



MEMORANDUM

TO: Transportation Planning Board
FROM: Kanti Srikanth, TPB Staff Director
SUBJECT: Steering Committee Actions and Report of the Director
DATE: September 15, 2016

The attached materials include:

- Steering Committee Actions
- Letters Sent/Received
- Announcements and Updates



MEMORANDUM

TO: Transportation Planning Board
FROM: Kanti Srikanth, TPB Staff Director
SUBJECT: Steering Committee Actions
DATE: September 15, 2016

At its meeting on September 9, the TPB Steering Committee approved the following resolutions to amend the FY 2015-2020 Transportation Improvement Program (TIP) that are exempt from the air quality conformity requirement:

- SR7-2017: To include \$6.7 million in federal and state funding for the widening of East Spring Street between Herndon Parkway and Fairfax County Parkway in Fairfax County; and to include \$14 million in federal and state funding for the widening of VA Route 28 between the Prince William County Line and VA Route 29 in Fairfax County, as requested by the Virginia Department of Transportation (VDOT)
- SR8-2017: To include \$5.9 million in federal and District funding for the Metropolitan Branch Trail project that runs from Union Station to the District line, as requested by the District Department of Transportation (DDOT)

The TPB Bylaws provide that the Steering Committee “shall have the full authority to approve non-regionally significant items, and in such cases it shall advise the TPB of its action.”

Attachments

- SR7-2017
- SR8-2017

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO THE FY 2015-2020 TRANSPORTATION
IMPROVEMENT PROGRAM (TIP) THAT IS EXEMPT FROM THE AIR QUALITY
CONFORMITY REQUIREMENT TO INCLUDE FUNDING FOR THE EAST SPRING STREET
WIDENING AND VA ROUTE 28 WIDENING PROJECTS, AS REQUESTED BY
THE VIRGINIA DEPARTMENT OF TRANSPORTATION (VDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of the Fixing America's Surface Transportation (FAST) Act for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letters of September 1, 2016, VDOT has requested that the FY 2015-2020 TIP be amended to include \$705,000 in Advanced Construction (AC) for planning and engineering (PE) in FY 2016, \$2 million in AC for right-of-way acquisition (ROW) in FY 2017, and \$4 million in AC and matching funds for construction in FY 2018 for the widening of East Spring Street between Herndon Parkway and Fairfax County Parkway in Fairfax County; and to include \$5.859 million in National Highway Performance Program (NHPP) funding for PE in FY 2016, \$6.151 million in revenue sharing funds in FY 2016 (\$1.8 million for PE) and FY 2018 (\$4.351 million for ROW), and \$2.072 million in AC for ROW in FY 2018 for the VA Route 28 Widening project between the Prince William County Line and VA Route 29 in Fairfax County, as described in the attached materials, and

WHEREAS, these projects are already included in the Air Quality Conformity Analysis of the 2015 CLRP Amendment and the FY 2015-2020 TIP;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$705,000 in AC for PE in FY 2016, \$2 million in AC for ROW in FY 2017, and \$4 million in AC and matching funds for construction in FY 2018 for the widening of East Spring Street between Herndon Parkway and Fairfax County Parkway in Fairfax County; and to include \$5.859 million in NHPP funding for PE in FY 2016, \$6.151 million in revenue sharing funds in FY 2016 (\$1.8 million for PE) and FY 2018 (\$4.351 million for ROW), and \$2.072 million in AC for ROW in FY 2018 for the VA Route 28 Widening project between the Prince William County Line and VA Route 29 in Fairfax County as described in the attached materials.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

September 1, 2016

The Honorable Tim Lovain, Chairman
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4201

RE: FY 2015-2020 Transportation Improvement Program Amendment for TIP#6537, UPC 105521, Widen East Spring Street from 4 to 6 Lanes between Fairfax County Parkway & Herndon Parkway

Dear Chairman Lovain:

The Virginia Department of Transportation requests an amendment to the FY 2015-2020 Transportation Improvement Program (TIP) to program funding for UPC 105521, Widening East Spring Street between Fairfax County Parkway & Herndon Parkway. This project will reduce congestion on a heavily traveled section of Spring Street between two major roadways in Herndon, VA.

The amendment adds \$705,000 in Federal Advanced Construction (AC) funds for preliminary engineering in FY 2016, \$2,000,000 in AC funds for right-of-way in FY 2017, \$3,859,000 in AC funds for construction in FY 2018. The total project cost is estimated at \$6.7 million. VDOT staff has made appropriate revisions to the TPB's iTIP database.

While the proposed additional funds are new to the TIP, they are part of VDOT's total revenue estimates included in the 2014 CLRP update. This amendment will not impact regional air quality conformity, as the project was included in the most recently approved air quality conformity analysis.

VDOT requests approval of this TIP Amendment by the Transportation Planning Board's Steering Committee at its meeting on September 9, 2016. VDOT's representative will attend the meeting and be available to answer any questions about the amendments.

Thank you for your consideration of this request.

Sincerely,

Helen Cuervo, P.E.
District Administrator
Northern Virginia District

cc: Ms. Diane Mitchel, VDOT
Ms. Rene'e Hamilton, VDOT-NoVA
Ms. Maria Sinner, P.E., VDOT-NoVA
Mr. Norman Whitaker, AICP, VDOT-NoVA

VirginiaDot.org
WE KEEP VIRGINIA MOVING



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION

4975 Alliance Drive
Fairfax, VA 22030

CHARLES A. KILPATRICK, P.E.
COMMISSIONER

September 1, 2016

The Honorable Tim Lovain, Chairman
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002-4201

RE: FY 2015-2020 Transportation Improvement Program Amendment for TIP# 6450, UPC 108720, Widen VA 28 from 4 to 6 Lanes between Old Centreville Road and the Prince William County line

Dear Chairman Lovain:

The Virginia Department of Transportation requests an amendment to the FY 2015-2020 Transportation Improvement Program (TIP) to program funding to widen VA 28 from four to six lanes between Old Centreville Road and the Prince William County line. This project, which also includes intersection improvements and pedestrian/bicycle facilities, will reduce congestion on a heavily traveled section of VA 28 in Fairfax County.

The amendment adds \$5,859,627 in National Highway Performance Program (NHPP) funds, \$900,186 in Revenue Sharing funds and \$900,186 in matching funds for preliminary engineering in FY 2016. We are also adding \$2,175,849 in Revenue Sharing, \$2,175,849 in matching and \$2,072,446 in Advance Construction (AC) funds for the right-of-way phase in FY 2018. The total project cost is estimated at approximately \$69 million. VDOT staff has made appropriate revisions to the TPB's iTIP database.

While the proposed additional funds are new to the TIP, they are part of VDOT's total revenue estimates included in the 2014 CLRP update. This amendment will not impact regional air quality conformity, as the project was included in the most recently approved air quality conformity analysis.

VDOT requests approval of this TIP Amendment by the Transportation Planning Board's Steering Committee at its meeting on September 9. VDOT's representative will attend the meeting and be available to answer any questions about the amendments.

Thank you for your consideration of this request.

Sincerely,

Helen Cuervo, P.E.
District Administrator
Northern Virginia District, VDOT

cc: Ms. Diane Mitchel, VDOT
Ms. Rene'e Hamilton, VDOT-NoVA
Ms. Maria Sinner, P.E., VDOT-NoVA
Mr. Norman Whitaker, AICP, VDOT-NoVA

VirginiaDot.org
WE KEEP VIRGINIA MOVING

**NORTHERN VIRGINIA
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

	Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
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Primary

VA 28 Centreville Road

TIP ID: **6450** Agency ID: **108720** Title: **VA Route 28 Widening (Prince William County Line to Route 29)** Project Cost: **\$68,829** Complete: **2020**

Facility: VA 28 Centreville Road	AC	100/0/0					2,072 b			2,072
From: PW County Line	NHPP	100/0/0		5,859 a						5,859
To: Old Centreville Road	NVTA-PAYGO	0/100/0		5,000 a						5,000
	REVSH	0/50/50		1,800 a			4,351 b			6,151
Total Funds:										19,082

Description: Widen from 4 to 6 lanes including intersection improvements and pedestrian/bicycle facilities.

Amendment: Add Funding **Approved on: 9/9/2016**
 Add \$5.859 million in NHPP funding in FY 2016 for PE, \$6.151 million in Revenue Sharing funding in FY 2016 and FY 2018 for PE and ROW acquisition, and \$2.072 million in advanced construction funding for ROW acquisition in FY 2018.

Urban

Spring Street

TIP ID: **6537** Agency ID: **105521** Title: **Widen East Spring Street** Project Cost: **\$6,705** Complete: **2019**

Facility: Spring Street	AC	100/0/0		705 a	2,000 b					2,705
From: Herndon Parkway	AC 1	96/4/0					4,000 c			4,000
To: Fairfax County Parkway										

Total Funds: 6,705

Description: Widen Spring Street from 4 lanes to 6 lanes, FXCO PKWY ramp improvements, intersection improvements, sidewalk

Amendment: Add New Project **Approved on: 9/9/2009**
 Amend project into the FY 2015-2020 TIP with \$6.705 million in advanced construction and matching funds for PE, ROW acquisition, and construction in FY 2016-2018.

**NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD
777 North Capitol Street, N.E.
Washington, D.C. 20002**

**RESOLUTION ON AN AMENDMENT TO THE FY 2015-2020 TRANSPORTATION
IMPROVEMENT PROGRAM (TIP) THAT IS EXEMPT FROM THE AIR QUALITY
CONFORMITY REQUIREMENT TO INCLUDE FUNDING FOR THE METROPOLITAN BRANCH TRAIL
PROJECT, AS REQUESTED BY THE DISTRICT DEPARTMENT OF TRANSPORTATION (DDOT)**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), which is the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of the Fixing America's Surface Transportation (FAST) Act for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the TIP is required by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) as a basis and condition for all federal funding assistance to state, local and regional agencies for transportation improvements within the Washington planning area; and

WHEREAS, on October 15, 2014 the TPB adopted the FY 2015-2020 TIP; and

WHEREAS, in the attached letter of September 1, 2016, DDOT has requested that the FY 2015-2020 TIP be amended to include \$5.7 million in Congestion Mitigation and Air Quality (CMAQ) program funding for construction in FY 2016 and \$220,000 in federal demonstration funding for planning and engineering in FY 2016 for the Metropolitan Branch Trail project that runs from Union Station to the District line, as described in the attached materials; and

WHEREAS, this project is exempt from the air quality conformity requirement, as defined in Environmental Protection Agency's (EPA) Transportation Conformity Regulations as of April 2012;

NOW, THEREFORE, BE IT RESOLVED THAT the Steering Committee of the National Capital Region Transportation Planning Board amends the FY 2015-2020 TIP to include \$5.7 million in CMAQ program funding for construction in FY 2016 and \$220,000 in federal demonstration funding for planning and engineering in FY 2016 for the Metropolitan Branch Trail project, as described in the attached materials.

Adopted by the Transportation Planning Board Steering Committee at its regular meeting on September 9, 2016

Government of the District of Columbia

Department of Transportation



d. Policy, Planning and Sustainability Administration

September 1, 2016

The Honorable Tim Lovain, Chairperson
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street N.E., Suite 300
Washington, DC 20002-4290

Dear Chairman Lovain,

The District Department of Transportation (DDOT) requests that the FY 2015-2020 Transportation Improvement Program (TIP) be amended to add funding for the Metropolitan Branch Trail project.

