

MEMORANDUM Item 7

TO: Transportation Planning Board

FROM: Lyn Erickson, Plan Development and Coordination Program Director

SUBJECT: Summary of Comments Received and Proposed Responses on the 2016 Amendment to

the Financially Constrained Long-Range Transportation Plan (CLRP), the FY 2017-2022 Transportation Improvement Program (TIP), and the Air Quality Conformity Analysis

DATE: November 16, 2016

On October 13, 2016, the draft 2016 Amendment to the Financially Constrained Long-Range Transportation Plan (CLRP), the draft FY 2017-2022 Transportation Improvement Program (TIP), and the draft Air Quality Conformity Analysis were released for a 30-day public comment and inter-agency review period. The board was briefed on the 2016 CLRP Amendment, the FY 2017-2022 TIP, the Air Quality Conformity Analysis, and the CLRP Performance Analysis at its October 19, 2016 meeting. The comment period closed on November 12, 2016.

This memorandum provides a summary of the comments received and provides recommended responses for the board's consideration. For those comments received that referred to specific projects, TPB member agencies that are responsible for project implementation assisted in developing the responses. The project information included in this analysis reflects project details provided at the time the analysis began in March 2016. Many projects have advanced since that time and new information may be public, but is not part of the inputs to the 2016 CLRP Amendment, the FY 2017-2022 TIP, and the Air Quality Conformity Analysis.

Comments were received from more than 450 individuals, businesses, organizations, and governmental representatives. All comments received have been made available for review online at mwcog.org/TPBcomment. While this memo contains a summary of the comments, a separate compilation of every comment received has been made available to TPB members in both hardcopy and online formats. The TPB's Access for All Committee (AFA) also provided comments which are included and addressed in this memo.

The board will be briefed on the following comments received and recommended responses, and asked to accept the comments for inclusion in the documentation of the 2016 CLRP Amendment, the FY 2017-2022 TIP, and the Air Quality Conformity Analysis.

COMMENTS AND RESPONSES

Comments were received on the following projects and topics:

- A. DC Dedicated Bicycle Lane Network
- B. VRE Haymarket Extension
- C. I-395 Express Lanes
- D. I-66 Multimodal Improvements Inside the Capital Beltway

- E. I-66 Corridor Improvements Outside the Capital Beltway
- F. VA 28 Widening and HOV
- G. Dulles Airport Access Road Widening
- H. Pedestrian accommodations on Pohick Road widening
- I. Need for additional Potomac River crossings
- J. The CLRP is not sustainable and should be revisited
- K. Funding for bicycle and pedestrian improvements in the TIP

A. DC DEDICATED BICYCLE LANE NETWORK

161 Comments received from: 3 representatives from the United House of Prayer, 157 citizens, 1 non-profit or membership association.

- 1. **Comment:** One-hundred and sixty (160) comments were received objecting to the implementation of protected bike lanes on the 1200 block of 6th Street NW, as proposed in the Eastern Downtown Study segment. These comments included the following concerns and/or points:
 - Increased congestion and traffic delays on 6th Street NW and in the vicinity of the Verizon Center and Washington Convention Center
 - Removal of parking and convenient access to the United House of Prayer church and associated housing
 - Disproportionate impacts on low-income and/or minority communities
 - 9th Street NW would be a more suitable location

DDOT Response: DDOT is still studying and evaluating alternative design concepts for the Eastern Downtown Protected Bike Lane project and a final design alternative has not been selected. As the project development activities continue DDOT anticipates completing the planning study and selecting the preferred alternative later this year. In order to meet the TPB's schedule for including projects in its air quality emissions analysis DDOT advised TPB to use one of the four build alternatives with the maximum potential to change traffic conditions and thereby potential emission estimates in its analysis. Alternatives being studied by DDOT include protected bike lanes on 5th Street, 6th Street and 9th Street NW and the "no-build". Inclusion of the 6th Street alternative in the regional air quality emissions analysis at this time does not preclude DDOT from selecting one of the other study alternatives, including the "no-build" OR making other changes to this alternative as part of its efforts to evaluate alternative design concepts.

At the October 19 TPB meeting, Mr. Zimbabwe of DDOT stated that the agency is working with the impacted citizens and organizations through the project development process.

