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February 17, 2021

Mr. Douglas Weisburger, DEP  
Ms. Adriana Hochberg, CEX  
Montgomery County Maryland  
Executive Office Building  
101 Monroe Street, 2<sup>nd</sup> Floor  
Rockville, MD 20850

Dear Mr. Weisburger and Ms. Hochberg:

This letter is to follow-up on some initial comments I made as part of your presentation to the Montgomery County Faith Alliance for Climate Solutions meeting on January 19<sup>th</sup>.

Thank you for your outreach to the faith community concerning Montgomery County's Climate Action Plan. As a whole, our local faith community is a key sector which represents a wide variety of residents – spanning huge differences in wealth, income and employment status, nationality, culture, racial-ethnic identity, age, ability, levels of formal education, etc. My sense from that conversation and reviewing the Action Plan is that your outreach to various members of this community could be strengthened tremendously as one strategy for reaching deeper into under-resourced and marginalized communities which at best seem to have had only limited involvement in this process to date.

I applaud Montgomery County's ambition in setting GHG emission goals. Indeed, they are practically and morally necessary. We are fortunate to have a liberal political environment which enables us to be more ambitious and holistic in our sense of what needs to change than in some parts of the United States. As one of the more affluent counties in the US, we also have more financial bandwidth than many to implement such goals. Given this, my overall feeling is of disappointment that we are not yet living up to our potential in terms of how well we are advancing social and economic justice in our climate planning. If any county in the U.S. can really do it "right," I would hope we would be in the top tier. We can and we should.

While I have not yet had the time to read the full report in its entirety, please find below my top concerns from reviewing certain portions:

**1) *The meta frame is off.***

In looking at page 8, "Our Vision for a Healthy, Equitable, and Resilient Community" - the focus is on climate mitigation and adaptation and some of the governance and engagement processes related to achieving certain climate goals. Certainly a healthy, equitable and resilient community is larger than this. What are the markers and milestones beyond net zero carbon emissions? Racial justice and equity? A county where everyone feels safe and is housed? Where there is economic opportunity and security? I would suggest that the CAP needs to be embedded in this larger frame - so equity measures are not secondary compensation/remediation (as they are in some of the draft MoCo CAP sections), but rather - **drive the entire plan** -- as well as drive the related economic development plan and other planning efforts.

While far from perfect, **The Star Community Index** offers an example of a broader framework for sustainability that focuses on climate mitigation and adaptation, but integrates economic and social well-being throughout. The link below is not the latest version, but will give you a flavor....  
<https://share.ansi.org/shared%20documents/Meetings%20and%20Events/Smart-Sustainable-Cities/3.1 Varnadore ANSI SSC 112113.pdf>

**2) *One of the major concerns I have is that the MoCo Economic Development Plan and the County Budget won't be developed with enough integration/synergy with the climate plan [and vice versa].***

The MoCo CAP focuses on mitigation and adaptation efforts, processes and structures for engagement and decision-making. As you will see from the Star efforts, it integrates economic and social objectives along with environmental, budgetary and long-term planning for a more well-rounded approach - knowing that energy use is only one factor in a larger whole. It also may be helpful when county leaders start to develop more specific metrics/targets/milestones in all of the action areas so we can track our progress and lessons learned. When I was involved with this, perhaps the most advanced county in the US involved in the leadership of STAR was King County in Washington state. If MoCo officials have not been in touch with them, that might be a great idea. They have done all kinds of equity assessments which I do not know that MoCo has done.... Also - Portland, OR has a special tax on high-earning corporations that helps fund equitable, sustainable efforts in the city. An interesting coalition of folks got it passed there. I am aware that folks are trying to replicate this victory elsewhere. Might be something for Montgomery County to explore???

**3) *Engagement processes. I also want to flag from my past experience with the County that a robust education & engagement plan should be in place and activated now, if it hasn't already begun,***

***to get community members involved with the long-term planning effort Montgomery Thrive 2050 and linking it with finalizing the CAP.***

I say this for several reasons:

a) the draft CAP sets some directions without sufficient acknowledgement that the underlying land use patterns/planning and economic development strategies will have much to do with the success or failure of the desired GHG objectives (such as those in the Buildings and Transportation sector, for example), and

b) zoning and long-term planning exercises are not the most appealing of activities for the average resident, particularly for those who may be working multiple jobs, have childcare or elder care responsibilities, are disabled, and/or whose primary language is not English. It is daunting and generally unappealing to many people who do not fit any of those categories as well. My experience is that usually only elected officials and developers show up - and maybe a concerned (small) business or two. And, it is my experience that this is not the arena where your desire to have "outside the box" ideas tend to show up. There are ways to create engaging, authentic, educational experiences which solicit meaningful input from average folks, and generate more cutting-edge approaches, but this requires longer lead time, multiple methods, trust-building, knowledgeable outreach, etc. Given your time frame for decision-making, you don't have much time...

