

SUBJECT: Comments on DRAFT Montgomery County Climate Action Plan
FROM: Washington Metropolitan Area Transit Authority
TO: Montgomery County

Overview

The Washington Metropolitan Area Transit Authority (“Metro”) supports Montgomery County’s efforts to establish priority collaborative actions to reduce community-wide greenhouse gas emissions (GHG). However, Metro is concerned that the draft Montgomery County Climate Action plan (CAP) does not fully consider or recognize public transportation’s role in supporting sustainable communities, reducing regional emissions, and increasing equity and resilience. Metro encourages Montgomery County to recognize the Agency as a partner in meeting the County’s GHG emission reduction goals by continuing to engage and partner in initiatives that could support the CAP and the overall County sustainability and resilience goals.

As a vital transportation link that occupies and connects communities, a major employer and purchaser of goods and services, and one of the region’s largest energy consumers, Metro’s investments and operational decisions change lives – our actions have immediate and significant impacts on health, racial equity, economic prosperity, and the overall social and economic wellbeing of the region.

Our commitment with the region led us to present draft sustainability principles to the Metro Board of Directors for consideration, last November. These principles recognize sustainability as a core value within Metro and acknowledge that sustainability can be the most cost-effective and beneficial way to improve performance and contribute to livable and equitable communities. These principles will allow Metro to help the region, and Montgomery County, to meet its sustainability and equity goals more effectively.

I. General Recommendations to the CAP

Transportation related emissions have increased in the County since the baseline 2005 inventory. In the inventory done in 2018, 42% of the total GHG emissions of the County came from the transportation sector and the projections presented in the CAP estimate that that share will increase. Metro operates a network of electric rail and buses that are key to slow and reverse that trend. Metro wants to be a partner in achieving the CAP equity, housing and GHG emission reduction goals.

- Metro encourages Montgomery County to recognize Metro’s role in reducing emissions by adding the following sentence: “Metro growth in ridership and service expansion have allowed for more compact development in Montgomery County, which has reduced the need for single-occupancy vehicle trips and reduced GHG emissions. Additionally, by promoting high quality, more intensive development on and near Metroowned properties, Metro reduces sprawl and traffic congestions and preserves open space for recreational use and watershed protection.”

- Metro suggests highlighting the importance to quantify the amount of countywide VMT reductions necessary to attain the GHG targets established in the CAP. Quantifying the needed VMT reductions will provide the county clear parameters for planning capital investments and transportation services. Establishing total VMT targets as expected outcomes in the CAP is a vital opportunity to help attain the county and the region's climate goals.

- Metro recommends making a stronger connection between current land uses and the ability to meet GHG reduction goals. The CAP aims to increase transit use, and pedestrian and bicycle trips by advancing BRT, TDMs, congestion pricing and other infrastructure. Metro recommends including actions related to land use changes, especially in suburban communities, development of Activity Centers as defined by [Visualize 2045 plan](#) to support reducing emissions, congestion and the general goal for 2030.

- The THRIVE 2050 plan, makes a connection between existing single family home land use: "As the county is running out of vacant land to support a low-density sprawl, our car-oriented transportation network is not designed to support a competitive economy in compact and Complete Communities with 15-minute living nor address the needs of households who cannot afford or do not want to own a car. The current pattern will continue to increase our transportation related greenhouse gas emissions and other impacts to sustainability." (p. 22)

Recommend including THRIVE 2050 language and making a stronger connection between necessary land use decision and the ability to meet GHG reduction goals.

Additionally, including those actions from the THRIVE 2050 plan could support a greater mode shift than the 13% goal established in the CAP (page 115).

Zero-Emission Fleet Planning

Metro connects the Washington region and Montgomery County through affordable, sustainable transportation every day. Metro provides interregional and vital connections through MetroRail and MetroBus. Ninety percent of the Metrobus fleet now consists of hybrid electric vehicles or vehicles that use alternative fuels, such as compressed natural gas.

Metro is moving towards a Zero-Emission bus fleet and has studied the complexity of that change beyond fleet purchase. Metro launched a zero-emission bus program to ensure readiness and a successful fleet transition as funding becomes available.