The proposed amendment would add approximately \$6 million in Congestion Mitigation and Air Quality (CMAQ) program funds and \$300,000 in Demonstration funds in FY 2016 for the construction of the section of the Metropolitan Branch Trail near the Fort Totten Metrorail station. The Metropolitan Branch Trail project will provide a 6.25-mile bicycle/pedestrian trail from Union Station north to the District Line along the railroad right-of-way. This trail will connect at the District line with a route continuing into Silver Spring MD. This project is intended to serve both recreational users and commuters to meet Transportation Control Measures (TCMs) and air quality objectives.

The project does not add additional capacity for motorized vehicles and does not require conformity analysis or public review and comment. The funding sources have been identified, and the TIP will remain fiscally constrained. Therefore, DDOT requests that the TPB Steering Committee approve this amendment at its September 9, 2016 meeting.

We appreciate your cooperation in this matter. Should you have questions regarding this amendment, please contact Mark Rawlings at (202) 671-2234 or by e-mail at mark.rawlings@dc.gov. Of course, feel free to contact me directly.

Sincerely,

James Sebastian
Acting Associate Director, Planning and Sustainability Administration (PSA)

**DISTRICT OF COLUMBIA
TRANSPORTATION IMPROVEMENT PROGRAM
CAPITAL COSTS (in \$1,000)**

FY 2015 - 2020

Source	Fed/St/Loc	Previous Funding	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	Source Total
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DDOT

Bike/Ped

Metropolitan Branch Trail

TIP ID: **3228** Agency ID: **AF073A, ZU024A** Title: **Metropolitan Branch Trail** Complete: Total Cost: **\$7,432**

Facility: Union Station District Line	CMAQ	80/20/0	400 a		10,100 c	3,300 c			13,400
From:									
To:	DEMO	80/20/0	732 a	500 a	660 a	300 a			2,660
				1,200 c					

Total Funds: 16,060

Description: The Metropolitan Branch Trail project will provide a 6.25-mile bicycle/pedestrian trail from Union Station north to the District Line along the railroad right-of-way. This trail will connect at the District line with a route continuing into Silver Spring MD. This project is intended to serve both recreational users and commuters to meet Transportation Control Measures (TCMs) and air quality objectives.

- a. L & M St.
- b. Ft. Totten

Amendment: Increase FY 16 Construction **Approved on: 9/9/2016**
 Increase FY 16 Construction from \$4.4 Million CMAQ to \$10.1 Million CMAQ and Increase from \$400 to \$660 Thousand DEMO for a total FY 16 amount of \$10.8 Million



MEMORANDUM

TO: Transportation Planning Board
FROM: Kanti Srikanth, TPB Staff Director
SUBJECT: Letters Sent/Received
DATE: September 15, 2016

The attached letters were sent/received since the last TPB meeting.



National Capital Region
Transportation Planning Board

August 8, 2016

Gregory G. Nadeau
Administrator
Federal Highway Administration
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Carolyn Flowers
Acting Administrator
Federal Transit Administration
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Extension of Commenting Period for Docket No. FHWA-2016-0016

Dear Administrator Nadeau and Acting Administrator Flowers:

I am writing as the Chairman and on behalf of the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the Washington metropolitan area. The TPB is requesting that the US Department of Transportation (USDOT) extend the comment period for the Metropolitan Planning Organization Coordination and Planning Area Reform Proposed Rule (published June 27, 2016 Docket Number FHWA-2016-0016) by 60 days to October 26, 2016.

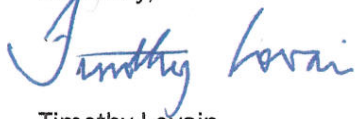
The proposed coordination rule would make far-reaching changes to the planning processes, practices, and common understandings that have been in effect since MPOs were first introduced in the Federal Highway Act of 1962 and in federal regulation since 1993. Compliance with this proposed rule would present major additional burdens and challenges to this and other MPOs across the country. Additionally, the proposed changes will impact the transportation planning and programming practices of the transportation agencies at the state and local levels. The 60-day extension we are requesting would give MPOs adequate time to review the proposed changes and to consult with the state and local transportation agencies that would also be affected by the changes.

Additionally, review of the proposed changes will be more complex because it must be undertaken within the context of recently released final planning regulations. The Metropolitan Transportation Planning Final Rule, issued only one month ago, did not reflect any of the changes to the MPO process proposed in the most recently proposed rule. MPOs are currently reviewing and commenting on the draft of the third set of rules related to Performance Based Planning and Programming, issued on April 22, 2016, with new requirements to assess the performance of the Interstate and non-Interstate NHS, to assess freight movements on the Interstate, and to assess traffic congestion and on-road mobile source emissions. Comments on this proposed rule is due August 20, 2016.

Mr. Gregory G. Nadeau and Ms. Carolyn Flowers
August 5, 2016

The TPB and its staff would appreciate your favorable consideration of this request, and we look forward to working with USDOT to provide substantive and helpful input on this notice of proposed rulemaking. If you have any questions or would like to discuss this matter further, please contact the TPB's staff director Kanti Srikanth at ksrikanth@mwkog.org or 202-962-3257.

Sincerely,



Timothy Lovain
Chairman
National Capital Region Transportation Planning Board



National Capital Region
Transportation Planning Board

August 19, 2016

The Honorable Gregory G. Nadeau
Administrator
Federal Highway Administration (FHWA)
U.S. Department of Transportation (USDOT)
1200 New Jersey Avenue, SE
Washington, DC 20590

Subject: Comments on the Proposed National Performance Management Measures to Assess Performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program [Docket No. FHWA-2013-0054]

Dear Administrator Nadeau,

The National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the Metropolitan Washington Area, appreciate your efforts and those of FHWA staff to provide opportunities for commenting on the Proposed National Performance Management Measures to Assess Performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program. Our comments on the following areas of the proposed rule, along with recommended alternatives where appropriate, for your consideration are provided below.

Subpart E: Performance of the National Highway System and Subpart G: Traffic Congestion

§ 490.105 (d) (2) and (e) (8) Urbanized area targets

(2) State DOTs and MPOs shall establish a single urbanized area target that represents the performance of the transportation network in each area applicable to the measures, as specified in 23 CFR sections—

- (i) 490.503(a)(2) for the peak hour travel time measures identified in § 490.507(b)(1) and § 490.507(b)(2); and
- (ii) 490.703 for the traffic congestion measure identified in § 490.707.

(8) *Urbanized area specific targets.* — The following requirements apply to establishing targets for the peak hour travel time measures specified in paragraph (c)(5) and traffic congestion measure in paragraph (c)(7) of this section...

The Urbanized Area (UZA) boundary determination process of the Census Bureau is not well understood and importantly does not appear to be based on transportation and mobility considerations within the UZA. Additionally, the Census UZA does not align with jurisdictional boundaries which in most places is where preliminary transportation project planning and programming decisions are made. Finally, the basic unit used for developing UZAs, census blocks, differs from the basic unit used by MPOs, Transportation Analysis Zones (TAZs).

Accordingly, TPB recommends requiring reporting of the performance measures proposed for UZA using the metropolitan planning area as the area of responsibility. This would affect the measures for Peak Hour Travel Time (Percent of Interstate System/ non-Interstate NHS where Peak Hour Travel Times meet expectations) and the measure of Annual Hours of Excessive Delay Per Capita for NHS roads, subsequently specified in Subparts E and G respectively.

Subpart F: Measures to Assess Freight Movement on the Interstate System

§ 490.611 (c) (2): The method to calculate Average Truck Speed

The Average Truck Speed shall be calculated for each reporting segment as follows: [formula and definitions of terms]. This formula uses the Arithmetic Mean to calculate the Average Truck Speed of a reporting segment in a calendar year.

Studies and practice have shown that the Arithmetic Mean could lead to 1) inconsistent Average Speed and Average Travel Time of the same segment in the same analysis period, and 2) higher-than-ground truth Average Speed. Also from a traffic engineering perspective, segment-based probe speed is Space Mean Speed, and location-fixed spot speed is Time Mean Speed. Harmonic Mean should be used to average Space Mean Speed and Arithmetic Mean should be used to average Time Mean Speed. The Highway Capacity Manual recommends Space Mean Speed for segment based analysis.

Accordingly, TPB recommends Harmonic Mean be used to calculate the Average Truck Speed, and the calculation formula is:

$$\text{Average Truck Speed (s)} = \frac{T}{\left[\sum_{b=1}^T \frac{\text{Truck Travel Time}_b}{\text{Segment Length (s)}} \right]} \times 60 \times 60$$

The following example demonstrates the difference between the two speeds.

Assume Segment Length (s) = 1 mile, in one 5-minute time interval, Truck Travel Time = 120 seconds, in another 5-minute interval, Truck Travel Time = 60 seconds.

The Average Truck Speed calculated by the NPRM (Arithmetic Mean) is:

$$\text{Average Truck Speed (s)} = \frac{\frac{1}{120} + \frac{1}{60}}{2} \times 60 \times 60 = 45 \text{ mph}$$

However, the Average Travel Time of the two interval is (120+60)/2 = 90 seconds, which corresponds to Average Truck Speed = (1 mile / 90 seconds) x 60 x 60 = 40 mph.

Obviously, 45 mph > 40 mph.

By using Harmonic Mean as recommended, the above inconsistency disappears:

$$\text{Average Truck Speed (s)} = \frac{2}{\frac{1}{120} + \frac{1}{60}} \times 60 \times 60 = 40 \text{ mph}$$

The difference between the Arithmetic Mean and the Harmonic Mean of the same samples could be significant. Mathematically, Arithmetic Mean >= Harmonic Mean is always true.

For more information, please refer to Pu, W. (2013), Standardized Data Processing: When Is It Needed in the Mining of Private-Sector Probe-Based Traffic Data to Measure Highway Performance? *Transportation Research Record: Journal of the Transportation Research Board*, Vol. 2338, pp.44-57.

§ 490.613 (c): Threshold to determine (un)congested freight movement on Interstates

g: An uncongested Interstate System reporting segment. An uncongested reporting segment is where calculated Average Truck Speed for the reporting segment, in § 490.611(c) (2), is greater than 50.00 mph.

The specification of 50.00 mph as the speed below which road segments are considered as congested for freight will not produce a useful performance measure for the TPB metropolitan planning area. There are significant segments of the Interstate roadways with posted speed limits less than 50 mph, as well as on steep grades where trucks (especially laden trucks) may be expected to average less than 50 mph even in non-congested traffic conditions. As an example, in the District of Columbia, several segments of the Interstate highways system have a speed limit of 45 mph. Such posted speed limits reflect localized operating, design and safety considerations. According to the proposed rule these segments would be considered congested even when the operating speeds are in adherence with the posted speed limit.

The TPB recommends that a percentage of posted speed limit be set as the threshold, in lieu of a fixed threshold speed, to determine if freight movement on Interstates is congested.

Subpart G: Measures to Assess the Congestion Mitigation and Air Quality Improvement Program – Traffic Congestion

§ 490.711 (c): Threshold to determine if excess delay occurs

The threshold speed is 35 mph for Interstates/freeways/expressways, and 15 mph for principal arterials and all other NHS roads.

- The two thresholds are not flexible enough to reflect the different operating characteristics of different segments of the NHS, including speed limits that are established for hills, urban centers, major cloverleaf-type intersections, and other locations. Accordingly, and consistent with its recommendation for § 490.613 (c), the TPB recommends a percentage of the posted speed limit be used as the threshold to determine excess delays.

