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City of Dallas - Office of Environmental Quality & Sustainability
Dallas City Hall
1500 Marilla Street, Room 7A North
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Via email to DEQS@DallasClimateAction.com.

CC: Brittany Hailey brittany.hailey@dallascityhall.com;

Susan Alvarez susan.alvarez@dallascityhall.com.

Re: Comments by Public Citizen on City of Dallas Comprehensive Environmental & Climate Action Plan (CECAP)

Public Citizen appreciates the opportunity to provide these comments on the City of Dallas' draft Comprehensive Environmental & Climate Action Plan ("CECAP" or "Draft"). If you wish to discuss our comments further, please contact Rita Beving at rita.beving@gmail.com, 214.557.2271 or Adrian Shelley at ashelley@citizen.org, 512-477-1155.

I. INTRODUCTORY COMMENTS

Dallas has set a goal of net zero carbon emissions by 2050, with an interim goal of a 43% GHG emission reduction by 2030. Yet the 42 (of 90) proposed actions that will reduce GHG's will only achieve, according to Dallas' own modeling, reductions of 18% by 2030 and 64% by 2050.

In other words, Dallas acknowledges that the CECAP will not meet its target goals. More initiatives must be included to achieve the city's goals and/or actions need to be accelerated to achieve faster GHG reductions.

Dallas' emissions inventory attributes 64% of CO₂e emissions to buildings and energy and 34% to transportation. Draft at p. 34. In fact, just three categories from the emissions inventory account for 94% of all basic level emissions: natural gas and electricity from the Stationary Energy Sector, and On Road emissions from the Transportation Sector. *See* "2015 Greenhouse Gas Emission Inventory" at p. 5.

We suggest that, to the extent possible, resources be allocated in proportion to emissions within each sector. Three of the eight CECAP goals focus on the areas responsible for 98% of emissions. Most of the actions within those goals are voluntary, rather than mandates or incentivized actions. More mandatory actions and investment to reduce emissions should be proposed in the categories responsible for 98% of total carbon emissions. Target dates for quantifiable emissions reductions should be tied to each action.

Comments from our members emphasize six basic actions.

Public Citizen encouraged its members and supporters to submit comments on this draft. In our suggested email, we list six basic actions the City could take to improve the CECAP (below). In these comments we affirm these basic suggestions and make more detailed suggestions about the draft.

- 1. More quantifiable actions.** Dallas must identify more actions with quantifiable emissions reductions to achieve its stated goals of 43% GHG reductions by 2030 and net zero by 2050. This is too important to come up short.
- 2. Articulate the need for financial commitments.** The city must invest money to achieve the emissions reductions goals of the plan. These investments will yield positive returns for residents and businesses in the form of reduced energy, transportation and health care costs.
- 3. Renewable energy investment.** Increase direct investment in renewable energy. The Dallas Green Energy Policy should not rely on renewable energy credits to achieve net-zero emissions from the electricity generation sector.
- 4. Electric vehicle purchases.** Expand and accelerate electric vehicle purchases. Dallas should not wait until 2030 to begin purchasing electric vehicles. All vehicles, not just light-duty vehicles, should be electric.
- 5. Public Oversight.** An oversight committee with diverse representation from the Dallas community should be created to track the implementation of the plan and identify new measures to add to the plan over time to meet emissions reduction goals.
- 6. Periodic Update of the CECAP.** The plan should clearly state that the CECAP will be updated in three years, after the city of Dallas completes its updated emission inventory. Frequently scheduled updates are essential to ensure that progress is being made and to identify where new opportunities to reduce emissions have emerged.

The 2015 emission inventory needs more detail in the stationary energy sector.

The 2015 emissions inventory presents emissions by subsector and shows the relative contribution of emissions by fuel type in the stationary energy sector. The fuel type only distinguishes between stationary combustion (or onsite fuel burning, e.g. natural gas, kerosene, or coal), electricity, and fugitive emissions. Electricity consumption contributes 77% of total emissions in the stationary energy sector. Draft at p. 30. But within the electricity fuel type the inventory does not distinguish among generation from fossil fuel or renewable sources.

