

February 26, 2021

Montgomery County Department of Environmental Protection  
2425 Reedie Drive, 4th Floor Wheaton,  
MD 20902  
[REDACTED]

**Re: Montgomery County Draft Climate Action Plan**

To Whom It May Concern:

Please accept these comments on the Montgomery County draft Climate Action Plan (CAP) on behalf of the Coalition for Smarter Growth, the leading organization advocating for walkable, bikeable, inclusive, transit-oriented communities as the most sustainable and equitable way for the Washington, DC region to grow and provide opportunities for all.

We commend the county for its work on the CAP and dedication to addressing the climate emergency. A strong plan to mitigate, adapt, and respond to climate change is vital to our collective future. In the process, we must ensure equity, inclusivity, and justice. These policies and investments are also a major opportunity for economic development.

The recommended transportation actions are a great start, but with room for improvement. The draft CAP does a good job making sure that mode shift and travel demand strategies receive significant attention. As recent studies document, electric vehicles are not enough to meet our climate targets in the transportation sector. We applaud the county for presenting bold new strategies like congestion pricing and a carbon tax, as well as including its robust bus rapid transit and active transportation plans as climate strategies. We also applaud the equity provisions and considerations noted for each strategy.

Our recommendations to make the plan stronger and more effective are as follows:

**Land use strategies are missing.** Land use, including the location of jobs and housing and the use of community design to support transit and walkability, plays a major role in transportation emissions. Efficient land use and community design enable proximity to destinations and facilitate walking, biking, and transit use to reach them, which significantly reduces transportation greenhouse gas emissions (GHGs) by lowering vehicle miles traveled (VMT). Thus, transit-oriented development has significant potential as a climate strategy in the county. While TOD is already part of the county's community and economic development strategy, it is missing from the draft CAP and should be explicitly recognized.

Unlike most of the identified actions, sustainable land use governance is one area in which Montgomery County has near complete control. Montgomery County has implemented great policies in this regard over the years, such as making it easier to build accessory dwelling units and embracing smart growth in recent White Flint, Bethesda, Veirs Mill corridor, and Forest

Glen/Montgomery Hills plans. The county also already has, or will soon have, excellent transit infrastructure such as the Purple Line, which will support significant walkable TOD but neither this transit infrastructure or the potential for TOD is incorporated into the CAP's strategies.

The county can build upon these successes and make significant progress by further allowing and encouraging transit-oriented development, including by supporting a variety of housing types and uses in existing neighborhoods near transit. It is not enough to rely on Thrive Montgomery 2050 as a supplementary document to comprehensively lay out these strategies — these strategies should be integrated into the CAP as well.

In addition to land use strategies, the county should consider the location of its investments in affordable housing preservation and production. Housing in the right locations is a climate solution, and without intentional strategies to ensure a diversity of housing prices in desirable locations, moderate and lower income households will continue to be priced out of walkable, transit-oriented neighborhoods and forced to drive long distances for jobs and other amenities.

**Include a target for VMT reduction.** The GHG Emissions Reduction Pathway does not take into account the benefits from reduction in VMT. In addition to reducing the share of trips by low occupancy private cars, SUVs, and light trucks, the county also needs to set a target for and track how *many* miles are driven. This metric is a critical measure of the degree to which residents are able to shorten their vehicle trips and make fewer vehicle trips overall due to the proximity benefits of good land use planning and to increased telework and teleservices.

**The shift to 100% electric vehicles in the proposed timeframe may not be realistic.** We agree the rapid transition to electric vehicles (EVs) is a necessary step to decarbonize the county's transportation sector, but question whether the Transportation Emission Reduction Pathway (page 115) relies too heavily on an assumption of rapid adoption of EVs. Recent research prompts caution about the speed of adoption of EVs, and the draft CAP does not clearly state the assumptions and necessary conditions underlying the goal for 85% of the passenger vehicles on county roads to be electric by 2027 and 100% by 2035. If the transition takes longer, then the contribution of mode shift strategies (13% in draft CAP), as well as land use and VMT reduction strategies, needs to be increased to compensate.

Overall, the EV and micromobility strategies are good but disconnected from land use and housing strategies. Finally, actions related to EV adoption should be accompanied by actions related to the sustainable disposal of gas-powered vehicles.

**Include an action to eliminate highway expansions and new highways.** Expansion of highways and construction of new highways is directly at odds with our efforts to head off the climate emergency. We request language in the CAP committing to building no new highways and updating the Master Plan of Highways and Transitways in accordance. It's essential that we stop planning, expanding, and building new highways, and remove unbuilt highways such as M83 from the Master Plan of Highways and Transitways and other county plans.

