

## Montgomery County Climate Action Plan Public Comments

### Executive Summary, Definitions, Acronyms, Vision, Principles, Background Section & Thrive 2050

CAP Section	Comment Themes	General Responses/How to Address	Applies to
Global	Describe the sequencing of actions, timeline of actions, and interconnections among actions. Describe how CAP actions will be turned into actionable policies/implementation process	Updated the sector introductions to provide more detail, to the extent available, about interconnections between actions/how different actions relate to each other. Added more description about the annual climate work plan, which will serve as a companion to the CAP. The annual work plan will include the County's commitments to efforts that will be undertaken in the upcoming year, including the available resources and staff capacity for these efforts.	Climate Actions; G-11; Looking Forward
Global	Provide more detail on action descriptions	Provided additional details on actions, when available, but note that the actions are described at a strategic level. The annual work plan will provide more detail on action implementation. For Governance and Public Engagement actions, added the estimated cost to implement and stage of implementation.	Climate Actions
Global	Analyse sub-actions for cost, priority, impact, co-benefits,	It was not feasible to conduct this level of analysis at the sub-action level.	
Global	Scale up what the County is already doing	Added language to emphasize the existing work that will be scaled	Climate Actions
Global	Evaluate the effectiveness of existing programs	Added reference to CountyStat, the County's performance management and data analytics team, in assisting with identifying evaluation approaches.	G-11

Executive Summary & Global	Discuss systemic changes needed; provide a framework for a systems approach to decision making.	Added language to highlight the magnitude of the change and the challenge, as well as the need to ensure democratic principles are upheld; the tension between the urgency and the sweeping change that is necessary. The Climate Leadership Team will provide strategic guidance on action implementation and explore different models for facilitating and coordinating action.	Executive Summary, G-12
Global	Discuss how to build in more flexibility into the plan if some actions don't pan out; explain how we will amend the plan as needed; scenario analysis; "Plan B" for actions.	Added details about the annual climate work plan structure. The annual climate work plan will enable the CAP to be a living document and provide the County with the opportunity and flexibility to course-correct and make adjustments to actions over time, as technology evolves and additional funding becomes available, as well as any adjustments needed to CAP actions.	G-11, Looking Forward
Global	Provide cost estimates: Don't undervalue nature-based solutions; Include the cost of inaction; include the social cost of carbon; include the cost to residents	Identifying the exact costs and funding sources across all CAP actions is not possible due to current data limitations, which will need to be addressed during action implementation. Added language to the Sequestration section intro about the value of nature-based solutions. Added information on the cost of inaction on climate change. Clarified that the assessment of initial investment required to implement each CAP action refers to the upfront costs that are beyond any currently secured or identified funding. The cost assessment does not attempt to estimate the economic impact at the scale of individuals and individual businesses. Developing more precise and fine-grained cost assessments would require additional data inputs and would also depend on the manner in which the action is designed and implemented.	Sequestration; Paying for Climate Action Implementation; CAP Action Introduction

Global	Municipalities and Montgomery College have a bigger role to play in the CAP and implementing climate action	Added municipalities and Montgomery College as contributors to additional CAP actions.	Public Engagement, Governance, Climate Adaptation
Background	Regional context for climate action needs to be explained; concern that the County will be at an economic disadvantage from leading on climate.	Added a description about climate action in the DMV region. The County is not the only jurisdiction in the region that is moving aggressively to reduce emissions.	Background
Background	Include more lessons learned from COVID-19	Created a call-out box that describes the similarities between COVID-19 and climate change; added a discussion on the impacts of the COVID-19 pandemic on transportation choices	Background, Transportation
Executive Summary & Global	Be technology neutral	Added language about the need for flexibility in CAP implementation; CAP actions may evolve in the future to take advantage of changes in technology. Added language to clarify that zero emission vehicles may also include hydrogen fuel cells.	Executive Summary, Transportation, Clean Energy
Background	Provide more background on the climate crisis	Added information on the projected impacts of 2 degrees C of warming versus 1.5 degree C of warming.	Background
Executive Summary & Global	Develop a companion summary document to capture the key points of the CAP	Expanded the Executive Summary to more clearly describe the key points made in the CAP. Provided a description of what the CAP addresses and what it does not address. Added a description of how to read the CAP, including a summary of topics covered in each chapter of the CAP. Brief fact sheets about climate action will also be developed and translated into multiple languages.	Executive Summary
Executive Summary & Global	Provide a broader vision statement imagining what life would be like in 2035 and the transformative changes needed.	Updated aspects of the vision statement in response to comments received. Added language about the systemic changes needed to tackle climate change.	Vision, Executive Summary

## Racial Equity & Social Justice

CAP Section	Comment Themes	General Responses/How to Address	Applies to
Racial Equity and Social Justice	Add health related data, including the social determinants of health, showing how climate hazards disproportionately impact BIPOC community members.	Data from the County's Zip Code Report, which reveals significant health disparities by zip code, have been added.	
Public Engagement	Community engagement on the part of County Government should be an equal, multiple-party exchange with the government willing to learn as well as teach; solutions should be based on residents' lived experiences, needs and interests, and speak to their day-to-day life challenges. Most importantly, community engagement should not be transactional but rather a process of co-creation in which community members are regarded as authentic partners and collaborators.	New action, P-6, was added: Community Justice Academy in which Graduating Community Ambassadors Representing their Neighbors Conceive and Co-create Integrated Health, Equity and Quality-of-Life Solutions Directly Applicable to their Communities. The central thrust of this action is about power sharing and the co-creation of community based solutions.	
Racial Equity and Social Justice	Place greater emphasis on the importance of using a health frame when engaging community members, including in the CAP itself.	Added a CDC graphic in Racial Equity and Social Justice section focused on the linkages between health and climate change and how climate change exacerbates inequities and health disparities.	

Racial Equity and Social Justice	Racial equity measures will cost money so the County must consider new sources of revenue.	In the "Paying for Climate Action Implementation" section, the example of Portland, Oregon's Clean Energy Community Benefits Fund is referenced, as it is specifically designed to fund climate action that advances racial equity and social justice.	
Racial Equity and Social Justice	Acknowledge that social vulnerability is compounded by multiple characteristics (e.g., low income, lack of health care, etc.).	Interconnections are made more explicit in the Racial Equity and Social Justice section.	
Racial Equity and Social Justice	It is misleading to single out Silver Spring as a sundown suburb since racial covenants were common in the down-County area.	Text was modified to convey that sundown suburbs existed more broadly.	
Racial Equity and Social Justice	Make more explicit the connection between food security, resiliency and sequestration.	A call out box was created in the Sequestration section, highlighting the co-benefits and complementarity.	
Racial Equity and Social Justice	Make clearer the bullets in the "Highlights from Community Conversations" section.	Highlights were synthesized and organized by themes.	
Racial Equity and Social Justice	Provide a map showing areas of highest traffic vs. neighborhoods of low income and BIPOC communities.	Six new maps have been added, highlighting areas with high traffic proximity, as well as high Air Toxics Respiratory Hazard index values, in BIPOC and/or low income communities.	
Racial Equity and Social Justice	The CAP should mention the impact of climate refugees on the county.	A call out box on Climate Migration was added to the Climate Vulnerability section.	

