



## MEMORANDUM

**TO:** TPB Steering Committee  
**FROM:** Erin Morrow, TPB Transportation Engineer  
**SUBJECT:** Comments received on state Carbon Reduction Strategies  
**DATE:** November 3, 2023

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In [October](#), the state departments of transportation briefed the Transportation Planning Board (TPB) on the Carbon Reduction Strategies that they are required to develop as part of the Bipartisan Infrastructure Law's Carbon Reduction Program. The strategies must be submitted to U.S. DOT by November 15, 2023. States are required to consult with the Metropolitan Planning Organizations (MPOs) in the state as they develop their strategies.

Over the last year, TPB staff provided input to the states as the strategies were being developed. As was presented in October, TPB has received and reviewed draft strategies from the Maryland Department of Transportation (MDOT) and the District Department of Transportation (DDOT), which are posted on the TPB's October meeting page. As of this time, the Virginia Department of Transportation (VDOT) strategy is still under development and has not been shared for review.

After the October TPB meeting, two written comments were submitted to TPB Staff and are attached to this memo:

- Bill Pugh, Coalition for Smarter Growth; received on October 25, 2023
- Allison Davis, WMATA; received November 1, 2023

The comments from Coalition for Smarter Growth were also sent directly to the state DOTs. TPB staff transmitted the comments from WMATA to the state DOTs on November 1, 2023.

The U.S. DOT is expected to certify the strategies in the February 2024 timeframe. TPB staff will inform the TPB upon certification.

Please feel free to contact me ([emorrow@mwcog.org](mailto:emorrow@mwcog.org)) with any questions.

**From:** [Davis, Allison](#)  
**To:** [Kanti Srikanth](#); [Erin Morrow](#)  
**Cc:** [Phillips, Mark E.](#); [Healy, Rachel](#); [Roetzer, Kate M.](#); [Webster, Thomas J.](#)  
**Subject:** Metro Comments on the state-level Carbon Reduction Program plans  
**Date:** Wednesday, November 1, 2023 12:17:09 PM

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Kanti and Erin-

Thank you for the opportunity to provide comments on the state-level Carbon Reduction Program plans. Below are Metro's comments on the Congestion Reduction Strategies developed by our partners at DDOT, MDOT, and VDOT. The draft plans generally establish a solid framework for identifying and advancing strategies and projects that will help the region meet its air quality and carbon reduction goals, but Metro believes there is a missed opportunity to recognize the role of transit as a core, practical solution for attaining those goals. We are also concerned that the drafts set up yet another framework that presents difficulties for funding regional projects that cross jurisdictional and state borders. In that light, we would appreciate it if you would include the following comments in TPB staff's response to the states.

#### Prioritize mode shift and driving/VMT reductions

TPB's 2021 climate change mitigation study determined that no single strategy will attain the region's GHG reduction targets. Yet most of the region's focus and discussions related to reducing transportation emissions seem to center almost exclusively on zero-emissions vehicles. The region's current approach seems to be a business-as-usual stance towards road building and highway expansions paired with funding electric vehicle charging stations and ZEV incentives. Zero-emissions vehicles must and will be a key component of the region's climate change mitigation strategy, but cannot by itself meet the 2050 targets unless the region achieves **both** near-total conversion of all privately-owned vehicles **and** an electrical grid powered entirely by renewable energy sources (e.g. a "clean grid"). Considering the massive investments, policy changes, and individual market decisions required to achieve those aims, plus the projected supply chain issues surrounding the raw materials required to build car batteries, it is unrealistic for the region to focus all or most of its planning and funding resources on zero-emissions vehicles and charging stations.

On that note, and recognizing our shared goal of a carbon-neutral future with clean air, Metro strongly encourages each of the state Carbon Reduction Strategies to prioritize mode shift from personal vehicles to transit and non-motorized vehicles, and to set targets for reductions in driving and total vehicle miles traveled. Every trip taken on transit instead of a car helps decrease congestion and avoids tailpipe emissions. These policy statements should focus on total regional VMT rather than per capita VMT, as it is the total amount of driving and resultant emissions that help determine GHG levels, rather than how much each individual contributes to that total. MDOT's plan does specifically list VMT reduction as a key strategy, and DDOT's CRS references the moveDC plan's goals. We would ask TPB to strongly encourage all the DOTs to firmly and clearly state that mode shift and driving / VMT reduction are primary goals and key strategies in their CRSes.