**Focus on what the county *can* do.** Many of the actions in the draft CAP are understandably reliant on state and federal policies and investments and we appreciate the effort to evaluate the CAP actions where the county has authority and initial investment is most feasible. We strongly recommend identifying the top actions within the county's control with the greatest cumulative co-benefits and creating an even more detailed implementation plan for those actions. Land use — walkable, transit-oriented development, and investment in affordable housing near jobs and

transit, in particular — offers significant co-benefits on top of reducing greenhouse gas emissions.

Furthermore, in the current update to the National Capital Region Transportation Planning Board (TPB) Visualize 2045 regional transportation plan, the county should reconsider the \$1.8 billion in road widenings and new interchanges and the \$11 billion I-495 and I-270 expansion included in the previous 2018 plan. These projects will only increase VMT and GHGs. Montgomery County has an opportunity before April 2021 to change its project submissions and ask TPB to remove road and highway widening projects within the county from the updated Visualize 2045 plan and ensure that only projects which help the county and the region meet their respective climate targets are included.

### **Specific comments, suggestions, and questions:**

- Link actions T-1: “Public Transportation,” T-2: “Expand Active Transportation and Shared Micromobility Network,” and T-10: “EV Car Share Program” with a mobility hub strategy that ties together land use, transit, equity, and accessibility.
- Page 16. “Until the Fair Housing Act of 1968, discriminatory tools locked Black people out of the housing market...” Housing discrimination did not end with the Fair Housing Act. Black and brown people continued to be unfairly treated by government programs and discriminated against well past 1968.
- Page 17. “In the 1970s, the County attempted to rectify its wrongs in discriminatory housing by passing the first zoning ordinance of its kind in the country.” The wording in this sentence makes it sound like Montgomery County did not have a zoning ordinance prior to the 1970s, which is untrue. It would be more correct to say “by passing the first Inclusionary Zoning ordinance of its kind in the country.” “Inclusionary Zoning,” a more technical term, could also be replaced with “affordable housing set-aside requirement.”
- Page 117. We applaud the goal that “nearly 100% of county residents are within half a mile of a high-frequency transit stop.” This should be stated as a more specific target, made prominent in this section, and included in the targets on page 114.
- Page 119-120. To assist with Action T-2: “Expand Active Transportation and Shared Micromobility Network,” we suggest including financial incentives for the purchase of personal electric micromobility devices or subscriptions to micromobility device-sharing networks as a potential policy strategy.
- Page 121-122. T3: “Private Vehicle Electrification...” strategy does not clearly address medium- and heavy-duty vehicles, which have been a major factor driving the overall growth of on-road transportation sector emissions. More background context information and specific strategies for electrification and fuel efficiency improvements of medium- and heavy-duty vehicles are needed.
- Page 123. We are supportive of Action T-4: “Congestion Pricing and Limiting Cars in Urban Areas.” However, these two policies will be incredibly politically challenging. In the short-term, we implore the county to first consider policies to stop subsidizing parking, including by pricing parking at the market rate. The county should also remove minimum parking requirements for new development and encourage developers and landlords to price parking separate from leases and condo sales. Additionally, it should be clarified that congestion pricing should be applied to existing lanes, rather than adding highway lanes to do so.
- Page 127. Strengthen T6: “Electrify County and Public Agencies Fleet” by also addressing types of vehicles (e.g., sedans instead of SUVs) and use of fleet vehicles (reducing use when alternatives are available). See the City of Alexandria draft Alternative Fuel Fleet Policy for an example.

- Page 130-131. Action T-8, “Transportation Demand Management and Telework Strategies,” should reference parking and commuter benefit cash-outs as a policy best practice. The level of specificity used for county government staff transportation demand management (TDM) in G- 13, page 189 is good and should be adapted for the community-wide TDM strategy.
- Key questions that the CAP needs to clearly answer are:
- What market conditions and levels of incentives are required to achieve the EV adoption targets of 85% by 2027 and 100% by 3035?
- Does the mode shift strategy include increased telework? If so, what is the assumed future rate of telework and what is the current baseline rate for comparison?
- Are walking trips unintentionally left out of the target to double the proportion of bus, rail, and bicycle trips?

Sincerely,

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Maryland Advocacy Manager  
Coalition for Smarter Growth

CC:           Montgomery County Executive Marc Elrich  
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