

Sunday, February 28, 2021

Ms. Adriana Hochberg
Assistant Chief Administrative Officer and Climate Change Coordinator
Montgomery County Government
Executive Office Building
101 Monroe Street, 2nd Floor
Rockville, MD 20850

Dear Ms. Hochberg,

Thank you for the opportunity to provide feedback on the Montgomery County Climate Action Plan (CAP). It is clear that much effort and thought went into the creation of the CAP. We realize this was a huge undertaking and we appreciate the many, many hours of hard work and care that you, the entire staff and the consultants did to bring this draft to fruition.

The comments that follow are from the Montgomery County (MoCo) CAP Coalition, a newly formed group of organizations in the County that has come together to identify the strengths and challenges in our County's plan, and to work collaboratively on the next steps to restore a safe climate for all of our residents. We represent over 26 organizations and groups with thousands of members in Montgomery County, advocating for climate action, racial justice and social equity, environmental protection and conservation, food justice/sovereignty, public health and more. While we represent a diverse set of priorities and expertise, we all agree on the central concern that climate change is an emergency and must be addressed immediately with bold action.

Our feedback on the CAP is direct and forceful, and our goal is to urge you to finalize a Climate Action Plan that is effective, forward-thinking, and nation-leading. The CAP also needs to lay out an implementation roadmap and a path forward as we work together to achieve the goals of the Climate Emergency Mobilization Resolution (CEMR).

In addition to our comments submitted in the attached document, we have two requests:

One - that you put forward a climate implementation plan for 2021 by April 22, Earth Day. This should announce a rapid shift into emergency mode and list the specific climate actions that the County will take this year which could include executive orders, legislation, memorandums of understanding with county institutions and agencies, agreements with major private and public employers, programs in our County, cities and communities, and aggressive collaborations with state, regional and federal agencies and other partners to push forward a climate action agenda that reduces greenhouse gas emissions from transportation, buildings, and residences, but that also takes effective action on adaptation and the sequestration of carbon;

and

Two - that you implement an aggressive outreach program to immediately engage Black, indigenous and people of color communities (BIPOC), low-income, labor, youth and other groups as active partners and decision-makers in the climate implementation plan. This means having direct consultations with these groups and ensuring that representatives are at the table to identify and move priority climate actions forward. It is critical that these groups identify and help design actions that concurrently address key issues such as jobs, housing, transit, health, energy poverty, and food access. They must also have a voice in evaluating how potential co-benefits and 'equity enhancing measures' described in the plan will be realized. Implementation of the CAP also requires significantly increased education and opportunities for residents, communities, businesses and political leaders to engage in and support climate actions that are equally transformative in racial equity and social justice. Finally, it is important to recognize that our County's youth are also equally vital stakeholders and their voices and concerns need to be addressed by including them immediately as active partners and decision-makers in the climate implementation plan.

Please let us know if you have any questions or need clarification on our comments. We look forward to working with you in implementing the County's Climate Action Plan.

Sincerely,

MoCo CAP Coalition

350MoCo

Audubon Naturalist Society

Bethesda Green

Biodiversity for a Livable Climate

Cedar Lane Ecosystems Study Group

Cedar Lane Unitarian Universalist Church Environmental Justice Ministry

Chesapeake Climate Action Network

Climate Health Solutions

Coalition for Smarter Growth

Conservation Montgomery

Extinction Rebellion MoCo

Friends of Sligo Creek

Give A Shift

Glen Echo Heights Mobilization

Montgomery County Faith Alliance for Climate Solutions

Montgomery County Civic Federation, Inc., Executive Committee

Muslim Voices Coalition

One Montgomery Green, Inc

Query Mill Farm

Safe Healthy Playing Fields Inc.

