

COG's Multi-Sector Working Group

Public Comments Received during April 9-22, 2015 Comment Period

Section 1: Website and email comment submissions

Section 2: Air & Climate Public Advisory Committee Comment Summary

Section 1

Marchant Wentworth, Individual

Expand the use of pervious payment and other stormwater reduction measures particularly in NE Boundary sewershed and RFK parking lots.

Refrain from building waste to energy plants and additional nuclear power units because they are expensive, not a global warming solution and displace other more effective solutions.

Work to implement the DC Community Solar bill.

Use LID to control stormwater where appropriate coupled with performance criteria and milestones to measure CSO reductions.

Alan Muchnick, Non-Profit

Strategy T-12, Enhance the bicycle/pedestrian environment should include a recommendation to connect neighborhoods with cul-de-sac street development with short paved trails across stream valleys, especially where the land use is nonresidential on at least one side of the valley. This approach could cost effectively increase walking and bicycling trips by both shortening trip distances and by providing low-traffic, low-stress direct walking and bicycling routes.

Sadly, most of the post-World War II (and especially post-1970) suburban development in the Washington region has created local disconnected pods of development, rather than require a connected urban street grid. While there may be much resistance to retrofitting such trail connections from nearby property owners, this resistance can be overcome by making it a regional recommendation endorsed by local governing bodies and by fairly paying property owners for any new easements on their property.

Localities should analyze the street networks in their communities to prioritize those locations where establishing a short trail or local street connection could have the greatest transportation benefit. Utility corridors (water, sewer, gas, electric, etc.) should be considered prime candidates for these new connections because the easements already exist.

Moreover, the local practice of failing to require developers to provide local street and trail connections to adjoining parcels and neighborhoods should end now.

Rob Jackson, Individual

These comments are my own and, therefore, do not necessarily represent the views of any organization with which I am affiliated.

I think it is important to keep focus on ensuring there are multi-benefits for adopted strategies. First, as Staff indicated at the April CAC meeting, a number of strategies do not have positive benefit-cost ratios based on limitation of greenhouse gases alone, but do when other benefits are concerned. Second, by focusing on adopting strategies that provide benefits beyond greenhouse gas limitations (such as timing of traffic lights to improve traffic flow) TPB's efforts are likely to be perceived as less "political" in nature and are likely to have broader support among the millions of diverse residents of the Greater Washington Area, not all of whom subscribe to all the points related to climate change/global warming. It's better to achieve broader consensus on some strategies than to have political fights over many.

I believe we need to keep in mind the significant slowdown in personal income growth in much of the Area. Cutbacks in federal spending and government contracting have cost many of our neighbors both jobs and income. Many younger people have also had trouble finding positions equivalent to their education and training. Also, low interest rates, while providing benefits to borrowers, have reduced incomes of savers, including many who are retired or semi-retired. Many of these people have benefited significantly from a financial perspective from the drop in fuel prices. IMO, we should not be cavalier on the issue of gas tax increases, but factor their impact on residents of the Area as well. Similarly, higher fuel prices make it more difficult for residents and businesses to upgrade their assets, such as by purchasing more fuel-efficient vehicles, insulating homes and other buildings, installing more energy efficient windows or purchasing more efficient appliances. In the long-run, reducing personal income is not a positive strategy.

Also, if we were to dig deeply or even shallowly, we would find major cross-subsidies in transportation funding. For example, the University of Virginia found there were massive (greater than \$200 M annually) subsidies from gas tax payers to overweight trucks. Trucks with permits paid fees that covered but a fraction of the damage they caused to bridges and roads. Similarly, local governments in Virginia regularly fail to negotiate and collect proffers (either in cash or in kind) that recover the costs of new development on local roads. I suspect there may be similar subsidies in the District and Maryland. I think it is wrong to force taxpayers to fund these subsidies. Eliminating them would free more money for needed transportation projects.

Thank you for considering these perspectives.

Stewart Schwartz, Coalition for Smarter Growth

The following are land use and transportation comments (submitted April 16).

The Coalition for Smarter Growth will submit formal comments before next week's April 22nd deadline, but with your meeting at 9 am we wanted to share a few quick thoughts.

First, we appreciate your working on this important issue and we regret that a number of issues have cut into our direct engagement -- including trying to save the Purple Line and supporting key TOD projects.

