

Subject: FW: Comments on CAP

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From: Climate

To: Wejnert-Depue, Camille, Kallgren, Sarah

From: Gary Ender [REDACTED]
Sent: Sunday, December 27, 2020 3:21 PM
To: Climate <Climate@montgomerycountymd.gov>
Subject: Comments on CAP

[EXTERNAL EMAIL]

To the concerned officials,

Let me congratulate you on the great amount of thought that went into both the process and content of this draft plan. Following are my comments.

- EVs: I drive one (Chevy Bolt). While build-out of charging infrastructure is important, with education residents can learn that a very high percentage of their regular trips can be taken on the amount of charge available in almost any EV or plug-in hybrid. At the end of the trip they can very often simply recharge at home. Currently there is a major lack of information about the potential of electric vehicles (even among those selling them!) that needs to be rectified very quickly. In the absence of relevant, experience-based information, potential EV buyers are likely to unnecessarily experience "range anxiety." Please ensure that such a program of education is available and publicized widely to County residents (this is mentioned briefly on p 115). More specifically, there seems to be an assumption among EV sellers and others that either one is convinced about buying an EV because one is a "tree hugger" or one is just not going to give up the habit of gasoline. In fact, I believe most people are potential EV drivers, but they need information and reassurance about the convenience that actually exists, even largely in the absence of charging infrastructure away from home.
- PEPCO has sometimes talked about an incentive program for EVSE that would offer reduced electric rates for the charging of EVs. I recently installed a 240 (level 2) charger. I applied for the PEPCO rebate, which requires that the system have WiFi so that PEPCO can collect information on my use of electricity to charge my cars. However I cannot find any information on what PEPCO plans to do with this information. In particular it could obviously be used to establish the kind of program I describe. Regular use of electricity would remain at the usual rate, but EV charging would be removed from the total and charged at an incentive rate. Please inquire directly to PEPCO and the PSC to ascertain the status of any such program that might be in the works and encourage them to establish it if it is not already planned.
- As part of driving an EV, one wants to know to what extent this is contributing to climate change mitigation. To do so, one must understand the net fuel mix going into generating the electricity used to charge an EV. PEPCO publishes the fuel mix of the PJM grid as the answer to this question, but in fact Maryland law requires the purchase of Renewable Energy Credits by entities like PEPCO as part

of its program to lower emissions and achieve its targets. The true fuel mix should take account of the use of these credits by PEPCO and other electricity suppliers. Please ensure that this kind of information is available to those considering the purchase and use of EVs and electric appliances. This is consistent with the text on p. 195.

- I searched for the terms mower, blower and landscape in the plan to see if there was any intention to adjust through policy what kinds of landscaping machines will be permitted. I could not find any mention of these. I use a wonderful electric mower, and an excellent electric blower. The landscapers and "arborists" use gasoline-powered tools that are often noisier than the current country decibel limits. We could derive at least some benefit for both climate and sound pollution by incentivizing or requiring landscapers and arborists, and residents, to move away from gasoline. I am currently sharing my mower with three neighbors, so four gasoline mowers were put out of work by this mini-coop. This kind of action could be mentioned on p. 211, Actions for Homeowners. The County takes this general concept much further in proposing the brilliant Electric Vehicle Car Share Program for Low-Income Communities. Bravo!
- If a program like this does not already exist, there should be encouragement and subsidies to low-income families to switch from incandescent bulbs to LEDs. LEDs are now quite affordable for families with higher than low income, and they use much less power to create the same amount of light. Their extremely long lifespan easily justifies their purchase and use for those who can afford it, and the County should ensure that they are within every household's reach. Using LEDs is recommended in the draft plan to businesses but not to homeowners. Everyone should be encouraged.
- I agree with the desirability of providing incentives and disincentives that lead to the purchase and use of EVs and EVSE. In section T-3, these are discussed, but there is no mention of the federal and state incentives that already exist. With more limited resources, the County should be sure to coordinate its program to ensure that it is not providing an incentive to potential EV buyers (like me) who were already sufficiently incentivized by the federal and/or state incentives. On the other hand, the federal and state incentives, if not extended and/or reauthorized, might be expiring, so the County incentives might be even more important.
- As suggested in Table 8, I read the section, Zero Waste Task Force Planning and Initiatives. The purpose of the objective, "Ensure no paper waste is sent to landfills and no plastic waste is incinerated," is not clear to me. I can imagine various connections between paper and plastic waste on the one hand and GHG emissions on the other; the ones that the County has in mind should be mentioned to support this objective.
- Re Buildings, Table 14 and the adjacent chart: It is not clear why only 1.2% of the reduction in emissions comes from new buildings. Is it because the anticipated level of construction is very small compared to the existing stock? One would think the new regulations and standards would ensure that the new buildings have zero or very greatly reduced emissions compared to the existing stock. ● Has there been any examination of the risk in putting virtually all energy use into the form of electricity? Reducing emissions is urgent, but providing a reliable supply of energy is also critical to the County's economy and the health of its residents. Alternative energy sources, like fossil fuels, whatever their emissions profiles, have the virtue that their availability is not necessarily correlated with that of electricity. Thus if there is an outage of electricity, fossil fuels may provide a backup source of energy, e.g., in the form of diesel for generators or natural gas for cooking and heating. I do not advocate retaining fossil fuels; I am urging the County to be prepared to defend its putting all of its energy eggs into one basket. While the County does not have authority over the electric grid, it might be able to cite improvements or the like to the resilience of the grid. This is an engineering but also a national security issue.

- P 105: "Currently, Montgomery County's Building Energy Benchmarking Law requires owners of nonresidential buildings over 50,000 square feet to annually benchmark their building energy use and report it to the County for public disclosure. Benchmarked buildings in the County receive an energy reduction of 2% each year. However, relying on transparency requirements alone is not [going to] be enough to generate the drastic emissions reductions needed in the commercial sector."
 - What does it mean to "receive an energy reduction of 2% each year"? Does that mean that the standard gets "tighter" each year?
 - The last sentence has some words missing.
- Figure 32 and Table 18 are difficult to understand. In particular:
 - One of the cells of Table 18 has text, whereas intuitively it seems that it should have a number
 - It would be very helpful if the text did more than introduce the table; it should explain what is in the table and its meaning. It is difficult to understand how the totals and percents relate to each other, partly because the numerator and denominator used to calculate the % are not both shown.
 - The titles of this figure and table refer only to the SVI case > 50%, but in fact they both show information related to both > and < 50%.
- Table 19 discusses changes in governance and uses the terms "evaluate and update." Monitoring should be added to these actions. Evaluation is an in-depth, serious activity that requires considerable effort and expertise; if done properly it can assign causality to actions taken. Monitoring does not assess in depth and assign causality, but it serves to keep program managers and citizens aware of the types of progress being made. Monitoring requires a set of indicators for which data are easy to collect and that are relevant to the program. Monitoring and evaluation should be conducted as complementary activities; monitoring information can help tell the story of a program's effects that lead to the hoped-for impacts that should be assessed by evaluation.
- Finally, as a very concerned (about the impacts of climate change) County resident, I would be happy to serve or contribute to the finalization and/or implementation of the CAP. I am retired, trained as an agricultural economist, have led a major study on the impact of climate change (on agriculture worldwide), and have years of experience designing and implementing monitoring and evaluation systems.

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