Sugarloaf Citizens' Association

Sunrise Rockville

TAME Coalition (Transit Alternatives to Midcounty Highway Extended)

The Climate Mobilization, Montgomery County Chapter

Unitarian-Universalist Church of Silver Spring

West Montgomery County Citizens Association

Montgomery County CAP Coalition
Comments on the
Montgomery County
draft Climate Action Plan (CAP)

Introduction

These comments are submitted on behalf of the Montgomery County Climate Action Plan (CAP) Coalition. The Coalition grew out of conversations among climate, environmental, housing, transportation, labor, food justice, and other community advocates after the release of the draft CAP in December 2020. We realized that we shared many core concerns about the CAP and that we wanted to use this important document to build knowledge and solutions around its improvement and implementation. Our mission statement is as follows:

Mission: *To be an effective advocate for achieving the County goals of:*

- Restoring a safe climate
- Creating a sustainable economy
- Joining a global climate mobilization
- Reducing greenhouse gasses by 80% by 2027 and 100% by 2035
- Initiating large-scale efforts to remove carbon dioxide from the atmosphere
- Resilience (adaptation, ecological systems resilience), and
- Building racial justice and social equity.

We submit this document as a coalition, but groups within the Coalition may be submitting separate comments on the CAP as well.

General Comments

The CAP adopts the emissions reduction targets and dates of the Climate Emergency Mobilization Resolution (CEMR) passed by the Council in 2017. We applaud the County for dedicating itself to these **far-reaching and nation-leading goals**. Nevertheless, we urge the County to consider a reappraisal of the targets on a regular basis since the latest climate science demands even stronger and faster emissions reduction goals.

However, the CAP does not lay out a full plan to achieve the emission reduction goals. The CAP only identifies a path to reducing 83% of County emissions by 2035. Additionally, it makes no mention of the restoration of a safe climate, nor of the goal to join a worldwide mobilization to restore a safe climate. Eliminating GHG emissions, no matter how quickly, is insufficient to restore a safe climate such as the planet experienced prior to industrialization. Removing CO₂ from the atmosphere on a large scale, as the Climate Emergency Mobilization Resolution clearly states, is essential. We urge the County to **address these gaps**.

We are pleased that the CAP describes some of the most challenging actions needed to reduce emissions with clarity and boldness. Examples include the need to electrify all transport in the County and the need to retrofit all existing buildings to remove natural gas and oil systems.

These will be challenging tasks to complete, and the CAP creates the framework for real conversations to begin about how to achieve them.

We are also pleased to see adaptation actions for climate-resilience embraced in the CAP as an equal priority to emissions reductions, and to see a stronger focus on sequestration action than was featured in previous climate planning by the County.

Moving the CAP to Action and Implementation in 2021

The CAP, though containing many positive strategies and plans for achieving climate goals in the County, must respond to the first and most significant part of the Climate Emergency Resolution: the declaration of a climate emergency. The plan **lacks a sense of urgency**, or of a need to not only describe critical actions, but to show a clear pathway to rescuing the County's population, land, and infrastructure from the climate emergency already upon us. At the time the CEMR was adopted over three years ago, we would have needed to increase our rate of emissions reduction by a factor five to six times faster in order to meet the CEMR goals. Brutal climate math suggests that the county will now need to eliminate emissions some *seven times* faster in the next seven years than it was able to accomplish in the past 15. **We have no more time to waste.**

The CAP needs to explain to the public why such a rapid and transformative effort to eliminate CO2 emissions is necessary and what the **benefits and costs are to the public**. Both the dire threats and the enormous opportunities presented by the climate crisis need to be explained in clear, honest, and convincing ways.

The CAP also needs to be **more user-friendly**. The data that were used in generating the analysis should be made available in the CAP. Various charts showing relative benefits, co-benefits, investment feasibility, county authority and more are confusing, and in need of absolute values where possible, rather than just relative values. The text should have sections devoted to important actors and interests including municipalities, private businesses and associated county organizations such as Montgomery College, Montgomery County Public Schools, and the Montgomery County Planning Board.

It's time to create a **dedicated County workforce to address climate change**. Relying on contractors seems to indicate an intent to work on climate planning in a piecemeal fashion as a series of short-term projects. The plan should commit the County to fund and fill positions with dedicated staff who will develop expertise and give the effort continuity and momentum. Significant staffing will be required to manage the implementation of this long term and complex effort. Yet no mention is made of either the specific projected staffing needs or of how this effort will be paid for.