Racial Equity and Social Justice	Shorten and better highlight conclusions in the Racial Equity and Social Justice section, particularly as it relates to Housing and Homeownership and Transportation.	Call out boxes highlighting Implications and Considerations were created.	
Racial Equity and Social Justice	Include a clear statement that generally those who have contributed least to the climate problem are suffering the greatest consequences, both here in the United States and throughout the world.	Text was added that makes this explicit, along with reference to a University of Leeds Sustainable Research Institute study that found that the top 10% of the global population consumes 20 times more energy than the bottom 10%, primarily as a result of more flying and driving.	
<b>Climate Conditions &amp; Climate Adaptation Actions</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Adaptation	Need to emphasize that stormwater management systems to meet or exceed current standards.	Added language to implement a review process by which stormwater management infrastructure is evaluated to meet or exceed current standards when infrastructure is exposed for repairs or reconstruction	A-1, A-2
Adaptation	Need to emphasize natural solutions instead of synthetic turf	Added language to signal the County's preference for natural solutions such as organic grass (as opposed to artificial solutions such as synthetic turf)	A-10
Adaptation	Need stricter local requirements for stormwater management	Added language to explore whether there is a need to implement stronger requirements than the State's MS4 Permit	A-10
Adaptation	Expand to include outfalls where discussing Culvert repairs and to control stormwater at its source to extend the useful viability of culvers.	Changed A-2 action name to be inclusive of systems, including outfalls. Added language to include outfalls where culverts are mentioned. Added language to encourage management of stormwater onsite to reduce runoff. Added language to recommend the County develop a portfolio of methods to address stormwater runoff.	A-2, A-13

Adaptation	Culvert repairs and replacements should consider ecological connectivity to ecosystem functions that have been cut off or disrupted by these crossings.	Added language to be mindful of the natural ecosystem as well as regulatory requirements related to potential impacts to 100-year floodplain elevations for downstream properties.	A-2
Adaptation	Temperature Monitoring and alerts should also include air quality.	Added language to include air quality alerts and communications	A-3
Adaptation	Include reference to invasive species	Added language to recommend the County updates the International Green Construction Code to require periodic review of site inventory and plants list. Added language to reference the State's Department of Natural Resources program for native and invasive species as this is what the County follows.	A-6
Adaptation	Concerns regarding limitations of roof space for competing requirements and needs	Added language to clarify that Green/Cool/PV roof code would most likely be implemented in commercial settings.	A-6
Adaptation	There are more opportunities for public greenspaces in addition to Green Streetscapes	Updated A-7 action to "Green Public Spaces" to be more inclusive of streetscapes and other public spaces. Language added to recommend that each new area master plan should address appropriate shading/cooling in public spaces to reduce the urban heat island effect. Language added as an equity enhancing measure to allow residents to submit a request to help determine the areas with the most need for green infrastructure.	A-7
Adaptation	Equity concern regarding trees not being replaced after their removal for repairs and construction	Added language for an equity enhancing measure for removed trees to be replaced by the entity that removed them for repairs/construction.	A-7

Adaptation	Consider additional uses for hubs, such as food resilience/distribution resources, during emergencies	Added language to explore various uses of Hubs. Included park land and other open spaces as potential options for hubs during emergencies.	A-8
Adaptation	Climate-Adapted "Building Code" was too restrictive	A-11 was retitled "Climate-Adapted Development Standards" to more broadly cover other infrastructure.	A-11
Adaptation	Ecological monitoring of our waterways must be a central component to maintain or preserve natural resources	Added language to reference the Department of Environmental Protection's and the Maryland-National Parks and Planning Commission's separate ecological monitoring programs	A-15
Adaptation	There should be additional financial support mechanisms for landlords/property owners who may have difficulty financing updates or to provide incentives for development of projects, such as community gardens	Added language to include financial support mechanisms/incentives	A-9, A-11, A-18
Adaptation	Incentivize sustainable local food productions, Expand urban farming opportunities, establish community composting	Out of scope for climate plan, but might be relevant for a potential food security report.	Adaptation section
Adaptation	Need to include information on mental health and climate anxiety	Added language on health implications from climate change, including mental health impacts.	Racial Equity and Social Justice
Adaptation	Address credit trading inequities	Equity-enhancing measure added to this action.	A-12
Adaptation	Differentiation of flooding sources needed	Added language to clarify that NFIP flood maps are related to riverine flooding.	A-11, A-20
Adaptation	In what order are the Adaptation actions?	Actions are ordered by risk reduction.	Adaptation section

Climate Conditions	Plan needs to address insect-born diseases, algal blooms, and health issues	Added language on health implications from climate change, including mental health impacts. Added language to clarify that the Plan does not include an analysis of ecological impacts, algal blooms in water bodies, or the spread of invasive species.	Climate Conditions
Climate Conditions	Further explanation needed for RCP 4.5 vs. RCP 8.5	Added language with a brief explanation of these two climate scenarios.	Climate Conditions
Climate Conditions	Improve design of several figures	Several graphics have been updated to include explanations, different/additional variables, location reference points.	Climate Conditions
Climate Conditions	Climate migration needs to be referenced	Added language to introduce and discuss climate migration.	Climate Conditions
<b>GHG Emissions</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
GHG Emissions	The Global Warming Potential (GWP) multiplier for methane is too low.	The inventories conducted by the Metropolitan Washington Council of Governments are consistent with all relevant community inventory protocols - ICLEI's US Communities Protocol and the Global Protocol - and have been third party verified to be compliant with the Global Covenant of Mayors for Climate and Energy Common standards (Reporting Framework and Guidance).	n/a
GHG Emissions	The CAP needs to provide more information on the assumptions and inputs for any modeling done.	The sections pertaining to CURB and ASAP have been rewritten to more clearly explain how these tools were used in the development of the CAP. The CURB wedge chart does not project emissions reductions from the CAP actions; it shows the reductions that are necessary in each sector, based on projected GHG emissions, to achieve the County's 80% and 100% reduction goals. The ASAP tool was used to determine <i>relative</i> GHG reductions from CAP actions, as well as assess co-benefits and feasibility of actions. Additional information has been added to the document to show the inputs used in the ASAP analysis.	GHG Emissions

