

CAP 30-Day Public Comment Period Email and Mail from Organizations

Attachment #3: Public Comments-Organizations- Email and Mail

CAP 30-Day Public Comment Period-Email and Mail from Organizations

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REVISIONS:

1.24.2022 - Table of Contents was updated and additional Prince George's County Sierra Club Zero Waste Team comments were added to the end of the document. These comments were received by December 1st but were unintentionally omitted.

Subject: AWS comment letter on Climate Action Plan
From: Chris Williams <cwilliams@anacostiaws.org>
To: climateaction@co.pg.md.us
Date Sent: Wednesday, December 1, 2021 10:58:19 AM GMT-05:00
Date Received: Wednesday, December 1, 2021 10:58:42 AM GMT-05:00
Attachments: AWS Comments on PG County Climate Plan.docx

Please find attached our comment letter on the Prince George's County Climate Action Plan.

Thank you,
Chris Williams

--

Christopher E. Williams
President and CEO
301-699-6204, ext. 105
www.anacostiaws.org



ANACOSTIA WATERSHED SOCIETY

December 1, 2021

Christopher E.
Williams
President/CEO

Mary Abe, Section Head
Natural Resources Protection and Stewardship Programs
Prince George’s County Department of the Environment
1801 McCormick Drive, Suite 500
Largo, MD 20774

BOARD OF DIRECTORS

Neil Lang
Chair

Re: Comments on Prince George’s County Climate Action Plan

Dear Ms. Abe:

Kathryn Petrillo-
Smith
Treasurer

On behalf of the thousands of members, volunteers and supporters of the Anacostia Watershed Society (AWS), I am writing to comment on the Prince George’s County Climate Action Plan. Founded in 1989, AWS is dedicated to the conservation and restoration of the Anacostia River and its watershed. We do this by promoting and implementing field restoration projects, ensuring strong laws and policies are in place to protect water quality and promote restoration, and field- and classroom-based education programs for adults and students in partnership with DC and Maryland schools. As a conservation group committed to the health of the Anacostia watershed, and as an organization headquartered and operating largely in Prince George’s County, AWS applauds the County government for its commitment to acting on climate change with an ambitious integrated plan.

Lars Hanslin
Secretary

Donna An

Elisha Dunn-
Georgiou

Jayant Kairam

Kathleen Linehan

Cynthia Quarterman

Geoff Rankin

Matthew Ries

Nigel Stephens

Michael Tilchin

Ken Williams

*Founder and
Honorary Member*
Robert E. Boone

The 176 square mile Anacostia watershed, home to over 1 million people in Prince George’s County, Montgomery County, and the District of Columbia, stretches from Olney in its northwest corner to Capitol Heights in the southeast. The primary tributaries of the Anacostia, the Northwest and Northeast Branches, Paint Branch, Sligo Creek, and Beaverdam and Lower Beaverdam Creeks, rise in Maryland and form the mainstem of the river in Bladensburg before it flows into the District of Columbia and on to the Potomac. The watershed provides streamside amenities and recreational opportunities to tens of thousands of Marylanders every year. The park systems in lower Prince George’s and Montgomery counties are largely built around the streams of the Anacostia watershed. The Anacostia watershed is no less vulnerable than any river system to the effects of climate change, and the tremendous progress made over the last 20 years to improve water quality, restore habitat, and control flooding in the watershed is jeopardized by rising temperatures and increased frequency of severe rainfall events. The resulting stormwater run-off erodes streambanks, increases sediment loads and washes pollution and trash downstream and into the mainstem.

The Climate Plan promotes many of the right elements of climate mitigation and adaptation including improving alignment of land use regulations to integrate smart growth, natural resource conservation and green infrastructure strategies; pushing the



county towards renewable energy and energy conservation; planning aimed at taking cars off the roads; preserving and expanding the county's tree canopy; and implementing climate resilient stormwater and flood management. But, however well thought out and drafted (and the Climate Plan is both), a plan is only as good as the political will and determination to see it and its component parts implemented. On this score, past performance is not entirely encouraging. A couple of examples:

The Climate Plan calls for enactment of "regulation and policy to maintain and expand street tree canopy and forest and land cover"¹ and "preserv[e] and restor[e] natural resource areas and agricultural open space to reduce flood risk" through smart growth and other development controls. However, the Plan itself describes how earlier efforts to do so largely failed. It declares that the rampant "practice of granting waivers, special exceptions, and grandfathering development approvals" that undermines growth controls "must end," but provides little guidance on how this major change in "business as usual" is to occur. Guilford Woods, a 15-acre residual forest adjacent to the University of Maryland campus currently threatened by development, has thus far been saved from the bulldozer not by a protective county but by student action. Yet, if the aspirations of the Plan are to be met, the County will need to be much more willing to energetically enforce its regulations to preserve forests, wetlands, and open space like Guilford Woods, one of the most effective bulwarks against the impacts of climate change. Language in the Climate Plan for just how this sea change is to occur would increase confidence that the Plan will produce results.

Similarly, that Climate Plan calls for "implement[ation of] climate resilient stormwater management and expand[ed] flood mitigation programs." Yet, the County has in the past had difficulty meeting comparatively modest stormwater management goals under its existing MS4 permit, which does not go nearly far enough in addressing climate change. The County's next MS4 permit is now out in draft form and subject to public comment. For the Climate Plan is to have impact, its authors must work to ensure that the final MS4 permit has strong language addressing climate change impacts and how they will be mitigated through regulation, green infrastructure, nature-based solutions, effective monitoring, and robust enforcement.²

AWS is very supportive of the Climate Action Plan, and we greatly appreciate the obvious thought, work, and creativity that have gone into it. We want the implementation of the Plan to be equal to that effort, and that will require an unprecedented, determined, whole-of-government approach. Thank you for the opportunity to comment on the Prince George's County Climate Action Plan.

Sincerely,



Christopher E. Williams
President and CEO

¹ The standard the Climate Plan sets for tree conservation is "No Net Loss." The history of no net loss approaches to natural resources is fraught with examples of "loss" without the corresponding "net." If no net loss is to be the policy, the County must ensure that efforts to mitigate loss result in compensatory quantity *and quality* of tree cover. It must ensure that biologically diverse and robust forested areas are not destroyed and replaced with relatively barren monocultures.

² The recent passage of legislation expanding the county's Rain Check Rebate Program, increasing the lifetime cap per property from \$4,000 to \$6,000, is a positive example of changes to law and policy that support the goals of the Climate Plan.

Subject: Prince George's County Climate Action Plan (CAP) Comments
From: "Rose, Fred" <Fred.Rose@atkinsglobal.com>
To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Cc: "Jones Dove, Arthur" <Arthur.JonesDove@atkinsglobal.com>, "Bourne, Stephen F" <Stephen.Bourne@atkinsglobal.com>
Date Sent: Wednesday, December 1, 2021 4:07:37 PM GMT-05:00
Date Received: Wednesday, December 1, 2021 4:07:45 PM GMT-05:00

Hello,

We are hereby providing you comments regarding the draft CAP as follows:

Overall, the Prince George's County CAP is well conceived, is comprehensive, very well presented, timely and should receive overwhelming public support.

The plan states upfront that the goal is to "reduce" GHG emissions and then much deeper into the document defined the specific goals as reduction of 50% by 2030 and to achieve "carbon neutrality" by 2050. We recommend you state these specific goals more upfront in the plan to avoid any misconceptions. The goals as stated, is consistent with those for other neighboring jurisdictions who have completed a similar planning effort.

We recommend having a definitive and more deliberate "Communications Plan" to engage the community, conduct necessary outreach and education to the public on the impact of climate change and the objectives of the CAP. This will garner essential public understanding, trust and support for the implementation of the plan.

The draft plan does an excellent job at articulating the issues surrounding environmental justice (page 8). We would encourage the county to further ensure the specific actions that clearly demonstrate how this will be addressed be clearly stated and highlighted – include education and healthcare needs in the list of factors to improve. Also, provide a linkage and understanding of how the plan will synchronize with the requirements outlined in Biden's Executive Order - Justice 40 and how they will identify the specific disadvantage or at-risk communities.

We would encourage the county to clearly identify funding sources and apply realistic timing that take into consideration the challenges of the funding/budgetary process which could potentially hamper implementation timeframe for some actions. This is especially applicable to actions identified with a 0- 3 year timeframe. Also, consider and outline the ways in which the current Biden Administration's "Infrastructure Plan" and the "Build Back Better" Bill will be incorporated and used to help the implementation efforts.

We would encourage the county to seek additional assistance in developing key GIS layers to clearly identify disadvantage and at-risk communities based on factors or metrics nationally recognized as best defining these communities.

The county is encouraged to develop a robust tracking system and/or model to evaluate different scenarios that produces different degrees of progress that could also enhance public information, assist with funding prioritization and instill transparency. Other communities across the US and Canada with Atkins assistance, are implementing models and utilizing tools which could serve as examples.

Some impacts like GHG generated by the transportation sector are a regional issue, as such, it would have been appropriate to see an increased effort (beyond the MCOG's role) to coordinate with neighboring jurisdictions, especially those who already have Climate Action Plans – i.e. Montgomery County, Arlington County, Fairfax County and DC (currently in progress).

We appreciate this opportunity to provide comments on this vital endeavor by the county and fully supports the plan's adoption. We are readily available to assist you in whatever capacity you might deemed necessary as we have the capabilities and experience from helping other communities address the issues relating to Climate Change and Resiliency . Please feel free to contact us as needed.

Fred Rose, P.E.

Senior Engineer III North America Engineering, Design & Project Management

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Atkins, member of the SNC-Lavalin Group

1925 Ballenger Ave, Suite 400, Alexandria, VA 22314

At Atkins - member of the SNC-Lavalin Group, we work flexible hours around the world. Although I have sent this email at a time convenient for me, I don't expect you to respond until it works for you.

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Subject: Audubon Naturalist Society (ANS) - Written Comments for Prince George's Draft Climate Action Plan

From: Denisse Guitarra <denisse.guitarra@anshome.org>

To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>, "Crooms, Andrea L" <ACrooms@co.pg.md.us>

Cc: "clerkofthecouncil@co.pg.md.us" <clerkofthecouncil@co.pg.md.us>, "mfranklin1@co.pg.md.us" <mfranklin1@co.pg.md.us>, "At- LargeMemberHawkins@co.pg.md.us" <At-LargeMemberHawkins@co.pg.md.us>, "CouncilDistrict1@co.pg.md.us" <CouncilDistrict1@co.pg.md.us>, "DLTaveras@co.pg.md.us" <DLTaveras@co.pg.md.us>, "dmglaros@co.pg.md.us" <dmglaros@co.pg.md.us>, "District4@co.pg.md.us" <District4@co.pg.md.us>, "councildistrict5@co.pg.md.us" <councildistrict5@co.pg.md.us>, "CouncilDistrict6@co.pg.md.us" <CouncilDistrict6@co.pg.md.us>, "CouncilDistrict7@co.pg.md.us" <CouncilDistrict7@co.pg.md.us>, "Councildistrict8@co.pg.md.us" <Councildistrict8@co.pg.md.us>, "CouncilDistrict9@co.pg.md.us" <CouncilDistrict9@co.pg.md.us>, Eliza Cava <Eliza.Cava@anshome.org>

Date Sent: Monday, November 29, 2021 9:26:33 AM GMT-05:00

Date Received: Monday, November 29, 2021 9:26:49 AM GMT-05:00

Attachments: 2021_11_29_ANS_PGC_CAP_Comments.pdf

Dear Prince George's County Department of the Environment,

Audubon Naturalist Society (ANS) provides the following written comments (attached) on the Prince George's County Draft Climate Action Plan (CAP). Our comments list a series of recommendations based on our history of climate change work in the region, with a focus on equitable, natural solutions as well as sustainable transportation and land use matters. On behalf of ANS and our 28,000 members and supporters, we thank the Prince George's County Department of the Environment for considering our comments and suggestions into the final version of the PGC CAP. Please do not hesitate to contact me if you have any questions.

Sincerely,
Denisse Guitarra

CC: Prince George's County Council

Denisse Guitarra
She/Ella
MD Conservation Advocate Audubon Naturalist Society
240-630-4703

ANS has received a 4-star rating from Charity Navigator for the 3rd consecutive year indicating that we are accountable, transparent and adhere to financial best practices.

In an effort to help contain the spread of Covid-19, ANS's offices are closed to the public. Email is the best way to reach me. For information about our current status please visit anshome.org/covid-19-updates/

November 29, 2021

Written Comments for Prince George's Draft Climate Action Plan¹

Submitted by Denisse Guitarra

Maryland Conservation Advocate, Audubon Naturalist Society (ANS)

Dear Prince George's County Department of the Environment,

For 124 years, Audubon Naturalist Society (ANS) has inspired people in the Washington, DC region to enjoy, learn about and protect nature. We thank the Prince George's County Department of the Environment for the opportunity to provide written comments on the Prince George's County Draft Climate Action Plan (PGC CAP). We provide a list of comments of areas we support and areas we recommend being amended as follows. We have divided our comments into four areas which are: general comments, and priority recommendation areas 1, 2, and 3 (these last three follow the same organizational pattern as the CAP itself).

Our comments are based on our history of climate change work in the region, with a focus on natural solutions as well as sustainable transportation and land use matters. We have previously been contributors to and commentors on the Montgomery County Climate Action Plan², Fairfax County-wide Energy and Climate Action Plan, Resilient Fairfax Plan, and implementation strategies for the Clean Energy DC Act³, and we attended the summer community outreach meetings on the PGC CAP. We hope the PGC CAP Climate Commission will take our comments and recommendations into consideration in the final version of the PGC CAP.

¹ Prince George's Draft Climate Action Plan. Original released Nov 1, 2021 – Revised version released on Nov 10, 2021. Available from: <https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

² ANS's Montgomery County's Climate Action Plan. February 2021. Available from: <http://conservationblog.anshome.org/blog/ans-submits-written-comments-on-montgomery-countys-climate-action-plan/>

³ ANS's DC Clean Energy DC Act. February 2020. Available from: <http://conservationblog.anshome.org/author/ari-eisenstadt/page/2/>

I. **General PGC CAP comments**

Overall, the PGC CAP lays out a strong foundation from which there is room for expansion and improvement. The vision and the actions listed are in many cases unique to Prince George’s County from among the plans we have reviewed region wide. Its first highlight is around its trees and forest protection (action M-11) which recommends achieving “no net loss” of tree/forest protection, if implemented well, would set a strong example for other Maryland counties. Its second highlight is the CAP’s ability to be considered as a “living document” that “should be revisited and updated every 18 months.”⁴ This is a strategically well-suited action item. On the other hand, one of its major weaknesses lies around the outreach and engagement action items of Black, Indigenous, and People of Color (BIPOC) as it remains unclear how these actions would be carried out meaningfully and effectively.

A. **Lack of Implementation and financial responsibility**

We have some significant concerns with the document’s ability to be implemented, financed, and acted upon. The PGC CAP lists numerous recommended actions but does not contain a set of plans for turning those recommendations into actionable policies. Nor does it describe how those policies might then be implemented, enforced, or financed. The final PGC CAP should contain real teeth in the form of proposed concrete legislative language for all actions (not just some actions), identifying financing mechanisms, recommending enforcement strategies, etc. Without this type of actionable planning ahead of time, even an excellent document, does not mitigate or adapt to our very real, very urgent, climate crisis.

B. **Community outreach and engagement shortfalls**

In addition, the PGC CAP Climate Commission did not do enough outreach to BIPOC stakeholders during the PGC CAP’s drafting process. For example, little or no notices were given ahead of community meetings held during the spring/summer 2021. It was also unclear if the participants’ feedback that was given at these meetings was integrated into the CAP as no follow ups were ever distributed after each meeting. Also during the community meetings, on multiple occasions, the zoom Spanish interpretation channel had technical difficulties, so it is unclear if Spanish speakers were able to properly participate in these meetings. The US Census shows Latinx make

⁴ Prince George’s Draft Climate Action Plan. Nov 1, 2021. Revised version released on Nov 10, 2021. Next steps section – page 108. Available from: <https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

up 19.5% and Black /African Americans make up 64.4% of the county's residential population⁵. The CAP states that 41.2% of the population age 5 years of older speaks a language other than English⁶. **It is therefore concerning that in a language and culturally diverse county, the CAP outreach and materials were not made available in multiple languages and formats.**

In a close inspection of the draft CAP⁷ released on Nov 1st and the revised CAP⁸ released on Nov 10th, Action Area 1 changed its name to "Equitable Community Engagement, Education and Outreach" from the original "Operational Actions to Bring About Transformational Change." Any changes made between the first and second PGC CAP should have been clearly stated for transparency and a genuine goal of creating meaningful community engagement opportunities for CAP planning. **Furthermore, if any additional changes were made with in the 30-day open commenting period, then the commenting period should have been extended to allow and give ample time for community members to review the plan.**

Consequently, it is unclear how the county's wider and more diverse stakeholders' unique concerns and vulnerabilities will be incorporated into the final plan, nor how BIPOC community stakeholders will be included in the decision-making and implementation processes. The final PGC CAP should call out those communities and vulnerabilities and specify how they will be incorporated into implementation and decision-making.

II. Priority Recommendations - Action Area 1: Operational Actions to Bring About Transformational Change / Equitable Community Engagement, Education and Outreach.⁹

ANS supports the PGC CAP's intent to increase transparency and capacity within climate action planning (CO-1 & CO-2), ensuring that communities are co-creators of climate action policies (CO-

⁵ US Census. Prince George's County. Accessed on November 19, 2021. Available from:

<https://www.census.gov/quickfacts/princegeorgescountymaryland>

⁶ Prince George's Draft Climate Action Plan. Revised version released on Nov 10, 2021. Demographics -page 17.

Available from: <https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

⁷ Prince George's Draft Climate Action Plan. Original released Nov 1, 2021, 2021. Page XI. Available from:

<https://www.princegeorgescountymd.gov/DocumentCenter/View/38220/PGC-draft-Climate-Action-Plan--2021>

⁸ Prince George's Draft Climate Action Plan. Revised version released on Nov 10, 2021. Page XI. Available from:

<https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

⁹ Prince George's Climate Action Plan. Revised version released on November 10th. Priority Recommendations - Action Area 1: Operational Actions to Bring About Transformational Change / Equitable Community Engagement, Education and Outreach. Pages: 110- 138. Available from:

<https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

3). The communities most impacted by the effects of climate change in the county need to have more decision-making power in the policies that will have a direct impact on their long-term health and wellbeing. We also support and applaud the PGC CAP's commitment to finding a balance between climate actions with sustainable land use development within the county's existing main plan – Plan 2035 (CO-5). In Montgomery County, a number of land-use related climate actions have fallen through the cracks between the new General Plan Thrive 2050 and the Montgomery County CAP. We are pleased that the PGC CAP addresses this issue head-on.

A. Community outreach strategies leave room for improvement

The action steps listed in action CO-3 are a good start but there is room for improvement. The county needs to ensure that the actions listed in the CAP prioritize, diversify, and actively include more BIPOC communities into the climate action plan's policy, actions, and decision-making processes.

Recommendations:

- **Funds must be allocated towards creating meaningful and culturally relevant engagement opportunities for each of these groups and individuals to participate in climate action planning.**
- **Organize relevant, meaningful, and engaging activities (live and in person) to include a wide range of audiences into the CAP's feedback and decision-making processes.**
- **Create multiple mechanisms for community members to provide feedback, apart from formal written or oral testimony formats, such as listening sessions, walks, and one to one conversations.**
- **The plan must also include mechanisms to expand green jobs and green economy options especially for BIPOC.**
- **The plan should direct funds directly to grassroots groups in these communities to ensure that solutions come from, and benefits stay within the most impacted communities.**
- **Diversify the PGC Climate Commission to reflect and represent the wide range of diverse individuals and communities that live and work in Prince George's County.**
- **Prepare short summaries in multiple languages summarizing the draft CAP main highlights.**
- **Continue to do outreach on the CAP by attending community meetings, events, and meeting up with community members where they are at.**
- **Partner up with local grassroots groups and non-profit organizations to help deliver and spread the information, and obtain feedback from the community on the CAP.**
- **Ensure that county staff or partner organizations speak the language of the targeted audiences/public.**

B. Smart from the Start on Renewable Energy Development

We support the actions listed on renewable energy (CO-4) but believe clearer policy guidelines around renewable energy are needed. The PGC CAP should provide more guidance on where local renewable energy generation projects can be sited.

Recommendations:

- **The final PGC CAP should specify a prioritization process for ensuring smart siting of renewable energy in the county, including identifying any needed changes to planning and zoning.**
- **For solar arrays, ANS recommends “smart from the start” solar siting to include putting solar panels in already disturbed lands, landfills, brownfields, parking lots, rooftops, utility corridors, and other low-conflict lands.¹⁰**

III. Priority Recommendations - Action Area 2: Mitigating the Cause of Climate Change by Reducing Greenhouse Gas Emissions¹¹

ANS is pleased to see the actions listed in area 2. Specifically, we support the actions around increasing residential solar projects (M-2), increasing telecommuting policies (M-6), increasing community-based retrofits and weatherization efforts (M-8) as well as community EVs (Electric Vehicles) (M-4), investment in activity centers (M-7), and reducing waste efforts (M-10). **Most importantly, ANS is excited to see that the PGC CAP has a clear action item highlighting the importance of achieving “no net loss” of trees and forests (M-11).**

A. Increase transit alternatives

ANS supports Prince George’s county’s commitment to increase its EV charging capacity and overall transition into electrical systems to cut back on emissions and dependency of fossil fuels. We support action M-7 which will provide much needed investment around transit-oriented activity centers which are a key step towards reducing vehicle miles traveled (VMT) and GHG emissions.

