Public Meeting Comment Sheet
Discussion on the Greenhouse Gas Reduction Act Plan

Tuesday, July 14, 2015, 5:30 p.m.
Baltimore, MD

Instructions:

Please use this form to provide any comments you have on the state's progress on addressing climate change and Greenhouse Gas Reduction Act Plan that will be up for renewal in 2016. Once you have completed the sheet, please place in the comment box or mail or email to:

Mr. Brian Hug
Maryland Department of the Environment
1800 Washington Blvd
Baltimore, MD 21230
Email: climate.change@maryland.gov

Please submit comments by Friday, August 28, 2015

Comments Submitted By:
Name: Rev. Amy Sens
Representing: United Church of Christ
Address: 2002 Greenslands Ave
Comments: Climate change is a huge challenge and threat to Maryland. I would like to see continued support for current projects, and stronger RPS standards. In addition, projects that add to quality of life for poor and disadvantaged people—public transportation, energy efficiency in homes,

(Please use an additional sheet or back of this form for comments if additional space is needed)
Subsidies for people who can't afford more money for clean energy, and initiatives that make for cleaner air.
**Considerations: Health & Climate Change**


**Threat:** “Climate change — caused by carbon pollution — is one of the most significant public health threats of our time,” EPA Administrator Gina McCarthy, 09/20/2013

**Opportunity:** Through common-sense measures to cut carbon pollution, we can protect the health of our Nation, while stimulating the economy and helping to prevent the worst impacts of climate change. 

Renewing the Greenhouse Gas Reduction Act is one such common-sense measure.

**Vulnerable Populations will suffer the greatest health burdens**

**Children, the elderly, and people already suffering illness in Maryland**

- Climate change will put vulnerable populations at greater risk — including:
  - Children, who breathe more air relative to their size than adults, are at higher risk of worsened asthma and respiratory symptoms from air pollution and severe weather or illness following severe weather
  - Older adults, especially those with pre-existing health conditions, are at a high risk of cardiac and respiratory impacts of air pollution or illness following serve weather
  - People already suffering from allergies, asthma, weak immune systems, and other illnesses are more susceptible to experiencing health impacts related to climate change
  - Communities burdened with higher rates of diabetes, obesity, or asthma may be at greater risk of climate-related health impacts

**Air pollution caused by greenhouse gas emissions are hazardous to health**

**Ground-Level Ozone**

- Tropospheric, or ground-level ozone, is formed by chemical reactions between greenhouse gases in the presence of sunlight. (This is not to be confused with stratospheric ozone, which protects us from harmful UV rays from the sun.)
- Exposure to ground-level ozone inhibits lung function and is anticipated to cause:
  - 1,000 to 4,300 additional premature deaths nationally per year by 2050
  - 2.8 million more instances of acute respiratory symptoms such as asthma attacks, shortness of breath, coughing, wheezing, and chest tightness, by 2020
  - 24,000 more seniors and 5,700 more infants hospitalized for respiratory related problems, by 2050

**Severe weather will increase the need for and disrupt health care services**

**Extreme Heat Events**

- Extreme heat events are expected to become more frequent and severe due to climate change and will have implications for health care services including:
• Health services utilization, disruption to the healthcare delivery system, and quality of patient care during disasters
• Increase in hospital visits for cardiovascular, respiratory, cerebrovascular diseases, mental health problems, mortality, injury, and illness
• Extreme heat exposure from climate change can be deadly:
  o During June 30–July 13, 2012, maximum daily temperatures in Maryland, Ohio, Virginia, and West Virginia averaged is 9.5°F warmer than normal. 12 Maryland residents died during this period due to excessive heat exposure
  o Severe weather will also include flooding, droughts, storms, and fires that impact healthcare services as well as long term health concerns

Population health status does not return after severe weather events:
• A study of Hurricane Katrina measured health impacts a year after the hurricane and found an increase in disease prevalence, increased health burden directly associated with disruption from Hurricane Katrina, and the adverse effect on morbidity was strongest for nonwhite subjects

