February 28, 2021

To: Adrianna Hochberg, Assistant Chief Administrative Officer and Climate Change Coordinator, Dept. of Environmental Protection, Montgomery County MD

Re: Commenting on the Second Draft, Climate Action Plan

The League of Women Voters of Montgomery County would like to commend the Council on beginning the process of addressing climate change in Montgomery County. The extent of the work needed to produce such a wide-ranging plan in a noticeably short period of time for consideration by the public is appreciated.

Below are some general perspectives as well as areas with specific comments:

**Overall:** There are several overarching issues that we believe should be addressed:

1) The Climate Action Plan (CAP) presents a broad set of strategic goals to be accomplished by 2035 which can appear to be aspirational in nature and do not sufficiently address concrete remedial steps. We understand the need for flexibility over time to allow for changing conditions, especially when considering rapidly improving technology. While an annual timeframe of activity was promised during the discussion of the plan, we believe that providing a set of actions that establish both short-and-long range milestones and metrics will enable progress to be better measured and will increase the support from the public needed for success.

2) The CAP emphasizes the reduction of greenhouse gas emissions. It also needs to address the drawdown of the current level of contamination in the atmosphere.

3) We applaud the recognition of the need for increased equity in providing solutions to climate-related consequences. We believe that broad access to the internet in low-income neighborhoods and a strong outreach and education program to increase participation in the planning and implementation of the CAP will strengthen inclusion. It is imperative that all of Montgomery County’s residents have access to safe living conditions as weather becomes more severe.

**Finance:** There are several financial issues related to the implementation of the CAP:

1) How will the actions of the CAP receive adequate funding?
   a. Public/private partnerships have been mentioned many times as being essential to the success of the efforts to meet the goals of the CAP. However, these partnerships generally result in the costs being passed down to the users. How will these costs/fees be controlled?
b. Frequent mention of incentives has been made. Given the likely cost of the proposed changes, has consideration been given to the effect on the County’s overall budget?

c. The Green Bank has already been established. Stronger outreach should be considered to promote awareness of the Bank and how it functions.

2) Many of the points in the plan will also require electric transportation and the retrofitting of commercial and residential buildings in the County. Will there be an effort to project the cost of the necessary changes to the average resident of the County? One-size-fits-all would not work for this exercise, so scenario projections would be needed. Given the potential burden to residents, they should be given the opportunity to plan for the expense.

**Emphasis on Electricity:** There is an overarching emphasis on the conversion of current energy sources to electricity.

1) The County personnel who are responsible for the development and implementation of ongoing actions in connection with the CAP have acknowledged that the conversion of the energy grid to clean energy will be difficult and may require the County to take control of the grid if acceptable agreements cannot be made with existing providers. Given that this would be a new effort for the County, more detail should be provided on the plan for successful implementation.

2) To address the Community Choice Energy program, the plan should include some action regarding the climate-safe production of electricity, not limited to the County.

3) Investigation of new technology would also be appropriate for dealing with the greenhouse gas reduction challenges.

**Energy conservation and efficiency:** We believe the CAP does not give sufficient attention to energy conservation and efficiency. For example, the plan could include ways to make existing housing more energy efficient.

**Transportation and land use:** The graph of greenhouse gases illustrates that to-date the number one polluting sector showing the least improvement over time is transportation. The two other largescale polluters (households and commercial energy) have seen reductions; transportation has to a much smaller degree.

Based upon the above observations LWVMC makes the following recommendations:

1) Instead of emphasizing electric cars and personal vehicles (18 pages), focus instead on increasing the use of electric mass transit and transportation-demand management (6 pages).
2) Electrification of personal vehicles is costly and does not serve all the Montgomery County population, making it an equity issue, but electrification of transit vehicles serves everyone, those who use it as well as all who benefit from a cleaner community.

3) Parking fees, vehicle miles traveled, congestion pricing, and making transit more attractive will help reduce the use of personal vehicles (even electric ones). Electric cars won’t solve congestion.

4) Dedicated bus lanes, greater tax subsidies for use of transit, frequent transit schedules with a redesigned system that serves all communities in the county will help make transit more attractive.

5) Additional active transportation suggestions include more and better bike lanes, more sidewalks, more shady walks with trees, etc. Both aesthetics and the climate can be addressed with active transportation.

6) Emphasize compact land use to encourage residents to rely less on travel in their daily lives. This requires good planning -- and the Thrive document developed by the Planning Department is an important step in that direction. The climate document should include--but does not--an entire section devoted to good land use.

7) The CAP and THRIVE 2050 place emphasis on the greater use of public transportation and on the building of more multi-family structures to allow for additional green space. Given the lessons of the current pandemic and the projections for future events as the climate warms, are contingencies being developed if there is a future need to limit gathering in congested areas?

Community/public engagement: The real urgency of the climate challenge has not been conveyed to most of the public and should be included from the start to engage the community to commit to climate action in a variety of ways. As we have noted earlier, the County needs to offer a vision and an actionable path to transformative change. Systemic policy changes, in addition to individual action, are needed to address the crisis, and an informed and engaged public is key to building the political and social will to respond to the climate emergency.

The plan calls for “coordination and collaboration”, but detailed information to accomplish this goal is not available in the plan. We believe that expanding the reach of the engagement with the public to include such vehicles as increased traditional media and social media exposure, creating a broader set of alliances with faith and community organizations, developing curricula for use in the schools and other organizations that provide educational programs, utilizing the libraries and other county facilities and their outreach programs, and the development of tools that will resonate with County residents who have limited access to online communication vehicles is essential.

Public commitment is necessary for the CAP to work effectively. The League of Women Voters of Montgomery County has a long history of experience working with the public and is certainly willing to help in this area.
Administration: Given the vast amount of effort that will be needed to implement the CAP, should consideration be given to having a separate County climate department or division to address this essential global issue?

Sincerely,
Kathy McGuire and Diane Hibino, Co-Presidents

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