GHG Emissions	The CAP does not provide enough quantitative analysis of the GHG reduction or carbon sequestration potential of the recommended actions.	Discussion was added regarding the availability of data to do detailed quantitative analyses of the emissions reduction potential of specific actions. For example, the lack of detailed building specific data prevents an accurate quantitative assessment of the impact of specific building measures (like replacing gas heating systems with electric heat pumps).	GHG Emissions
GHG Emissions	Consumption emissions need to be included in the GHG inventory and emphasis should be placed in reducing these emissions.	In several places in the CAP, it is noted that consumption-based emissions are not included in a typical community-based emissions inventory. Nonetheless, the County recognizes the magnitude of emissions associated with consumption and proposes community engagement focused on what individuals can do to reduce consumption related emissions as well exploring the magnitude and nature of consumption-based emissions to facilitate the development of additional actions to address this source of emissions.	GHG Emissions; Public Engagement, Partnerships, and Education Actions; What Can I Do
GHG Emissions	Sequestration actions should not be an offset to GHG emissions, and emissions offsets should not be considered.	Resolution 18-974 is clear the goal is to eliminate GHG emissions by 2035. However, it also calls for efforts to remove excess carbon from the atmosphere. The CAP contains recommended actions designed to achieve both of these goals. If carbon offsets prove to be an efficient mechanism to reduce GHG emissions, evaluating their use should not be ruled out.	n/a

### Clean Energy Actions

<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Clean Energy Actions	Address technology and grid reliability issues associated with a 100% renewable grid.	The introduction of the Clean Energy section has been modified to acknowledge issues associated with developing sufficient renewable sources of electricity to meet the County's needs, the need for reliable baseload power, the reliability of the grid to provide consistent energy supply, and other issues that must be addressed if the vision of a fully decarbonized energy supply for the County is to be realized.	Clean Energy introduction

Clean Energy Actions	Acknowledge that County is not able to meet its renewable energy goals only through energy generated within the County.	The introduction of the Clean Energy section has been modified to acknowledge that the development of utility-scale renewable sources like wind and solar will likely be developed outside the County's boundaries.	Clean Energy introduction
Clean Energy Actions	Define renewable energy, clean energy, and carbon-free energy.	A definition for carbon-free energy was added in the Definitions section (clean energy was already defined). The language in the Clean Energy section was edited to distinguish between renewable energy resources (e.g., wind, solar) from other carbon-free sources (e.g., nuclear, hydropower).	Definitions, Clean Energy section
Clean Energy Actions	Recognize other options of carbon-free sources of energy besides solar.	The language in the Clean Energy section was edited to distinguish between renewable energy resources (e.g., wind, solar) from other carbon-free sources (e.g., nuclear, hydropower).	Clean Energy introduction
Clean Energy Actions	Technical assistance, outreach, and education are necessary to expand adoption of clean energy.	The need for technical assistance, outreach, and education to promote the adoption of clean energy is acknowledged and discussed throughout the Clean Energy, Buildings, and Transportation sections of the CAP, as well as in Actions P-1 and P-3 in the Public Engagement section.	Clean Energy, Buildings, and Transportation sections; Actions P-1 and P-3
Clean Energy Actions	It is important to emphasize energy conservation and energy efficiency strategies in conjunction with renewables.	The Clean Energy and Buildings sections have been revised to add greater emphasis on energy conservation and efficiency.	Clean Energy and Buildings sections
Clean Energy Actions	Address land use issues associated with solar siting in the County.	The competing policy objectives that can arise related to solar siting in the County are addressed on the Clean Energy introduction as well as in Action E-3.	Clean Energy introduction, Action E-3
Clean Energy Actions	Prioritize local workers to install solar.	The CAP acknowledges the local economic benefits of on-site renewable energy like solar, but does not address workforce issues in detail. These issues can be addressed when considering policies and incentives that promote solar installations.	Clean Energy introduction

Clean Energy Actions	Recognize that decarbonizing the electric supply involves the State, the PSC, and utilities.	The role of the State, the PSC, and utilities serving the County in decarbonizing the electric supply is discussed in the Clean Energy introduction as well as in Actions E-1, E-3, and E-5	Clean Energy introduction, Actions E-1, E-3, and E-5
<b>Buildings Actions</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
CAP Actions	Effects of the Pandemic on the building sector (e.g., decreased rent from tenants, challenges of healthy indoor environments)	The County recognizes the financial and safety challenges the COVID-19 pandemic has created in the buildings where we live and work--particularly how to keep residents and workers safe while acknowledging the challenges building owners will face in making buildings financially viable in this new environment. Discussion of pandemic challenges as it affects all aspects of climate planning work are addressed in the CAP introduction.	CAP Introduction/ Executive Summary
CAP Actions	Concerns that the CAP actions lack sufficient level of implementation detail	The Buildings actions in the CAP are broad to enable the County to adapt to changing technologies. In-depth analyses of specific buildings are too granular for the CAP, but will be considered as each action is implemented, which will be documented in the CAP Annual Workplan.	General Comment
Buildings	Increase focus on energy conservation, energy efficiency	Modified the Buildings introduction to address the natural sequencing of actions the County can take to reduce emissions in buildings: conservation, efficiency, electrification, adding in renewables, then considering life-cycle costing and embodied carbon (for all buildings).	Buildings Introduction
Buildings	Concerns about the practicality of electrification and the phasing out natural gas	All Buildings actions related to electrification now include discussion of the timing of action implementation to ensure electricity grid reliability/availability, aligned with carbon intensity of the energy provided via the grid. Ensure that the electric grid can handle increased demand and is resilient to natural and technological hazards before requiring electrification. Also highlights incentives as a strategy to encourage electrification and grow the contractor market knowledge before mandating electrification.	Actions B-1, B-2, B-4, and B-5

Buildings	Changes to timing of code requirements and building action implementation	The County's ability to establish code requirements is dependent on the state's building code adoption process, which affects the timing of the County's adoption and implementation of code locally. Thus, some specific action implementation dates have been removed from the Buildings section.	Entire Buildings section
Buildings	Confusion around County's building code authority	Local jurisdictions within Maryland face an implied preemption that restricts natural gas bans at the local level, so Action B-6 has been updated to reflect this state legislative hurdle. Additional tools and strategies to disincentivize onsite fossil fuel use have been added to this Buildings action.	Action B-6
Buildings	Concerns about the County's approach to implementing actions	The Buildings section has been edited to highlight different ways to reduce emissions while gradually moving the market and fostering uptake of CAP building strategies (i.e., incentivizing vs. disincentivizing vs. outright ban/legislative requirement).	Entire Buildings section
Buildings	Incentives, cost-effectiveness/affordability of required actions	The CAP has been updated to discuss the logical phasing of actions such that incentives precede requirements, which allows the market to gradually improve availability of technologies at competitive price-points and better knowledge of implementing/servicing newer installed technologies. Also regional coordination is highlighted in the Executive Summary such that building upgrades and business operations do not become more expensive in Montgomery County over other local jurisdictions.	Entire Buildings section; CAP Executive Summary