Second, we concur with the recommendations of MDE that the implementation steps include regular reporting of progress including reporting of GHG emissions changes with each conformity analysis and with TIP updates, and that the greenhouse gas emissions results of major development projects be reported.

We also concur with the majority of comments by Nicholas Bonard of the National Capital Planning Commission and second the recommendations of policy documents to consult by Rachel Healy of WMATA.

In that vein, additional sources for implementation measures have been suggested by Deron Lovaas of NRDC:

From NYS: http://www.dec.ny.gov/docs/administration_pdf/irchap7.pdf (see esp. Table 7-7).

Also: At the end of the SB743 Document for changing LOS to VMT, there is a tool put together by the Air Resources Board that is entitled "Quantifying the effect of local government actions on VMT." http://www.arb.ca.gov/research/single-project.php?row_id=64861

There's also the CAPCOA Quantifying Greenhouse Gas Mitigation Measures report that might be helpful: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

There are also 27 VMT related documents in the Reconnecting America best practices database: <http://www.reconnectingamerica.org/resource-center/browse-research/Tag/484/>

Because not all of the strategies outlined in the documents recommended by NRDC and WMATA may not yet be included, we hope you will take some time to review and incorporate relevant strategies prior to finalizing your implementation measures for further evaluation.

We are very concerned about strategy T-6:

Apply cost-effective roadway improvements to reduce bottlenecks, minimize congestion, and improve safety. May include:

New roadway capacity

Major intersection improvements/conversion to interchanges

(Steward Schwartz, Coalition for Smarter Growth, continued)

Most if not all short term congestion reduction benefits will be erased due to induced land use and induced traffic effects and spending on these project will divert scarce resources from the transit, local street grid, bike/ped and other walkable TOD supportive investments that need to be made.

In addition to the comments we submitted on April 16th, we offer the following additional comments:

- 1) Political feasibility is not an appropriate screen for this technical analysis. It is about as subjective a factor as one could imagine. We request that you delete this factor.
- 2) We concur with the bundling of strategies that are related to a walkable, bikeable TOD environment, rather than splitting up many of the beneficial measures into a number of subsets. In effect we would like to see the full benefits measured for TOD/jobs moved east, housing near jobs and transit, bike/ped/local street networks, parking pricing etc.
- 3) We would like to specifically call on the MD and VA DOTs to stop trying to protect highway building as a sacred cow and to think about and assume the greater responsibility to address the most significant environmental, economic and national security challenge of our century. Perhaps we are misjudging intentions but experience has shown a strong resistance to shifts in policy and funding to reduce VMT, support smart growth, and reduce greenhouse gas emissions.

Let's be the leading region in the country in using land use and transportation measures to significantly cut greenhouse gas emissions.

David Jonas Bardin, Individual

19 April 2015 - please see also my citizen comments at TPB meeting of April 16.

A) Your attention to co-benefits is crucial. Thank you. Revenue raising co-benefits are likely to be particularly important.

B)

1) Please also explicitly list / name "Parking taxes" (like DC's 18% tax, proposed to go up to 22%) as a GHG reduction strategy.

2) Congestion pricing and Cordon pricing, Electronic tolling ("EZ Pass"), and Parking taxes seem especially promising GHG reduction strategies.

C)

1) Please give extra weight to co-benefit revenues which are themselves dedicated and used to advance our regional strategic goals.

2) Please analyze all (or as many as feasible) of those revenue-raising strategies which are now in effect or proposed and pending in one or more jurisdictions in our regions with respect to uses of revenue:

a) dedicated to (i) local or (ii) regional transportation improvements generally;

b) dedicated to (i) local or (ii) regional public transportation improvements;

c) dedicated to bicycling improvements;

d) dedicated to pedestrian improvements;

e) dedicated to avoiding WMATA fare increases or service reductions (MetroBus and/or MetroRail);

f) otherwise dedicated to WMATA; or

g) not dedicated to transportation.

John Byrne, Individual

Design walkable communities

Require energy efficiency in all new and existing facilities

Connect parks to communities

Generate environmentally friendly energy

Require sidewalks to serve all housing.

Build sidewalks along all streets where none exist –except on interstate highways but build trails along them.