Sea level rise, heavy rainfall, and storm surges will increase will disrupt communities and increase water borne disease and disrupt communities
• Sea Level Rise
  o Rising seas and eroding shorelines displace coastal communities
  o Sea level rise and storm surge threatens drinking water supplies and agricultural fields with salt-water intrusion
  o Potential changes in exposure to diseases

• Flooding and Heavy Rainfall
  The frequency of heavy precipitation events has already increased for the nation as a whole (75% increase for the Northeast), and is projected to continue increasing. With nearly 3,000 miles in coastline, Maryland is vulnerable to health concerns from flooding including:
    o Failure of septic systems - Waterborne diseases contaminating drinking water
    o Sewage back-up in plumbing or basements
    o Floodwater containing toxins, bacteria, and sewage, can contaminate drinking water, vegetables growing in fields or gardens, and recreational water sources
    o Water intrusion in buildings, worsening indoor air quality and/or causing toxic mold to grow in ceilings, walls, or insulation
  • Between 2007-2013, Baltimore had on average 13.1 nuisance flood days per year, while Annapolis had 39. Annapolis and Baltimore have the highest increase in number of flood days in the nation

Allergens related to pollen will increase:
• The length of the ragweed pollen season has increased in parts of the US by 11-27 days because of rising temperatures. As the climate warms more pollen is produced and pollen season lengths, there will be an increase in health problems related to allergens:
  o Increases in the symptoms of seasonal allergies
  o Pollen triggers asthma attacks, leading to more ER and hospital visits

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1 The Health Effects of Climate Change on Americans: The White House. 5/2014
2 Climate Change and Your Health: Rising Temperatures, Worsening Gum Disease. American Lung Association of Greater Cincinnati, 2001
3 "Health-Related Deaths After an Extreme Heat Event — Four States" Centers for Disease Control, 2013
4 Health of Indiana Advanced Plan Fellows at 1 Year After Hurricane Katrina. Barlow, et al., The American Journal of Managed Care Vol. 15 NC. 1; 2009
5 Climate Change Impacts in the United States U.S. Global Change Research Program. 2013
LEAGUE OF WOMEN VOTERS OF MARYLAND, INC.
111 Cathedral Street, Suite 201, Annapolis, MD 21401

Testimony to Maryland Climate Commission
July 14, 2015, Baltimore, MD

Members of the League of Women Voters of Maryland and the national League have repeatedly expressed our concerns about global climate change and its impacts on our environment, our communities, our health, our economy and our very future.

We have reached a critical junction in Maryland. Our 3,000 miles of tidal shoreline make us one of the most vulnerable states in the nation when it comes to sea level rise. The Annapolis and Baltimore water fronts and Ocean City face frequent flooding today. Baltimore set a record last month for the wettest June with over 13 inches of rainfall. We recently organized an educational Forum at Chesapeake College in Wye Mills on the eastern shore. “The Future is Now: Dealing with Rising Seas on Maryland’s Shores” was well-attended and highlighted action to protect the people in Eastern shore communities that face eroding coastlines and flooded farmlands.

We support the work of the Maryland Climate Commission to identify and seek solutions for the potentially catastrophic disruptions we face from increasing fossil fuel emissions. The Greenhouse Gas Reduction Act Plan has the potential to save lives and livelihoods and to leave a livable Maryland for our children and grandchildren. While the GGRA has 150 programs and policies that will help get us to clean energy goals, this important Act is due to expire in 2016. The Act must be renewed because the programs are key to making the greenhouse gas reductions that we desperately need.

The Renewable Portfolio Standard (RPS) for clean energy is an important feature of the GGRA. This framework for incentivizing clean, renewable sources, such as wind and solar, is essential if we are to cut Maryland carbon emissions 25 percent by 2020. However, with global warming accelerating faster than scientists predicted even five years ago, we can and should do more. We feel strongly that the RPS should be strengthened. In the future, we will need to increase the percentages of clean energy in the RPS and shorten the time frame for achieving these percentages, for example, realizing a 40 percent clean energy portfolio by 2025.

We are also facing the hard fact that the impacts of climate change fall relentlessly on our poorest communities. We urge the Commission to emphasize programs that permanently lower energy bills through conservation measures. Certain home repairs, better insulation and energy efficient appliances can lower energy bills and improve the health and quality of life for low-income families.