The draft states that, “the GHG reduction estimates in this plan assume no change to energy sources beyond the 2030 target year assumptions.” Draft at p. 37. It is implied that those assumptions come from ERCOT’s 2018 Long-term System Assessment. But this is not clearly stated and there is no quantification of emissions reductions attributed to these assumptions. The draft should clearly identify those assumptions and demonstrate how they contribute to CO₂e reductions in the stationary energy sector.

More detail is needed for emission reduction targets and emission inventory updates.

Table 4 lists the City of Dallas 2030 and 2050 Emissions Reduction Targets. Draft at p. 34. From a baseline of 19,529,600 CO₂e in 2015, the targets are 11,159,800 in 2030 and zero in 2050. The 2015 baseline emissions are detailed in the 2015 Emissions Inventory, which lists emissions by scope, sector, and category:

Table A: 2015 GHG emissions Summary:

Scope	Sector	Categories	Community Scale CO ₂ e (MT)	Government Scale CO ₂ e (MT)
Scope 1	I Stationary Energy	Coal	95,888	
		Fuel Oil	359,529	
		Natural Gas	1,893,877	14,599
		Natural Gas Fugitive Loss	514,008	3,962
	II Transportation	On Road	6,779,889	58,639
	III Waste	Solid Waste Generated	135,055	135,055
		Wastewater Treatment	273	273
		Closed Landfills*	5,433	431
	IV Industry	Industry*	645,115	
	V Forestry	Land Use*	(382,452)	
Scope 1 Total			10,300,296	212,960
Scope 2	I Stationary Energy	Electricity	9,678,871	450,622
		Renewable Energy Credit (REC)		(186,230)
	II Transportation	Railway	69,738	<1
Scope 2 Total			9,748,609	264,392
Scope 3	I Stationary Energy	Electricity Transmission & Distribution Losses (T & D Losses)*	499,129	
	II Transportation	Aviation*	70,252	
Scope 3 Total			575,918	-
Basic Level Emissions			19,527,127	476,921
Basic+ Level Emissions			20,364,604	477,352

Note: *Categories included in Basic+ level emissions.

The CECAP states that the CURB tool was used to model emissions reductions. Draft at p. 34. The draft also states that, “Total estimated reductions from CECAP actions are approximately 8,500,000 MT CO₂e/yr. in 2030 and 24,000,000 MT CO₂e/yr. in 2050.” Draft at p. 35. The CECAP should present the results of this modeling of total estimated reductions for the 2030 and 2050 targets with the same level of detail (scope, sector, and category) as the 2015 emissions inventory.

We have recommended a three-year review and revision of the plan to coincide with the emissions inventory updates. We recommend that each inventory update, and the review and revision, also use the same level of detail as the 2015 emissions inventory.

The Draft states that “Appendix E summarizes actions included in each GHG reduction estimate and assumptions made regarding their adoption.” Draft at p. 35. Appendix E wasn’t included in the pdf draft of the CECAP and isn’t apparently available on the website.

More mandatory and investment-driven strategies are needed.

The Draft states that, “The actions presented in this plan are designed to be implemented with an initial emphasis on education and voluntary participation, followed by incentives, then mandates, and ordinances.” Draft at p. 37. The plan even clearly states that “there are currently *no new mandates* included prior to the 2030 target year.” Draft at p. 37 (emphasis added).

The city’s “phased approach to implementation” is not aggressive enough to achieve substantial results. The CECAP divides actions by “Action Type” using the categories “program,” “partnership,” “educational,” “incentive,” “plan,” “assessment,” and “mandate.” We assume that the most effective actions would be mandates, because they require action, and incentives, because they offer funding for an action. We suggest an emphasis on mandatory rather than voluntary actions, as well as financial investment in the actions that will bring the largest near-term reductions in carbon pollution.

Among the 90 actions there is very little prioritization aside from the timelines of implementation indicated such as “immediate,” “short,” and “medium” horizon. There is no quantification of GHG reductions for individual actions, using the CURB model or otherwise. There is no quantification of any planned investment and no cost or cost range given for any actions.

