

Subject: FW: Dra(MoCO Climate Ac4on Plan is misleading in current form
Date: Monday, January 25, 2021 at 6:35:49 PM Eastern Standard Time
From: Climate
To: Kallgren, Sarah, Wejnert-Depue, Camille

From: [REDACTED]
Sent: Saturday, January 9, 2021 11:41 AM

To: [REDACTED]
[REDACTED]
Cc: [REDACTED]
[REDACTED]
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[REDACTED]

Subject: Dra(MoCO Climate Ac4on Plan is misleading in current form

[EXTERNAL EMAIL]

Hi Adriana,

Happy new year to you and all of your colleagues in Montgomery County!

Thank you for your work on this draft. I recognize that this was a huge task. I sincerely appreciate all the work that went into it and under very challenging circumstances.

However, I am afraid that the report, as written, is misleading to the public and the many stakeholders in the county. This must be corrected immediately.

A not very careful reader of the report will assume that the county will be fully implementing all of the many actions listed in this report, do so immediately, and ensure robust funding, staffing regulation, and legislation, as needed. A more careful reader, however, will see that the report:

- commits the county to almost none of the many actions listed in the report fails
- to indicate how robust the actions would be if implemented fails in most cases
- to indicate if resources or regulatory authority will be provided fails to show
- what actions were modeled to achieve the GHG reductions, and
- fails to indicate when the county would implement the actions

The draft report and the appendix are missing the assumptions and inputs that the modelers used to achieve the 80% GHG reduction by 2027 and the 100% GHG reduction by 2035 and what GHG reduction outputs the various input policies and programs achieved. It's impossible to properly review the outputs of the model without this information. Can you please post these assumptions

and inputs and GHG outputs immediately to the county's climate website so we can all see what policies and programs were used to achieve the 80% and 100% GHG reductions in the report's charts?

For example, on page 114 of the report, the chart shows nearly an 80% GHG reduction in transportation GHG by 2027 and 100% reduction by 2035. How was this achieved? What specific "T3 Private Vehicle Electrification Incentives and Disincentives" from the county on Table 15 was used by the modelers? When does that policy kick in in the model? What GHG reduction did it achieve in the model? The same goes for all the transportation and other sector "actions" in these tables.

To take the same example, as you know, minimal vehicle electrification incentives and disincentives will do little to cut GHGs, calling into question the results of the model. If the only way for the model to show a 100% GHG reduction by 2035 is through significant incentives and disincentives (or other policies) and that's what was assumed in the model to achieve 100% GHG reduction, then the public and stakeholders need to know so we can insist on the adoption of such policies when the plan is implemented.

The report is filled with vague language that does not make it clear if the plan specifically calls on the county to implement specific policies/programs, what the specific policies/programs would be, what funding/staffing/regulatory authority would be provided, and/or when such a policy would be implemented. See below a preliminary list of such vague and potentially misleading statements in the report. Can you please replace all such vague language in the report so the public and stakeholders will know specifically what the county will and will not do if the report is adopted by the county?

Also, the MoCo website for the draft report seems to be missing an email address that stakeholders should use to submit comments along with an invitation to comment. Or, if there is such an email address or invitation to comment, I couldn't find them. Can you please fix this immediately? I think that you would agree that the absence of such information sends a bad message to stakeholders. Thank you,

Stephan cell [REDACTED]
[REDACTED]

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The report is filled with vague references to legislation or regulations without calling for the county to enact specific legislation or regulations and at a specific time. Here are examples of the vague references to legislation and regulations:

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- “zoning ordinance” for EV chargers “could be expanded” page 129
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- “Employers could be required to provide transit incentives (page 118)
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- “A combination of voluntary measures and strict code requirements are required” (page 93)
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- “The county could amend the building code” (page 93)

“These (commercial building) standards should continually increase in stringency” page 105

- “The Building Energy Benchmarking law could also be amended” page 105
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- “Montgomery County will need to amend the building code to require all newly constructed buildings in the county to be net zero energy starting in 2030” page 110
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- “The county could use variable tax and licensing fees (to promote EVs)” page 121
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- “The county could also implement a revenue-neutral feebate program” page 122
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The report does not say that the county will ensure that major environmental legislation, investments, and funding are aligned with climate goals. It is missing a basic county commitment such as, “The county will immediately establish a process to ensure that no significant legislation, capital investment, or operating expenditure is misaligned with the county’s GHG emissions reduction goals. Any draft legislation or funding not aligned will be rejected and revised to align with the climate goals.”