Buildings	Development of market knowledge	Improving market knowledge spans multiple sectors: home builders, energy contractors, appraisers, lenders. Implementing building actions will create demand for jobs and training for new technologies and strategies--a phased approach to action implementation will help curb overwhelming the market with new requirements. The County will need to expand training on innovative and low-carbon technologies and newer building certifications. Specific building certifications are not referenced to keep the CAP a current document, as they may evolve over time.	Entire Buildings section
Buildings	Improved buildings have higher valuation and other benefits	The County recognizes that actions in the Buildings section can both increase the valuation of the building and the operating expenses in the building. As each action is implemented, the County will consider the co-benefits of each action.	Actions B-1, B-2, and B-3
Buildings	Indoor air quality in Buildings	One of the co-benefits of disincentivizing onsite fuel combustion is better indoor air quality and improving public health. In light of the COVID pandemic, creating healthy indoor spaces may be in conflict with stringent energy efficiency requirements (e.g., increased air changes per hour).	Actions B-1, B-2, B-4, and B-5
Buildings	Upgrades to historic properties	As Buildings actions are implemented, the County will collaborate with the historic preservation board to ensure that new requirements for existing buildings are in-line with historic preservation requirements and do not unduly burden historic properties.	Actions B-1, B-2, and B-3
Buildings	Equity Impacts of Building Actions to LMI communities	As these building actions are implemented, the County plans to provide technical assistance and financial incentives to ensure LMI building tenants are not unduly burdened with higher rents or higher energy bills. Ensure building policies are designed such that split-incentive issues and affordable housing are not impacted negatively. Each CAP action includes an Equity-Enhancing Measures section for consideration when implementing each action.	Entire Buildings section

Buildings	Material reuse and embodied carbon missing in the Buildings section	The CAP now includes mention of life-cycle costing and embodied carbon as a future strategy the County could consider following all-electric/net-zero building code adoption.	Buildings Introduction, Actions B-3, B-5, and B-7
<b>Transportation</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Transportation	Need more emphasis on Transportation Demand Management (TDM) strategies, including the use of transit and telework, and less emphasis on vehicle electrification. Clarify modeling GHG emissions reductions: Why is vehicle electrification assumed to account for 85% of reductions, vs. mode shift/TDM only 15%? With more aggressive policies mode shift could be a greater percentage of necessary GHG reductions.	Added language to explain: County already has implemented and is expanding many of the strategies necessary for mode shift - e.g., creating denser activity centers around transit hubs, improving biking and walking infrastructure, other Transportation Demand Management measures (e.g., telework programs, micromobility). While there is some room for further impact from these measures, making large increments of progress with these measures will require additional land use changes. Changes to the built environment take longer to reach fruition and impact GHG emissions than the 2027-2035 time horizon of the CAP. Faster progress is assumed to be able to be made - enabling County's goals to be reached - with vehicle electrification.	Entire Transportation Section
Transportation	Paying for CAP transportation strategies and need for robust incentives. Discuss County authority to impose new taxes on carbon - e.g., County gas tax, licensing fees, other strategies. Importance of using incentives from both inside & outside County budget.	Language added in several sections re: County must explore variety of options. Some actions will rely on incentives and disincentives that do not have direct cost to County. Some will rely on grants, other sources of funding. County does not have authority to impose local gas tax - must seek from State legislature. CAP wording changed to reflect this.	T-3, T-4, T-8

Transportation	Stop construction or expansion of highways, specifically M-83, I-495/I-270 project. Reflect recommendations of Transportation Technical Workgroup. Make strategies less car-centric.	Added wording to say: The County's intent is to reduce the number of new major road projects as much as possible. However, the need for new major roads must be evaluated on a case-by-case basis, particularly with regard to support of transit systems and other projects necessary to accomplish the goals of the CAP, Thrive 2050 and other key County policies and plans. Noted that the County does not have total control over these decisions - e.g., State's Managed Lanes project. Referred in the intro to the Transportation Action Section and included in retitled section T-4 - changed that title to: "Constrain Cars in Urban Areas, Limit Major New Road Construction."	Introduction; T-4
Transportation	Need more strategies using traffic management to slow speeding and calm traffic to enable more active transportation and micromobility and ensure safe conditions.	Added to T-2 para on micromobility: There are many opportunities for incentivizing broader use of micromobility which the County can implement as the program expands. Added to T-9 final para: Changes to signal timing to slow traffic while maintaining movement may also be implemented using system technology, with corresponding benefits to pedestrians, cyclists and those using micromobility.	T-2, T-9

Transportation	Need to reflect importance of other Zero Emissions technologies - not just electric vehicles - EVs.	Clarified that all references to "EVs" include all forms of Zero Emissions Vehicles - "ZEVs." Changed a number of rerreferences from EVs to ZEVs. Discussed potential for new technologies in transportation, including hydrogen fuel cells. T-3: Created new para 2: Throughout the discussion of EVs in this Plan, the term "Electric Vehicle" or "EV" incorporates "Zero Emissions Vehicles" or "ZEVs." ZEVs can be powered by electricity or other clean fuel technologies, including hydrogen fuel cells. T-5: Added text: Other technologies such as fuel cells may also become available to similarly reduce vehicle emissions – and are incorporated by reference in this Plan whenever EV vehicles are discussed. T-11: The County is also exploring hydrogen fuel cell technologies for off-road equipment as well as other forms of Zero Emissions Vehicle (ZEV) technologies.	T-3, T-5, T-11
Transportation	Need to reflect importance of Metro system in achieving County's goals; importance of collaboration on service, infrastructure for ZEV bus system.	Created a "Call-Out" box to highlight role of Metro as critical component of County's transit infrastructure and land use policies. Included electrification of Metro's bus fleet, EV charging at their parking facilities, creation of new entrances to bring Metro closer to broader array of properties.	T-1
Transportation	Concerns about cross-jurisdictional impacts from some actions, esp. T-4 re constraining cars in urban areas. Concerns re impacts on property values, deliveries, ADA & other vulnerable residents from limiting cars in urban areas and imposition of pricing mechanisms	Added language in retitled T-4 "Constrain Cars in Urban Areas, Limit Major New Roads" - acknowledging potential impacts on property values could be positive and/or negative and will require further research. Implementation of some related strategies will require coordination with State of Maryland, other states and jurisdictions.	T-4

Transportation	COVID-19 impacts - permanent changes in transportation modes with much greater ongoing use of telework	Added references to COVID impacts but clarified assumption is that there will be a return to closer to normal transportation modes, even if with greater telework.	Transportation Intro
Transportation	Clarify the utilities have a significant role to play in electrification of the fleet including implementing programs to increase availability of EV charging in the County	T-5 & T-6 - Added wording: The County will explore partnerships with companies, agencies and utilities whenever appropriate to achieve its fleet electrification goals. T-7, para 4: Added text: The County is currently coordinating with Pepco under a Maryland Public Service Commission mandate, and will also work with other utilities serving the County.	T-5 & T-7
Transportation	Plan is not sufficient b/c transportation sector is 2nd highest GHG emitting sector yet no actions identified that are "highly effective" in reducing those emissions.	Added a paragraph to explain the transportation sector is not projected to produce "High" levels of GHG emissions reductions b/c the County has a lower amount of direct influence on policies to impact uptake of low-emissions transport than uptake of low-emissions energy or buildings. County can require certain actions for energy or electrification of buildings - but can only incentivize or disincentivize transport.	Entire Transportation Section

