February 26, 2021

Thank you for the opportunity to provide comment on the draft countywide Climate Action Plan. Staff from across the M-NCPPC - Department of Parks have reviewed the draft plan and have provided the enclosed comments. The comments have been organized beginning with a section on general comments which include anything not tied to the content of a specific action or recommendation. This may include process clarifications, grammatical and typographical notes, or other general comments. Following this section, the comments have been organized by sector and recommended action.

Staff have offered to provide additional review of the Climate Action Plan (CAP) prior to the release of the final document, particularly in the topic areas of vegetation, forests, tree canopy, and habitat. Feel free to reach out and utilize the technical expertise of our staff for this review. Please contact Amanda Aparicio, Acting Assistant Chief, Facilities Management Division (███████████████████████████████████) with any questions or to solicit further feedback from our staff as the CAP is finalized.

General Comment

Action	Comment
N/A	While the implementation of the various recommendation items might differ from action to action, suggest additional language that speaks to the approach that will be taken to support implementation over the next few years.
N/A	The connection between land use and climate impacts needs to be explicitly stated and these impacts should be considered in land use planning decisions. This can be addressed in the section of the document dedicated to Thrive Montgomery.
Page xiv	Under Transportation, the second bullet says "Electrify vehicles…" Suggest modifying this language because "electrify vehicles" suggests a conversion of gas vehicles to electric rather than replacement of gas-fueled vehicles.
Page xiv	Under the Carbon Sequestration section, remove the word "its" where it says "Montgomery County has preserved and enhanced its nature-based solutions…"
Page xiv	Public Engagement, Partnerships, and Education sector: under the second bullet, suggest wording change to say "create strong state climate policies" or "strengthen state climate policies" rather than "result in ambitious state climate policies."
Page xiv	At the top of the page, suggest writing out GHG Mitigation to Greenhouse Gas Mitigation since there is space for it.
Page 85	In the Climate Risk Reduction section, replace period with colon where it states "Climate hazard the action addresses"

Page 193	The first paragraph in the Public Engagement, Partnerships, and Education section might be better formatted as a bulleted list.
Action	**Comment**
Page 195	The first paragraph in the Public Engagement, Partnerships, and Education section might be better formatted as a bulleted list. Typo identified. M-NCPPS should be MNCPPC.

Clean Energy

Action	Comment
No Comment	

Buildings

Action	Comment
B-1: Electrification Code Requirements for Existing Commercial and Public Buildings	Given the wide range of facility types on M-NCPPC parkland, including everything from historic structures, to LEED buildings, large buildings like ice arenas, tennis facilities and community centers, as well as smaller buildings/structures and both public and private facilities, M-NCPPC - Department of Parks would like to be added as a contributor to this action. Given our unique/diverse inventory of buildings/structures, staff may have a lot of useful experience and perspective to share on this topic. Additionally, it will be important to consider feasibility, including financial and available technology at the time of new code implementation given the wide variety of building types county-wide and the diversity of services provided.

B-7: Net Zero Energy Building Code for New Construction	In the past, M-NCPPC has been included in discussions related to the IgCC and as the County moves toward new-zero building energy code, the M-NCPPC - Department of Parks would like to ensure inclusion on this subject. Similar to the comment provided for B-1, staff in the Department of Parks have excellent experience and perspective working with a diverse portfolio of building and structure types which will provide insight into how to best achieve the goals under this recommendation. Also in-line with the comment on B-1, it will be important to consider feasibility, including financial and timing of available technology at the time of new code implementation given the wide variety of building types county-wide and the diversity in services provided.