Subpart H – Measures to Assess the Congestion Mitigation and Air Quality Improvement Program- On-Road Mobile Source Emissions.

TPB staff notes the following observations in general to the proposed establishment of criteria pollutant emissions reduction targets specific to CMAQ funds.

Federal transportation funding authorization, starting with MAP-21 (Pub. L. 112-141) followed by the FAST Act (Pub. L. No. 114-94), has transformed the Federal-aid program by establishing new requirements for performance management to support improved investment decision-making through a focus on performance outcomes for key national transportation goals. The performance

measures and targets proposed to date under this initiative generally allow for measuring the performance outcomes within specific topic areas and relative to the targets within the topic area. For example, establishment of targets for the pavement condition is measurable and can be examined in the context of investment made in the program area. The proposal to establish criteria pollutant emissions reductions targets, however, does not appear to provide for such an assessment. Specifically, the proposal calls for establishing quantitative reductions in the amount of emissions of criteria pollutants from only those projects receiving CMAQ funds. While a target of annual tons of emission reductions by CMAQ funded project for each applicable criteria pollutant could be established, it is not clear how measured emissions levels reflecting contribution from all source sectors can be dissected to discern the contribution specifically from CMAQ funded projects and determine if the targets have been achieved.

TPB staff also observes that the National Ambient Air Quality Standards established under the Clean Air Act (42 U.S.C. 7401 et seq.) and its implementation through the designation of Non-attainment and Maintenance areas does establish specific targets with regard to emissions levels of criteria pollutants. While these targets are not specific to the transportation sector, they are multi-sectoral and applicable system wide and are measurable. Additionally, current regulations governing the use of CMAQ funds does require quantification and reporting of estimated emissions reductions from CMAQ funded projects. These requirements should be retained and strengthened to provide a consistent set of definitions and methodology for emissions estimation and reporting.

With regard to the proposed measure in Subpart H that reflects emission reductions through the delivery of CMAQ funded projects, TPB recommends that US DOT fully complete the various activities needed to facilitate the implementation of this specific rule ahead of finalizing the rule. Finalizing the rule will trigger the statutory implementation timeframes but would not have made the means of complying with the requirements available to the States and MPOs. The proposed rule acknowledges many of these outstanding enabling activities and include:

1. Establishing a consistent technical methodology to estimate emissions reductions from various types of CMAQ eligible projects. As recognized by the FHWA and the FTA there is no consistent method being used across the country at this time. It is strongly preferable that a standardized CMAQ emissions reductions estimation procedure be developed to assist with consistency and completeness of emissions estimates, for those project types where it is possible to quantify emissions, This could be aided by having FHWA develop a regional or national default look-up table providing emissions reduction estimates for various smaller CMAQ eligible projects. With this approach, project specific emissions estimates would still be conducted for projects that have a larger scope or impact but would be simplified for smaller projects, thus streamlining the CMAQ reporting process.
2. Standardizing the CMAQ Public Access System (PAS) database that the proposed rule requires states and MPOs to use in establishing emissions reduction targets. The issues with the CMAQ Public Access System (PAS) that need to be addressed include: (a) CMAQ funded projects either not listed or listed with no emissions estimates (b) projects listing emissions benefits in the year in which CMAQ funding is first obligated, but does not indicate the year when the emissions benefits for a project would be realized; (c) listing of one emissions benefit figure without accounting for change/variability to emissions over time.

Mr. Gregory G. Nadeau
August 19, 2016

3. Enhancing functionality of the PAS database to include (a) amending previously reported emissions data to account for programs (i.e., Tier 3) not included in the original estimates; and (b) integration of PAS with performance related data such as a spatial component.

The TPB recognizes the importance of the performance provisions of MAP-21 as recently set forth in the final rule on Statewide and Nonmetropolitan Transportation Planning; Metropolitan Transportation Planning from the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA). We welcome the move towards a performance-driven, outcome based approach to transportation planning. The TPB strongly endorses flexibility with the performance-based approach in FHWA rulemaking, and believes that it is highly preferable to more prescriptive regulations which could prove unduly onerous and difficult to implement. Specifically, a flexible approach would enable the TPB to carry out effective performance based planning and programming consultation with all regional transportation agencies and local governments.

Please feel free to contact me at ksrikanth@mwkog.org or 202-962-3257 if there is any additional information or support that the TPB can provide in the development and implementation of the performance-based planning and programming regulations.

Sincerely,



Kanti Srikanth
Staff Director, National Capital Region Transportation Planning Board
Director, Department of Transportation Planning, Metropolitan Washington Council of Governments

Government of the District of Columbia

Department of Transportation



August 19, 2016

Gregory G. Nadeau
Administrator, Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Docket No. FHWA-2013-0054

Dear Administrator Nadeau:

The District of Columbia Department of Transportation (DDOT) is pleased to provide comments on the Federal Highway Administration (FHWA) “National Performance Management Measures to Assess Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program” proposed rule (Docket Number FHWA-2013-0054), published in the Federal Register on April 29, 2016. We appreciate the efforts of the FHWA staff to provide opportunities for commenting on this proposed rulemaking.

DDOT is a unique agency that is simultaneously a state and local department of transportation (DOT) and serves an entirely urban jurisdiction. We particularly emphasize how the proposed rule should be changed so that urban areas with multimodal transportation systems will not be measured against inappropriate standards. In addition, the District of Columbia (the District) is at the center of a tri-state region and we wish to emphasize the importance of creating measures that can work across jurisdictions, so our Metropolitan Planning Organization (MPO) can effectively set targets and measure system performance for all member jurisdictions.

We are generally supportive of the comments submitted by the American Association of State Highway and Transportation Officials (AASHTO) and the National Capital Region Transportation Planning Board (TPB), our MPO. In particular, we wish to emphasize the following areas:

The speed thresholds proposed do not reflect urban conditions.

The threshold for uncongested freight movement (§490.613 (c)) is proposed to be 50 mph. This will not produce a useful performance measure for the District because we do not have any segments of the Interstate signed above 50 mph, and a significant share of them are signed below that speed.

Similarly, the thresholds to determine if excess delay occurs (§490.711 (c)) are proposed to be 35 mph for Interstates/expressways/freeways and 15 mph for all other NHS roads. These two thresholds do not reflect the operating characteristics of urban areas. Some portions of our Interstates are signed at 35 mph and nearly all of our non-Interstate NHS roads are signalized arterials. Due to this signalization, 15 mph can be the uncongested average speed over the length of these corridors, not a threshold for excess delay. Higher speeds on these NHS segments can actually run counter to safe operating conditions in our dense, complicated, urban environment

To measure our system against these thresholds would not provide useful data points to gauge performance. DDOT recommends that a percentage of posted speed limit be set as the threshold, in lieu of a fixed threshold speed, for both measures.

Flexibility is essential

We support the AASHTO comments that states should be provided with the flexibility to use measurement and target setting approaches that mitigate the effects of weather events and construction projects.

As noted in the AASHTO comments, applying congestion measures to uncongested rural areas is unduly burdensome. By the same token, we would suggest that non-Interstate NHS routes within the most urban areas should similarly be exempted from some or all of the measures. We recognize that congestion may be an issue on these segments, but the level of incremental improvement possible is difficult to capture in the measures as proposed. Also, failure to consider all modes using those roadways works counter to efforts to increase person throughput and encourage the use of non-automobile modes more generally.

Urban arterials often have bicycle, transit, and personal vehicles sharing the same limited roadway. Cities are choosing to improve system performance overall by prioritizing transit and improving bicycle and pedestrian safety, which increase the corridor throughput but could cause the vehicle-based measures of congestion to worsen. A person throughput measure would be more appropriate on these facilities.

Create measures that support the target setting approach in the final planning rule.

The final planning rule spelled out the coordination process between states and MPOs for target setting. The measures that are set in this rule need to allow for reasonable coordination in the target setting process. DDOT is the only state DOT that is entirely contained within a single MPO, and the TPB includes the District, Maryland, and Virginia. Performance measures need to be applicable across all parts of the MPO in order to set MPO-level targets. Focusing performance measurement on limited access or non-urban NHS segments would better allow collaborative target setting in a diverse urban region.

Per capita measures do not reflect the true population impacted.

The proposed hours of excessive delay per capita measure does not accurately reflect the true population impacted by the delay. The daytime population of the District doubles, with over half a million commuters and often over 100,000 visitors coming in on a daily basis. Measuring per capita delay based on residents would underestimate the actual population affected by these measures and therefore overestimate the delay each person experiences.

A preferable approach would use actual person counts, or vehicular volumes, on the measured corridors.

The freight travel time and overall vehicle travel time measures are redundant.

The proposed truck travel time reliability (TTTR) measure is nearly identical to the level of travel time reliability (LOTTR), but with different thresholds and is measured all day instead of during the peak hours. Truck travel during the peak will be affected by the same congestion as general vehicles. Targeting the measurement period to off-peak periods would isolate the impact on goods movement from general peak hour delays associated with commuting.

The measures do not reflect the multimodal nature of urban transportation.

We are committed to achieving the best possible transportation system performance within our available resources and have embarked on our own efforts to create a more holistic measure of system performance from a congestion and mobility perspective. In September, we will be launching DistrictMobility.org with measures of congestion, reliability, and accessibility for all surface modes – vehicular, transit, bicycle, and pedestrian.

The measures selected for this monitoring effort were particularly chosen to rely on available, repeatable, reliable data. Nonetheless, much effort was needed to make the datasets comparable across modes and to find measures that were meaningful for each mode. There remains more work, but we would hope that FHWA would consider our project’s report and the lessons learned from that effort when exploring future multimodal measures for the transportation system. For reference, the measures we are employing are:

Category	Measure	Outputs	Temporal	Modes
Commuting	Commute Mode Split	<ul style="list-style-type: none"> Percent of commuters using mode 	Daily average	Pedestrian Bicycle Transit Auto
	Commute Time	<ul style="list-style-type: none"> Average commute time Commute time distribution 	Daily average	Pedestrian Bicycle Transit Auto Overall

Category	Measure	Outputs	Temporal	Modes
Reliability	Auto Travel Time Reliability	<ul style="list-style-type: none"> • Top 10 most reliable/unreliable roads by planning time index, arterials and freeways separately • Planning time index for arterials 	<ul style="list-style-type: none"> • AM & PM peak • Over the day and over the week 	Auto
	Bus On-Time Performance	<ul style="list-style-type: none"> • On-time performance for all bus routes in the District 	Over the day (can do up to 15 min increments)	Bus
Intensity of Use	Roadway Congestion	Auto travel time index	Over the day and over the week	Auto
	Bus Ridership	<ul style="list-style-type: none"> • Average bus stop level activity by time period • Route level ridership – citywide and top 10 routes 	<ul style="list-style-type: none"> • Over the day (by time period) • Daily 	Bus
	Bus Overcrowding	<ul style="list-style-type: none"> • Top 10 most crowded bus routes • Maximum load per route, by time period, on roadway links 	Over the day (by time period)	Bus
	Bus Travel Speed (Time)	Average bus speeds per route	15-minute intervals	Bus
	Corridor Intensity (Persons)	Number of persons per corridor	Daily	Transit/ Auto
Accessibility/Connectivity	Transit System Coverage	<ul style="list-style-type: none"> • Walksheds to all transit service (0.5 miles to Metrorail, 0.25 miles to bus) • Walksheds to high frequency transit service 	Over the day and over the week	Transit
	Bikeshare System Coverage	Walksheds to bikeshare stations (0.25 miles)	N/A	Transit Bicycle
	Bike System Coverage	Walksheds to a bicycle facility, including low-stress streets and bikeshare stations (0.25 miles or 2 minute ride)	N/A	Bicycle
	Walkability Index	Scores based on walkability methodology	N/A	Pedestrian
	Accessibility to Jobs	Number of jobs accessible by mode	AM Peak	Pedestrian Transit Auto

In our next phase of this project we plan to develop a person throughput measure, which we have noted above is needed for understanding the affected population. We have also proposed to develop a measure of modal options available to individuals.