Betsy Singer, LWVMD
elizabethsinger446@hotmail.com
Maryland’s Greenhouse Gas Reduction Plan
Testimony from Richard Reis, PE
Chair Energy Committee, Maryland Chapter of the Sierra Club
July 14, 2015

Hi, I’m Richard Reis. I serve as chair of the energy committee of the Maryland Sierra Club.

I thank the Maryland Department of the Environment and Maryland Commission on Climate Change for developing a Greenhouse Gas Reduction Plan and for holding this public forum.

I appreciate this plan because the world is facing a slow disaster as the effects of climate change increase over the coming years. As noted in your report, Maryland is especially vulnerable to these changes because of our long and low-lying coastline.

The report shows that Maryland can do its part in mitigating climate change and thus be a positive role model to the nation and the world. At the same time these steps, such as investing in clean renewable energy and energy efficiency, save money, grow our economy, and produce rewarding jobs for Marylanders.

I especially appreciate and endorse this sentence from the executive summary, page 8 under “Energy”: “The Renewable Portfolio Standard can play an even greater role in meeting Maryland’s greenhouse gas emissions reduction goal if high carbon-emitting fuels are eventually removed from Tier 1 eligibility and if the overall Renewable Portfolio Standard is accelerated to 25 percent by 2020.” Thus we should increase the RPS, while cleaning it up.

Unfortunately, that statement is at odds with another statement on page 7 of the same document which calls for managing our forests for “renewable biomass for energy production”. I take issue with the concept of burning forests for energy production, because it takes decades for those forests to rebuild and reclaim the carbon released by burning.

Finally, it’s also important to note that since limiting heat-trapping carbon pollution will help also clear the air of health destroying toxins. This is because these decreases require a great reduction in the use of fossil fuels that emit like nitrogen oxides, ozone, sulfur dioxide, particulates, and heavy metals when burned.

Thank you for your time and attention. I’ll be happy to answer questions as well.

Richard Reis, PE
Maryland Commission on Climate Change Meeting
July 14, 2015
Public Comments from Food & Water Watch

About Food & Water Watch (FWW): FWW champions healthy food and clean water for all. We stand up to corporations that put profits before people and advocate for a democracy that improves peoples' lives and protects the environment.

On behalf of Food & Water Watch’s 23,000 members and supporters in Maryland, we urge the Maryland Commission on Climate Change to make the following recommendations in their report due to the state legislature in November 2015:

1. Maryland should eliminate dirty sources of energy from Tier I in the Renewable Energy Portfolio Standard (RPS), including manure to energy sources, to meet its greenhouse gas (GHG) reduction goals.
2. Maryland should eliminate pollution trading as a strategy to reduce greenhouse gas emissions.
3. Maryland should ban hydraulic fracturing and not rely on natural gas to meet its GHG reduction goals.

1. Maryland should eliminate dirty energy sources from Tier I in the RPS, including manure to energy sources, to meet its GHG reduction goals.

- One of the recommendations in the GGRA Plan is to increase the amount of clean, renewable electricity—like solar and wind power—that we use to power our homes and communities. The Maryland Renewable Energy Portfolio Standard (RPS) is a law that requires Maryland to obtain 20 percent of its electricity from renewable sources, as defined by statute, by 2022, with a solar carve-out which requires that two percent be obtained from solar energy generation by 2020.

- The RPS is underperforming. The GGRA Plan predicted that the RPS is capable of reducing 10.96 million metric tons of CO2 in 2020—nearly 20% of the state's total reduction goal. However, the program is only on track to reduce 4.1 million metric tons of CO2, which is less than half of the original target.

- In addition to investing in new renewable energy in Maryland, the GGRA acknowledges that Maryland needs to narrow the qualifying sources to favor low or no carbon fuel sources to drive additional GHG emissions reductions.

- Currently, Maryland's RPS allows a number of different dirty fuel sources to qualify as renewable sources of energy, which are eligible to generate Tier 1 RECs. These dirty fuel sources include poultry litter-to-energav and enerav from thermal biomass systems that use
primarily animal manure, including poultry litter and associated bedding.