Recommendations:

¹⁰ ANS written comments on Solar Collection Systems in Montgomery County. March 2020. Available from: <http://cleanstreams.anshome.org/wp-content/uploads/2020/03/ANS-Testimony-ZTA-20-01-Solar-Collections-System-Final.pdf>

¹¹ Prince George’s Climate Action Plan. Revised version released on November 10, 2021. Priority Recommendations - Action Area 2: Mitigating the Cause of Climate Change by Reducing Greenhouse Gas Emissions. Pages: 139-182. Available from: <https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

- **Disincentivize people’s car dependency as a solution to reduce GHG emissions from the transportation sector. Transitioning to EVs and electrifying the transportation system, will not help reduce traffic congestion, because EVs still take up space on roads.**
- **Prioritize investing in more transit alternatives (Metro, BRTs, MARC train) and transit-oriented activity centers to cut back VMT and consequently reduce GHG emissions. These key activity centers must also remain affordable and attainable to people of all income levels to reduce displacement.**
- **Include a prohibition to the expansion or building of new roads.**

B. Increase protections for Trees and Forests:

ANS is delighted to support all action steps listed in M-11 around no net loss and net gain of trees/forests. We also support the stricter standards around protection of trees around watersheds and sub watersheds.

Recommendations (for M-11):

- **Add protection of trees near ephemeral streams in the environmental technical manual.**
- **Increase the replanting ratio to 2:1 (currently it’s listed at a 1:1 replanting ratio).**
- **Prioritize forests ecosystems protections for their wide range of ecosystem services like carbon sequestration, habitat for wildlife, reduction of urban heat islands, stormwater management, air, and water purification.**

These tree/forest protection measures, if implemented and enforced, could really add an important natural based solution to the climate crisis and make this action item the strongest action in the PGC CAP, and even stronger than Montgomery County's Climate Action Plan and new general master plan - Thrive 2050.

IV. Priority Recommendations - Action Area 3: Adapting to coming Climate Impacts¹²

ANS is pleased to support the action area 3’s priority recommendation actions A-1 through A-10. The highlight of this section shows a true commitment ensuring climate adaptation benefits are equally distributed across all county residents. In particular, actions A-2 and A-3 which seek to strengthen community-based green-infrastructure and stormwater practices, are a plus.

¹² Prince George’s Climate Action Plan. Revised version released on November 10, 2021. Priority Recommendations - Action Area 3: Adapting to coming Climate Impacts. Pages: 183-225. Available from: <https://www.princegeorgescountymd.gov/DocumentCenter/View/38462/PGC-draft-Climate-Action-Plan-2021-REVISED-111021->

Similarly, the emphasis to focus on and respond on the impact of heat on vulnerable communities (A-7), creation of resilience hubs (A-8), and over all climate programs information dissemination (A-6) are well planned-out actions. Although the action items listed in A-1 through A-3 are a great start to build climate resilience and adaptation around stormwater management, more can be done as Prince George's County is already experiencing the increased frequency and volume of rainstorms due to climate change.

Recommendations:

- **Clearly define how Action Area 3 items will be implemented and financed.**
- **Address how the county will replace and finance already aging stormwater infrastructure.**
- **Direct that any time infrastructure is opened for repairs or reconstructions, it is enhanced to meet or exceed current stormwater management standards, with green infrastructure (i.e. the addition of bioswales, grass swales, and tree boxes, etc.) taking first priority. Nature-based solutions like green infrastructure are a more efficient cost saving climate change adaptation solution.**
- **A-1 and A-2 actions should be bold and take the opportunity commit to exceed the current MS4 permit requirements and that local requirements overall should codify stricter stormwater management requirements than those the state has proposed.**

V. Conclusion

ANS supports and recommends continued protection of our green spaces and emphasizes sustainable, equitable, transit-oriented development that enhances quality of life, lowers upfront costs, and builds resilient communities with infrastructure that mitigates the worst effects of climate change. **In conclusion, ANS seeks that the following top priorities are included as part of the final PGC CAP:**

- **Clearly define policies for all actions listed in the CAP with an attached implementation and financial plan.**
- **Actively diversify and increase meaningful and genuine community engagement and outreach of BIPOC stakeholders and include their voices, ideas, and concerns in the final CAP and overall climate action planning process.**
- **Be smart about renewable siting and opt in for transit focused, sustainable land use planning which reduces GHG emission and cuts down on car use.**
- **Implement a no net loss and a net gain of forest and tree canopy policies from a well-rounded ecological perspective.**
- **Address the county's urgent stormwater needs and plan for future, larger, and more frequent rainstorms, and flooding events.**

We look forward to continuing to contribute to the PGC CAP as it evolves and is implemented. On behalf of ANS and our 28,000 members and supporters, we recommend that the Prince George's County DEP includes our proposed comments and recommendations into the final version of the Prince George's Climate Action Plan.

Sincerely,
Denisse Guitarra
Maryland Conservation Advocate
Audubon Naturalist Society

Subject: Bowie State letter of support for Climate Action Plan

From: Jabari S. Walker <jswalker@bowiestate.edu>

To: Hawkins-Nixon, Dawn <DHNixon@co.pg.md.us>; Abe, Mary <MAbe@co.pg.md.us>; Crooms, Andrea L <ACrooms@co.pg.md.us>

Date Sent: Tuesday, December 14, 2021 11:53 AM GMT-05:00

Good Morning Ladies,

Good news! Please see attached letter of support from Bowie State University for the Prince George's County Climate Action Plan. I will also have the original mailed to you. Please let me know the best mailing address.

Jabari S. Walker, MPA

Sustainability & Energy Coordinator/Insurance Manager
Bowie State University
14000 Jericho Park Road
Bowie, MD 20715
Office phone: (301) 860-4464
Remote cell: (301) 832-4590



DIVISION OF
ADMINISTRATION & FINANCE

Henry Administration Building
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P 301-860-3470
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December 10, 2021

RE: Support for the Prince George's County Climate Action Plan

Dear County Council Member:

The Administration of Bowie State University (BSU) is in full support of the Prince George's County Climate Action Plan. Bowie State University recognizes the need to reduce the worst impacts of climate change. Our institution represents over 6,000 students and employees who live in, attend school and/or work in the County and will benefit from the Climate Action Plan's implementation.

Bowie State University is Maryland's first historically black university and has been a vital part of the County for well over 100 years. BSU supports Maryland's workforce and economy by engaging in strategic partnerships, research, and public service to benefit our local, state, national, and global communities. Entrepreneurship and leadership are two values that we instill in our students and community. Therefore, taking leadership over our environment is critical for all of us and for future generations. Climate leadership is vital to ensuring that all of our communities remain a desirable place to live, work and play. We applaud Prince George's County for taking necessary and immediate steps to protect our county against the effects of climate change on our infrastructure and social, economic, and natural systems.

The University has already supported the County's efforts by recording a preview video during our Earth Week 2021 celebration with the Prince George's County Department of the Environment on the County Climate Action Plan process. The video- which can be accessed on YouTube- includes segments from our students, UMD College Park students, BSU President Aminta H. Breaux and comments from BSU alumni Michelle Russell, Acting Director of the Prince George's County Department of the Environment, and the Honorable Calvin Hawkins (Chair, County Council). Furthermore, we have representation on the Prince George's County Climate Action Commission in our own esteemed faculty member- Dr. Alan Anderson, Associate Professor in our Natural Sciences Department.

Our institution is continuing to take active measures to address the climate crisis, and looks forward to partnering with the County to broaden support for the Plan, coordinate local efforts, and share best practices. A few actions our University has already taken include:

- Developed a Climate Action Plan
- Installed a network of solar panels
- Purchased electric/hybrid vehicles

- Provided representation and support to local, state, and national agencies fighting climate change (Second Nature, Climate Commitment Agreement, White House Act on Climate)
- Signed a multi-year Energy Performance Contract

The future of our communities depends upon aggressive reduction of greenhouse gas emissions at all levels of government. We urge the County Council to swiftly adopt the draft Climate Action Plan and begin implementation of the measures that have been outlined in the 26 Priority Recommendations.

Thank you for recognizing the need to take bold action to address the most urgent issue of our lifetimes. We stand ready to assist in the effort to forge a new path to a climate-friendly future.

Sincerely,



Anthony P. Savia

Vice President for Administration & Finance

Subject: Casey Trees Comments on Prince George's County Climate Action Plan
From: Mark Buscaino <mbuscaino@caseytrees.org>
To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Cc: Mary Abe <MAbe@co.pg.md.us>, Kelly Collins Choi <kcollinschoi@caseytrees.org>, Andrew Schichtel <aschichtel@caseytrees.org>
Date Sent: Monday, November 29, 2021 4:15:05 PM GMT-05:00
Date Received: Monday, November 29, 2021 4:15:19 PM GMT-05:00

To whom it may concern:

Casey Trees applauds Prince George's County Climate Action Plan, and we thank you for the opportunity to provide comment, as follows:

No Net Loss Canopy Goal

Casey Trees applauds the County's goal to maintain and grow its current canopy identified at 52% (page 52). Accomplishing this goal in the face of continual population growth with its resultant intense development pressures will be extremely challenging. However, given the right mix of Tree Preservation via well thought-out laws/ordinances and a robust planting strategy this goal for a large land mass like Prince George's County is achievable.

Focus on Soil for Long Term Success

While maintaining 52% canopy is doable, where it is and where it will be maintained is a different question requiring planning and much forethought. In particular, maintaining a robust tree canopy in the more urbanized areas of the County will be problematic. Clear planning guidelines that preserve soil will be key to long-term success. An example of this would be to ensure that roadway improvements allow for wide street tree strips 6' or greater in width that are continuous – meaning that trees are not planted in "pits" surrounded by concrete on all four sides. Soil is the key element to the preservation and perpetuation of trees, and it must be preserved if the County wishes to attain this ambitious goal.

Tree Preservation and Protection

Tree preservation laws/ordinances in most jurisdictions typically only apply during the development process. Except during soil disturbance and/or the development process, most jurisdictions do not regulate tree removals, which runs contrary to the reality that trees provide benefit not just where they are located, but to the community and County as a whole.

Casey Trees therefore urges the County to adopt a regulatory framework to protect trees on all lands at all times – similar to the Urban Forest Preservation Act and its predecessors, enacted in the District of Columbia in 2002 and again in 2016. Laws such as DC's and others like it do not prevent landowners from removing trees that are dead, dying or hazardous, but they do impose fees for removing healthy, stable trees of a certain size or greater in all cases even if they are located on private property not undergoing development. Laws such as this will be critical if Prince George's County is to achieve its no-net-loss goal simply because of the fact that most canopy in most jurisdictions is located not on public, but rather private, lands.

Use of the fees and fines resulting from tree removals as they occur are gathered in a special fund, separate from any general funds and not useable for any other purpose than planting replacement trees again back on private lands. These types of planting programs funded by tree removal fees are quite popular and have a secondary benefit of allowing the County to focus in areas of need, not just in terms

of canopy deficit, but in areas where most homeowners would not typically think of planting trees given the financial barrier of doing so.

Tree Planting

Robust tree planting efforts form the cornerstone of any successful tree goal establishment and attainment strategy, and these efforts may be bifurcated into two distinct efforts – public and private lands (see page 91). Tree planting on County Lands should follow a plan devised and followed to achieve goals that should be set for them. For example – street tree spaces in all cases should be planted whenever they become available with a species appropriate for the location/constraints, prioritized by those neighborhoods where there is excessive heat build-up and where residents are requesting them, but not excluding those that do not. The County is currently planting approximately 10,000 street trees per year, but with additional funding it could easily expand that.

To ensure green, shaded and cool streets throughout its land base, the County should commit itself to achieve 100% street tree stocking at some point in the future – perhaps 10 – 20 years. This goal is noted on page 89 but no goal for the ultimate planting of these trees has been set. The same planning and goal setting process should be undertaken for all the County’s parks, open spaces, stormwater management ponds and outflows, and any other spaces falling under its jurisdiction that could benefit from additional trees for any number of reasons (soil stabilization, heat island mitigation, etc.)

Tree planting on private lands is more difficult to execute and takes more time because it requires outreach and connection to the landowner where the tree(s) will be planted. However, there are several examples of this work occurring in the region, including in Prince George’s County itself. Expansion of this effort would go a long way toward allowing the County to meet its canopy goals, while creating “buy in” from local residents to care for trees not just on their properties but in parks and other public spaces as well.

Permanent Protection of Lands for Canopy Preservation (page 91)

As noted in the report on page 29, between 1987 and 2021 the County has lost a significant amount of forests, wetlands and agricultural lands to development and related uses. This fact is a good reason to focus on preserving more land in perpetuity to act as environmental buffers for the future. Some low-hanging fruit in this instance is placing under conservation easement those lands that are currently now unbuildable and owned by the County as surplus land. There are many non-profits that hold easements that may act as partners to the County in this endeavor, based on their missions and the cost of conducting this type of work.

Thank you once again for the opportunity to provide comments to this plan.

Regards,

Mark Buscaino | Executive Director | Casey Trees
p: 202.349.1901 m: 202.680.3116
e: mbuscaino@caseytrees.org
w: www.caseytrees.org
a: 3030 12th Street NE | Washington, DC | 20017

Subject: Climate Action Plan

From: Anne Marie Belton <abelton@greenbeltmd.gov>

To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>, "At-LargeMemberHawkins@co.pg.md.us" <At-LargeMemberHawkins@co.pg.md.us>, "CouncilDistrict2@co.pg.md.us" <CouncilDistrict2@co.pg.md.us>, "At-LargeMemberFranklin@co.pg.md.us" <At-LargeMemberFranklin@co.pg.md.us>, "CouncilDistrict1@co.pg.md.us" <CouncilDistrict1@co.pg.md.us>, "CouncilDistrict3@co.pg.md.us" <CouncilDistrict3@co.pg.md.us>, "CouncilDistrict5@co.pg.md.us" <CouncilDistrict5@co.pg.md.us>, "CouncilDistrict6@co.pg.md.us" <CouncilDistrict6@co.pg.md.us>, "CouncilDistrict7@co.pg.md.us" <CouncilDistrict7@co.pg.md.us>, "CouncilDistrict8@co.pg.md.us" <CouncilDistrict8@co.pg.md.us>, "CouncilDistrict9@co.pg.md.us" <CouncilDistrict9@co.pg.md.us>

Cc: Timothy George <tgeorge@greenbeltmd.gov>, Council <Council@greenbeltmd.gov>

Date Sent: Wednesday, December 1, 2021 7:48:59 AM GMT-05:00

Date Received: Wednesday, December 1, 2021 7:49:05 AM GMT-05:00

Good morning.

The Greenbelt City Council feels the County Council should accept the Prince George's County Climate Action Plan and then adopt and implement it. The Greenbelt City Council has further comments which it will send at a later date.

Greenbelt City Council

Subject: CAP Statement - Hyattsville, MD
From: Sean Corcoran <scorcoran@hyattsville.org>
To: climateaction@co.pg.md.us
Date Sent: Friday, December 10, 2021, 10:08 AM GMT-05:00

Good morning. Please see the attached statement on behalf of the Hyattsville City Council regarding Prince George's County's Climate Action Plan.

Thank you.

SEAN CORCORAN
Deputy City Clerk
Department of Communications and Legislative Services
City of Hyattsville

(301) 985-5001
scorcoran@hyattsville.org
www.hyattsville.org
4310 Gallatin Street
Hyattsville, Maryland, 20781, United States

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December 9, 2021

Mary Abe
Prince George's County Department of the Environment
1801 McCormick Drive, Suite 500
Largo, MD 20774

RE: Prince George's County Climate Action Plan

Dear Ms. Abe,

The City of Hyattsville is very appreciative of the opportunity to provide a formal statement regarding the Prince George's County Climate Action Plan. The Hyattsville Environment Committee, City staff, and Council have reviewed the plan and fully support the initiatives and goals set forth in this vital proposition.


The document clearly summarizes the extensive threats to our region due to climate change and the actionable steps proposed in the plan provide critical direction and guidance detailing the ways in which each community can reduce and repel its negative impacts. There are many challenges to be navigated in this endeavor, specifically ensuring that there is no net loss associated with the existing tree canopy while municipalities actively further development to strengthen economic stability; finding balance will be imperative.

As the City has established its position of support for the plan, Hyattsville is also in strong support of updating the Prince George's Environmental Technical Manual and Landscape Manual. Changes to the language of the manuals that coincide with sound, progressive, policies will offer explicit parameters to dictate the procedures and behaviors that will be most beneficial to repairing our environment.

The City greatly endorses the requirement to preserve and restore natural resource areas through changes in land use and zoning and while banning any development in the floodplain is an ecological necessity, it is equally important to exclude the ability to waive that regulation. Additionally, many jurisdictions within the County have conducted mapping of the tree canopy cover, including thermal mapping, which should serve as a foundation for an effective and useful County-wide assessment.

We look forward to being a partner in the undertaking of these ambitious goals to restore and preserve the environment and we are prepared to work together to improve the plan as it progresses. We understand that this is a feat that will not be accomplished without communion and alliance, and we are eager to contribute to this effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'KW', with a stylized flourish extending from the end.

Kevin Ward
Mayor

cc: City Council
Tracey Douglas, City Administrator
Lesley Riddle, Director of the Department of Public Works

Subject: Climate change Action plan

From: Mayor Benitez <mayorbenitez@mountrainiermd.org>

To: Climate Action <climateaction@co.pg.md.us>, City Manager <citymanager@mountrainiermd.org>, City Clerk <cityclerk@mountrainiermd.org>

Date Sent: Wednesday, December 15, 2021 10:00 AM GMT-05:00

On behalf of the City of Mount Rainier I'm submitting the letter of support for the Climate Change Action Plan .

Celina R. Benitez

Mayor

Mount Rainier, MD

(She/Her/Ella) Hablo Español

Latino Advisory Board

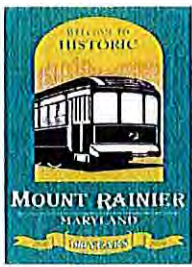
Prince George's County

City of Mount Rainier

1 Municipal Place

Mount Rainier, MD 20712

MayorBenitez@MountRainierMD.org



City of Mount Rainier

One Municipal Place, Mount Rainier, MD 20712

Phone 301-985-6585 Fax 301-985-6595

Incorporated 1910

December 08, 2021

14741 Gov. Oden Bowie Drive
2nd Floor
Upper Marlboro, MD 20772

RE: Support for Prince George's County Climate Action Plan

Dear Chair Hawkins, Vice-Chair Taveras, and Councilmember Franklin,

The City of Mount Rainier is fully supportive of Prince George's County leading on climate action. We urge the County Council to swiftly adopt the draft Climate Action Plan and begin implementation of the measures that have been outlined in the 26 Priority Recommendations.

The climate crisis is existential threat, and Prince George's County must take immediate steps to protect our county against the effects of climate change impacts on our built, social, economic, and natural systems. Recent scientific reports indicate that action must be taken now to have an impact. The future of our communities depends upon aggressive reduction of greenhouse gas emissions at all levels of government, establishing adaptation measures that build community resilience, and implementing equitable climate solutions that protect our most vulnerable populations. The County must prioritize climate-friendly measures and policies, and back up its commitments with adequate funding and staffing. There can be no half-measures when it comes to equitable climate outcomes for all County residents.

The City of Mount Rainier represents over 8,000 County residents who will benefit, and whose children and grandchildren will benefit, from the Climate Action Plan's implementation. Climate protection measures are not only about sustaining our environment, but our economy, our health and our communities as well. Climate leadership is vital to ensuring that all of our communities remain a desirable place to live, work and play.

Our town is already taking active measures to address the climate crisis and looks forward to partnering with the County to broaden support for the Plan, coordinate local efforts, and share best practices. Some actions our community has taken already include:

- Adopting a resolution calling for fossil fuel use to be phased out of municipal operations by;
- Conducting a municipal carbon footprint analysis with assistance from the University of Maryland;
- Purchased an electric vehicle for use by code enforcement staff;
- Replaced city-owned street lights and many indoor lights in city buildings with high efficiency LEDs;
- Installed solar panels on our city hall and conducted events in the community to promote solar energy among residents and businesses;

- Signed a contract to purchase all renewable energy for municipal operations;
- Adopted a green infrastructure plan for the city in order to begin planning for increased resiliency against flooding; and
- Adopted bicycle master plan for the city in order to increase active transportation and decrease single occupancy vehicle use.

However, as much as we have done and continue to do in our community, we need the County to take bold action too. Building codes, transportation networks, smart growth, electric vehicle charging networks, among others will not be successful without this County Climate Action Plan being implemented.

The health, safety, and economic well-being of our community is at risk. Thank you for recognizing the need to take bold action to address the most urgent issue of our lifetimes. We stand ready to assist you as together we forge a new path to a climate-friendly future.