DDOT encourages consideration of specific non-auto metrics such as those above. It is essential that a holistic approach to performance measurement develop metrics associated with bicycling and walking.

For the accessibility to jobs measure in our study, we are relying on the work done by the University of Minnesota in their National Accessibility Evaluation Pooled Fund Study and would encourage FHWA to consider leveraging the work they have done in developing that dataset.

Thank you again for the opportunity to comment on this important proposed rulemaking. DDOT is committed to a performance-based approach to transportation, and we look forward to working closely with FHWA on this endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Zimbabwe', with a stylized flourish at the end.

Samuel Zimbabwe
Associate Director, Planning & Sustainability Administration
District Department of Transportation



Maryland Department of Transportation
The Secretary's Office

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Pete K. Rahn
Secretary

August 19, 2016

Mr. Gregory G. Nadeau
Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington DC 20590

Re: Docket No. FHWA-2013-0054

Dear Administrator Nadeau:

The Maryland Department of Transportation (MDOT) is pleased to submit comments on the Federal Highway Administration's (FHWA) "National Performance Management Measures; Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program: Proposed Rule FHWA-2013-0054," published in the Federal Register on April 22, 2016.

MDOT looks forward to the finalization of this rule as part of a comprehensive set of measures required by the Moving Ahead for Progress in the 21st Century (MAP-21) law. MDOT is proud of its work in transportation performance management and believes that this national focus will encourage growth in the state of practice and the development of data and analytical approaches.

As a member of the American Association of State Highway and Transportation Officials (AASHTO), MDOT participated in the development of comments submitted by states through AASHTO. MDOT is supportive of AASHTO's comments related to improved data and enhanced guidance from FHWA on target setting and Metropolitan Planning Organization (MPO) coordination. MDOT also strongly agrees with AASHTO that the national measures should be limited to those required by statute.

However, MDOT also appreciates the challenges in developing national measures and in applying a data set that is nationally consistent for states and MPOs. MDOT believes that FHWA's intent in responding to the MAP-21 law requirements is to capture the most meaningful and applicable measures for federal reporting that states and MPOs can perform in alignment with a state or MPO's own performance programs. In this respect, MDOT looks forward to the finalization and implementation of the measures.

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MDOT offers the following principal comments on the NPRM:

MDOT is aware of several entities that are providing analytical and visualization tools related to the MAP-21 measures, and MDOT encourages FHWA to consider a national-level tool for consistent measurement and reporting. MDOT is experimenting with options and finds that using a pre-developed analytical tool could reduce the burden to states significantly. For example, MDOT has been experimenting with the University of Maryland's Regional Integrated Transportation Information System (RITIS) program, which has loaded the National Performance Management Research Data Set (NPMRDS) data and is developing the codes necessary to produce tabular and map results of the proposed performance measures. If MDOT had to calculate the measures individually, this effort would take a significant amount of staff time and results could differ between analysts depending on assumptions and methods used. MDOT understands that FHWA intends to provide training and guidance on calculating the measures exactly. However, MDOT encourages FHWA to consider providing analytical and visualization tools for measure calculation that could either transmit data to the Highway Performance Monitoring System (HPMS) or produce the resulting data in a way that easily translates to a state's HPMS for submittal as required.

MDOT believes that having an analytical and visual/geo-spatial platform for these measures would allow for better coordination and target setting due to the ability to visualize and display measure results for easy discussion on targets and areas for improvement. This information, in this format, also would serve states and MPOs well when developing and coordinating on the required reports, plans and programs.

MDOT encourages FHWA to consider recommendations offered in AASHTO's docket comments (**Appendix A**) for improvements to the NPMRDS. MDOT has spent considerable time analyzing the NPMRDS data and testing it internally. The Appendix A recommendations would strengthen the NPMRDS moving forward.

MDOT is especially concerned with the NPMRDS relationship to HPMS and encourages FHWA to provide the NPMRDS in a format that easily conflates to HPMS. MDOT understands that the next generation NPMRDS contract may require conflation to HPMS, which would make using the data for MAP-21 measures and beyond much easier for states.

MDOT encourages FHWA to clarify and provide guidance on MPO coordination for the peak hour and CMAQ measures. MDOT finds the proposed level of coordination rather nebulous as a majority of the MPOs in Maryland cross state lines and coordinating on setting one target for the urbanized area could be quite challenging. MDOT expects that FHWA's plans for training and guidance materials will specify best practices and clear steps for how these measures are implemented and how to negotiate targets.

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With respect to consideration of a Greenhouse Gas (GHG) emissions measure, Maryland acknowledges that it is necessary to address GHG emissions and recommends that FHWA consider developing guidance, in lieu of regulations, at this time. We believe this is an important issue and offer highlights describing how Maryland is working collaboratively to track and reduce state-wide CO₂ emissions in the transportation sector.

Maryland has adopted the Greenhouse Gas Emission Reduction Acts of 2009 and 2016, which strives to understand the science behind climate change, addresses the associated impacts, and mitigates CO₂ and other greenhouse gas (GHG) emissions from all sectors. The 2016 reauthorization will drive an economy-wide reduction of GHG emissions of 40% by 2030 while supporting a strong economy and job creation in Maryland.

Emissions reductions from the transportation sector will be an integral part of the overall reductions required to meet Maryland's long-term GHG reduction goals. MDOT has been actively engaged in the Maryland Commission on Climate Change (MCCC), chaired by the Maryland Department of the Environment (MDE), and has been working with MDE since 2009 to develop transportation GHG inventories and forecasts, and to estimate the emissions reductions associated with current and proposed transportation policies and programs.

MDOT and MDE have worked together to draft a public report that communicates the progress Maryland has made toward meeting our emission reduction goals for GHGs and other air pollutants through vehicle and fuel efficiency standards. These emission reductions are being accomplished with: diesel retrofits, electric vehicle incentives, MPO and Baltimore Port initiatives, transit-oriented development and other programs that would reduce mobile source emissions. This report would identify any additional work needed to achieve further reductions in the transportation sector while supporting a strong Maryland economy and job growth. You can access the report, entitled "*Charting the Path Forward: A Transportation Strategy for Meeting Long-term Air Quality and Greenhouse Gas Emissions Goals and Enhancing Maryland's Economy and Quality of Life*" at:

http://www.mdot.maryland.gov/newMDOT/Environmental_Programs/Documents/MDOT_AQ_Final_07_28_2016.pdf.

MDOT respectfully offers the following responses to address several of the specific questions posed by FHWA.

1. *Effective Dates*

Question: FHWA seeks comment from the public on what an appropriate effective date(s) could be.

Answer: Although MDOT is ready to implement the required measures, MDOT does support AASHTO's recommendation that FHWA consider a phased approach, which includes a two-year testing period following the effective date of the final rule to allow state DOTs and MPOs to develop non-binding targets in order to more fully understand the use of the data and the implications of those targets.

2. *Maximize Opportunities for Successful Implementation*

Question: FHWA encourages comments on how it can help maximize opportunities for successful implementation.

Answer: MDOT believes that FHWA's provision or endorsement of an analytical tool would greatly help states and MPOs in calculating measures and setting targets. Analytical tools such as the RITIS program would help in the accurate calculation of the metrics and measures and aid in visualization of the measures for target setting. They also may assist in transmitting the data to HPMS or directly to FHWA. Additionally, these tools might encourage growth in performance measurement and management beyond MAP-21 as they would provide a consistent platform for states and MPOs when evaluating performance.

3. *Use and Availability of Performance Throughput Data*

Question: FHWA seeks comment on the use and availability of performance throughput data (e.g., Traffic Throughput Data).

Answer: MDOT concurs with AASHTO's assessment that the data and methodologies to calculate a throughput measure do not currently exist. MDOT prefers that measures involving performance throughput data be used by state and local agencies for their purposes as they see fit.

4. *Limitations in the Availability of Data and Potential Data Sources and Technologies Related to System Performance and Traffic Congestion Measures*

Question: The FHWA is seeking comment on approaches for gathering throughput data for traffic congestion that would capture the total number of travelers passing through segments that make up a full system on a regular basis.

Answer: MDOT continues to work with federal and state partners, as well as the Transportation Research Board (TRB), private sector data providers and academics to improve data sources for transportation measurement. MDOT is not in a position to offer a specific recommendation at this time for these areas of data. Like AASHTO, MDOT supports an AASHTO, state and MPO discussion on data sources and improvement opportunities.

5. *Improve Missing Data and Outlier Impacts*

Question: The FHWA is seeking comment on opportunities to improve missing data and outlier impacts.

Answer: MDOT understands the challenges presented to FHWA in having to establish metrics and measures that all states and MPOs must implement and the need to have a nationally consistent data source. While the currently proposed NPMRDS does have limitations, MDOT views the NPMRDS as a nationally consistent database that can be used for the proposed measures by all states and MPOs. MDOT encourages opportunities for FHWA to engage states and MPOs in data development discussions, especially for freight data. As an example, MDOT encourages FHWA to seek ways by which private data providers could improve on differentiating vehicle types in probe data to enhance the current truck probe data offered by the private sector.

6. *Impact of Traffic Volumes on Travel Time Derived Measures*

Question: The FHWA is seeking comments on this approach and encourages comments suggesting alternative methods that may more effectively capture the impact of performance changes on differing levels of system use.

Answer: MDOT supports AASHTO's recommendation related to the instability in calculating the volume-based measure and the need for a volume-limiting function within the proposed performance measure as noted in AASHTO's Appendix B, "AASHTO Recommendations on Simplifying the Measures Used for Performance of the NHS, Freight Movement and Delay to the Extent they are Applicable."

7. *Focus on Large Urbanized Areas for Assessing the Performance of the NHS and Traffic Congestion*

Question: The FHWA is requesting comments on whether a population threshold should be used for determining the measure applicability; and if so then whether 1 million is the appropriate threshold, or whether another threshold (e.g., population over 200,000) would be more appropriate.

Answer: MDOT strongly supports AASHTO's recommendation for the 1 million population threshold and encourages FHWA to adopt this threshold for the calculation of both CMAQ measures.

8. *Starting with Highways and Expanding to other Surface Transportation Modes for Assessing Traffic Congestion*

Question: FHWA would like to move to a measure in the future that would consider the mobility of travelers using all surface modes of transportation and is seeking comment on feasible approaches that can be taken to move toward the development of such as measure.

Answer: MDOT supports a focus on measures that are currently required in statute. States and MPOs are currently engaged in the development of data and new forms of measurement. FHWA should focus limited resources on the statutory requirements while encouraging continued innovation in measurement practices that states and MPOs may use for comprehensive measurement programs in their jurisdictions.

9. *Dealing with Missing Data when Assessing On-Road Mobile Source Emissions*

Question: State DOTs and/or MPOs would not be required to amend their project information, but we also are soliciting comments on other ways State DOTs and/or MPOs may update or amend their project information with quantitative emissions estimates for use in implementing this performance measure.