#### Recognize the central role of transit in reducing carbon – and that Metro plays in the NCR

To that end, Metro asks the DOTs to include clear and direct statements on the central role transit plays in reducing carbon, improving air quality, and making communities more livable, sustainable, and economically competitive. Attaining the region's ambitious climate goals will require a complex array of strategies, tools, and incentives, but transit remains the single most effective and resource-efficient way to move large numbers of people through busy corridors. Transit must be the core of the region's – of the nation's – carbon reduction plans.

And Metro plays a unique role in the National Capital Region. It is an interstate compact; the region's primary transit service provider and great connective tissue; major employer and purchaser of goods and services; and one of the region's largest energy consumers. Metro's investments and operational decisions have immediate and significant impacts on household costs, health, equity, economic prosperity, and the overall social and economic wellbeing of the region. We think it would be helpful for the state CRS documents to recognize and validate both the centrality of transit in fighting climate change, and Metro's unique position as an interstate compact serving all three jurisdictions.

And those references should encompass the entire multimodal transit network. Each CRS document mentions transit as a carbon-reduction strategy, but examples of eligible projects are largely bus and bus priority treatments. While Metro applauds the emphasis on improving the region's bus network – very much aligned with Metro's ongoing [Better Bus Program](#) and Network Redesign – we are concerned that it implies rail projects are not eligible for related funding. Metro requests that the CRS documents include mention of Metrorail improvements as eligible projects.

#### Specify funding eligibility cross-border projects and strategies

On a similar note, Metro is concerned that the CRSes may be creating yet another planning and project programming framework that creates barriers to funding cross-border, interjurisdictional projects. Metro strongly urges TPB to request that the DOTs specifically state their willingness to collaborate across state lines and to fund cross-border, interjurisdictional carbon-reduction projects. Those statements should make it clear that the NCR states and localities will support, and consider funding, strategies and projects that cross borders so long as they are included in the region's Visualize 2050 long-range plan.

#### Reference Metro's new Strategic Transformation Plan: *Your Metro, The Way Forward*

- Metro's Strategic Transformation Plan, [Your Metro, The Way Forward](#), sets a vision for Metro to become the region's trusted way to move more people safely and sustainably by attaining four primary goals: Service Excellence, Talented Teams, Regional Opportunity and Partnership, and Sustainability. The Your Metro plan builds on concepts found in the previously-adopted Sustainability Vision and eight Sustainability Principles. It recognizes sustainability as one of Metro's core values, as well as a cost-effective way to expand mobility and access, improve transit system performance, achieve climate and environmental goals, and contribute to livable and equitable communities. Metro encourages all of the state CRS documents to incorporate the Your Metro plan by reference, and to note its strong goal statements, targets, and initiatives related to sustainability.

*Specific comment on MDOT's CRS:* Metro recognizes and appreciates MDOT for specifically referencing Metro as primary planning partners, and for noting our role as one of MD's largest transit operators. The CRS document content referring to Metro's sustainability goals references previous policy documents, such as the Energy Action Plan and Sustainability Vision and Principles. We recommend and would appreciate MDOT updating that section to reflect the more recent mission statement, vision, and goals related to sustainability as laid out in our *Your Metro* Strategic Transformation Plan and summarized below:

Our biggest impact is through the service we provide, and getting more people to take Metro is one of the most effective ways to support sustainability. Metro will also continue to commit staff and invest resources to drive sustainability, making our operations more efficient, resilient, and sustainable and contributing to a green economy and green workforce.

Furthering our commitment to environmental sustainability, Metro is working toward targets set by the Strategic Transformation Plan within three areas:

1. Decarbonize Metro infrastructure and equipment to eliminate use of fossil fuels from Metro business through carbon-free energy sources such as solar power utilization, and a transition to zero emission vehicles.
2. Optimize natural resource stewardship to protect, conserve, and enhance places where Metro operates (including promoting recycling, greenspace, water and stormwater management and other sustainable practices).
3. Modernize design, construction, and operations to meet sustainability and climate resiliency challenges (including pursuing green certifications for buildings).