Transportation

Action	Comment
T-2: Expand Active Transportation and Shared Micromobility Network	On Page 120, after the line, "To achieve its goals, the County would need to rapidly implement its Bicycle and Pedestrian Master Plans as well as Vision Zero transportation safety initiatives….In other portions of the CIP, the County could prioritize bicycle infrastructure and trail projects to complete gaps and connect existing networks." we could suggest adding "To this end, Montgomery Park's Countywide Park Trails Master Plan could be updated and implemented to better integrate park trails into the County's transportation system." This is consistent with the direction of the General Plan (Thrive) and the upcoming PROS Plan.
T-2: Expand Active Transportation and Shared Micromobility Network	Broad themes that are being focused on at M-NCPPC - Department of Parks that are supportive of this recommendation include: Connecting park trails to other jurisdictions (i.e. neighboring counties and the District of Columbia), enhancing our current trails though maintenance, wayfinding, and amenities such as bike racks and fix-it stations, and extending existing trails and adding connections (i.e. trail heads and trail spurs) to neighborhoods and activity centers.

T-6: Electrify County and Public Agencies Fleet	As technology has allowed, M-NCPPC has been committed to expanding its fleet portfolio to include hybrid and electric vehicles. It will be important to consider the wide variety of vehicle and equipment types used in County and Public Agency Fleets and ensure that, as requirements are developed, there is available technology in the electric sector to meet the operational needs of the agency. For example, at present, there are many vehicle/equipment types that do not have electrified options. A good example of a specialized vehicle type that doesn't have an electrified option on the market are miniature trains (e.g. Wheaton and Cabin John Recreation Parks).
T-6: Electrify County and Public Agencies Fleet	We concur that we need staff training on use and maintenance of electric vehicles and equipment. We would need to prioritize this in our department-wide training plan and budget.
T-8: Transportation Demand Management and Telework Strategies	M-NCPPC updated its telework policy on 2/5/2021 which, among other improvements, simplifies the employee request/management approval process, includes training for teleworkers, and describes the benefits of teleworking.

Carbon Sequestration

Action	Comment
S-1: Retain Forests	Actions regarding supplemental planting as a strategy for forest retention/protection should focus on being very strategic in implementation - planting only where appropriate and in a manner that aligns with the habitat classification qualities and description for the particular area. Doing so will maximize successful planting and long-term survivability which will positively impact carbon sequestration.
S-1: Retain Forests	It will be important to be mindful of successful regeneration and succession. For example, non-native invasive (NNI) management in forests where natural or artificial regeneration is unlikely is deleterious. If NNIs are cleared of an area and trees are planted in their place, if the conditions, be that soil condition or other factors, cannot support establishment of said trees, they won't survive and provide for carbon sequestration. However, the NNIs that were removed were providing sequestration service, at least on some level, prior to being cleared for the planting. Given this example, the CAP language should address the issue of forest retention in a way that recognizes

	the potential need for significant site prep work, long term maintenance investments, etc., to ensure planting success/survivability.
S-1: Retain Forests	Regarding enhanced biodiversity and forest retention; a goal would be natural regeneration, however where we have supplemental planting, while we can plan more easily for species diversity within what is planted, establishing structural diversity (e.g. age/size of planted trees/vegetation) is far more challenging but an important factor in promoting biodiversity. The CAP should strengthen language regarding protection of our existing biodiverse areas as being critical, and reestablishment of lost biodiversity as incredibly challenging. Protecting the quality of our existing resources should be widely recognized as an important strategy for promoting sequestration.
S-1: Retain Forests	Provide resources to maintain existing individual trees in developed areas of urban forests including preventative tree maintenance programs that are for the purpose of maintaining trees in developed areas. Programs needed include pruning programs that are on established cycles to keep urban trees and trees in developed areas healthy and sustainable as a long-term part of the green infrastructure in the County.

Action	Comment
S-1: Retain Forests	Provide resources to maintain newly planted trees beyond the first and second year to after planting on parkland so that every tree is maintained through pruning, pest management, and mulching on a regular cycle for long-term sustainability in the landscape.

