

From: [Grace Hodges](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Sunday, April 05, 2020 8:38:48 PM

Council Members,

First of all, thank you for your the draft Montana Climate Solutions plan.

A few comments:

Recommendations 1A through 1H should be funded and acted upon as soon as possible. Recommendations 2A through 2E and 2G through 2K are also essential.

We need a statewide energy efficiency standard, and the size cap on rooftop solar should be raised.


Montana should adopt low emission vehicle standards and incentives for electric vehicles.

Carbon capture and sequestration only makes dirty, expensive coal plants even more expensive and risky. The final recommendations should focus on reducing reliance on coal-fired electricity.

Thank you,

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Grace Hodges


Helena, MT

From: [sandra kempa](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Monday, April 06, 2020 1:19:59 PM

Council Members,

Thank you for your efforts in producing the draft Montana Climate Solutions plan. In addition to the specific comments below, please make it a priority that implementation begin immediately for those measures which can begin right away and that will help reduce greenhouse gas emissions.

-- Please support efforts to expand Montana's ability to understand climate risks and prepare for change. In particular, recommendations 1A through 1H should be funded and acted upon.

-- Montana needs more accessible climate science. Please support a larger Montana Climate Office with more staff, stronger Montana University System climate coordination, research and funding, and increased support from the state to communities so they can develop greenhouse gas reduction and climate adaptation strategies.

-- Recommendations 2A through 2E and 2G through 2K are essential for Montana to reduce greenhouse gas emissions and avoid locking into new fossil fuel infrastructure. Montana is deficient in programs and funding to support energy efficiency and conservation and the key strategies identified, if enacted swiftly and with financial support, are essential. They will save Montanans money while improving public health.

-- A statewide energy efficiency standard would save all Montanans money.

-- Raising the size cap on distributed generation solar systems (aka rooftop solar) would benefit schools, libraries, and other public buildings in their community - saving taxpayer dollars and creating educational opportunities for our youth.

-- Support adoption of low emission vehicle standards and actions that will incentivize/promote/enhance electric vehicles.

-- Please encourage and support community goal setting, energy data collection across sectors, and planning efforts to reduce emissions and save money in local communities.

-- Voluntary controls on oil and gas development are inappropriate. The industry has had decades to voluntarily curb greenhouse gas emissions and has failed to do so. Methane emissions from oil and gas development are easily controlled and should be required. The time has past for voluntary commitments from this greenhouse gas producing sector.

-- Carbon capture and sequestration is not an appropriate climate solution for coal-fired electricity. This unproven technology only makes dirty, expensive coal plants even more expensive and risky. The final recommendations should focus on reducing reliance on coal-fired electricity instead of relying on misguided, expensive, risky, and unproven technology.

Thank you,

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sandra kempa



Black Eagle, Montana

From: [Stephen Smith](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments to Climate Solutions Council
Date: Monday, April 06, 2020 11:42:28 AM

Climate Solutions Council members:

While I am a conservative, I agree that climate change is a serious threat to our society and is largely caused by human activity. Thus, I support efforts to limit and reduce GHG emissions, but seek those that are most cost effective and that encourage our capitalistic economic system to develop the technologies needed for a sustainable future. Further, I do expect efforts to limit GHG emissions globally to be insufficient such that warming will continue. Montana, and especially Helena, represents a very small part of the global system. We have almost no control over global emissions, but we can adapt and prepare for what is likely to come. My following comments are based on this philosophy.

The following comments are numbered to match the Council recommendations.

1A: We do not need a larger bureaucracy. Do not expand staff of the Climate Office.

1D: Local government can encourage planning for future solar power implementation. In particular, placing housing and other buildings so that south facing sloped roofs are maximized. While photovoltaic power with battery backup is not yet economical, it is likely to become so in the near future. This capacity could efficiently be added to building that already have appropriate construction. Housing is already being rated for “Sun Number” by Zillow. See <https://www.cleanenergytrust.org/sun-number-teams-zillow-estimate-solar-value/cleanenergytrust.org>.

2-GHG Reduction Strategies

2A-Repeat 1D above. Encourage construction arrangement that will facilitate future solar installation. Also, encourage zoning that minimizes outdoor lighting. In this way, “Dark Skies” will lower electricity usage and allow urban residents to enjoy our Big Starry Sky.