Appendix D lists GHG emissions reductions assumptions. Draft at p. 156. The Appendix bundles proposed actions under objectives and lists assumptions associated with each objective. The assumptions are somewhat like 2030 and 2050 targets, but they do not quantify emissions reductions from each objective or bundle of actions. These assumptions seem to be the “draft metrics” that are referenced on p. 44 of the plan. The plan later says that the metrics need to be finalized during CECAP updates. Draft at p. 142. We recommend that these metrics be finalized as soon as possible and that the CURB modeling tool be used to model emissions from each action or bundle of actions.

Our focus in this analysis is on the 42 actions related to Goals 1, 2, and 3. These are the goals for the buildings & energy and transportation sectors that account for 98% of total emissions. For those actions whose primary benefit is listed as Mitigation, all of them estimate “low” or “low-medium” GHG reduction potential. Among the mandated actions, only two of them (**B10** and **T10**) list even low-to-medium GHG reduction potential. Dallas should seek strategies that it can immediately mandate and/or fund to achieve significant GHG reductions. For example, the city should not wait until 2030 to purchase electric vehicles when such purchases could begin immediately.

Other General Comments

The draft includes proposals to expand PACE (action **E9**) and weatherization programs (action **B4**). These programs are underpromoted today, and in the case of weatherization, our sources indicate that the program is staffed by a single employee who is up to year behind in their work.

If funding is an issue for these and similar actions, Dallas could consider raising funds through stricter enforcement of existing regulations including water restrictions, stormwater, etc. Imposing more fines for violations could fund program staff and have the added benefit of deterring bad behavior.

In order to ensure that the CECAP succeeds, we recommend the creation of an oversight committee to ensure that the plan is timely implemented and appropriately funded, as City staff, Mayors and City Council members will continue to change over the lifespan of this plan. Members of existing stakeholder groups would be good candidates for the committee.

II. BUILDINGS

The buildings actions are intended to meet goal 1: “Dallas’ buildings are energy-efficient and climate resilient.” Draft at p. 45. Electricity use in buildings falls within Scope 2 emissions of the stationary energy sector. At 9,678,871 metric tons of CO₂e, this represents half of all community scale emissions. The CECAP should state more plainly what a significant contribution to emissions this category is and develop more clear strategies to transition buildings to consuming cleaner energy. The draft does state that, “Improving the electricity grid energy mix is critically important to achieving the City’s carbon neutrality target.” but it concludes that it is “difficult for cities to directly regulate this sector.” Draft at p. 38.

Given the huge contribution of energy use in buildings, we recommend more aggressive action to get energy consumers to transition to clean energy.

B2. Dallas should move beyond Level 2 Airport Carbon Accreditation for Love Field by immediately pursuing Level 3. Dallas should go pursue Airport Carbon Accreditation for Executive Airport, not just “consider” it. Draft at p. 48.

B4. According to reliable sources, the City weatherization program only has 1 employee, and is almost a year behind in work. If this program is to be effective, it requires the personnel needed to execute it. Also, this program affords training and employment opportunities for the southern sector and disadvantaged communities if training is provided through community college and high school tech programs.

B5. PACE is a good program, but aside from the Dallas website, it is poorly promoted. The PACE program needs to be better communicated to commercial and multi-family residential entities so it is better utilized for energy efficiency upgrades.

B6. This action would establish a building electrification program for existing buildings to replace appliances and systems with electric options. The city should promote electric appliances in retrofits of existing buildings.

We suggest the plan also encourage, incentivize, or even mandate electric appliances in new buildings. The city could discourage or ban the use of natural gas in all new construction. Alternatively, the city could amend its energy code to require builders who still want to install natural gas appliances to make buildings “electric ready” with side-by-side installation of electric outlets to facilitate later replacement of

natural gas appliances with electric appliances. This would disincentivize electric appliances without an outright ban.

B7. The goal to, “Increase participation and scope of the Dallas Green Business Certification program.” should include numerical targets and dates for increased participation.

B13. This section on the “urban greening factor” mentions “green roofs” as one of several urban greening ideas. Green roofs could become their own strategy with clear numerical targets and dates. Other cities, Atlanta for example, have included green or cool roofs as a singular initiative in their plans.