Provide a tax on fossil fuel products – e.g., gasoline – electricity, and on all products whose production generates greenhouse gasses – and use the revenue for carbon sequestration to compensate for more than the carbon dioxide generated in use of the fossil fuel products.

Nicholas Bonard, Individual

Comment 1: Add new Land Use Strategy

L-7 Regional Land Use Credit System

Each jurisdiction agrees to pay a substantial yearly fee to a new GHG reduction fund. However, this fee can be reduced, or even completely offset, by helping the region meet certain land use targets which are agreed upon by all COG members. The fund will help pay for GHG reducing projects – bike lanes, transit, canopy preservation.

COG members set regional goals for:

- Acres of Tree Canopy
- Acres of Farmland
- Multi Family Housing Units
- Housing Units around 1 mile of transit
- Acres of land devoted to renewable energy production
- Acres of development on brownfield or infill sites
- Miles of public transportation
- Total regional VMT

The goal is to balance the opportunities of the rural/suburban areas with the urban ones. For example, we don't want increased density in rural areas, but rural areas can help the region reach its farmland, tree canopy and renewable energy targets. We want to encourage renewable energy generation, but it doesn't make sense to install it on urban land where residential living has significantly lower carbon per capita compared to suburban living.

Each goal is worth a fraction of a greenhouse gas credit (to be determined by consultant). For example, 1 acre of new tree canopy could be worth .5 GHG credits. 1 GHG credit reduces the annual fee by \$1,000. Therefore a jurisdiction that adds 10 acres of new tree canopy gets 5 GHG credits and reduces the amount they pay to the GHG fund by \$5,000. The GHG credit fraction should be set such that the burden for achieving these goals is equally shared among rural and urban communities.

Comment 2: Add new Land Use Strategy

L-8 Regional Land Use/Housing Targets

- o Set targets for type of new housing in the region. Peter Calthorpe recommends that within a region, new growth that is sustainable should be 10% single family, 35% attached single family, 55% multifamily.

Shane Farthing, WABA

WABA strongly supports meaningful steps to reduce greenhouse gas emissions in the region--starting with the transportation sector.

While WABA supports the concepts of congestion mitigation and safety, we are concerned that Strategy T-6 overemphasizes the cost-effectiveness of improvements in a way that will limit opportunities for meaningful steps effective in addressing the concern at the appropriate scale.

We support MDE's request that the regional transportation plan set concrete targets for GHG reductions, and that development plans include a calculation of GHG emissions. These are reasonable steps, necessary to setting a framework for solving this problem.

To fully understand the scope of action necessary, COG should model a scenario that reaches 80% by 2050 so that all jurisdictions can understand the level of effort necessary to progress. Only once they understand the extent of the problem and the scope of the solution can local governments judge their willingness to play an appropriate role.

There is much that can and should be done for the transportation sector to reduce its emissions using local, regional, and state land use and development policy including smart growth, TOD, parking pricing, and shifts to transit, biking, and walking. But the problem is regional, and COG must do the modeling and provide the framework for a meaningful solution.

Ron Burns, Frederick County

1. L-3: Suggested adding bullet for more job opportunities in bedroom communities and I might add: exurban satellite cities (namely Frederick and Waldorf). This brings the strategy I suggested, which did not make the cut by the consultants, to reduce VMT through jobs that create intervening opportunities thus reducing journey to work distance and increasing off-peak direction travel on radial arterials.
2. L-5: In addition to adequate retail levels within activity centers, the retail must be located strategically within centers. Examples: In the Parole town center, near Annapolis, and the FSK Mall Activity Center in Frederick, the most congested hour is lunchtime when all the employees drive from one end of the activity center to the other on retail errands or to eat. May be tough to model but a worthy small addition to the strategy
3. T-10: As mentioned at the meeting, remove the term “limit” after speed and refer to top freeway speeds as the target of reduction in the title. The intent is to reduce top speeds on freeways, not the politically posted limits. Should add congestion as a co-benefit as capacity is enhanced with maximum throughput when speeds are more uniform and in the 50 to 60 mph range where headways are at their minimum. If there is insistence on keeping speed limit reduction, even as a bullet under the overall strategy, I must insist on removing safety as a co-benefit as safety suffers more when range of speed increases (there was a predicted and actual reduction in freeway crashes when the national 55 mph limit was removed).
4. T-12: suggested bullets
 - Eliminate missing links in networks
 - Increased emphasis on Safe Routes to School
 - Increased improvements to transit access/minimize drive to transit lots
5. T-13,14: Please add BOS as a strategy, which improves quality (reliability, travel time) and increases numbers of users
6. T-16: Suggest adding – free parking for HOV4 and vanpools
7. T-18: I reserve the right to be ignorant, but how does a VMT tax reduce greenhouse gasses? VMT is blind to vehicle type whereas a tax rate per gallon purchased is progressive and rewards efficient vehicles; point being that the gas tax is so much more effective than a VMT tax and if we add a VMT tax we would be less likely to increase a gas tax, thus a net increase in GHG