Answer: MDOT supports AASHTO's recommendations for improvements to the CMAQ Public Access System.

10. *Optional Additional Targets for Urbanized Areas and the Non-Urbanized Area*

Question: The FHWA is seeking comments on this approach for establishing optional additional targets for urbanized areas and the non-urbanized area.

Answer: MDOT concurs with AASHTO's recommendation that "FHWA has asserted that if States engage in setting non-required targets, they must report to FHWA in FHWA approved formats. As a result of this approach, in order to avoid needless FHWA regulation, States that desire to undertake such additional planning are left with having to find a way to engage in the additional planning without using the word "target" (or perhaps even the words "measure" or "performance management") to describe the work in order to be able to take other steps that are relevant for its own needs without being subject to FHWA's recordkeeping and other regulatory requirements with respect to this self-initiated work. Thus, AASHTO recommends that FHWA strike (i), (ii), (iii), (iv), and (v) and make any other needed modifications so that the regulations do not discourage a

State DOT from establishing additional targets or undertaking additional performance management.”

11. Voluntary Establishment of Additional Targets

Question: The FHWA also would like comments on any other flexibility it could provide to or identify for State DOTs related to the voluntary establishment of additional targets. Some examples include:

- a. Providing options for establishing different additional targets throughout the State, particularly for the States’ non-urbanized area; and
- b. Expanding the boundaries that can be used in establishing additional targets (e.g., metropolitan planning area boundaries, city limit boundaries).

Answer: MDOT supports AASHTO’s recommendation that FHWA strike (i), (ii), (iii), (iv), and (v) and make any other needed modifications so that the regulations do not discourage a State DOT from establishing additional targets or undertaking additional performance management.

12. Target Establishment Options and Coordination Methods

Question: The FHWA seeks comments on target establishment options and coordination methods that could be used by MPOs and State DOTs in areas where the MPO metropolitan planning area crosses multiple States.

Answer: MDOT believes that there are currently significant unknowns about the process MPOs and State DOTs will undertake to coordinate on target setting. Until that process actually occurs, it is difficult to suggest options that would be useful. An analytical tool with visualization capabilities would help States engage MPOs in discussions to see what performance looks like in MPO areas, especially those that cross state boundaries, to engage in meaningful target setting discussions.

13. State DOT and MPO Coordination

Question: FHWA is specifically requesting comment on the following questions related to State DOT and MPO coordination in light of the proposed performance management requirements in this rule:

- a. What obstacles do states and MPOs foresee to joint coordination in order to comply with the proposed requirements?
- b. What mechanisms currently exist or could be created to facilitate coordination?
- c. What role should FHWA play in assisting States and MPOs in complying with these proposed new requirements?
- d. What mechanisms exist or could be created to share data effectively between states and MPOs?

- e. Are there opportunities for states and MPOs to share analytical tools and processes?
- f. For those states and MPOs that already utilize some type of performance management framework, what are best practices that they can share?

Answer: MDOT generally supports AASHTO's recommendations made in the principal comments section of AASHTO's comments to the docket. MDOT strongly supports the provision of analytical tools and visualization systems so that states and MPOs can see the data in a consistent manner. One best practice that the I-95 Corridor Coalition states can offer is the use of the RITIS system developed by the University of Maryland. RITIS is capable of importing the NPMRDS data with geographic data to run the measures as required by the proposed rulemaking. In doing so, this system can generate both tabular data and maps that help to visualize which National Highway System (NHS) segments are not meeting the thresholds as proposed in this rule. This system is a very helpful tool that states and MPOs could use to support this work if provided nationally and consistently to all who are responsible for reporting. MDOT suggests that FHWA consider providing analytical and visualization tools for the required MAP-21 rules.

14. Alternative Approaches to Implementation

Question: The FHWA is seeking comment on alternative approaches that could be considered to effectively implement 23 U.S.C. 134(h)(2)(B)(i)(I) and 23 U.S.C. 150(d)(2) considering the need for coordination required under 23 U.S.C. 134(h)(2)(B)(i)(II) and 23 U.S.C. 135(d)(2)(B)(i)(II).

Answer: MDOT supports AASHTO's recommendations for implementation made under their principal comments section.

15. Specificity for MPO and State Coordination

Question: The FHWA also is requesting comment on whether the regulations should include more information or specificity about how the MPOs and states should coordinate on target establishment. For some measures in this proposed rule, MPOs could establish targets up to 180 days after the state DOT establishes its targets.

Answer: AASHTO's comments on the rule focus on challenges with target setting between state DOTs and MPOs. MDOT looks for guidance and assistance from FHWA in setting targets and communicating with MPOs. As previously suggested, the use of visualization and analytical tools would facilitate the discussion and could be helpful to identify areas where performance challenges exist across borders so that states and MPOs can have a meaningful discussion on how to set targets.

16. MPA Description

Question: The FHWA seeks comment on whether the description of the MPA in place when establishing targets should be included in the system performance report and apply to the entire performance period.

Answer: MDOT strongly supports AASHTO's position that "the urbanized area geography is not well understood and the specific use of it in calculating the congestion metric involves a significant learning curve that will take time to better understand. Furthermore, FHWA has proposed significant changes to the definition of a Metropolitan Planning Area under the Metropolitan Planning Organization Coordination NPRM. At this time, it is difficult, if nearly impossible, to understand what the consequences of the urbanized areas and MPA definitions will have on target setting."

17. Future Measure of Congestion

Question: The FHWA encourages public comment on the following issues related to the measure approach and methods that can be used to realize a "future" measure of traffic congestion.

Answer: MDOT supports AASHTO's position that FHWA must focus on developing measures that are explicitly required in current statute. Thus, FHWA should not focus limited resources on the development of future national-level measures.

Question: Are there existing methods that can be used reliably to weigh the highway delay metric by "total vehicle occupants" rather than "total number of vehicles?" Are there technologies or methods that could be advanced in the next 3-5 years to capture vehicle occupancy data?

Answer: MDOT supports AASHTO's comments on existing methods and technologies or methods that could be advanced to capture vehicle occupancy data. "AASHTO proposes two different thoughts on this topic. First, average vehicle occupancy data has declined over the past 30 years. According to National Household Travel Survey (NHTS) data, work-trip vehicle occupancy (carpooling) is approximately 1.13, only 13 passengers ride with every 100 vehicle drivers. Approximately half of these 13 passengers are fellow commuters; the other half are persons sharing the ride for other trip purposes such as being dropped off at school. For all trips, vehicle occupancy rates range from 1.06 (New Hampshire) to 1.14 (Washington, DC). Thus, using these types of estimated and volume data will be a good representation of actual vehicle occupancy. Second, the state DOTs have funded the development of the Census Transportation Planning Products (CTPP) Program that develops robust work-based trip data. One important piece of data that is available from these calculations is total number of

Mr. Gregory G. Nadeau
Page Ten

workers commuting by car (either alone or as part of a carpool). Thus, the highway delay metric could be easily normalized by the number of workers commuting by car.”

Question: Which surface modes of transportation, other than highways, have readily available data that could be used to support a measure to assess traffic congestion? To what extent is this information available in the urbanized areas applicable to the measure proposed in this subpart?

Answer: MDOT continues to lead discussions with external entities about data and is testing multi-modal freight data through freight fluidity practices. Currently, MDOT does not have robust, reliable data for surface modes other than highways, transit, commuter and passenger rail, which is available in the urbanized area applicable to these measures. MDOT also is aware of aviation travel time data that can be processed, but this would show travel times and delay between cities.

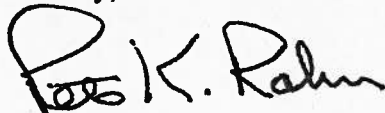
Question: What would be the appropriate surface transportation network to use to measure traffic congestion in the future? Is data available off the NHS that can be used to assess traffic congestion that can be made available to all state DOTs and MPOs?

Answer: MDOT supports AASHTO’s position on limiting the national-level measures to the NHS is good practice and that when measuring congestion, the national interest should be in congested areas and not uncongested rural areas.

MDOT appreciates the opportunity to provide these comments and looks forward to working with FHWA in the implementation of the final rule.

If you have any additional questions or concerns, please contact Ms. Nicole Katsikides, MDOT State Highway Administration Office of Planning and Capital Programming Deputy Director, at 410-545-5511 or via e-mail at nkatsikides@sha.state.md.us. Ms. Katsikides will be happy to assist you.

Sincerely,



Pete K. Rahn
Secretary

cc. Ms. Nicole Katsikides, Deputy Director, Office of Planning and Preliminary Engineering, State Highway Administration,



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
1401 EAST BROAD STREET
RICHMOND, VIRGINIA 23219 2000

Charles A. Kilpatrick, P.E.
Commissioner

August 19, 2016

U.S. Department of Transportation
Docket Operations, M-30
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue SE.
Washington, DC 20590

RE: Notice of Proposed Rulemaking; National Performance Management Measures;
Assessing Performance of the National Highway System, Freight Movement on the
Interstate System, and Congestion Mitigation and Air Quality Improvement Program;
Docket No. FHWA-2013-0054

To Whom It May Concern:

The Virginia Department of Transportation (VDOT) offers the following comments on the Federal Highway Administration's April 22, 2016 Federal Register Notice and Request for Comments: National Performance Management Measures Assessing Performance of the National Highway System, Freight Movement on the Interstate System, and Congestion Mitigation and Air Quality Improvement Program; Proposed Rule.

General Overview/Response

VDOT generally supports performance management, namely performance based planning and data-driven decision making relating to the nation's highways. Performance management should be meaningful, providing demonstrable benefits to the taxpaying public. If implemented appropriately, a performance management system helps to ensure that state Departments of Transportation are and remain responsible stewards of public funds.

The Commonwealth's support of system performance management is evidenced by various programs that utilize a performance-based management approach. For instance, VDOT currently has in place various operational transportation and highway related performance measures and targets in areas such as transportation safety, and pavement and bridge condition. In addition, the Commonwealth Transportation Board has recently adopted and VDOT has implemented a transportation project prioritization process (SMART SCALE) that bases project selection and funding on performance management principles. SMART SCALE utilizes 13 performance based measures/metrics in six categories (Safety, Congestion, Accessibility, Environmental Quality, Economic Development, and, in select urban areas, Land Use and Transportation Coordination) to rank projects for purposes of allocating funding and funding is allocated in a manner so that projects that are funded are fully funded. Under the first round of SMART SCALE, 321 project funding applications were received, 287 applications were scored and 163 projects were selected for funding and included in the Commonwealth Transportation Board's Six-Year Improvement Program for FY2017-2022.

The Commonwealth's statewide transportation plan, VTRANS 2040 utilizes a performance-based approach to transportation planning. In the VTRANS 2040 Vision, Goals & Objectives, and Guiding Principles¹, adopted by the Commonwealth Transportation Board in December 2015, each of the VTRANS five goals are supported by objectives which are similar in many respects to the performance measures proposed in this NPRM. For instance, the VTRANS Economic Competitiveness and Prosperity Goal is supported by objectives that would reduce the amount of travel that takes place in severe congestion, reduce the number and severity of freight bottlenecks, and improve reliability on key corridors for all modes. The VTRANS objectives serve as Virginia's system performance measures and the intent was to set targets for each of these.