Transportation	<p>Relationship of several of the Transportation Sector Actions to land use should be highlighted. Need to tie transportation actions more directly to Thrive 2050 General Plan recommendations. Acknowledge increased community density is necessary for many of the transportation strategies to work - e.g., active transport. Need to reference housing affordability importance and relationship to transportation &amp; missing middle of moderate income housing.</p>	<p>Added references to Thrive at several points within the CAP and re importance of appropriate land use planning - and increased densities - in several places in Transportation Section. Added specifics re affordability and "missing middle" of housing at several points. Updated the description of the Thrive Montgomery 2050 General Plan update, to more clearly state the nexus between land use planning and its impact on GHG emissions, carbon sequestration, and adaptation to climate change.</p>	Background; All Transportation Actions
Transportation	<p>Electrification of vehicles won't solve congestion and won't serve many residents in the County, making it an equity issue. Better transit, parking charges, congestion pricing, dedicated bus lanes, support for active transportation with better bike lanes, shady sidewalks and compact land use are better solutions to climate change.</p>	<p>Included greater discussion of land use and highlighted importance of Thrive with regard to several actions. Noted the need for compact land use to encourage residents to reduce vehicular travel; emphasized need for greater use of public transportation.</p>	Entire Transportation Section

Transportation	<p>Clarify congestion pricing is not the only strategy available to reduce private vehicle access to urban areas. Note parking management policies can have similar effect. Importance of telework and other TDM measures. Parking revenues can be used to support transit, biking, other modes.</p>	<p>Added wording to acknowledge parking pricing also a mechanism available; added wording to reflect use of telework and other TDM measures can impact Actions in addition to T-8. Added wording to acknowledge potential use of revenue from parking to reduce cost of transit passes, improve biking options, other TDM measures.</p>	T-4, T-8
Transportation	<p>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.</p>	<p>T-8: Added next-to-last para: The County has focused on NADMS as the primary metric for evaluating success in its TDM efforts. NADMS measures the percentage of trips made by various non-auto modes during certain times of day, usually peak-hours. County Council recently updated the NADMS goals for all areas of the County as part of its action on the County's Growth Policy. Another potentially useful approach to measuring progress in reducing vehicle use is Vehicle Miles of Travel (VMT). This metric is commonly used as an indication of overall quantity of vehicle travel. It includes trips of all types, including those passing through an area as well as those originating in, or destined for, a certain area. The addition of VMT as a measure of TDM success will need to be evaluated in the context of current law and regulations.</p>	T-8

<p>Transportation</p>	<p>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.</p>	<p>No changes made - more detailed discussion of medium- and heavy-duty vehicles and electrification and fuel efficiency improvements to be made considered beyond the scope of the CAP.</p>	<p>T-3</p>
<p>Transportation</p>	<p>County should implement its Bicycle and Pedestrian Master Plans as well as Vision Zero transportation safety initiatives + prioritize bicycle infrastructure and trail projects to complete gaps and connect existing networks." 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.</p>	<p>Updates to wording made to reflect these points.</p>	<p>T-2</p>

Transportation	Add language to reflect use of park trails and need to connect gaps, integrate with other trails in County transportation system. Clarify funding can be used for road diets that incorporate improvements to bike- and ped network	T-2, para 4: Additional text added re the County could prioritize bicycle infrastructure and trail projects to fill gaps to connect existing active transportation networks. 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, including extensions and connections to neighborhoods, activity centers and surrounding jurisdictions. The active transportation network can also be improved through expansion of the existing program for "road diets," which include the removal and repurposing of both travel and parking lanes for other modes of transportation. Need for increased maintenance and provision of bikeway/trail amenities also referenced - e.g., wayfinding, bike racks and fix-it stations.	T-2
Entire CAP	Request inclusion of all Workgroup Recommendations in the CAP	Appendix with all recommendations of all Workgroups is included.	Entire Transportation Section
Transportation	A combination of existing policies and creative business partnerships with the County can accelerate the deployment of EV charging by private sector. Several alternative approaches exist. County should support efforts by the private sector to invest in the County to achieve its carbon emission reduction goals. County should partner with housing providers to incentivize the availability of shared EV parking.	Added text: Technology is evolving to make installation of EV charging much less costly in the future. In addition there are also many creative approaches the County may explore for partnering with the private sector to provide increased numbers of EV charging stations over the coming years. New approaches can be explored as part of the County's EV-Readiness Master Plan. Impacts on housing affordability need to be carefully evaluated but we cannot accept a future where all buildings but those with affordable housing have on-site EV charging available.	T-7

Transportation	County should consider carefully negative impacts of carbon tax on economy as businesses trying to recover from Covid. Also impacts on vulnerable populations.	Added para at end: A scope of study for implementation of a carbon tax must include impact on vulnerable communities - as well as impacts on businesses and the economy. Implementation of a Vehicle Carbon Gas Tax will likely occur well after the impacts from Covid-19 are past.	T-12
Transportation	Conversion of 100% of vehicles to EV/ZEV: County should not force people to buy electric cars and appliances - reduces consumer choice, and penalizes natural gas, which is much cleaner than oil. Should acknowledge role of the marketplace, difficulty of accomplishing conversion of 100% of fleet by 2035.	Clarified in text County is not forcing anyone to buy EVs - no authority to do that. Persuasion, incentives and disincentives are only mechanisms available - which is why many of the transportation strategies are not as effective at bringing down GHG emissions. County will develop EV Strategic Plan involving many different approaches, incentives, and disincentives.	T-3
Transportation	Need to acknowledge, provide context for regional efforts to fund and deploy transit, electric chargers, congestion charges, integrated signaling and more. Add info on the Transportation Climate Initiative (TCI).	Provided "Call-Out" box to discuss regional climate goals, role of Metropolitan Washington Council of Governments, coordination with other area jurisdictions; and efforts to learn from other areas across the U.S. T-12: Revised para 3 to address TCI in greater detail.	Background; All Transportation Actions; G-10