- These dirty energy sources have the potential to increase CO\textsubscript{2} emissions as well as other pollutants. For example, Fibrominn, the only operational poultry litter-fueled power plant in the United States, emits higher levels of CO\textsubscript{2}, carbon monoxide, NOx, VOCs, and PM10 than Maryland’s coal-fired power plants.

- In 2013, the State of Maryland signed a contract with Green Planet Power to build a similar “biomass” plant of up to 20 megawatts in size. The company has proposed combusting 56 percent litter and 44 percent wood waste. At best, the facility is a hybrid plant that will barely consume half the waste problem from chickens. In addition, the GPPS proposal actually states that the plant will consume 150,000 bone dry tons of wood fuel per year, enough to actually power all 20 megawatts of proposed generation. Either this is an error or the plant developers anticipate the possibility that the plant will sometimes run entirely on wood fuel, if built.

- The proposed power plant raises major carbon pollution concerns. Any facility thatcombusts biofuels like chicken litter or wood waste runs the risk of emitting even more carbon dioxide per unit of energy produced than coal combustion. Unfortunately, GPPS, in its proposal, erroneously declares wood waste and chicken litter to be “carbon neutral” with no details and no scientific grounding.

- To ensure that the RPS meets its emission reduction goals, Maryland’s Commission on Climate Change should recommend to the State Legislature that they amend the RPS to eliminate dirty sources of energy from Tier 1, including all manure to energy sources, in their report due November 2015.

- Furthermore, the Commission should recommend that the legislature continue to reject attempts by companies like Perdue to create a new thermal tier in the RPS to increase financing for anaerobic digesters.

- While anaerobic digesters have been promoted as a solution for capturing methane emissions, research has demonstrated that anaerobic digesters are not the ‘silver bullet’ for manure management. The nutrient (nitrogen and phosphorus) loads are not reduced during the digestion process. The resulting effluent must still be managed appropriately and, thus, digesters do not effectively alleviate the environmental challenges associated with storing large quantities of manure-based nitrogen or phosphorous or applying it to crop fields in a manner that will not exacerbate surface or groundwater contamination. Utilization of biogas in digesters also carries air quality implications due to emissions from the combustion process.

2. **Maryland should eliminate pollution trading as a strategy to reduce greenhouse gas emissions.**

- The GGRA plan includes a number of conclusory statements that nutrient trading will help decrease greenhouse gas emissions by stacking carbon credits onto existing nutrient credits.

- In theory, pollution-trading programs generally exist for two reasons. First, to allow purchasers of credits who are subject to technological mandates on emission controls – in this case industrial GHG emitters – to evade the cost of those controls; and second, to create financial incentives for other industrial polluters, in this case Maryland agricultural
operations, to do what they should be doing anyway to reduce their own contribution to the problem. This is a misguided plan for many reasons, but one of the biggest issues is that it destroys one of the most important aspects of our modern environmental and public protection framework - one that has mostly kept our waterways from being open sewers and our airways mostly breathable - a technology-driven approach that challenges industries to invent and implement better systems to reduce or eliminate pollution discharges.

- Another major shortcoming of trading, on the credit generating side, is that it is an avoidance tactic used to circumvent doing what needs to be done, that is, to place mandatory controls on all sources of pollution. If Maryland farmers can implement practices to reduce green house gas emissions, than those practices should be mandated by the state. If the state were really serious about reducing GHG emissions, then voluntary compliance would not be an option. Voluntary compliance has proven, time and again, to be a failed approach that only ensures ongoing problems and net increases of pollution.

- Finally, the Climate Commission should not pursue a trading strategy, because it will likely result in immoral outcomes. Historically, communities living near facilities that increase their pollution loads by purchasing credits are overwhelmingly poor or communities of color. Use of allowances generated by agricultural operations at industrial facilities would deny on-site pollution reductions for communities of color living near industrial facilities like refineries and power plants. In fact, the first potential pollution trade between an industrial facility and agricultural operations in Maryland is one proposed by power plant company NRG Energy who wants to buy credits to allow it to continue, and even increase, its pollution to a waterway in a community that is 70-80% Black and Latin.