VDOT's General Comments

- **The final rule should include performance measures that acknowledge and reflect the role that transportation plays in economic development and should not overemphasize congestion-related measures.** As noted by Virginia's Secretary of Transportation, Aubrey Layne, in a letter to Secretary Foxx, dated April 10, 2014: "The goal of the transportation system is to provide access to destinations, and a narrow focus on roadway delay could ignore the real benefits provided to the citizens of Virginia from efforts to improve access through multimodal improvements and reduced trip distances....Delay is not a valid measure of access - the goal of transportation investments. Further, the measures that will be developed will apply to a broad set of roadways - main streets, downtown streets, commercial corridors -where the goal may be lower travel speeds and slower traffic is a desirable side effect of successful community and economic development."

¹ <http://www.ctb.virginia.gov/resources/2015/dec/reso/attach/Resolution15VTRANSAttachment.pdf>

- Thus, VDOT would urge that USDOT/FHWA not create/mandate measures that imply that congestion can be eliminated in dense urban areas. VDOT would note, for instance, the interstates in northern Virginia that have essentially reached their ultimate profiles. Using congestion management/operational methodologies or strategies, such as managed lanes, is the most effective and realistic approach to addressing (managing) congestion on such roads and the more appropriate measure of performance in those cases would be one that measures how effectively congestion is being managed, as opposed to being eliminated.
- **There are too many performance measures:** The proposed rule would mandate implementation of 8 performance measures relating to systems travel time {4}, interstate freight movement {2}, and CMAQ {2}. While implementing the measures will impose a significant work burden in respect to planning, coordination, setting targets, evaluating performance, and reporting, there are more significant issues that warrant reconsideration or elimination of certain measures as proposed below:
 - As currently structured the proposed rule would require that congestion be measured three different ways on some urban interstates. Specifically, the proposed rule requires that congestion be measured on interstates in urbanized areas with a population over 1 million by (1) Annual hours of excessive delay per capita (AHED), (2) Average truck speed and (3) Peak hour travel time ratio (PHTTR). This would create redundancy and confusion for the public and other stakeholders who may not readily understand the nuances among the measures and how to reconcile disparate results such as improvements in one measure with degradation in another. As further explained below, VDOT is recommending that the Average Truck Speed and PHTTR measures be eliminated from the final rule.
 - VDOT recommends elimination of the Peak Hour Travel Time Ratio which is essentially a travel time index (TTI). As noted by FHWA in the NPRM documentation, stakeholders demonstrated little interest in travel speed indices like the travel time index and have expressed concerns that travel speed based measures alone may penalize densely developed communities that offer high levels of accessibility but not necessarily shorter travel times. Further, FHWA has acknowledged that TTIs do not capture system attributes in terms of shorter trips or better access to destinations and mode options, which may occur at the expense of greater delay, but nevertheless has included a form of TTI, the Peak Hour Travel Time Ratio. **For the reasons noted by stakeholders and acknowledged by FHWA, VDOT would recommend elimination of the PHTTR from the final rule.**
 - VDOT recommends eliminating the congestion-related performance measure/metric for freight, Average Truck Speed. As currently proposed, an interstate segment is deemed congested if average truck speed is under 50 mph. This is in conflict with another proposed congestion measure, the Annual Hours of Excessive Delay measure which uses a 35 mph speed as the threshold

for congestion on interstates and with the PHTTR which provides the flexibility to agencies to select the desired peak hour speed. In addition, VDOT's analysis of the NPMRDS freight data set revealed a number of locations in mountainous areas that consistently failed to meet this threshold due to geometric constraints. Those locations had steep uphill grades, uncongested flow, and truck climbing lanes so there are no realistic solutions to bring the speeds above 50 mph. Further, the posted speed limits are around 55 mph on urban interstates for reasons other than congestion, in contrast to the 65 or 70 mph in rural areas. Using a uniform 50 mph threshold across all segments will show most urban segments as congested. This measure would create the inappropriate/unachievable expectation that congestion can be eliminated everywhere and if included in the final rule, would likely become the measure that governs all other measures.

- **Travel Time Reliability Measures:**

- VDOT recommends that the final rule include consistent measures for travel time reliability relating to passenger vehicles and freight. Section 490.611(a)(1) specifies Truck Travel Time Reliability (TTTR) be calculated and section 490.611(b)(3) specifies that 95th percentile truck travel time be used. VDOT recommends that the calculation of freight reliability measures in proposed 23 CFR 490.611 be made consistent with the Level of Travel Time Reliability (LOTTR) measure in proposed 23 CFR 490.511. Specifically, it is recommended that 80th percentile travel time be used for both measures. VDOT believes that the 95th percentile travel time may be less affected by DOT actions than the 80th percentile travel time, so use of the 80th percentile travel time would be more meaningful for DOT performance measurement. The ability to effect change in the 80th percentile is noted by FHWA in the discussion of the measures where it is stated that the 80th percentile was chosen for LOTTR because it reflects the travel time where operational strategies can make the most impact on improving reliability. VDOT does not believe there is a valid basis for applying a different metric for purposes of measuring travel time reliability for freight vs passenger vehicles.
- VDOT would also recommend that each of the travel time reliability measures be weighted for the applicable vehicle volumes, to give greater weight to high impact areas/segments that carry the most traffic.

- **Delay (Congestion Measure):**

- The performance measure to assess traffic congestion for the purpose of carrying out the CMAQ program is Annual hours of Excessive Delay (AHED) Per

Capita. This measure falls short in consideration of alternate modes, such as buses, and travel demand management, as it does not give weight to vehicle occupancy. VDOT suggests instead that Person Hours of Excessive Delay be reported as this would provide an incentive to improve corridors that have higher vehicle occupancy rates. VDOT would note that the Federal Transit Administration's National Transit Database would serve as a source of data regarding transit vehicle/bus occupancy. Default values for vehicle occupancy could be used where more specific data was not available.

- AHED defines excessive delay as the extra amount of time spent in congested conditions when speeds fall below 35 mph on Interstates and other freeways and below 15 mph on all arterials. Since the function of arterials varies considerably it is not appropriate to measure all by the same threshold. Many arterials are not expected to operate over 15 mph; they provide access through dense commercial areas and a low operating speed is unavoidable. The lower operating speed is compatible with other users of the corridor such as pedestrians and cyclists and in providing access to key businesses. As such, VDOT recommends that this measure not be reported on arterials with speed limits below 45 mph within urbanized areas.
- **Air Quality (On-Road Mobile Source Emissions/Emissions Reduction Measure):**
 - Section 490.803 as proposed by the NPRM provides that the performance measure for assessing on-road mobile source emissions for the CMAQ Program does not apply to State DOTs and MPOs that do not contain any portions of nonattainment and maintenance areas. VDOT agrees with this provision, as no new burdens should be imposed on areas that are currently in attainment with all of the National Ambient Air Quality Standards (NAAQS). In addition, since CMAQ projects generally represent a small subset of transportation projects in nonattainment or maintenance areas and therefore have a limited impact on improving regional air quality, VDOT recommends that FHWA instead consider a region-wide air quality measure, such as compliance with EPA's transportation conformity regulations that already apply in nonattainment and maintenance areas. This would help to streamline compliance with the new performance measure requirements while helping to ensure that transportation planning remains consistent with region-wide air quality goals.
- **Data:** VDOT recommends greater flexibility in using data other than the NPMRDS, that improvements be made to future versions of the NPMRDS, and that clarifications be made as described below.
 - There currently may be other data sets that are of higher quality, more complete, and contain more consistent mapping information than the NPMRDS. Some examples of specific problems VDOT has noted when dealing with the NPMRDS over the last several years include the following:

- Inconsistencies in Route nomenclature. For example, a portion of I-64 is labeled US-60. This mistake leads to wrong functional classification.
- Reversible lanes on I-95 (Express Lanes) have NPMRDS data for all time periods and both directions. However, only one direction is valid for travel at specified intervals. Freight data is also available for some sections of the state network that restricts trucks.
- The network is not up to date; it does not currently include the extension of the I-95 express lanes which were completed and open to traffic in December 2014.
- Data availability is very low in NPMRDS in some situations:
 - * Night time: The White Paper on NPMRDS Missing Data and Outlier Assignment² available on the FHWA docket and attached hereto confirms this; Figure one shows that data availability is much higher during the day and ranges from only 3 to 45% between the hours of 10 pm and 5 am when broken out by system and classification.
 - * Non-Interstate NHS: Again, the white paper confirms this; Figure 1 shows a maximum average data availability on non-Interstate NHS during day times as less than 35% for all vehicles, for any given hour. These observations are in line with VDOT's detailed research findings on more than 300 select TMCs in Virginia.
 - * Individual TMCs: NPMRDS data availability also spans the entire spectrum from some TMCs having near complete datasets for the year during daytime (6 am to 8 pm) to some TMCs having just one 5-minute data point for the entire year.

For these reasons, VDOT recommends more flexibility to use other data sets and that steps be taken and processes implemented to address data quality issues in NPMRDS. In addition, VDOT has the following comments and need for clarifications regarding the NPMRDS:

- NPMRDS (and all other probe data sets that we are familiar with) do not differentiate between hard shoulder and regular lanes, as well as turning movements on arterials. However, the NPRM/proposed rule would require that such facilities not be included in assessments of performance. Given the lack of differentiation between these facilities in the data, it is not clear how exclusion can be accomplished.
- NPMRDS shapefiles and data also contain many ramps, and the NPRM explicitly mentions that the performance measures pertain only to the mainline highways and do not include ramps. Further, ramps will inherently exhibit low traffic speeds. VDOT requests that (1) NPMRDS be cleaned of ramp data, (2) NPMRDS should contain data for only NHS, or include a field in the static file that designates a TMC as belonging to an NHS or not; and (3) the final rule not include measuring performance

² <http://www.regulations.gov/contentStreamer?documentId=FHWA-2013-0054-0103&attachmentNumber=1&disposition=attachment&contentType=pdf>

on ramps. This is particularly problematic for any performance measures that use a fixed speed threshold.

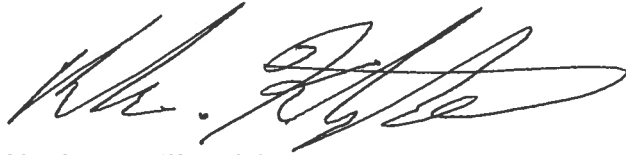
- Data quality concerns are high with NPMRDS (both availability and variance across days). Quality screening is applied only for PHTTR measures but not for other measures. Based on our experience and examples of data being provided where it should not be, VDOT recommends more detailed screening tests be implemented. Specifically, VDOT recommends FHWA specify (1) detailed data quality screening tests, and (2) minimum data availability standards to monitor performance at a TMC.
- With the lack of data availability relating to night time periods, VDOT recommends not calculating performance measures for night time periods using the NPMRDS.
- VDOT believes that there are other sources/data bases containing more accurate data relating to non-Interstate NHS facilities than the NPMRDS and recommends that states be permitted to use those sources for calculating performance measures for the non-Interstate NHS facilities.

Finally, VDOT requests that FHWA specify the process for a state to obtain approval of an equivalent data set to include all information that would need to be submitted and the response time. For example, in 490.103(e)(5)(ii)(B), the proposed rule requires that the equivalent data set shall include “Average travel times for at least the same number of 5 minute intervals and the same locations that would be available in the NPMRDS”. It is not clear how this determination will be made nor is it clear whose responsibility it will be to make this determination. VDOT recommends that FHWA provide an opportunity for data providers to have their products pre-approved for any states to use.