TPB Staff Response: TPB staff understands that the 6th Street alternative has been included for the purposes of analyzing the maximum air quality impacts on the project, and that DDOT will update the CLRP to reflect decisions that occur through the project development process at the appropriate time.

B. VRE HAYMARKET EXTENSION

14 Comments received from: 1 citizen, 13 non-profit or membership associations

1. **Comment:** The westward extension of VRE is important, but Gainesville is a more realistic and cost-effective terminus for the project. Right-of-way to Haymarket should be preserved for later expansion.

VRE Response: VRE is evaluating an extension to Haymarket as part of the Gainesville-Haymarket (GHX) study currently underway in order to understand the effects (e.g., ridership, environmental, cost) of a full extension. No decisions have been made to date on the scope of the extension such as station locations or a service plan and public comment is being sought regarding the extension. A decision on a locally-preferred alternative is anticipated in December 2016.

2. **Comment:** The project should be postponed in favor of the Long Bridge Improvement and after evaluations following the I-66 improvements.

VRE Response: GHX study is ongoing and extension is still under consideration by VRE. If the GHX project is adopted in the CLRP and subsequently it is decided not to advance the extension at a later day VRE will inform TPB and request it be removed from the CLRP.

While the GHX alternatives analysis results have shown the extension is not the most cost effective option when ridership and capital/operating cost are compared that measure is not the sole factor being considered in assessing the benefits or viability of the extension. While the travel forecasts have shown the I-66 express lanes/bus transit will also provide travel options in the I-66 corridor they have also shown a VRE GHX extension would carry approximately 3000-4000 persons in the peak hour or more than double the estimated persons carried by the proposed I-66 bus transit. The need for expansion of the Long Bridge does not eliminate the concurrent need for expansion of VRE Manassas Line service and capacity to continue to provide a high-capacity travel option in the I-66 corridor as an alternative transit mode. Federal funding for GHX is anticipated via the Federal Capital Investment Grant discretionary program; funding decisions are determined based on the merits of individual projects rather than on a comparative basis among other regional projects.

TPB Response: The project was approved for inclusion in the regional Air Quality Conformity Analysis by the TPB earlier this year as part of the ongoing federal study. As noted above by VRE the study is underway with a number of alternatives under consideration with a final decision anticipated in the next few months. The next update of the CLRP will reflect the final decision on the project.

C. I-395 EXPRESS LANES

301 Comments received from: 17 governmental representatives, 260 citizens, 20 non-profit or membership associations, 4 businesses

- 1. Comment: All comments received were in support of the project for a variety of reasons:
 - Improving mobility and travel time for all users

- Providing new options for single occupant drivers
- Improving access at the Eads Street Interchange
- Dedicating toll funding to transit improvements
- Using private rather than state and federal funding

TPB Staff Response: TPB staff have conveyed these comments to VDOT.

2. **Comment:** Toll pricing on the facility could become burdensome and should take into account socioeconomic factors to ensure vulnerable populations are not adversely impacted.

VDOT Response: While we understand the question centers on potential effects to low income drivers, the benefits of the Express lanes and the proposed additional capacity in the 66 and the 395 corridors have been demonstrated to apply to both the regular (free) lanes and the Express lanes, allowing these corridors to move more people and improving travel times on all lanes. There are choices, both tolled and free. Express lanes add new driving room for vehicles. In other words, drivers who choose to pay to drive in the tolled lanes reduce the number of vehicles wanting to travel in the free general purpose lanes. This means vehicles in both tolled and untolled lanes travel at better speeds.

- Express Lanes also provide room for bus transit, providing for reliable, quicker trips on transit. The Transportation Management Plan for the I-66 Corridor projects, which will be implemented during the construction phase, will provide 50% fare subsidies to encourage transit use and to mitigate additional costs of riding bus transit, and will waive the initial cost of transponders for qualifying low income commuters who wish to use the tolled lanes.
 There will also be additional incentives for vanpool formation travelling in the I-66 Corridor.
- Transit services that are being provided as part of the I-66 and I-395 projects will meet ADA
 accessibility requirements. Adding new transit services means new travel options for people
 with disabilities will be available.
- 3. **Comment:** Revenues generated from the toll facility should only be used for improvement and maintenance of that facility.