The CAP unfortunately remains incomplete in a core part of its mission: to provide **a plan for implementing, coordinating, funding, and measuring** the actions it describes. Other than a few items, the action items are listed without any suggestions for an implementation date that would enable the emission reductions shown on page xvi of the Executive Summary. While the items are ranked by the potential for emissions reduction in each action, this is not meaningful if we don't know how these reductions will occur over time, or how they might interact with other actions, and thus become more or less effective.

While the plan does indicate whether the County or other jurisdictions have control over implementation of various actions, it does not always clarify **which non-County governments need to be engaged** for specific actions. It also does not provide draft legislative language, executive action language, or citations of relevant laws, codes or regulations that would need to be changed or amended to enable implementation. These crucial steps would help lay out a pathway for decision makers and advocates as they work to implement actions.

As stated above, many of the actions described in the CAP require significant and far-reaching changes in how we live, move, and interact. Many of these actions cannot be accomplished without significant resources. The CAP needs to be more specific for projected costs for each item. The CAP should also include a section discussing more **detailed options for ongoing funding of climate action**. We will need funding for many of the key actions over many years for them to be effective, and the CAP should provide examples from other jurisdictions and from experts on how to achieve a variety of reliable funding streams to sustain climate action.

No climate plan can be successful unless we are able to accurately measure its progress. Each action item needs a set of **metrics** for analyzing its success at reducing emissions, removing CO2 from the atmosphere, strengthening adaptation capacities, and meeting racial equity and social justice goals.

Presenting a **clear and detailed vision** of what life would be like in 2035 and how the county and the public eliminated emissions by then must be included in the CAP. One example of such an effort was the Sustainable Transportation Vision for 2035 prepared by the transportation technical work group last year. This document is available on the County climate website and we strongly encourage you to consult it as a model.

Comments on specific sections

As stated above, groups within the Coalition may be submitting separate comments on the CAP as well. These comments may have greater specificity on certain issue areas. We urge the County to please review and consider the comments submitted by individual members of this Coalition. They represent a deep knowledge of many issues addressed in the CAP and **we encourage you to draw on them as a resource**.

Racial Equity and Social Justice

We applaud the efforts to include social and racial justice in the CAP. In particular, the plan's section delineating the history of racial inequality in the County and how it impacts climate planning today is well-researched and a solid introduction to this topic. The addition of "equity enhancing measures" across the CAP's actions is another positive step. While this content represents a strong start, these steps are miniscule compared to the actual amount of equitable and inclusive outreach that the County should have done since the beginning of the CAP's creation. We must do even more to make the CAP a truly just and equitable plan.

By choosing to submit a separate request for proposal (RFP) for an analysis of economic aspects of the CAP, the CAP authors have left a crucial piece of social and racial justice out of the plan. The CAP actions can be an important tool to provide much needed jobs and build wealth in historically underrepresented communities in the County. **We urge the economic analysis to take place as soon as possible and to bring low-income, BIPOC, labor, and youth groups in from the start, not only as commenters on an existing plan but as co-creators of that plan.**

We also encourage the CAP authors to reconsider the presentation of social and racial justice benefits on CAP actions as an ancillary co-benefit, and to instead integrate them into the actions themselves. The Public Engagement section follows this path and shows that equity can be embedded directly into the action agenda. The CAP can and should present social and racial equity as themselves central to climate justice. Without the full support and inclusion of historically marginalized communities in support of the CAP actions, successful implementation of the CAP will grow even more difficult and will neglect to seize this opportunity for a just transition to serve these communities in the most meaningful ways.

Energy

The transformation of the energy sector to 100% carbon neutrality is at the heart of all the emissions reduction strategies in the CAP. Electrifying buildings and transportation will not matter, however, if the power used for these sectors relies on fossil fuels. The energy section relies on Community Choice Energy as the primary driving force to achieve this goal. We are strongly in support of CCE and we urge the County to move as rapidly as possible to implement it by advocacy for enabling state legislation and by starting now on development of an implementation plan.

