The Montgomery County Civic Federation, Inc., comprised of homeowner and civic groups throughout the region owes a debt of gratitude for the immense undertaking that culminated in the creation of the county draft Climate Action Plan. We commend County Executive Marc Elrich, Assistant Chief Administrative Officer Adrianna Hochsberg, County staff, dozens of volunteers and the contractors who compiled the deliberations into the draft document. We stand ready to assist with activities to support countywide efforts to reach our shared goals.

MCCF recognizes the global climate emergency, the crisis it has become, and commends the County's goals to cut its greenhouse gas emissions 80 percent by 2027 and 100 percent by 2035. We know that this goal is an important and ambitious one, and we call upon all of the county’s stakeholders, public and private, to work together to achieve it. It will be a massive undertaking and will place us squarely in the national spotlight to inspect how we proceed and whether we succeed. We cannot backtrack from this watershed moment and we will not fail! But to meet those goals, we agree with others that success hinges upon a rewrite of the CAP that changes it from a list of worthy goals into a targeted, focused analysis of the interrelated paths we need to take to reach these goals.

“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. 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.” TCM CAP Coalition 02/22/21

To begin, there must be greater urgency communicated in this plan to the need for immediate action to avert the worst impacts of the crisis that we face. The science continues to build across many disciplines that the climate crisis is worsening with the current increase in global average temperature. 2020 was the warmest year on record. We cannot expect the citizens of the county to make sacrifices in their daily lives, if they don’t understand how serious the climate crisis has become.

Dozens of groups from the region have worked on providing meaningful comments to the draft CAP. If you have not seen the document, you can download it here: file:///C:/Users/Owner/Desktop/CLIMATE%20CHANGE/MONTGOMERY%20COUNTY/MC%20CLIMATE%20ACTION%20PLAN/PRINTABLE%20CAP.pdf.

We commend the work of those analyzing the CAP during the comment period and the countless hours of volunteer time that have gone into providing meaningful analyses of where the CAP succeeds, where the CAP falls short and how it can be improved. The finalized CAP will form the backbone of this county-wide effort and it must be a clear road map for how we achieve these goals. At present it lacks clarity and definition and metrics for measuring our success.

Some of the essential work outlined in the CAP can begin now, before we hammer out the final document’s verbiage, but we need decisive leadership at the county and state levels to quickly move from goals into formulating and implementing executive orders, legislation and encouraging private efforts to support the goals. The draft CAP neither contains a legislative priorities list, nor does it
indicate what entities would shepherd these actions. The draft CAP also contains no discussion of the budgets and staffing requirements needed for these activities, and how we’re going to pay for these actions and in what time frames. While we cannot control what the state or federal governments can do, the County can and must move with alacrity to implement the provisions that are purely local.

The Civic Federation, among other groups, joined with The Climate Mobilization Mo Co CAP Coalition to review a much more substantive analysis of the draft CAP and those comments can be found here: https://docs.google.com/document/d/163O-4ZchHNawTdj4LF4k39wsJGb4CuntRakjBLF3Hm0/edit along with a list of the organizations that have also supported this effort.

The following represent a number of specific concerns that the MCCF feels the County should consider when reviewing the public comments that have been submitted on the CAP. These are just a handful when compared to the immense complexity of the overall plan.

The Clean Energy, Building, Transportation and Public Engagement Sections deserve the priority attention indicated in the draft, but they need much greater detail, and as noted above, a specific roadmap on how implementation will proceed and succeed.

MCCF emphasizes the importance of public information and community engagement, but as of this writing the county has no targeted communications plan in place to even begin informing citizens of the massive undertaking that awaits us. Much of this effort can and should begin immediately and need not await finalization of the document.

The county’s quasi-government agencies and private enterprises should not be insulated from the behavioral shifts that climate science dictates should be made. While MCPS has committed to the purchase of electric school buses, the continued use of synthetic turf represents the antithesis to achieving the goals of the CAP and ending the extinction crisis. CFNlatest.pdf (montgomerycivic.org) pp. 15 and 7.