VDOT Response: The Virginia Code designates how toll revenues or concession payments from a project such as the Northern Extension of the I-395 Express Lanes can be used. Within these requirements, the Commonwealth Transportation Board (CTB) can use the revenues to pay for the costs of the project, including the costs of planning, operation, maintenance, and improvements incurred in connection with the project. They can also use the revenues to pay for programs and projects that are reasonably related to or benefit the users of the toll facility. Projects can include transit and multi-modal projects and services that improve travel in the project corridor. The priorities of metropolitan planning organizations, planning district commissions, local governments, and transportation corridors must be considered by the CTB in making project allocations from moneys in the Account.

For more information see Virginia Code Sections 33.2-309 and 33.2-1528.

D. I-66 MULTIMODAL IMPROVEMENTS INSIDE THE CAPITAL BELTWAY

14 Comments received from: 1 citizen, 13 non-profit or membership associations

1. **Comment:** The widening of I-66 Inside the Beltway westbound should be done at the same time as the eastbound widening.

VDOT Response: The project includes the widening of I-66 in the eastbound direction from the Dulles Toll Road (DTR) to Fairfax Drive near Ballston by 2020. It also includes the westbound widening between the Sycamore Street off-ramp to the Washington Blvd. on-ramp by 2040. The eastbound widening will address a key bottleneck inside the beltway and will add needed capacity as quickly as possible.

TPB Staff Response: Changing the completion date of projects now would require that the months-long Air Quality Conformity Analysis be repeated prior to approval. VDOT has the option of making alterations to completion dates in the next update to the CLRP.

E. I-66 CORRIDOR IMPROVEMENTS OUTSIDE THE CAPITAL BELTWAY

31 Comments received from: 15 citizens, 16 non-profit or membership associations

1. **Comment:** 31 comments were received in support of the project for providing additional highway and transit capacity on the facility.

TPB Staff Response: TPB staff have conveyed these comments to VDOT.

2. **Comment:** Large vehicles should not be allowed to use the Express Lanes outside the Capital Beltway due to noise concerns.

VDOT Response: The Commonwealth has specified in its proposed contract with a private-sector partner that multi-axle vehicles will be permitted to use the express lanes, as this provision will help provide value to the overall project cost through increased revenues from trucks. Increased revenues from trucks can help reduce the public contribution for the project and ensure that future annual payments for transit improvements in the corridor will be available. Allowing trucks to use the Express lanes provides other benefits such as improving travel in the general purpose lanes, improving the movement of goods and services, supporting local business enterprises in the corridor, and in many areas of the corridor, allows trucks to travel in lanes that are further removed from adjacent communities.

VDOT has evaluated the existing traffic model to understand how travel along the corridor could change as a result of multi-axle vehicles on the express lanes. The resulting traffic model outputs confirmed that allowing trucks on the Express Lanes are within the range of our earlier findings. VDOT will formally re-evaluate the project's Environmental Assessment to account for alternative technical solutions that are being considered, including updated traffic, air and noise analyses to account for the addition of multi-axle vehicles in the express lanes as proposed by VDOT's private-sector partner, who will design, build, finance, operate and maintain the express lanes. The revised findings will be coordinated with the Federal Highway Administration.

The public and key stakeholders will have opportunities to learn about and provide input on the additional analysis that is completed, as well as final design concepts, through public information meetings, and design public hearings which will include a reevaluation of the environmental analysis including the impacts of the addition of trucks to the facility. The hearing will be held in 2017, prior to construction.

3. **Comment:** Despite new and expanded transit service and the incentive for high-occupancy vehicle trips, the HOT lanes could facilitate the spread of sprawling development.

TPB Staff Response: We understand that VDOT has initiative this project based on a purpose and need study it had previously conducted and its analysis is based the land use plans adopted by the localities in the region. The TPB's CLRP does not develop or approve land use for the region instead it accepts the land use plans as developed and officially adopted by the local jurisdictions of this region. The land use assumptions included in the 2016 CLRP calls for 75 percent of the new jobs and 60 percent of new population between 2016 and 2040 to be located within Regional Activity Centers consistent with TPB's goal of coordinated transportation and land use planning.

