Climate Action Council Draft Scoping Plan
-Comments on Chapter 11. Transportation -

Submitted by:
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Overall Comments:

In general, the chapter fails to prioritize the need to reduce car dependency as a critical component of reducing emissions from transportation. It is not enough to shift to electric vehicles. We also need for people to drive less (regardless of fuel used). We need to have more people choosing active and shared transportation options and transit. This plan, in order to be effective, must make reduced car dependency the absolute main thrust of its strategies.

The need to have energy efficient alternative modes of transportation goes hand-in-hand with New York State's renewable energy goals. Efficiency, in conjunction with electrification, equates to less electricity needed overall to sustain the state's energy needs. This focus on efficient active and shared transportation instead of personal vehicle electrification also means that the state can more quickly transition to 100% renewable energy by reducing the potential electricity demand from the transportation sector. Personal electric automobiles require more electricity and therefore a greater installed renewable energy capacity than their electrified transit, biking, and walking counterparts. Therefore, moving towards a greater mode share for walking, biking, shared transportation, and transit should be a key focus of the state's climate action and renewable energy strategy.

The rail component of transportation is conspicuous for its absence in the transportation chapter. Rail is rarely mentioned. Rail is identified as a key part of the plan, but the chapter does not go into any detail on the path forward. The chapter does not reflect the importance of existing rail services or the tremendous potential it holds as a component of an efficient, low-emission transportation sector for New York state.

<u>Comments by Section</u>

Key Stakeholders
Comment:
Include the following key stakeholders-
- Metropolitan Planning Organizations
- local civic groups and non-profits working to promote progressive transportation

11.1 State of the Sector

Overview

Text (Pg. 94):

"The challenge is how to balance growth, facilitated by transportation, while mitigating harmful GHG emissions."

Text (Pg. 94):

"The challenge of achieving the Climate Act requirements should be approached strategically and with an eye toward recognizing the opportunity and delicate balance of facilitating transportation's role in economic growth with the need to address adverse community, environmental, and human health impacts."

Text (Pg. 94):

"To fully implement the requirements of the Climate Act while maintaining economic competitiveness, the State needs the full support of complementary national, regional, and local strategies."

Comment:

The plan should not be based on the false dichotomy in which growth/economic competitiveness requires more motor vehicles and therefore more energy usage, while active and shared transportation and transit options have social and environmental benefits but are not associated with encouraging growth. The focus needs to be on a new positive kind of growth where more goods and people are moved more efficiently and with less energy, and one where alternative modes and transit need to play a more critical role. Growth does not have to be in conflict with climate goals.

Investing in alternative modes and divesting from motor vehicle infrastructure should not be viewed as an economic strain resulting in hardship. If this is the underlying assumption of this plan, then this is a major problem and misconception that will hinder the plan's effectiveness. It sets up a situation in which there is a two-tiered transportation system in New York State; one that ensures economic competitiveness (aka highways, truck volumes, motor vehicle speed, access, & parking) and one that deals with the environment and social well-being (aka active and shared modes and transit). This is a faulty premise; growth does not inherently equate to more car traffic, more motor vehicle VMT, and more of the associated GHG emissions.

We need to focus on a new kind of growth, one that focuses on the growth of low/efficient energy transportation modes: i.e. electrified train mode share growth (both long-distance and local passenger and freight rail), active transportation growth (for all trips less than 5 miles long regardless of trip purpose & local freight delivery), shared transportation (car share, bike share, etc.) and transit system growth.

If we change the definition of growth to focus on these modes, then growth will not conflict with climate goals. However, if we focus on motor vehicular growth as an unavoidable externality, then our sustainable transportation goals will always be in conflict with economic ones.

Vision for 2030
Text (Pg. 96):
"Because a large portion of vehicles on the road are expected to still use internal combustion engines in 2030, particularly in the MHD vehicle classes, one path to achieving 2030 emissions reduction targets would include strategies to make limited use of renewable diesel and other lower-carbon fuels to replace diesel in existing internal combustion engine vehicles until the transition to zero emission vehicles is complete."
Comment:
Why should we continue to finance and encourage any fossil fueled ICE vehicle use? These funds could be put to better use expanding alternative fuel technologies, ie. hydrogen, electric, as well as alternatives like rail networks and other alternatives (ie. electric urban freight delivery such as cargo bikes and delivery van/trucks), which can be electrified far ahead of schedule when compared to market trends. This last part is critical to how the plan should be built; we have the technology to automate and electrify many aspects of the public transit system, including passenger and freight rail. There needs to be a focus on what we can do right now and less on technologies that may or not become commonplace years and years from now.