2B-Government required changes of utility management can be counter-productive. Such command and control procedures may result in utilities choosing technologies that are not best long-term for customers.

2H-My comment 1D above supports this. The “Sun Number” concept of rating buildings should be included.

2I-I fully encourage this. As is, our tax structure is penalizing those doing just what we want. It should work the other way.

2J-I agree that utility scale energy storage will be an important part of our future electric grid. However, Montana is such a small part of the U.S. economy that there is very little we can do to cause the economics to change. Technology is now rapidly evolving and such economic storage seems very likely to be available within the next decade. Let’s wait for that to happen and then implement it economically.

2L-Tax incentives for low emission vehicles largely benefit the wealthy at the expense of everyone else. The technologies and infrastructure needed for a low emission transportation system are also rapidly evolving. Let’s wait for this to happen.

2M-Montana is too small to affect this market. If we choose a unpopular technology, we will waste a lot of money. Again, let’s wait.

2N-As with above, let Montana follow instead of lead. Save our money for future needs.

2O-Do not establish any more or new reporting requirements. Montana businesses would be hurt

by more bureaucratic reporting. MDEQ and others may use existing Federal reporting as a basis to evaluate MT emissions.

2P-While MT is small regarding emissions relative to the global or national scale, MT has a lot of coal. Technology that will allow coal use to be both environmentally acceptable and cost effective will be good for MT. The objections that this may be pro-fossil fuel is based on a prejudicial opinion that fossil fuel is bad whether or not the carbon can be limited. I support this proposal.

2Q-I agree that net metering is unfair to utility customers, since it requires the utility to provide backup or battery type service with no return. If net metering fairness can be addressed, then the cap should be raised, since 50 kw is too small for many technologies to be cost effective.

2R-The RPS should be expanded to include energy generated from all forms of biomass, including all organic solid waste.

3A, B, C, D, E, F, and G-These proposals are all supportive of being prepared for whatever the future brings. I support them.

Stephen Smith, P. E.

Phone: [REDACTED]

Cell: [REDACTED]

Email: [REDACTED]

From: [KAREN WEBER](#)
To: [Climate Council](#)
Subject: [EXTERNAL] What about Carbon Capture?
Date: Monday, April 06, 2020 3:00:50 PM

To the Climate Solutions Council,

Please don't retire our coal plant until it's been proven that something can replace it.

As a result of the U.S. Clean Air Act of 1970, coal plants have spent millions of dollars to reduce pollutants Carbon Monoxide and Nitrogen Dioxide.

You can read about these retrofits that have been mandated by law at the:

Institute for energy [research.org](#). Article, "Cleaned-Up Coal and Clean Air: Facts About Air Quality and Coal-Fired Power Plants" November 20, 2017.

Coal Plants were emitting 16 million tons of pollutants per year in 1990. By 2015, pollution was reduced to 3 million tons per year.

Today, coal plants produce 30% of the electric power for grids. This is a constant stream of power that solar and wind can't create. When there are gaps in production brown outs and blackouts occur. Coal power stops the whole grid from failing.

There's a lot of money in energy production. The people who want to close down coal are trying to corner the market in an economic take over at risk to the consumer. And what about carbon capture?

Denise Weber
Miles City, MT

From: [John Woodland](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Monday, April 06, 2020 12:17:20 PM

Council Members,

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Thank you,

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John Woodland


Superior, MT

From: [Chris Borton](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Climate Council feedback/comment
Date: Tuesday, April 07, 2020 3:17:47 PM

Dear Council,

I am writing to let you know I fully support your efforts as you help to promote clean air, water, soil, and energy for our health and state. We must be prepared for greater climate extremes and everything that comes along with it. Montana should be joining the rest of the progressive world that acknowledges the science of climate change. Of particular interest to us is promoting solar energy in all aspects: through the utility, off-grid, battery storage technology, and integration into residential and commercial buildings, as well as electric vehicle charging and vehicle to grid applications. This should be accomplished with solar-friendly incentives, tax-credits, codes, policies and laws.