Other initiatives that could be included in the CECAP are:

- Dallas should consider asking owners to submeter their buildings. Submetering enables the improved performance of new and existing buildings through the transparent and more efficient management of energy in maintenance and operations. Submetering can help drive behavioral change as it relates to energy conservation. See the Atlanta plan.
- The City should design an energy performance program which would require less efficient buildings to make periodic cost-effective, incremental energy improvements.
- Minimum energy efficiency standards should be set for rental properties. This is part of Denver’s climate plan establishing minimum energy standards for rental housing. Denver plans to communicate to property owners that energy efficiency, renewable energy adoption, and other emissions reduction strategies from fuel switching are implemented cost-effectively for residents.

III. ENERGY

Goal 2 is, “Dallas Generates and Uses Renewable, Reliable, and Affordable Energy.” Draft at p. 63. The draft states that 77% of Dallas electricity is generated by fossil fuels. But the plan also acknowledges the remarkable growth in the renewable energy market and concludes that, “Dallas has the potential to take much more advantage of solar technologies.”

The draft asserts that Dallas, “achieves 100% renewable electricity usage through the purchase of renewable energy credits (RECs).” Draft at p. 64. Clean energy advocates have long suggested that Dallas should move away from REC purchases in favor of direct investment in wind, solar, storage, and other clean energy technologies. Houston, for example, recently invested in a partnership for a solar farm in Presidio. At a recent City of Dallas stakeholders meeting, we were told that future investment of this sort is “implied” in the plan language. But we see nothing in the plan that commits Dallas to any direct investment in clean energy technologies.

The last two contracts have been awarded to TXU, one overseen by a former TXU employee, and the most recent contract by a consultant. Ten-year power contracts, which will have such a financial and environmental impact for the City, should be overseen in a transparent process with independent review.

Oncor’s Solar Residential Program helps offset the cost of installing solar panels. Draft at p. 65. But Oncor runs out of money for this program in the first few months of the year. More funding for the program is needed so that more people can take advantage of it. The City of Dallas could push Oncor to

include more money for this program at the next rate case. If Oncor won't expand this program, then Dallas could devise a program to offer its own incentives for solar installation.

There is no discussion about demand side management anywhere in this plan. The 2015 Austin plan notes that it wanted 900 mw by 2025. There is no mention of Dallas even educating commercial users about power savings with demand side management.

As with solar, the City of Dallas could offer its own incentives and could advocate for more robust energy efficiency programs in the next Oncor rate case.

E2. This action to invest in energy storage should give dollar figures and dates for target investment. Dallas should set an immediate goal of issuing a request for proposals for energy storage projects or clean energy plus storage. By comparison, the 2015 Austin plan sets targets by a date certain for 10 mw of local storage, 20 mw of thermal storage, and 170 mw of large-scale storage.

E3. Dallas has always under-promoted PACE, resulting in a lack of public awareness of the program. Dallas must specify what it will invest in promotion of PACE and set targets for its use. This is an opportunity for a partnership with the local Chamber of Commerce.

E8. Dallas should talk to Houston about its 50 mw solar farm that it invested in near Presidio to supply Houston 10.5% of its power needs. Other cities such as Atlanta have a goal of meeting 10% total energy demand with renewable installation on their city-owned facilities.

Other energy initiatives that could be included in the CECAP are:

- Dallas should provide incentives for the inclusion of clean, renewable energy in new community development plans or facilities. See the Atlanta climate plan.
- The City should work with local universities to perform resource and technical assessments to identify the best type and configuration of clean energy to install in various parts of the city. With resource assessment information available, local residents, businesses, and contractors will have an important tool to support the appropriate installation of renewable energy sources. One can look at the Spatial Planning tool developed by Georgia Tech's Geographic Information System department as an example.
- Specific customer choice programs should be developed for low-income and disadvantaged communities, including 100% low-income community solar and other renewable energy programs.

IV. TRANSPORTATION

On-road vehicles contribute 99% of transportation emissions. Draft at p. 31. Investment in transportation measures should reflect this contribution.

The opening of this section notes that the City maintains 5300 units in its fleet. Nearly 2000 are Alternative Fuel Vehicles (AFV). There is no breakdown of what types these vehicles are, but the plan should include a short term mandate to transition to 100% electric vehicles. Studies show that EVs are

better to reduce air pollution (meaning co-benefits to the plans air quality goals) and GHG emissions than compressed natural gas vehicles.

