

Staff Responses to Environmental Action Plan (EAP) Comments

The following staff responses are to public comments that were not added or addressed in the September 2019 update of the Draft Phase 1 EAP.

General Comments

Public Comment Overview	Staff Response
Recommendation to add benchmarks, metrics, and targets.	City staff agrees with this. The introduction of Phase 2 of the EAP explains that measurable benchmarks, metrics, and targets will be established during Phase 2 and 3 of the EAP. Priorities may also be established during Phase 2 and 3 to focus the City's efforts on the most impactful and/or efficient strategies.
Request to add names of specific businesses or organizations	The names of specific private businesses have purposefully not been added to the EAP. City staff recognizes that there are private businesses and endeavors currently underway that support environmental sustainability, however, the "Where are we now?" sections of each Goal is reserved to describes actions that the City has already taken and does not describe private endeavors. Recognizing that some actions will require leadership and support by non-City entities, "private businesses" may be listed as a responsible party for certain tasks.

Buildings and Energy

Public Comment Overview	Staff Response
"Where are we now" section should reference Energy Use Intensity standards	Energy usage would first need to be calculated for individual buildings.
Request to monitor emissions of waste-oil heating system	Added language to consider alternatives to the waste-oil heating system
Request to add EV chargers to municipal lots	This would be a difficult and costly proposal. There are different types of EV chargers, although there may be combination charging machines. They chargers must be on a level spot for accessibility purposes and many of the spaces are already being used for accessible parking close to buildings. To find other level spaces you would have to move further from the building – which would require cutting up asphalt and adding more wiring. The City continues to evaluate opportunities as grants and partnerships become available.

Request for addition of renewable energy to the EAP	Strategies and tasks have been edited and added to encourage renewable and sustainable energy sources. However, no strategies or tasks have been added to the plan that recommends directing the operations of HEC. HEC was established in 1956 by City Council as an independent, nonpolitical commission. While City Council appoints HEC Commissioners, City Council does not have authority over HEC.
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Land Use and Green Space

Public Comment Overview	Staff Response
Eliminate or reduce the amount of free parking or to require parking to be located differently on a parcel such as behind buildings and not adjacent to public streets and sidewalks	Strategy 1.2 within the Land Use and Open Space focus area references the chapter on Sustainable Transportation. Strategy 6.1 within the Sustainable Transportation focus area recommends considering revising off-street parking regulations to remove parking minimums in the Zoning Ordinance. City staff and Planning Commission will be evaluating as part of another City project and may recommend removing parking minimums and/or creating parking maximums where appropriate or as appropriate for particular land uses. Additionally, Strategy 1.1 of the Land Use and Open Space focus area describes reviewing the Zoning Ordinance and the Subdivision Ordinance and comprehensively updating the ordinances and Strategy 1.2 promotes higher density development. A comprehensive review and update of the Zoning Ordinance will be worked on over the next two to three years during which these topics and others will be explored.
Review the Zoning Ordinance to reduce setbacks and to allow accessory dwelling units and backyard apartments	Strategy 1.1 describes reviewing the Zoning Ordinance and the Subdivision Ordinance and comprehensively updating the ordinances and Strategy 1.2 promotes higher density development. A comprehensive review and update of the Zoning Ordinance will be worked on over the next two to three years during which these topics and others will be explored.

Sustainable Transportation

Public Comment Overview	Staff Response
Consider electrification and alternative fuel options for all vehicle classes	City staff will consider electrification and alternative fuel options for applicable fleet and transit vehicles. With current technology, switching to electric vehicles may not be possible. For example, Harrisonburg Fire Department cannot consider switching fire apparatus to become electric vehicles as they would not be able to risk running out of electricity during a response. The diesel engines in