3. Maryland should ban hydraulic fracturing and not rely on natural gas to meet its reduction goals.

- Hydraulic fracturing, or fracking, is the primary method of extracting natural gas in the United States today. Fracking, and the infrastructure necessary to support it, is a leading source of methane emissions, and burning natural gas results in significant carbon dioxide emissions. Science is clear that extracting and burning natural gas is a major source of climate pollution, on par with extracting and burning coal and oil.

- While fracking is not currently taking place in Maryland, at least 5 gas basins lie under the state and could be targeted for fracking. The state should ban fracking to keep this gas in the ground and protect communities from the local health and environmental and health impacts from widespread drilling and fracking.

- The state cannot not rely on natural gas to meet its emissions reduction targets. Natural gas is 80 to 98 percent methane, which is about 86 times as potent of a greenhouse gas as carbon dioxide over a 20-year timeframe. Current estimates vary regarding how much natural gas, and thus methane, leaks into the atmosphere. Generally, more methane leaks than officials estimate. According to the best available science, the equivalent of 3 percent of natural gas produced is leaked. This leakage completely offsets the reduced carbon dioxide emissions that come from switching from coal to natural gas.

- Sold as a climate benefit, natural gas is a false solution. When estimating the climate change impacts of fuel switching from coal to natural gas, the climate commission should take national estimates of methane leakage into account, and also emphasize the
importance of the 20-year timeframe as we approach tipping points, and the prospect of irreversible changes in the stability of our climate.

- Methane and carbon dioxide emissions mean that natural gas is a climate problem, along with coal and oil. In order to achieve continued emissions reductions beyond 2020 and move towards the state's longer term goal of reducing emissions 90% by 2050, the state must end its reliance on all fossil fuels. Maryland can achieve its 2050 goal by aggressively implementing conservation policies, by taking advantage of energy efficiency solutions, and by building out zero-carbon power in the state, such as from solar and wind energy.
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Email: climate_change@maryland.gov

Please submit comments by Friday, August 28, 2015

Comments Submitted By:

Name: NINA BETH CARDIN  
ncarding.consent.net

Representing: FAITH COMMUNITIES

Address:

Comments: THE EARTH, AIR, WATER, FOOD THAT WE ENJOY HAS PASSED THROUGH HUNDREDS OF GENERATIONS, BILLIONS OF PEOPLE, AND IT STILL WORKS SO THAT WE CAN ENJOY A HIGH QUALITY OF LIFE; IT IS OUR OBLIGATION, OUR MORAL CALLING TO ASSURE THAT ALL FUTURE GENERATIONS ENJOY THE BLESSINGS WE ANCESTORS AND PASS HERITAGES TO OUR CHILDREN. THEIR RIGHTS ARE NO LESS THAN OURS. PLEASE DO WHAT IS RIGHT!

(Please use an additional sheet or back of this form for comments if additional space is needed)
STATEMENT OF GIRUME ASHENAFI (OR NURSE MEMBER) 1199SEIU UNITED HEALTH CARE WORKERS EAST IN SUPPORT OF THE MARYLAND GREENHOUSE GAS REDUCTION PLAN BEFORE THE MARYLAND CLIMATE COMMISSION

July 14, 2015

Chairman Grumbles and Members of the Maryland Climate Commission:

1199SEIU United Healthcare Workers East represents over 8,000 healthcare workers in Maryland. We represent workers at almost every stage of the health care delivery process, both in long term care facilities and hospitals.

The top programs in the Greenhouse Gas Reduction plan require Maryland to use energy more efficiently and increase Maryland’s use of clean, renewable energy while creating jobs and growing our economy. These are critical solutions to climate change and to improving the lives of the most vulnerable among us. Every day, healthcare workers see firsthand the impacts of climate change and air pollution from dirty energy sources. Science and data back up their experiences:

- Last month, the international academic *Lancet Commission on Health and Climate Change* found the effects of climate change are being felt today, and future projections represent an unacceptably high and potentially catastrophic risk to human health. They cite increased heat stress, increased frequency of intense storms, air pollution, food insecurity, and mental ill health among the direct and indirect effects of climate change.