T1. There is a goal of 100% electric by 2040 for Dallas, DISD, and DART's bus fleet. There is an interim goal of new transit buses and light duty vehicles purchased *after* 2030 to be electric. Dallas should not wait to purchase electric vehicles. The plan should immediately mandate *all* vehicles (with the possible exception of some emergency vehicles) purchased by the City of Dallas, DISD, and DART be electric.

T3. This action should include clear targets with projected dates for the contractor and ride-share fleets.

T4. This action includes a potential metric for an overall number of EV charging stations with a portion of those EV charging stations located in vulnerable communities. Draft at p. 146. The targets for Goal 3 include, "Install more than 9,000 publicly available EV charging outlets throughout the City by 2030." Draft at p. 39. Dallas needs to accelerate its fleet transition, and an interim goal before 2030 would help with the city's EV charging infrastructure needs. We suggest an interim goal of 4500 charging stations by 2025.

T5. The inland port and nearby companies employ many from disadvantaged communities. Councilman Atkins has mentioned numerous times in briefings that the lack of transportation to get to this area needs to be resolved.

T6. The plan should set a deadline to hire the dedicated manager and staff for the Dallas Bike Plan and a deadline to update the Bike Plan.

T9. See T5 comment. DART needs to get ridership to this area.

T16. As with many of these concepts, there is no benchmark with the number or percentage of lights replaced and a stated date for this goal. Dallas took out the \$3.7 million to replace lights with LED at Fair Park in the last budget cycle. The plan should indicate a percentage of lights to be replaced and set clear target dates to complete those replacements.

Other transportation ideas that could be incorporated into the plan include:

- Alleviate congestion by moving semi-trucks off major thoroughfares during rush hour.
- Encourage businesses to electrify local and regional delivery trucks and other heavier vehicles.
- Encourage commercial and institutional entities to electrify their fleets.
- Impose no-idling ordinances in warehouse districts. And create a reliable mechanism for enforcement, possibly by local police (NCTCOG has resources for implementing no-idling policies).
- Coordinate bulk bus buys to secure better pricing for electric buses for DISD & DART.
- Railyards are not addressed in the CECAP. The city should set a deadline to electrify railroad switchyard operations. If not federally prohibited, Dallas should explore, even voluntarily, with railroad entities other strategies to reduce emissions.
- Establish a 1500-foot buffer on either side of a highway where daycares, residential developments, and schools would not be permitted to be built.

V. WASTE

Emissions from the waste sector contribute less than 1% of total emissions. Draft at p. 31. Improvements in solid waste handling generally can provide a variety of environmental benefits. But to the extent that we are advocating for more investment in GHG emission reduction strategies, investment in this sector should reflect emission contributions.

According to our allies who have worked in this area, much of the 2013 Zero Waste Management Plan has not been implemented after 7 years. Though an update is in progress, this plan should be more thoroughly implemented by now. Since commercial, institutional, and industry are responsible for two thirds of the waste, nonresidential waste streams should be the focus of implementation and promotion of new policies.

SW2. There is no date projected for developing the Green Procurement Policy. This is entirely within the City of Dallas' purview and the city should set a clear and aggressive goal to develop and implement the policy.

SW3 - SW4. These goals lack projected dates beyond a "medium" horizon. Draft at p. 150. **SW4** notes that Dallas is converting its diesel vehicles to CNG at this time. Dallas should start converting trash trucks and other related vehicles to electric vehicles, not CNG, now. Other cities, including Chicago, have or are planning to pilot EV trash trucks.

VI. WATER

Dallas contracts with wholesale customers are designed with a methodology that create a disincentive for customer cities to conserve water or initiate water conservation programs. This is a dinosaur system with 30-, 40-year contracts or more. With 38% of Dallas' water contracts for other cities/suburbs, much water could be saved with contracts that encourage or incentivize smaller cities to encourage residential and commercial users to conserve water.

Dallas and Region C have proposed to build new reservoirs hundreds of miles away in East Texas. We do not support new reservoirs or the pumping of water hundreds of miles to Dallas based on the highest peak use of water when there are opportunities to reduce water use with better contracts to inspire conservation.

