January 7, 2021

Mr. Jason R. Groth, AICP **TPB Technical Committee**

Re: Comments for TPB Technical Committee Meeting, January 8, 2021

Dear Chairperson Groth,

The Coalition for Smarter Growth respectfully submits these comments regarding agenda items on tomorrow's TPB Technical Committee meeting for consideration by members and staff.

Visualize 2045 Land Use Assumptions

The TAC presentation states that the Round 9.2 cooperative land use forecast will be used in the Visualize 2045 analysis. The MWCOG region has adopted two recent policies that need to be included in the land use scenario used in Visualize 2045, if these are not being incorporated in the forthcoming Round 9.2 forecast:

- Regional Housing Targets Two of the three adopted targets are particularly relevant to the forecast: 1) Incorporate an additional 75,000 housing units in the region by 2030 and 100,000 units by 2045, above those in cooperative land use forecast Round 9.1; and 2) At least 75 percent of new housing should be in Activity Centers or near high-capacity transit.
- 2030 Climate and Energy Action Plan Includes this land use objective: By 2030, 75 percent of new housing must be developed in Activity Centers and near high-capacity transit. Note that this target goes beyond the regional housing target (and the 2018 Visualize 2045 land use assumption) by specifying that the 75% of new housing must be near high-capacity transit stations and within an Activity Center.

TPB Climate Change Planning Work in 2021

We commend TPB for conducting a more in-depth analysis of how the region can address its largest source of GHG emissions to meet the region's adopted climate targets. This analysis must inform the current Visualize 2045 update – the region can't wait until the next CLRP update (to be completed in 2026) to do the work needed to achieve our 2030 climate target. CSG has the following comments after reading the December 8 staff memo by Dusan Vuksan and Mark S. Moran:

• GHG analysis should inform Visualize 2045 – TPB's climate change and GHG analyses need to inform the Visualize 2045 update. The memo does not state how this will happen. We request that TPB staff explain to the Technical Committee how the analysis will do this and whether key portions of the scenario analysis can be completed sooner than the end of this calendar year given the schedule of the conformity analysis (inputs and scope to be approved by the TPB Board in June 2021). We ask that the analysis be complete and reported to the TPB Board in June 2021, that subsequent VMT and GHG emissions analysis be applied not just to the entire modeled CLRP package but reported as feasible for major projects or project packages, and that the CLRP package as a whole be designed to significantly reduce VMT and emissions to achieve the 2030 climate goal.

- Literature review needs to incorporate other sources In addition to TPB's past analyses, there are other valuable studies and experience, from both the metropolitan Washington region and elsewhere. In particular, TPB staff should be sure to review studies such as WMATA's ConnectGreaterWashington Policy Alternatives study, California Air Resources Board studies on GHG and VMT (such as activities under SB 375 Sustainable Communities Strategies) and analyses by other metro areas (e.g., Plan Bay Area 2050, Minneapolis Transportation Action Plan, Vancouver BC Climate Emergency Action Plan, Denver 2050 Metro Vision Regional Transportation Plan Scenario Planning, Analysis of Emission Reduction Pathways for North Carolina's transportation sector, and others).
- Scenario study needs to assess co-benefits of GHG reduction strategies The evaluation of different strategy packages that achieve GHG reductions of 50% by 2030 and 80-100% by 2050 needs to also measure the extent to which they help the region meet its other goals articulated in Visualize 2045 (e.g., Aspirational Initiatives), Region Forward, 2019 Regional Housing Targets, and TPB policies on equity and safety. Among these goals are increasing access and connectivity (e.g., bringing jobs and housing closer together, improving accessibility for historically transportation-disadvantaged individuals) and providing a comprehensive range of transportation options (e.g., proximity to transit, non-auto mode share). VMT reduction, in addition to being an essential part of reducing transportation sector GHG, has many co-benefits that are well documented nationally and in our region. Our region will not achieve its equity, sustainability, economic and livability goals if our climate strategy relies on electric vehicles without also reducing auto-dependence, sprawl, and regional jobs-housing imbalances.
- Carbon Neutrality by 2050 CSG agrees with the focus of the scenario study on 2030. However, given the timeframe of TPB's transportation plans, the scenario analysis needs to also look at the longer timeframe (as suggested in the memo). CSG anticipates that MWCOG will soon need to update its 80% reduction by 2050 climate target based on climate science, best practices among U.S. and international cities, policies of the incoming Biden administration, and adopted or proposed goals of 126 other countries which aim for carbon neutrality by 2050.
- Scope of work review by TPB members We ask TPB staff to report to the Technical Committee
 and Board on the process for developing the scope of work for the scenario study, types of
 strategies to be considered, and opportunities for TPB members and the public to review and
 provide feedback.

Thank you for your consideration.

Sincerely,

Bill Pugh, AICP CTP Senior Policy Fellow

Bill Pugh

CC: Kanti Srikanth, TPB Staff Director
Stacy M. Cook, AICP, TPB Principal Planner
Lyn Erickson, AICP, TPB Plan Development and Coordination Program Director
Mark S. Moran, TPB Program Director, Travel Forecasting and Emissions Analysis
Councilmember Charles Allen, District of Columbia, TPB Board Chair