**4) Insufficient implementation strategies and concrete steps.**

To use an overused phrase – the devil is in the details. This is particularly true when people aspire to advance racial and social justice. I would like to second some comments that David Kathan, who serves on Montgomery County's Energy Working Group made re: the CAP. We both feel that there are insufficient implementation strategies and steps spelled out to actually assure that you meet your lofty goals. One example of this lies in "equity-enhancing measures" which may include financial support for low-income communities to adapt. Another: how will low-income, immigrant, and BIPOC residences and businesses be able to switch from gas to electric? Where will the financing come from, how sufficient will it be, and how will this be carried out in a way that renters, and immigrant-owned small businesses, for example, will not get displaced?

Too often "smart growth" is actually "dumb growth" because economic and social concerns are tacked on at the end, only after the fact – when it is too late. The gentrification which has occurred along the Red Line during infill development is a stunning case in point. Similarly, Montgomery County has been extremely slow and not sufficiently proactive in its approach to handling these same concerns

related to the Purple Line construction. This does not bode well for implementation of the CAP.

Needless to say, without forethought and strong planning protections for residential and commercial rents, housing availability, and small businesses, as well as particular projects geared to growing them, standard climate plans exacerbate existing inequalities in these arenas.

Have you considered some kind of local/regional economic equity summit to help with further CAP refinement and long-term economic planning? We have so many great groups in the area to tap...

***5) I would encourage even greater ambition and vision in the CAP objectives.***

***One example for the MoCo CAP: Greater ambition and linkage with public schools.*** The CAP talks about enhancing public school curricula to promote greater awareness of climate change and its consequences and how people can do their part to reduce their footprint and adapt. That is well and good. However, the plan misses a major objective - which is working with the school system to have a long-term plan of renovation and new construction of public school buildings to serve as models of sustainability, justice and net-zero emissions for their neighborhoods. These buildings can serve as immediate tangible sources of inspiration to all who relate to them. They can be experiential teachers themselves by everyone's daily interactions in the building and grounds. Moreover, the facilities can be linked with the curriculum to meet other kinds of equity goals beyond LEED certification. They also can serve as important sustainability and climate justice hubs for neighborhoods, especially those located in low-income and communities of color, etc. For example, where appropriate, they can grow food for on-site consumption. **Virginia Beach, VA** offers some very exciting examples of such schools and they have an impressive long-term capital improvement plan in place.

In case this would be helpful, here are just a few suggestions of diversity and equity thought leaders in a couple of sectors who might be helpful resources in creating much more ambitious and cutting-edge diversity and equity goals and implementation strategies:

**Building electrification:**

- **Emerald Cities Collaborative** -- Electrification is a key initiative of theirs at the moment with a focus on justice, jobs and equity. They held a summit on this topic in the fall of 2019 and recently held a major virtual "teach-in" of sorts. Their tech guys are out on the West Coast. <https://emeraldcities.org/>

Here is the link to their 2020 report on Building Electrification & Equity:  
[https://emeraldcities.org/hifi/files/BEE\\_Report\\_Final.pdf?mc\\_cid=eacf5d91d0&mc\\_eid=5daf7d3b51](https://emeraldcities.org/hifi/files/BEE_Report_Final.pdf?mc_cid=eacf5d91d0&mc_eid=5daf7d3b51)

### **Jobs/Economic Well Being**

- **Private Sector Climate Justice** - Donna Hope has just been hired to be the new Climate Justice Director for a joint Emerald Cities and NAACP Environmental and Climate Justice Program focused on working with the private sector on climate justice. As you seek to build out the economic development plan and work with businesses - Donna might be a good person to consult with. I believe you will be able to reach her through Emerald Cities.
- **Labor Network for Sustainability** -- have staff located in Maryland and at least one in MoCo! Currently, Transportation Equity is a key theme. They can advise across a variety of thematic goal areas in the plan. This is a link to their staff list. Joe is the one person I know lives locally - and there may be others - as they have a MD organizer, for example.  
<https://www.labor4sustainability.org/about/staff/>
- **Democracy Collaborative:** These good folks specialize in building sustainable, equitable local economies and have some exciting projects in various cities around the US. They were started by folks based at the University of Maryland, located for awhile in Takoma Park, and now have a much larger staff and portfolio of accomplishments. They are now based in DC. There are many appropriate staff who could help. For example, one of their Senior Fellows is the former ED of Impact Silver Spring, Ronnie Galvin. Here is the link to their staff and mission: <https://democracycollaborative.org>

Thank you for your consideration of these points. I hope they may be helpful. I will look forward to seeing how the CAP is revised and the longer-term planning is conducted.

Sincerely,

Pamela Sparr