This report should call for specific funding and staffing actions by the county, commensurate with the goals above such as “The county will provide \$1 million in funding and 3 FTE staff to ...” or “The county will provide the funding and staff necessary to ...” Instead, the report makes many vague suggestions on the need

for funding (see below). The only specific calls for funding are the following but the report fails to indicate if these calls apply the county or other government and fail to name funding amounts:

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- Page 104, “Provide financial support (such
- as partial or full subsidies) to low-income households” to electrify appliances
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- page 109, “Provide financial support to help pay for the cost differential between natural gas heating
- and electrical heating” but fails to name a specific approach such as a subsidy or formula for the
- incentive.
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- Page 129, “Subsidizing the purchase of
- home chargers in low-income and multi-family housing is necessary”
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- Page 134, “Provide subsidies for small
- to medium businesses that fall under specific revenue thresholds (for off-road vehicle electrification)
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- Page 156, “Develop an incentive and/or
- subsidy program for financial support to landlords and low-income homeowners to retrofit buildings with energy efficiency adaptive technologies
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The report contains many other vague references on funding below. To be credible, they should be written as with statements like, “The county will invest <amount or range> by <year> to incentivize private vehicle electrification.”

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- “Expand public transit” page 116
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- “Expand active transportation and shared
- mobility network” page 116
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- “Private vehicle electrification incentives
- and disincentives” page 116
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- “Electrify public buses and school buses”
- page 116
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-
- “Expand the electric vehicle charging network
- page 116
-
-
- “Consider ways to offset the cost premium”
- page 91
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-
- “Ensure the costs of installing solar ...
- not passed onto” page 93
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- “Expand free transit access to vulnerable
- groups” page 118
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- “Consider subsidies for households whose
- incomes depend on driving page 121
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“Low income families that buy EVs could receive a reduced or eliminated County energy tax” page 129

“The County should consider providing incentives or subsidies for residents of low-income housing and rental properties to reduce energy and water use” page 157

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- “The county would need to provide financial support for low-income households and small and minority-owned businesses (for roofs) Page 159
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On Mon, Dec 14, 2020 at 3:28 PM [REDACTED]

Dear Climate Workgroup members, members of the Climate Energy and Air Quality Advisory Committee, community leaders, and Resilience Ambassadors:

I’m pleased to share that County Executive Elrich released the Montgomery County Draft Climate Action Plan today. The Plan is available at: [MontgomeryCountyMD.gov/climate](https://www2.montgomerycountymd.gov/mcgportalapps/Press_Detail.aspx?Item_ID=28268) and the press release can be viewed at:

https://www2.montgomerycountymd.gov/mcgportalapps/Press_Detail.aspx?Item_ID=28268

- Tomorrow, I invite you to join the County Executive for a roundtable to discuss the Draft Plan. The roundtable will take place Tuesday, 6-8pm on Zoom. The Zoom link has been sent to each of you individually, from “Montgomery County, Maryland <no-reply@zoom.us>”, with the subject line “Panelist for Roundtable on the Draft Climate Action Plan with County Executive Elrich.” You will also receive a reminder email with link to the Zoom event one hour prior to event start. If you are having trouble locating your Zoom link please contact climate@montgomerycountymd.gov and we’ll re-send you the link. Members of the public will also be able to watch the roundtable live and ask questions. The roundtable will be broadcast live on the County cable channel.

If you can help spread the word about the Plan, please take a look at the social media kit at MontgomeryCountyMD.gov/climate

Sincerely,
Adriana

Adriana Hochberg, [CC-P](#)
Assistant Chief Administrative Officer &
Climate Change Coordinator
Office of the County Executive



Learn about the County’s efforts to combat the climate emergency:
montgomerycountymd.gov/climate

For COVID-19 Information and resources, visit:
www.montgomerycountymd.gov/COVID19