

October 21, 2020

Hon. Kelly Russell  
Chair, National Capital Region Transportation Planning Board  
President Pro Tem, Frederick Board of Aldermen

Re: Comments on need TPB climate action steps, travel survey, and transit-oriented centers

Dear Chair Russell,

We are deeply concerned that TPB staff are not committing to VMT-reduction strategies in their input to the update of the COG climate plan. We have submitted comments to the CEEPC that apply equally to our input to the TPB Visualize2045 update.

TPB's climate approach, as outlined in the October 15 memo by director Srikanth, is to focus on fuel efficient car standards, vehicle electrification, and the Transportation & Climate Initiative (TCI). Of the "bold, system-wide actions" the memo says are needed, there is no mention of regional strategies to reduce VMT. [As detailed in the \*Driving Down Emissions\*](#) report by SGA, EVs are not enough, and land use, urban design, and transit are essential for reducing VMT and transportation emissions, meeting our climate targets, and achieving equity, public health, and livability.

COG is setting a very ambitious goal for electrification in its draft climate plan, assuming that 34% of light passenger vehicles on the road in 2030 will be electric. California's analyses show that even with significant adoption of EVs, rising VMT will cause rising emissions. Therefore, the CEAP and TPB need additional bold actions:

1. Set even stronger targets for housing and job growth in High-Capacity Transit (HCT) station areas by prioritizing close-in, walkable, mixed-use Activity Centers with high-frequency transit, and addressing the E-W economic and racial divide.
2. Make affordable housing in TOD locations a key part of the land use strategy, with specific goals and strategies.
3. Set clear targets to significantly reduce total and per capita VMT below the 2030 and 2050 baselines and increase non-auto mode shares well above baselines.
4. Include strategies to price existing lanes in congested travel markets rather than adding more HOT lanes and price parking across the region.

Your Travel Survey highlights the benefits of transit-oriented communities. The Core and Activity Centers have very high commute walk, bike, transit mode share, and very good non-commute mode shares. But major suburbs still have far to go on TOD, and recent road expansions are not helping.

We commend your Transit-Oriented Communities initiative, but urge you to place overwhelming priority in Visualize 2045 on transit, local street networks, and bike/pedestrian infrastructure, while slashing new highway capacity. We have just one decade to act on the climate crisis.

Stewart Schwartz, Executive Director