The Mayor and City Council unanimously voted at the Legislative Meeting on December 07, 2021, in support of the letter.

Sincerely,



Celina R. Benitez
Mayor, City of Mount Rainier

City Hall, 1 Municipal Place, Mount Rainier, MD 20712



CITY OF NEW CARROLLTON

6016 PRINCESS GARDEN PARKWAY • NEW CARROLLTON, MARYLAND 20784-2898
Phone (301) 459-6100 Fax (301) 459-8172

November 18, 2021

Prince George's County Department of the Environment
Climate Action Plan
1801 McCormick Drive, Suite 500
Largo, MD 20774
Attention: Ms. Mary Abe

RE: Support for Prince George's County Climate Action Plan

Dear Ms. Abe,

The City of New Carrollton is supportive of Prince George's County leading on climate action. We urge the Prince George's County Council to swiftly adopt the draft Climate Action Plan and begin implementation of the measures that are outlined in the 26 Priority Recommendations.

The climate crisis is existential threat, and Prince George's County Council must take immediate steps to protect our county against the effects of climate change impacts on our built, social, economic, and natural systems. Recent scientific reports indicate that we must take action now to have an impact. The future of our communities depends upon aggressive reduction of greenhouse gas emissions at all levels of government, establishing adaptation measures that build community resilience, and implementing equitable climate solutions that protect our most vulnerable populations. The County must prioritize climate-friendly measures and policies, and back up its commitments with adequate funding and staffing. There can be no half-measures when it comes to equitable climate outcomes for all County residents.

The City of New Carrollton represents over 13,715 County residents who will benefit, and whose children and grandchildren that will benefit, from the Climate Action Plan's implementation. Climate protection measures are not only about sustaining our environment, but our economy, our health and our communities as well. Climate leadership is vital to ensuring that all of our communities remain a desirable place to live, work and play.

Our City is already taking active measures to address the climate crisis, and looks forward to collaborating with the County to broaden support for the Plan, coordinate local efforts, and share best practices. Some actions our community has taken already include:

- Actively increasing tree canopy
- Purchasing electric vehicles
- Outreach and Education to residents
- Participation in Sustainable Maryland
- Passing resolutions in support of energy efficiency and renewable energy
- Forming a Green Team
- Pursing solar panel grants for the City Municipal Center

The health, safety, and well-being of our community is at risk. Thank you for recognizing the need to take bold action to address the most urgent issue of our lifetimes. We stand ready to assist you as together we forge a new path to a climate-friendly future.

Sincerely,



Phelecia E. Nembhard
Mayor
City of New Carrollton

c: Prince George's County Council

Subject: CSG comments on draft Climate Action Plan
From: Bill Pugh <bill@smartergrowth.net>
To: climateaction@co.pg.md.us
Cc: "Abe, Mary" <MAbe@co.pg.md.us>, Cheryl Cort <cheryl@smartergrowth.net>
Date Sent: Wednesday, December 1, 2021 5:29:33 PM GMT-05:00
Date Received: Wednesday, December 1, 2021 5:30:04 PM GMT-05:00
Attachments: CSG comments on PGC Draft Climate Action Plan Dec 1 2021.pdf

Please find our comments on the Prince George's County Draft Climate Action Plan attached. Thank you.

Bill Pugh, AICP CTP | Senior Policy Fellow
Coalition for Smarter Growth
www.smartergrowth.net | @betterDCregion bill@smartergrowth.net
(202) 821-3226



MEMORANDUM

To: Prince George's County Climate Action Commission

From: Bill Pugh and Cheryl Cort, Coalition for Smarter Growth

Cc: Mary Abe, Section Head, Prince George's County Department of the Environment

Date: December 1, 2021

Re: Comments on Draft Climate Action Plan

The Coalition for Smarter Growth submits the following comments on the Prince George's County draft Climate Action Plan released at the start of November:

Draft Plan has several commendable features:

- Acknowledges and explains well the adverse role of sprawling land use patterns, which have hurt the County's climate resilience and efforts to lower greenhouse gas emissions. In particular, it explains how County land use and transportation decisions influence Vehicle Miles Traveled (VMT).
- Shows how climate change is already impacting Prince George's County, how the most socially vulnerable citizens will be most adversely affected, and how certain climate solutions have more co-benefits than others.
- Focuses on actions that can be implemented within five years and provides specific, timebound, measurable, and accountable steps for the actions.
- Seeks to put the County back on track to fulfill the Plan 2035 growth management goals and create innovative mechanisms to preserve green infrastructure and outlying open space areas.
- Calls for developing an "inclusive EV Deployment Strategy" (page 155) that prioritizes other electric modes (transit, bikes, carshare, etc.) and helps lower-income households and those in multi-family housing also benefit from EV adoption.

Further Work and Revisions Needed:

- 1. Strengthen goals and actions for reducing VMT and increasing EV adoption to help meet the County's 50% by 2030 target in accordance with regional and national best practices.** The plan fails to meet the 50% reduction by 2030 overall target in large part because the County does not take sufficient actions to address its largest source of emissions, Transportation.
 - [Rocky Mountain Institute has shown](#) that to adequately reduce climate pollution from transportation, the United States must make sure 25% of cars on the road are electric vehicles (EVs) by 2030 and also cut per capita VMT of light duty vehicles by 20% from 2019 levels.
 - In contrast, the Prince George's climate plan falls short on both accounts: it calls for only 15% of cars in the county to be electric by 2030 and seeks a meager 3.6% reduction in how much families and workers in the County have to drive.
 - The County should use the TPB Climate Change Mitigation Study to inform and set a target in the CAP for per capita VMT reduction, strengthen the EV adoption target, and

incorporate stronger action steps. The TPB study has already [provided important findings to the region](#) that it must do more to reduce VMT as well as adopt EVs.

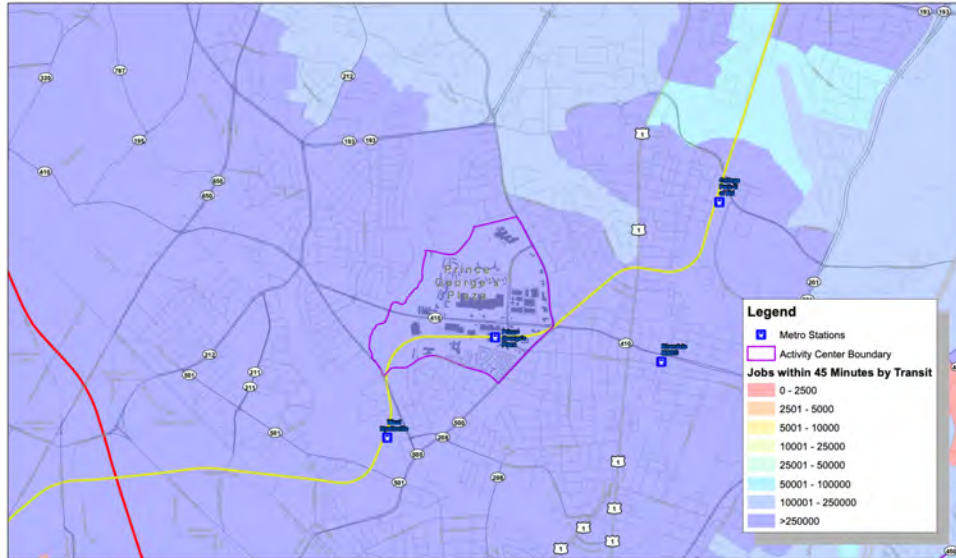
2. Provide implementation steps in Chapter VIII to “Invest in Infrastructure that Increases Transit, Carpooling, and Non-Motorized Travel” (p. 75) and shift funding from planned infrastructure projects that would increase auto-dependence and emissions.

- Page 75 lists several good ideas to improve transit, walking and biking, but the plan provides no steps to implement these on pages 77-78 or in Chapter VIII Priority Recommendations.
- The plan is silent on the billions of dollars planned in highway and roadway expansion in the County, most of which would support development outside the Beltway and far from good transit. CSG analysis using the [RMI SHIFT calculator](#) of induced travel demand from roadway expansion shows that these investments in Prince George’s would induce up to 230 million *additional* miles of driving per year by 2030 and up to 400 million by 2045.
- The County and MDOT should not be spending billions to expand highways and arterials in particular when there is insufficient investment in the County’s existing roads and infrastructure to handle the effects of climate change.
- While the County has adopted Complete and Green Streets and Urban Street Design Standards, and implemented several projects, officials in DPIE and to some extent DPWT, have still resisted implementing bicycle facilities as guided by adopted policies. Further assessment of the potential to systematically implement walk and bicycle improvements should be an action step to ensure walk/bike facilities are achieving greater CO₂ emissions reductions.
- The CAP should provide guidance to the update of the *Countywide Master Plan of Transportation* that is to begin soon. The CAP needs to set targets to reduce VMT and increase non-auto mode share consistent with the findings of the TPB climate change study so that these inform the County’s Transportation plan update.

3. Align the activity center recommendations in M-7 with the Plan 2035 priority centers (Regional Transit Districts, Local Transit Centers) used in CO-5 rather than the COG-designated Activity Centers. Recommendations CO-5 and M-7 include welcome steps to prioritize investment in transit-served activity centers versus outlying areas. However, M-7 uses the COG-defined activity centers, which do not align with the County’s Plan 2035 growth management goals¹ used in CO-5 or with the County’s Economic Development Platform, which focus on transit-oriented development. The COG Activity Centers treat all centers equally regardless of whether they are walkable, have good transit,² and good regional accessibility or not. The maps below and in the Addendum of this memo show why the CAP needs to consistently emphasize the transit-served, accessible activity centers that support the County’s vision.

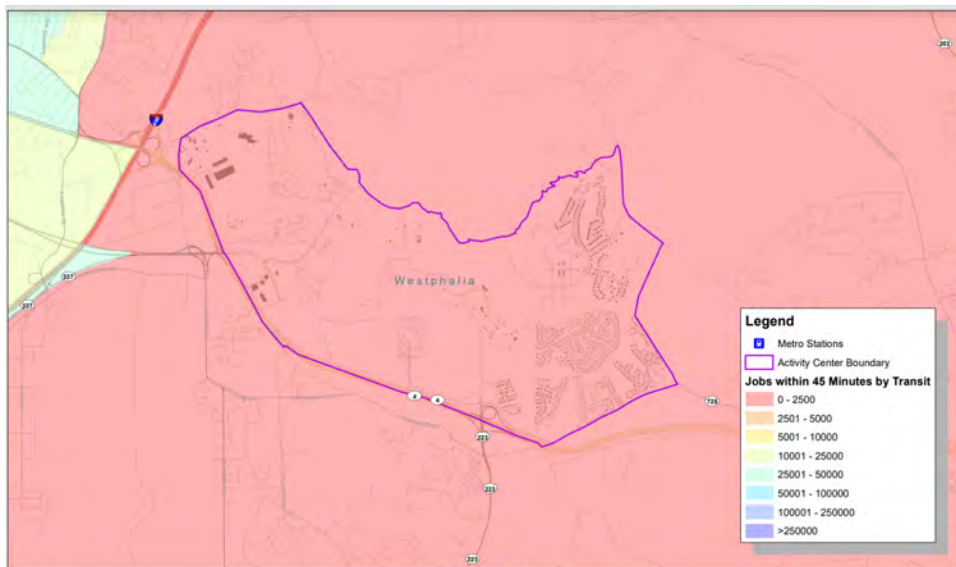
¹ Plan 2035 Land Use Policy 1: “Direct a majority of projected new residential and employment growth to the Regional Transit Districts”

² COG and TPB recently adopted a policy to focus public investment and commercial and residential development in High-Capacity Transit Station Areas.



Jobs Accessible by Transit
Prince George's Plaza

0.6 0.3 0 0.6 Miles
Source: CNT Housing and Transportation Affordability Index



Jobs Accessible by Transit
Westphalia

0.6 0.3 0 0.6 Miles
Source: CNT Housing and Transportation Affordability Index

4. Ensure that VMT is a key component of the proposed “Climate Score” evaluation system. The proposed climate score for land use decisions and Capital Improvement Program investments must evaluate their effects in generating or reducing automobile [Vehicle Miles Traveled \(VMT\)](#) as one of its key measures.
5. Expand transportation demand management and mode shift actions to serve all residents, employers and workers rather than only focusing on County employee teleworking measures.
 - In addition to telework, Priority Recommendation M-6 should be expanded to address other TDM measures and other employment centers throughout the county.
 - Other TDM measures include:

- Expanding employee transit benefits and free/reduced fare programs; and
- Ensuring benefits are provided to employees based on other commute modes (bicycling, walking/housing proximity to work) and/or allow parking cash-out.
- TDM can be implemented relatively quickly and has been shown to provide [significant regional benefits](#) for greenhouse gas emissions and mobility.

6. Advocate for regional cooperation and policies to address the east-west jobs/housing imbalance, including by increasing economic development at underutilized Metro stations.

- The CAP focuses on local action; however, it should still loudly advocate for regional efforts to shift more employment growth to underutilized Metro station areas in the eastern side of the region combined with building more affordable housing near good transit throughout the region. This is Prince George's opportunity to speak up that other localities need to do their part in solving the east-west divide, which drives up greenhouse gas emissions and transportation and housing costs for everyone while dampening economic prosperity.
- The CAP should reference the County's Economic Development Platform as providing the transit-oriented development vision consistent with the CAP.

7. Simplify document organization.

- Organization is somewhat duplicative, with separate chapters for actions and implementation steps, making it confusing for the reader. Perhaps these could be consolidated, or at a minimum these should have clear cross-references and hyperlinks.
- County operational actions in many cases overlapped with other actions. For example, priority actions on land use CO-5 and M-7 have redundancies and some inconsistencies. Suggest consolidating these actions further and/or providing clear cross-referencing.
- Plan needs an executive summary or stand-alone summary document.

8. Improve Public Outreach for Rest of Plan. The virtual public meetings with break-out groups have functioned well and the County provided many sessions in November for the public to learn about and provide input on the draft plan. However, improvements to the remainder of the process and implementation should be made going forward. Areas that can be improved:

- People who participated in community meetings were either not notified of the draft plan release or received an email 8 days into the public comment period.
- County maintained four parallel websites with inconsistent content. Various County notices directed the public to one of four websites for information on the plan:
 - <https://pgccouncil.us/810/Climate-Action-Commission>
 - <https://www.princegeorgescountymd.gov/3748/Climate-Change>
 - [Prince George's CAP Virtual Open House | art.spaces | KUNSTMATRIX](#)
 - <https://climatepartners.org/initiatives/local/prince-georges-county/>
- Video feeds of Climate Action Commission meetings were blurry, and viewers were unable to read presentation materials.

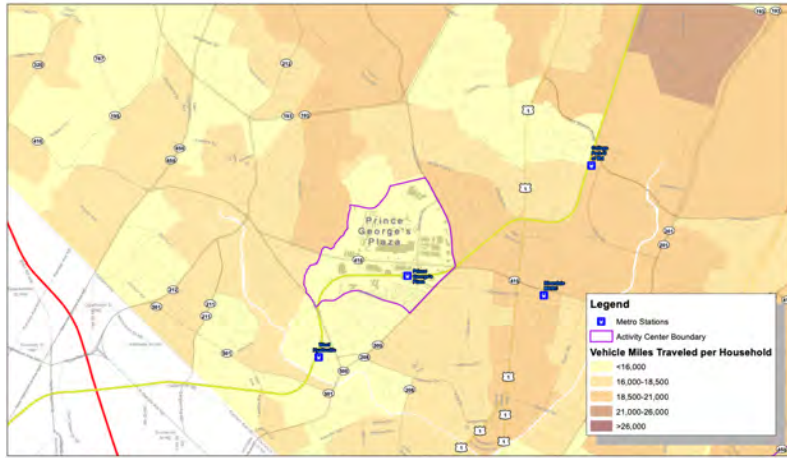
9. Other Comments:

- A. Plan needs a technical appendix to detail assumptions in 2030 scenario wedge analysis.
- B. Emissions baselines and reduction targets on pages 21 and 25 give different numbers.



- C. Define up front for reader what the terms resilient/resilience/resiliency mean in this document. Use of this term sometimes refers to disaster response and recovery, sometimes to climate change adaptation, and sometimes to greenhouse gas mitigation.
- D. “Co-Benefits” concept needs to be explained in the beginning.
- E. GHG Reduction needs to be included as a “Co-Benefit” in the table on page 133, consistent with other actions.

Addendum: Activity Center Comparison: Prince George's Plaza and Westphalia



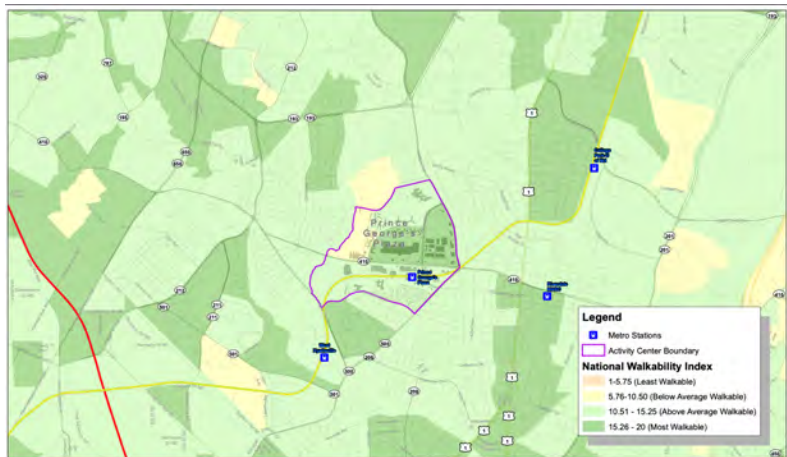
VMT per Household
Prince George's Plaza

0.6 0.3 0 0.6 Miles
Source: CNT Housing and Transportation Affordability Index



VMT per Household
Westphalia

0.6 0.3 0 0.6 Miles
Source: CNT Housing and Transportation Affordability Index



Walkability Index
Prince George's Plaza

0.6 0.3 0 0.6 Miles
Source: US EPA National Walkability Index



Walkability Index
Westphalia

0.6 0.3 0 0.6 Miles
Source: US EPA National Walkability Index

Subject: Friends of Oxon Hill strongly support the Climate Action Plan.
From: Bonnie Bick <bonniebick@gmail.com>
To: climateaction@co.pg.md.us
Date Sent: Wednesday, December 1, 2021 1:35:52 PM GMT-05:00
Date Received: Wednesday, December 1, 2021 1:36:11 PM GMT-05:00

My name is Bonnie Bick, Oxon Hill, Maryland.

Please place these comments on the Prince George's Climate Action Plan record for the Friends of Oxon Hill

We strongly support the Climate Action Plan.

We encourage Prince George's County decision-makers to adopt and implement this plan.

We feel that the county's obligation to protect citizens' health and safety, the value of their property, and the citizen's quality of life is included when addressing the issues in this plan.

Climate change, due to the government's previous failure to recognize its impacts, make it all the more important, but also more difficult to address these issues now, but there should be no further delay.

Public Education:

Before and during the implementation of this plan, there should be more intensive outreach with simplified documents to walk the layperson through the importance of the climate action plan to them personally and communally.

The success of the plan is best when linked to general awareness in Prince Georges's population.

Prince George's County should develop outreach material with the positive responses that will occur in local communities when the plan is in action. It is good for the communities to understand the reasons these plans are being implemented and that they are involved in the implementation as families.

Trust:

In order to successfully involve Prince George's people, they must believe in their elected leadership and trust that their representatives are not being clouded by lack of awareness or personal self-interest, but that their elected officials are standing up and strongly in favor of addressing climate change on the local level here in Prince George's County for the well being of the present and future citizens.

Bonnie Bick
7601 Oxon Hill Road
Oxon Hill, MD 20745
301 752 9612

Subject: MBIA Feedback
From: Griffin Benton <gbenton@marylandbuilders.org>
To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Date Sent: Tuesday, December 7, 2021 2:52:51 PM GMT-05:00
Date Received: Tuesday, December 7, 2021 2:53:06 PM GMT-05:00

Good Afternoon,

I was reaching out to see if it would be possible to submit some additional comments on the Climate Action Plan draft. I apologize for the late request, we had some additional feedback from expert stakeholders and would really appreciate the commission including having this feedback. The plan is very well done, and we commend the work of the work of the committee in drafting this plan.

Thank you,
Griffin Benton

Griffin Benton
Vice President of Government Affairs gbenton@marylandbuilders.org Maryland Building Industry Association 11825 W. Market Place
Fulton, MD 20759
Dir: 301-776-6207
Ph: 202-815-4239

Check out NAHB's Member Advantage Program at www.nahb.org/ma

December 14, 2021

Department of the Environment
1801 McCormick Drive, Suite 500
Largo, MD 20774

Attn: Mary Abe

Re: MBIA Comments – Prince Georges County Climate Action Plan

We would first like to thank the Climate Action Team and the Department of the Environment for their outstanding effort and dedication in drafting this plan and we appreciate the opportunity to provide feedback on the county's Climate Action Plan, and look forward to working with the county and other stakeholders in aiding the county in reaching its climate goals. However, it was unfortunate that the Building Industry was not apart the drafting of this plan as a resource given a large portion of the plan focuses directly residential infrastructure. The timeline for which these 26 priority recommendations taking is over the next 3-5 years. This seems quite aspirational given the uncertainty in regards to the continued effects from COIVD-19, which could subsequently result in unintended consequences for stakeholders because they are being asked to evaluate broad strokes proposals without any clarity regarding what on the ground implementation of the program could/would entail or result in.