We also support the development of renewable sources of energy within the County, primarily solar. We urge that the County ensure the installation and maintenance work be undertaken within a **just transition framework**, with high wage jobs, training/apprenticeships and hiring from disadvantaged communities within the County,

The energy section does not address policy options to reduce overall electrical use in the County. **Energy conservation is not even mentioned once in the document.** This is a major omission. Energy use reduction is an important step as the energy supply moves towards

renewables. It is also important because, as noted above, a huge increase in electrical demand will be coming in the County as buildings and vehicles are electrified. We urge the CAP to consider including action items on reducing electrical use.

The CAP needs to present an analysis of the advantages and disadvantages of obtaining its energy from sources inside or outside the county. The CAP also needs to discuss the relative advantages and disadvantages of the variety of ways -- conservation, efficiency, solar, wind, geothermal and even hydrogen -- in which the County can transform its economy away from fossil fuels at unprecedented speed. Additionally the CAP has to provide the data and context so that more informed decisions can be made concerning the siting of solar arrays throughout the county.

Buildings

Buildings make up the largest sector of greenhouse gas emissions in the county and hence need to be taken into careful consideration in the CAP. The transformation of heating, cooling and hot water systems in our buildings will be one of the biggest and most daunting challenges of reaching our emissions goals. We recommend passage of green construction building codes, that not only make buildings more energy efficient but that still maintain stormwater laws and regulations that are enforced and not waived. The three key actions for decarbonizing existing buildings, involving regulations, standards and incentives need to be linked together in a logical progression. A similar analysis needs to be done for the new building decarbonization actions.

Buildings are one of the areas where a more systemic analysis would be most helpful. Transforming buildings will be one of the most costly areas of the CAP, but also an area that could help us build systemic change that would create jobs, strengthen our economy, build climate-resilience, build wealth in marginalized communities in the County, and improve air quality. The CAP needs to make a stronger case for all the benefits of building retrofits and propose how they can be a **part of an economic and social agenda for the County** including creating high quality, living wage jobs targeted to disadvantaged residents of Montgomery County.

Transportation

The Transportation actions in the CAP address the core goals of increasing transit service and ridership; electrification of vehicles and a deep reduction in private vehicle mode share. We feel that the plan's recommended 15% decrease in private car modal share by 2027 with no further decrease through 2035 is problematic and likely insufficient. This implies that an enormous number of internal combustion engine vehicles must be replaced with electric vehicles in a very short timeframe with little clarity on how this will be accomplished.

The plan should also include more developed recommendations for reducing vehicle miles traveled (VMT) in the County by all vehicles, including through smart growth land-use strategies

to reduce reliance on private vehicles. In particular, the County should expand its bus and Ride-On system, and make the current free bus service permanent. By evolving car-centric neighborhoods to be walkable and transit-oriented, the County can reduce sprawl, vehicle miles traveled, and the number of single-occupancy vehicles. Reducing vehicle numbers and use will be an important strategy to reduce emissions as the transportation sector transitions to electric power. The land-use and transportation strategies outlined in Thrive Montgomery 2050 should be integrated into the CAP as well, and vice-versa across the two plans. All County master plans should be reviewed and revised as appropriate to assure that their policies and recommendations are supportive of the County's climate goals.

The CAP does not address the **systemic issues that subsidize car usage**, such as highway development and parking minimums for new construction. Streets and roads should be complete, giving priority to pedestrians and micro-mobility as much as possible. The County should adopt a "No New Highways" policy, tailored to both State and County transportation agencies. Regarding proposed state highways (new and expanded), the County should advocate against the creation and expansion of highways by the State Highway Administration, and for maximizing investment in non-car infrastructure. Regarding proposed new County highways, the County should cancel planned but unbuilt County highways by removing them from its Master Plans. Planned but unbuilt county highways include M-83 (Midcounty Highway Extended). As long as planned but unbuilt highways remain in Master Plans, they can be revived and built at any time, and they promote the car-centric focus of existing transportation policies and plans.