- **Resources:** VDOT strongly supports FHWA's proposal to "dedicate resources at the national level to provide on-site assistance, technical tools and guidance to State DOTs and MPOs ..." to help defray the significant cost and resources needed to implement these performance measures.
 - VDOT is very concerned about the additional costs that may be incurred in implementing these measures such as the costs associated with needed software and processing tools to deal with the extremely large data sets involved, hiring additional employees or contracting with consultants having appropriate skill sets, and the resources needed to conflate and keep conflation current as networks change. VDOT requests that FHWA identify and commit to providing technical and automated support systems and tools to help implement the measures.

In closing, VDOT appreciates the opportunity to provide comments on this proposed rule. If you have any questions, do not hesitate to contact Mena Lockwood, P.E., at (804) 786-7779, Ben Mannell, AICP, at (804) 786-2971, or for Air Quality matters, James Ponticello at (804) 371-6769.

Sincerely,

A handwritten signature in black ink, appearing to read "Ch. Kilpatrick", with a large, sweeping flourish at the end.

Charles A. Kilpatrick, P.E.
Commissioner of Highways
Virginia Department of Transportation



National Capital Region
Transportation Planning Board

August 26, 2016

The Honorable Gregory G. Nadeau
Administrator
Federal Highway Administration (FHWA)
U.S. Department of Transportation (USDOT)
1200 New Jersey Avenue SE
Washington, DC 20590

Carolyn Flowers
Acting Administrator
Federal Transit Administration (FTA)
U.S. Department of Transportation (USDOT)
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Comments on Proposed Metropolitan Planning Organization Coordination and Planning Area Reform Rule [Docket No. FHWA-2016-0016]

Dear Administrator Nadeau and Acting Administrator Flowers:

I write to you on behalf of the National Capital Region Transportation Planning Board (TPB) to offer our comments on the recent Notice of Proposed Rulemaking (NPRM) on “Metropolitan Planning Organization Coordination and Planning Area Reform.” The TPB is the metropolitan planning organization (MPO) for the Washington metropolitan area.

While the TPB strongly supports the stated intent of the NPRM, we have significant concerns about the practicality of the proposed changes and the negative consequences those changes would have on metropolitan transportation planning and decisionmaking. We respectfully request that you withdraw the NPRM and work with individual MPOs and States to remedy specific instances in which a lack of coordination might be hindering the metropolitan transportation planning process.

Below are our chief concerns and the reasons why we urge that this NPRM be withdrawn:

- **Replacing the existing consultative process of defining Metropolitan Planning Area (MPA) boundaries with a “one-size-fits-all” approach would ignore local needs and processes.**

The NPRM proposes that Metropolitan Planning Areas (MPAs) encompass entire Urbanized Areas as defined by the U.S. Census Bureau, plus the contiguous area expected to become urbanized within the next 20 years. This one-size-fits-all approach would replace the existing process for defining boundaries in which States and MPOs engage in a consultative, cooperative process that take into account a variety of important factors, including population densities, local transportation needs, transportation and land-use interactions, and existing legislative and administrative processes.

These long-standing approaches have, in our view, enabled a more effective and productive planning process that more fully satisfies the statutory “3-C” requirement—for a continuing, comprehensive, and cooperative transportation planning process.

A number of other practical concerns about this one-size-fits-all approach impel us to call for the withdrawal of this NPRM:

- The U.S. Census Bureau’s process for defining Urbanized Area boundaries is not well understood and does not appear to consider transportation systems or mobility needs.
- Urbanized Area boundaries do not align with the boundaries of local government jurisdictions, which bear the greatest responsibility for early planning and programming of transportation projects.
- The boundaries of Census tracts, the basic unit of land area used by the Census Bureau to identify Urbanized Areas, do not align with the boundaries of Transportation Analysis Zones (TAZs), the basic unit of land area used by MPOs to define the boundaries of the MPA and to conduct transportation analyses.
- No recognized agency or entity currently exists to forecast future population and population densities to determine the future extent or congruity of Urbanized Areas. With no such system or process in place, reaching agreement on the boundaries of an MPA would be challenging and would add unnecessary complexity to the planning process.
- Conducting air quality conformity analysis for MPAs that span multiple existing metropolitan areas that are in various stages of meeting federal air quality standards would be extremely difficult. (See next section for more.)

***TPB Recommendation:** States and MPOs should retain the full authority and flexibility to define MPA and MPO boundaries in a manner that considers the transportation needs and administrative and decisionmaking processes within the Metropolitan Planning Area.*

- **Conducting metropolitan planning over more expansive areas would lead to less efficient and less effective planning and decisionmaking.**

The NPRM’s proposal that MPAs encompass entire Urbanized Areas and any contiguous areas expected to become urbanized within the next 20 years would lead to the creation of extremely large MPAs. The NPRM does provide for an exemption in which excessively large MPAs could have multiple MPOs, but it would still require those MPOs to jointly develop a single metropolitan transportation plan (Plan) and Transportation Improvement Program (TIP), to agree to a process for making a single air quality conformity determination, and to jointly establish performance targets to address new federal Performance-Based Planning and Programming requirements.

The TPB considers this to be the most onerous and impracticable change to the metropolitan planning process. Even under the current process of defining MPO boundaries and MPAs, many MPOs cover vast areas encompassing dozens of counties and cities, multiple states, and other regional entities and authorities. The TPB’s planning area already spans three state-level jurisdictions, encompasses 21 counties and cities, covers 3,500 square miles,

and is home to more than 5 million people. Under the proposed rule, that area would grow to cover 11,200 square miles, spanning six state-level jurisdictions from Virginia to New Jersey, with a population of more than 15 million people (see Figure 1 on p. 5). The mobility needs, local transportation and land use planning policies and priorities, and the availability and appropriateness of different travel modes would vary immensely across a region of this size.

Thus, the NPRM would make an already challenging task totally impracticable in the following ways:

- The vast diversity of needs and dispersed planning and decisionmaking processes would make it nearly impossible to develop a coherent and unifying set of priorities, goals, and objectives to guide the development of a Plan.
- Differences in the budgetary cycles and funding obligation procedures among different jurisdictions would make the process of developing and amending a joint TIP onerous and time-consuming and could delay or stop critical investments in transportation infrastructure improvements.
- The expansiveness of the planning area and the diversity of needs and people it encompasses would make it challenging to gather public input and to use it in a meaningful way when developing the Plan, TIP, and other products.
- Conducting air quality conformity analysis for such a large area with multiple MPOs, each of which may be in different levels of non-attainment or maintenance status for different criteria pollutants with different target years for analysis and different levels of motor vehicle emissions budgets, would be overwhelming and impracticable.

***TPB Recommendation:** MPOs should continue to develop a Plan and TIP and make air quality conformity determinations for their respective planning areas as they currently exist.*

- **Coordination between adjacent or affected MPOs is already occurring. Existing planning rules and practices do not preclude further efforts to strengthen such coordination.**

The NPRM suggests that having multiple MPOs in a given MPA is inefficient and that better coordination among those MPOs and with adjacent MPOs is needed.

The TPB believes that the MPO boundaries and MPAs in the National Capital Region and its vicinity that have existed over the past several decades have served the larger Urbanized Area and the States well. The TPB is not aware of any documented examples of existing boundary-setting practices that have systematically hindered metropolitan planning.

The TPB has coordinated effectively with adjacent MPOs on many occasions and at different levels. Here are a few examples:

- **Planning analyses coordination:** The TPB works closely with the Baltimore MPO (BRTB) on a number of planning activities, including collecting household travel data, developing land use assumptions for use in travel demand forecasting, and implementing transportation demand management programs.

Mr. Nadeau and Ms. Flowers
August 26, 2016

- **Project-level coordination:** The TPB coordinated with the Fredericksburg Area MPO (FAMPO) in updating the Plan to include a multimodal Express Lanes project on I-95 that crossed the boundaries of both MPOs.
- **Cooperative agreement:** The TPB entered a cooperative agreement with FAMPO in 2004 to fulfill metropolitan planning responsibilities for a portion of Stafford County, Virginia, that was designated in the 2000 Census as contiguous to one of the Urbanized Areas within the TPB's planning area.
- **Coordination across multiple MPOs:** The TPB meets regularly with the MPOs in Baltimore (BRTB), Wilmington (WILMAPCO), and Philadelphia (DVRPC) as part of the Mid-Atlantic Regional Planning Roundtable. The coordination effort has been cited as a best practice in the Federal Highway Administration's "Regional Models of Cooperation Case Studies."

We are confident that any inefficiencies in the current metropolitan planning practices perceived by USDOT can be addressed within existing planning rules or with a few additional targeted requirements developed in consultation with the MPOs and States. We believe that a study jointly undertaken by USDOT, the States, and MPOs to identify the issues to be resolved and examine the best way to address them in a context-sensitive manner would be most informative.

***TPB Recommendation:** USDOT should undertake a joint study with MPOs and the States to identify specific issues to be resolved and examine the best way to address these in a context-sensitive manner without drastic changes to existing processes and procedures.*

We thank you for the opportunity to provide these comments on the proposed "Metropolitan Planning Organization Coordination and Planning Area Reform" rule. Again, we respectfully request that you withdraw the NPRM and work with individual MPOs and States to remedy specific instances in which a lack of coordination might be hindering the metropolitan transportation planning process. The concerns raised here about the practicality of the proposed rule and its negative consequences on metropolitan transportation planning process make this a particularly important request.

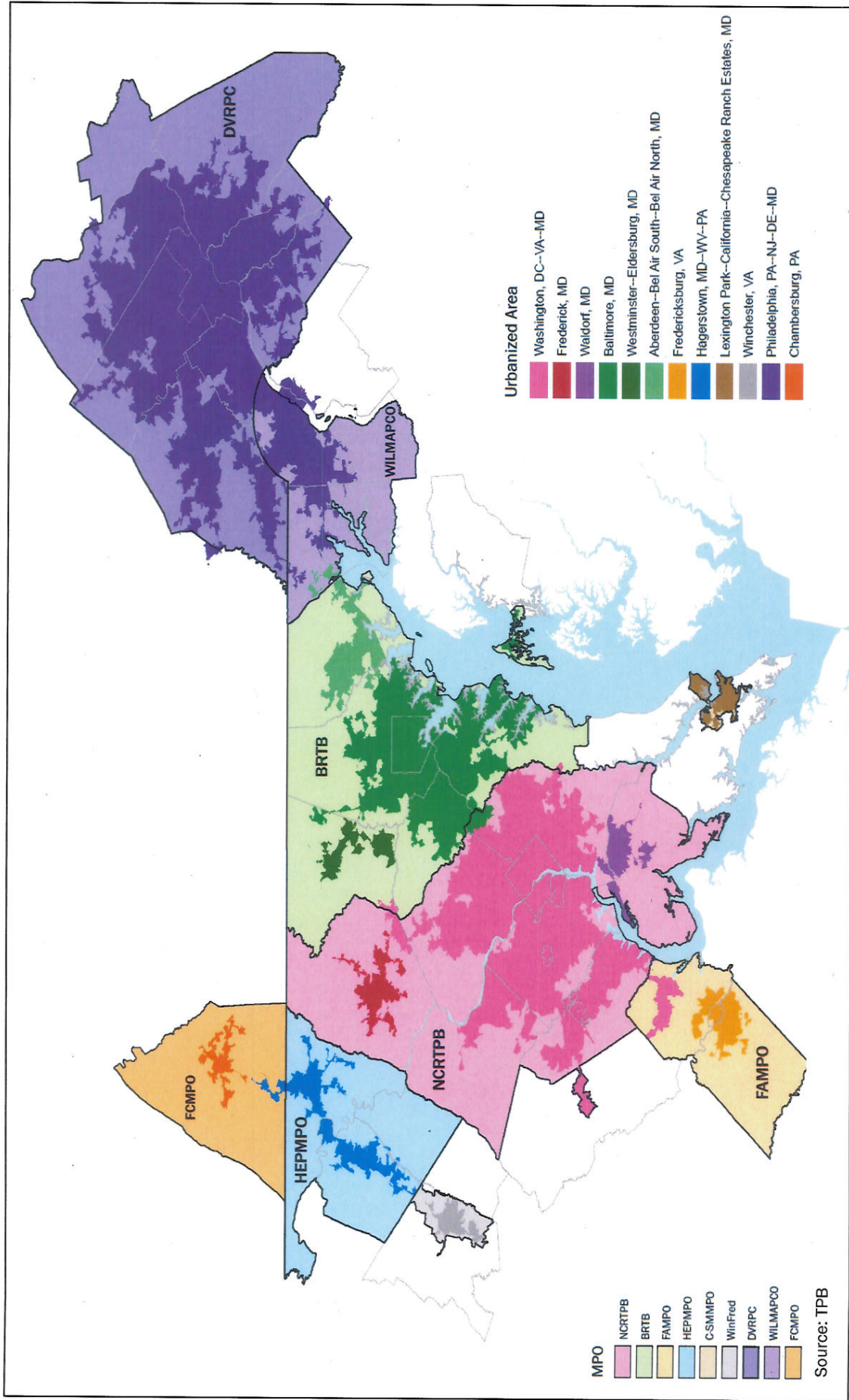
If you have any questions or would like to discuss this matter further, please contact TPB Staff Director Kanti Srikanth at ksrikanth@mwco.org or (202) 962-3257.