F. VA ROUTE 28 WIDENING AND HOV

15 Comments received from: 1 citizen, 14 non-profit or membership associations

1. **Comment:** All comments supported the inclusion of the project in the CLRP. One comment suggested advancing the completion date of the widening of Route 28 between the Prince William County Line and US 29 in Fairfax County from 2025 to 2019, to match the completion of the I-66/Route 28 interchange.

VDOT Response: This project has received FY2015-16 funding from the NVTA to begin preliminary engineering and environmental work. It currently is not funded for construction. If funding becomes available, the project may be completed before 2025.

TPB Staff Response: Changing the completion date of this project now would require that the Air Quality Conformity Analysis, which takes months to complete, be repeated prior to approval. VDOT has the option of advancing the completion date in the next update to the CLRP.

G. DULLES AIRPORT ACCESS ROAD WIDENING

Comments received from: 1 citizen

1. **Comment:** This project should be removed. Study converting the Dulles Airport Access Road into HOT lanes.

TPB Staff Response: This comment has been conveyed to VDOT. This project was approved for inclusion in the regional air quality conformity analysis by the TPB earlier this year based on

VDOT's currently approved project and programming plans. Should the plans for the project change the changes will be reflected during the next update of the CLRP.

H. PEDESTRIAN ACCOMMODATIONS ON POHICK ROAD WIDENING

Comments received from: 1 citizen

1. Comment: The widening of Pohick Road must include pedestrian facilities.

TPB Staff Response: Fairfax County's 6-year Transportation Priorities Plan (TPP) includes full funding to eliminate the bottleneck, widen and install a sidewalk/trail on Pohick Road from I-95 to Route 1. The project is not scheduled for construction until 2022 or later.

I. NEED FOR ADDITIONAL POTOMAC RIVER CROSSINGS

Comments received from: 1 citizen

1. Comment: The CLRP should include a second Potomac River crossing.

TPB Staff Response: As of today no agency has concluded the planning studies and identified funding for a project to address the congestion and mobility needs across the Potomac River.

MDOT Response: The idea of a Potomac River Crossing has been examined on and off many years ago. The original idea of connecting I-370 in Maryland to VA 28 has seen enormous changes in land use since the 1960s to 1980s when that alignment was discussed. It would currently be very difficult to locate a new crossing through this populated area. By the time you move further north to a location that could accommodate a crossing, you are too far away from the American Legion Bridge to see any significant diversion.

MDOT, in coordination with VDOT, is moving forward with a strategic plan for the west side of I-495. Maryland added \$6 million in 2015 for the congestion relief study. Over the past years, Maryland has completed the Inter County Connector and is making Innovative Congestion Management improvements to the I-270 corridor. The Capital Beltway from the I-270 West Spur to the I-495 Express Lanes is a top congested location. The I-495 West/American Legion Bridge Strategic Plan is part of MDOT's overall efforts to understand statewide transportation needs and will be used in long-term planning of major investments.

J. THE CLRP IS NOT SUSTAINABLE AND SHOULD BE REVISITED

Comments received from: 1 citizen

1. **Comment:** The CLRP will not achieve climate goals, does not enable sustainability, and encourages sprawl. The CLRP should be replaced with a new plan that moves in a sustainable direction.

TPB Staff Response: The regional air quality conformity analysis of the CLRP indicates not only emissions of EPA's criteria pollutant from on-road vehicles below federally approved emissions

levels for this region but also a continually decreasing trend of these emissions. Beyond this federally mandated air quality test the TPB has voluntarily assessing the reduction in greenhouse gases from the highway and transit projects in its long range transportation plan. This analysis indicates a continuing reduction in the emissions of greenhouse gases. The TPB continues to be engaged in promoting projects that would reduce emissions of pollutants through its own Commuter Connections program and its emphasis on transportation emissions reduction measures to be adopted by its member jurisdictions. The TPB members are also engaged in this effort in their participation in COG's Climate, Energy, Environmental Policy Committee Action plan work activity. The TPB also continues to emphasize sustainable land use and transportation practices via its policy documents such as the Vision document and Green Streets policy. While there has been progress in this area more works needs to be done and the TPB remains committed to supporting efforts in this regard.