Please don't hesitate to reach out to me or Mark Phillips (CC'd) if you have any questions or clarification on the above.

Best,  
Allison

**Allison Davis** (she/her)  
Acting Senior Vice President  
Planning and Sustainability  
Washington Metropolitan Area Transit Authority  
300 7th Street, SW  
Room 502-14  
Washington DC 20024

Phone: 202.962.2056  
Mobile: 240.814.3356  
Email (Preferred): [adavis5@wmata.com](mailto:adavis5@wmata.com)





## MEMORANDUM

**To:** Chris Berg, Director of Sustainability, VDOT  
Emma Cross, Air Quality Planner, DDOT  
Shawn Kiernan, Senior Program Manager for Strategic Climate Initiatives, MDOT

**From:** Bill Pugh, AICP CTP, Coalition for Smarter Growth

**Cc:** Erin Morrow, TPB; Kanti Srikanth, TPB; TPB Board Chair and Vice Chairs; state DOT  
TPB representatives

**Date:** October 25, 2023

**Re:** **Comments on VDOT, MDOT and DDOT draft Carbon Reduction Strategies**

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The Coalition for Smarter Growth respectfully asks your consideration of these comments as you refine your Carbon Reduction Strategies (CRS) prior to submittal to FHWA next month. These comments build on our October 17 letter to the National Capital Region Transportation Planning Board.

The VDOT, MDOT, and DDOT Carbon Reduction Strategies should:

- 1. Reflect TPB and national findings that reducing VMT is essential to meeting minimum GHG targets** – The [TPB Climate Change Mitigation Study of 2021](#) and other national studies have found that states must reduce per capita passenger Vehicle Miles Traveled on the order of 20% by 2030 (compared to pre-pandemic levels) with further reductions in later years, in addition to rapidly transitioning to electric vehicles, to meet greenhouse gas reduction targets. For example, California, which has the most ambitious EV adoption program in the country, has found that the state must also “Achieve a [passenger vehicle] per capita VMT reduction of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.” to meet its greenhouse gas reduction targets. ([2022 Scoping Plan](#), California Air Resources Board)
- 2. Include quantified targets for per capita VMT reduction and electric vehicle adoption** – CSG applauds the strong mode share targets in DDOT’s plan and that all three plans include vehicle travel reduction strategies. However, for measuring progress and performance, all three DOTs need to include quantified targets for per capita VMT and EV adoption to meet relevant interim and longer-term greenhouse gas reduction targets.
- 3. Address the increased greenhouse gas emissions from state highway capacity expansion plans** – Virginia and Maryland have extensive planned highway and arterial capacity expansion projects that will counteract their carbon reduction strategies. Studies show that [road widening typically results not only in more driving but also more emissions](#). Reducing traffic congestion can lower a car’s tailpipe pollution per mile driven, but expanding highways and roads generally induces more people to drive more

miles and offsets those carbon emissions benefits – worsening our climate problem. The CRS need to show how they will either scale back highway expansion projects or quantify how they will offset the induced demand and lifecycle emissions impacts through more ambitious implementation of carbon reduction projects.

4. **Virginia CRS needs to incorporate a comprehensive on-road transportation decarbonization strategy** – The intent of the federal Carbon Reduction Program is to help states develop overall strategies for reducing on-road transportation sector emissions. The MDOT and DDOT plans show, through reference to detailed climate action planning and metrics, these overall strategies with quantified goals. At the October 18 TPB meeting, Chris Berg, VDOT Sustainability Director, said that the Virginia draft CRS is “narrowly focused on one federal funding source” and is “not a roadmap for across the board decarbonization.” This proposed approach would be a missed opportunity for Virginia, its MPOs, and rural communities. Transportation is the Commonwealth’s largest emitter of climate pollution. If VDOT does not have a decarbonization strategy for the on-road transportation sector (with quantified metrics and specific recommended actions to achieve them), then its CRS should include timely development of such a strategy to be effective.
  
5. **Further consultation with the public, TPB, and other MPOs** – We appreciate the submittal by MDOT and DDOT of their draft CRS to TPB. We also appreciate the VDOT public input survey on its CRS and reporting the results in its presentation to TPB. We encourage all three DOTs to engage the public and MPOs on refinement, implementation and updates to their CRS and on project prioritization for state Carbon Reduction Program funds.