

ITEM 8 – Action

July 18, 2012

Review of Comments Received and Acceptance of Recommended Responses for Inclusion in the Air Quality Conformity Assessment for the 2012 Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 TIP, the 2012 CLRP, and the FY 2013-2018 TIP

Staff Recommendation: Receive briefing on comments received and accept recommended responses for inclusion in the air quality conformity assessment for the 2012 CLRP and FY 2013-2018 TIP.

Issues: None

Background: These draft documents and web-based information were released for public comment on June 14, and the public comment period for these documents ended on July 14. Public comments are posted as received on the TPB web site. The final version of the comments and responses memorandum will be incorporated into the documents scheduled for consideration under agenda items 9, 10 and 11.

National Capital Region Transportation Planning Board

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Item 8

MEMORANDUM

July 18, 2012

TO: Transportation Planning Board

FROM: Ronald F. Kirby
Director of Transportation Planning

SUBJECT: Review of Comments Received and Recommended Responses for Inclusion in the Air Quality Conformity Assessment for the 2012 Financially Constrained Long-Range Transportation Plan (CLRP) and the FY 2013-2018 TIP, the 2012 CLRP, and the FY 2013-2018 TIP

Background

At the June 20 meeting, the Board was briefed on the air quality conformity assessment for the 2012 CLRP and FY 2013-2018 TIP, the draft 2012 CLRP, and FY 2013-2018 TIP. These draft documents and web-based information were released for public comment on June 14. The public comment period closed on July 14.

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

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

This memorandum provides recommended responses to comments received.

The Board will be briefed on comments received and asked to accept recommended responses for inclusion in the air quality conformity assessment for the 2012 CLRP and FY 2013-2018 TIP, the 2012 CLRP, and FY 2013-2018 TIP. The final version of the comments and responses memorandum will be incorporated into the documents scheduled for consideration under agenda items 9, 10 and 11.

Comments and Responses

The comments received and recommended responses are summarized below:

A. Support the Washington DC Ward 7 Projects in the FY 2013-2018 TIP

Comment: Twelve comments were received urging the TPB to approve the Ward 7 projects in the TIP because they are important to improving accessibility, mobility, and the quality of life in the neighborhood.

Response: The FY 2013-2018 TIP is expected to be approved with these projects included. The comments on the projects have been forwarded to representatives from the District of Columbia Department of Transportation.

B. Support the Inclusion of the westbound I-66 Spot Improvement #2 in the FY 2013-2018 TIP

Comment: One hundred and fifty-seven comments were received urging the TPB to include Phase 2 of the westbound I-66 Inside the Beltway Spot Improvements in the FY 2013-2018 TIP.

Response: This project is included in the draft TIP (page V-3, TIP ID 4303) with \$18.6 million in construction funding shown in FY 2013 and \$14.7 million in previously programmed funding.

C. The FY 2013-2018 TIP and 2012 CLRP are Deficient as Transportation Plans when Measured Against the Reality of the Region's Land Uses

Comment: The Washington Airports Task Force in the enclosed letter argues that the philosophy behind the region's transportation planning does not match the existing and projected land uses and does not resolve congestion on the highway network. While the TIP and CLRP may help the region comply with federal requirements, it is argued that they are deficient as transportation plans. The letter also supports the inclusion of several highway projects to improve person and freight access to the Washington Dulles Airport.

Response: As required by federal planning regulations, the CLRP is financially constrained, which means that the highway and transit capacity expansion projects and improvements in the plan have been limited. For many years, the TPB and the states have acknowledged the need for significant increases in transportation funding in order to address the highway and transit congestion challenges in the region. Recognizing the limits of the CLRP, the TPB is developing a Regional Transportation Priorities Plan (RTPP) that is not financially constrained and will identify near-term, on-going and long-term regional strategies that offer the greatest potential contributions toward addressing regional challenges such as congestion and access to the region's airports.