Thank you,

Christopher Borton

Director
Sage Mountain Center


Whitehall, MT 59759

March 31, 2020

Dear Department of Environmental Quality, Climate Council and Governor,

Thank you for the opportunity to comment on your Draft Montana Climate Solutions Plan. I think it was great to get a group of people to discuss this, but I do not think your recommendations should hold weight over the best available science or comments from other members of the public.

There are many people who do not believe the status quo is the way to proceed. The council is heavily weighted to industry and scarce on scientists and expertise in Climate Change. This concerns me. In one year, you learned as much as you could about the issue and that is admirable, but in that time, you could not possibly have gathered enough knowledge to sift through all the science and come to sound conclusions.

I wonder as I look around at the current lack of fossil fuel burning from the fear of an impending pandemic that will kill six percent of the population. Yet we sit back and watch as the planet warms to unsustainable temperatures in just 20-50 years if that long? There seems to be a disconnect here. According to NASA:

“Over the past 100 years, global temperatures have risen about 1 degree C (1.8 degrees F), with sea level response to that warming totaling about 160 to 210 mm (with about half of that amount occurring since 1993), or about 6 to 8 inches. And the current rate of sea level rise is unprecedented over the past several millennia.” [NASA’s site](#)

It seems global warming and the changes it will bring to our lives will be more deadly than this pandemic that has shut down the economy. Please reconsider your choice to ignore science when you say “sound science and information alone are insufficient to effectively manage climate-related risks.” Please do not sanction business as usual for NorthWestern Energy, extraction industries, logging, and agriculture. These economies are a large part of the problem and NOT the solution. There are alternative energy solutions and alternative economies available, but they will not grow if we continue to support and subsidize the industries that got us here.

I first hope that this plan will hold no more weight than what it is, a form letter from a group of people who have ideas about how to mitigate climate change in the future. In most public comments, letters from one group are considered as one voice.

The best available science and information are the **only way** to effectively manage climate related risks. In the past, when industries died, we let them and those that had vision re-tooled and found new ways to be a part of a changing economy. Now we have government subsidies that bolster dying industries rather than allowing change to happen as it should in a free market system.

I agree we do need to respond “to the needs of government agencies, tribal nations, land managers, business owners, non-profits, and individuals.” The needs of all in the face of climate crisis is to change what we are doing immediately, stop burning fossil fuels, stops burning coal, stop deforestation of our last remaining intact forests, and many other items that are not supported or even mentioned in this document. I find that highly disappointing.

I think statewide building codes that encourage energy efficiency is a great idea (page 9). I think there should also be grant programs and requirements over time to update existing buildings to meet energy efficiency. Rooftop solar should be a part of that code as well. Consider a program that increases electricity rates as use increases, or base it on what would a similar building that is energy efficient use and charge much higher rates on what is used above that level.

Net greenhouse gas neutrality is an essential component. I do not see this as possible with the recommendations that you have made. Promoting solar and wind technology much more than you do in this document might bring us to that lofty goal. Continuing with coal and considering biofuel solutions do not.

Low emission standards for vehicles are incredibly important, but so are increasing mileage standards on all automobiles and trucks and reducing speed limits. These quick measures should be included as well.

Increasing the size for solar generating systems is a great recommendation. Solar energy should be encouraged. You don't even need to subsidize the industry, just stop subsidizing fossil fuels.

There is a discussion to increase rooftop solar rates when rooftop solar is part of the climate solution. Rooftop solar should be rewarded not penalized. Instead an increase equal across all users should be made to offset management costs.

There is no need to pay for social science surveys. A comprehensive educational promotion of true energy solutions is necessary. It should include the reality of the climate impact that the current energy economy creates. It should be similar to the information that is being promoted currently on Covid-19. The message, though difficult, gets across to the public if it is honestly and fervently expressed.

There is no question that coal-fired electricity generation in Montana should be abolished swiftly and permanently, provide job training, and support green energy solutions to diversify changing local economies. Economic diversity will save small communities, not single economies that only continue due to exorbitant government subsidies. That money could be used for the solution not the cause.