Transportation	Need summary at start of each Action chapter of key actions to help readers. Need highlighting of key statements, bullets for sub-actions, more Call-out boxes to help readers understand the material.	Key concepts, wording will be highlighted. Bulleting sub-actions considered but determined to be too lengthy a process.	All Transportation Actions
Transportation	Need to acknowledge relationship of CAP to Master Plan of Bikeways and Pedestrian Master Plan - and possible need to amend per CAP.	T-2: para 5 revised to add text: 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. All of these plans, whether adopted or in draft form, are highly supportive of the principles included in this CAP. If over time it becomes necessary to revise them to support additional actions needed to achieve the climate goals, that can be done through amendments to those plans.	T-2
Transportation	Concern the strategies in T-3 Vehicle Electrification rely too much on actions beyond the County's control.	Discussed how there is a range of actions, including incentives & disincentives, available to achieve electrification of vehicles. County will need to develop an EV Strategic Plan. Added line at end of T-3: Many factors will impact EV uptake, a number of which are beyond the control of the County. The County will need to focus on the factors within its control, while making a concerted effort to influence the ones it does not control.	T-3
Transportation	Clarify in Transportation Intro that carbon-free transportation is the goal.	Changed bullet points in Transportation Intro to reflect key goals. Made terminology consistent by calling everything "zero-emissions" vs. "carbon-free."	Intro
Transportation	Explain active transportation and shared micromobility further, including necessary infrastructure; add re how the County can better promote.	Added text to T-2 re additional infrastructure needed and actions the County could take to promote use of these alternatives.	T-2

Transportation	CAP should call for elimination of all gas-powered vehicles by 2027 as one obvious step to reaching zero emissions.	Clarified in the text that "vehicle choice is personal & cannot be regulated" - noted that MoCo does not have control over adoption of EVs or ability to outlaw them by 2027. Can only provide incentives & disincentives.	T-3
Transportation	Include discussion of conversion to EV of fleets besides County and MCPS - e.g., WMATA, MTA, circulators, private schools, churches, camps, etc.	Included wording to say important for other transit systems and transport vehicles (e.g., churches, private schools and camps) convert fleets to EVs.	T-5
Transportation	Expand strategies re EV Car Share to target groups beyond low-income households. Acknowledge all programs do not need public funding, can be fee-based and public-private partnerships (P3s).	Revised and added text to T-10 re carshare programs can be flexible as to market. However, target to LMI households intended to improve access to EVs - and for those some subsidy would probably be needed.	T-10
Transportation	Utilities can support congestion pricing and related efforts using their investments in remote technology.	Added text to T-4 to say: Utilities may have a role to play in providing some of the technology available to implement congestion pricing and ways to exempt those and other types of users – including emergency responders and low income residents.	T-4
Transportation	To allay range anxiety and related fears of prospective EV drivers their battery may run out, expand Guaranteed Ride Home program to registered EV users.	Added to T-3 and referenced T-7: Extension of a Guaranteed Ride Home program similar to that offered in the Washington region for users of alternative transportation like transit and car/vanpooling could be considered.	T-3
Transportation	Need to promote the used EV market as a way to lower the cost of EVs and increase uptake.	Added to T-3 Equity Enhancing Measures notations that "Incentives (for EVs) could also be extended to purchase of used EVs."	T-3

## Governance Actions

CAP Section	Comment Themes	General Responses/How to Address	Applies to
Governance	Define County climate roles and responsibilities, relationships between roles, the role of the climate change officer, and organizational oversight for climate initiatives.	Added an overview of the current MCG structure for facilitating climate initiatives, including the role of the climate change officer, climate planning team, climate leadership team, climate ambassadors, and Clean Energy and Air Quality Advisory Committee.	Governance intro
Governance	Add a performance element to every County employee's performance plan that supports the goals of the CAP.	Expanded G-3 to include that all County employee performance plans should incorporate climate change and racial equity.	G-3
Governance	Identify incentives to encourage departments and staff to participate in climate innovation efforts	Added language about ways to incentivize departments and staff to undertake this effort.	G-5
Governance	Explain how the Climate Ambassadors will be sustained over time, how the Climate Ambassadors' efforts will be integrated with other climate initiatives, and ways to acknowledge contributions of front-line staff.	Added more detail to the role of the department Climate Ambassadors and details about approaches departments can use to staff this role. Added language about the need to integrate this effort with the work of the Climate Leadership Team, as well as to solicit ideas from staff within departments.	G-6

Governance	Action G-7 should also include the evaluation of codes and stormwater management among the examples listed of processes/plans that must account for climate change. Clarify the need for departments to undertake G-7 and monitor progress.	Incorporated codes and stormwater management within the action. Clarified the need for departments to establish continuous improvement plans and to monitor progress, through the annual department performance report.	G-7
Governance	Implement a climate test to help ensure that all significant county budgetary, legislative, regulatory and programmatic decisions are consistent with the CAP	Action G-8 already references the need to establish a climate impact statement to evaluate all pending bills, budgets, plans, and land use decisions.	G-8
Governance	Elevate the role of procurement to leverage climate action	Added procurement to the title of G-8, incorporated sustainable food purchasing, incorporated language on making green specifications available to the private sector to incentivize its use more broadly, and added language on partnering with anchor institutions on procurement.	G-8
Governance	More clearly describe the process by which the County will include climate considerations into its budgeting process	Added more details about the Fiscal Year 2022 budget process and added description on the projected next steps with climate budgeting.	G-9
Governance	Expand G-10 to include potential sources of funds; provide more informatoin about the financinig working group.	Provided more examples of innovative funding streams for the financing working group to consider. Provided description of the Montgomery County Green Bank and opportunities for expanding its role in funding climate action. Information about the timeline for standing up the financing working group will be addressed through the annual climate work plan.	G-10

Governance	Need more information on how metrics will be set and goals prioritized. Incorporate monitoring and evaluation.	Added language about CountyStat and opportunities for assisting with metrics development, monitoring, and evaluation. Added information about quarterly implementation progress check-in meetings with the County Executive. Provided additional examples of potential metrics.	G-11
Governance	Expand the role of the Climate Leadership Team to provide input into governance structures and metrics and input on budgets and timelines.	G-12 already includes a description of the Climate Leadership Team, including its role in providing strategic guidance on action implementation. Expanded the Climate Leadership Team's description of duties to also include improving information flow and to explore other models to facilitate and coordinate the implementation of climate action.	G-12
Governance	Clarify if G-14 emission reductions are additional to those in other CAP actions.	Clarified that G-14 is additional and complementary to other CAP actions.	G-14
Governance	Build modeling tools to conduct 'what-if' analyses for assessing decision sensitivity	Added language for the County to draw on existing modeling and scenario planning tools. Other entities are better equipped to create tools from scratch; the County can leverage tools created by others.	G-15
Governance	Provide more detail on the process for future vulnerability assessments.	Clarified language on the vulnerability assessments-- that it will include pinpointing hotspots and key assets, will complement A-3 and G-11.	G-16
Governance	Include municipalities, the state, and federal government representatives in an intergovernmental coordinating committee.	Municipalities are already included in the Climate Leadership Team. Expanded the Climate Leadership Team description to create opportunities to hear from state officials and others. Coordination with jurisdictions across the state is a key component of P-10.	G-12, P-10
Governance	Create a Climate Ombudsman position; create a Climate Trustee position.	As described in G-4, the County will determine the need for new climate positions through the annual budget cycle. The CAP does not make specific position requests.	G-4