Thanks for these considerations.

Noel Kaplan, Individual

[Email to Paul and Greg: At Friday's meeting, you requested comments on the draft Land Use and Transportation strategy documents by COB today. I thought it would be better to send these to you informally rather than send them in as "official" comments through the public comment site, as these reflect my thinking with only some coordination with others on county staff—submission through the public comments site might suggest a higher level of county endorsement rather than the "thinking out loud" that this represents. If you need to attribute these comments as you compile them, feel free. Otherwise, I'm comfortable having these considered without attribution.]

- Per the discussion at the March 13 Energy/Built Environment subgroup, the concept of developing regional guidelines for EV-readiness in site designs for residential and commercial development should remain a potential implementation action for strategy T-1 (Improve fuel economy of light-duty vehicle fleet).
- The first-cut prioritization document identifies urban tree canopy as a "somewhat promising" concept. I think that this is OK as long as the concept will be carried forward for evaluation—I don't think that this one should be eliminated from consideration in the analysis, particularly in light of all of the co-benefits of this strategy.
- I question why, per COG's handout, the "Increasing fuel taxes/carbon tax" item is seen as being "less promising" while "road pricing/congestion pricing" is considered to be "most promising." I would anticipate that either idea would generate political opposition, and I don't see how a fuel tax increase would be any more objectionable politically to increased tolling on our roads (although a carbon tax might be). Electric vehicles are an interesting consideration here as well. While a gas tax might inappropriately reduce the burden for EV drivers (given that EVs will not truly be zero-emission vehicles until the source fuels for our electrical system will be non-emitting), it would serve to incentivize EVs, consistent with strategy T-1. Road pricing/congestion pricing would not do this. The carbon tax would seem to me to be the most equitable approach, recognizing that it might not be popular politically.
- The April 9 memorandum from ICF presents strategy L-6 as "Focus Government employment near premium transit" while the preliminary qualitative assessment (also dated April 9) presents it as "Require all new or relocated government employment (federal, state, county) to be in proximity of premium transit." There should be a consistent approach to the presentation of this strategy. If the more aggressive "require" language is to be used, there should be some consideration of those circumstances where service-oriented government facilities may need to be located away from premium transit opportunities simply because the communities these facilities would serve would not be located near such opportunities.

Stuart Whitaker, Individual

I commend the Metropolitan Washington Council of Governments (MWCOG) for charging the "Multi-Sector Working Group" with developing a draft list of regional greenhouse gas reduction strategies. Please accept these comments on the Greenhouse Gas reduction strategies that have been identified.

I think it is important to bear in mind that forecasts of the future are only projections. None of us know for certain what will occur, so excessive precision and confidence should be avoided, particularly concerning events further out in time. Likewise, judgment should be applied to projections to ensure that they make sense and are consistent with our understanding of behavior, economics, and other matters.

My comments address both substantive matters and technical digital communications matters.

Substantive Matters

- L-3: Improve regional jobs / housing balance: considerable research has been conducted on this question (for instance, Giuliano). Better transportation is a key element of the solution to this issue. It is unclear whether greater "balance" would be an effective strategy.

- L-6: Focus Government employment near premium transit: Federal employers may be "mainly" on board, but significant resistance remains, for example, the NIH.