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S-1: Retain Forests	Provide resources for mulching trees in parks to reduce labor string trimming around them and increase the health and long-term sustainability of trees in the landscape.
S-1: Retain Forests	Additional resources are needed to plant large balled and burlapped trees to replace trees lost due to pests, diseases, and climate change in developed areas of parkland.
S-1: Retain Forests	Additional resources are needed to water and provide care (mulch, deer protection, pruning) to containerized reforestation trees planted on parkland.
S-1: Retain Forests	M-NCPPC - Montgomery Parks has a green waste recycling program where we repurpose plant debris into useable landscape products such as seasoned wood chips, compost and firewood. We also have a sawmill to create wood products for use in parks. There is more waste that could be recycled, but we don't have the labor or resources to continue to enhance the program further.
S-2: Increase Tree Canopy	Develop a Countywide tree vulnerability assessment of developed and forested areas to develop guidance on tree species suitability and adaptability based on local climate change predictions. This will help guide decisions about tree planting and maintenance amongst jurisdictions. The Urban Forestry Climate Change Response Framework is an example that has been used in other cities to develop such an assessment. (https://forestadaptation.org/focus/urban-forests). Involve all public agency urban forest managers in this process so it can be implemented across the whole County.
S-2: Increase Tree Canopy	Explore M-NCPPC's new equity focus area (EFA) map of tree canopy and how this impacts various communities across the county.
S-2: Increase Tree Canopy	Provide resources and access to public regarding tree inventory and/in multi-language options.

Action	Comment

S-2: Increase Tree Canopy	Planting projects should be vetted through tree inventory data sources so placement is addressing the needs of tree cover.
S-2: Increase Tree Canopy	Plant demonstration areas and provide signage to engage and educate public on benefits of creating habitats and functioning landscapes.
S-2: Increase Tree Canopy	Additional resources are needed to help get larger balled and burlapped trees planted in qualifying open space, in landscaped managed areas and around amenities.
S-2: Increase Tree Canopy	Use equity focused areas (EFA) to prioritize adding new trees or enhancing tree maintenance; provide community engagement through a seasonal position that focuses on citizen science, preserving tree canopy, and working with the culturally-rich populations of the county.
S-2: Increase Tree Canopy	Native-pollinator friendly comment should be in another area unless this is referring to native trees vs. native plants, shrubs, pollinator friendly plants.
S-2: Increase Tree Canopy	M-NCPPC - Montgomery Parks has a tree inventory of all trees in developed parks that is accessible to the public via our website, Montgomeryparks.org/trees. The inventory is on the Davey Treekeeper platform and features environmental and health benefits from individual trees.
S-2: Increase Tree Canopy	M-NCPPC - Montgomery Parks is working on diversifying our planting plans based on current tree diversity at individual parks so we can manage pest and disease populations better when they arrive.

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S-3: Restore Forests, Meadows, and Wetlands	The language in this section suggests that the County should establish the long-term plan for restoration of forests, meadows, and wetlands in all County Parks and lands not required for other uses. The term "County" is not assigning responsibility appropriately or accurately. Additionally, MNCPPC is responsive to and carries an ethic of providing a balance between the need for environmental and sustainable stewardship of public lands with providing amenities and opportunities for active and passive recreation on parkland. Forests, meadows, wetlands, and streams are the principal components of the natural areas that comprise our park system and carry a deserving, yet disproportionate responsibility in providing critical ecological goods and services for the County. Meeting the CAP goals while still attempting to strike this balance may present significant challenges and a need to assess tradeoffs for various actions.

Action	Comment
S-3: Restore Forests, Meadows, and Wetlands	Regarding forested riparian stream buffers; language should state "established where sustainable", and be softened to "planted", i.e. treespecific regeneration and success is not sustainable in many flood prone areas but there may be other options for planting these spaces. A focus on language that is considerate of plantings that will survive is important.
S-3: Restore Forests, Meadows, and Wetlands	Regarding supplemental planting of forested areas; it should be noted that if not carefully planned, artificial planting may be unwarranted and more disruptive to a site.
S-3: Restore Forests, Meadows, and Wetlands	Despite the title, this section does not address the importance of wetlands for their carbon storage capacity and their function as a natural carbon sink, the overall value of these habitats to the biodiversity of the county, additional ecosystem services provided, existing threats and past land use impacts, opportunities for restoration, etc. Wetlands should be addressed in a similar way as Forests and Meadows are in the narrative. Parks has an extensive program for riparian enhancements with microtopography and native plantings, which often result in wetland formation. FY21 projects are underway and we expect to continue this annual program going forward.

