

Public Comment from the May 21, 2014 MWAQC Meeting:

Stewart Schwartz from the Coalition for Smarter Growth circulated a letter from 25 environmental, health, and transportation organizations to the Transportation Planning Board (TPB) recommending that TPB take action to align the Constrained Long Range Transportation Plan with climate change goals. Mr. Schwartz said that the CLRP indicates that greenhouse gas emissions will rise even though vehicle miles traveled per person is remaining flat. The downtown core and the Chesapeake Bay are at risk from climate change. More support is needed to help shift transportation towards alternative modes (as in the District of Columbia, Arlington, and Bethesda) and meet Region Forward targets, climate goals and air quality goals.

The letter is attached.

*1000 Friends of Maryland, Action Committee for Transit, Bike Maryland, Chesapeake Bay Foundation, Chesapeake Climate Action Network, Chesapeake Physicians for Social Responsibility, Clean Water Action, Communities for Transit, DC Environmental Network, Earthjustice, Environment America, Environment Maryland, Environment Virginia, Fairfax Advocates for Better Bicycling, Maryland Environmental Health Network, Montgomery County Sierra Club, Montgomery County Young Democrats, Natural Resources Defense Council, Piedmont Environmental Council, Sierra Club - Mount Vernon Group, Southern Environmental Law Center, Virginia Conservation Network, Washington Area Bicyclists Association*

April 11, 2014

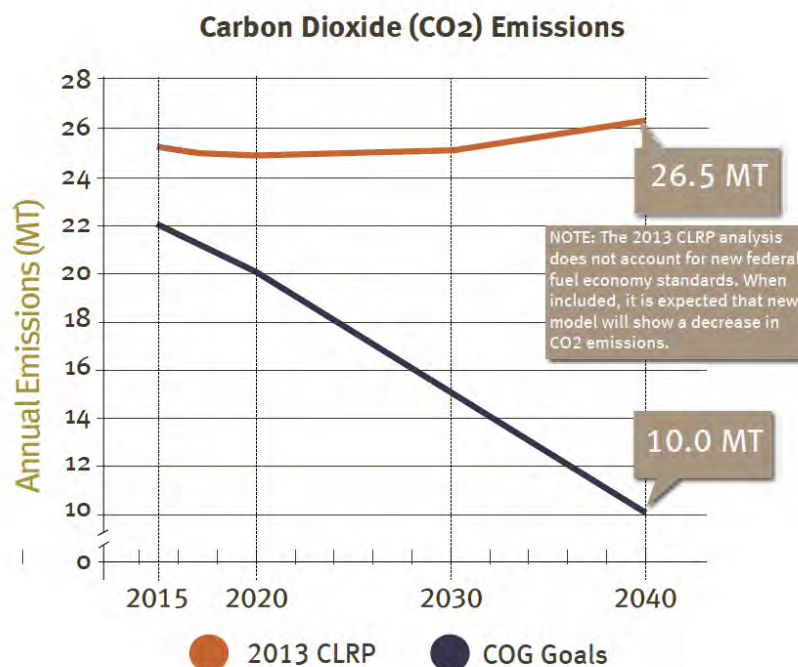
The Honorable Patrick Wojahn, Chair & Members of the Committee  
National Capital Region Transportation Planning Board  
c/o Metropolitan Washington Council of Governments  
777 North Capital Street, NW, Suite 300  
Washington, D.C. 20002

### **The Constrained Long Range Plan update must address regional climate change goals**

Dear Chairman Wojahn and Members of the Transportation Planning Board:

The undersigned organizations call on the National Capital Transportation Planning Board (TPB) to commit to full disclosure of the forecasted climate change impact of the 2014 Constrained Long Range Plan (CLRP), and to take action to align the CLRP with the region's climate change goals. One of the most important national and multi-national public policy issues of our time, climate change must be tackled by every city, county, region, state, and nation. Given that our region has already adopted important goals, it is past time to begin implementing them.

We have already exceeded the Earth's safe limit for atmospheric CO<sub>2</sub> concentration – 350 parts per million. Reducing CO<sub>2</sub> emissions to 80% below 1990 levels by 2050 is the scientifically supported goal to begin to bring CO<sub>2</sub> under control. In 2008, the Metropolitan Washington Council of Governments (MWCOC) committed to a more modest goal of an 80% reduction in total CO<sub>2</sub> emissions below a 2005 baseline by 2050. *Region Forward*, endorsed by the COG Board and local jurisdictions in 2010, confirmed the goal of 80% cuts by 2050, and added a goal of 20% reductions by 2020 below 2005 levels.



We understand that analysis of the 2013 CLRP revealed that the current set of projects, if built, would cause the region's vehicle miles of travel and thus transportation emissions to rise instead of drop, making no progress toward the necessary 80% reduction in CO2 emissions (see figure above). We understand that the models used for this analysis may change, but the analysis makes clear we are a long way (some five millions tons by 2020 and more than 20 million tons by 2050) from meeting the goals MWCOG and member jurisdictions have set for making essential reductions in greenhouse gas emissions.

At the same time, we could be doing more to meet our existing air quality conformity requirements to ensure we are meeting human health needs. The conformity process in the Washington region uses outdated mobile emissions budgets that have little relationship to either the new ozone standards or the more stringent ones that are likely to be adopted in the near future. The current conformity process does not support emissions reductions from the transportation sector sufficient to bring the region into attainment "as expeditiously as practicable," as is required by the Clean Air Act [42 USC § 7511(a)].