Governance	Consider establishing a separate climate department within MCG	Added language in G-12 for the Climate Leadership Team to explore different models for facilitating and coordinating the implementation of climate action, including the possibility of creating a new climate office.	G-12
Governance	Limit the number of leads for actions.	We support the idea of limited number of Leads to improve accountability. As we move each action towards implementation we will designate a de-facto lead.	Climate Actions

### Carbon Sequestration Actions

CAP Section	Comment Themes	General Responses/How to Address	Applies to
Sequestration Actions	A number of commenters suggested the inclusion of the term "no net loss of forest" in this section or suggested concrete numbers for a percentage of tree/forest cover be included for accountability.	Reviewers appreciated these comments as they pointed out a need to strengthen the first two actions, in particular, to move beyond retention of tree canopy and forest cover to actually increasing them. Because trees in particular also have significant co-benefits in offsetting the heat island effect and reducing stormwater run-off, increasing their numbers should be a priority in helping address inequities and coping with some of the challenges of climate change, naming increases in heat and severe storms and flooding events. The titles to both actions related to trees, S-1 and S-2 were changed to reflect not just retention, but an increase in tree and forest canopy. Added language to require a detailed and robust assessment of the current tree canopy and forest cover in the County, to include age/maturity of forests and street trees, health, diversity of species, etc. It was felt that in order to arrive at a recommendation about an increase in forest and tree canopy, a higher-quality, more accurate assessment needed to be completed, similar to one being undertaken by Casey Trees in Washington, D.C. Change was also made to the S-4 action regarding regenerative agriculture to also include an accurate assessment of current use in the Agricultural Reserve to enable meaningful	S-1 and S-2 actions and the Sequestration Introduction

Sequestration Actions	A request for more clarity about what was meant by wood and forest industry/salvage.	We added a box to use wood salvage as an example of a whole-systems carbon approach, i.e. salvaging wood from fallen trees, dead trees, removed trees, etc. should be milled and utilized locally for furniture and high quality wood product production, where possible, to keep the carbon in that wood sequestered.	S-6 action
Sequestration Actions	There were requests to elevate food insecurity and local remedies to it within the CAP.	Although this crosses a number of sections, particularly Adaptation and Sequestration, it was decided to create a call-out box under the Regenerative Agriculture chapter to highlight the value of the local Agricultural Reserve, promote local food production, including farmer's markets, local food buying for restaurants, local food processing, community gardens, and access to safe, shaded corridors to access food in areas at risk of urban heat island effect.	S-4 action
Sequestration Actions	A need to address HOA and community restrictions that might make it more difficult to use regenerative practices in home yards and gardens.	Language was added to the Soil Fertility action to: Review all local laws, including HOA covenants, to identify hurdles and develop template language for HOAs and local jurisdictions to support the goals of the CAP.	S-5 action
Sequestration Actions	There were multiple suggestions related to growing jobs and opportunities in at-risk communities as they relate to climate change.	Language was added to the Equity Enhancing Measures to: Actively encourage a partnership between the existing Conservation Corps and local educational institutions to offer training and develop expertise in green infrastructure, soil health, and tree maintenance, including tree climbers and licensed tree experts (LTE) and expand opportunities in green careers for local youth.	S-1 and S-2 actions

Sequestration Actions	There were suggestions to highlight the importance and value of the Agricultural Reserve in sequestering carbon in the first paragraph of S-4 Regenerative Ag by including language about the percentage of the County's land area held in this reserve.	Added language to say: The Ag Reserve was deliberately created to preserve agriculture and is in a unique position to provide local food and promote carbon sequestering practices.	S-4 action
<b>Public Engagement, Partnerships, Education, and Personal Actions</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Public Engagement	Place greater emphasis on the importance of using a health frame when engaging community members, including in the CAP itself.	In P2, incorporated additional, clarifying sentences as well as a link to a flyer produced by the Medical Society Consortium on Climate & Health and the American Lung Association highlighting how climate change has created a health emergency. Also added a CDC graphic focused on the linkages between health and climate change in the Racial Equity and Social Justice section.	
Public Engagement	Draw on more of the work conducted by the Evidence-Based Communications Sub-Committee	In P3, added a decision making flow chart from the Sub-Committee to help determine which activities are communicated in outreach campaigns.	
Public Engagement	Broaden engagement with students beyond high school and create green career opportunities.	In P-14, language added focused on the promotion of careers in climate change and apprenticeship opportunities through Montgomery College and Universities at Shady Grove.	

Public Engagement and Governance	Give more attention to the importance of plant-based diets.	In P-16, referenced the City of Berkeley's Green Monday campaign and the importance of sustainable procurement practices through MCPS' potential participation in the Good Food Purchasing Program; added more information in the "What Can I Do?" section encouraging residents to consider Meatless Mondays; green specifications related to sustainable food purchasing was also added to G-8.	
Public Engagement	Community engagement on the part of County Government should be an equal, multiple-party exchange with the government willing to learn as well as teach; solutions should be based on residents' lived experiences, needs and interests, and speak to their day-to-day life challenges. Most importantly, community engagement should not be transactional but rather a process of co-creation in which community members are regarded as authentic partners and collaborators.	New action, P-6, was added: Community Justice Academy in which Graduating Community Ambassadors Representing their Neighbors Conceive and Co-create Integrated Health, Equity and Quality-of-Life Solutions Directly Applicable to their Communities. The central thrust of this action is about power sharing and the co-creation of community based solutions.	
Public Engagement	Increase climate change education by incorporating climate change into courses other than science, such as English, Social Studies, etc. and facilitate greater awareness on the part of parents.	In P-19, added language about lending out climate-related books and partnering with the Linkages to Learning program.	

Public Engagement	Seek partnerships with public health institutions.	In P-13, language added emphasizing the importance of partnerships with health institutions, clinics and academic programs.	
Public Engagement	Make explicit the inclusion of young people's voices in decision-making and governance.	In P-11, youth groups were added as part of a Statewide coalition to advocate for more ambitious climate policies.	
Public Engagement	There should be greater emphasis on partnership building, particularly with existing institutions and groups such as public libraries and faith-based organizations, as well as municipalities; retired professional scientists and policy experts should be leveraged.	In P-9, language added emphasizing the importance of partnerships and incentivizing municipalities to innovate through friendly competitions; in addition, the County Volunteer Center is cited as a resource to tap the expertise of retired professionals living in the County.	
Public Engagement	Enlist the efforts of the students of the Communications Departments of Montgomery College and the University of Maryland.	In P-3, language added about engaging Communications students from Montgomery College, the Universities at Shady Grove, and the University of Maryland.	
Public Engagement	Add in the "What Can I Do?" section information on what residents can do to build their own resilience, including flood proofing.	Under the "What Can I Do?" section, six actions were added to build climate resilience including purchasing flood insurance, flood proofing homes, reducing health risks, etc.	
Public Engagement	Add in the "What Can I Do?" section the importance of advocacy and the need for systemic change.	Under the "What Can I Do?" section, a new action was added focused on getting involved politically at the municipal, county, state and federal levels; there is also an emphasis on the need for systemic change, requiring both governmental solutions (legislative and regulatory) and business reforms.	