K. FUNDING FOR BICYCLE AND PEDESTRIAN IMPROVEMENTS IN THE TIP

Comments received from: 1 non-profit organization

1. **Comment:** Given the projections of increased trips by walking and bicycling in the CLRP Performance Analysis, funding for bicycle and pedestrian projects makes up less than 3% of the TIP.

TPB Staff Response: The TIP is required to include all regionally significant transportation projects and all projects receiving funds from the Federal Highway Administration or Federal Transit Administration. To that end, the TIP does not provide a comprehensive view of all funding spent in the region on transportation. There are many bicycle and pedestrian projects that are not regionally significant and that are funded by state or local governments which are not always included in the TIP. Additionally, there are many roadway and transit projects in the CLRP that do include bicycle and/or pedestrian accommodations that are not accounted for in this 3%. The portion of the cost that is spent towards those accommodations can be difficult to break out from the project total. While the amount presented is an underrepresentation of actual funding, it's what can be shown given the data available.

COMMENTS FROM THE ACCESS FOR ALL (AFA) ADVISORY COMMITTEE

Each year the TPB's Access for All Advisory Committee comments on the draft CLRP. At the October 27, 2016 AFA meeting, TPB Vice Chairman Charles Allen facilitated a discussion about concerns the committee wanted to bring to the TPB's attention after receiving presentations on the proposed changes for the 2016 CLRP Amendment and the expected performance of the plan. The AFA was recently restructured to include not only community leaders representing low-income communities, minority communities and people with disabilities, but also individuals with limited-English skills and older adults. The enhanced AFA committee has met three times since June 2016.

The AFA discussions resulted in two categories of comments: those specific to the CLRP amendment and other general transportation concerns. All the AFA comments are attached in a memorandum from Charles Allen. The four comments related to the CLRP projects are provided below, with recommended responses.



Overall, the AFA stressed the importance of affordable, reliable and accessible rail, bus and paratransit for people with disabilities, those with limited incomes, minority communities, people with limited English skills, and older adults. The comments on transportation issues not directly related to a CLRP project are being provided to the board to raise awareness about the needs of transportation-disadvantaged populations for consideration as decision-makers study, plan and implement transportation improvements.

- 1. AFA Comment: The AFA expressed concern about the additional burdens that high-occupancy toll (HOT) lanes may place on low-income populations and questioned if low-income populations can fully participate in the benefits of these new facilities, including purchasing a transponder and pre-paying tolls with a credit card. The AFA applauds the plans to include significant additional bus service in these corridors, but recommends that the transit service be fully implemented and improved as necessary.
 - **VDOT Response:** While VDOT understand the questions center on potential effects to low income drivers, the benefits of the Express lanes and the proposed additional capacity in the 66 and the 395 corridors have been demonstrated to apply to both the regular (free) lanes and the Express lanes, allowing these corridors to move more people and improving travel times on all lanes. There are choices, both tolled and free. Express lanes add new driving room for vehicles in. In other words, drivers who choose to pay to drive in the tolled lanes reduce the number of vehicles wanting to travel in the free general purpose lanes. This means vehicles in both tolled and untolled lanes travel at better speeds.
 - Express Lanes also provide room for bus transit, providing for reliable, quicker trips on transit. The Transportation Management Plan for the I-66 Corridor projects, which will be implemented during the construction phase, provides 50% fare subsidies to encourage transit use and to mitigate additional costs of riding bus transit, and waiving the initial cost of transponders for qualifying low income commuters who wish to use the tolled lanes. There will also be additional incentives for vanpool formation travelling in the I-66 Corridor.
 - Transit services that are being provided as part of the I-66 and I-395 projects will meet ADA
 accessibility requirements. Adding new transit services means new travel options for people
 with disabilities will be available.
- 2. AFA Comment: The AFA recommends that the CLRP include full funding for Metro's core capacity needs, including 8-car trains and supports a sustainable funding source for Metro. The AFA is concerned about Metrorail remaining both affordable and available to residents and low-income workers, and specifically expressed concerns about proposals for reducing Metro service and impact on those who are transit-dependent. The AFA supports the development of a multi-state agreement for a stable source of funding for Metrorail, Metrobus and MetroAccess.