Long-term strategies for accommodating the projected growth in the region that integrate land use and multi-modal transportation scenarios will be presented to the public during the next phase of the public outreach for the RTPP in the fall of 2012. One such scenario, the CLRP Aspirations Scenario, presented to the TPB in October 2011, includes a 1,650-mile regional variable priced-lane highway network and a 500-mile regional bus rapid transit system integrated with a combination of supportive land-use changes. Participants in the fall 2012 public outreach will be invited to suggest additional scenarios, including potential funding mechanisms. This will provide an opportunity for the Washington Airports Task Force and other advocacy groups to propose long-term strategies with specific land use

policies and highway and transit capacity improvements, together with proposed mechanisms for funding the transportation improvements.

D. The Funding for the I-270 Corridor Highway Expansion in Maryland Should be Used for Transit Improvements

Comments: The Action Committee for Transit in the enclosed letter objects to spending more than \$3 billion on widening I-270 because doing so would induce demand and fail to reduce congestion; the funds would be better used to implement transit improvements in the I-270 corridor; and it would preclude the possible extension of Metro's Red Line to Germantown.

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

The transit only alternatives considered during this stage of the study included heavy rail north of Shady Grove, as well as light rail and bus rapid transit options. The study results have shown that no single transportation strategy alone will meet the projected travel demand in the corridor. It is a federal requirement under the National Environmental Policy Act (NEPA) that major capital projects be included in the region's CLRP before completing the NEPA process. For the CLRP a project placeholder for an I-270 improvement has been specified since 2003 with an assumed completion date of 2030. The project team then developed several "combination alternatives" that included transit investment (the Corridor Cities Transitway as either light rail or bus rapid transit) and highway investment (general purpose, HOV, or a combination of these on I-270 and US 15).

The Maryland Department of Transportation (MDOT) is currently focusing on building the transit component first and is in the process of separating the transit and highway components of the Multi-Modal Study, so that CCT can move forward independently of the highway alternatives. Until this happens, federal requirements dictate that the entire project must remain in the CLRP or the transit project cannot move forward. Due to the economic downturn, project planning of the highway improvement portion of the study has been placed on hold. Since the June 2009 Public Hearings, the Maryland Transit Administration (MTA) completed additional alignment studies and held a public hearing in December 2010.

Comment: The MTA's MARC Growth and Investment Plan is not currently funded in the CLRP.

Response: MDOT has included \$679 million in the CLRP for MARC projects from the MARC Growth and Investment Plan and has entered them into the TPB database. However, projects included in the CLRP project lists are new facilities or new services, not improvements to existing service. Improvements to MARC service as well as

improvements to Metro and other commuter rail services are accounted for in the financial analysis for the CLRP, and in the travel demand modeling process that the TPB uses to make its air quality conformity determination, but are not included in the CLRP major improvements maps or listings.

E. Proposed Alternatives to the Manassas National Battlefield Park Bypass

Comment: An individual recommends the removal of the Battlefield Bypass from the CLRP with the funding allocated to the Bi-County Parkway, I-66/Route 28 Interchange and Express Bus Service. Charging a \$5 entrance fee to the park to reduce congestion in the park is also recommended.

Response: The Manassas National Battlefield Park Amendments of 1988, required an environmental study for the bypass, including the closure of Route 29 and Route 234. It also mandated Congress to provide part of the funds for the construction of the project. Under this law, the federal funds identified for the project cannot be allocated to other highway or bus improvements. Charging an entrance fee, unlike the closure of Route 29 and Route 234, would not remove traffic through the park.

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Washington Airports Task Force

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Comment on MWCOG's New CLRP

July 14, 2012

The Honorable Todd Turner, Chairman
National Capital Region Transportation Planning Board
777 North Capitol Street, NE, Suite 300
Washington, D.C. 20002-4239

Dear Chairman Turner:

The Washington Airports Task Force (WATF) appreciates this opportunity to comment on the revised draft 2012 CLRP, draft FY 13-18 TIP, and the Air Quality Conformity Analysis.

When the philosophy behind the region's transportation planning is measured against the reality of the land uses, the TIP and CLRP are shown to be deficient in their ability to meet the region's surface transportation requirements. They may be perfectly adequate to help the region comply with federal requirements, but they are deficient as transportation plans.