Another point that the industry and other stakeholders have asked for further explanation on is regarding the counties role in the financing of certain recommendations. Does or has the county created plans to incentivize versus mandating these proposals through tax credits, reimbursements etc. There must be a partnership between the public and private sector to achieve these goals.

Comments/Feedback:

- Phasing out of all coal plants and cheaper energy sources to produce electricity – cost of alternative measures, geo – thermal and other practices are not commonly used and prices are high
- Increasing tree canopy requirements for carbon sequestration – with increase, with their be offsetting benefits – more density, tax exemptions
 - We do not support a removal of grandfathering. Approvals take several years or more to obtain and are based on laws in pace at the time of approval. Removing grandfathering would result in divestment on the county of development could be subject to future regulators
- Line – “In 1987, 67,000 acres and in 2012, less than 32,00 acres – this is due to smart growth and development over a 25 year period and exponential resident growth
- Critical to incentivize protection and monetize the benefits
- Implement land use plans that limit such development in regards to suburban sprawl

- Already have increased forest conservation requirements, restrictions on septic development, areas planned vs. not planned to for water and sewer, zoning, etc. Need to acknowledge all the laws already in place
 - No Net Loss Tree Conservation Program –
 - Specific recommendation with regards to a net zero regulation. Must be based on the actual problem based on projected forest loss estimated using existing GIS info and projected development pattern based on County codes and ordinances. Mitigation requirements must be kept simple to reduce uncertainty. The afforestation provision must either be removed if a 1:1 replacement requirement is initiated which would require a change to state regs or afforestation needs to be balanced based on the conservation threshold and mitigation ratios. Credit should be awarded for quality improvements in addition to quantity. No net loss should take into account existing quality of forest being saved and credit should be given if quality is improved. Quality improvements should be allowed via an optional method with quantity being the standard method
 - CO-5 pages 133-137 (65% of all new housing in activity center near transit vs. 25% now, no more grandfathering, climate scores for each new development, new developments must be in compliance with climate action plan, shorter validity periods for suburban development projects, severely limit water and sewer category changes for S5, W5)
 - M-11 pages 178-182- (Example issues, No net loss based on gross tract area, requirement to inventory every tree 4"-12" or greater. Removing all exemptions dis-incentivizing redevelopment, removing variance including specimen trees?, preserving forest less than 10,000 SF, requiring min 52% tree canopy on all sites.)
 - Recommendation M-9 prompts the County to develop building benchmarking requirements and standards across the County for both the public and private sectors
 - Starting 2023 the law will extend to all buildings greater than 25,000 sq feet
 - No county currently has this type of program, currently in NYC, Washington State, St. Louis, Washington DC
 - Potential to loose commercial and larger multifamily development
 - A-5: REQUIRE COMMUNITY-WIDE CLIMATE RESILIENT GREEN INFRASTRUCTURE. Green infrastructure should become the primary storm water management practice for all site development in Prince George's County.
 - SWM practices seem to be low hanging fruit, current thresholds are already extremely restrictive and obtaining waivers in cases is a necessary practice to allow projects to move through
 - Page 194 restrict development in a flood plain with no consideration given to compensatory mitigation
-

Additional comments/questions

- Job creation claims in the plan. Are trades jobs really created or just shifted from the natural gas related trades to electrician/electrical appliance related trades?

- Increasing energy efficiency of building as a prerequisite to electrification does not necessarily address that in residential buildings how they are operated by owners/tenants can have as much of an impact on the success of energy efficiency as how they are designed/built.
- What plans has the county developed for the development, roll-out and introduction of these new code structures?
- Has the county explored the need for developing education programs to ensure builders and contractors are trained properly on the needs and requirements of the code?
- Will ongoing training be supported by the County to ensure that costs are not prohibitive as multiple new codes are put in place over a relatively short period of time?

- Will training programs be designed to ensure that builders and contractors are updated routinely on evolving technology, proper installation requirements and how to integrate them to work properly alongside conventional building practices?
- If the county does not prepare industries across sectors to work together and align programs there may be unintended consequences that hinder program implementation.
- Will there be sufficient supply of equipment and technicians to install it to support concurrent changes in both retrofits and new construction?
- Are utilities being leveraged to manage incentive or rebate programs? If so are they developing materials that educations builders/contractors on the requirements/return on investment for the customer? Will customer education be implemented to reinforce the need/value of the change?
- Have adjustors and banks been involved to develop ways of integrating the required change in to the value of the property to ensure access to upfront financing, transparency and a reasonable return on investment.

MBIA appreciates the opportunity to offer our comments and feedback on the Prince Georges County Climate Plan, we look forward to working the PGDEP, the County Executive and the County Council on crafting a plan that works best for all.

If you have any further questions or comments, please do not hesitate to contact Griffin Benton, gbenton@marylandbuilders.org or 202-815-4239.

Thank you,

Griffin Benton, VP Government Affairs

Subject: Pepco's Comments to the Prince George's County Climate Action Plan
From: "Ellis, William R:(PEPCO)" <wrellis@pepco.com>
To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Cc: "Abe, Mary" <MAbe@co.pg.md.us>, "Hawkins-Nixon, Dawn" <DHNixon@co.pg.md.us>, "Cooper, Donna:(PEPCO)" <dcooper@pepco.com>, "Ruffin, Tony K:(PEPCO)" <aruffin@pepco.com>, "Crooms, Andrea L" <ACrooms@co.pg.md.us>
Date Sent: Wednesday, December 1, 2021 3:33:20 PM GMT-05:00
Date Received: Wednesday, December 1, 2021 3:33:32 PM GMT-05:00
Attachments: 2021. Pepco Comments to PGC CAC Plan 12 1 21 3 30 pm SUBMITTAL COPY.pdf

Thank you for the opportunity to comment.

[cid:image001.png@01D7E6C8.C436C390]

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An Exelon Company

December 1, 2021

VIA ELECTRONIC MAIL
climateaction@co.pg.md.us

Prince George's County Department of the Environment
Climate Action Plan - ATTN: Mary Abe, Section Head, Natural Resource Protection &
Stewardship Programs, Sustainability Division
1801 McCormick Drive
Suite 500
Largo, MD 20774

**RE: Pepco Response Comments on the Prince George's County Climate Action
Commission Plan**

On behalf of Potomac Electric Power Company ("Pepco" or the "Company"), I want to thank you for the opportunity to provide comments on the proposed Prince George's County Climate Action Commission Plan ("Prince George's County CAC plan"). Pepco supports Prince George's County's leadership in addressing climate change with a strategic focus on sustainability, resiliency, and equity. We value the open and constructive approach of the County Executive and Prince George's County Council through the Prince George's County Climate Action Commission's work in soliciting public comments to inform this critical action plan. Pepco looks forward to being an active partner with the County in reducing greenhouse gas ("GHG") emissions and investing in the infrastructure and technology necessary to help withstand the worst impacts of climate change on our system and for all our customers. As the electric utility that serves the majority of Prince George's County, Pepco recognizes that we have a unique role in helping to make this transition to a decarbonized future more equitably, inclusively and affordably, through our platform – the electric grid – which we are making smarter, stronger and cleaner. It is in this spirit that Pepco provides the below comments on the proposed Prince George's County CAC plan, which are organized as follows:

1. Background
2. Introduction
3. Electricity Generation
4. Transportation
5. Commercial and Residential Buildings
6. Carbon Sequestration on Natural and Working Lands
7. Adapting to Coming Climate Impacts
8. Enabling Equity in a Clean Energy Economy
9. Conclusion

1. Background

The 16-member Prince George's County Climate Action Commission ("Prince George's County CAC") was created and tasked in 2020 by Prince George's County Council resolution (CR-07-2020) to develop a Climate Action Plan for the County to prepare for and build resilience to regional climate change impacts and to set and achieve climate stabilization goals. The overarching goal of this Commission has been to provide actionable County strategies to both mitigate climate change through reduced greenhouse gas emissions (GHG) and to help protect the County's communities, including the County's natural resources, from the increasing likelihood of significant climate change impacts. More specifically, the plan will set the County on a path to reduce its carbon emissions by 50% by 2030 (compared with 2005 levels). The goal aligns with the state's projection for 50% emission reduction by 2030 through the implementation of the Maryland 2030 Greenhouse Gas Reduction Plan and the Metropolitan Washington Council of Government's goals for the region. The plan also will guide the County toward wise investments in the infrastructure that will serve the County well. This includes a new economy comprised of renewable energy systems, low-carbon transportation and smart growth communities. Pepco is committed to partnering and coordinating with the County, and other key stakeholders, to address the resiliency of critical energy infrastructure that advances the grid as a "platform," where Pepco is the "connector" to provide programs and opportunities for customers and communities to access and enable climate solutions equitably, inclusively, and affordably.

2. Introduction

Maryland is a national leader in combating climate change and advancing energy efficiency and affordable clean energy solutions. In its 2020 Annual Report, the Maryland Commission on Climate Change recommended that Maryland upgrade the Greenhouse Gas Emissions Act of 2016 and adopt a more ambitious goal of a 50% reduction from 2006 levels by 2030 as opposed to the previously established 40% reduction goal. The state of Maryland has taken significant steps to increase the amount of renewable energy developed and delivered to Maryland's electric customers. Additional actions undertaken include reducing energy consumption, electrifying transportation, and increasing awareness regarding the impact of climate change.

Prince George's County has taken the opportunity, through the important work of the Climate Action Commission, to evaluate and propose solutions on all of these critical actions and in line with the work of the state of Maryland. We look forward to working with others, convened by the County, including subject matter experts and interested stakeholders, to collaborate on recommendations to combat climate change and advance policies to achieve climate actions to advance a clean, carbon-neutral future for Prince George's County and its residents. Pepco is committed to working with the Prince George's County government, including the Prince George's County Office of Sustainability, Prince George's County Department of the Environment and community partners to make the necessary system enhancements to enable this future and deliver on our promise to provide safe, reliable, affordable, and sustainable energy to all customers today and into the future.

Pepco provides the transmission and distribution delivery platform for electric energy to approximately 894,000 customers in Maryland and the District of Columbia. The Pepco service

area in Maryland includes 582,434 residential, commercial, and industrial customers in Prince George's and Montgomery counties. Pepco is committed to "powering a cleaner and brighter future for our customers and communities." The comments provided in this document are in that spirit. Through the Prince George's County CAC plan, Pepco will build on its role as a trusted community partner by providing affordable, sustainable, smart and clean energy solutions and options for all customers, enabling understanding and sharing of best practices and improving reliability and resiliency. Toward this end, Pepco's objectives include:

1. Enhancing the security, reliability, and resiliency of Pepco's electric system.
2. Facilitating the deployment of new energy technologies on the electric grid.
3. Enabling decarbonization efforts in the County, including in transportation and the built environment; and
4. Supporting the County and our customers in meeting their climate change goals and objectives.

At Pepco, we are advancing the ongoing transformation of the energy transmission and delivery system to exceed the expectations of our customers and communities. Historically, our customers expected us to deliver safe, reliable, and affordable power. While that has not changed, our customers expect that we will enable a cleaner energy future, while providing equitable access to new energy services and enabling more resilient and decarbonized choices.

Pepco's Climate Change Commitment – As the largest electric utility in Prince George's County, with significant assets and critical energy infrastructure, and as a major employer, we have a responsibility to address our own greenhouse gas footprint while working to provide customers with safe, reliable, affordable and sustainable energy through innovative and inclusive solutions. Pepco's Climate Change Commitment sets out a plan to reduce our own GHG emissions from operations on a trajectory that meets or exceeds the state's reduction goals and to work to inform and advocate for policies and processes that enable further decarbonization as well as support our customers and the larger community by providing the tools, programs and resources needed to enable the transition to a more equitable and inclusive clean energy future and greater resilience in the face of a changing climate.

Some of the steps we have taken to reduce our own GHG footprint includes installing LED lighting at all of our substations and local service centers. More specifically, we have started and continue to replace our existing lights with LED lights, and we are changing out all of the lights at our major warehouse facility in Forestville, Maryland. To date, we also have completed the conversion to LED lighting in 23 of our substations throughout Pepco's service territory in Prince George's County, Montgomery County and the District of Columbia, and we currently have three additional substation lighting upgrades in progress in Prince George's County for 2021 year-end completion. This initiative alone will reduce our energy consumption by 30% at our buildings. Also, the state has set a goal of 50% of electric power sold in the state be renewable by 2030, and we are accelerating the transition to renewable energy use to exceed the state goal by reaching a 50% target for our own buildings including our Forestville Service Center in Prince George's County by 2025.

We also have taken additional actions, to date, to advance a clean energy future with more product offerings for customers. For example, Pepco's EVSmart Program can accelerate the County's goal of significantly reducing GHG emissions in the transportation sector. This can be achieved by enabling individuals to install charging stations at their homes and by deploying more publicly available charging stations throughout the County, at no additional cost to the County. In addition, Pepco continues to invest in grid modernization to facilitate the integration of increased private and community-solar installations in the County, offer energy efficiency and demand response programs, and integrate more distributed energy resources (DER) like solar and wind. These investments are critical to maintaining operational excellence for the energy grid in the County, while enhancing reliability, security, and resilience.

Pepco also recognizes that the transition to a clean energy future can and must be done in a manner that addresses systemic issues related to environmental injustice and inequity and provides opportunities for all customers to benefit from the new opportunities and technologies that this transition will support. Pepco supports the Prince George's County CAC plan's focus on measuring diversity, equity and inclusivity related outcomes to ensure that low to moderate-income (LMI) residents and environmental justice (EJ) communities both benefit from and are a key focus of this plan. LMI consumers use a higher portion of their income for energy than other consumers, and many LMI communities will be the most impacted by climate change. Unfortunately, by having limited financial means, LMI customers confront barriers in accessing new, clean energy technologies and building resilience for themselves and their families.

The final Prince George's County CAC plan should include policies that prioritize LMI residents and EJ communities by including targeted efforts to increase transportation electrification, energy efficiency, community solar, and energy storage for and in communities that have a higher propensity to be impacted by climate change. Pepco is well-positioned to further such policies and to help ensure that historically under-resourced communities receive direct benefits from new technologies and programs to combat climate change. For example, our existing programs, such as the EVSmart Public Charging Program, can strategically deploy charging stations on County locations to ensure EJ communities' benefit from this transformation, including reducing local air pollutants, while offering affordable transportation options. In addition, our energy efficiency programs will continue to target our most vulnerable customers, helping them save money and helping businesses in identified opportunity zones increase the revenue generated to reinvest in the County as well as creating jobs and enhancing economic opportunities.

Pepco and Exelon's Path to Clean – As part of the Exelon family of companies, Pepco joined Exelon's ongoing commitment to protect the environment and take action to address climate change, when, in 2018, Exelon announced a goal to reduce GHG emissions from its internal operations by 15 percent by 2022. This marked the third in a series of GHG commitments Exelon has undertaken with the first two programs resulting in the avoidance of more than 67.8 million metric tons of GHG emissions – the equivalent of taking 14.5 million vehicles off the road for a year. In 2021, Pepco/Exelon announced a new goal to target a reduction in GHG emissions of at least 50 percent below 2015 levels by 2030, and net zero emissions by 2050. Pepco is on track to meet this GHG reduction target and is doing so by activities such as minimizing losses of sulfur hexafluoride or SF₆ from gas-insulated electrical equipment, investing in vehicle electrification and improving the energy efficiency of our buildings and other facilities.

Pepco and Exelon are committed to advancing transportation electrification to benefit customers and communities by taking major steps to electrify its fleet of vehicles. Exelon's utilities will electrify 30 percent of their vehicle fleet by 2025, increasing to 50 percent by 2030. This transition will be achieved through a combination of fully electric vehicles, vehicles with plug-in idle mitigation units and plug-in hybrids. Electrifying 50 percent of the fleet could reduce annual emissions by 12,000-15,000 metric tons by 2030, potentially avoiding more than 65,000 metric tons cumulatively from 2020-2030. That's the equivalent of the carbon removed by one million trees planted and grown for 10 years.

In 2019, the Exelon Foundation, the company's nonprofit philanthropic organization, also launched the Climate Change Investment Initiative, or 2c2i, to provide \$20 million in direct monetary and in-kind support over 10 years to develop new technologies to mitigate GHG emissions and build resiliency to the impact of climate change within the areas served by Exelon's utility companies, including Pepco.

3. Electricity Generation

The Prince George's County CAC plan establishes that the grid is the foundational platform for the more connected, distributed, and decarbonized future that the County envisions. A strong and modern grid provides value to customers by enabling a broader set of clean energy and climate solutions, while also building resilience in the face of more extreme and frequent weather events. The clean energy actions proposed in the Prince George's County CAC plan also calls for the County to install an additional 4 MW of solar on its properties over the next five years and a 100% Renewable Portfolio Standard (RPS) by 2030. To enable this future, Pepco will continue to design, engineer, and construct a well-planned delivery platform and customer-facing tools to enable additional solar and other distributed energy resources to be connected to the grid, safely, reliably, equitably and inclusively. Pepco has made significant investments in streamlining its interconnection processes for DERs, increasing the transparency of its interconnection approval processes, and preparing for greater amounts of DER deployment.

To integrate the increasing amounts of renewables and local solar, Pepco is investing in tools and communications necessary to connect and optimize clean energy resources. This will help Pepco streamline its interconnection processes for DERs, increasing the transparency of its interconnection approval processes, and preparing for greater amounts of DER deployment. For example, Pepco continues to upgrade and enhance its solar interconnection hosting capacity maps, which helps solar developers more efficiently and cost effectively site solar. At this time, there are nine community solar projects with 11.6 MW of capacity located in the Prince George's County's portion of Pepco's service territory. Approximately 2,500 Maryland Pepco customers have subscribed to these community solar projects and receive monthly Pepco bill credits based upon their subscriptions to the energy output of the projects. Pepco also provides a Digital Solar Toolkit, which offers a solar calculator to help customers understand their solar potential and estimate savings of "going solar" through a personalized evaluation. Also, Pepco provides resources to help customers select qualified solar contractors and offers a Community Solar Portal, which gives subscriber organizations the ability to manage their subscribers.

In addition, in January 2020, Pepco deployed a new system - *Connect The Grid* - to better support customers and contractors in submitting, processing and tracking their solar interconnection projects. The company is committed to enhancing this tool and the overall interconnection process. We will continue to engage our customers, Maryland stakeholders and the broader solar developer community and customers to seek feedback on process improvements. To help facilitate the interconnection of community solar in Maryland, Pepco has implemented processes and systems to enable solar developers to interconnect community solar projects to the electric grid and provide customers with savings from these projects. Pepco also closely monitors our distribution system and capacity limits to effectively manage the growth of renewable energy generation to support a diverse and decarbonized energy mix.

As investments in solar photovoltaic systems increase and evolve, Pepco will need to continue to invest in and add facilities in the County, including feeders and substations, to reliably manage the electric distribution grid. Our continued collaboration with both private sector entities and Prince George's County on system capabilities will be important in increasing installed DERs in the County.

4. Transportation

Pepco supports the Prince George's County CAC plan's goal of accelerating the deployment of electric vehicle ("EV") charging infrastructure in the County by 2026. Electrification of the transportation sector is a key strategy in driving large scale decarbonization efforts. Pepco is well-positioned to support the programs, policies and infrastructure for mass transit electrification and increased electric vehicle use in the County through its EVSmart program, which was approved by the Maryland Public Service Commission ("MD PSC") in 2019. Electrification of private vehicles is another crucial step in reaching the zero GHG emissions goal outlined in the Prince George's County CAC plan.

Under the 2019 MD PSC-issued order (*Case No. 9478, Order No. 88997*), Pepco and the other utilities in Maryland established an EV infrastructure pilot program to offer residential rebates for the installation of residential EV charging stations for single family homes and multi-unit dwellings. The program also supports the construction of utility owned charging stations on state, county, or municipal government-owned properties. These incentives can effectively support the expansion of an EV charging network by addressing concerns associated with "range anxiety," which impacts the transition to EVs. Users and potential users are concerned regarding the availability of charging facilities to support the conversion to EV transportation.

Additionally, these incentives for private vehicle electrification can help consumers overcome cost concerns when making the decision to purchase an electric vehicle. As a general matter, electric utilities have a critical role in building, owning, investing, and maintaining the infrastructure necessary to support the electrification of the transportation sector because utilities are best positioned to manage the impact of EVs to the grid and the associated cost. The role of electric utilities is key in helping to deploy this infrastructure in a way that sustains or improves system efficiency and maintains reliability of the energy grid, while also yielding shared value for all stakeholders. Pepco is well-positioned to support and construct charging infrastructure that addresses the transportation priorities established in the Prince George's County CAC plan.