Pubic Engagement	Prioritize climate adaptation and resilience for public schools and especially Title 1 communities.	In P-18, language was added focused on culturally relevant climate adaptation and resilience workshops for parents, starting at Title 1 schools.	
<b>Zero Waste Language</b>			
<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Zero Waste Task Force Planning and Initiatives	Focus on waste reduction and reuse.	The CAP has been updated to reflect the draft amendments to the County's Ten-Year Solid Waste Plan, which reflects an increased emphasis on waste reduction and reuse.	Zero Waste section
Zero Waste Task Force Planning and Initiatives	Increase food donation/rescue and food waste composting for the remainder.	The CAP has been updated to reflect the draft amendments to the County's Ten-Year Solid Waste Plan, which reflects an increased emphasis on reducing generation of food waste and developing capacity for food waste composting.	Zero Waste section
Zero Waste Task Force Planning and Initiatives	Terminate use of the incinerator and landfill remaining waste.	The CAP acknowledges the Ten-Year Plan goal of closing the Resource Recovery Facility by 2026.	Zero Waste section
Zero Waste Task Force Planning and Initiatives	Implement a "pay-as-you-throw" waste collection approach.	The CAP has been updated to reflect the draft amendments to the County's Ten-Year Solid Waste Plan, which includes a plan to initiate a pilot pay-as-you-throw program.	Zero Waste section
Zero Waste Task Force Planning and Initiatives	Implement additional bans on bags and other plastic materials.	The CAP has been updated to reflect the draft amendments to the County's Ten-Year Solid Waste Plan, which discusses potential bans on plastic bags, and other hard to recycle plastics.	Zero Waste section

## Remaining Emissions

CAP Section	Comment Themes	General Responses/How to Address	Applies to
Remaining Emission Sources and Potential Reduction Strategies	Conduct a consumption-based inventory.	In several places in the CAP, it is noted that consumption-based emissions are not included in a typical community-based emissions inventory. Nonetheless, the County recognizes the magnitude of emissions associated with consumption and proposes community engagement focused on what individuals can do to reduce consumption related emissions as well exploring the magnitude and nature of consumption-based emissions.	Consumption Emissions section
Remaining Emission Sources and Potential Reduction Strategies	Examine opportunities and develop strategies for the reduction of emissions from refrigerant gases.	The Hydrofluorocarbon and Refrigerant Emissions section has been revised to reflect the activity under the Biden administration to address HFCs, as well as acknowledging the role the County plays in ensuring proper recycling of equipment that contains HFCs and the fact that incentives could be offered to spur replacement of equipment with non-HFC coolant models.	Hydrofluorocarbon and Refrigerant Emissions section
Remaining Emission Sources and Potential Reduction Strategies	The discussion of emerging technologies for carbon capture and storage avoids mention of any of the most promising carbon dioxide removal technologies now being researched and in some cases deployed.	It is beyond the scope of the CAP to explore carbon dioxide removal technologies that are being researched or in the early stages of deployment.	n/a
Remaining Emission Sources and Potential Reduction Strategies	Too low a multiplier is used for methane in calculating its Global Warming Potential (GWP).	The inventories conducted by the Metropolitan Washington Council of Governments are consistent with all relevant community inventory protocols - ICLEI's US Communities Protocol and the Global Protocol - and have been third party verified to be compliant with the Global Covenant of Mayors for Climate and Energy Common standards (Reporting Framework and Guidance).	n/a

## Paying for Climate Action, Looking Forward

<b>CAP Section</b>	<b>Comment Themes</b>	<b>General Responses/How to Address</b>	<b>Applies to</b>
Paying for Climate Action	Ensure there is sufficient budget to pay for climate action.	Provided clarification that as implementation of CAP actions will take place over many years, not all of the funding can be identified or are available immediately. The sheer scale needed to implement the CAP will require both public and private resources.	Paying for Climate Action
Paying for Climate Action	The Paying for Climate Action section needs to move further up within the CAP.	Moved the Paying for Climate Action section from the end of the CAP to just prior to the Climate Actions section.	Paying for Climate Action
Paying for Climate Action	Describe what financing strategies are available; provide more detailed funding options or initial ideas	Added description of a variety of innovative financial tools that are already in use and which should be further leveraged.	Paying for Climate Action; G-10
Paying for Climate Action	Highlight the Montgomery County Green Bank--what it does, what it already offers, and opportunities for leveraging their partnership.	Added a description about the Green Bank as a key partner in paying for climate action, including their establishment, current product offerings, and their unique role in furthering CAP implementation.	Paying for Climate Action

Paying for Climate Action	Estimate the costs to implement the CAP; include the total costs of all interventions; address the economic impacts on individuals and businesses.	Added an explanation of the approach used to estimate the costs of action implementation. Each action identified in the Plan includes an approximate estimate of the initial investment levels for both the County and private sector, providing some insight into the magnitude of cost required for climate action. The estimates in the CAP do not include the total costs or a detailed cost breakdown; the CAP provides the initial, incremental cost that is the most important to estimate because this is the initial barrier to implementation that needs to be overcome. The assessment also does not attempt to estimate the economic impact at the scale of individuals and individual businesses. Developing more precise and fine-grained cost assessments would require additional data inputs and would depend on the manner in which each action is designed and implemented. The County will need to consider the costs and benefits to residents and businesses as part of each action implementation. As the County implements the CAP, it will be critical to find ways to mitigate the cost impacts to low- and moderate-income residents in particular to ensure that our most vulnerable residents are not impacted unfairly.	Paying for Climate Action; Climate Actions
Paying for Climate Action	Discuss the County's Fuel Energy Tax	Added references to the Fuel Energy Tax. The County will need to explore the Fuel Energy Tax to have a greater nexus with directly funding climate actions.	Paying for Climate Action
Looking Forward	Include a climate legislative agenda in the CAP	The legislative and regulatory policy agenda for the upcoming year will be a component of the annual climate work plan.	G-11; Looking Forward and Next Steps
Looking Forward	Provide a progress report on CAP action implementation	The County has committed to annually issue a work plan outlining the climate work agenda for the upcoming year. The Looking Forward section has been updated to outline the components of the annual climate work plan. Action G-11 also includes the development of a webpage with dashboard elements that will provide regular status updates for residents and County departments on the implementation of actions.	G-11; Looking Forward and Next Steps

Looking Forward	Provide an update on the Sustainable Economic Development Report	This section has been updated to reflect the current status of the Sustainable Economic Development Report as of late May 2021, including strategies to realize the economic potential of the CAP actions and help inform the County's Economic Development Strategic Plan.	Looking Forward and Next Steps
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