The Washington metropolitan area has become increasingly segregated, and transit service is segregated both racially and economically. WMATA reports that 55% of rail passengers are white, while only 25% of bus passengers are white. Assuming that "Metro" in the strategy table refers to Metrorail rather than to WMATA as a whole, locating employment near "Metro, commuter rail, LRT / BRT" may have a disparate and adverse impact on racial minorities and lower income individuals. I recommend that government employment be located near "premium" transit where premium is independent of whether such transit is on steel wheels or rubber tires. Beyond simply locating employment near premium transit, consideration also should be given to government agencies holding office hours at times when premium transit is available, and holding meetings in locations where premium transit is available and at times that premium transit transit is available.

T-6: Roadway bottleneck relief / targeted capacity enhancements: I consider estimates that this will reduce CO2 by any significant amount to be inconsistent with behavioral economics. Long-term elasticities of demand are close to 1.0 for travel time so that an increase in speed from a reduction in congestion will have a corresponding increase in distance traveled, producing no reduction in emissions and, what's more, potentially inducing individuals to shift from lower-emitting travel modes to higher-emitting single occupancy vehicles. I see no merit in the suggestion that because of the high level of congestion in the Washington, DC, area, that this strategy would have an increased value. In fact, I think the opposite -- the high level of congestion will provide a greater inducement for individuals to reduce their travel time and to use alternate modes of transportation.

This strategy illustrates problem with the qualitative scale that is being used in this table. This scale -- Low, Medium, High -- implies that every strategy has at least some low reduction capability, but in fact some strategies may increase emissions. A more accurate and useful scale would be Negative, Neutral, Positive. I would assign T-6 a Negative reduction value.

T-13: Enhance Transit Services: I support the strategies identified and would add "increased schedule coordination" between separate transit agencies to the list. Metrics evaluating transit versus private automobile should be employed.

As for the financial figures provided, figures are only as good as they are accurate, and though I have not reviewed the MD CAP report, I have found that transportation financial information is often inaccurate, misleading, or unusable. For example, the use of year of expenditure (YEO) figures makes a \$1 B investment in 2015 the equivalent of a \$1 B investment in 2050, which is completely misleading. I have seen discounted cash flow calculations that are completely wrong, apparently the result of being prepared by individuals who are inadequately trained. I support use of Cost Benefit Analysis. I have also seen examples where jurisdictions have selected transit solutions that cost as much as five times more than alternative solutions that serve the same capacity. Such choices threaten the credibility and usefulness of such estimates.

T-15: Park-and-ride and HOV investments: I think "somewhat limited potential in DC region" is an excellent assessment, in particular as mentioned, due to the encouragement of longer commutes. On the other hand, better HOV Enforcement is an excellent strategy. For example, Virginia estimates that 35% of I66 eastbound and 50% of westbound commuters are HOV violators.

T-17: Travel demand management: success is heavily dependent on the quality of transit. While often a distinction is drawn is simply between locations served by "rail" versus "bus," more accurate transit service metrics should be employed.

Technical Digital Communication Issues

Work of this group should be more digital friendly.

For example, the April 9, 2015 memo, "Proposed Transportation and Land Use Subgroup Strategies," is in a .pdf format that cannot be copied and therefore cannot be easily referenced. Documents should be searchable and able to be copied.

Also, recent news from Google is that it will prioritize web search results for those pages that are mobile friendly, and organizations that want their information to be accessible and accessed should modify their sites accordingly. Various tables

(http://www.mwcog.org/about/public/documents/MSWG_QualitativeEvaluationTable_LandUse_DRAFT_2015-04-09.pdf and

http://www.mwcog.org/about/public/documents/MSWG_QualitativeEvaluationTable_Transportation_DR_AFT_2015-04-09.pdf) do not lend themselves to reading on a desktop, much less a mobile device.

Tim Stevens, Individual

I favor strategies for the region leading to significant greenhouse gas reductions. Major development projects, including road projects, should include estimates of greenhouse gas emissions. Approval of these projects should acknowledge the effect of the project on regional greenhouse gas emission targets. Projects with low greenhouse gas emissions should receive encouragement. Projects that run counter to the regional goals should be discouraged and opposed. COG has adopted a regional goal for 80% reduction in greenhouse gas emissions by 2050. All sectors need to participate in the efforts to achieve this goal, including transportation.

More emphasis needs to be given to smart growth, TOD, parking pricing, and shifts in investment to transit, local street networks, and improvements in structures for walking and biking.