Vision for 2050
Text (Pgs. 96-97):
Overall Comment:
The Vision statement illustrates the complexity of the transportation system and the need to act on multiple areas simultaneously to address the challenge of decarbonizing the sector. There needs to be a hierarchy of priorities established in this vision.
1. Walking/Pedestrian Infrastructure
2. Bicycling (infrastructure and programs)
3. Public Transit Bus/Rail
4. Freight
5. Shared transportation programs and initiatives (car sharing, micromobility sharing, ride sharing)
6. Private vehicles and associated infrastructure

Comment:
There is no mention about the use of rail/high-speed rail for regional and intercity travel in the 2050 Vision. This needs to be addressed and given priority in this document.

11.2 KEY SECTOR STRATEGIES
Transitioning to Zero-Emission Vehicles and Equipment

Text (Pg. 97-98):
*"**Existing Sectoral Mitigation Strategies***
New York uses less energy per capita for transportation purposes than any state in the nation due in large part to the extensive investment and utilization of public transportation services and compact land use patterns in the State's larger urbanized areas. While these services help the State avoid more than 17 million metric tons of GHG emissions each year, much more needs to be done to meet the Climate Act GHG emission reduction requirements. ***There are currently over 80,000 EVs on the road in the State and the number is rapidly growing, with sales in the first half of 2021 (approximately 18,000 EVs) exceeding the full-year sales in any previous year."***
Comment:
This segment starts off with a good point about the importance of land-use patterns and alternative low-energy forms of transportation, but then pivots back immediately to EVs. The last sentence (bold) is inappropriate for this paragraph. This is not the place to highlight one factoid about EVs without any context. We suggest deleting the sentence and possibly using it in one of the bullets in the list of ongoing strategies to promote transportation emission reductions that follow the paragraph.

T1. Light-Duty Emission Vehicle Adoption-Components of the Strategy-fourth bullet (Invest in and remove barriers for ZEV charging and fueling infrastructure)
Comment:
The longer range in many light duty EV models will result in most privately owned, household vehicles being charged at home overnight with minimal demand for other charging at work, shops, etc. Facilitating the installation of home chargers through helpful regulations (or deregulation), standardization of technology and subsidies for at-home chargers will help ease the transfer of households to EVs.

Text (Pg. 103):
"Incentives for hydrogen fuel cell vehicles may be needed for longer, as they are expected to take longer to enter the market in significant quantities."
Comment:
How much focus should be given to hydrogen fuel technology for land-based transport when the market seems to be heavily shifting away from fuel cells to BEVs in this area? Is it worth it to dedicate money towards this technology that's bucking market trends when it could be put towards battery electric technologies? Care must be taken that by trying to accommodate every single sustainable fuel alternative, we miss attaining the full potential and benefits of any of them. At some point it may be best to focus on battery technology for land vehicles (LDVs and MDVs) and fuel cell/biofuel technologies for large vehicles, airplanes and large maritime vessels. Hydrogen is more economical when its production and distribution is highly concentrated in areas like airports and seaports.

Enhancing Public Transportation and Mobility Alternatives

Text (Pg. 107):

"For the purposes of the scoping discussion, public transportation includes but is not limited to transit, micro-transit, shared mobility, and longer distance passenger rail services."

Comment:

This is the first mention of passenger rail service in this transportation chapter. This mode needs to have an entire section dedicated to outlining the role that electrified rail services will play in sustainable transportation. There is practically no further mention of it for the rest of the document. This is one of the best sustainable transportation tools that we have at our disposal and yet it gets almost zero consideration.

T3. Community-Based Service Enhancements

Comment:

The text in this section starts by identifying MTA issues. Makes it sound like this is a plan for the MTA region only. Right away the rest of the state feels left out. Please address statewide concerns with the understanding that the NYC Metro has unique requirements.

This section of the plan is titled *Enhancing Public Transportation and Mobility Alternatives.* However, the text in section T3 is almost exclusively about public transportation. The public transportation sector does need attention and continued support. However, public transportation is well established with transit agencies, staff, dedicated funding lines, etc.

The Mobility Alternatives sector is nascent and holds tremendous potential. A significant number of trips statewide are under 3 miles in length (the numbers are higher within urban areas) and, with adequate support, could transition to walking, bicycling, other small e-vehicles (such as scooters), all in synergy with transit. The plan needs more attention to Mobility Alternative to help capture their potential.

T6. Mobility-Oriented Development

Text (Pg. 110):

"To reach GHG emissions reduction requirements, the State should place greater emphasis on programs and projects that that enable greater use of public transportation and other low-carbon mobility alternatives and investments that are informed by criteria that maximize sustainable land use/development patterns and climate outcomes."

