrality vision. **This is why we are recommending that the City of Houston revise its interim zero net emissions goal to a 40% emissions cut by 2030, and 75% by 2040, in order to reach zero emissions by 2050.**
2. The current draft includes a commitment to "increase renewable energy use." The City already gets about 89% of its power from renewable energy sources, but should go to **100% renewable energy including securing direct purchases through Power Purchase Agreements (PPA) by 2020.** The City's reliance on Renewable Energy Credits, while appropriate a decade ago, do little to encourage the development of new wind and solar projects and should be replaced with PPAs. **The City should also establish a specific and trackable goal for renewable energy production at municipal buildings.** This could be a commitment to installing renewable energy systems on a certain number of city properties, such as on 50% of city facilities by 2040, or to supply a certain percentage of municipal energy use with onsite renewable energy. Many cities have made such commitments, from Cincinnati to Albuquerque to Orlando, and Houston should do the same.
3. The current draft encourages the update of current Houston energy codes both for municipal buildings and for the community as a whole, but does not include the specific goal of a zero net energy building code design. Building codes play a crucial role in improving energy efficiency, and we fully support this endeavor. In order to progress with this goal, **we recommend the city design a specific zero-energy building code that provides guidelines and mandates for zero-energy municipal and residential buildings by 2030.** The [City of Vancouver](#), British Columbia, as a part of their Greenest

City Action Plan, has adopted a similar standard, requiring all buildings built after 2020 be carbon neutral. Vancouver, along with Miami, Chicago, and Albuquerque, are some of the many cities committed to the [2030 Challenge](#), a pledge that endorses a complete zero-energy building code by 2030.

4. Achieving zero energy buildings requires use onsite renewable energy. We applaud Houston's adoption of a solar ready requirement for new construction and urge the city to go further by **adopting a policy that new homes be built with solar panels modeled after the [State of California's Solar Homes policy](#) that will go into effect in 2020, and include this commitment in the climate plan.** The [City of Lancaster](#), California was the first in the nation to adopt such a Solar Homes policy, and has since transitioned successfully to a net zero energy building code.
5. As written, this draft plan sets no specific goals or timelines to "support installations of rooftop solar on commercial, industrial, institutional, and residential buildings." Given the many benefits that distributed solar provides to consumers and the local grid, we recommend adding a specific goal to expand distributed or rooftop solar. **We recommend that the city adopt a goal modeled after [Philadelphia's](#) to put solar on 80% of currently suitable rooftops throughout the city by 2050.** The policies laid out in our [Ten Ways Your City Can Go Solar](#) guide would help in achieving such a commitment. The City should also establish solar-powered emergency centers, which can serve as staging sites during disasters, providing continuous electric service to support public safety agencies.
6. The draft recommendations currently omit reference to integrating resilience measures such as Low Impact Development (LID) and Green Stormwater Infrastructure (GSI) into building codes. LID and GSI features alike produce innumerable benefits such as reducing flood severity, runoff pollution, and urban heat island effect, while also mitigating erosion damage, improving air quality, and sequestering carbon. **The City of Houston should incentivize LID/GSI by moving towards a mandatory policy requiring new developments to use its features, and include this in the climate plan.** This policy can be supplemented by expedited permitting (and other regulatory incentives) and tax abatements (and other financial incentives) for developments that include LID/GSI. The City should also provide a stormwater fee discount to developments that include LID/GSI, and give them special recognition. We additionally recommend an increase in public education efforts on stormwater pollution and GSI, and implement stronger water quality and stormwater retention requirements.
7. Within the transportation goals, the recommendations include a complete shift of the regional fleet to EV and alternative renewable fuels by 2050. This goal is highly appropriate since 47% of Houston's annual greenhouse gas emissions derive from the transportation sector. But, the draft also includes a 100% conversion of the public fleet to "low E/EV/ZEV technologies and fuels by 2050." While this is another very appropriate goal, **we recommend the city hasten the public fleet conversion and redefine the**

goal to complete low E/EV/ZEV technologies and fuels by 2030 instead. This standard is outlined by C40's [Fossil-Fuel-Free Streets Declaration](#) and has successfully attained 28 signatories from across the world, pledging to make the streets of the city zero-emission by 2030. We urge you, as one of the C40 cities, to follow this lead.

8. The current draft recommendations omit reference to the city's public transportation. In order to reach carbon neutrality on the streets of Houston, the Metro system must be a leader in this initiative. In C40's [Fossil-Fuel-Free Streets Declaration](#), the initiative also includes a pledge to run only zero-emission buses beginning in 2025. **We recommend the City work with Houston METRO to follow this initiative and make the commitment to implement all zero-emission buses by no later than 2030.** Cities such as Los Angeles, Worcester, and Seattle have made the 2025 commitment or already began operation of these clean and quiet buses.
9. To further reduce the number of vehicle trips and miles traveled, the recommendations promote initiatives to "continue to retrofit and develop complete transit-oriented neighborhoods." A retrofit for densification is appropriate for the City of Houston, but the climate plan must include tangible actions in order to do so. Outlined in our [Growing Greener](#) report, we lay out the environmental benefits of a well-designed compact development. **The Climate Action Plan should provide specific recommendations to support transit-oriented developments, including eliminating parking requirements, expanding investment in the construction and repair of sidewalks and bike lanes, and electric vehicle charging infrastructure.**

Environment Texas urges you to make these changes in order to ensure that Houston's climate plan is ambitious as possible and encourages the rapid adoption of renewable energy to power our lives. Despite considerable progress towards a renewable energy future for Houston, we still have a long way to go to reach our potential. Not only will these steps help get us there, but they will foster a strong local economy, vibrant community, and healthy environment in the process.

Sincerely,

Luke Metzger
Executive Director, Environment Texas