Association for Commuter Transportation

December 16, 2021

Ms. Juli Huynh
Director, Office of Policy Coordination and Development
Office of the Assistant Secretary for Transportation Policy
c/o Docket of Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE, Room PL-401
Washington, D.C. 20590-0001

RE: Document # 2021-26266

Dear Director Huynh:

The Association for Commuter Transportation (ACT) supports a more efficient and effective transportation system that prioritizes the use of Transportation Demand Management (TDM) strategies to reduce congestion and carbon emissions with innovative technologies that increase connectivity and mobility. ACT strives to get the most out of our existing infrastructure network while improving the lives of commuters by reducing congestion and supporting the development of accessible and efficient transportation options for all. As the US Department of Transportation looks to update its strategic plan, ACT strongly advises you to incorporate forward-looking TDM goals that can transform and improve the American public's transportation systems while further reducing congestion and address climate change.

In 2017, 29% of total U.S. Greenhouse Gas emissions originated from transportation. In fact, the transportation sector represents the largest source of greenhouse gas emissions in the United States. The Environmental Protection Agency found that, "[t]he largest sources of transportation greenhouse gas emissions in 2017 were passenger cars (41.2 percent); freight trucks (23.3 percent); light-duty trucks, which include sport utility vehicles, pickup trucks, and minivans (17.5 percent)."[1] The EPA found that, "[i]n terms of the overall trend, from 1990 to 2017, total transportation emissions increased due, in large part, to increased demand for travel. The number of VMT (Vehicle Miles Traveled) by light-duty motor vehicles (passenger cars and light-duty trucks) increased 45.1 percent from 1990 to 2017, as a result of a confluence of factors including population growth, economic growth, urban sprawl, and periods of low fuel prices."

In 2020, the Climate Crisis Action Plan Report submitted by the House Select Committee on the Climate Crisis, identified TDM as a strategy to be used to reduce greenhouse gas emissions and provide households with alternatives to driving.

[1] Environmental Protection Agency, 2019, Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2017, EPA 430-R-19-001, PG 2-29 https://www.epa.gov/sites/production/files/2019-04/documents/us-ghg-inventory-2019-main-text.pdf

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As travel demand continues to increase, the United States must embrace TDM policies that focuses on creating a multimodal transportation system that moves people. Providing people with real options will help reduce overall congestion, resulting in fewer greenhouse gas emissions from the transportation sector. US DOT should look to develop policies and programs that bring together and leverage all entities delivering transportation solutions. Congestion is a challenge that faces both the public and private sector and future policy should enable private sector involvement in developing and deploying solutions.

On behalf of our 1,300 members across the country, and representing city/state governments, Metropolitan Planning Organizations (MPOs), Regional Transit Agencies (RTAs), major employers, universities, NGOs, transportation service providers, and other stakeholders, we welcome the opportunity to provide the following recommendations for your consideration.

It is essential that the US DOT prioritize the inclusion of transportation demand management (TDM) and TDM strategies within its strategic goals. The Definition of TDM, as developed by ACT and included in the House of Representatives passed INVEST in America Act, is "the use of strategies to inform and encourage travelers to maximize the efficiency of a transportation system leading to improved mobility, reduced congestion, and lower vehicle emissions." The Definition of TDM strategies, developed by ACT and also included in the INVEST in America Act, is "the use of planning, programs, policy, marketing, communications, incentives, pricing, and technology to shift travel mode, routes used, departure times, number of trips, and location and design workspace or public attractions."

Our proposed inclusion of transportation demand management for your consideration would be part of the *Economic Strength and Global Competitiveness* goal within the *System Reliability* objective. ACT recommends that it read, "System Reliability: Improve system operations to increase travel time reliability and incorporate system efficiencies through the widespread adoption of transportation demand management to address congestion and travel bottlenecks."

The Association for Commuter Transportation appreciates your attention to this urgent matter. We look forward to working with you to meet this challenge.

Sincerely,

David Straus

Executive Director
Association for Commuter Transportation