- Climate change public health impacts fall disproportionately on Maryland’s communities of color and poorest communities, which suffer from more polluted air and higher rates of breathing problems. Extreme weather events also disproportionately impact communities of color and low income communities.

- A 2014 study found that communities of color breathe in nearly 40% more polluted air than whites, and poor white Americans endure 27% heavier pollution than do wealthy white Americans.¹

- Nationally, 68% of African Americans live within 30 miles of a coal fired power plant — the distance within which the maximum effects of the


<http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0094431#references>
smokestack plume are expected to occur. By comparison, about 56% of the white population live within 30 miles of a coal-fired power plant.²

For us, fighting climate change is about fighting social injustice. That is why 1199SEIU members took to the streets of New York with over 400,000 people in the People's Climate March last summer.

Here in Maryland, one of the top programs in the GGRA Plan is increasing the amount of clean, renewable electricity—like solar and wind power—that we use to power our homes and communities. We commend Maryland for being on track to meet our current clean energy requirement of 20% by 2022. But, we need to do better. **We need to reach 25% clean electricity consumption by the year 2020.** 1199SEIU proudly supported legislation in 2015 to do just that. We also applaud Baltimore City for announcing last week a partnership with Civic Works to install solar arrays and cool roofs on ten homes and a community center in East Baltimore while giving local residents solar job training as part of the project. We can and should do more.

We thank Secretary Grumbles for his leadership on this issue and respectfully urge the Commission to recommend reauthorization of the Greenhouse Reduction Act. Thank you for your consideration.

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Email: climate.change@maryland.gov

Please submit comments by Friday, August 28, 2015

Comments Submitted By:

Name: Seth Bush for Earl Thomas

Representing: Oliver Community & East Baltimore

Address:

Comments: Attached

(Please use an additional sheet or back of this form for comments if additional space is needed)
My name is Seth Bush, and I am a Baltimore resident. I recently met with a community leader from Oliver who couldn't be here tonight, and he had this to say.

Baltimore needs bold climate action, or our communities will suffer.

15,000 years ago early humans were are able to survive a dramatic change in the earth's climate commonly referred to as the ice age. They did this by being nomadic, creating new ways to live by depending on each other and by building innovative shelters. Baltimore is facing climate change issues today, not an ice age, but it will be just as dramatic if you don't face it head on.

One hundred year storms are becoming the norm, large storm cells that produce 2 to 4 inches of rain in under 20 min have already showed us that our storm water infrastructure is outdated and not up to the task in many of our urban communities. Our housing stock has become outdated and dilapidated. Many Baltimorenians know a friend or a family member with a leaky roof or a basement that floods with heavy rain. We all know that many of our children are living in homes with severe mold growth throughout the house, pests thriving in the moisture rich environment, and other problems endemic to homes that cannot withstand the stronger more frequent downpours and snow events we're starting to experience. These problems take an immeasurable toll that compounds and is compounded by so many other oppressive factors of life in a city with neglected infrastructure, unhealthy air, poor education, and a broken law enforcement system. There is a strong connection between not being able to live comfortably in your own home and not being successful in life, and climate change will make that situation worse if we do not act now.

If you're not following me or you don't see the correlation between the Ice Age and rain storms take this simple statement. The cave man was able to move, bond together, and adapt to a changing climate. For those that live in poor urban communities, there is no possibility of moving away from the homes passed down from one generation to the next. There is no new innovative housing that everyone can afford that doesn't come with a 3 year waiting list with no guarantee. In many cases there is no bonding together, or mass sharing, or resources. The cave man had a better chance of surviving climate change than we do living in the communities we live in. I can say this weird weather we have been having is only going to get worse and our most at risk communities are not ready and are already paying the toll of climate change.

We need to renew the Greenhouse Gas Reduction Act and we need to take bold action by setting even more ambitious reduction goals and strengthening the programs Maryland already has in place.

Beyond mitigation we need to focus energy on preparing our communities for the change that is already inevitable. Low income communities and communities of color are the most vulnerable, and they need support programs now.