By converting to zero-emission bus service, Metro is helping regional partners such as Montgomery County, to reach sustainability goals and improve the customer experience (as outlined in the [Washington Area Bus Transformation Project](#) and the [Zero-Emission Bus Update](#)). We look forward to partnering with you in planning and investing for a Zero-Emission Bus Program that effectively operationalizes the CAP and advances your emission reduction goals.

In the following bullet points you can find some of the concrete steps that Metro is currently undertaking to advance Metro's Zero-Emission Bus program. We encourage Montgomery County to review and include some of them into the CAP as needed.

- Metro has already initiated and considers the market, infrastructure and policy prerequisites for success. Significant investments in energy infrastructure and new policies must be advanced by the region to enable Metro to take this next step
- Metro continues to incorporate 'electric bus ready' design in new bus garages currently under development.
- Initiated the development of a new Metrobus fleet plan, which will focus around zero-emission technology planning. Anticipated to conclude by the end of FY2021.
- Initiated the Electric Bus Test & Evaluation project, which will inform the future large-scale rollout of a zero-emission fleet. In addition to a \$4.2 million grant awarded by the FTA Low or No Emission Program, Metro anticipates releasing an RFP for two battery electric buses in FY2022.
- Metro is actively partnering with utilities to develop a new rate class to support cost-effective implementation of medium and heavy duty Zero-Emission Fleets.

II. Recommendations to CAP Actions

T-1 Expand Public Transit

Metro provides regional connectivity in Montgomery County by operating around 25 bus routes and 13 rail stations that serve Montgomery County. Metro is therefore a partner in meeting the county's GHG emission reduction goals, especially those related to expanding public transit and electrifying transit vehicles.

We would like to coordinate and partner with the county, in the implementation of this action and effectively identify service improvements and funding needs.

- Encourage Montgomery County to recognize Metro's role in reducing emissions by adding the following sentence: "Metro high frequency and reliable rail and bus service allows for more compact development in Montgomery County, which reduces the need for single-occupancy vehicle trips and GHG emissions. Additionally, by promoting high quality, more intensive development on and near Metro-owned properties, Metro reduces sprawl and traffic congestions and preserves open space for recreational use and watershed protection."
- Suggest including the essential coordination with WMATA and the Washington Area Bus Transformation Program to advance this action and identifying funding needs to achieve it.
- Metro suggests adding language to encourage increased density along existing transit corridors and access to opportunity.

- Metro suggests clarifying the methodology for the methodology used to calculate this metric: "currently, 75% of the residents in Montgomery County are within a half-mile walk to a transit stop."
- Suggest including text to indicate that a multi modal network support transit: "improving the transportation network to create a multimodal connected grid where possible, makes the transportation system more efficient and equitable."
- Metro recommends adding language to the CAP that encourages member jurisdictions to invest in and provide funding for clean energy infrastructure and new policies to support the actions outlined in actions T-1, T-5 and T-8.

T-5 Electrify Public Buses and School Buses

- Suggest including that this action would also support the transition to electric buses including WMATA's Zero Emission Bus Program and recommendations from the Zero Emission Bus Update, especially infrastructure requirements and engagement with utilities.

T-7 Zero-Emission Vehicles

- Suggest including in page 128: "The County also will collaborate with Metro to ensure that EV chargers for transit and private vehicles is available at Metro stations and facilities "
- Recommend revising language to "The County could also collaborate with the Washington Metropolitan Area Transit Authority (WMATA) to encourage travel and transit by EV by identifying charging infrastructure needs, financing and payment vehicles, and an implementation timeline."
- The CAP includes a goal that requires a 100% of private and public transportation options to be electrified or use other zero emission technologies by 2035. The pathway to achieve this goal relies 87% on electrification and 13% on mode shift. Metro suggests recognizing the role of WMATA for achieving this goal in the County and the challenges regarding funding for infrastructure, **regulations** and engagement with different stakeholders.

A-14: Update Floodplain maps

- The action suggests the need to update maps in all areas and increase their accuracy. Could you please share if Montgomery County has set up a timeline for this effort?

G-16: Conduct Climate Vulnerability Detailed Assessment

- Suggest including, if available, whether this effort will include the assessment of all or part of the transit infrastructure in the County.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact Metro's Elissa McDade at [REDACTED]