Rachel Healy, Washington Metropolitan Area Transit Authority

General comments:

The performance management strategy - setting performance goals and targets in addition to establishing regular detailed reporting requirements – is proven effective across industries. It promotes quality analysis and transparency and should be recognized and included as an overarching strategy in this document. A healthy discussion about what goals and/or targets might be appropriate does not undermine the essential fact that performance management is a very valid and potent strategy.

Several strategies should either be bundled (impacts considered together) or combined/merged into one.

When strategy costs are considered it is essential not to over focus on the costs to fund a program or to build infrastructure – it is essential to fully consider the lifecycle costs of that investment. (e.g., a strategy to promote TOD has incentive and administrative costs as well as increased tax revenue and reduced road infrastructure maintenance costs, healthcare costs, household travel expenditures, electricity and water infrastructure costs and school transportation costs.) Conveying the actual costs and benefits of strategically bundled strategies will be key to their acceptance.

Strategy specific comments:

L-1 “Bundle” with L-4 to promote active green streets/transit.

Include targeting indigenous species in the description.

Specify deployment to effect/target urban heat island

L-2 Table comments

Combine L-2 and L-5 (and possibly L-4). – Increase proportion and balance of new housing, neighborhood retail, schools, childcare, libraries, and jobs in transit served walkable regional activity centers.

Reduction potential - If combined potential is H not L-H

(Rachel Healy, Washington Metropolitan Area Transit Authority, continued)

Costs – include savings to residents in time, travel costs, healthcare costs.

Please reach out to Metro/Wmata to discuss findings from recent scenario planning.
rhealy@wmata.com and adavis5@wmata.com

Strategy list edits-

Replace “development in regional activity centers” with “investment in transit served to regional activity centers”.

Replace “Build near transit” with “Grow near existing transit”

Replace “Maximum shift to RACs” with “Maximum shift to RACs with existing transit”

L-3 Incentivize jobs in eastern region.

L-4 Combine or bundle with L-2 and L-5

Emphasize transit served activity centers

This is not just streetscape – it is connections with bus and rail transit as well. Check out/reference our pedestrian walkshed work on PlanItMetro.

Include accessible bus stops, bus shelters, etc.

L-5 See comments on L-2

L-6 Include argument that facilities pay to provide/maintain parking or to locate in TOD. BRAC comment is distracting and I am not certain it is relevant.

T-1 Make sure to sufficiently emphasize infrastructure investment support. (Oregon's example is interesting)

T-2 I assume this includes transit vehicles.

Include electric as well as CNG in analysis if moving forward.

As the region considers significant increase in BRT emissions reduction from electric combined with impact on communities and streetscape of virtually silent and vibration free transit the impact could be larger than initially indicated.

T-6/7 Too focused on pavement to positively affect system and operational efficiency

Improvements to (expansion of) dedicated transit ways/bus lanes, complete streets and designing to load and function should all be referenced in this section as they positively affect system and operational efficiency

T-12 Combine or bundle with L-2, 4 +5

(Rachel Healy, Washington Metropolitan Area Transit Authority, continued)

III These strategies, like pricing, increase operational efficiency and may incentivize use of more fuel efficient vehicles (via car sharing etc.). I highly suggest separating out the pricing items if this series of classifications continues.

T-13 Include system of dedicated bus lanes
Bus lane infrastructure commitments

T-14 This strategy should move under pricing
Include additional consistent funding for transit that allows for reduction in fares.

T-16 This strategy primarily should move under pricing
Parking pricing on and off street

T-17 Several elements in this strategy primarily should move under pricing.

James McGarry, Chesapeake Climate Action Network

Thank you for the opportunity to comment on COG's list of potential Greenhouse Gas Reduction Strategies. The strategies identified in these documents are an important first step towards achieving Maryland's long term greenhouse gas (GHG) reduction goal of 90% below 2006 levels by 2020.