Pepco supports the Prince George's County CAC plan, and we respectfully recommend including County support for the MD PSC-approved EV public charging pilot program (*Potomac Electric Power Company - Delmarva Power & Light Company - Semi-Annual Progress Report for the period of January 1, 2021 through June 30, 2021., Case No. 9478. (ML 237059)*) and to the County continuing to work in coordination with Pepco to rapidly construct a significant number of the 250 Pepco allocated public charging stations to support increases in EV adoption. Additionally, we encourage Prince George's County leadership to consider passing an EV Ready Building Code to promote EV charging station readiness at newly constructed buildings. Furthermore, as the County considers implementation of its Prince George's County CAC plan, we encourage County leadership to support the utilization of a fleet assessment service to explore the potential and opportunities for electrification of its own fleet of vehicles.

The County's transportation sector is the greatest contributor to GHG emissions in the County. In the Prince George's County CAC plan, there is a recommendation to accelerate deployment of EVs and charging infrastructure by County and other public/private agencies. Pepco fully supports this recommendation, along with encouraging the County to create a fast-tracked permitting process that allows for faster construction of charging stations within the County that does not require a commercial building permit. Many states and counties across the country have adopted this process including California, which has more than 25% of the country's total charging stations.

We believe that this technology has the potential to revolutionize the distribution of energy resources that support transitioning from fossil fuels in the transportation sector. Pepco is well-positioned to assist the County in developing the policies and procedures that support EV incentives and expansion of the public vehicle charging network to include supporting the electrification of Prince George's County's transit bus fleet.

5. Commercial and Residential Buildings

Pepco supports the Prince George's County goals to make buildings in the County more resilient and energy efficient. The EmPOWER Maryland Energy Efficiency Act of 2008 authorized and established the framework that allowed Pepco to offer energy efficiency programs that provide cost-effective, long-term benefits, including reduced energy consumption and costs, smart investments in customer facing tools, job creation, and improvements to the local environment. EmPOWER MD programs are designed to deliver 2% energy savings to customers annually. Pepco currently offers a robust portfolio of energy efficiency programs, including lighting and appliance rebates for homeowners, the Home Performance Program with ENERGY STAR (e.g., home energy assessments and 50% rebates for energy improvements like insulation and air sealing), commercial lighting rebates, and energy efficiency services for industrial facilities. Pepco has successfully engaged public and private sector entities on small- and large-scale energy efficiency projects throughout Prince George's County, including partnering with Prince George's County Public Schools to complete 26 energy efficiency projects, which has delivered more than \$622,000 in incentives over the last three years.

Pepco also has a longstanding partnership with several Prince George's County government agencies including the Office of Central Services, Department of the Environment/Office of

Sustainability Division and others to increase awareness around energy efficiency and sustainability efforts within the County. Our partnerships have created innovative ways for customers to participate in energy efficiency programs, while helping customers save money and combat climate change. For example, one pathway for participating in Prince George's County's Clean Energy Program – which provides assistance to residents to adopt energy efficiency measures in nine designated neighborhoods – is to enroll in Pepco's Home Performance with ENERGY STAR Program in order to leverage a grant from the County. Another example is the Home Performance Program, which is funded from the Pepco and Exelon merger. The program provides funds for homeowners with modest incomes to make improvements that save energy and reduce electric bills. Through Pepco's Energy Savings for Business Program, the company partnered with Prince George's County to complete 98 projects, saving nearly 8.1 million kWh annually. In addition, Prince George's County reduced its own utility expenses by more than \$850,000 per year and secured more than \$2.3 million in Pepco incentives to implement a myriad of projects since 2015.

As part of its current residential energy efficiency program offerings, Pepco offers individual customers Quick Home Energy Check-Ups (“QHEC”). The QHEC Program provides no cost audits and measures to both owners and renters living in all areas of the County. Customers receive a walk-through of their homes by a trained Energy Analyst and that individual educates them about how to make their homes more efficient. To reach deep decarbonization goals, Prince George's County will need to realize significant energy efficiency savings and Pepco looks forward to continuing to work with the County to maximize the benefits of available and future energy efficiency programs through EmPOWER MD.

In addition to energy efficiency, Pepco recognizes that electrifying buildings and changing building codes to enable greater amounts of electrification provides a clear opportunity to meaningfully reduce GHG emissions. Pepco looks forward to working with the County as it develops these new codes and standards. Increasing building electrification will require Pepco to plan for shifts in current system dynamics and peak loads. For example, Pepco is currently operating our Peak Energy Savings Credit Program (PESC), which incentivizes customers to use energy off-peak and provides meaningful engagement tips and reminders to help customers reduce peak load. Pepco also operates our EnergyWise Rewards Program in the County, which utilizes HVAC controllers to cycle customer air conditioners on peak days to reduce demand. This program continues to operate efficiently and is expanding with the addition of customer owned thermostats. We also launched an Automated Residential Technology Pilot Program, which will begin enrollment in 2022 and will combine behavioral, IoTs, and demand response to test customer's responsiveness to reduce load on a broader scale in their homes with additional smart home devices.

We are excited to support efforts to improve building efficiency and further electrification. Energy efficiency translates into cost savings for our customers, enhances the service of the local grid and enables greater amounts of GHG reductions. Pepco is prepared to support the development of the building energy efficiency standards recommended and respectfully request that the County consider policy options that align with, and are complementary of, and not wholly duplicative of,

current EmPOWER MD programs offered by Pepco. Pepco will work with Prince George's County legislators and Code Enforcement to review existing standards and offer analysis and information to support successful policy outcomes, as they evolve over time.

6. Carbon Sequestration on Natural and Working Lands

Accomplishing the GHG goals outlined in the Prince George's County CAC plan requires actions to capture and sequester carbon-dioxide. Pepco supports the County's recommendation in the Prince George's County CAC plan to retain well-managed forest land and maintain the urban tree canopy to both provide for sequestration opportunities, as well as help reduce the urban heat island effect and provide shade for homes and buildings.

As an example of how we support these actions, Pepco, in partnership with the Arbor Day Foundation, provided more than 700 free trees to residential customers through the Arbor Day Foundation's Energy-Saving Trees program in 2021. This climate-friendly and environmentally focused initiative helps customers conserve energy and reduce household energy use through strategic tree planting. As an added benefit, exposure to trees has a relaxing effect on humans, reducing stress and impacting a sense of well-being. Finally, trees help mitigate climate change and its impacts by sequestering carbon dioxide or CO₂ and reducing the urban heat island effect. Since 2012, Pepco has provided more than 9,000 trees for customers to plant in Maryland, providing the opportunity for saving approximately 10 million kWh of energy and sequestering an estimated 280,000 pounds of carbon.

Pepco's Right Tree, Right Place Pilot Tree Planting Program, in partnership with Casey Trees, is another example of how it supports these actions. We have recently partnered with Casey Trees to plant more than 100 trees in the following Prince George's County areas: Hyattsville, Mt. Rainier and Cheverly. The goal of the program is to help reduce energy usage, address stormwater runoff, mitigate urban heat spikes, clean the air, and provide County residents with a greener more sustainable future.

Balancing reliability with the benefits associated with a healthy tree canopy is essential to our commitment of providing safe, reliable, affordable and sustainable energy service to our customers. Pepco performs routine tree and vegetation maintenance in accordance with standards that are outlined in the Code of Maryland Regulations ("COMAR") on regular cycles to limit the vegetation that could potentially impact our infrastructure, causing outages for customers. We rely on specialized arborists and our partnership with the County to manage this work. These efforts will continue to grow in importance as we experience more frequent and severe weather events caused by climate change.

In addition to routine vegetation maintenance, we also perform off-cycle work when corrective maintenance is needed, including assisting property owners with the removal of unsafe trees near power lines. For rights-of-way below high voltage transmission lines, we generally mow and responsibly treat the land every four years to prevent trees and other vegetation from growing into the equipment, while working to protect pollinator plants and species. Depending on the voltage, transmission lines may fall under the guidelines of the Federal Energy Regulatory Commission ("FERC") or the North American Electric Reliability Corporation ("NERC"), which means that

they are subject to strict standards and may be maintained annually. Pepco also helps to preserve and protect wetland areas within our service territory, which provides a positive climate impact and supports climate adaptation. We work closely with government agencies and others to ensure compliance and provide a proactive approach to conservation and protection. We use the latest site assessment and planning techniques to protect habitats when we design, build, and operate new facilities as well as when we execute our daily activities, such as maintaining power lines that fall within wetland environments. Pepco works closely with federal, state, regional, and local agencies to obtain wetland permits and helps to protect and preserve these locations so that they can continue to have an important role in climate mitigation, adaptation, and resilience. The current provisions of the Carbon Sequestration recommendations under the Prince George's County CAC plan do not pose any immediate concerns to Pepco's vegetation management practices and wetland protection efforts. In fact, we believe that our efforts in this area complement the measures proposed within the Prince George's County CAC plan and look forward to continued collaboration in this area.

7. Adapting to Coming Climate Impacts

Pepco has identified the Mid-Atlantic region climate-related risks to be increasing in temperatures, potential storm severity and "worst recorded" storm events, sea-level rise, and transient or permanent flooding. Increased storm or flood damage could increase equipment damage and recovery time across the system. As Pepco prepares for a changing climate and invests in the equipment, technology and infrastructure for a smarter, stronger and cleaner grid that can withstand the impact of climate change, we will continue to support the efforts and recommendations of the Prince George's County CAC plan.

Toward that end, Pepco has engaged in multiple system design and engineering efforts including:

1. Constructing redundant supply into many critical facilities and construction of new substations to balance growing load demands,
2. Reconfiguring supply lines to substations to mitigate single points of failure, and
3. Deploying overhead and underground switching equipment to automatically reconfigure and restore customers in the event of an outage.

Over the past 10 years, energy system upgrades and new innovative technologies have reduced the frequency of electric outages by 68 percent for Pepco customers and communities. Several major projects over the next several years across the Pepco service area will help modernize the local energy grid and continue to enhance overall reliability and resiliency for customers; these projects include:

Steel Pole Installation – Pepco has been replacing wooden transmission poles with stronger steel poles along approximately 5.9 miles of public space and existing Pepco right-of-way along the Central Avenue corridor of Prince George's County. These new steel poles help make the local energy grid stronger and more resilient. Steel poles offer significant improvements in reliability, longevity, and durability when compared to wood poles and require less maintenance over time. This investment in Pepco's infrastructure will ensure that Prince George's County customers benefit from the high-performance service levels to ensure safe, reliable, affordable and

sustainable service for our customers. As we move forward with these types of installation projects within the County, it will also be important for us to continue to coordinate with our communities on the implementation and siting as well as to educate them and receive their feedback to assist us with improving our implementation process.

Battery Storage – As the County seeks to electrify public transit buses, school buses and County fleet vehicles, the Prince George’s County CAC plan also establishes the need for a renewable grid that is supported by battery storage. In 2020, the MD PSC issued an order (*Case No. 9619, Order No. 89240*) approving six energy storage pilot projects proposed by Exelon in Maryland, with one located in Prince George’s County and the other in Montgomery County. Batteries have the potential to defer more costly utility infrastructure improvements and will assist distribution utilities in more readily accommodating additional solar and other distributed energy resources at a lower cost, as well as building a level of resiliency for these charging facilities. We also appreciate and encourage the County to continue its participation in pilot programs such as our Livingston Road Battery Energy Storage System project in Prince George’s County.

Pepco will install a 1 MW/3 MWh Battery Energy Storage System (BESS) in the Oxon Hill area of Prince George’s County that is expected to be operational in late 2022. The BESS at Oxon Hill will help Pepco to defer the construction of a future distribution substation, reduce regional peak electric distribution loads, support grid resiliency, interact with the wholesale electricity market, and support additional renewable distribution energy resources. Pepco continues to work very closely with the local community on the installation and use of the BESS and looks forward to demonstrating the benefits of this important technology in Prince George’s County. In support of the BESS, Pepco also established a Community Advisory Group (“CAG”) in February 2021. The CAG includes 10-15 representatives from the Prince George’s County Council District 8 office and residents from the area where the BESS would be located. The CAG has been meeting monthly since February 2021 to receive project updates and information from Pepco subject matter experts about the safety and construction of the project.

Microgrids – Pepco, together with a grant from the Maryland Energy Administration, is also supporting the development of a low and moderate income residential microgrid community demonstration project in Prince George’s County. The project is referred to as the Fairmount Heights Connected Community Initiative. The project is the result of collaboration among the Housing Initiative Partnership (HIP), a green nonprofit affordable housing developer based in Prince George’s County, Pepco, and Emera Technologies. The project consists of the development of six, all-electric and energy-efficient homes each installed with a front-of-the-meter “BlockEnergy” system comprised of solar PV (6kW) and a battery energy storage system (BESS) (17.7kWh). The community is further supported by a 90kWh central BESS.

Electricity from the system is distributed through the community and to Pepco’s grid. Emera Technologies, the BlockEnergy system and microgrid vendor, will install the system and manage it through Q2 2024. The project is expected to become operational in late 2022 to early 2023. This project will allow Pepco to demonstrate the benefits of a utility-owned direct current (DC) distribution infrastructure to manage distributed energy resources at residential community scale. It is also a unique opportunity to provide affordable housing to first-time homebuyers and equitable

access to sustainable energy, while at the same time helping Fairmount Heights achieve its revitalization and climate change goals.

Pepco also continues to explore investments in public microgrids in targeted areas and applications, as well as additional distributed energy resources and system automation to enhance grid resiliency. Pepco believes that microgrids connected to the utility system can be deployed strategically to support critical infrastructure in the County, including emergency shelters. The incorporation of renewable energy and battery storage in the design of microgrids aligns with the Prince George's County CAC plan goals to reduce the use of fossil fuel generation and corresponding GHG emissions. Pepco's ongoing infrastructure investments should be considered in the County's efforts to address critical infrastructure and resilience concerns.

As the demands of a changing climate require new investments, Pepco will work with the County to align our investments with system upgrades and modernization projects that will help the County meet its established goals. Pepco also will keep the County apprised of investments made to power a cleaner, more reliable and resilient system for the residents of Prince George's County.

8. Enabling Equity in a Clean Energy Economy

Pepco applauds Prince George's County's vision that a carbon free economy must be achieved by creating equitable outcomes and addressing racial and ethnic disparities. We have delivered innovative programs in the County for over a decade, ensuring the benefits and opportunities of building a decarbonized energy delivery system reaches all customers and, in all communities, especially those who are most susceptible to the effects of climate change.

Our Energy Efficiency and Electric Vehicle "(EV)" Public Charging programs have been designed with affordability in mind. Our goal with these programs is to provide efficient and effective programs that maximize benefits at the lowest cost to customers. We continue to strategically deploy our EV Public Charging program in many communities and municipalities throughout the County to ensure that no community is left behind in this transition towards clean transportation. Our Energy Efficiency programs have excelled at creating partnerships such as the one with Catholic Charities, by which, we donate LED light bulbs, ensuring our marketing materials are multi-lingual, as well as targeting opportunity zones to provide local benefits where businesses can use the cost savings to reinvest in the communities they serve.

As you are aware, on November 15, 2021, President Joe Biden signed a historic infrastructure bill (*H.R. 3684*) into law, advancing a key part of his economic agenda. This bill will provide \$973 billion over five years from FY 2022 through FY 2026, including \$550 billion of new federal investments in America's infrastructure for all modes of transportation, water, power and energy, environmental remediation, public lands, broadband and resilience.

We see this funding as a great opportunity to offset the cost of investments needed for the County to reach its clean energy goals as well as allow us to continue to enhance our workforce development efforts throughout our service territory to create a pipeline of talent that reflects the diversity of local communities, while also expanding opportunities and awareness of high-

demand energy careers. Pepco recognizes the importance of our local workforce and its crucial role in maintaining the infrastructure for a brighter, stronger community.

Our programs, along with initiatives included in the Prince George's County CAC Plan, are likely to lead, in varying degrees, to a wide variety of economic and workforce development benefits for Prince George's County residents and businesses. These benefits can be classified as:

1. Local job impacts, both in the short-term (for installing the new technologies) as well as longer term jobs associated with operational requirements and upstream supply chain impacts,
2. Local economic development impacts, such as increased income and wages for local workers and increased tax revenues,
3. Pollution reduction and health impacts and their associated impacts on local worker productivity,
4. Wider technology and supply chain impacts, and
5. Other economic benefits such as those from increased reliability and resiliency of the energy system, enhancement of energy equity, support of disadvantaged businesses, and downward pressure on electricity rates.

Throughout our workforce development programs, participants are exposed to the importance Pepco places on clean energy, sustainability, and climate change. For example, in 2021, as part of a program that is run in partnership with the County, 10 students per year, ages 14-22, from the Prince George's County Summer Youth Enrichment Program, attended a virtual learning session dedicated to our climate goals and how to take action to reduce their global footprint.

Pepco also partners with the Exelon Foundation to support energy and climate change education for teachers and students reaching 150 schools in Prince George's County, Montgomery County, and the District of Columbia. Schools receive year-round tools and resources, including professional development opportunities for teachers and a hands-on classroom curriculum. The program offers student-led energy audits for school buildings, field trips for students and teachers and a grant for supplies.

In terms of community connectivity, Pepco can be a strong partner in helping the County reach its climate goals. This includes robust public engagement activities to ensure that communities are empowered and engaged on issues of climate change. Pepco currently maintains a commitment to community outreach through a wide variety of initiatives that align with the County's equitable community engagement, education and outreach goals in the Prince George's County CAC plan.

As the County seeks to enhance climate communications for the community and solicit public support and collaboration on sustainability efforts, Pepco believes that our existing engagement strategies, partnerships, and education activities can support these efforts. Pepco partners with several nonprofit organizations to offer environmental and STEM learning experiences for children and families in the region, which includes:

- In Sept., Pepco, together with its program administrator, Rock Creek Conservancy, chose 11 local municipalities, recreational authorities and nonprofits to receive nearly

\$125,000 in funds to support open space and resiliency projects in Maryland and in the District of Columbia. This funding is provided throughout the region as part of Pepco's Sustainable Communities Grant Program, which provides funding to support open space preservation, improvements to parks and recreation resources, environmental conservation and innovative community resiliency projects. Two recipients in Prince George's County this year include the City of Hyattsville and Town of Landover Hills:

- The City of Hyattsville received a \$9,975 grant, which will support the planting of 75 trees in the public right-of-way to help restore the city's tree canopy, which is depleted by emerald ash borer.
- The Town of Landover Hills received a \$10,000 grant, which will support the Landover Hills Forest Trail and will be used to improve and provide interpretive signage along a 750-foot trail that provides a key connection between public lands and extend the trail to a nearby road to improve access.

9. Conclusion

Pepco is committed to supporting and investing in a clean energy future built on the foundation of a smarter, stronger, cleaner and affordable grid for our customers and the communities that we are privileged to serve, both equitably and inclusively. Through infrastructure upgrades, enhanced products and services, and new tools and technologies, Pepco will be a partner for progress in combating climate change by helping to increase energy efficiency, electrify transportation and enable local solar and storage, and utility scale renewable generation. Due to our scope and scale, we can both bring the benefits of a clean energy future and build resilience equitably and affordably for all customers. These advancements will also be considerate of ensuring that local and diverse businesses are partners in this evolution as well. Pepco appreciates the opportunity to work with the Prince George's County Climate Action Commission and other interested parties to help shape the Prince George's County CAC plan that thoughtfully considers ever-evolving technological developments in utility operations and reflects the economic realities faced by the utility, our customers and the communities we are privileged to serve. We thank you for your consideration and we are available to share our input and experience.

Sincerely,

Donna M. Cooper

Donna M. Cooper
President, Pepco Region
Pepco, an Exelon Company
cc: mabe@co.pg.md.us

Subject: Technical corrections/clarifications on the Waste Reduction section of the Climate Action Plan (pp. 84-87, 173-174)

From: Martha Ainsworth <martha.ainsworth@mdsierra.org>

To: Abe, Mary <MAbe@co.pg.md.us>

Cc: Janet Gingold <jgingold3@gmail.com>

Date Sent: Wednesday, December 1, 2021 11:33 AM GMT-05:00

Attachments: Factual corrections to the Waste Section of the Climate Action Plan.docx

Dear Ms. Abe,

Congratulations on getting the Climate Action Plan to the finish line!

I'm about to submit substantive comments into the record on the Plan's Waste Reduction recommendations on behalf of the Prince George's Sierra Club's Zero Waste Team, through the comment portal you've set up.

However, there are a few places in need of technical correction or clarification that we wanted to share, in case there's an opportunity to fix them in the final printing of the report. I'm not sure that these would be appropriate or helpful to send as "comments." These are attached and we hope that your team finds them useful. Please don't hesitate to contact me if you have any questions.