Sequestration and Carbon Dioxide Removal

The sequestration of carbon dioxide is an absolutely essential part of the planet's battle against GHGs. However, sequestration and carbon dioxide removal are not and **cannot be seen as an offset to emissions reduction** as the CAP treats it in direct contravention to the Climate Emergency Mobilization Resolution (CEMR). The CEMR states that "all available powers and resources" be used to "transform the climate by reducing greenhouse gas emissions by 80% by 2027 and reaching 100% elimination by 2035" and it goes on to add that we should "initiate large-scale efforts to remove excess carbon from the atmosphere." Thus, any discussion of carbon sequestration should be viewed as an addition to reducing emissions by 100%, not as an offset or means to achieve 100% reduction.

The CAP actions focus on nature-based solutions for carbon sequestration, and a final section, *Reducing emissions sources and potential reduction strategies*, touches on the potential for carbon capture and storage. These are both important for the CAP moving forward, but the imperative, rationale for, and discussion of specific actions, needs to be further developed.

Nature-based solutions for carbon sequestration should be valued and advanced not simply as part of a greenhouse gas emissions strategy, but as the foundation for social well-being and ability to survive and thrive. The co-benefits of nature-based solutions are critical

to the resilience of communities (e.g. food security, water security etc) because they support the resilience of the ecological systems that we depend upon, providing essential life services (e.g. healthy soils, clean air, clean water, pollinator habitats etc), and a buffer to shocks and stresses (e.g. flood management, heat reduction, local food supply etc).

Land-use policy is critical to supporting and sustaining nature-based solutions, yet the CAP does not discuss land use, or present an understanding of how landscapes and ecosystems are connected. This leads to several blind-spots in the proposed actions, including for adaptation and the multiple roles that nature-based solutions for carbon sequestration support resilience over time.

Resilience is an important concept that can inform climate action practice. **The CAP would benefit from integrating a broader definition of resilience** (there are several being used by cities, ecologists and adaptation professionals) that captures the concept that social and ecological systems are interdependent, and need to be acted upon with this understanding. This approach would conceptually, practically, and politically help to tie together the case for a land-use focus, a systems approach, and emphasis on nature-based solutions for adaptation and sequestration. It would go further than the concept of 'environmental stewardship'.

Specific comments on the carbon sequestration actions include:

- The CAP should also incorporate as part of its carbon sequestration chapter a “no net loss of forest” policy that would be an important step towards protecting our natural resources as key climate mitigation and flood prevention measures.
- It is difficult to ascertain the amount of GHG reduction that would be obtained by the proposed actions in the Carbon Sequestration section as the CAP does not estimate the number of tons of carbon dioxide that could be sequestered by following these actions.
- The CAP should recognize the importance of local food reliance and the extent to which this could contribute to sequestering carbon through farming practices. We are only now beginning to envision and to implement the potentially large role that our Agricultural Reserve and our local urban and suburban gardens can serve to increase local food supply through regenerative agricultural methods. Not only will encouraging farmers to grow more table, fruit, and nut crops sequester more carbon in their soil, but it will reduce costs and improve their profits. Additionally, as climate impacts worsen and affect global and national food production and distribution, and as the energy costs of food delivery from outside our region increase, local food production will become increasingly more important. The CAP should encourage local food self-reliance by advocating for appropriate training and education for residents, farmers, and businesses. The plan should help farmers find local markets for their crops. For example, the County could require local food operations to purchase a percentage of their food from County farmers. The option for contract growers through the County’s Farm to Food Bank program, that has now provided grants to 22 producers in the Ag Reserve to help them

ramp up supplies of table crops to Manna Food Center and other area food banks, is a prime example of the expanded role of the Ag Reserve in supplying more local food.

In addition to the proposed actions for sequestering carbon, the County should take advantage of the significant opportunities available to catalyze the development of promising technologies of carbon capture and storage such as synthetic limestone for use in concrete, a variety of biochars for use both as soil amendments and for incorporation into a whole range of products, the use of the mineral olivine to sequester carbon dioxide on beaches and elsewhere, as well as iron fertilization of oceans, and seaweed farming. Advancing these technologies through public awareness, procurement, and even direct investment should be considered.