In particular, we support the measure described in strategy EBE-7 that recommends increasing the state's RPS to 40%. However, we recommend that the target date for a 40% RPS should be 2025 rather than 2030. The "Draft Energy & Built Environment Qualitative Evaluation Table" acknowledges that the "MD RPS is currently 20% by 2022, could be upped to 40% by 2025." We agree with that assessment. Maryland's Greenhouse Gas Reduction Plan lays out a 25% by 2020 RPS as its top greenhouse gas reduction measure. Reaching the achievable 25%-by-2020 clean electricity goal recommended by the state's Plan will lead Maryland's RPS to grow by 4.0% per year if the ramp-up begins in 2018. The targets would necessarily have to start increasing a few years after legislation is passed to give markets time to adjust to the new goals. Maryland could then actually decrease that growth rate to 3.0% per year after 2020, to also hit a robust 40% by 2025 RPS.

We strongly support a 40% RPS, but we recommend that that EBE-7 be revised so that the goal is 40% by 2025, and so that there's an interim goal of 25% by 2020.

We also support the requests that have been made by other groups that there should be a requirement that the regional transportation plan set targets for GHG reduction, and that there should also be a requirement that development project reviews include calculations of GHG emissions. All sectors of Maryland's economy will have to make deep cuts in future GHG emissions to meet the state's long term reduction goals. Achieving those cuts requires long-term planning, particularly within the transportation sector where funding decisions are made over long time horizons.

Setting transportation emission targets now and modeling the scenarios that would be necessary to achieve those targets would help to guide policymakers and other stakeholders who would like to know what is needed to achieve the state's goals.

Thank you for COG's work developing these strategies and for offering us this opportunity to comment. We would like to work with COG moving forward to help refine and implement these recommendations.

Lorena Rios, Individual

I am in agreements with most of the proposed strategies as a starting point to address Greenhouse reductions. Every action has a reaction so when trying to implement some of these proposed measures, we must be careful not to be creating a bigger problem. T-10 is a bad, short sighted and illogical suggestion

T-10: Lower speed limits Lower speed limits on freeways and included GHG surcharge as part of enforcement.

I find this “strategy” to be extremely counterproductive. We have all experienced driving in Washington DC in the middle of the day and moving at 10 miles an hour; or driving in Northern Virginia on Rt.7 or Rt. 50 West no faster than 20 miles an hour at times. Why would anyone, in their right mind, want to intentionally create more traffic congestion than we already have? I can only imagine who ever came up with such a brilliant “strategy” does not know or understand the meaning of road rage. In my opinion, solving transportation problems using this absurd approach is one of the reason we have some many transportation problems. Slowing drivers down through cameras and human incompetence is not the way to reduce Greenhouse gases. Following that faulty logic, if we forbid everyone to drive, we can bring carbon monoxide emissions to zero in no time.

Instead, we should work on strategies to keep traffic flowing efficiently and smoothly, combined with technologies as a good starting point. Currently, there are some states legislating so passing lanes are used to pass so traffic can flow better. And we, in this area, want to lower speed limits as a solution? I hope I misunderstood the intention of this “strategy” or lack thereof.

<http://chronicle.augusta.com/news/government/2014-02-26/georgia-legislation-targets-slow-pokedrivers-left-lane>

Air and Climate Public Advisory Committee

Draft Meeting Minutes for Item 3: Greenhouse Gas Emission Reduction Strategy Work Session
Monday, April 20, 2015

Item 3. Greenhouse Gas Emission Reduction Strategy Work Session

Over the last several years COG and its members have been working diligently toward the regional greenhouse gas emission reduction goals: 10% by 2012, 20% by 2020, and 80% by 2050 (below 2005 levels). The draft regional inventory for 2012 shows the region has met the 2012 goal. The Multi-Sector Greenhouse Gas Work Group (MSWG) is working toward developing a “What We Can Do Report” to help the region meet the future regional goals.

The MSWG has developed a list of draft strategies that is open for public comment through April 22, 2015. The strategies will be narrowed down and analyzed by consultants to inform the report. To provide input on the strategies and what the consultants analyze ACPAC members were broken out into 3 tables each with a separate focus sector: energy and environment, transportation and land use. Each table was asked to provide their top 3 priority actions, least 3 priorities and asked what was strategies were missing. A summary of the discussion at each break out session is as follows:

Energy and Built Environment:

Top Priorities	Bottom Priorities
1. Building efficiency for new and existing buildings	1. Education
2. Energy source/supply	2. Non-road engines
3. Resource recovery and management	3. Public/private infrastructure

The majority of this group felt education could be integrated into all of the strategies; one member felt that education was a top priority. Members thought that the Location Efficiency strategy should be covered in the Land Use sector. Overall members of this group agreed that public/private infrastructure was important but not as important as others on the list for the specific purpose of reducing GHG emissions. Electric car infrastructure was one strategy identified as missing from the list. Several group members noted that Energy source/supply should consider how to implement the targets in Virginia.