Best regards, Martha Ainsworth

Martha Ainsworth

pronouns: she/her/hers

Chair, Maryland Sierra Club Zero Waste Team

Member, National Sierra Club Zero Waste Team

Land Line: 301-262-8389

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martha.ainsworth@mdsierra.org sierraclub.org/maryland/zero-waste

Technical corrections & clarifications to the Waste Section of the Climate Action Plan

Submitted by the Prince George’s County Sierra Club Zero Waste Team, 12/1/2021

Martha Ainsworth, Chair (martha.ainsworth@mdsierra.org)

Page #	Error to be corrected	Why it’s an error	Proposed solution
84	“Further, waste management generates GHG emissions whether the waste breaks down in landfills or is burned in waste-to-energy facilities.”	Most waste in landfills does <u>not</u> break down; anaerobic decomposition of organic waste generates methane. Waste is burned in <u>incinerators</u> , which generate a lot of GHG emissions and air pollutants. Electricity is a byproduct, not the objective of an incinerator.	Replace the sentence with: “Further, <u>anaerobic decomposition of organic waste in landfills and incineration of waste both generate GHG emissions.</u> ”
85	“Recognizing the importance of reducing waste, Prince George’s County developed a Zero Waste Initiative.” AND “The County’s Zero Waste Initiative outlines the actions to help drive the county....”	The report is called “Zero Waste Initiatives” and is a menu of interventions to reduce waste. It is a resource, not a Zero Waste Plan and not an initiative adopted by the County Council.	Replace the first sentence with: “Recognizing the importance of reducing waste, Prince George’s County <u>commissioned a review of effective Zero Waste Initiatives.</u> ” Edit the second sentence to read: “The County’s Zero Waste <u>Initiatives study</u> outlines... and move this second sentence up to follow the first sentence.
85	“...the County is aligned and currently setting its own zero waste goals.”	We’re unaware of any current work by the DOE or the County Council on setting zero waste goals. CB-87-2012 set a target of 60% recycling rate by 2020, which was met in 2018, but not met in 2019. <u>There is no new proposed recycling target and no overall zero waste goals or plan.</u>	Drop this language
85	“The program is expanding to 3,000 households and plans county-wide deployment by July of 2022.”	This is a clarification. It has already been expanded to 3,000 households in 2021. The countywide expansion is <u>voluntary</u> and only in <u>unincorporated areas</u> . It does not include municipalities.	“The <u>voluntary</u> program expanded to 3,000 households <u>in 2021</u> and county-wide deployment <u>in unincorporated areas</u> is planned by July 2022.”
86	“...the County should also support introducing a Pay-as-You-Throw (PAYT) fee structure, which would incentivize residents to recycle and repurpose waste to reduce the disposal fees they incur.	The sentence doesn’t mention <u>reducing</u> waste, which is the major objective of PAYT. <i>This same issue is missed in the next two sentences:</i> “Residents who recycle and repurpose...” and “Conversely, those who don’t divert or recycle...”	Insert <u>reduce</u> , before “recycle” in each of the three sentences.
86	“...methane, a greenhouse gas twenty-five times more powerful than carbon dioxide.”	Over a 100-year periods, the global warming potential (GWP100) of methane is 28-34 times that of CO2. However, <u>in the shorter run (20 years) the global warming potential is 84-86 times higher than CO2. These are well-known facts, and since this report has a short-run</u>	“...methane, a greenhouse gas <u>84-86</u> times more powerful than carbon dioxide <u>in a 20-year time frame.</u> ”

CAP 30-Day Public Comment Period-Email and Mail from Organizations

		<u>perspective, the 84-86 times figure should be used.</u> ¹	
86	“...a successful, fourteen-month pilot project to collect food scraps...”	Clarification – it was a <u>residential</u> pilot, did not include businesses.	“...to collect <u>residential</u> food scraps.”
86	“...the County plans to expand the program countywide by summer 2022.”	Per comments above, it will be expanded countywide in <u>unincorporated areas</u> (excluding a quarter of the population that lives in municipalities) Also, it is a voluntary program.	“...the County plans to expand the <u>voluntary</u> program to <u>unincorporated areas</u> countywide by summer 2022.”
87	“Additional steps include the legislative adoption of the County’s Zero Waste Implementation Plan.”	This is factually incorrect. <u>There is no draft County Zero Waste Implementation Plan under discussion.</u> There is only the Zero Waste Initiatives study from 2018.	Change the language to “Additional steps include the legislative adoption of a <u>County Zero Waste Implementation Plan.</u> ”
173	“Key goals include expanding residential curbside food scrap collection countywide no later than 2023.”	On pp. 85, 86, and 174 the text says this will be done <u>by 2022.</u>	Replace the date in the sentence – from 2023 to 2022.
173	“Also critical to these efforts will be County support of Maryland State Law (GET NUMBER), which requires mandatory composting for entities producing more than two tons of food scrap per week, starting in 2023.”	<u>Multiple factual errors.</u> The bill was HB264 / SB483. <ul style="list-style-type: none"> • It doesn’t mandate composting per se (must divert by reducing, donating, managing on site, sending it to organics composting, or for agricultural use). • Initially it applies to entities generating two tons of residuals/week, but a year later, in 2024, it applies to entities producing more than one ton of food residuals per week. • It only applies to entities within 30 miles of an organics composting facility that can accept and process. • MDE is enforcing the law, so the County’s support through additional legislation (suggested later in the text) is not necessary. 	Suggested replacement language: <u>“Significantly, a recently enacted statewide bill (HB264) will require that, as of January 1, 2023, entities generating more than two tons of food residuals per week and that are located within 30 miles of an organics composting facility that can accept and process the waste must divert it by reducing, donating, managing it on site, or sending it for composting or agricultural use. In 2024, it applies to entities generating more than a ton of food residuals weekly. This undoubtedly will increase demand for services of the County’s OCF and divert some organic waste from the landfill.”</u>
173	“...establishing re-use centers to accept and repurpose gently-used bulk materials like furniture, appliances, and house de-packaging equipment , as well as conducting...”	We believe that the report means house deconstruction equipment , not depackaging equipment, which would be something for the Organics Composting Facility.	Replace “depackaging” with <u>“deconstruction.”</u>

¹ <https://www.scientificamerican.com/article/how-bad-of-a-greenhouse-gas-is-methane/>; <https://unece.org/challenge>.

Subject: Prince George's Audubon Society supports PG County's Climate Action Plan
From: kvulture@aol.com
To: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Date Sent: Monday, November 29, 2021 1:21:51 PM GMT-05:00
Date Received: Monday, November 29, 2021 1:22:03 PM GMT-05:00

Dear County Executive Alsobrooks and members of Prince George's County Council:

Prince George's Audubon Society strongly supports the adoption and implementation of the Prince George's County Climate Action Plan. Two-thirds of North American birds are at risk of extinction from global temperature rise, and since birds are an indicator species---if an ecosystem isn't working for birds, sooner or later, the health and well-being of people will also suffer. We believe that by stabilizing carbon emissions we can improve the chances for a majority of birds at risk and provide our children and grandchildren a healthier environment, but we must act quickly.

The Prince George's County Climate Action Plan promotes, and the Prince George's Audubon Society supports, a just transition to clean, renewable energy; increased energy efficiency and reduced waste; smart growth and affordable, reliable, clean transportation options; nature-based solutions to reduce impacts of excess heat and extreme precipitation; and responsible stewardship of our natural resources and agricultural lands.

In keeping with State and Regional goals, the Climate Action Plan sets a goal for the County to reduce its greenhouse gas emissions by 50% from 2005 levels by 2030. It recommends the inclusion of nature-based solutions for carbon sequestration and the enactment and enforcement of No Net Loss tree conservation regulations and policies to expand and maintain tree canopy and forests. In order to maintain tree cover at 52% through 2030 and expand tree cover to 55% by 2050, the Climate Action Plan recommends strengthening tree conservation codes; improving data collection to monitor and map tree cover and ecosystem services; targeting tree stewardship grants for areas with the greatest need; and increasing incentives for residents and businesses to add new trees. We endorse all of these strategies to combat the climate crisis, and as pioneers in the national effort to encourage citizens to give their yards a climate makeover by decreasing lawns, planting native plants, going fertilizer free, and forgoing gas-powered tools, we stand behind the Climate Action Commission's recommendation for public and private engagement in the use of best practices for climate friendly landscaping.

This year Prince George's County Audubon Society implemented a program to advise homeowners about how to garden and landscape for wildlife using native plants. The Society desires to be regarded as a partner in the implementation of Prince George's County Climate Action Plan.

Thank you for the opportunity to support this plan for Prince George's County's future health and prosperity! Please adopt and implement the Prince George's County Climate Action Plan.

Very Truly Yours,
Kenneth A. Cohen, President
Prince George's Audubon Society

Subject: PG DSA Comment on Climate Action Plan
From: PG DSA Steering Committee <steering@pgdsa.org>
To: PG DSA Steering Committee <steering@pgdsa.org>
Cc: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Date Sent: Wednesday, December 1, 2021 10:43:02 AM GMT-05:00
Date Received: Wednesday, December 1, 2021 10:43:11 AM GMT-05:00
Attachments: DSA Comment on Prince George's County Climate Action Plan.pdf

Dear Climate Action Commission:

On behalf of the Prince George's County branch of the Democratic Socialists of America, we are submitting this document as our public comment on the County Climate Action Plan.

Thank you very much for your consideration.

In Solidarity,

PG DSA Steering Committee

PGC DSA Comment on Prince George's County Climate Action Plan



Overview

The Prince George's County branch of the Democratic Socialists of America (DSA) is supportive of the County adopting a Climate Action Plan. In the current climate crisis, sea levels are rising, global temperatures are increasing, and weather-induced disasters are occurring more frequently. Fossil-fuel based energy production and carbon emissions continue to exacerbate these problems, and frontline communities (Black, Indigenous, and low-income) often suffer the worst consequences in the form of environmental injustice.

We applaud the County creating a commission to put together the current version of the Climate Action Plan that is currently available for public comment, and we appreciate the effort made to engage County residents with input in its creation, including the three public sessions in 2021 and the Resident Advisory Group (RAG). We believe that the development of any plan to address the current climate crisis should reflect the ideas and will of the residents, and this does so.

It is imperative that this Climate Action Plan is passed by the County Council and put into place as soon as possible, but as Democratic Socialists, we are cautious about the specifics of implementation. For us, we have to address capitalism as the root cause of the climate and environmental crises we're facing today. Fossil fuels are prioritized for energy generation in the name of profit, and the Earth is exploited for its natural resources, also in the name of profit. All of this contributes to a vicious cycle of growth that leads to overconsumption, waste, and pollution. Therefore, "green capitalism" cannot save us.

We aim to work toward transformative reforms on climate, environment, and power. It is imperative to break capitalist control of contributors to climate and environmental damage; to facilitate a just transition for the workers, the oppressed, and the marginalized; and to achieve liberation from consumerism and waste. This Climate Action Plan provides a lot of basis in achieving these goals, but its success is highly dependent on how the various components are executed. Our detailed comments related to various aspects of the plan are described below

Comments

- It is imperative that the relationship between climate and public health is established, especially for marginalized communities. Health hazards and disparities are a significant effect of climate change, and addressing them equitably throughout the County is an important part of what this Climate Action Plan should be.
- The welfare of future generations should also be a centering and guiding principle of the Climate Action Plan. In recent years, we have seen youth-led climate justice movements throughout the world, from Greta Thunberg in Sweden to the Sunrise Movement here in the United States. More than just a blueprint for meeting metric-based goals in carbon emissions reduction, this Plan should be a basis for an ongoing effort by both municipal officials and residents to build a better Prince George's County that is sustainable in both achieving a better climate and environment for the future.
- The timeline currently is set for the County Council to vote on this plan in January 2022. In the event that it does not pass (and we have good reason to be concerned about its passage based on the recent redistricting), will there be a strategy to put this framework to good use, either by re-introducing it or otherwise generating support? Can we take it to the municipalities in the County to implement parts of it at the local level?
- The Plan is to reduce greenhouse gas (GHG) emissions by 50% by the year 2030 and achieve carbon neutrality (emission elimination, or balancing emission and elimination/sequestration) by 2050. Are these achievable and desired? The plan indicates that a lot of the reduction will come from the state of Maryland accelerating renewable portfolio standard (RPS) requirements. The plan should also empower residents to choose renewable energy options, which would then put pressure on power companies to adapt in response to the needs of the people.
- Protection against extreme weather events in the face of climate change is important, and some of the blueprint plans do address this; with the advent of the recent IPCC reports stating that temperature warming is already happening, climate resilience strategies are at the forefront of planning, and we should continue developing them for implementation within the County.
- Education is emphasized not just at the K-12 level, but also in secondary education and adult education within the plan; case study formats and libraries are a part of it as well. The DSA believes strongly in the power of public schools and public education to serve as centers for individuals to fulfill personal development goals and work towards achieving climate justice.

Comments (cont.)

- Workforce development is mentioned, which is essential for building organized worker power; and connections to local educational institutions like PGCC and UMD extensions also help with easing just transitions for workers. The Labor Network for Sustainability (HQ Takoma Park) would be a great partner on workforce development and a just transition. Organized labor is an essential component in achieving a just transition to a renewable energy economy for the future, and an essential component within a society that has emerging industries in climate-resilient infrastructure and renewable energy generation/storage.
- Adopting a true RPS portfolio is a key to transitioning out of the fossil fuel energy generation dependence to meet the carbon-neutral goals of the plan. It will take political will that can overcome lobbying efforts to keep carbon-emitting energy sources in place. To gain scale, it will be highly useful to coordinate with neighboring jurisdictions, state agencies, and Council of Governments (COG) priorities such as:
 - Climate & Energy
 - Greenhouse Gas Inventories
 - Energy Efficiency
 - Renewable Energy
 - Clean Fuel Vehicles
 - Energy Infrastructure
 - Climate Resilience
- The idea of introducing case studies shows how the people would be more open to renewable transition if programs tied to property and homes (tax credits and grants) would be tied in. It is important for the residents to tie in broader ideas to specific concrete steps that can better their lives.
- We would like to see efforts by the County to ensure that ownership and oversight of any new structures (grid systems, microgrids, new energy-efficient buildings, energy storage/delivery systems, renewable energy sources) are by the residents as stakeholders as well as the County. If a model of investment and development is chosen with private entities, then accountability measures have to be put in place such that private entities don't have an undue amount of influence in decisions related to the energy generation/transmission/distribution/storage and infrastructure put in place as a result of this Climate Action Plan. The Community Solar initiative enabled by state PSC should be utilized whenever possible to ensure neighborhood benefit and solidarity.
- The idea of a framework put in place for addressing vehicle emissions by redesigning work-home commutes and public transit is a big opportunity for re-imagining how the County can operate from the ground up. It can not only impact the environment and climate, but our own schedules and life. Therefore, it is important to consider the holistic effects of how residents' lives can be improved in this process.

Comments (cont.)

- It is important to note that vehicle electrification doesn't just apply to cars; it also applies to bigger vehicles, especially those owned by municipalities for various services (e.g. street sweeping, snow plowing, local public transit). This is a big opportunity for the County to address a huge source of carbon emission, namely, large municipal vehicles.
- The Plan's details on deep retrofits and weatherization of buildings also builds on work towards climate resilience, but we would also want to investigate how these "hard infrastructure" projects can better encompass a transition for better worker power and people power.
- The Plan's carbon sequestration strategy involves tree cover and increasing canopy and amount of trees, but how can we combat rampant private development that is a destructive force to it? This would involve elected officials in the County standing up to outside development projects that have long ravaged our land.
- One of the resilience strategies is heat and temperature mapping across areas to identify high-risk regions. This is dependent on software and data analytics, therefore, how can we make sure that the County can protect this data against the intrusion of Big Tech, and more importantly, not allow corporatization of a strategy meant for the public good?
- Another way of climate resilience is also establishing resilience hubs within the County; would there be any way for making sure that they are not privatized, and also provide for equitable access throughout the socioeconomic variances of the region? We believe that community centers and community schools are templates for building up these hubs throughout the County.

Specifics on Priority Recommendations

CO-1: Build internal capacity to plan and implement climate action

- For a climate leadership summit, will the protocols be in place to get equal representation? Who are the stakeholders that can get a voice, and can they effectively represent County residents?

CO-2: Lead by example and ensure transparency in climate action

- In addition to transparency, a key point is developing ways of informing and elucidating the public without being intentionally confusing.
- Measurements and tracking should be represented in clearly legible and understandable data.
- Tracking data is protected and municipalized, not exploited by Big Tech corporations.

Specifics on Priority Recommendations (cont.)

CO-3: Ensure meaningful, equitable community engagement

- We want to make sure that a long-term strategy is used for training and professional development, and that it's ongoing.
- We want to also make sure that people are continuously engaged in solutions engagement with existing community organizations.
- Also, the Plan should enable, encourage and subsidize internal climate monitoring committees within those broad-scale community organizations.

CO-4: Commit to clean and renewable energy

- A lot of this recommendation is related to financial investment and RPS definition in policy, so it is important to follow through with resolutions and policies that have financial backing
- With the financial backing and investment, there is then the motivation to move to benchmarking, and a more just transition for workers.

CO-5: Strengthen land use regulations to better align individual land-use decisions with state County policies related to smart growth, natural resource conservation, and green infrastructure

- This requires elected and municipal authorities to stand up to rampant development that is destroying the County, and not give any subsidies or tax breaks to corporations that want to exploit the land.
- We also require resident oversight on how land is used, and any process involving land usage has to be as transparent as possible.

M-1: Power County operations with 100% renewable energy

- The energy procurement strategy has to be equitable and not reliant on giving political and influential power to outside companies as an investment strategy; municipal and resident ownership is key.

M-2: Increase deployment of solar PV in the residential and commercial sectors by expanding partnerships, incentives, and financing solutions

- Any task force and education have to be engaged with all residents.
- Engagement with the SolSmart program has to demand accountability in dedication to technical assistance provided to municipalities and residents.

M-3: Accelerate deployment of resilient energy systems

- It is important to limit the power and influence of utility companies like Pepco and BGE to make sure that this critical energy infrastructure is democratized.

M-4: Accelerate deployment of EVs and charging infrastructure by County and other public agencies

- Municipal and democratized control of the entire EV infrastructure is critical for a just transition within a post-fossil fuel vehicle society.

Specifics on Priority Recommendations (cont.)

M-5: Develop a community-wide EV deployment strategy

- We want equity considerations to make it affordable for lower-income residents to get EVs.

M-6: Support telework policies to reduce VMT and enhance County resiliency

- We want more municipal oversight on tech platforms for teleworking (e.g. Zoom, MS Teams), and on the “green” hardware to provide the server infrastructure basis for these platforms.
- This is a critical opportunity to re-think the concept of a workweek and work schedule overall; we do not want this to become a “race to the bottom” for extracting labor out of the County resident workforce.
- Ideas can be created for how roads and highways can be repurposed to better use the land with less VMT.

M-7: Increase investment in Activity Centers

- We want a genesis for building local communities with available facilities for people to access.
- We can use this as an opportunity to rethink how living spaces and areas are used, without poorly thought-out suburban/exurban expansion and development.

M-8: Accelerate implementation of deep energy retrofits and community-wide efficiency and weatherization efforts

- The County itself (in its budget) can put up the money to do it and set the example with municipal buildings to show residents how it could (and should) be done.

M-9: Establish building benchmarking requirements and energy and water consumption standards

- These should apply primarily to present and future municipal buildings.

M-10: Expand County waste reduction and diversion efforts

- Expanding waste programs is key, and providing on-site experts in municipal localities (like sustainability coordinators) can help out residents.

M-11: Enact and enforce “No Net Loss” tree conservation regulation and policy to maintain and expand street tree canopy and forest as a land cover

- The County needs to realize that tree preservation is achieved by standing up to private development in the name of capitalism.

A-1: Require all County agencies and government operations to anticipate impacts from climate hazards and integrate climate resilience goals into all long-range county plans, policies, and CIP programs by 2026

- The County creating a resilience integration office would set an important precedent.

Specifics on Priority Recommendations (cont.)

A-2: Implement climate resilient stormwater management and expand flood mitigation programs

- Sustainable infrastructure development is a large component of dealing with stormwater and flooding issues.

A-3: Prioritize preserving and restoring natural resource areas and agricultural open space to reduce flood risk

- This ties to a lot of political will needed from the County in protecting our lands from private corporate development.

A-4: Evaluate and address climate risk to dams and levees

- Prioritizing upgrades would tie in well with a way of ensuring that the dams and levees are doing the task that they were originally constructed for.

A-5: Require community-wide climate resilient green infrastructure

- Municipal bonds and ordinances have to be executed properly for ensuring that the funds can give rise to the green infrastructure that was promised.

A-6: Expand information and assistance to the public regarding both impacts of climate risks and opportunities to implement climate actions

- Education is a key area, and it has to be more active, not just passive in one-off sessions or lectures.

A-7: Reduce exposure of vulnerable populations to extreme heat

- Thermal mapping should not be data intrusive; it is better for us to have our personal data protected from exploitation.

A-8: Establish resilience hubs to serve the needs of vulnerable communities

- The resilience hubs would ideally be a part of the Activity Centers described in Priority Recommendation M-7.

A-9: Adopt codes, standards, and practices to support climate-ready green buildings and development

- Do created standards have the backing and will to be acted upon? Or will they just exist as a document that no entity adheres to? It is important to execute on the standards that are created, and not allow any flexibility or loopholes.

A-10: Promote a healthy food system supported by low-carbon, regenerative agricultural practices

- An opportunity exists to re-purpose land from power plants that have been environmentally degraded over the years; one way is to rebuild it as gardens and farms based on the principles of agroecology that provide for a sustainable future in food, health, and climate.

Subject: Sierra Club supports the Climate Action Plan **From:** Janet Gingold
<janet.gingold@msierra.org> **To:** climateaction@co.pg.md.us
Date Sent: Monday, November 29, 2021 5:38:49 PM GMT-05:00
Date Received: Monday, November 29, 2021 5:39:05 PM GMT-05:00
Attachments: PGSC supports draft CAP 11-30-2021.pdf

Attached please find a letter of support for the Climate Action Plan from the Prince George's County Sierra Club.