Comment:

Consider rewording to read "***To reach GHG emissions reduction requirements, the State should prioritize programs and projects that create larger modal shifts away from automobile use by providing greater access to high quality public transportation and other low-carbon/energy efficient*** *mobility alternatives and investments that are informed by criteria that maximize sustainable land use/development patterns and climate outcomes.*"

Text (Pg. 111):

"While the State currently incorporates public transportation needs into efforts to attract and retain businesses, New York should implement incentives and policies for businesses and localities for development located adjacent to and integrated into public transportation services, including tax credits for businesses that accommodate non-vehicular commuting, such as Employee-Based Trip Reduction

programs; low-/no-cost transit passes for employees; micro-transit options for employees; ride-sharing programs; bike-sharing; and cycling accommodations."

Comment:

Full support for the strategies identified in this paragraph, which are key to impacting day-to-day mobility decisions by individuals:

T8. Expanding the Availability of Low-Carbon Transportation Alternatives

Overall Comments:

Analyze NYS regulatory requirement that create structural impediments to implementation of shared and low-carbon transportation alternatives, for instance:

- vehicle insurance does not accommodate needs of car sharing and creates an impediment to the expansion of car share services statewide. Ithaca Carshare may be contacted for more information on this issue (https://www.ithacacarshare.org/);
- insurance requirements also impact implementation of unconventional transportation projects, such as volunteer driver based program;
- lack of authority to reduce speed limits by municipalities;
- home-rule regulatory frameworks that favor for profit development schemes vs. MOD.

Bicycling has been the forgotten mode in the development of infrastructure across the state. Not having safe bicycle routes (specifically protected bike lanes and/or multiuse trails in urban areas) is repeatedly identified as the principal factor keeping people from cycling. Other factors are access to bicycles and weather/topography. Of these, the lack of safe networks of bicycle routes is the most critical and most difficult to address. The Scoping Plan should be more deliberate and specific in its support of expanding bicycling in NY state. The potential impact is immense and it works synergistically with all other transportation alternatives and transit in support of the plan goals.

Text (Pg. 113):

"As part of future investments, agencies and authorities should be required to prioritize low- and zero-emission transportation infrastructure in all activities, where feasible."

Comment:

Support this statement. Consider reiterating in other segments of this document. Consider removing the 'where feasible' phrase. This qualifier is not properly explained and is therefore subject to a high degree of interpretation.

T8. Components of the Strategy

Comment:

The '*low-emission streets and car-free streets'* component seems to encourage one-off improvements to individual streets or locations. This strategy will have limited impacts. It would be more effective to encourage systematic area-wide provision of safe bicycle and pedestrian facilities that would facilitate the use of these modes on a daily basis. In short, there is a need to encourage lifestyle changes where the transportation mode decision is as likely to be walking and bicycling as it is to use the car. This, of course, is most realistic in urban areas, where distance to destinations is likely to be less. But a transfer of even a small percentage of trips (5%-10%) in urban areas to transit and low-carbon transportation alternatives would be transformational.

The '*fund mobility options*' component is in-line with the previous comment. The main concern with this item is that it lacks determination. How do we move from '**should**' to '**must**' prioritize active, shared transportation and transit? We 'should' have been doing this for the last 40 years. Now we enter the time when we 'must' take action.

Overall, the plan must take a more forceful and directive approach with its many important strategic recommendations.

T9. New Technology Integration
Comment:
The focus should be on new technologies that support transit, active and shared transportation. Use of state resources for Automated Vehicles (AVs) should prioritize implementation of connected and automated transit, not private vehicles. There is a significant amount of research suggesting that AVs could lead to greater energy use, higher VMT and further sprawl development patterns.

Market Based Solutions and Financing
Comment:
The bulk of policies and strategies presented in the T10 and T11 are automobile based. A similar level of attention and thought should be given to providing financial incentives to reduce car dependency and enhance access and financing of alternative modes. Examples – tax incentives for car free commuting; tax incentive &/or subsidies that reduce the cost of bicycles to individuals; reduce the local funding share of transportation bike/ped/transit/shared transportation projects; reduce risks/liabilities of providing bike share, car share, etc.

T10. Transportation Sector Market-Based Policies
Components of the Strategy

- *Variable Pricing Parking Policies* –

Comment:
This component may not be as effective in smaller urban areas. Critical analysis is needed to determine how, and if, different approaches are needed depending on size of the urban area.

- *Mileage-Based User Fees: The State should enact legislation to establish a per mile fee system to fund investment in transportation infrastructure."*

Comment:
It is true that car use is relatively inelastic. However, one of the main goals of this plan should be to get people to drive less to reduce emissions, congestion and other costs of car dependency. A mileage-based user fee will be applicable to all cars, EVs included, and is also more closely aligned to VMT. It will be easier to communicate the message that the less you drive the less you pay. Hand-in-hand with driving less is the need to provide other transportation options through MOD, transit and active and shared transportation so people can fulfill their travel needs.