Adaptation

The climate adaptation section of the CAP presents a well-developed set of actions for strengthening the physical infrastructure of the County to cope with extreme heat and increased flooding. The focus on green infrastructure and green streetscapes, mold prevention and removal, the creation of a network of resilience hubs, and the support of climate adaptive technology and sustainability permits, offers important adaptation strategies. We also support the increased attention to the need to replace aging infrastructure at a quicker rate due to more intense precipitation events. Requiring solar, green, or cool roofs and permeable pavement is also to be commended given co-benefits including minimizing the urban heat island effect and filtering stormwater onsite. However, green infrastructure must be designed in coordination with upgrading the design of the County's drainage and stormwater policies and standards to manage more intense precipitation. If well implemented, these actions can serve as a regional model for adaptation plans.

However, the CAP Adaptation section lacks the systemic analysis that we see as essential for all parts of the CAP. Climate change will bring a huge range of likely changes to both our physical environment and to the ways in which people interact with, and are affected by, that environment. Climate-related disruptions will affect people's ability to work, travel, and function normally. Local food, water and health systems may become less reliable. These struggles will also affect people's mental health. We urge the County to consider a broader definition of adaptation, one that not only prepares culverts, hospitals, and roads for climate disruption but also prepares the people who rely on those systems for their well-being. We will need human and social resilience as well as physical resilience to maintain cohesive communities in the era of advancing climate change. A stronger emphasis on nature-based approaches to adaptation is needed, and could be better integrated by adopting a broader understanding of resilience and how to strengthen resilience as proposed in the sequestration section.

To summarize, the adaptation section ignores the political, social, economic and psychological/emotional destabilization that increasing climate chaos will likely bring to the County. One issue of many -- migration -- alone could change the face of the county before too long. The CAP must address these issues as they will inevitably grow in importance as the climate crisis accelerates over the coming years.

Governance

It is commendable that there is an entire section focused on Climate Governance Actions, and that these actions describe specific initiatives to institutionalize ‘combating climate change’ in the County government. We particularly support the creation of a climate change academy providing training both to county staff and ultimately the public, as well as the creation of a climate innovation lab and a climate ambassadors program, a centralized climate data center, and creation of a comprehensive center of metrics and evaluation criteria. We would also like to see more on the ground community based actions around CAP.

As with other parts of the plan, these actions need to be articulated in terms of priorities, sequencing, timeline, estimated staffing, and other costs.

In addition, the CAP needs to articulate, or be accompanied by, **a decision-making framework** that provides rules of the way forward. Addressing climate change presents a profoundly complex problem. As such, the County government, Council and other elected officials, as well as key stakeholders ranging from business to civic leaders, need the education and tools to be able to navigate ways forward.

A decision-making system would comprise:

- **Implementation of a climate test**, such as the one listed in the CAP, would serve as a screening mechanism required for all major operational, budget, capital investments, and regulatory actions to assess impact on, and opportunities for positive contribution to, the County’s emissions and carbon dioxide removal goals;
- **A statement of principles and values that guide decision-making**, acknowledging that all actions take place in dynamic and complex interacting systems. Such principles might include: seek to promote racial equity and social justice; uphold the precautionary principle; make every effort to preserve and protect the rights of future generations; and protect and enhance biodiversity and ecological systems. Another critical climate action principle would include that direct and indirect efforts to sequester carbon should not be treated as an offset, or a way to avoid reducing the County’s greenhouse gas emissions to net zero.
- **Framework for applying systems analysis for decision-making**, which encourages decision-makers and stakeholders to focus on solving challenges collectively. A range of innovative and proven climate solutions exist; but the design of contextually-appropriate policies, programs, and incentives for implementing solutions requires systems analysis. At a minimum, any framework for decision-making should provide for assessment of potential trade-offs and co-benefits of an action in relation to other concerns outlined in the statement of principles.

Individual Actions

Once the CAP is finalized, it will require the concerted efforts of ALL county residents to reach the GHG reduction goals set forth in the plan. The pandemic has provided an example of how

communities pull together in the face of great challenges to render assistance. The CAP will require a long-term commitment to this ideal.

The CAP section that describes actions that individuals can take to reduce their emissions contains many admirable suggestions. However, this section feels incongruous in a document that is proposing so many sweeping changes to daily life in the County. The suggested personal actions need to be linked to the relevant CAP actions. It also omits the single most important action that any person can take on climate: to recognize the reality of the crisis (as painful as that can be) and to advocate and demand societal action at all levels. A systemic approach would look at how individuals can act in response to -- and in coordination with -- the CAP actions as they are implemented.