November 30, 2021

To: Prince George's County Department of the Environment
Climate Action Plan - ATTN: Mary Abe

The Prince George's County Sierra Club enthusiastically supports the County's draft Climate Action Plan. We urge county leaders to adopt the plan and implement it, fully and expeditiously.

In this Draft Climate Action Plan, the Commission has laid out a rationale for action, described where we are and where we need to go, and made specific recommendations about how to get started. This is very much a Prince George's County plan, based in our county experience. Insights from past and existing efforts create a foundation for the changes in county operations that will facilitate needed change. The focus on embedding climate mitigation, climate resilience, transparency, and community engagement into county operations will be critical as we accelerate the just transition to renewable energy and adapt to a changing world. With emphasis on health and equity considerations, the plan includes recommendations for how the County can invest first in neighborhoods with the most need. The Plan recommends systemic change for systemic problems, with new systems for collecting and sharing data and information to facilitate transparency, accountability, and public engagement.

Land-use decisions affect both greenhouse gas emissions and resilience. Suburban sprawl development doesn't just replace vegetation with impervious concrete and asphalt, with resulting increases in temperature and flood risk. It also increases the miles we drive and the time we spend in cars. With close to half of county greenhouse gas emissions coming from the transportation sector, it becomes all the more important to design our built environment with both travel needs and climate resilience in mind. The review of recent divergence of land-use decisions from the goals of Plan 2035 (Appendix A) highlights the importance of updating planning documents to take climate impacts into account and aligning land-use decisions with the planning documents, as described in Priority Recommendation CO-5. Accelerating the electrification of our vehicles (M-4 and M-5) is necessary but not sufficient; we must also decrease vehicle miles traveled by focusing development in activity centers and promoting non-automobile modes of transportation as well as telecommuting, as described in M-6 and M-7. The no-net-tree-loss recommendations (M-11) are welcome additions to the county's toolkit for limiting deforestation and providing nature-based solutions to enhance carbon sequestration, water absorption, and evaporative cooling.

For over a decade, the Prince George's County Sierra Club has worked with the County to support public education about waste reduction and waste management. We are

pleased to see that the Climate Action Plan includes recommendations (M-10) for legislation to decrease plastic waste, as well as expeditious completion of the long-awaited county-wide expansion of the County's program for curbside pick-up of food scraps for composting at the Organics Recycling Facility. We are glad to see the inclusion of recommendations about addressing methane emissions from the landfill and attention to the diesel emissions from collection vehicles. The implementation of a Pay-As-You-Throw program will provide motivation to decrease waste. However, community education, outreach, and enforcement will be needed to prevent an increase in illegal dumping.

Improving climate resilience is both a public health issue and an environmental justice issue. The impacts of climate change are likely to exacerbate our existing health disparities, as people in neighborhoods with the fewest trees and the most impervious surfaces are most likely to experience the worst impacts from heat waves and heavy rains. The Climate Action Plan provides recommendations for decreasing exposure of vulnerable populations to excess heat (A-7, A-8)), using nature-based solutions for stormwater management (A-2, A-5) and re-valuing natural resources areas and agricultural open space to reduce flood risk.

Recommendations for climate literacy education, work-force development, professional development, re-training workers displaced during the transition from fossil fuels, and education for residents about climate solutions are keys for unlocking the new economic opportunities for our residents and businesses and empowering all stakeholders to participate in necessary change. Adopting this plan now will facilitate applications for newly-available federal funding to build more resilient electrical grids and increase energy efficiency in buildings, while also stimulating the local economy with new green jobs.

Prince George's County residents need County leadership to establish systems that make it easier for us all to decrease our greenhouse gas emissions and adapt to a changing climate. What we learn as we implement these recommendations will inform new improvements and more resilience for the challenges that lie ahead. We have to do as much as we can as fast as we can to transition to more just and sustainable practices for our future health and prosperity.

The Prince George's County Sierra Club hopes to partner with the County in community engagement activities to help residents and businesses throughout the county decrease their greenhouse gas emissions and increase their resilience in years to come. We urge the County to adopt and implement this Climate Action Plan. Let's get to work.

Sincerely,



Janet Gingold, Chair
Prince George's County Sierra Club
13107 Whiteholm Drive
Upper Marlboro, MD 20774
301-814-1223 – janet.gingold@mdsierra.org

December 1, 2021

RE: Support for Prince George's County Climate Action Plan

Dear County Council Members,

The Environmental Finance Center at the University of Maryland's Sustainable Maryland (SM) program urges the County Council to **swiftly adopt the draft Climate Action Plan** and **begin funding implementation** of the priority recommendations that have been outlined in the plan.

There is strong consensus amongst the scientific community that if we wish to stave off the impacts of climate change, governments at all levels will need to take immediate and aggressive action to reduce greenhouse gas emissions, establish adaptation measures that build community resilience, and implement equitable climate solutions that protect our most vulnerable populations. The climate crisis is an existential threat and Prince George's County must take direct steps to protect against the effects of climate change impacts on its built, social, economic, and natural systems. The County is urged to prioritize climate-friendly measures and policies and back up its commitments with adequate funding and staffing to guarantee equitable climate outcomes for all County residents.

Sustainable Maryland, a free and voluntary outreach and certification program that helps Maryland communities pursue a sustainable future, represents 26 of the County's 27 municipalities. While many of the County's SM municipalities have already started actively taking measures to address the climate crisis (e.g., formally declaring a climate emergency, adopting renewable energy, conducting outreach, etc.), they will need the County's climate leadership, coordination, and support to ensure that their communities remain a desirable place to live, work and play.

The health, safety, and well-being of our communities are at risk. The 229,813 residents represented by SM communities will benefit, and their children and

grandchildren will benefit, from the County’s Climate Action Plan’s implementation. Thank you for recognizing the need to take bold action to address the most urgent issue of our lifetimes. We stand ready to assist you as together we forge a new path to a climate-friendly future.

Sincerely,

Jen Cotting, Director
Mike Hunnginghake, Program Manager, Sustainable Maryland

Prince George’s County Sustainable Maryland Communities

Berwyn Heights	District Heights	Morningside
Bladensburg	Eagle Harbor	Mount Rainier
Bowie	Edmonston	New Carrollton
Brentwood	Fairmount Heights	North Brentwood
Capitol Heights	Forest Heights	Riverdale Park
Cheverly	Greenbelt	Seat Pleasant
College Park	Hyattsville	University Park
Colmar Manor	Landover Hills	Upper Marlboro
Cottage City	Laurel	

Subject: Climate Action Plan Letter

From: Melanie Friesen <mfriesen@berwynheightsmd.gov>

To: "acrooms@co.pg.md.us" acrooms@co.pg.md.us

CC: "climateaction@co.pg.md.us" <climateaction@co.pg.md.us>, Amanda Dewey <adewey@berwynheightsmd.gov>

Date Sent: Thursday, December 9, 2021 9:53 AM GMT-05:00

Good Morning,

Please see the attached Climate Action Plan Letter sent on behalf of the Berwyn Heights Town Council.

Thank you,

Melanie Friesen
Berwyn Heights Town Clerk



Town of Berwyn Heights

5700 Berwyn Road
Berwyn Heights, MD 20740
Tel. (301) 474-5000
Fax (301) 474-5002

MAYOR

Amanda M. Dewey

COUNCIL MEMBERS

Jodie A. Kulpa-Eddy (Mayor Pro Tem)

Christopher S. Brittan Powell

Jason W. Papanikolas

Ethan D. Sweep

Via email:

Director Andrea Crooms, acrooms@co.pg.md.us

General CAP inbox, climateaction@co.pg.md.us

The Town of Berwyn Heights writes to comment on Prince George's County draft Climate Action Plan (CAP). Berwyn Heights recognizes the critical importance of climate action in the County. We encourage the County Council to swiftly adopt the CAP and pursue the actions included.

Berwyn Heights is currently witnessing the impacts of climate change that are negatively affecting our community, including increasing severe weather, flooding, and extreme heat. These threats are expected to increase and disproportionately affect the most marginalized members of our community. Therefore, the County must immediately take action to equitably mitigate and adapt to climate change. The actions outlined in the CAP are important steps forward that represent a transformational opportunity for the County to take the lead in tackling the climate crisis.

On behalf of our residents, we encourage the County Council to adopt the CAP in order to address the greatest challenge of our time for all residents of Prince George's County.

Sincerely,

Berwyn Heights Town Council

Subject: Berwyn Heights Green Team Letter of Support
From: "jbknutson@verizon.net" <jbknutson@verizon.net>
To: climateaction@co.pg.md.us
Date Sent: Wednesday, December 1, 2021 4:17:03 PM GMT-05:00
Date Received: Wednesday, December 1, 2021 4:17:17 PM GMT-05:00

Hello,

Attached is a letter supporting the county's climate action plan from the Berwyn Heights Green Team.

Thank you for your efforts to protect our environment!

Jeff Knutson

RE: Support for Prince George's County Climate Action Plan

Dear County Council Members,

The Berwyn Heights Green Team, the official environmental action group for the town of Berwyn Heights, MD, is fully supportive of Prince George's County leading on climate action. We urge the County Council to adopt the draft Climate Action Plan and begin implementation of the measures that have been outlined in the 26 Priority Recommendations.

Prince George's County must take immediate steps to protect our county against the existential threat of climate change and its impact on our infrastructure and social, economic, and natural systems. It is imperative that we act now to aggressively reduce greenhouse gas emissions at all levels of government, establish adaptation measures to build community resilience, and implement equitable climate solutions to protect our most vulnerable populations. The County must prioritize climate-friendly measures and policies, and back up its commitments with adequate funding and staffing. There can be no half-measures when it comes to equitable climate outcomes for all County residents.

Prince George's County has an opportunity to lead and inspire our neighboring counties and this opportunity should not be wasted. Climate leadership will help ensure that all of our communities remain a desirable place to live, work and play. The Town of Berwyn Heights represents over 3000 County residents who will benefit, and whose children and grandchildren will benefit, from the Climate Action Plan's implementation. Climate protection measures will not only sustain our environment, but our economy, our health and our communities as well.

Our town is a Sustainable Maryland Certified community and is already taking active measures to address the climate crisis. Some actions our community has taken already include:

- Actively defending and increasing our tree canopy
- Installing/Promoting Solar panels at the town offices
- Purchasing renewable energy
- Purchasing electric vehicles
- Presenting outreach and education to residents
- Implementing protections for pollinators

We have no doubt that other communities across the county share our resolve to face the climate crisis. We look forward to working together with the County to lay the foundation for a climate-friendly future. Thank you for recognizing the need to take bold action to address the most urgent issue of our lifetimes.

Sincerely,

Berwyn Heights Green Team
Berwyn Heights, MD
Jeffrey Knutson, Team Facilitator

Subject: Letter from the Town of Riverdale Park: Draft Climate Action Plan
From: Jessica Barnes <jbarnes@riverdaleparkmd.gov>
To: "acrooms@co.pg.md.us" <acrooms@co.pg.md.us>,"climateaction@co.pg.md.us" <climateaction@co.pg.md.us>
Date Sent: Wednesday, December 15, 2021 2:47:54 PM GMT-05:00
Date Received: Wednesday, December 15, 2021 2:48:12 PM GMT-05:00
Attachments: 12.15.2021 Support for Draft Climate Action Plan. FINAL.pdf

Good afternoon,

Attached, please find a letter from the Town of Riverdale Park regarding the draft Climate Action Plan. Have a great day!

Jessica
Jessica E. Barnes Town Clerk
Director of Administrative Services Town of Riverdale Park
5008 Queensbury Road
Riverdale Park, MD 20737
www.riverdaleparkmd.gov
301-927-6381 x505

A Welcoming Community, Come Grow with Us!

DISCLAIMER: All Town of Riverdale Park email recipients are cautioned that messages sent and received via the Town's email system may be considered public record pursuant to the Maryland Public Information Act, and may be subject to inspection and copying by the public.

December 13, 2021

Prince George's County Department of the Environment
Climate Action Plan - ATTN: Mary Abe
1801 McCormick Drive, Suite 500
Largo, MD 20774

RE: Support for Prince George's County Draft Climate Action Plan

Dear Ms. Abe:

The Town of Riverdale Park strongly supports the draft Climate Action Plan prepared by the Climate Action Commission. The Town urges the County Council to adopt the Plan and promptly begin implementation of the measures that have been outlined in the twenty-six (26) Priority Recommendations.

The Town respectfully recommends as part of its overall support of the Plan, that the draft Climate Action Plan be revised to clarify the description of sources of energy to recognize that there is carbon neutral or zero carbon sources that are not necessarily renewable. It was noted that there are certain instances in the draft Climate Action Plan where the terms carbon neutral or zero carbon and renewable energy were used interchangeably, and a clearer delineation would be more precise.

The Town recognizes sustainability as the foundation upon which healthy communities are built and is committed to operations, programs, initiatives, and resources that further establish and nurture a sustainable Town to include climate protection. Climate protection measures are not only about sustaining our environment, but also our economy, our health and wellness, and our communities. Climate leadership is vital to ensuring that all of our communities remain a desirable place to live, work, and play.

The Town also understands the need to approach sustainability from an inclusive and regional perspective, one that requires collaboration with residents, the business and non-profit community, neighboring municipalities, Prince George's County, the State of Maryland, and federal agencies. The Town appreciates the County's leadership in developing a draft Climate Action Plan and looks forward to working with the County to take meaningful action to address climate protection.

Sincerely,

The Town of Riverdale Park



John N. Lestitian, Town Manager

Subject: Prince George's County Climate Action Plan - Public Comment by CEEJH
From: Katharine Morris <katharine.morris@uconn.edu>
To: climateaction@co.pg.md.us
Date Sent: Tuesday, November 30, 2021 7:39:56 PM GMT-05:00
Date Received: Tuesday, November 30, 2021 7:40:43 PM GMT-05:00
Attachments: Climate Action Plan CEEJH Public Comment.pdf

Hello,

Please see the attached Public Comment submitted on behalf of the Center for Community Engagement, Environmental Justice, and Health based in UMD-College Park.

Thank you,

Katharine

Katharine Morris (she/her)
Founder of UCCO
Master of Public Policy '21
BOLD Scholar & Honors Scholar
Cognitive Science & Anthropology '20
LinkedIn: www.linkedin.com/in/katharine-morris

Prince George's County Climate Action Plan

Public Comments on behalf of Dr. Wilson &

the Center for Community Engagement, Environmental Justice and Health (CEEJH)

Please see specific comments on three sections of the CAP below. Thank you!

Section V: CLIMATE HAZARDS AND TRENDS IN PRINCE GEORGE'S COUNTY

- The focus on compound climate events is appreciated. However, in the section on actions, specifically vulnerability assessments (p.47), there is a need for corresponding **focus on Cumulative health impact assessments** as well, a crucial piece of health studies that is often overlooked from health equity documents. This endeavor would require an organized and robust dataset as well as analysis approach to be successful, and that can be achieved by employing Geospatial tools. Health disparities are often a result of not only health but also environmental, climate, sociodemographic, and economic factors. Geospatial or Environmental Justice Screening and Mapping (EJSM) tools such as EPA EJSCREEN, California's CalEnviroScreen or Maryland's own (MD) EJSCREEN tools have the ability to assess the inequitable distribution of climate and health burdens across communities. Including the development of EJSM tools that reflect indicators of local relevance, and integrating them into the action plan is highly recommended. This will ensure that the most disadvantaged communities can be targeted through the plan.
- Health hazards are often exacerbated by technological disasters, such as oil spills or various chemical leaks into the environment. This is particularly true for floods. Locating these sites and integrating them into health hazard considerations should be an added item in the actions section. See "Gaps in Environmental Justice Screening and Mapping Tools and Potential New Indicators" by Ravichandran, Wilson, et al.
- In the same section, developing a systematic compendium of the health outcomes/impacts from each of the climate events mentioned (such as for flooding, health outcomes include drowning and GI issues) would be an invaluable resource in taking preparatory action towards climate health impacts, and gathering necessary resources.
- Some relevant health disparities indicators are suggested to be included that are related to the various extreme climate events discussed in the plan. These indicators may include but should not be limited to-- mortality due to extreme cold; health insurance coverage; flooding-exposure to mold; deaths related to drowning from flooding; Carbon monoxide poisoning; respiratory and cardiovascular hospitalizations; West Nile virus index; % change in mortality associated with a 10°F increase in mean daily temperature by race/ethnicity; Gastrointestinal illnesses; Cancer Risk from Hazardous Air Pollutants (HAPs); Flood fatalities due to indirect causes; Heat stroke prevalence; Frost bites and hypothermia cases; weather-related car accidents; cases of Kidney disorder; "allergenicity" of pollen; excessive mortality due to heat wave.

Section VI: TAKING ACTION: STRATEGIES TO ACHIEVE A LOW-CARBON, RESILIENT PRINCE GEORGE’S COUNTY:

- Only two of the five County Operations have the community health co-benefit.
- Within the Equitable Community Engagement, Education, and Outreach section, there is no reference by name of community based participatory action research which could be a win-win by collaborating with local academic institutions or centers like CEEJH, the Center for Community Engagement, Environmental Justice, and Health.
- Standards/benchmarks for Equity Metrics should be set prior to implementation in order to facilitate equitable implementation rather than the post-implementation review. If this is already the case, then that information is not clearly presented. Equity must be necessary criteria for the project planning and implementation at every stage.
- Further discussion on the efficacy of programs listed on the Spotlight on Solar Programs, as well as methods to increase equity would be useful additions.
- Additional Spotlight on Health sections would be useful, especially in the Waste Management Section and the inclusion of ecological health (plant and animal) into the Adaptation Spotlight is important and relevant. There is a general lack of discussing the existing disparities/inequities in climate/environmental health stressors.

Section VIII: PRIORITY RECOMMENDATIONS

- Action Areas 1 - 3 have too little focus on human health; this section should include health indicators that will be monitored to ensure that all Action Areas are working towards improving health outcomes associated with climate impacts
- For Action Area 1, CO3 - there is a need for equitable outreach to extend beyond digital technologies i.e. the online platform. A concerted effort should be made to connect with those disproportionately impacted by climate change in avenues that are community-preferred. That is to say, meaningful engagement needs to meet people where they are.
- Equity Considerations, Action Area 1, CO4 - communities who have been long impacted by fossil fuels/hazards should receive the environmental and economic benefits of clean energy production. See Justice40 Initiative.

Subject: UMD SGA Sustainability Committee Comment on the Draft CAP

From: nikjeff@umd.edu <nikjeff@umd.edu> On Behalf Of SGA Director of Sustainability

To: Crooms, Andrea L <ACrooms@co.pg.md.us>

Date Sent: Wednesday, December 15, 2021 9:12 PM GMT-05:00

Attachments: University of Maryland SGA Comments_ Prince George's County Draft CAP.pdf

Dear Andrea,

I apologize for getting this to you so late! Finals has been intense for everyone, and lots of folks wanted to be involved. Thank you for reaching out to us and thank you for coming to speak with us.

Feel free to keep in touch and let us know what other opportunities there are for students to get involved in the work of the Department of Environment!

Best,

Nina Jeffries
Director of Sustainability
Student Government Association
University of Maryland, College Park
email: nikjeff@umd.edu
cell: (240) 468-4598



CAP 30-Day Public Comment Period-Email and Mail from Organizations
University of Maryland Student Government Association
Sustainability Committee (SSC)



Comment on the Draft Prince George's County Climate Action Plan (CAP)

SSC is the body of the University of Maryland's Student Government Association responsible for representing the environmental interests, concerns, and ideas of the student body. Collectively, we are studying many of the disciplines and issues that intersect with the CAP. Our areas of study range from Computer Science to Agricultural Economics, Government and Politics to History, Environmental Science to Psychology and Criminology. As students, we study areas relevant to the CAP and care deeply about the world we grow up in and will ultimately steward.

The University of Maryland, College Park is located in northern Prince George's County. Prince George's County is the second most populous county in the state of Maryland, with the majority of its residents being Black/African-American. Folks in the county have some of the highest rates for asthma, cancer, and respiratory disease in the state. The University of Maryland has the responsibility to conduct its activities in a responsible, equitable, and transparent manner. Our campus footprint is immense, from carbon emissions to toxic air pollutants, our activities undeniably have consequences for the surrounding county. As the SGA Sustainability Committee, we advocate for policies to address the pollution from industry, commuters, the university fleet, deliveries to campus, construction equipment, sports games, the campus natural-gas power plant, solid waste, and more. Our goal is to ensure the university takes accountability for our environmental, economic, and social impact.

Our recommendations incorporate knowledge from our studies and embody the University's commitment to conducting ourselves as excellent neighbors and sustainable ambassadors.

