

Date: August 13, 2021
From: Bill Pugh, Senior Policy Fellow
To: Transportation and Climate Initiative
Subject: Comments on TCI-P materials released June 10, 2021

The Coalition for Smarter Growth is a 24-year old non-profit working in the DC region, and we are the leading non-profit organization addressing where and how the region grows. Our Blueprint for a Better Region vision plan is for a revitalized city and a network of walkable, mixed-use, mixed-income, transit-oriented centers and corridors, linked by fast, frequent and reliable transit. These strategies are important components for reducing transportation-sector greenhouse emissions and have significant equity, livability, economic and further sustainability co-benefits.

The Coalition for Smarter Growth recommends the following additions to the draft TCI-P documents:

1. TCI-P Model Implementation Plan (MIP) for Low-Carbon Transportation

Reducing per capita vehicle miles traveled (VMT) is essential to sufficiently reducing on-road transportation GHG emissions to meet climate targets and achieving the goals of TCI-P in addition to encouraging cleaner fuels and vehicles. Therefore, we recommend jurisdiction VMT be included in the annual reporting:

- 6) Ensuring transparency and accountability regarding TCI-P implementation and progress toward achieving program goals, including through:
 - a. Air quality monitoring
 - b. Annual reporting on investments and equity
 - c. *Annual reporting on Vehicle Miles Traveled in TCI-P jurisdictions***

2. Proposed Strategies for Regional Collaboration

We are glad to see that more robust Mass Transit is included in the Proposed Strategies for Regional Collaboration. We recommend including the following additional strategies:

- a. New strategy related to MIP 6) Transparency and Accounting and to MIP 9) Advancing additional policies to help achieve the goals of TCI-P:

Strategy #6: Address Vehicle Miles Traveled (VMT) - track and report VMT (light duty, medium/heavy duty vehicles, urban/rural, per capita, total) for the TCI-P area and within individual states and MPO areas, and establish per capita VMT reduction targets in line with 2030 and 2050 climate targets. Transportation electrification, cleaner fuels, and higher fuel economy ICEs by themselves are not sufficient to achieve needed on-road GHG emissions cuts and other TCI goals. TCI-P needs to also track how it is contributing to less auto-dependence and fostering travel by more equitable, sustainable, and less costly modes of travel and reduction of travel demand.

- b. New strategy related to MIP 9) Advancing additional policies to help achieve the goals of TCI-P:

Strategy #7: Coordinate Land Use and Transportation. Support and coordinate Smart Growth land use policies, Transit-Oriented Development and Affordable Housing near Transit strategies to further lower emissions and increase co-benefits for equity, public health and sustainability.