S-3: Restore Forests, Meadows, and Wetlands	Section identifies riparian and stream buffers as a priority for reforestation. The most significant and meaningful opportunities to meet this goal exist in certain land use types, such as agricultural, roadside, residential, institutional, industrial. Stakeholders in these sectors should be identified and incentivized accordingly. Parks riparian enhancement and stream restoration projects include robust plantings, including native trees, that are geared towards enhancing buffers. This comment also could be applied, in part, to Action S-4 Regenerative Agriculture.
S-3: Restore Forests, Meadows, and Wetlands	Planting projects in developed areas of parkland should use native species to the extent available and possible, while highly considering diversity of species in the landscape already and species that will adapt to the County's changing climate. The availability of native species in larger sized trees is not optimal.
S-3: Restore Forests, Meadows, and Wetlands	At M-NCPPC – Montgomery Parks we have a difficult time recruiting and hiring certain positions such as tree climbers. Develop and fund an apprenticeship program for training and recruiting new climbers to the industry.

Action	Comment
S-3: Restore Forests, Meadows, and Wetlands	Establish more long-term aftercare to help reforestation plants endure deer pressure and being overtaken by weed/NNI growth.
S-3: Restore Forests, Meadows, and Wetlands	Plant more layers of understory plant material to help meet the eventual generation gap that will occur when mature trees age out and are lost.
S-3: Restore Forests, Meadows, and Wetlands	Decrease spacing of newly installed plant material for wetland areas, stormwater management to out-compete weed/NNI growth and help provide less maintenance in the long run.
S-3: Restore Forests, Meadows, and Wetlands	Plant mini-tree communities where areas are planted closer together and mulched and maintained versus traditional spacing to help encourage longterm growth as it is proven that trees form symbiotic relationships with each other in development.

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S-4: Regenerative Agriculture	Regarding the line, "The County will particularly need to incentivize the rebuilding of healthy soils in the County's Agricultural Reserve, using transferable development rights, and in the Conservation and Stream Valley Parks": This may be focused on targeting existing Agricultural Leases within our Stream Valley and Conservation Parks, but the language is not 100% clear. The potential for soil replacement in county park Stream Valleys and Conservation Parks is something M-NCPPC would need more info on the intent and specs. M-NCPPC did do some conservation/enhancement work along with the agricultural areas of Bennett Creek Park a few years ago, so there is some background to be shared if this recommendation remains in the CAP.
S-4: Regenerative Agriculture	There is no mention of cover crops, no mention of partnership with research, no mention of rotational grazing practices or implementing incentivized no-till planting systems for farmers.
S-4: Regenerative Agriculture	No mention of farmers of color in the county either or increasing the number of farmers of color in the County.
S-4: Regenerative Agriculture	No mention of partnerships through the Food Council or additional support to the Office of Agriculture who has 1.5 staff members.
S-4: Regenerative Agriculture	This portion should include current projections for this region becoming a very lucrative farming and agriculture area due to climate change.

Action	Comment
S-4: Regenerative Agriculture	Potentially include references to the "What Our Region Grows" report from MWCOG.
S-4: Regenerative Agriculture	Work with local farms who lease property on M-NCPPC parkland to help maximize sustainable efforts of land management to complement their farming practices.
S-4: Regenerative Agriculture	Secure funding to help farmers on M-NCPPC leased property build quality soils where necessary.