TPB Staff Response: The COG Board of Directors created a Technical Panel charged with analyzing operating and capital funding needs and assessing revenue options to meet these needs, among other things. The interim report from the Technical Panel will be shared with the AFA committee as well as the final report expected in Spring 2017. At the December 15 AFA meeting, Metro staff will be asked to present the proposals for Metrorail service changes related to maintenance needs, and service and fare changes proposed for the FY2018 Metro budget. This will give the AFA committee a chance to ask questions about the proposals and learn about the public comment process that Metro has in place.

3. **AFA Comment:** The AFA expressed concern that the region is not only divided by race and income, but also by access to jobs, as shown in the "access to jobs by auto" measure in the performance analysis of the CLRP. The AFA supports actions to address the East-West divide, such as an increase in all modes of transportation to connect the eastern part of the region to the job-rich eastern portion.

TPB Staff Response: Both future transportation and land use patterns contribute to the changes in "access to jobs" forecast for 2040. The transportation impacts of an East-West divide will be considered by the TPB's Long-Range Task Force, as will the Environmental Justice analysis. The Phase 1 Report from the Long-Range Task Force summarizes the results from an "All-Build" and "No-Build" scenario. The scenario analysis found that "access to jobs by auto" would be much worse in 2040 without the CLRP, and that under the "All-Build" scenario, "access to jobs by auto" would include significant gains in job accessibility for both the eastern and westerns portions of the region due to significant increases in roadway capacity. The "All-Build" scenario is financially beyond reach, so the next phase of the Long-Range Plan Task Force's work is to focus on the development of a smaller set of unfunded projects with the greatest potential to improve mobility, accessibility and equity. The AFA will be briefed on the work of the Long-Range Plan Task Force at key stages in the process.

4. **AFA Comment:** The AFA discussed the Crystal City Transitway project and was concerned that funding for BRT is being prioritized over pedestrian infrastructure investments in an area already well-served by transit.

Arlington County Response: Arlington's FY 2017-2026 Capital Improvement Plan contains \$87 million in funding for a program of Crystal City, Pentagon City, and Potomac Yard street projects. This program will transform streets from auto-centric to multimodal complete streets with improved pedestrian facilities, bicycle lanes, on-street parking, improved street lights, traffic signals, the transitway, and Americans with Disabilities Act-compliant facilities. Additionally, the primary purpose of the transitway is to provide a quick and reliable surface transit option that brings more of Crystal City and Potomac Yard within walking distance of high-quality transit service. The transitway is a key component in Arlington County's adopted land and transportation plans for the Crystal City and Potomac Yard area.

5. **AFA Comment:** The AFA noted that people who have hearing, visual and mobility limitations are concerned about their safety when crossing a street with a bike lane that is part of the DC Dedicated Bicycle Network; people with sensory or physical impairments may not be able to see or hear the bikes, or move quickly enough to get out of the way of a bike.

DDOT Response: Minimizing the risk to pedestrians, especially pedestrians with mobility or sensory disabilities, is an important part of DDOT design work for all types of travel facilities, including bike lanes. For protected bike lanes of the kind being considered under the Eastern Downtown Protected Bike Lanes study, designers will be considering and including elements to make crossings safer and more predictable. Protected bike lane design is a new and evolving field, and lessons-learned from prior projects help to ensure that facilities are continually improving. DDOT also has and will continue to fund a variety of safe-riding education and promotion programs to encourage safe riding behaviors, particularly around pedestrians.



MEMORANDUM

TO: Transportation Planning Board

FROM: Charles Allen, Chair, Access for All Advisory Committee

TPB Second Vice Chair

SUBJECT: AFA Comments on the Draft 2016 Financially Constrained Long-Range

Transportation Plan (CLRP) Amendment

DATE: November 16, 2016

At the October 27, 2016 Access for All Advisory (AFA) Committee meeting, the committee discussed the proposed changes for the 2016 Financially Constrained Long-Range Transportation Plan (CLRP) amendment and provided general feedback on transportation-related concerns. These discussions resulted in comments in two categories: comments specific to the draft 2016 CLRP amendment and other general transportation concerns.

