



National Association of  
City Transportation Officials

120 Park Avenue, 21<sup>st</sup> Floor  
New York, NY 10017  
nacto@nacto.org

**Corinne Kisner**  
Executive Director

[www.nacto.org](http://www.nacto.org)

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Climate Crisis

The Honorable Garrett Graves  
**Ranking Member**  
House Select Committee on the Climate  
Crisis

November 22, 2019

Chair Castor, Ranking Member Graves, and Members of the Select Committee:

Transportation is the single largest source of U.S. greenhouse gas emissions, at 28 percent of total emissions. Light-duty vehicles, like the personal vehicles most people use for daily trips, make up 60% of emissions from this sector. Averting the worst impacts of climate change requires nothing less than rapidly decarbonizing our transportation system. Congress must lead this effort by reforming the federal surface transportation program to facilitate mode shifts on a wide scale.

As a membership organization representing 81 U.S. cities and transit agencies, NACTO has unparalleled insight into the work cities are doing to cut greenhouse gas emissions and expand low carbon modes of travel. Our membership base consists of 46 percent of the total U.S. population and 57 percent of the total 2016 U.S. GDP. Over the past year, NACTO has served as a partner in the American Cities Climate Challenge, an initiative to accelerate climate action in 25 of America's largest cities. In this capacity, NACTO provides cities with technical assistance to develop high-quality infrastructure that prioritizes walking, biking, and transit.

This ongoing work informs the following individual and structural recommendations to meet net-zero emissions by 2050.

**Background**

Our carbon-intensive transportation system is the result of several decades of public policy structured to move large numbers of gas-powered vehicles at high speeds over long distances above all other goals. In addition to killing nearly 40,000 people per year and splintering countless urban communities, this system and the policies enabling it have devastating environmental impacts. National transportation policy must promote reductions in greenhouse gas emissions from transportation while addressing the safety and justice shortcomings of our current policy framework. This can be achieved by reducing car use, supporting low-carbon modes, and incentivizing walkable land use patterns.

Shifts to active transportation and transit can be accomplished quickly and at relatively low costs—a key distinction from top-down, technologically complex climate solutions such as subsidizing the electric vehicle industry or developing autonomous vehicles. Americans are driving more than ever, with annual vehicle miles traveled (VMT) reaching a new high of 3.2 trillion in 2018. This increase effectively negated the improvements in fuel economy made in the past 20 years.

<sup>1</sup> Absent policy mechanisms and incentives for people to drive less, emissions from automobiles will continue to increase in the next few years, at a time when it is critical to *reduce* emissions from the transportation sector. Reducing the number and length of trips, through a set of proven strategies at the city level within a short timeframe, must be a component of any decarbonization plan.

The following new and revised policies concerning transportation design, improvements to transit, and demand management strategies can make this a reality.

### **Expand eligibility for tolling and congestion pricing on existing roadways.**

Congestion and productivity lost to traffic has hit an all-time high in the U.S.. Drivers spend an average of 97 hours per year stuck in traffic and the total cost of lost productivity and fuel waste reached over \$300 billion in 2017, the most recent year for which data is available.<sup>2, 3</sup>

Internationally, cordon pricing, or charging a fee to enter a specific zone or zones of a city, has enabled cities to cut congestion and improve transit and active transportation infrastructure. Learning from cities such as Stockholm and London, which charge a fee to enter the city center, American policymakers can enact similar charges to cut traffic in the most congested areas of cities, while also lowering carbon emissions.