Please remove any consideration of biofuels which have been shown to emit more carbon than coal when the entire production and transportation process involved is considered. Look at the science not the propaganda. This is NOT a clean energy solution by any means please study this article about the carbon emitted from biofuels as it compares to coal and fossil fuels.

https://www.pfpi.net/wp-content/uploads/2011/04/PFPI-biomass-carbon-accounting-overview_April.pdf . One section of the article states:

Burning biomass emits more CO₂ than fossil fuels per megawatt energy generated:

1. Wood inherently emits more carbon per Btu than other fuels
 - a. Natural gas: 117.8 lb CO₂/mmbtu
 - b. Bituminous coal: 205.3 lb CO₂/mmbtu
 - c. Wood: 213 lb CO₂/mmbtu (bone dry)
2. Wood is often wet and dirty, which degrades heating value Typical moisture content of wood is 45 – 50%, which means its btu content per pound is about half that of

bone dry wood. Before “useful” energy can be derived from burning wood, some of the wood’s btu’s are required to evaporate all that water.

3. Biomass boilers operate less efficiently than fossil fuel boilers (data from air plant permit reviews and the Energy Information Administration)
 - a. Utility-scale biomass boiler: 24%
 - b. Average efficiency US coal fleet: 33%
 - c. Average gas plant: 43%

I would like this article and all of the other linked articles to be a part of the public record. They were all sent as attachments, but I was told the attachments were too large. Please make the full text of this article a part of the public record.

I am curious about the recommendation that the forest council plan be followed. The plan has not yet been created. This seems a leap of faith. The council plans to log which many studies have shown to produce more atmospheric carbon than almost any other activity, including wildfire (<https://www.nacarbon.org/nacp/documents/WWR%202018%20April%20final.pdf>). Here are a few of their suggestions:

- Simulations show increased net carbon uptake with little change in wildfires by 2100.
- Reforestation, afforestation, lengthened harvest cycles on private lands, and restricting harvest on public lands increase NECB 56% by 2100, with the latter two actions contributing the most.
- Resultant co-benefits of these strategies included improved water availability and biodiversity, primarily from increased forest area, age, and species diversity.
- Converting 127,000 ha of irrigated grass crops to native forests could decrease irrigation demand by 233 billion m³ y⁻¹.
- Utilizing harvest residues for bioenergy production instead of leaving them in forests to decompose increased emissions in the short-term (50 years), reducing mitigation effectiveness.
- Increasing forest carbon on public lands reduced emissions compared with storage in wood products because the residence time is more than twice that of wood products.
- Forest sector emissions tracked with our life cycle assessment model decreased by 17%, partially meeting emissions reduction goals.

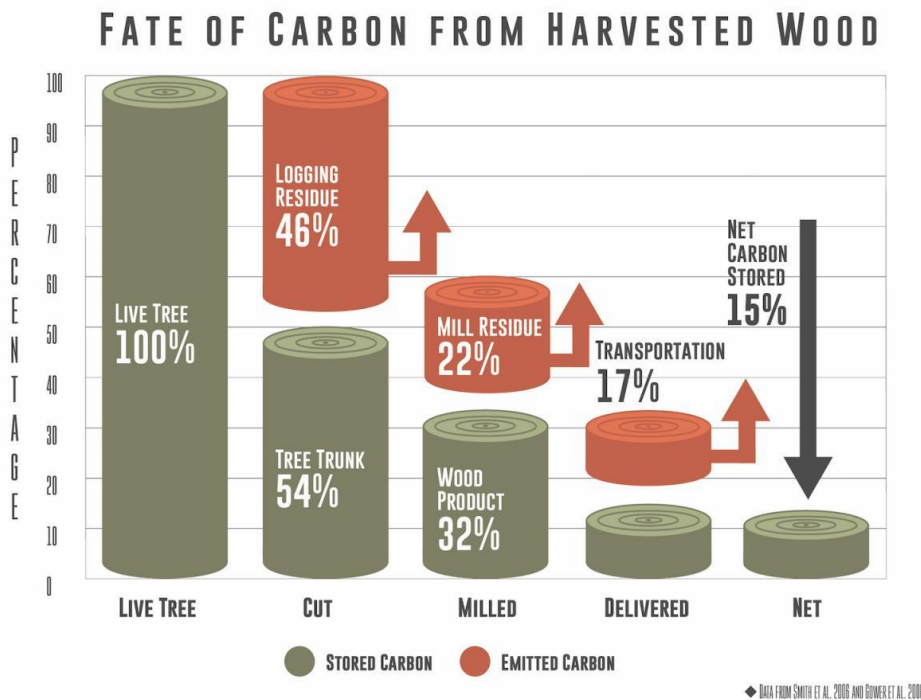
Yet on p. 6, Council recommends implementing “active management across ownership boundaries to reduce wildfire risks and sustain watershed functions as identified in Montana’s updated Forest Action Plan.” Please also consider the science that finds water quality and quantity (see <https://www.anu.edu.au/news/all-news/250000-melbourne-residents-losing-water-due-to-logging>) decrease with logging. Note this article is bolstered by the third bullet in the last quote from Law, BE et al 2018. Certainly logging is not what is necessary to combat climate change.