This section also needs to be interacting with the Adaptation actions in a more systemic way. For example, how can individuals build their own personal resilience and ability to cope with climate disasters and the stress and chaos they may cause? Instead of solely individual actions, the CAP should focus on how individuals can be healthy and flourish in a world of climate change while becoming advocates for and agents of societal change themselves.

Public Engagement

Community engagement is crucial for the success of the plan, and this section has strong suggestions for building out existing partnerships. As stated earlier, we highly commend you for embedding the social and racial justice benefits into the climate actions in the Public Engagement section. We support the recommendations to engage students and young people through Montgomery County Public Schools and other institutions. We also particularly like the emphasis on maximizing involvement of the arts, of federal agencies, the convening of a climate assembly, and the involvement of community organizations, as well as engaging with the public through a public health/climate lens. It is vital, however, that we significantly increase our climate communication capacity and planning. The climate emergency, like any societal emergency, requires government to have clear, focused, culturally relevant, and outward-facing messaging and communications plans for the public. The County needs to honestly and fairly communicate the urgency of the climate challenges and mobilize the population to engage and commit to climate action on a variety of levels. In many ways, this is the most important part of the CAP as an engaged and informed public is key to building the political and social will to enact the CAP action reforms.

For too long, much public engagement around climate change has been inadequate and sometimes even counterproductive. An excessive focus on individual actions around personal behavior and carbon footprint reduction has diverted attention from the systemic policy changes needed to address the crisis. The sheer amount and intensity of climate-related disinformation has made it difficult for even strong public engagement efforts to make an impact.

It is important to identify, in this section, how you will use various forms of mass and social media to communicate with the public on climate. The County should develop a coordinated

strategy and action plan for social media platforms, advertising of various kinds, and other advertising materials to communicate the urgency of action on climate and how individuals, businesses, faith communities, and other organizations can contribute. It is crucial that the public information program around the CAP use evidence-based and scientifically documented strategies to mobilize the community to climate action. Health of citizens and their children is one such well studied focus to impel people to climate action. Health impacts of climate change such as air quality and increased allergy vulnerability are key ways to open conversations on climate.

One key question missing from this section is how the County will set policy around climate disinformation. For example, County communications on climate could directly address fossil fuel company disinformation on climate, particularly if those companies do business with the County or in the County more generally. The friction created by addressing disinformation brings into wider view the county's own investments for public employees that have failed to divest from fossil fuels.

Conclusion

We thank all the County elected officials, staff, consultants, community volunteers, and so many others who worked to make the CAP come together. We recognize the challenges of creating a County climate plan in the midst of so many other crises: a global pandemic, an economic downturn, yet another chapter in our country's struggles for racial justice, and threats to our democracy itself.

The climate crisis, like these crises, is urgent and likely catastrophic. Yet the County response embodied in the CAP is not easily actionable, with few projected costs, no financing strategy or timeline. It only describes an 83% reduction in GHG emissions, thus not meeting the CEMR 100% emission reduction goal, much less meeting the goal of large-scale removal of CO₂.

Three years after the County declared a climate emergency the County still has not taken adequate action. We call on the County to review and alter the CAP's presentation to focus its recommendations not only on a set of actions that must happen, but on the systemic changes that need to happen across our entire County — at emergency speed — in order to build a just and sustainable community. The CAP does not only have to express a set of actions and metrics. It needs to be a statement about a new and real dedication on the part of the County to address this crisis, and to offer a vision and an actionable path to transformative change.

The citizens of Montgomery County need a plan that is detailed enough to be implemented and a legislative and executive action package based on that, ready to be implemented immediately. As organizations and individuals in the County, we are committed to partnering with the County government to achieve this and to make a thriving, equitable, safe, and connected County a reality. Without these sweeping changes recommended in our comments, we will leave the youth of this county with an unlivable climate. Our lives are on the line, and our communities are on the line. Montgomery County needs to follow-up on their words with policy and action.