Overall, the AFA stressed the importance of affordable, reliable and accessible rail, bus and paratransit for people with disabilities, those with limited incomes, minority communities, people with limited English skills, and older adults. The AFA had eight summary comments, listed below, with additional detail under each comment provided in the following pages.

- The AFA expressed concern about the additional burdens that high-occupancy toll (HOT) lanes may place on low-income populations.
- The AFA recommends that the CLRP include full funding for Metro's core capacity needs including 8-car trains and supports a sustainable funding source for Metro.
- The AFA expressed concern that the "Access to Jobs" measure shows an East-West divide, and that the region is not only divided by race and income, but also by access to jobs.
- The AFA recommends prioritizing transportation funding for pedestrian infrastructure in the CLRP which is critical for people with disabilities' and older adults' safety, access and mobility. The AFA also noted that people with disabilities have safety concerns when using crosswalks near the DC Dedicated Bicycle Lane Network.
- The AFA emphasized that accessibility for people with disabilities should be considered throughout the planning, design, construction and implementation stages of transportation projects or services.

- The AFA would like to see additional and more affordable public transportation options throughout all parts of the region
- The AFA stresses the importance of diversity and sensitivity training for front-line transit employees and transportation network company drivers, such as Uber and Lyft drivers.
- The region should support increasing resources for MetroAccess to serve additional demand and maintain service quality, and facilitate the provision of alternative options.

COMMENTS SPECIFIC TO THE DRAFT 2016 CLRP AMENDMENT

The AFA expressed concern about the additional burdens that high-occupancy toll (HOT) lanes may place on low-income populations.

- The draft 2016 CLRP amendment includes high-occupancy toll (HOT) lanes on I-395 and I-66 in Virginia which would require users to pay fees for use of the facilities when driving alone. The AFA commented that tolled facilities tend to place additional burdens on low income workers, people with disabilities and those with limited English skills, and asked if the project would have affordability and accessibility provisions.
- The AFA committee questioned if low-income populations can fully participate in the benefits of these new facilities and from the benefits of purchasing a transponder as well as pre-paying tolls with a credit card.
- The AFA applauds the plans to include significant additional bus service in these corridors, but recommends that the transit service be fully implemented and improved as necessary.

The AFA recommends that the CLRP include full funding for Metro's core capacity needs including 8-car trains and supports a sustainable funding source for Metro.

- The committee noted that full funding for Metro 2025 projects, capital initiatives to expand the core and system capacity, is not included in the draft 2016 CLRP, especially 8-car trains during rush hour.
- The AFA is concerned about Metrorail remaining both affordable and available to residents and low-income workers, and specifically expressed concerns about

- proposals for reducing late-night Metrorail service hours, station closures and eliminating bus service and the impact on those who are transit-dependent.
- The AFA also recognizes Metro's current maintenance and revenue challenges and expressed strong support for Metro's efforts to improve safety, maintenance and service quality, and expressed support for the development of a multi-state agreement for a stable source of funding for Metrorail, Metrobus and MetroAccess.

The AFA expressed concern that the "Access to Jobs" measure shows an East-West divide, and that the region is not only divided by race and income, but also by "access to jobs".

- The AFA received a presentation on the performance analysis of the draft 2016 CLRP amendment, including Figure 1 showing changes in "access to jobs by auto" with the greatest losses on the eastern side of the region and that the greatest gains are on the western side of the region.
- The AFA supports actions to address the East-West divide, such as an increase in all modes of transportation to connect the eastern part of the region to the job-rich western portion.

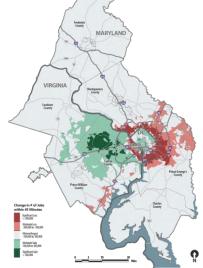


Figure 1: Changes to Access to Jobs by Auto in 45 Minutes, 2016 to 2040

The AFA recommends prioritizing transportation funding for pedestrian infrastructure in the CLRP which is critical for people with disabilities' and older adults' safety, access and mobility. The AFA also noted that people with disabilities have safety concerns when using crosswalks near bike lanes.