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S-4: Regenerative Agriculture	Provide resources to plant borders of farmed land with banker plants and other plant material that will help with pollination, habitat, discourage wildlife damage to more desirable areas and filtration of water.
S-4: Regenerative Agriculture	Work with M-NCPPC leased land to make sure they are maximizing crop rotations and evaluate the potential end use crops to benefit communities.
S5-Restore Soil Fertility, Microbial Activity and Moisture-Holding Capacity	Suggest a convert Your Lawn Campaign or Donate Your Lawn for a Food Project.
S5-Restore Soil Fertility, Microbial Activity and Moisture-Holding Capacity	Protect large areas of native soil similar to how trees are protected, with fencing and do not enter signs, when developing and renovating parks.
S5-Restore Soil Fertility, Microbial Activity and Moisture-Holding Capacity	Enhance the M-NCPPC – Montgomery Parks green waste recycling program to be able to offer more compostable products.
S5-Restore Soil Fertility, Microbial Activity and Moisture-Holding Capacity	M-NCPPC - Montgomery Parks has a native plant program where seed is collected from local ecotype species that are propagated and planted into Montgomery Parks. Expand the program.
Action	**Comment**
S-6: Whole System Carbon Management and Planning	Biodiversity benefits associated with carbon management: It will be important to focus on and consider effects on biodiversity, as there are likely some negative impacts that will result of some CAP actions.

S-6: Whole System Carbon Management and Planning	Promote tree care jobs in parks through funding of apprenticeship programs for tree planting, tree care, tree pruning, tree climbing/methodology to establish connections with groups experiencing unemployment locally.
S-6: Whole System Carbon Management and Planning	Agree, prioritization of planting areas with less cover/vulnerable communities, equity focused area (EFA) maps.

Climate Adaptation

Action	Comment
A-1: Water Infrastructure Resilience	Aging sewer infrastructure from the boom of local suburbanization is rapidly coming to the end of its service life and is having a negative impact on existing natural resources as it degrades in place. This should be either incorporated into this action or added as a stand-alone action. It will require significant public investment to maintain and serve county residents into the future, while also protecting park stream valley resources where much of this sewer infrastructure exists. Parks has an extensive program with WSSC to restore stream channels as part of their asset protection program, and we contribute survey, construction details, and design services to facilitate these projects.
A-2: Culvert Repairs	This action should be expanded to address repairs to aging/failed stormdrain outfalls or this sector of the CAP should include a separate action that deals specifically with stormdrain outfalls.

Action	Comment

A-2: Culvert Repairs	In addition to the storm drain infrastructure repairs, this action also needs to highlight the need to repair the downstream channels/outfalls at the receiving end of this infrastructure, which have become destabilized and blown out as a result of both failing infrastructure as well as what has come to be under-sized conveyance systems. M-NCPPC – Department of Parks has an extensive program with MCDOT to restore degraded outfall channels as part of their asset protection program, and we contribute survey, construction details, and design services to facilitate these projects. We have even facilitated a partnership between WSSC and MCDOT to combine efforts where outfalls impact water/sewer infrastructure. M-NCPPC – Department of Parks also has our own outfall restoration program, which we often tie into the riparian enhancement projects.
A-2: Culvert Repairs	Where appropriate, culvert replacements need to incorporate measures (i.e. natural bottom bridges and arches, backwatered culverts, low-flow channels with appropriate depth, baffles, fish ladders, etc.) that promote ecological connectivity within these systems, eliminating fish blockages and re-connecting upstream resources and ecosystem functions that have been cut off or disrupted by these crossings. The M-NCPPC – Department of Parks has an extensive program with MCDOT to restore degraded culverts to be environmentally sensitive crossings as part of their asset protection program, and we contribute survey, construction details, and design services to facilitate these projects. The M-NCPPC – Department of Parks also has a culvert/bridge restoration program, which we often tie into the riparian enhancement projects.
A-8: Harden Emergency Shelters and Install Resilience Hubs	The M-NCPPC - Department of Parks intends to create a resiliency plan to improve the ability of park and recreation facilities and natural resources to withstand the effects of climate change. Structural facilities could then be more easily tapped for sheltering/resiliency hub use.
A-8: Harden Emergency Shelters and Install Resilience Hubs	Not only do parks foster social connectedness, but they can act as a community hub during natural disasters and other emergencies to be a focal point for emergency response. Large open spaces (like parkland areas) should be considered for certain climate-related emergencies/disasters, as appropriate.

