

National Capital Region Transportation Planning Board

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Item 8

M E M O R A N D U M

November 17, 2010

TO: Transportation Planning Board

FROM: Ronald F. Kirby
Director of Transportation Planning

SUBJECT: Review of Comments Received and Recommended Responses for Inclusion in the Air Quality Conformity Assessment, the 2010 Financially Constrained Long Range Transportation Plan (CLRP), and the FY 2011-2016 Transportation Improvement Program (TIP)

Background

At the October 20, 2010 meeting, the Board was briefed on the air quality conformity analysis for the 2010 CLRP and the FY 2011-2016 TIP. These documents were released for public comment and agency review at the TPB Citizens Advisory Committee (CAC) meeting on October 14, 2010. Announcements of the public comment period were published in the *Washington Post* (attached), the *AFRO American Newspaper*, and the *EL PREGONERO* newspaper. The public comment period closed on November 13.

Public comments submitted by individuals, organizations, and businesses were posted as they were received on the TPB web site at

<http://www.mwcog.org/transportation/public/comments.asp>.

This memorandum provides recommended responses to comments received.

The Board will be briefed on the comments received and asked to accept the recommended responses for inclusion in the air quality conformity assessment, the 2010 CLRP, and the FY 2011-2016 TIP. The final version of the comments and responses memorandum will be incorporated into the documents scheduled for consideration under agenda items 9, 10 and 11.

Comments and Responses

The comments received and recommended responses are summarized below:

Access for All (AFA) Advisory Committee Comments Presented at the October 20 TPB Meeting

1. **Comment:** The AFA recommends that the District, Maryland and Virginia Departments of Transportation be more cognizant of how construction projects can block pedestrian access for persons with disabilities. AFA members stated that people with disabilities are having difficulty navigating 14th Street NW due to construction in the Columbia Heights neighborhood of Washington, DC.

Response: The District of Columbia Department of Transportation (DDOT), the Maryland State Highway Administration, and the Virginia Department of Transportation are aware and sensitive to safe and efficient bicycle and pedestrian access around construction zones. All three agencies have policies in place requiring safe access around construction projects. Project managers must consider accommodations for pedestrians with disabilities during preliminary engineering stages. Individuals can report problems with pedestrian access around specific construction sites to the respective agency:

In Virginia: www.virginiadot.org/info/feedbackform.asp

In Maryland: http://marylandsha.force.com/customercare/request_for_service

In the District of Columbia: <http://311.dc.gov/cwi/citizenweb/ui/citizenwebintake.aspx>

DDOT requires that pedestrian access be maintained at all times during construction. Because construction sites are very fluid, with conditions constantly changing, there were times during the construction in Columbia Heights that one side of the crosswalk or sidewalk was closed with proper signs directing pedestrian movements. If pedestrians observe an unsafe condition or obstructed access, they should immediately call the Customer Service Center at 311 or call DDOT directly at 202-673-6795. If it is a persistent problem they can contact Brett Rouillier, in the Civil Rights Office at 202-671-0533.

2. **Comment:** The AFA would like to see more pedestrian, bicycle and transit improvements in the CLRP, and urges local jurisdictions to make use of the Regional Bus Stop Inventory to improve bus stops for people with disabilities.

Response: Despite current challenging budget constraints, the District of Columbia, Maryland and Virginia, Departments of Transportation (DOTs) and local jurisdictions have ongoing pedestrian and bicycle improvement programs which are making strides to enhance pedestrian and bicycle infrastructure. In addition, many of the highway projects in the CLRP include pedestrian and bicycle improvements. In October 2010, the TPB approved the 2010 Update of Bicycle and Pedestrian Plan that identifies major bicycle and pedestrian projects and studies for the region over the next 30 years, including both funded and unfunded projects. Each year, the Bicycle and Pedestrian Subcommittee presents a

priority list of bike and pedestrian projects to the TPB recommending that the projects be funded by transportation implementing agencies in the next Transportation Improvement Program (TIP).