With EPA moving to regulate CO2 from power plants under the Clean Air Act, it is important to note that the agency's path to national standards has been made easier by the many state and regional efforts to bring down power plant CO2 emissions. To build momentum for a similar effort aimed at reducing mobile source CO2 emissions through transportation investments, we call on TPB to lead, to use and implement its recently adopted reports and plans (e.g. 2010 *Region Forward* plan, the 2010 "[What Would it Take](#)" report, and the 2014 [Regional Transportation Priorities Plan](#)) and to set a national example by ensuring our long-range transportation plan effectively fights climate change.

While fuel efficiency and fuel types are improving, there remains a large gap between transportation emissions forecasts and the region's climate goals. The MWCOG 2010 *What Would It Take Scenario* relies heavily upon stricter federal CAFE standards, but acknowledges that even the major cuts that could be realized by fleet improvements will fail to get us where we need to be. In order to get on track to meet our region's climate change goals, we must commit urgently to a dramatic increase in the region's share of trips taken by walking, cycling, and transit.

It's not unrealistic for us to achieve bold goals. Already today, 50% of all trips in DC are by walking, bicycling and transit, and while adding 83,000 residents over the past decade, the city saw vehicle registrations decline. The [Sustainable DC plan](#) goal for 75% of all trips in the District to be by walking, cycling, or transit by 2032 is very achievable.

Meanwhile, tens of millions of square feet of development in Arlington's two Metro corridors have helped to shift a majority of trips in those corridors to walking, bicycling, and transit, while not increasing traffic on surrounding local roads. Across the region 84% of new office construction is within 1/4 mile of a Metrorail station, and suburban leaders are embracing transit-oriented development and proposing new transit lines. New development now occurring or proposed around Metro stations in Prince George's and Montgomery Counties, and at the new Tysons stations in Fairfax County, will allow economic growth to occur while encouraging transit to effectively serve reverse-commuters. Not only do these approaches to transportation and growth reduce climate change emissions when compared with "business-as-usual" scenarios, they offer an alternative to driving in congestion and have been shown to have health and economic benefits.

It is time that the CLRP funding and projects be directed to supporting these positive trends and MWCOG's own goals. Specifically, we call on the TPB to take the following actions to ensure that the CLRP is on track to achieving the region's climate change goals:

- This year's CLRP update should include a complete reevaluation of all projects, and be amended to meet climate goals and the goals of the *Region Forward* plan and *Regional Transportation Priority Plan*. We note that the modeling which COG/TPB performs today, albeit using outdated mobile air emissions budgets, nevertheless reveals CO2 emissions along with VOCs, NOx, and PM 2.5; these emissions should be displayed and evaluated just as the other pollutants are discussed.

- Absent this necessary action, the TPB should vote to require a transparent assessment this year of whether or not the CLRP, and specific projects within the CLRP, meet climate goals, while also voting to mandate a full reevaluation and any necessary amendment of the CLRP in 2015 to achieve MWCOG's climate and sustainability goals.
- The CLRP should achieve significant reductions in per capita vehicle miles traveled as called for in *Region Forward* and the *Regional Transportation Priorities Plan*; significant increases in mode shares for transit, walking, bicycling, carpooling, and telecommuting; and significantly improved accessibility such that the overwhelming majority of trips within activity centers are by walking, biking and transit.
- TPB should remove the transit constraint through funding of the necessary Momentum/Metro 2025 projects and inclusion of other necessary transit projects sufficient to show robust progress in reducing greenhouse gas emissions from transportation and to reduce VOCs, NOX and PM2.5 emissions. Shifting more funding to transit could also eliminate the alleged need for the margin of safety above future air quality standards the staff asked you to approve last year.
- Finally, we urge TPB to work with MWCOG's staff on their "Beyond Conformity" project to bring together the political leadership necessary to determine a path forward for aligning our transportation plans with our region's climate change goals, and to become a national leader in regulating mobile sector CO2 emissions.

Given the Washington region's and the Chesapeake Bay's vulnerability to climate change, it is essential that we act now. Thank you for your attention,

Sincerely,

Stewart Schwartz, Coalition for Smarter Growth	Network
Deron Lovaas, Natural Resources Defense Council	Carol Silldorff, Bike Maryland
Lee Epstein, Chesapeake Bay Foundation	David Hauck, Communities for Transit
Sierra Club - Mt. Vernon Group	Timothy Ballo, Earthjustice
Dru Schmidt-Perkins, 1000 Friends of Maryland	Tina Slater, Action Committee for Transit
Nik Sushka, Montgomery County Young Democrats	Trip Pollard, Southern Environmental Law Center
Andy Fellows, Clean Water Action	Dan Holmes, Piedmont Environmental Council
Chelsea Harnish, Virginia Conservation Network	Mike Tidwell, Chesapeake Climate Action Network
Shane Farthing, Washington Area Bicyclists Association	Sarah Bucci, Environment Virginia
Chris Weiss, DC Environmental Network	Environment America
Bruce Wright, Fairfax Advocates for Better Bicycling	Joanna Diamond, Environment Maryland
Tim Whitehouse, Chesapeake Physicians for Social Responsibility	Ethan Goffman, Montgomery County Sierra Club
Rebecca Ruggles, Maryland Environmental Health	Emily Francis, Virginia League of Conservation Voters