Subject: comp plan sustainability suggestions

From: KEN GARBER
Sent: Wednesday, June 25, 2025 8:27 AM
To: Planning <Planning@a2gov.org>
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Dear Planning Commission:

Thank you for your diligent and grueling work on the comp plan. My apologies for the length of this message, but I'm writing to expand on my April 21 meeting public comment. In my view, the June 2025 comp plan draft is a regression and a retreat from city sustainability goals articulated in the Ann Arbor Sustainability Framework (part of the current 'master plan'), the 2020 A2ZERO plan, and even the 2012 Ann Arbor Climate Action Plan. The Framework's goal is to "eliminate net greenhouse gas emissions in our community"; the A2ZERO plan assumed that starting in 2022 "All new residential and commercial buildings are designed and built to operate without the use of natural gas,"; and the 2012 climate action plan calls for "changes that most likely eliminate reliance on fossil fuels by the building and transportation sectors." (By 2050, but still.)

The comp plan language, by contrast, only mentions reducing emissions, not eliminating them, along with "potential conflicts with promoting affordability." There is scant mention of building decarbonization. This is a problem, since fossil fuel infrastructure in new construction is much more consequential than reduced commuter emissions, and locks in emissions for decades. The Values Framework on page 47 includes the following statement: "**Requiring any individual housing development project to meet 100% of each and every metric – whether it is related to carbon neutrality or natural features mitigation – increases the cost of construction, making it cost prohibitive to build or making the resulting housing more expensive.**" This "straw man" argument should be removed. For heat pump HVAC systems, it's true in the narrow sense--high efficiency heat pumps are more expensive than conventional forced air gas furnaces--but heat pumps double as air conditioners, and extending refrigerant lines to room heat exchangers removes the need for ductwork, so there is little if any difference in overall construction cost. My suggestions:

1.   Page 47: Remove the above highlighted sentence from the Values Statement. It is a not backed by any data, and "100% of each and every metric" is not a description of current reality. We do not now require new developments to meet 100% of "all metrics," whatever that means, or anything remotely close to that.

2.   Page 101: Modify (add to) the following statement: "In addition to transitioning to green energy, reducing **and ultimately eliminating** carbon emissions will require reducing buildings' energy use and resource waste."

3.   Page 101: Modify (add to) the following statement: "For new buildings, the city can develop design guidelines for high-performance buildings and full electrification, incentivize zero-emission technologies and energy reduction measures, **require advance modeling of energy efficiency and carbon emissions, link new fossil fuel infrastructure to the social cost of carbon,** and promote the utilization of mass-timber to reduce embodied carbon."

4.   In the implementation matrix following page 133 at the end of the document, under goal 11.2, add the following "recommendation/action": **"Require all new developments to model energy use intensity (EUI) and annual greenhouse gas emissions from fossil fuel combustion using standard modeling tools."** Timeframe: 1-3 years. Systems Planning: OSI. The rationale for this small requirement is to make developers accountable for the carbon impact of their buildings. The current "training and education" recommendation is insufficient.

5.   In my April 21 comments, I noted the frequency (37 times) the words "resilient" or "resilience" appeared in the first comp plan draft. In the new draft, it's 54 times (including footnotes). This is excessive and unnecessary, and subtly undermines the city's climate goals. This concern may seem idiosyncratic, but consider:

a.   The resilience concept emerged from the work of ecologist C.S. Holling, who described resilience as "the capacity of a system to absorb and utilize or even benefit from perturbations." Holling advanced the resilience concept as an alternative to the prevailing models of ecosystem equilibrium or "balance of nature.' The term has since been adopted by sustainability professionals to promote the capacity of infrastructure to recover from disasters, and indiscriminately applied by them to everything from economic development to interpersonal relationships.

b.   While it is in everyone's interest to adapt to climate change, "resilience" seems to offer adaptive solutions without addressing the root causes of global heating.

c.   The positive sheen of the term 'resilience' gives policy makers an easy escape from the politically fraught decisions that are necessary to reduce community greenhouse gas emissions.

d.   Although climate disruptions are inevitable, "resilience" suggests that the only reasonable response is to adapt. This also undermines urgent action to reduce--and ultimately eliminate--greenhouse gas emissions.

My specific wording suggestions:

1.   A definition of "resilience and resilience hubs" has been added to the glossary on page xi. It actually does not define resilience, only resilience hubs. Remove resilience from the header, leaving resilience hubs.

2.   It's too late to change "resilience hubs," some of which already exist, to "emergency preparedness centers," but many other references to "resilience" should be removed or modified. In some cases, the word or phrase can simply be deleted without changing the meaning of the sentence, except to take away the word's positive connotation, which is inappropriate in our current climate crisis.

3.   Page 39: change "climate resilience" to "climate action."

4.   Page 73: Modify this "key consideration": "The city's economic development strategy, A New Approach to Economic Development, calls for… diversifying the local economy to build resilience." Delete "to build resilience." The term does not (to my knowledge) appear in the economic development report.

5.   Pages 85 and 95. Modify Goal 8, "Increase community resilience to support disaster preparedness, climate change readiness, and community health and well-being," by deleting "Increase community resilience to." Just write, "**Support disaster preparedness, climate change readiness, and community health and well-being**."

6.   Page 85, under "Equitable," change "enhancing resilience for everyone" to "enhancing well-being for everyone."

7.   Page 95: change "strengthen social resilience" to "strengthen social connections." ("Social resilience" is meaningless.) Two mentions on that page, plus the same change to strategy 8.1 in the Implementation Matrix and Objectives at the end of the plan.

The other references to "resilient" and "resilience" are unfortunate but acceptable. I'm arguing for judicious employment of the term, instead of its indiscriminate use in the current draft.

Thank you for considering these suggestions.

Respectfully,

Ken Garber