There are numerous transit expansion projects in the CLRP, including new bus rapid transit services funded under the TIGER grant, new segments of a streetcar network in the District of Columbia, the Purple Line light rail service in Maryland, and streetcar services in Virginia. The financial analysis for the 2010 CLRP shows that 64 percent of the “reasonably expected to be available” total revenues for transportation through 2040 are committed to local and regional transit. However, the analysis also showed that not all of WMATA’s requests for capital and operating support could be funded, with the result that transit ridership beyond 2020 had to be constrained in the travel demand forecast.

Recognizing the importance of bus stop improvements for transportation-disadvantaged populations, in February 2010 the TPB partnered with WMATA and local jurisdictions to apply for a \$16.6 million grant from the Federal Transit Administration (FTA) that would have improved the safety and accessibility of approximately 2,500 bus stops throughout the region. The Regional Bus Stop Inventory was used to identify needed bus stop improvements. While FTA did not award funding to the region for this program, WMATA and the TPB will continue to advocate for funding needed to enhance bus stops.

3. **Comment:** The AFA wanted to know how with tight transportation funding implementing agencies take into consideration the cost and benefits of investing in construction projects with ongoing maintenance costs (e.g., the D.C. Streetcars and the I-270 extension) versus investing in facility enhancements.

Response: DDOT considers the financial considerations for maintenance costs during the planning for new projects, as well as in evaluations of existing projects. It considers for both WMATA and District transit services the maintenance costs necessary to sustain services for both the short term and long term. When looking at the transportation needs for the District, DDOT considers investments and enhancements to existing facilities, as well as new services that can support the transportation network, expand opportunities to accommodate growth in the city, and improve connectivity for the city neighborhoods. Specifically for the DC Streetcar Project, DDOT considered the cost of vehicle operators, vehicle maintenance staff and administrative support. When DDOT selects a preferred alternative in the Streetcar planning study, further analysis will be conducted to ensure that funding considerations are addressed for operational and maintenance costs for the entire Streetcar network.

MDOT’s first priority is to maintain the existing infrastructure as opposed to investing in facility enhancements. As described in response 5 below, a number of transit and highway improvements have been analyzed in the I-270/US15 multi-modal study over many years. This study has considered a wide range of benefits and costs and environmental impacts. The preferred alternative has yet to be selected.

4. **Comment:** The AFA expressed concern that Maryland is proposing to extend highway improvements as part of a \$3.4 billion project on I-270/US 15, and recommended that transportation demand management (TDM) strategies be considered before expensive expansions are proposed.

Response: The Maryland Department of Transportation has been studying multi-modal transportation options for the I-270/US 15 Corridor since 1994. A Travel Demand Management (TDM) alternative and transit-only alternatives were considered in the study. The study results have shown that no single transportation strategy alone will meet the projected travel demand in the corridor. It is a federal requirement under the National Environmental Policy Act (NEPA) that major capital projects be included in the region's CLRP before completing the NEPA process. For the CLRP a project placeholder for an I-270 improvement has been specified with an assumed completion date of 2030.

Other Comments

5. **Comment:** The Action Committee for Transit objects to the proposed allocation of \$3.4 billion to widen I-270 and US 15 north of Shady Grove Metro Station, and asserts that the decision is being made with an utter lack of transparency.

Response: The I-270/US15 HOV/Widening from Shady Grove to I-70 (approximately 24 miles) has been included in the CLRP since 2003. The project is included in the 2010 listing of "significant changes" because its limits are being extended 7 miles along US 15 from I-70 to Biggs Ford Road. Since 2003, the project has been in the planning phase, and the proposed configuration of HOV lanes and lane widening has changed slightly over the years within those limits. The project cost estimates have also increased over the years, and the completion date has moved from 2020 to 2030. Every year since 2003, there have been opportunities for public comment on this project and its modifications. The inclusion of this project in the CLRP is as a place holder that will eventually be revised to match the specific Preferred Alternative identified by the on-going National Environmental Policy Act (NEPA) process.

6. **Comment:** The Action Committee for Transit asserts that widening I-270 is a waste of money and that all transit alternatives should be analyzed.

Response: This project has been jointly managed by the Maryland State Highway Administration and Maryland Transit Administration since 1994. The project team used a focus group approach and expert land use panel to develop the goals of the project and initial alternatives to be considered. The Action Committee for Transit (ACT) was an active participant of the focus group. The initial alternatives considered and studied included TSM/TDM options, highway alternatives, and transit alternatives.