Instead of reducing logging which would slow the warming climate (see Moomaw et al 2019 <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>), you ask for more logging. It will only exacerbate global warming. Please note the current cost of timber management in our

forests. (please see Environmentally Harmful Subsidies in the US: Issue #1 the federal logging program. <https://sustainable-economy.org/wp-content/uploads/2019/05/CSE-Federal-logging-report-May-2019.pdf>) Certainly that 2 billion could be put to better use in actions that mitigate rather than increase climate warming. A better choice would be to follow the lead of Massachusetts in their action to stop logging altogether (see <https://arstechnica.com/science/2019/11/state-legislation-would-enlist-forests-in-the-battle-against-climate-change/>). That would be a game changing recommendation if you proposed it.

If the council is to recommend forest management, it should be limited to one half mile from structures as supported in Jack Cohen’s work (see <https://www.fs.usda.gov/treearch/pubs/5603>). This would also provide jobs for loggers, not large logging conglomerates. Defensible space work will provide for new jobs and a new economy (see http://nreconomics.com/reports/2018-04-28_EnvNow_Report.pdf). If you are truly worried about jobs for the regular guy and not industry profits, this would be a much more carbon and local economy friendly method.

A better approach would be to promote adaptation to a new climate. And, while producing some wood products will always be a necessity, science makes it clear that their production does not enhance carbon storage. As a matter of fact it emits more carbon than a forest fire. While fire leaves nearly 85% of carbon on the landscape, wood products only preserve about 12% of the carbon from the original log. See chart 1



Please promote measures that allow buyouts of grazing allotments and retirement of irrigation rights to boost streamflow. This will protect fisheries and tourism and reduce fires easily ignited in cheat grass and other invasive plants.

Though carbon capture is a tool, it is not the answer by any means. It encourages the status quo and continued consumption of fossil fuels. While this should be a part of the plan, it should not be considered a long term solution due to the expense and the lack of change.

Though updated information on flood plains and wildfire prone areas is important for local governments as you mention on p 4, that information should be based on the best available science not politics. It would be better to promote strong zoning to prevent houses from damage do to flooding and fire.

Some other thoughts not included in the recommendations are easy things to promote to Montanans as you inform them of what the future will look like if we do not act immediately. Consider removing or reducing subsidies for resource extraction and bolster clean energy solutions, encourage working from home for less commuting, lower the speed limits, demand higher mileage requirements, encourage families to have less children, educate the public on the best available science concerning climate change, eat less meat, eat locally, discourage green lawns, discourage the use of fertilizer, herbicides and pesticides, mow lawns less often, reduce auto trips by combining errands, carpool, and stop purchasing what is unnecessary.

Thanks for considering my comments.

Please make all the attachments a part of the public record.

Michele Dieterich

From: [Mark Sembach](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Keystone XL Pipeline
Date: Tuesday, April 07, 2020 3:02:06 PM

The State needs to withdraw any and all permits for the XL Pipeline. Or, place a \$50 tariff on each barrel of oil transported through the Montana section of the pipeline. Encouraging Canada to process their own dirty and problematic tar sands derived oil. Additionally, the US does not need the additional oil. WE ALL MUST REMEMBER THE OIL IN THE GROUND ISN'T GOING ANYPLACE; ITS NOT GOING TO MAGICALLY DISAPPEAR IF IT IS LEFT IN THE GROUND UNTIL THE WORLD REALLY NEEDS IT OR FINDS A WAY TO MAKE IT LESS TOXIC ON THE ENVIRONMENT!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Best regards,