Transportation:

Top Priorities	Bottom Priorities
1. T-13: Enhance transit services	1. T-10: Lower speed limits
2. T-12: Enhance the bicycle/pedestrian environment	2. T-15: Park and Ride and HOV investments
3. T-18: Road pricing/congestion pricing	3. T-4: Lower emission off-road construction vehicles
4. T-21: Increasing fuel/carbon tax	

Missing from T-17 was optimizing travel demand through operations and from T-21 is missing the inclusion of equity considerations.

Land Use:

Top Priorities	Bottom Priorities
Tree canopy	None identified
Walkability	
Jobs/housing balance	

The strategies weren't grouped in a manner that was easily understood. One suggestion was to combine strategies L-2, L-3, L-5, and maybe even L-6 since they all relate to the jobs/housing balance. Also, the concept of Activity Center weren't readily understood. Transportation corridors connecting activity centers should not be ignored and should be a focus for density and development and to support alternative transportation initiatives such as bus rapid transit. Implementation actions should include incentives for people to live near where they work.

It was also noticed that Land Use strategies were far less in number than the other sectors and consideration should be put into adding additional strategies. It was specifically noted that strategies for the "land" were missing from the Land Use sector (suggested strategy L7). Sustainable landscaping and land management supports soil and forest carbon sequestration and energy efficiency from reduced water use and reduced wastewater treatment needs while increasing biodiversity and providing pollinator habitat. These strategies include reducing impervious pavements, decreasing water intensive plantings, and reducing nitrogen, phosphorus, and sediment pollution loads entering streams and increasing stream bank restorations (which in turn requires less advanced treatment of water at energy-intensive treatment plants). It was suggested that we should not ignore the "land" and the energy-water nexus. It was suggested that this sector of strategies be renamed to Land Use/Water strategies.

Recap and Next Steps:

A general comment that ACPAC members had was that the highest common denominator (not the lowest) should set the bar for all the strategies.

Additional ACPAC Member Comments Submitted

ACPAC member Maggie Shober – Additional Energy & Built Environment comments

- EBE-1 Include demand response programs
- EBE-3 Create a common regulation/evaluation for defining 'net zero' across the COG region
- EBE-5 Net Zero and 'off grid' are very different; define
- EBE-6 Streetlights can have a major impact but most utilities/municipalities don't own them
- EBE-7 Include demand response programs and Combined Heat and Power
- EBE-8 Add action to first measure leaks since there is not currently good data
- EBE-9 Waste to energy plants could include combined heat and power

ACPAC member Gabriel Thoumi – Additional Land Use comments

I would like to follow up and suggest we add to this document:

<http://www.mwcog.org/uploads/committee-documents/Y11WWltY20150417092325.pdf> a category called “L-7: Sustainable land-use”.

This category would include the following property types:

- Public (national, state, regional, municipal)
- Private

In this strategy “L-7: Sustainable land-use”, we need to include (based on <http://www.climate-standards.org/> and <http://www.v-c-s.org/> and my previous consultancy designing sustainable climate smart landscapes to decrease emissions from 2006-2013):

- H2O: Improving the hydrological cycle (input, output, recycling water)
 - MS4 permitting
 - Storm water, rainwater retention onsite, etc.
 - Decreasing imperviousness
 - Increasing perviousness
- Soils: Improving soil structure via stream bank and ecosystem restoration
 - Yields decreasing sediment loads with MS4 permitting positive results
 - Decreasing nitrogen and phosphorus use (fertilizers, etc. which have high GWP mtCO₂e emissions potentials)
 - Improving organic composting onsite which decreases CH₄ emissions from land-fills
- Sustainable landscapes:
 - Decreasing water intensive landscapes
 - Increasing drought resistant landscapes
 - Increasing native species composition regionally
 - Increasing pollinators which improve condition of urban forests making them more “resilient” (pollinators are like probiotics for ecosystems!)
 - Increasing “dark skies compliant” skyline