The transit only alternatives considered during this stage of the study included heavy rail north of Shady Grove, as well as light rail and bus rapid transit options. Based on the study results, an assessment was made that no single transportation strategy alone would meet the projected travel demand in the corridor. The project team then developed several "combination alternatives" that included transit investment (the Corridor Cities Transitway

as either light rail or bus rapid transit) and highway investment (general purpose, HOV, or a combination of these on I-270 and US 15). In December 2009, the TPB was briefed on the I-270/US 15 Corridor Study, which included the Corridor Cities Transitway. The briefing covered the study background, its purpose and need, measures of effectiveness, an overview of the alternatives studied, a summary of public and agency comments received to date, and next steps.

A more detailed corridor implementation plan for the multitude of transportation solutions developed for the corridor appears in the Draft Environmental Impact Statement (DEIS) on Page II-3 (<http://www.i270multimodalstudy.com/environmental-studies/deis>). It is important to note that the inclusion of the roadway and transit improvements associated with the Multi-Modal Corridor Study in the CLRP does not dictate a Preferred Alternative. To date, a Preferred Alternative has not been selected.

7. **Comment:** Why are there not any entries for MARC service expansion in the CLRP, even though the MTA has published a 30-year plan for improving MARC service? Is this not the kind of item that would be listed under "transit" in the CLRP?

Response: MDOT has included \$679 million in the 2010 CLRP for MARC projects from the MARC Growth and Investment Plan and has entered them into the TPB database. However, projects included in the CLRP project lists are new facilities or new services, not improvements to existing service. Improvements to MARC service as well as improvements to Metro and other commuter rail services are accounted for in the financial analysis for the CLRP, and in the travel demand modeling process that the TPB uses to make its air quality conformity determination, but are not included in the CLRP major improvements maps nor listings.

The Washington Post

CLASSIFIED

THURSDAY, OCTOBER 14, 2010

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**PUBLIC COMMENT PERIOD
FOR THE WASHINGTON REGION'S
PROPOSED 2010 UPDATE TO THE
CONSTRAINED LONG-RANGE PLAN
(CLRP), FY 2011-2016 TRANSPORTATION
IMPROVEMENT PROGRAM (TIP), AND
AIR QUALITY CONFORMITY ANALYSIS**

The National Capital Region Transportation Planning Board (TPB) will initiate a 30-day public comment period for the proposed 2010 update to the Constrained Long-Range Plan (CLRP) and amendments to the FY2011-2016 Transportation Improvement Program (TIP), including an air quality conformity analysis, on October 14, 2010 at the TPB Citizen Advisory Committee (CAC) meeting. The CAC meets from 6 pm to 8 pm in the Metropolitan Washington Council of Governments (COG) first floor conference center, 777 N. Capitol St. NE, Washington, DC 20002. These documents are scheduled to be approved at the November 17, 2010 TPB meeting. This public comment period will extend through 6 pm Saturday November 13, 2010. Members of the public are invited to review these draft documents on the COG website, www.mwco.org/transportation/. These materials may also be reviewed at COG.

The CLRP shows the road, bridge, high-occupancy vehicle (HOV), transit, bicycle and pedestrian projects funded through the year 2040. The six-year TIP includes all projects, programs, and strategies that state and local transportation agencies plan to implement between 2011 and 2016. The TIP comment process is being used to obtain comments on the region's program of projects that are funded by the Federal Transit Administration (including projects funded by the Urbanized Area Formula Program) and the Federal Highway Administration. The air quality conformity analysis assesses the plan amendments and program with respect to the air quality requirements under the 1990 Clean Air Act Amendments.

Members of the public are invited to submit comments on the draft documents on-line at www.mwco.org/topubliccomment/. Written comments can also be mailed to TPB Chairman David Snyder, Metropolitan Washington Council of Governments (COG), 777 N. Capitol St. NE, Suite 300, Washington, DC 20002.

For additional information or for special assistance, please call (202) 962-3311 or (202) 962-3213 (TDD).