



October 16, 2023

Serena McIlwain
Secretary, Maryland Department of the Environment
1800 Washington Blvd., Baltimore, MD 21230

Paul Wiedefeld
Secretary, Maryland Department of Transportation
7201 Corporate Center Drive, Hanover, Maryland 21076

Re: Transportation Comments on Maryland's Climate Pathway

Dear Secretaries McIlwain and Wiedefeld,

The Transform Maryland Transportation Coalition writes to respond to the transportation sector components of Maryland's Climate Pathway report and provide input on transportation strategies to inform the state's final climate plan as required by the Climate Solutions Now Act of 2022.

The Maryland Department of Environment's Climate Pathway report acknowledges the critical function reducing Vehicle Miles Traveled (VMT) provides in achieving the state's climate targets and the positive environmental impact of incentivizing consumers to drive less and purchase smaller vehicles. The Climate Pathways report also references important strategies to meet these goals, including improving and expanding public transit, safe biking and walking infrastructure, funding for complete streets, bike-share programs, e-bike and low-speed vehicle rebates, mixed-use development, transit-oriented development, and parking reform. Many of these strategies have the added co-benefits of improving mobility by increasing access to jobs, education, food, healthcare, and recreation. However, it is disappointing that the additional policies modeled in the draft report only yielded a 0.67% reduction in VMT between 2025 and 2030 and annual average VMT growth of 1% between 2020 and 2030, clearly inadequate for enabling Maryland to achieve its greenhouse gas emission reduction goals.¹ Moreover, it is hard to dispute the presented numbers, since the Climate Pathway Report does not identify the specific VMT reduction measures that were modeled.

We are glad to see critical transportation electrification policies in the Climate Pathway Report, including the Advanced Clean Cars II, Advanced Clean Trucks, and the Advanced Clean Fleets

¹ [Maryland Climate Pathway technical appendix](#) (page 15)

regulations as well as a goal for 100% of new bus sales to be electric by 2025 in Maryland's draft Climate Pathways analysis. To support achievement of that goal, the state should identify and model additional state policies that will make electric vehicles and infrastructure sufficiently accessible to communities of color, rural communities, low-wealth consumers, people with disabilities, rental and other residential communities without deeded parking.

We ask that the Maryland Department of Environment (MDE) work with the Maryland Department of Transportation (MDOT) to prioritize incorporating the following objectives into its final climate plan:

1) **Prioritize transportation projects that reduce greenhouse gas emissions**

Fix transportation planning modeling and project impact analysis to emphasize a state of good repair policy that prioritizes alternatives to highway expansion, accounts for induced demand, and requires accounting of (i) greenhouse gas emissions and (ii) VMT impacts of proposed highway projects. Any anticipated increases in GHG or VMT from that project need to be offset by other transportation projects that would reduce GHG and/or VMT by the same amount or more (e.g., more public transit, bike and pedestrian infrastructure).

2) **Reduce Vehicle Miles Traveled by 20% by 2030**

The Maryland Department of the Environment, in conjunction with the Maryland Department of Transportation, should **develop a VMT reduction strategy no later than December 2025 that identifies and models policies, programs, and projects that will lead to a 20% per capita VMT reduction below 2019 levels by 2030**. Strategies, including public transit, transit-oriented development, cycling and pedestrian infrastructure, and transportation demand management, that would lead to a mode shift from single-occupancy vehicles and freight trucks to public transit, freight rail, cycling and walking are listed in the recommendations attached and should be included in the VMT reduction strategy.

3) **Adopt binding targets and programs to transition to electric light, medium and heavy-duty vehicles**

Adopt the following transportation electrification schedules. Maryland should take actions outlined in the recommendations to ensure the charging infrastructure, utility transmission, distribution and storage infrastructure, and funding mechanisms are in place to ensure an equitable and smooth transition to electric or other zero-emission vehicles.

- a) Provide local governmental entities the funding and technical assistance needed to ensure that starting in 2025 the procurement of all new transit and school buses consist of only zero-emission vehicles.
- b) Require that all sales of medium- and heavy-duty vehicles in the state are zero-emission as of 2036.
- c) Electrify all MARC trains by 2035 and work with federal leaders to set requirements for CSX and Norfolk Southern train lines to be all-electric by 2035.

MDE and MDOT should work with the Maryland Energy Administration (MEA), Maryland Department of Planning (MDP), Department of Housing and Community Development (DHCD) and

other state and local agencies to incorporate the transportation policies, projects, and strategies to meet the state's greenhouse gas goals that are outlined in the attached recommendations report.

Thank you for the opportunity to comment on Maryland's Climate Pathway Report. We look forward to working with you to build a robust, transformational, equitable and sustainable transportation system that helps meet our climate targets and serves all Marylanders.

Sincerely,

Transform Maryland Transportation Coalition

Member Signatories

Amalgamated Transit Union Local 689

Anna Ellis

ArchPlan Inc

Audubon Mid-Atlantic

Bikemore

Central Maryland Transportation Alliance

Ceres

Climate Reality Greater Maryland

Climate XChange Maryland

Coalition for Smarter Growth

Coltura

Elders Climate Action Maryland

Elizabeth Bunn

Environmental Defense Fund

Environmental Justice Ministry Cedar Lane Unitarian Universalist Congregation

Fix Maryland Rail

Labor Network for Sustainability

Maryland LCV

Maryland Legislative Coalition

Maryland Sierra Club

Policy Foundation of Maryland

Progressive Maryland

St. Vincent's Green Team

Strong Towns Baltimore

Transit Choices

Union of Concerned Scientists

Unitarian Universalist Legislative Ministry of Maryland

Washington Area Bicyclist Association