- The AFA commented on the Crystal City Transitway project and was concerned that funding for BRT is being prioritized over pedestrian infrastructure investments in an area already well-served by transit.
- All pedestrians must be cognizant of bicycles in the bike lanes that are part of the DC Dedicated Bicycle Lane Network, but people who have hearing, visual and mobility limitations are especially concerned about their safety. People with sensory

or physical impairments may not be able to see or hear the bikes, or move quickly enough to get out of the way of a bicyclist when crossing a street with a bike lane, or when exiting a vehicle that is parked near a bike lane.

The District Department of Transportation (DDOT) and other implementation
agencies should consider the safety concerns of people with disabilities and the
need for education and awareness of pedestrians, bicyclists and drivers as these
agencies maintain, build and propose bike lanes.

COMMENTS ON OTHER TRANSPORTATION CONCERNS

The AFA emphasized that accessibility should be considered throughout the planning, design, construction and implementation stages of all transportation projects or services.

- When implementing agencies consider the needs of people with disabilities early on, as well as throughout the planning stages of a project, the accessibility and usability of the transportation improvement can be greatly improved for everyone.
- The AFA noted that people using mobility devices have difficulty in finding accessible parking options in D.C. as well as the need for more accessible transportation options in general.
- The AFA recommended that WMATA expedite efforts to close the gap between the new
 rail cars and the station platforms on Metrorail because of the number of people using
 mobility devices being caught in the gap, either causing injuries to the riders or damages
 to the mobility devices.
- With regards to language access, the AFA recommends that WMATA as well as the
 District Department of Transportation (DDOT), the Maryland Department of
 Transportation (MDOT) and the Virginia Department of Transportation (VDOT) provide
 greater language access to limited English speakers to ensure that they can comment on
 proposed service changes and/or transportation projects. WMATA's efforts to build
 partnerships with language access advocacy organizations should continue; there was a
 concern that this effort has not been sustained.

The AFA would like to see additional and more affordable public transportation options throughout all parts of the region.

- The AFA commented that there is a need for more public transit in the region, and while the CLRP includes \$145 billion for transit and \$99 billion for highways, the committee is concerned that this funding level is not adequate to support increased service connecting jurisdictions in MD, VA and DC and the outer suburban areas.
- The AFA supports making all public transportation options affordable to population groups with limited incomes who rely on them. In the face of rising transit fares, the committee supports incentives for people with limited incomes; incentives could include user-side subsides or reduced fare programs.
- While the committee commended the region's commitment to investing in transit in the CLRP, the AFA is concerned about transit-dependent populations being priced out of high-density areas, such as activity centers and near Metrorail stations. Some people are unable to live in these areas well served by transit and other public services because the housing costs are out of reach, so they are forced to find housing that is farther away from these critical services.

The AFA stresses the importance of diversity and sensitivity training for frontline transit employees and ride-sharing company drivers.

• The committee recommends that transportation providers augment sensitivity training of front-line employees and transportation network company drivers so that they know how to appropriately communicate and assist all customers; such training should include awareness of and sensitivity to the lesbian, gay, bisexual, transgender (LGBT) community, different types of disabilities, and different cultural and ethnic backgrounds.

The region should support increasing resources for MetroAccess to serve additional demand and maintain service quality, and facilitate the provision of alternative options.

Demand for ADA paratransit will increase due to requirements to transition people with intellectual and developmental disabilities to community-based independent living and the aging population. AFA members expressed concerns that MetroAccess may not have the resources to serve this additional demand and maintain service quality at the same time; not all human service agencies can afford to provide the transportation themselves, as they have done in the past.



- The AFA noted that some people with severe disabilities need a greater level of service than what ADA paratransit can provide; but pilot programs that directly funding human service agencies to provide transportation to their clients rather than using MetroAccess have shown good results and resulted in savings for jurisdictions. The region must look at a variety of options, including Medicaid transportation and enhanced mobility grant funding, to ensure the ongoing availability of specialized transportation services needed by customers with intellectual disabilities.
- The AFA recommends that the region continue to support alternatives to
 MetroAccess, such as taxi pilots, and the use of transportation network companies or
 other providers in the Abilities-Ride proposal, to the extent that these options can
 provide fully accessible service for people with a wide range of disabilities and are
 less expensive to the jurisdictions than MetroAccess.