Furthermore, the City acknowledges that reservoirs lose water due to sedimentation and evaporation. Draft at p. 99. Reservoirs require energy-consuming pumping and pipelines. Dallas should consider aquifer storage located near the metroplex, as other cities such as San Antonio have done, rather than build new reservoirs. This would be a local solution that eliminates some of the problems reservoirs present.

Dallas also needs to look at additional conservation measures, especially with large water users and the commercial sector, to conserve water and promote water efficiency. Instead of waiting for these bigger water users to call the City for an audit, Dallas should offer audits to large water users now.

Dallas has at times done a poor job of enforcing water restrictions in the past. Dallas should enforce against violators of stormwater standards and residents violating water restrictions. Enforcement will encourage compliance and fines to build revenue that can supplement proposed programs.

In order to prevent water pollution runoff, we recommend the city zone polluting industries out of floodplains and away from close proximity to vulnerable water sources.

WR1. Dallas mentions partnering with other cities for conservation outreach. This is a good PR idea, but the biggest disincentive for cities to put conservation into practice is the antiquated contract system with regional water providers including Dallas. For instance, there are cities suing NTWMD over their “take or pay” contracts. Though Dallas’ contract structure is slightly different than NTWMD’s, leading the City to claim that is technically not “take or pay,” all Region C customer cities would save millions of acre feet of water if Dallas, NTMWD, Tarrant Regional, and the Upper Trinity Water District would get rid of such contracts.

For example, Farmers Branch (FB) gets its water from Dallas. FB is not required to do *anything* during a drought, not even twice a week watering. FB’s Mayor and City Council indicate that since they have to pay for water from Dallas--whether they use it or not--there is no real incentive for water conservation. Millions of acre feet of water could be saved if better contracts were designed by Dallas Water Utilities and other water providers. Expensive reservoirs with miles of pumping in pipelines could be avoided if customer cities would conserve water.

WR2. The average leakage rate for the City of Dallas, and the state of Texas, is 10%. We suggest Dallas should set a goal of 6% maximum loss by 2025.

According to the last 2016 Region C Water Plan of which Dallas is a member, it indicated Dallas' water loss of up to 15.86% in 2013, and this 5.86% improvement during a 6-year period (through 2019) is commendable. However, there are cities in the region who during the same 2013 reporting period were then achieving rates of less than 10% loss including Irving (6.23%), Lewisville (6.55%), Garland (8.19%). If Dallas can reduce almost 6% leakage in 6 years (2013-19), then a new goal to reduce down to 6% by 2025 is reasonable. Goal setting with targets and a date certain are important.

For many smaller DFW customer cities, the amount of leakage is higher than the 9-10% average. If water contracts were designed to inspire conservation, perhaps the money these smaller cities could save would in turn allow them to fix leaking infrastructure. Contracts that inspire conservation would also encourage these small cities to use gray water in watering golf courses, parks, etc. instead of potable drinking water.

WR3. The reuse of water for nonpotable purposes is a good strategy. The CECAP should clearly identify which golf courses, etc. aren’t using gray water and set goals for a transition. According to the 2019 Dallas Water Plan, Dallas supplies gray water to two municipal golf courses, Cedar Crest and Stevens Park, saving 1.0 mgd in potable water. Dallas owns 6 municipal courses. The other four courses should immediately transition to using gray water for watering. There are 26 courses in the Dallas area, some which belong to private entities and customer cities of Dallas. These cities should also become part of a transition plan to use gray water to save potable water. Dallas can do this as it is already selling reusable water to other neighboring water districts.

VII. ECOSYSTEMS

While this plan proposes planting new trees, there is little action presented to protect existing, mature trees within Dallas.

EG5. There is no date projected (beyond a “short” horizon) nor a benchmark number assigned to convert Parks & Recreation Department equipment to electrical.

VIII. FOOD

Dallas should prioritize bringing grocery stores to food deserts. Addressing food deserts is an equity issue whose primary benefit is to environmental justice communities. Community gardens are good, but if a person works 2-3 jobs in order to afford their living expenses, they may not have the time to take advantage of these garden offerings.