In addition to producing the most significant results for congestion mitigation and greenhouse gas emissions reductions compared to other forms of road pricing, congestion pricing is a versatile tool that can be tailored to meet very specific policy goals. Cities can establish cordon zones based on land use or existing congestion levels. The price of tolls can stay flat or vary based on time of day. Cordons can also focus on specific vehicle types, targeting high-polluting vehicles or large trucks. Since first enacted in London in 2003, congestion pricing cut emissions by 16 percent with further reductions in ozone and particulate matter. Singapore, where an extensive cordon pricing system has been in place since 1998, saw a 15 percent reduction in greenhouse gas emissions even as population grew by over 44 percent during the same period.<sup>4</sup>

To fully realize the potential of pricing as a policy tool, Congress must eliminate the existing prohibition on tolling on freeways and allow road operators to institute user fees without Federal approval. In addition to proven climate and traffic benefits, congestion pricing can raise much-needed local revenue. States and cities need the authority to price corridors and zones and dedicate the resulting revenue towards expanding and improving transportation alternatives such as transit, walking, and biking. The thoughtful application of congestion pricing funds is essential for achieving sustainable emissions reductions and ensuring equitable outcomes.

### **Remove barriers to designing streets for low-carbon modes.**

Streets make up more than 80 percent of public space in cities; they're one of the largest assets a city controls and present one of the biggest opportunities to combat climate change. State and local

transportation agencies can redesign their streets to prioritize low-carbon modes like walking, biking, and transit using tools they already have access to: control of the right of way, engineering expertise, and basic materials like paint and pavement. Street design shapes behavior and can accelerate the adoption of low-carbon transportation systems. More people are encouraged to bike or take transit when there are dedicated facilities in place, such as high-quality bikeways and transit lanes that allow them to travel safely and reliably. Dedicating federal resources to scale up these efforts can accelerate the transition to a low-carbon transportation network.

Cities around the country are already undertaking redesign streets and seeing shifts away from individual car trips towards transit. In San Francisco, the creation of rapid transit lanes in the Mission District in early 2016 led to an 11 percent increase in ridership.<sup>5</sup> A similar intervention on Webster Avenue in the Bronx in New York City resulted in a 25 percent increase in ridership between 2013 and 2014.<sup>6</sup> The City of Seattle saw an even more dramatic mode shift: Bus and transit investments made between 2010 and 2016 resulted in increasingly smaller shares of commuters driving to work. Even as Seattle's population and the number of jobs continues to grow, the percentage of solo drivers commuting downtown declined from 35 to 25 percent within a seven-year period.<sup>7</sup> This model is also viable in lower density cities. In Austin, Texas, ridership on the Capital Metro bus system increased dramatically since 2018 following the rollout of several bus priority lanes and new lines.<sup>8</sup> In total, ridership increased 11 percent between 2018 and 2019.<sup>9</sup>

The number and total share of bicycle trips are also growing across the country. Bike commuting continues to grow, increasing by 62 percent in the 70 largest U.S. cities since 2000.<sup>10</sup> Bike share systems are largely responsible for this trend: since 2010, 123 million trips have been taken on bike share bikes in the U.S.. Ridership grew exponentially within this period with fewer than 2 million trips in 2010 and 35 million in 2017. The city of Honolulu is representative of the impact a new bikeshare system can have on a city's ridership: the number of bicycle trips taken in Honolulu increased 194 percent from 2016 to 2017. Notably, bikeshare systems can only be successful if cities and states invest in high-quality bike infrastructure and safe places for cyclists of all ages and abilities to ride. The cities that have seen the greatest increases in the share of bicycle commuters- Portland, Minneapolis, and Washington, DC- have all built extensive bicycle networks in the past eight years.<sup>11, 12</sup>

These projects represent only a small fraction of the street design and mode shifts possible with strategic policy changes. Of the hundreds of millions of vehicle trips occurring every day, two-thirds are under six miles.<sup>13</sup> The federal government can accelerate improvements to streets by modernizing antiquated design guidance and administrative requirements. Under existing environmental review processes, new projects are graded based on their impact on vehicle delays through a measure known as level of service (LOS). Some jurisdictions, most notably California, replaced LOS with a measure on how many vehicle miles traveled (VMT) a project adds with the intention of reducing driving. Other jurisdictions should follow suit and remove vehicular LOS from the environmental review process and the project rating process, and adopt project rating systems that prioritize public and private investments that reduce VMT and increase the share of low impact travel modes such as public transit, walking, and cycling.