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Action	Comment
A-9: Mold Protection and Remediation	The M-NCPPC - Department of Parks has a lot of experience with a variety of rental housing types, maintenance and stormwater management. As such, the M-NCPPC Department of Parks should be considered as a contributor in discussions about Mold Protection and Remediation. This recommendation in the draft CAP does have positive intentions that may provide protection to human health. There may be some unintended consequences of regulation in this area which should be considered and addressed. First, an economic analysis should be conducted as rental property maintenance costs are already high, and revenue dollars are increasingly strained. Depending on how regulations are formulated in this area, there may be significant impact to rental housing and affordable housing inventory if plans add significant costs to landlords/property owners. This could result in decreased availability of rental inventory county-wide. The language in the recommendation and/or any proposed regulations needs to address the fact that current rental housing inventory in Montgomery County is not all typical. There are very old, historic properties, many with stone foundations which are susceptible to water intrusion that may lead to mold or fungal growth. As it stands, mold is not regulated and while all mold complaints are very serious, they can stem from many issues including but not limited to: tenants not maintaining important elements of the property (e.g. gutters), tenant lack of reporting of water leaks or intrusion, poor operation of HVAC/ventilation systems or lack of good housekeeping. Additional requirements on landlords to prevent basement flooding will not prevent damp/wet basements. Nuisance water intrusion is subjective and could come from anywhere, including uncontrollable ground water.
A-10: Green Infrastructure	Installing pervious concrete should not be promoted as a good example/measure to advance this action. Pervious concrete is one of the least effective BMP's in mitigating extreme precipitation events and the industry is moving away from these kinds of implementations due to the cost and burden of long-term maintenance and reductions in performance over time. Bioretention facilities might be a better practice to highlight as a meaningful green infrastructure practice.

A-10: Green Infrastructure	Revisit zoning use codes with M-NCPPC to expand certain uses that combat climate change.

Action	Comment
A-12: Stormwater Retention Credit Trading	Any program that is created must ensure that credits applied are relevant to the area where the triggering impact is located. Our most urbanized watersheds are severely impaired and will not improve unless we can provide meaningful treatment in areas that are also the most constrained. Recently, we have been able to get MCDPS to allow us to do Outfall Restoration instead of formal SWM facilities where space is limited. This is a win-win as we often end up treating more area and there are less operational costs.
A-13: Ban Stormwater Management Requirement Waivers	There are and will continue to be instances where stormwater management solutions are more impactful to the surrounding resources and receiving waterways than leaving areas of impervious untreated. There needs to be a balance in this regard and a stormwater value placed on these resources. We often see projects (i.e. Montrose East and ICC) where the addition/enhancement of SWM treatment causes significant tree loss, which creates a SWM versus tree scenario. Additionally, sometimes structural BMPs and/or Outfall rehabs are better in capturing the polluted stormwater.
A-13: Ban Stormwater Management Requirement Waivers	Unclear as to the intent or purpose of the discussion around a grandfathering provision is in this context. How does this relate to future work? Is this action proposing that the existing provision should be extinguished?
A-13: Ban Stormwater Management Requirement Waivers	Requiring a stormwater permit for minor land-disturbing activities may have unintended consequences. For example, the M-NCPPC – Department of Parks' MS4 commitments already require us to consider E&SC and SWM with projects under 5,000 SF, so adding regulatory review to these projects would divert CIP $$ from actual restoration work, as we would need to pay consultants to get permits for work we would do anyway.

A-13: Ban Stormwater Management Requirement Waivers	This section needs to have more of an emphasis on impervious minimization. For example, since M-NCPPC's first MS4 permit, we have committed to trying to minimize impervious areas for projects, and we use that commitment to make comments on Park Permit applicants who outfall onto Parks. Many existing parking lots built in the 60s – 90s have larger spaces and wider drive aisles than necessary, so we always look to reduce the pavement widths with our PLAR renovations. This has the dual benefit of increasing greenspace and reducing SWM needs.