As the next generation of Prince George's County residents, **we urge the you to consider our recommendations for the final Climate Action Plan:**

Carbon neutrality by 2030 with a 50% reduction in carbon emissions by 2025, without the use of carbon offsets. While these demands are substantial, they are necessary when considering the realities of our current climate crisis. The consequences of climate change are already being felt by residents of Prince George's County as impacts from flooding, extreme heat events and natural disasters are felt more frequently, year after year. As environmental damages to air and water quality continue compounding, so too does the risk to public health. To enhance the quality of life for the next generation of Prince George's County residents, as well as humanity on a global scale, we must do our part to extensively reduce greenhouse gas (GHG) emissions. Rather than simply aligning with the state of Maryland's current reduction goals, we



CAP 30-Day Public Comment Period-Email and Mail from Organizations
University of Maryland Student Government Association
Sustainability Committee (SSC)



not advocate for more aggressive reduction. The University of Maryland itself has pledged to achieve carbon neutrality by 2025.¹

Establish all electric building codes for new construction and significant redevelopment. Commercial and residential building emissions make up 45% of the County's GHG emissions. Reducing the use of natural gas is imperative, and if buildings are all-electric there is no need for gas appliances (stoves, boilers, etc.) in buildings. The county should not approve any permits for construction that do not meet this all electric code. This is feasible at the county level, as it was included in the Montgomery County 2021 Climate Action Plan.² As students at the University of Maryland, this issue is of personal concern as the University seeks to renew the natural-gas fired power plant that runs our campus. By creating a future of electric building codes in our county, we can put a stop to the continued creation of the natural gas infrastructure driving climate change.

Prince George's County Government to purchase 100% renewable energy by 2030. Renewable energy should not include energy generated from trash incineration, poultry litter incineration, paper mill-waste burning, and other energy sources that have significant adverse health impacts on those living near said energy generation facilities. Relying upon, and subsidizing, such generation methods directly opposes the tenets of environmental and climate justice, particularly when these facilities are hosted within the County and harming Prince George's residents. There should be no "sacrifice zones" within our County. Schools, community colleges, and other facilities associated with the County should follow this mandate. Schools and community colleges should be purchasing 100% truly renewable energy by 2025.

Expand tree cover in Prince George's County to 55% by 2028, with an emphasis on conserving and expanding established forest canopy. The County should perpetually set incremental goals for increasing tree cover and forest cover. The proposed "No Net Loss" recommendation includes a one-to-one replacement compensation for all trees lost through land disturbance. Such policies allow the county to remove existing trees, as long as new trees are planted elsewhere. New trees take decades to sequester the same amount of CO₂ that mature trees do, therefore the County should adopt a "proforestation" technique to maintain existing tree cover to properly account for the distinct sequestration abilities of mature and new trees.³ The County should simultaneously engage in reforestation efforts, with a prioritization of planting new trees in historically disadvantaged neighborhoods experiencing disproportionate impacts from the urban heat island effect and poor air quality.

¹ <https://sustainingprogress.umd.edu/measuring-progress/carbon-neutrality>

² <https://www.montgomerycountymd.gov/green/Resources/Files/climate/climate-action-plan.pdf>

³ <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>



Tree cover expansion goals should prioritize efforts by ZIP CODE, especially regions with markers of historical disadvantages (linguistically isolated, low-income, marginalized groups, etc.). The proposed “No Net Loss” recommendation is inadequate. Tree cover is a natural form of green infrastructure that provides a variety of ecosystem services, including: stormwater management, air and water purification, and mitigation from the urban heat island effect. Additionally, access to green space is a known marker of better health outcomes and better quality of life. By limiting tree cover protections and expansion goals to certain regions, Prince George’s County is at risk of continuing to perpetuate long-standing concerns of environmental justice and widening the amenity, health disparity, and opportunity gaps between wealth classes.

Incorporate the Maryland National Capital Parks and Planning Commission (MNCPPC), Prince George’s County Community College System, Prince George’s County Public Schools, and all other related public and private facilities WITHIN Prince George’s County government emissions. These entities contribute largely to emissions throughout Prince George’s County and are funded by Prince George’s County taxpayers. It, therefore, does not stand to reason that the aforementioned parties are not held to the same standards for climate action and sustainability as the rest of the Prince George’s County governance. The status quo of holding these entities to State standards, rather than County standards, creates a glaring loophole whereby GHG and other pollution emissions go unaccounted for and, likely, unchanged.

Explore and address ethical concerns within the formulation of Prince George’s County Climate Action Plan. The presence of the fossil fuel industry on the Climate Action Commission is an egregious example of their undue influence on the public process. There are very few regulations on industry within the CAP draft, which speaks to a prioritization of the needs of industry over residents of the County. While being one of the most significant sources of GHG emissions in the county, the issue of “natural gas” is only addressed nine times through the CAP draft, compared to 53 times in the Montgomery County CAP plan and 52 times in the Howard County CAP plan.⁴ These statistics become even more concerning when we take into account that Montgomery County has only a single natural gas plant and Howard County has none, while Prince George’s County has three. Further, Montgomery County’s plant only has capacity to produce a fifth of the energy of the Prince George’s County plants.

Natural gas is not “clean” and we cannot afford to perpetuate these deceptive narratives spread by the fossil fuel industry. Natural gas production leaks enough methane to match the climate impact of coal-burning plants for two decades.⁵ Natural gas is detrimental to the climate

⁴ https://livegreenhoward.com/wp-content/uploads/2018/05/HCM_2015_Climate-Action-Plan_Sept2015_eversion.pdf

⁵ <https://www.science.org/content/article/natural-gas-could-warm-planet-much-coal-short-term>

⁵ https://www.ipcc.ch/site/assets/uploads/sites/2/2019/02/SR15_Chapter2_Low_Res.pdf

⁶ <https://www.census.gov/quickfacts/fact/table/princegeorgescountymaryland/PST040219>



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em. Prince George's County must establish stringent barriers to prevent the fossil fuel industry from hijacking the public process, for the well-being of all residents within Prince George's County. Washington Gas should not have been included in this process.

The plan should include various scenarios based on anticipated changes to the Maryland RPS by the state legislature. The IPCC recommends that we achieve carbon neutrality globally by 2050, and the state will likely be adjusting the RPS to meet this.⁵ The current RPS goal involves 50% reliance on renewables in 2030, and it is likely this will be developed to become a 100% renewable/Tier 1 RPS requirement for 2050. The draft CAP has an easily interpretable layout for their projected progress in meeting the 2030 goal, and giving the public insight into other ways that these changes could be made would be helpful.

35% of housing units should be retrofitted and 50% of housing units should be installed with residential or community solar by 2030. According to the 2019 census data, there are 335,752 housing units in Prince George's County.⁶ The draft CAP (page 26) sets a goal of achieving retrofits and 80,000 residential or community solar installations. This would be 17.8% of housing units retrofitted and 23.8% would have residential or community solar installations. There should be an emphasis on retrofitting multi-family and lower income homes at little or no cost to residents.

The reliance on individual level solutions as opposed to systemic solutions is problematic. A pay-as-you-throw recycling system is not equitable. The responsibility for recycling lies with the corporations and companies that choose to produce plastic products. The county should be more strict with what types of plastics it allows to be sold in the county. These companies should pay the cost of maintaining the county's recycling programs, not individual citizens.

All permits for new (or significant redevelopment) fossil fuel projects should be denied. To keep climate change within 1.5 degrees celsius, we cannot create new reliance on fossil fuels. This should include power plants, drilling, compressor stations, pipelines, or any other infrastructure that expands reliance on natural gas.

Additional Comments/Questions by Section:

- I. **Vision for the plan** - no recommendations
- II. **Understanding the CAP** - no recommendations
- III. **Scope of the plan**- no recommendations
- IV. **Greenhouse Gas Emissions and GHG Trends**
 - A. "The single most significant factor reducing Prince George's County's GHG emissions was an increase in clean energy sources of electricity and the phasing



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out of coal power in favor of natural gas between 2005 and 2012.” (P 23, : the PDF) - Why is natural gas considered a ‘clean’ energy source?

- V. **Climate Hazards in the County** - no recommendations
- VI. **TAKING ACTION: 26 of their recommendations**

A. County Operations

1. CO-1 Build internal capacity to plan and implement climate action
 - a) Will fossil fuel companies be excluded?
 - b) Will the cost benefit analysis recommendations be binding?
 - c) How in depth will the climate change training for staff be? Lunch and learns and a climate 101 module seem like the bare minimum.
 - d) More info on step 8: what does it mean to integrate climate change skills in job descriptions? What is a climate change skill?
 - e) What qualifies as a climate focused position? Why does it matter how many job descriptions have climate added; this does not seem rigorous.
 - f) Will you make climate education material for staff also available and accessible to the public? Will the Prince George’s County Resilience Authority be transparent about funding sources?
 - g) How will you guarantee that the funding sources exist for the various needs outlined?
2. CO-2 Lead by example and ensure transparency in climate action
 - a) Will the detailed inventory in step 2 be made public? Why or why not?
 - b) How will you ensure divestment in fossil fuels? What counts as a fossil fuel investment?
 - c) Why is mowing equipment allowed to be hybrid by 2025? Other jurisdictions are moving more quickly in this regard; why can’t Prince George’s County?
3. CO-4 Commit to clean and renewable energy - “County’s task is to advocate for a statewide 100% Renewable Portfolio Standard, develop its own transition plan toward renewable energy, and eliminate any practices or policies that support the continued long-term use or distribution of fossil fuels”
 - a) Have you considered a no new gas infrastructure ban, all electric building code, etc.
 - b) Will new permits asking to continue fossil fuel systems be denied?
 - c) Why only divest by 2025? Can this goal be accelerated?
 - d) Will there be dedicated funds for Just Transition goals (ie supporting workers transitioning from the Fossil Fuel industry)?

B. Mitigation



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1. M-5 Develop a community-wide EV deployment strategy
 - a) The description of how market factors will be influenced needs to be in greater detail.
 - b) What market forces will be influenced?
 - c) Maryland's goal is to have 600,000 EVs by 2030
 - d) PG County has 620,000 vehicles on the road. The goal is to convert 15% of that to EVs.
 - e) Currently this is just a "deployment strategy" which means that the strategy is expected to take 0-3 years to develop. Actual implementation of the plan is likely to take much longer. There should be an estimate of how long implementation is expected to take. Will it meet the 2030 goal?
 2. M-10 Expand County waste reduction and diversion efforts
 - a) Excited about the county wide single use plastic bag ban
 - b) How will the ban be enforced?
 - c) What is the timeline for the ban?
 - (1) When will the advertising for the ban start?
 - (2) How long will you give people to prepare?
 - (3) When will it start?
 - d) Will reusable bags be subsidized?
 - e) What will be considered a reusable bag?
 - f) Who is responsible for implementing this?
 - g) What work will be done to clean up single use plastic bags?
- C. Adaptation
1. A-9 Adopt codes, standards, and practices to support climate ready green buildings and development
 - a) Change zoning laws so that forested space cannot be forced to upzone.
 - b) Approvals for old projects should expire. The approval of the Mosaic project, even though the project was scrapped, is a key reason that Guilford Woods is being forced to upzone

VII. Next Steps - no recommendations

VIII. Priority Recommendations- no recommendations

Thank you for your consideration of our comments. We hope to see our feedback reflected in the final CAP.



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December 1, 2021

Mary Abe
Prince George's County Department of the Environment
Climate Action Plan
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Largo, MD 20774

Dear Ms. Abe,

Thank you for the opportunity to comment on the draft Prince George's County Climate Action Plan (CAP). I'm writing on behalf of the Prince George's County Sierra Club's Zero Waste Team to share our comments on the CAP's recommendations on waste reduction and diversion. We're very pleased to see a Climate Action Plan emerge with Waste Reduction and Diversion recommendations are among the priorities.

Waste reduction and diversion are critical to the Climate Action Plan

The anaerobic decomposition of organic materials in the Brown Station Road Sanitary Landfill produces methane, some but not all of which is captured by an on-site collection system. Methane accounts for about half of all landfill gas; another 42 percent is carbon dioxide (CO₂). However, over a 20-year timeframe, methane has a global warming potential 84-86 times greater than carbon dioxide (CO₂).¹ Thus, reductions in methane emissions will yield large benefits in a relatively short timeframe, compared with reduction of CO₂ emissions.² According to research by the Environment Integrity Project, nine of the top ten methane-emitting facilities in the state are municipal solid waste landfills, and *at the top of the list is the Brown Station Road Sanitary Landfill.*³ According to the 2014-2015 Waste Characterization Study, 29% (87,500 tons) of municipal solid waste that year was compostable, comprised of vegetative and non-vegetative food, compostable paper, and leaves, grass, and brush.

Reducing waste and diverting organic waste from the landfill – either by reducing, donating, or composting it – will reduce greenhouse gas (GHG) emissions from waste collection, transport, and disposal. Composting produces a valuable soil amendment and the County is fortunate to have one of the largest food scrap composting facilities on the East Coast. The County is better equipped than any other one in Maryland to address this issue.

While it is not explicitly discussed in the CAP, the widespread consumption of single-use plastic – which is derived from fossil fuels – is also contributing to climate change in Prince George's County and disproportionately impacting the health of fenceline communities. There are substantial GHG emissions in the extraction of fracked gas and oil and in the conversion of fossil fuels to plastic in petrochemical plants. About 40% of all plastic currently produced is for single use – used for a short

¹ <https://www.scientificamerican.com/article/how-bad-of-a-greenhouse-gas-is-methane/>;
<https://unece.org/challenge>. Methane remains in the atmosphere for a much shorter time than does CO₂ but with much greater potential for atmospheric warming. Over a 100-year timeframe, methane's global warming potential (GWP) is 28-34 times that of CO₂.

² <https://ccacoalition.org/en/content/short-lived-climate-pollutants-slcps>

³ Leah Kelly and Ryan Durant, Environmental Integrity Project, letter to Eddie Durant, MDE, on "Public Stakeholder Process for Setting New Air Quality Regulations for the Control of Methane Emissions from Municipal Solid Waste Landfills." October 15, 2020.

time (sometimes minutes) and then tossed. Most of these items – single-use carryout bags, utensils, straws, condiment packets, and other containers – are not recyclable and there are less harmful alternatives available. Fortunately, there are no fracking operations in our County, but our high and growing consumption of single-use plastic generates demand for extraction and petrochemical production elsewhere that fuels climate change and environmental and health inequities.

Priorities for addressing climate change through waste reduction and diversion

We'd like to respond to and amplify priority recommendation M-10, "Expand County Waste Reduction and Diversion Efforts." The CAP has a 3-5 year horizon, and much can be done!

1. ADOPT A ZERO WASTE PLAN

The principal recommendation of the "Zero Waste Initiatives" report of 2018 was for the County Council "to adopt a zero waste goal and a costed, prioritized plan to achieve it, while incorporating it into the Ten Year Solid Waste Management Plan." We're glad to see this as a priority in "step 5" of the CAP, but it really should come first! Also, earlier in the CAP (p. 85) there are suggestions that zero waste goals are already being set, and on page 87 it suggests that there's already a Zero Waste Implementation Plan that the County Council merely has to approve. *This is not the case!* There is no costed, prioritized plan, even in a draft form, nor is there any specific goal. Even the recycling goal has not been revised since 2012.

2. PROVIDE UNIVERSAL ACCESS TO FOOD SCRAP COMPOSTING, LEADING TO A BAN ON FOOD WASTE IN THE LANDFILL

With the Maryland Department of the Environment already in the process of strengthening landfill methane regulations, expansion of food scrap composting countywide is the most impactful opportunity for the County to reduce landfill methane emissions. This is a central and laudable recommendation of the CAP. However, ensuring access to these services is not sufficient; after a rollout of access, participation must become mandatory. We recommend a timeline for the rollout of access to food scrap composting and eventually mandatory participation, with a ban on food waste in the landfill.

- Access to residential curbside food scrap collection to **households in unincorporated areas currently serviced by County trash and recycling** services by **July 2022**.
- Access to drop-off food scrap collection to all **households in unincorporated areas** not receiving County curbside trash collection by **January 2023**.
- Access to food scrap collection by all **multifamily residents** by **January 2024**.
- Mandated composting of food scraps in all County **public schools** by the **2023-24 school year**.
- Ban on food scraps in the landfill as of **January 2030**, when the voluntary program would become mandatory.

Although the County has no control over food scrap collection in municipalities, the date certain for the landfill ban on food waste would serve as a powerful incentive for them to follow suit. A separate incentive introduced by the passage of HB264 requires that by 2024 entities generating a ton of food waste weekly and within 30 miles of a composting facility that can handle it, to reduce, donate, manage it on site, or send it for composting or agricultural use. This will be a boost to the movement to mandatory business food scrap diversion.

A bonus of mandatory food scrap collection is that it will reduce the amount of residual waste to be collected, reducing the need for twice-a-week trash collection that some municipalities still maintain, also reducing GHG emissions associated with multiple collections.

3. CURB THE USE OF SINGLE-USE PLASTIC

Prince George's County has already taken steps to reduce the impact of single-use plastic through its ban on expanded polystyrene food containers, plastic straws, and plastic bags in yard waste collection, but there are many more opportunities:

- Ban plastic carryout bags and mandate that stores charge 10-cents for other bags (paper, reusable), to incentivize reusable bag use. We applaud the CAP's support for ridding the county of single-use plastic carryout bags by a ban or a fee, but the "hybrid" plastic bag ban with a mandatory charge on other bags has been shown to be the most effective approach. The County has tried for a decade to get the General Assembly to approve a 5-cent tax on disposable bags, unsuccessfully. Now's the time to ban plastic bags; the county can't tax paper and other bags, but it *can* mandate that stores charge for them, to incentivize reusable bag use.⁴
- Require that food service businesses to provide straws, stirrers, plastic cutlery, and condiment packets only when the customer requests them, to prevent plastic pollution, reduce trash, conserve landfill space, and save money for businesses. These policies have reduced use of single-use implements in one study by 40%. There are many localities in the U.S. that have adopted them, and these laws have passed statewide in California, Washington State, and Washington, DC.
- Ban plastic food ware made from plastic resins that are not recyclable—specifically, rigid polystyrene (#6) food containers. The County recycling facility does not accept them because there's no market for polystyrene; these containers go straight to the landfill. There are plenty of recyclable or compostable alternatives. Prince George's County should follow the lead of Montgomery County, which has banned all #6 food ware.

4. LOBBY FOR A MARYLAND BEVERAGE CONTAINER DEPOSIT PROGRAM

Ten states have adopted these programs with decades of experience on what works and what doesn't work. Beverage container deposits ("bottle bills") are perhaps the best-documented anti-litter program in existence and produce very high recovery and recycling rates for beverage containers. A Maryland beverage container deposit program with a 10-cent deposit would reduce roadside litter and raise the recovery rate for recycling of beverage containers from about 28%⁵ to as high as 90%. It would remove much of the glass from recycling operations and recover it for reuse in making new bottles, instead of crushing it for macadam or landfill cover – this is *already* a proven "robust and profitable glass recycling opportunity." (pp. 87, 174) A bottle bill would also divert from the County landfill the part of the 11-12% of municipal solid waste represented by recyclable beverage containers.

The CAP (p. 175) advocates for piloting reverse-vending machines in public places, but their best and most effective use would be in a return-to-retailer program with a refundable deposit. They are already in use in the other 10 states with bottle bills and don't need to be piloted locally with no deposit, which will result in a much lower return rate.

⁴ The CAP encourages educating shoppers to "recycle" their plastic bags at stores, leaving the impression that they are actually made into new bags. In fact, few of them are processed, and they are not made into new bags. They are "downcycled" into other products.

⁵ Estimated beverage container recycling rate for Maryland by the Container Recycling Institute.

5. ESTABLISH A GRANT PROGRAM FOR BUSINESSES PROMOTING REUSABLES AND REFILLABLES

Across the country, start-up businesses are developing a new paradigm of reuse and refill. Takeout restaurants are developing service models with reusable, returnable containers. Breweries in some states are switching to signature refillable bottles. The “return” aspect of these programs brings in foot traffic. The County could offer grants to local businesses to set up these programs; many of them require an investment in industrial dishwashing facilities.

6. ENFORCE PRODUCER RESPONSIBILITY

Local and state legislation can make producers responsible for reimbursing local governments for the costs of recycling their products, for managing (with public oversight) the end-of-life of difficult-to-recycle products, and even more important, for reducing waste and improving recyclability through redesign. The simplest way is to tax manufacturers of single-use products and packaging and distribute the revenues to local governments as a reimbursement. Support for product stewardship bills in the Maryland General Assembly make manufacturers of hard-to-recycle materials, like paint, mattresses, and batteries, responsible for collecting and processing them, with public oversight, and can also hold manufacturers accountable for achieving waste reduction and recycling targets.

7. CREATE A RESOURCE RECOVERY PARK

Many gently-used bulky items, like furniture, bicycles, and appliances are collected and deposited in the landfill. The County should finance a Resource Recovery Business Park to accept, refurbish, repair, and sell these items, pulling in existing repair businesses or creating new local jobs for resource recovery and diverting big items from the landfill. We appreciate that the CAP has advocated for budget for a Reuse Center and tracking the tons of bulky material (furniture) diverted from the landfill (p. 176). It also recommends financing grants or subsidies to develop reuse businesses and promote donation of materials. This can be built into the project expanding the landfill to Area C.

Again, congratulations on completing the CAP document. We hope that these comments provide more detailed justification for and content to the recommendations will be useful going forward in minimizing the impact of waste on climate change.

Sincerely,

Martha Ainsworth, Chair
Prince George’s Sierra Club Zero Waste Team
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