Additionally, the federal government should categorically exempt bikeway, pedestrian, and transit projects from NEPA reviews. Active transportation and transit are inherently good for the environment but project reviews by multiple agencies create exponential delays in project delivery and increased costs, often without changing the underlying project in any significant or positive way. As these projects do not widen roadbeds or highways and decrease the impacts of motor vehicles, the federal government should eliminate duplicative reviews. Regulations and design standards adopted at the local level also determine the viability of non-car modes as a means of transportation. Bans on the construction of multifamily housing, strict parking minimums, or minimum lot sizes, effectively price out low-income households and generate low-density land use patterns that make efficient transit service impossible. Parking requirements come with a pronounced environmental cost- because abundant free parking encourages solo driving over all other modes, the environmental costs of parking can potentially exceed that of cars.<sup>14</sup> The Federal government should incentivize equitable zoning practices by rewarding communities that enact such policies, or withholding transportation funds from communities that retain exclusionary zoning and burdensome parking regulations.

### **Prioritize and expand transit.**

Transit is the lifeblood of city transportation, especially in those taking climate action. It allows urban areas to grow without increasing congestion or emissions from personal cars. Dedicated transit lanes move 4,000 to 8,000 people per hour, as opposed to personal vehicles, which move 600 to 1,600 in the same amount of space. Transit investments can dramatically improve mobility while minimizing transportation's carbon footprint. Despite these benefits, many of our mass transit systems are in crisis. Decaying transit infrastructure and service cuts across the country are failing riders while undermining local and regional economies. On the other end of the spectrum, cities including Seattle, WA, Columbus, OH, Austin, TX, and Houston, TX have bucked national trends and increased ridership over the past three years through strategic investments and service improvements.<sup>15</sup> Cities and transit agencies need a supportive federal partner to restore and expand frequent all-day transit service, funding transit expansion, and reforming the federal transit program to meet strategic climate goals.

Making up over half of miles traveled on transit, improving bus service is a critical step to achieve mode shifts.<sup>16</sup> Today, many metro areas are served by bus networks designed to facilitate rush-hour trips to a city's central business district. Such systems are inconvenient for the majority of trips people rely on transit to make. Most bus systems are also burdened with antiquated fare payment systems, where the time it takes riders to pay fares dramatically delays service. The dedication of resources for transit agencies to study and implement changes such as bus network redesigns, bus facility improvements, and off-board fare payments to enable boarding through all doors and cut wait times can dramatically improve service. In Houston, a network redesign directly contributed to an 11 percent jump in ridership between 2014 and 2015.<sup>17</sup> Internationally, Paris, Oslo, Copenhagen, and Berlin have successfully implemented all-door boarding.<sup>18</sup> Rewards for transit agencies that run frequent, all-day service while meeting maintenance goals can contribute to additional improvements in transit service.

The Federal government's role in transit is overwhelmingly focused on capital construction and providing funding for new projects. Expanding transit systems to reach more Americans is an essential step towards decarbonizing transportation but new projects must be selected and sited to maximize ridership quickly. By growing programs like the Pilot Program for Transit-Oriented Development Planning, Congress can support comprehensive planning to improve transit access at the local level while making walking and biking viable and attractive across the country. Congress can also take advantage of recent advances in battery technology and vehicle efficiency to electrify transit fleets. In the past four years, the Low and No-Emission Grant Program has disbursed \$277 million in small grants and enabled hundreds of transit agencies to partially upgrade their fleets. Congress and U.S.DOT should expand funding for this program to scale up the transition to clean vehicles among transit agencies.

The climate benefits of transit, walking, and biking cannot fully be realized through the policies enumerated here alone. Decarbonizing the transportation sector will require a rebalancing of priorities at the federal level. The federal surface transportation program devotes \$40 billion per year to roads and highways. Unchecked, indefinite expansion of roadways is incompatible with this committee's stated goal of meeting or exceeding net-zero emissions by mid-century. NACTO urges Congress to reconsider the distribution of surface transportation formula funds in order to reward progress on policy objectives in line with the values of safety, equity, and sustainability.

