

## 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

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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.**

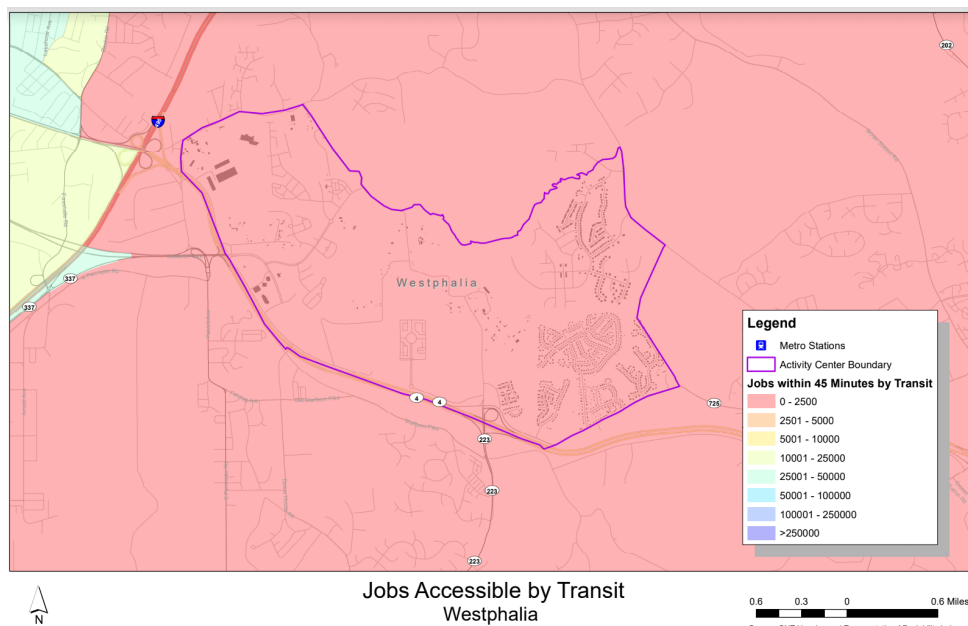
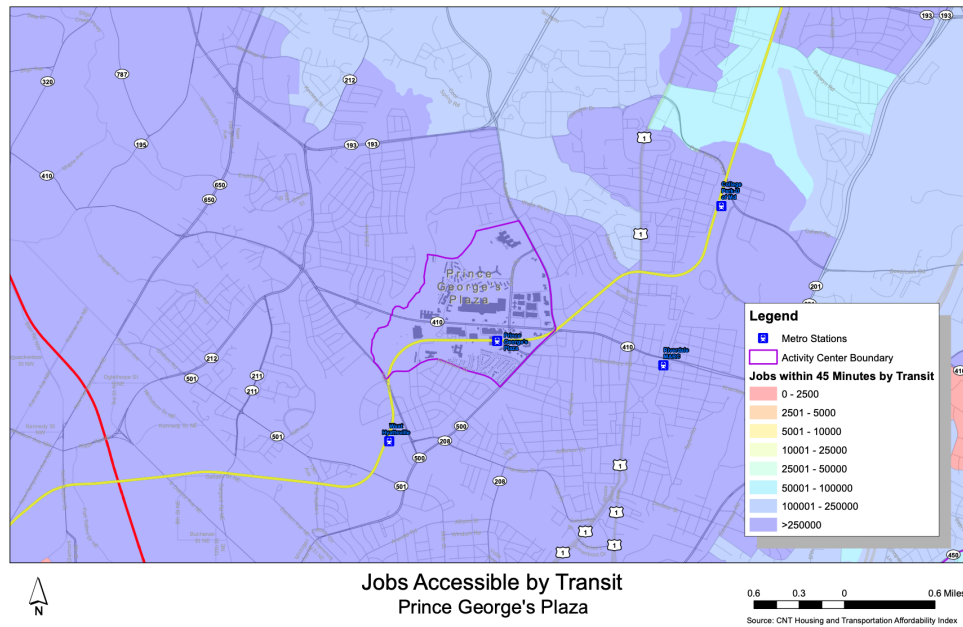
- Page 75 lists several good ideas to improve transit, walking and biking, but the plan provides no steps to implement these on pages 77-78 or in Chapter VIII Priority Recommendations.
- The plan is silent on the billions of dollars planned in highway and roadway expansion in the County, most of which 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 CO<sub>2</sub> 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 goals<sup>1</sup> 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,<sup>2</sup> 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.