ST fields are immense heat islands. 2020 was the hottest year on record. ST poisons water with a host of toxic chemicals. These plastics pitches are point sources of pollution for micro-plastics that infect aquatic watershed that flow to the Chesapeake Bay. They emit the GHGs methane and ethylene from the moment the sun shines upon them and the off-gassing never stops. The plastics in these fields literally never stop giving off hydrocarbon gasses. Old fields are now being dumped around the nation and world where they continue to pollute and poison aquatic and marine resources. One of the toxic substances that leaches from ST, per- and polyfluoro-alkylated- substances, or PFAS, has been found in rockfish, oyster and blue crab fisheries of the Bay. Public Employees for Environmental Responsibility conducted one of the studies, More PFAS Found in Maryland Water and Seafood - PEER.org. Potomac Riverkeeper also studied Antietam Creek and found similar results in aquatic species that humans consume: https://www.potomacriverekeepernetwork.org/troubling-findings-of-forever-chemicals-in-antietam-creek/ Science has also revealed the presence of elevated levels of PFAS in both Bethesda and Poolesville drinking water.

The revised CAP should lay out the reasons for placing a moratorium on building new synthetic turf and poured-in-place playgrounds and banning reinstallation of the same. It’s time to take us back to top-of-the-line grass fields. We cannot keep wishing that the state of our environment and drinking water will improve with these toxic pitches in play. Montgomery County Public Schools and private schools
throughout MC must come to terms with the science and stop selling lies to unsuspecting parents about the never proven “greatness” of ST.

The CAP should identify areas where the idea of low-hanging fruit and public involvement can be combined. An example lies in the CAP goal to electrify residential and public and private buildings. While there are many ways the county and state could act to provide incentives, a targeted outreach campaign to county residents could spur early adopters to make it happen now. But anyone considering the change will undoubtedly have numerous questions. The County could create an online hub with resources and answers to kick start action.

The same type of resource can be developed for the installation of geothermal assisted heating and cooling systems, but the draft CAP makes no mention of how geothermal systems fit in the mix of tactics to accomplish our goals or how to integrate county and state legislation to support it. On Feb. 25, 2021, Del. Lorig Charkoudian’s bill HB 1007 had a hearing before the House Economic Matters Committee on whether geothermal should be given a Tier 1 ranking within the state’s Renewal Portfolio Standard and create other changes that would support expansion of geothermal in MD. A senate companion bill SB 810 is sponsored by Sen. Brian Feldman. The CAP should state the county’s intent to support these legislative efforts.

The CF remains concerned about the county’s tree canopy, which should be an integral part of supporting a livable environment. The CF has staunchly defended the need to protect trees for many years and has long noted that development illegally removes more canopy than should be allowed. The CF advocates that all entities signing development applications should do so under penalty of perjury. The legislation, MC/PG 106-19 can be seen here: CFN201901.pdf (montgomerycivic.org) pg 11. It would require an applicant who seeks to subdivide land in the County to certify under penalty of perjury that development documents are true, correct, and complete to the best of the applicant’s knowledge. Details about the county’s reforestation plans must be laid out more comprehensively in this plan.

Lastly we need to know the details on how we reach CAP goals for transportation mode shift among our more than 1 million residents. How do bicycles, electric scooters and other examples of micro-mobile transportation fit in the plan? If someone commutes regularly to work by bicycle, what sort of tax credit could they seek, and what incentives could be developed to make this mode shift more commonplace?

We know the draft CAP is not final and much work remains to create the roadmap with all of the details fleshed out that will make us successful. The MCCF stands with our county and its leadership, and our state and federal leadership to make the CAP a success story that the rest of the nation can emulate. We need much greater detail, however, for us to reach the goals laid out in the Montgomery County Climate Emergency Mobilization Resolution of 2017:

On December 5, 2017, the Montgomery County Council adopted Resolution 18-974, Emergency Climate Mobilization. “This resolution calls upon the national Administration, the Congress, the State, and other local governments to join Montgomery County to use all available powers and resources to reduce greenhouse gas (GHG) emissions by 80 percent by 2027 and 100 percent by 2035. The resolution further calls upon the County Executive, Montgomery County Public Schools, and the Maryland-National Capital Park and Planning Commission to advise the County
Council on “specific methods for accelerating the County’s greenhouse gas emissions reduction goal.”

The County joined the ranks of climate activism more than three years ago with a resolution. Now it’s time to join the big leagues with action across numerous fronts. The draft CAP must evolve to become the brain trust that takes us there. Citizens from across the county have lent considerable effort to analyze the draft CAP and make meaningful and important recommendations to make it successful. Earth Day 2021, April 22, could be the day that the genius born of this collaboration is unveiled to the region and the nation. The Civic Federation is committed to this work for the duration!