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May 1, 2022

TPB Chair, Hon. Pamela Sebesky
National Capital Region Transportation Planning Board
777 North Capitol Street NE, Suite 300
Washington, DC 20002-4239

Dear TPB Chair Sebesky, TPB members, and other elected officials of the National Capital Region:

The following comments are provided by 35 organizations spanning the Greater Washington region. At the start of the Visualize 2045 process, in December 2020, the TPB board voted to craft a different plan that would better reflect the region's adopted policy. The solicitation guide for projects stated this clearly:

TPB requires its member agencies to prioritize investments on projects, programs, and policies to reduce greenhouse gas emissions, prioritize the aspirational strategies, and achieve COG's land use and equity goals as they submit their inputs for inclusion in the TPB's LRTP and TIP.

Before finalizing the draft list of projects, TPB members were briefed on the initial results of their [Climate Change Mitigation Study](#). They heard a clear consensus of national research and studies from this region that only by both shifting more travel to transit, biking and walking combined with adopting electric vehicles would they meet their climate targets

Then, a year ago, after looking at the proposed projects, the public overwhelmingly commented to TPB that the draft plan didn't do enough to meet our climate goals and needed to shift its investments to more sustainable transportation options with less emphasis on highway expansion.

Yet the TPB board members made no substantive changes, and the Visualize 2045 plan and its performance on important measures like greenhouse gas emissions and car dependence is largely the same as the last adopted plan from 2018. This is unacceptable.

There are other major developments since the previous plan that we would expect to see reflected in this plan's mix of projects and performance:

- The Council of Governments adopted a new climate plan in November 2020, with multiple transportation recommendations that are relevant to Visualize 2045 – and TPB even endorsed the plan's new 2030 climate target.
- The region's officials made new policy commitments to prioritize planning, development and infrastructure investment around transit stations. Representatives on COG adopted in 2019 the Regional Housing Targets, which seek to focus 75% of new housing near transit, and TPB last Fall voted unanimously to endorse the COG high-capacity transit station planning framework and directed its members to make it a priority.
- TPB board members heard the results of the agency's Voices of the Region scientific survey of 2,400 residents, in which 84% said they wanted their elected officials to consider climate change in planning transportation. The responses to other questions also made clear that residents want to prioritize clean transportation and options to driving and that your investments should reflect that.
- A significant lasting increase in telework is anticipated, reducing the purported need for many road widening projects that are premised on addressing peak-hour vehicle congestion.
- And if those weren't enough, the increasingly dire warnings of scientists on climate change – and effects experienced now in your communities – would be sufficient for decisionmakers to make real changes with some urgency.

However, almost no projects changed since the last plan: one major project had a change, one new major transit project was added, and one major new road project was added – a new arterial cutting through a forest. While this Visualize 2045 adds 100 more pages since the last one and devotes ink to worthwhile policy topics, it's the projects that matter and that are reflected in the performance:

- This Visualize 2045 makes no progress in reducing greenhouse gas emissions since the previous plan. Its forecast emissions levels in 2030 and 2045 are far above the region's targets and are essentially the same as those achieved by the 2018 plan.
- Despite more evidence on the impacts of induced demand, this plan devotes far too much to highway expansion, \$28.2 billion, versus only \$14.6 billion for expanding our transit, pedestrian and bicycle networks.

- These project priorities and the land use decisions of various TPB jurisdictions leave too many residents stuck driving long trips for daily needs. The plan only makes a very modest reduction in per capita driving, a 3% change by 2045, no different from the 2018 plan.¹
- The plan maintains and, in the case of Prince George's County and other areas, even worsens the east-west divide of inequitable job access. At a regional level the almost \$30 billion in road expansion leaves job access barely above current levels. While the transit-oriented land use and transit investments in the plan - albeit modest and below the levels the region needs - provide much more improvement in job access at a regional level, at much less cost. This transit-oriented development, infrastructure and housing strategy, which you endorsed, should be the core focus of the projects you are funding and would result in far better outcomes for access to jobs, equity, climate, and overall performance of the transportation network.
- There are worthwhile projects in this plan that we support. However, the plan also commits to adding nearly 900 new lane miles of highways and other major roads, which will result in billions of miles of additional driving per year - on top of that anticipated from population and job growth – and undermining your transit investments.
- Key findings of the TPB's climate study need to be more clearly articulated in the plan's text: that the region can achieve its climate targets but only by shifting more travel to walking, biking and transit; by reducing trip distances through better land use and more housing options near transit; and by rapid adoption of electric vehicles.

We call on you to make the necessary and feasible changes to this Visualize 2045 plan and set the stage for a more comprehensive overhaul of the plan by 2024:

1. Adopt a strong on-road transportation greenhouse gas reduction goal, and set specific, numerical targets for adopting electric vehicles (20 to 25% of vehicles on the road by 2030) and reducing per capita passenger vehicle miles traveled by 15 to 20% by 2030. Only by setting these informative goals, which are based on the findings of TPB's climate change study, will this plan be informative to our decisionmakers and hold them accountable.
2. Endorse the full slate of strategies that TPB's own climate study shows are necessary, including walkable, bikeable, transit-oriented land use; pricing parking and major roads; providing equitable commuter benefits that enable more sustainable travel; and investing in electric vehicle infrastructure and programs.

¹ For passenger vehicles, this translates to a 5.6% reduction in per capita VMT; however, TPB's climate study found that the region needs a reduction of 15-20% by 2030, in addition to quickly adopting electric vehicles, to achieve safe levels of greenhouse gas emissions.

3. Remove unnecessary and destructive highway expansion projects that induce more driving and sprawl.
4. Commit to a major regional study to develop actions that reduce the east-west jobs and housing divide, put more homes near transit, and more equitably and sustainably price our transportation system. TPB can begin the work as soon as this summer using the climate funding in its adopted FY23 Unified Planning Work Program.

This is the minimum that you must do now toward addressing the failings of the region's major plan for infrastructure investment.

Sincerely,

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