Mark Sembsach

Mark Sembach, Senior Environmental Consultant
Mobile/ Office

<http://biolynceus.com> [biolynceus.com]

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Providing Environmental Solutions for **Water**, **Soil** and **Plants**

Located in Estes Park, CO

From: [Melissa Smith](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Tuesday, April 07, 2020 12:54:48 PM

Council Members,

Thank you for your efforts in producing the draft Montana Climate Solutions plan. In addition to the specific comments below, please make it a priority that implementation begin immediately for those measures which can begin right away and that will help reduce greenhouse gas emissions.

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Thank you,

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Melissa Smith



Great Falls, MT

From: [Angel Serafin](#)
To: [Bullock, Governor](#)
Cc:



Subject: [EXTERNAL] Thank you
Date: Wednesday, April 08, 2020 10:33:44 AM

Good afternoon – I know the COVID-19 emails are endless, but I wanted to send a quick note to say thank you for your service. I appreciate all you and your team are doing. During this pandemic, I ask that you and your team review the stopping KeyStone XL Construction until things improve. Workers are coming from many different risk areas and we need to keep these workers safe. Thank you again!

Notice: We are independent advocates fighting to improve our community and are **NOT** affiliated with an official organization, lobbying firm, or company. Correspondence relates purely to community service projects and issues impacting our community.

From: [John Oetinger](#)
To: [Climate Council](#)
Subject: [EXTERNAL] public comment in support of Montana's Climate Solutions Draft Plan
Date: Thursday, April 09, 2020 7:04:04 PM

We installed solar panels on our house last summer, so that should tell you where we stand, but in case there's any doubt, we support any and all efforts to encourage renewable energy solutions, including but not limited to tax credits and net metering.

Thanks for all your efforts!

John and Becky Oetinger

[REDACTED]

Missoula MT, 59802, USA

[REDACTED]

[REDACTED]

From: [Heidi Harting-Rex](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Friday, April 10, 2020 2:22:46 PM

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Thank you,

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Heidi Harting-Rex


Helena, MT

From: [Kit Tilly](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Montana climate solutions
Date: Saturday, April 11, 2020 10:12:27 AM
Attachments: [Montana climate solutions.docx](#)

Hi,
I attach my comment on the draft Montana Climate Solutions.
Kathryn Tilly

To the Montana Climate Solutions Council:

I am a Ravalli County resident who is writing to congratulate the Council for beginning to address the crisis of climate change in the state of Montana. The draft Montana Climate Solutions Plan is a good start, but does not go far enough in addressing this problem. I believe that the state should undertake a more ambitious path and I provide specific comments below.

1. An over-arching comment of mine is that all recommendations should be science-based. Although I realize that economic, social, and cultural considerations can affect what is possible at any given time, global warming is a problem that can only be solved, or even addressed, by action now, so all goals should be scaled to fit the problem.
2. On p. 7, Section 1F. We should not only recognize Montana producers for their high adoption rates of soil health practices, but should also encourage and provide incentives for more producers to adopt those practices.
3. P. 8, Section 1G. Among strategies to support climate resilient lands, the State (or NGOs) should buy up grazing permits, to retire low productivity lands and allow them to recover from grazing. Likewise, planting cover crops to improve degraded agricultural lands should be encouraged with incentives. Under strategies for waterways, the State should define wetlands with the broad definition previously used by the EPA under the Clean Water Act. All wetlands, whether or not they have an outlet, help to clean and replenish our groundwater, beside providing habitat for birds and other struggling species. Also, the State should “provide for aquatic organism passage where possible,” not just where “appropriate.”
4. In response to questions on p. 9. Tax dollars should be used to fund climate-related activities. Increasing fuel taxes, which would also reduce driving and related emissions, would be a possible source of tax revenue. Open and frequent lines of communication will be crucial to effective action. It will be important to develop estimates of the benefits of proactive climate adaptation, as these are often not factored into decisions regarding policies and actions. Finally, as I said above, decision-making should be science-based, within the bounds of what is feasible. Cultural, economic, and social boundaries should be continually subject to discussion and pushback, in order to carry out as dramatic action as possible.
5. Section 2. While I applaud the goals stated on p. 9, I think they need to be more ambitious, in order to have the appropriate impact on climate change. I suggest striving for net greenhouse gas neutrality by 2030.
6. P. 12, Section 2A. There should be incentives for owners of existing homes and buildings to retrofit those structures for greater energy efficiency— replacing windows, adding insulation, updating heating and cooling systems, improving fixtures and appliances. These could be tax incentives and/or credits.