Action	Comment
A-14: Update Floodplain Maps	This is something M-NCPPC - Department of Parks really needs to participate in because M-NCPPC manages the Stream Valley Parks where most of the floodplains exist. In all likelihood the floodplains would be enlarged with any update, which would show more of Park amenities and infrastructure to be within the floodplain. This may not be a big problem for renovating existing facilities, but it would certainly limit new development (which is in line with our current practices). It would be useful to have consistent floodplain modeling throughout the County, but this would require a lot of funding.
A-15: Water Supply Protection	Stream corridor revitalization efforts should also include stream restoration to meet the pressures of the County's developed and developing watersheds.
A-15: Water Supply Protection	Robust, long-term ecological monitoring of our waterways must be a central component of any expectations to maintain or preserve natural resources as it provides a basis to track fluctuations in specified components of the environment and allow for an opportunity to evaluate the appropriateness of management regimes and scenarios for achieving sustainability goals.

A-15: Water Supply Protection	The vast majority of Montgomery County water comes from the Potomac Intake and Filtration Plant on River Road, and water quality at the intake is heavily impacted by upstream conditions of Watts Branch, which enters the Potomac only ~1,800 feet above the intake. Seneca and Muddy Branch also enter the Potomac upstream, but they are further away, so there is greater mixing with Potomac water before hitting the intake. WSSC spends millions of dollars to remove sediment and pollutants from the intake water that is carried by runoff from developed areas within Watts Branch Watershed and streambank erosion. Investments in protecting our water source and restoring our Stream Valley Parks will reduce reliance on physical/chemical removals at the Filtration Plant and associated disposal costs.
A-16: Flood Rescue Resources	The acronym POL should be more clearly defined. In the list of acronyms, it just lists "Police Department" and it isn't clear whether that means all jurisdictions or just County Police. With regard to Flood Rescue Resources, if there will be an assessment and increase in first-responder resources, part of that assessment should include which jurisdictions already participate in flood rescue, and/or to what degree. If some jurisdictions within the County are not performing or supporting these rescues, this assessment should look at whether there is a need to train and coordinate across jurisdictions to provide for more response capability. Resources for training and equipment should be planned accordingly.
Action	**Comment**
A-18: Expanded Community Gardens	Growing food and building community capacity are the primary functions and goals of community gardens. Being exposed to nature, improved eating habits, improved mental health, physical activity are all added bonuses.
A-18: Expanded Community Gardens	There are now 12 community gardens, one was recently added this season.
A-18: Expanded Community Gardens	Suggested Language: "The county should create and promote more community gardens as one way to combat food insecurity in the county. By expanding the number... more county residents would have a way to feed themselves and their families, increased connectivity with community, increased connection to nature, fresh and local food, increased affordability, lower food insecurity, and a potential source of income."
A-18: Expanded Community Gardens	The term "food desert" is becoming obsolete and has negative implications, especially for communities of color.

A-18: Expanded Community Gardens	Implement a sliding scale system for low-income residents.
A-18: Expanded Community Gardens	A plan should be developed for anticipated growth of the community garden program that includes resources and full-time staff – the program is at capacity now and has been for multiple years.
A-18: Expanded Community Gardens	Establish a land bank for residents to establish community gardens so residents feel empowered to create their own food growing projects or gardens in urban and suburban areas.

Climate Governance

Action	Comment
G-1: Build Awareness among All Montgomery County Government Staff about Climate Change	Partnering with the County's Climate Change Academy would be beneficial for M-NCPPC staff to build awareness around climate change and understand positive actions they can take in- and outside the workplace.
Action	Comment
G-2: Establish a Climate Change Academy to Integrate Climate Change Training into the Professional Development of Montgomery County Government Staff	Suggest adding more specific language about the types of training topics that might be covered as it pertains to direct actions staff can take to make an impact on climate change. Perhaps language should be added suggesting tailoring of training for different types of job specifications. Partnering with the County's Climate Change Academy would be beneficial for M-NCPPC staff to build awareness around climate change and understand positive actions they can take in and outside the workplace.

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G-3: Incorporate Climate Competencies into Montgomery County Government Job Descriptions and Performance Plans	Agree.
G-9: Incorporate Climate Considerations into the County's Budgeting Processes	Consider including ROI-type analyses.

Public Engagement, Partnerships, and Education

Action	Comment
No Comment	