Sincerely,



Tim Lovain
TPB Chairman

FIGURE 1. National Capital Region - MPO and Urbanized Area Boundaries, 2010 Census (smoothed)





MEMORANDUM

TO: Transportation Planning Board
FROM: Kanti Srikanth, TPB Staff Director
SUBJECT: Announcements and Updates
DATE: September 15, 2016

The attached documents provide updates on activities that are not included as separate items on the TPB agenda.



MEMORANDUM

TO: Transportation Planning Board
FROM: Eric Randall, TPB Transportation Engineer
SUBJECT: Updating the Board on follow up actions related to the January 12, 2015 Metrorail L'Enfant Plaza smoke incident and Metro Safety.
DATE: September 15, 2016

SUMMARY

This memorandum provides an update on activities taken subsequent to the January 12, 2015 Metrorail L'Enfant Plaza smoke incident.

BACKGROUND

Since its January 21, 2015 meeting, the Transportation Planning Board (TPB) has engaged in monitoring safety developments related to the fatal incident on the Yellow line of Metrorail at the L'Enfant Plaza station on January 12, 2015.

RECENT EVENTS AND ACTIVITIES

EAST FALLS CHURCH DERAILMENT

On July 29, two cars of a six-car Silver Line train derailed east of the East Falls Church Metrorail station at a switch between the two main tracks. The location of the derailment was outside the SafeTrack work zone and the preliminary cause was that the rails were too wide (i.e., board gauge) due to deteriorated rail ties. One passenger was transported for medical treatment of a non-life-threatening head injury. The Rail Operations Control Center (ROCC) Fire Liaison played a key role in coordinating the deployment of fire department and other emergency response personnel during the incident response.

FEDERAL SAFETY OVERSIGHT

In August 2016, the FTA issued three safety directives to WMATA.

- Safety Directive 16-4 directs the agency to address findings in track inspection, manuals, quality oversight, and track construction and maintenance.
- Safety Directive 16-5 directs the agency to take eleven actions to reduce stop signal overruns.
- Safety Directive 16-6 directs the agency to address findings related to redundant securement for rail vehicle storage, rules and procedures, and employee training.

The FTA's website for WMATA safety directives and actions is located here:

<https://www.transit.dot.gov/regulations-and-guidance/safety/wmata-safety-directives-and-reports>

METRO SAFETY COMMISSION

Mayor Bowser formally submitted the Metro Safety Commission (MSC) legislation to the D.C. Council with the goal of getting a vote this year. Identical legislation will be introduced at the General Assembly sessions in Maryland and Virginia in January 2017. US Transportation Secretary Foxx wrote in a letter that he is encouraged at the progress, but is keeping a February 9, 2017 deadline for the “three jurisdictions to create a fully functioning and effective State Safety Oversight Agency (SSOA).”

Representatives from the three jurisdictions are concurrently working on designing the MSC organization, including options for staffing, funding, governance, and location. COG continues to assist as the recipient of FTA State Safety Oversight (SSO) funds, approximately \$1.6 million annually. In August, FTA notified the jurisdictions and COG that \$900 thousand of the federal FY16 SSO funds would be directed to hiring contractors to provide initial staffing and expertise for the MSC. COG was recently awarded the SSO grant funds for FY14: \$2,062,035 in federal and state/local matching funds.

METRO SAFETY SURGES

On May 19, WMATA issued a SafeTrack plan of 15 surges: shutdowns or significant single-tracking periods on focused line segments, for one to six weeks at a time over the course of a year (June 2016 through March 2017).

On August 16, during Surge #7, WMATA announced several adjustments to the SafeTrack surge schedule for Surges #7, #8, and #9 to allow for the completion of additional work on crossover tracks and address new safety recommendations. On September 14, a new schedule was announced for Surges #10 and #11, with a schedule for Surges #12 – 15 to be published in December.

TPB also conducted a traffic analysis of the first four SafeTrack Safety Surges and here are the [memo](#) and [TPB News Article](#).

METRO ROCC FIRE LIAISON

As of June 1, 2016 the ROCC Fire Liaison position has been staffed 24/7. Funding and personnel for the position have been secured, with backup personnel on call in order to eliminate potential gaps in service.

METRO COMMUNICATIONS AND MONITORING SYSTEMS

As of September 2, 2016, WMATA crews have installed 2% of new cables for the Public Safety Radio System (PSRS) replacement project. In addition, tens of thousands of feet of the cable management system have been installed in preparation for the ongoing cable replacement.

WMATA, in collaboration with COG’s Metro Interoperable Communications Working Group, Verizon, and the Cellular Carrier team, have explored improvements to 9-1-1 service in underground tunnel environments. The group also examined the feasibility of obtaining location data from 9-1-1 calls and the possible implementation of “Next Generation 9-1-1” technology underground.

In cooperation with the COG Metro Interoperable Communications Working Group, WMATA has enhanced methods for mapping radio outage data via an online, secure display map. Updated maps are used on a daily basis by the ROCC Fire Liaison and other personnel.

Committee Member FAQ for COG Website

1. How do I find information for my committee?

Find information about your committee on your committee page. There are multiple ways to navigate to your committee page on the COG website. However, the most direct way to access your committee is by visiting: www.mwcog.org/committees and searching for your committee by name or scrolling down the list until you see your committee.

Once you are on your committee page, you can view meeting dates, meeting materials, members, featured documents, and staff contacts.

2. Where is meeting information located?

You can access upcoming meetings and materials for your specific committee on the lower right side of your committee page. To view meeting materials, such as such as agendas and presentations, click on the name of the meeting. To view more meetings, click 'View All' on the top right side.

COG Board of Directors

The Board of Directors is the Council of Governments' governing body and is responsible for its overall policies and the approval of its work program and budget. The board takes action on committee recommendations, discusses current and emerging regional problems, and develops legislative priorities and policy focuses. In recent years, the board has focused on regional infrastructure, economic competitiveness, and the Metrorail system.

Board members are appointed each year by COG's local governments and representatives from the Maryland and Virginia state legislative delegations. The current board consists of 34 members—the majority are elected officials.

Board meetings are held at noon on the second Wednesday of most months. Meetings are open to the public, and representatives from the media frequently attend.

Featured Documents [VIEW DOCUMENTS](#)

PUBLICATIONS
COG Annual Report/Regional Directory
Mar 16, 2016
COG's combined Regional Directory and Annual Report lists the phone numbers and email addresses of area government officials and highlights the year's major initiatives and events.

PUBLICATIONS
COG Board Member Handbook
Feb 11, 2016
The COG Board Handbook includes key documents about COG and its governance, including an organizational chart, COG Board roster, committee leadership listing, media protocol, audio visual etiquette, and more.

PUBLICATIONS
COG Legislative Priorities
Jan 14, 2016
The legislative priorities approved by the COG Board of Directors for 2016 focus on investing in the safety of the Metro system, encouraging innovation, and supporting the region's infrastructure and workforce.

Committee Members [VIEW ALL](#)

Roger Berliner, Chairperson
Kenyan McDuffie, Vice Chairperson
Matt Letourneau, Vice Chairperson

Staff [VIEW ALL](#)

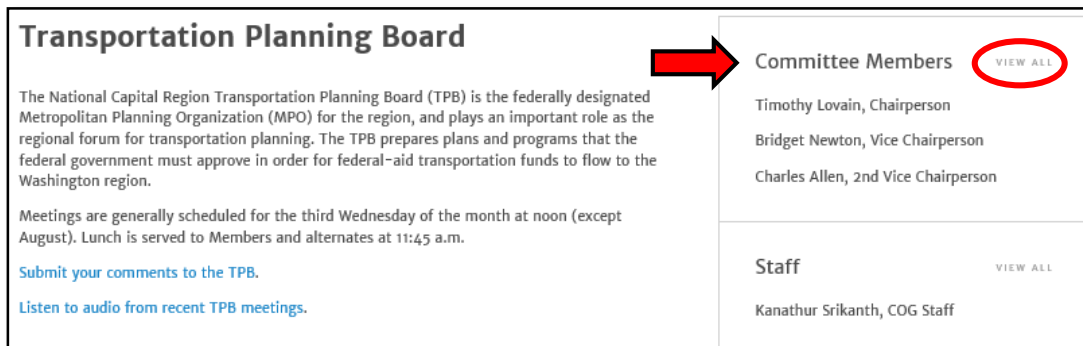
Monica Beyrouti, COG Staff
Laura Ambrosio, COG Staff

Events & Event Materials [VIEW ALL](#)

- 14 SEP** COG Board of Directors Meeting
TIME: 12:00 PM - 2:00 PM
- 12 OCT** COG Board of Directors Meeting
TIME: 12:00 PM - 2:00 PM
- 9 NOV** COG Board of Directors Meeting
TIME: 12:00 PM - 2:00 PM
- 14 DEC** COG Board of Directors Annual Meeting
TIME: 12:00 AM - 12:00 AM

3. Where is the list of committee members?

Along with meeting dates and materials, the list of committee members can be found on your committee page. Click on 'View All' at the top right side of the committee page.



4. How do I use my member login?

As a member of one of COG's committees, you now have access to a personal login. Once you log in, you can quickly view your committees, committee documents, and committee rosters. You can also manage your contact information, event and meeting RSVPs, and subscriptions all in one place. RSVP for meetings or events that offer online registration by logging into your COG account.

You should have previously received an email with your username and password to login. Click 'Login' on the upper right. If you forget your password, click on 'Forgot Password?' link.



5. What if I have more questions?

If you have any other questions regarding your committee, please reach out to the COG staff contact for your committee. If you have any other general website feedback, please contact webmaster@mwcog.org.