7. P. 13. The schedule for adopting a new energy efficiency standard should be accelerated. Also, the proposal “should” consider specifying some amount of energy efficiency acquisition targeted at low income Montanans.
8. Section 2C. Strategy 1– the State should require the adoption of on-bill financing.
9. P. 16, Section 2G. The State should “make permanent’ the property tax holiday for community solar energy development.
10. P. 18. The PSC needs to require more utility scale renewable energy, in addition to hydropower.
11. P. 19, Section 2M. The State should provide incentives for towns on Highways 93, 200, and 2 to install electric vehicle charging stations.
12. Section 2N. The State should encourage high speed rail on the I-15 corridor and light rail in larger communities.
13. Section 2P. The State should encourage urban tree planting by communities and individual landowners. Also, the State should discourage the harvest of large trees, which provide large and stable amounts of carbon storage, unless necessary for forest health or wildfire danger mitigation.
14. Section 2Q. I think it is a good idea to institute a higher cap for distributed energy systems, in order to encourage new renewable energy production and to stabilize the grid.
15. Section 3. Montana needs to continue and improve networking with other states in the area.
16. P. 33, Section 3G. Montana should support the following developing industries: regenerative agriculture, managing public lands for recreation and carbon storage (not extraction of minerals, petrochemicals, and timber). There should be less emphasis on industrial carbon capture, which is unproven.

Thank you again for undertaking this planning process. I hope that you find my comments to be helpful.

Sincerely,
Kathryn Tilly



Hamilton, Montana 59840

From: [Elena Hodges](#)
To: [Climate Council](#)
Subject: [EXTERNAL] Comments on draft Montana Climate Solutions Plan
Date: Monday, April 06, 2020 8:33:46 AM

Council Members,

Thanks for your work drafting the Montana Climate Solutions plan. Besides the specific comments below, I want to emphasize how important it is to prioritize immediate implementation for all possible measures!

-- Please support efforts to expand Montana's ability to understand climate risks and prepare for change. In particular, recommendations 1A through 1H should be funded and acted upon.

-- Montana needs more accessible climate science. Please support a larger Montana Climate Office with more staff, stronger Montana University System climate coordination, research and funding, and increased support from the state to communities so they can develop greenhouse gas reduction and climate adaptation strategies.

-- Recommendations 2A through 2E and 2G through 2K are essential for Montana to reduce greenhouse gas emissions and avoid locking into new fossil fuel infrastructure. Montana is deficient in programs and funding to support energy efficiency and conservation and the key strategies identified, if enacted swiftly and with financial support, are essential. They will save Montanans money while improving public health.

-- A statewide energy efficiency standard would save all Montanans money.

-- Raising the size cap on distributed generation solar systems (aka rooftop solar) would benefit schools, libraries, and other public buildings in their community - saving taxpayer dollars and creating educational opportunities for our youth.

-- Support adoption of low emission vehicle standards and actions that will incentivize/promote/enhance electric vehicles.

-- Please encourage and support community goal setting, energy data collection across sectors, and planning efforts to reduce emissions and save money in local communities.


-- Voluntary controls on oil and gas development are inappropriate. The industry has had decades to voluntarily curb greenhouse gas emissions and has failed to do so. Methane emissions from oil and gas development are easily controlled and should be required. The time has past for voluntary commitments from this greenhouse gas producing sector.

-- Carbon capture and sequestration is not an appropriate climate solution for coal-fired electricity. This unproven technology only makes dirty, expensive coal plants even more expensive and risky. The final recommendations should focus on reducing reliance on coal-fired electricity instead of relying on misguided, expensive, risky, and unproven technology.

Thank you,

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Elena Hodges


Helena, MT