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

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



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:

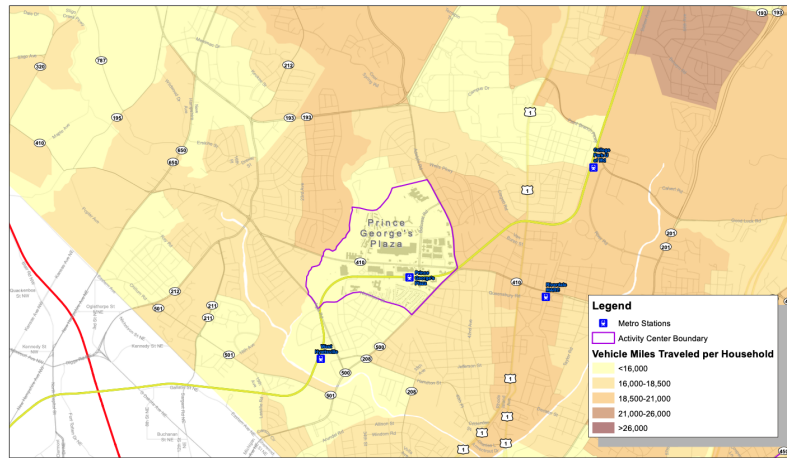
- People who participated in community meetings were either not notified of the draft plan release or received an email 8 days into the public comment period.
- County maintained four parallel websites with inconsistent content. Various County notices directed the public to one of four websites for information 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.

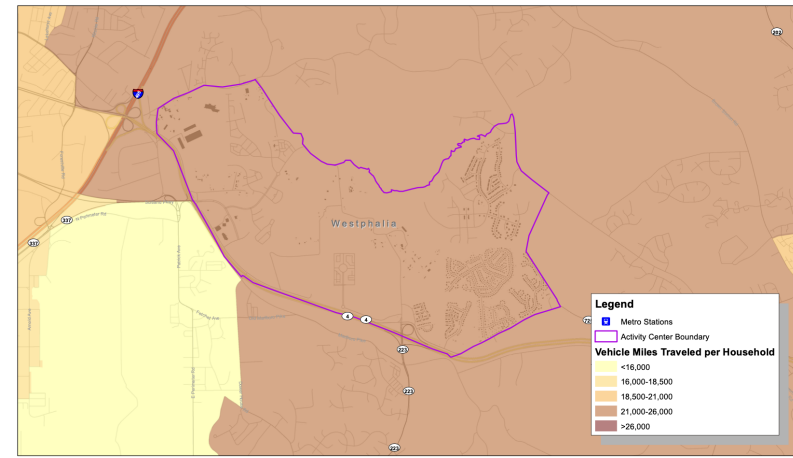
- C. Define up front for reader what the terms resilient/resilience/resiliency mean in this document. Use of this term sometimes refers to disaster response and recovery, sometimes to climate change adaptation, and sometimes to greenhouse gas mitigation.
- D. “Co-Benefits” concept needs to be explained 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



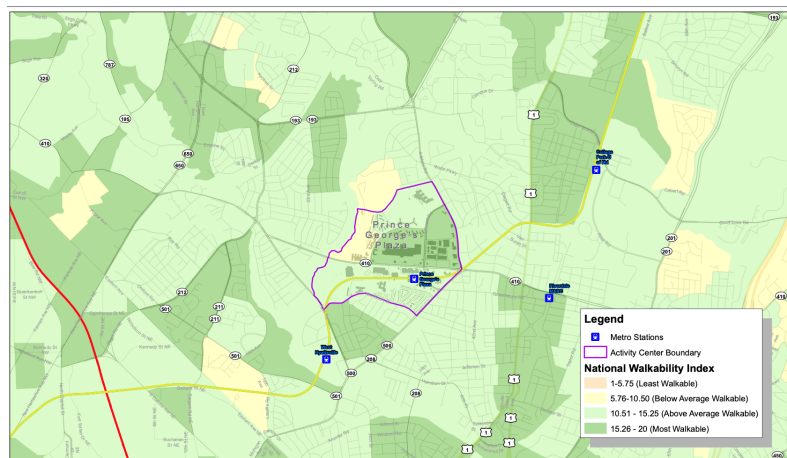
VMT per Household  
Prince George's Plaza

Source: CNT Housing and Transportation Affordability Index



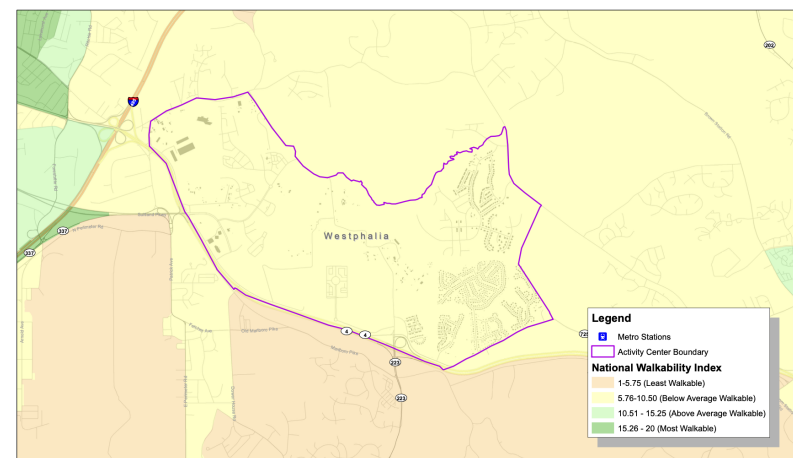
VMT per Household  
Westphalia

Source: CNT Housing and Transportation Affordability Index



Walkability Index  
Prince George's Plaza

Source: US EPA National Walkability Index



Walkability Index  
Westphalia

Source: US EPA National Walkability Index