The scale of the climate crisis demands bold, swift action on the parts of government at all levels. NACTO and our member agencies look forward to collaborating on legislative efforts to make the vision of a carbon neutral transportation system a reality.

Sincerely,



Corinne Kisner  
Executive Director, NACTO

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<sup>1</sup> [www.citylab.com/transportation/2019/09/electric-vehicle-climate-carbon-emissions-impact-solution/598453/](http://www.citylab.com/transportation/2019/09/electric-vehicle-climate-carbon-emissions-impact-solution/598453/)

<sup>2</sup> [www.fhwa.dot.gov/pressroom/fhwa1704.cfm](http://www.fhwa.dot.gov/pressroom/fhwa1704.cfm)

<sup>3</sup> [inrix.com/scorecard/](http://inrix.com/scorecard/)

<sup>4</sup> [www.tstc.org/reports/A-WAY-FORWARD-FOR-NEW-YORK-CITY-2017.pdf](http://www.tstc.org/reports/A-WAY-FORWARD-FOR-NEW-YORK-CITY-2017.pdf)

<sup>5</sup> [www.sfmata.com/blog/muni-skys-limit](http://www.sfmata.com/blog/muni-skys-limit)

<sup>6</sup> [web.mta.info/mta/planning/sbs/docs/WebsterAveSBS-ProgressReport-2014.pdf](http://web.mta.info/mta/planning/sbs/docs/WebsterAveSBS-ProgressReport-2014.pdf)

<sup>7</sup> [commuteseattle.com/wp-content/uploads/2018/02/2017-Commuter-Mode-Split-Survey-Report.pdf](http://commuteseattle.com/wp-content/uploads/2018/02/2017-Commuter-Mode-Split-Survey-Report.pdf)

<sup>8</sup> [austintexas.gov/sites/default/files/files/TransitPriorityLanesBrochure\\_final.pdf](http://austintexas.gov/sites/default/files/files/TransitPriorityLanesBrochure_final.pdf)

<sup>9</sup> [capmetro.org/ridership-stats/](http://capmetro.org/ridership-stats/)

<sup>10</sup> [bikeleague.org/sites/default/files/Bike\\_Commuting\\_Growth\\_2015\\_final.pdf](http://bikeleague.org/sites/default/files/Bike_Commuting_Growth_2015_final.pdf)

<sup>11</sup> [www.ci.minneapolis.mn.us/bicycles/](http://www.ci.minneapolis.mn.us/bicycles/)

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<sup>12</sup> [www.portlandoregon.gov/transportation/article/407660](http://www.portlandoregon.gov/transportation/article/407660)

<sup>13</sup> [www.energy.gov/eere/vehicles/articles/fotw-1042-august-13-2018-2017-nearly-60-all-vehicle-trips-were-less-six-miles](http://www.energy.gov/eere/vehicles/articles/fotw-1042-august-13-2018-2017-nearly-60-all-vehicle-trips-were-less-six-miles)

<sup>14</sup> [www.accessmagazine.org/fall-2011/parking-infrastructure-environment/](http://www.accessmagazine.org/fall-2011/parking-infrastructure-environment/)

<sup>15</sup> [transitcenter.org/wp-content/uploads/2019/02/TC\\_WhosOnBoard\\_Final\\_digital-1.pdf](http://transitcenter.org/wp-content/uploads/2019/02/TC_WhosOnBoard_Final_digital-1.pdf)

<sup>16</sup> [www.apta.com/wp-content/uploads/Resources/resources/statistics/Documents/FactBook/2018-APTA-Fact-Book.pdf](http://www.apta.com/wp-content/uploads/Resources/resources/statistics/Documents/FactBook/2018-APTA-Fact-Book.pdf)

<sup>17</sup> [nacto.org/case-study/metro-bus-network-redesign-houston/](http://nacto.org/case-study/metro-bus-network-redesign-houston/)

<sup>18</sup> [nacto.org/wp-content/uploads/2017/02/NACTO\\_Better-Buses\\_Boarding.pdf](http://nacto.org/wp-content/uploads/2017/02/NACTO_Better-Buses_Boarding.pdf)