	fire apparatus utilize the latest regeneration technology to reduce emissions to the greatest extent possible.
Reduce parking requirements and implement road diets	The EAP uses the terminology “lane reconfiguration” instead of “road diet”. Reconfiguration reallocates space to increase safety and access for all modes.
Highlight schools as a high priority for bicycle and pedestrian connectivity	The EAP incorporates this by referencing the Bicycle and Pedestrian Plan, which outlines schools as a priority for connectivity.
A question about the goal of signal optimization and alternative transportation goals conflicting with each other	Public Works is currently implementing a project that will provide crosswalk signalization at all signalized intersections that have sidewalks on both sides of at least one leg of the intersection (essentially, all signalized intersections with pedestrian infrastructure present). To address what may seem like a conflict between the two goals, pedestrian accommodation overrides optimized signal operations for vehicles. An example that many can identify with would be Port Republic Road, near the University and Exit 245, where many signals are closely spaced. The signals need to be optimized for maximum through put, as it’s a highly congested area, and the signals are coordinated as part of optimization. However, in the recent Port Republic Road traffic study that analyzed operations between S. Main Street and Devon Lane, we found out that the 700+ pedestrian calls per day made at the intersection of Port Republic and Hillside/Bluestone Drive interferes significantly with the signal coordination and therefore optimization. However, pedestrian calls are always serviced, despite the disruption to vehicular traffic. Pedestrian calls are never dropped to alleviate vehicular congestion. Both of these goals reduce greenhouse gas emissions.
Add strategies and tasks to add sidewalks, shared use paths, protected bike lanes, green lanes, bike boxes, bike corral parking, etc.	Recommendations for bicycle and pedestrian infrastructure improvements have not been specifically included in the EAP, but are included by reference to the Bicycle and Pedestrian Plan.

Waste Reduction and Recycling

Public Comment Overview	Staff Response
Ban the use of single use plastic bags	Virginia state code does not give the City authority to implement a ban or user fee for single use plastic bags. Goal 1 from this sector includes strategies that may assist in the reduced use of these types of bags.
Begin a program to collect compost city wide	Currently the City partners with a local group to provide composting collection services. This local group educates users on composting, collects the materials, and coordinates its disposal. The scale of the current program works well for the local group. Implementing a city wide program

	would be very cost prohibitive as it would require additional city staff, equipment, and storage areas, which limits the overall viability of the program. Goal 1 from this sector includes strategies that may assist in the use of this local groups composting program.
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Water Resources

Public Comment Overview	Staff Response
Do not use the South Fork of the Shenandoah River as a water source	<p>The South Fork of the Shenandoah River is a water source that has been studied and compared against alternative sources for over 20 years by staff, consultants, regulatory agencies, environmental interest groups and City Councils. The project is over 25% completed and will be commissioned within the next 3-5 years.</p> <p>The comments provided no reasons for the recommendation, but the most probable concerns would be for quantity of water that remains in the source waters and for the quality of the water that will be consumed. The following addresses these issues:</p> <p>Quantity: Pursuit of the Shenandoah source is primarily driven with efforts to protect instream water volumes during drought at the City’s current withdrawal locations at North River and Dry River. The other is to accommodate growth. With the Shenandoah River as an active raw water source, each of the City’s three water sources will be protected under Virginia Water Withdrawal permit requirements for instream flow rates to very protective levels.</p> <p>Quality: As compared to upper water shed sources such as Dry River, the Shenandoah River is a lower watershed source water and thus is subject to a greater variety of contaminant exposure but at lower levels due to dilution in the higher instream water volumes. In contrast, because of the extreme fluctuation in flow rates at North River, the Shenandoah River can at times be a better quality of raw source water during periods of high instream flowrates.</p>
Change water pricing to allow for cheaper use of basic amounts of water and incentive water conservation.	Current practice is to use AWWA Cost of Service Cost (COSS) protocol to apportion cost (through rates) to users to match the financial demand that they place upon the City’s operations. Response to this comment can be made in two perspectives. First, the value of environmental sustainability is not recognized in the COSS format and might be more represented and integrated. Second, the

	<p>concept of an initial cheap volume of water is possible, but it must be secondary to an initial requirement to collect fixed revenue needs through a means such as monthly minimums and alternative base rate charges. This is because 90% of the utility operating cost is fixed (is not influenced by water use) and because the water system has of aging infrastructure that must be funded for replacement (this cost is not be influenced by water sales). Consider that all customers receive water services for fire protection 7/24/365 without paying for the first increment of water. A healthy fixed revenue stream from all users is necessary to meet this need as well as to meet the criteria of lending institutions for good bond ratings.</p>
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