Dallas could also encourage restaurants to use recycled or recyclable materials in their operations and take out services. Reduce or ban styrofoam takeout boxes, plastic straws, plastic bags for takeout, etc.

IX. AIR QUALITY

The plan fails to mention that Dallas has been in nonattainment of the ozone National Ambient Air Quality Standard since 1991. Unfortunately, some of the agencies the plan relies on as partners for cleaner air are the same entities that have failed DFW for almost 20 years. The status quo has not succeeded and something significant needs to happen.

Dallas should recognize that strategies to reduce criteria pollutants--especially nitrogen oxides--will also reduce carbon pollution. The City and the region (through NCTCOG and other regional actors) contribute significant resources to reducing criteria pollutants. The City should explore partnerships with these actors to reduce both criteria pollutants and GHGs.

AQ1. It is important that TCEQ place air monitors where it is most likely to capture data based on wind direction. The environmental community has witnessed air monitors (ie. Midlothian vs. Venus) that are placed in such a position as to *avoid* the major flow of industrial emissions.

AQ3. The Air North Texas campaign has had little to no visible public promotion in recent years. This program should be scrapped or revamped to actually promote cleaning up the air in Dallas.

AQ4. Disallowing industry permits near vulnerable populations will be one the biggest challenges to solve for Dallas. Dallas has continually permitted various facilities including batch plants, concrete crushing plants, and other dirty facilities too close to schools and low income, residential neighborhoods. The piling on of polluting permits in disadvantaged neighborhoods, due to the fact they’ve been dumped on before, has to stop.

X. MISCELLANEOUS COMMENTS

Ideas from other groups and cities:

- The City should give incentives to cleaner industries while imposing more requirements on polluting industries to ensure a clean and safe environment.
- Dallas should strengthen the enforcement of existing ordinances:
 - Idling at truck stops.
 - Stormwater violations.
 - Violations of water restrictions.
 - Nuisance violations.

More public education and signage is needed to deter the violations of these ordinances. Perhaps this can be done in partnership with NCTCOG.

Public Citizen would like to acknowledge our peer groups and the cities from which we drew some of the ideas in these comments, including Downwinders at Risk, Texas Campaign for the Environment, the Sunrise Movement, Dallas350.org, Dallas, the Cities of Austin, Houston, Atlanta, and Denver.

Opportunities for the City of Dallas to lobby for state action:

- Advocate at the Public Utilities Commission for continued large-scale renewable energy investments.
- Encourage the reestablishment of the Low Income Vehicle Repair Assistance, Retrofit, and Accelerated Vehicle Retirement Program (LIRAP), or have Dallas develop a local version of the program.
- Advocate for the development of new or enlarged programs for the Texas Emissions Reduction Plan (TERP). Beginning in 2022 TERP revenue will increase from \$75M to \$250M/yr.
- Encourage the legislature to modify the tax-free holiday for energy efficient appliances that are only electric, and not natural gas. Create a rebate program for all electric appliances including lawn equipment, leaf blowers, etc.
- Encourage more investment in transmission lines to allow more wind and solar to come online in Texas.

Errata:

There is an inconsistency in how figures are numbered and referred to throughout the draft. See e.g., p. 35-36 (Figure 13 vs. Figure 1), p. 42 (Figure 14 vs. Figure 2), p. 42-43 (Figure 15 vs. Figure 3), p. 45-46 (Figure 17 vs. Figure 5).

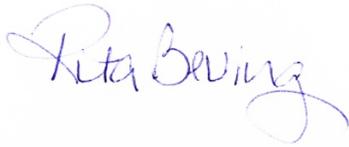
Appendix E, mentioned at Draft p. 35, is not attached to the pdf of the plan or available on the website.

Page 34 states GHG emissions from transportation are 35% while the first sentence of page 72 states transportation emissions are 34%.

Conclusion

Again, we appreciate the opportunity to provide these comments. If you wish to discuss the issues raised, please contact Rita Beving at rita.beving@gmail.com, 214.557.2271 or Adrian Shelley at ashelley@citizen.org, 512-477-1155.

Respectfully,



Rita Beving
Public Citizen



Adrian Shelley, Texas Office Director
Public Citizen