WATF strongly recommends that this fundamental deficiency be addressed in the preparation of the next CLRP.

This statement should not be considered as a negative comment upon the capabilities of the TPB staff, which this Task Force holds in high regard from our working relationship with them over the last three decades. The deficiency lies in the political philosophy and process that constrains the TPB staff in their ability to offer transportation solutions to fully match the region's existing and projected land uses.

The region's philosophy is to focus growth on mixed use activity centers and to link these centers with multi-modal surface transportation. The ability of the

region to achieve this land use philosophy in our free society obviously will be based on human choice, i.e. market forces. Currently there would appear to be a strong demand for mixed use urban style communities. However while much growth should be accommodated in activity centers the transportation needs of the existing population still needs to be served.

The problem comes in the surface transportation to link the activity centers to each other and to the rest of the region. The CLRP places a heavy emphasis on transit to link the activity centers. Due to the high cost of expanding the region's rail transit network, 90% of future transit likely will be road based, and that means dedicated traffic lanes if the transit is to provide a practical alternative to the automobile for people living and working in the activity centers. *History does not suggest that the region's elected officials will be willing to close existing highway lanes in order to restrict their use to transit vehicles, nor does the CLRP seem to include the construction of sufficient new highway capacity to accommodate the dedicated transit requirement.*

Further, the vast majority of the region's population will not reside in activity centers, and are not likely to have attractive transit options to the automobile. Both these factors underline the importance of resolving congestion on our highway network. Put simply, *if the congestion is not resolved, the proposed transit solutions will not work.*

The level of access to the region's rail transit is provided by an analysis published in March by the Northern Virginia Regional Commission (NVRC). The study only covers the Northern Virginia portions of our region, but it shows that today 4.5% of residents live within walking distance (typically half a mile) of a rail transit stop, and by 2040, the figure will only have risen to 7.5%, even with growth focused in mixed use activity centers. While this Task Force would expect the District of Columbia to have a much higher percentage of residents and employees able to use rail transit, the Northern Virginia figures may not be dissimilar to those that would be found from an analysis of suburban Maryland.

The NVRC analysis also shows that today 18% of residents (including the Silver line now under construction) live within a full mile of rail stops a figure expected to expand to 24% in 2040. This underlines the importance of providing practical mechanical links to rail stops which are user friendly under all weather conditions in order to bring a much higher percentage of the population within usable distance of the region's rail transit system. *The CLRP does not seem to address this need.*

Not all projected regional growth is focused on mixed use activity centers. Some localities in the MWCOG region still plan to generate more jobs than housing, thus extending commuting distances. As a result, the 2030 Group estimates that the region's inward commuting will expand from 350,000 vehicles a day today to 750,000 a day in 2030. *The CLRP does not seem to address this reality either.*

In June the TPB reported that regional access to our regions three scheduled service airports has deteriorated under the implementation of past TIPs and CLRPs. This is a matter for serious concern. Airport access effects where many employers chose to locate. If activity centers lack swift and reliable access to air service they will not reach their planed potential. *Many required airport access improvements are not included in the TIP/CLRP.* Detailed comments on airport access needs were made to TPB last year.

Four specific deficiencies with respect to Washington Dulles are noted below:

1. Missing from the CLRP is the proposed bridge across the Dulles Corridor just east of Route 28 – the Horsepen Bridge which would link the Dulles Corner and future CIT/Dulles World Center employment areas. Long term, without this bridge, people seeking to move between the Dulles Corner and the CIT area will be forced to take a seven mile drive via Route 28 to cross the Dulles Corridor. The impact of this additional traffic on Route 28 will cause that road, even in its developed form, to fail at the entrance to Washington Dulles International Airport. The CIT/Dulles Corner area is a growing major mixed use activity center served by a proposed Silver Line station, but divided by the Corridor. Movement between the two halves of this activity center will be large.

As the economy of the region is dependent upon the services provided at its three airports, and as the Transportation Planning Board has recently assessed the degradation in airport access, the burden placed on Route 28 if the Horsepen Bridge is not constructed will be serious.

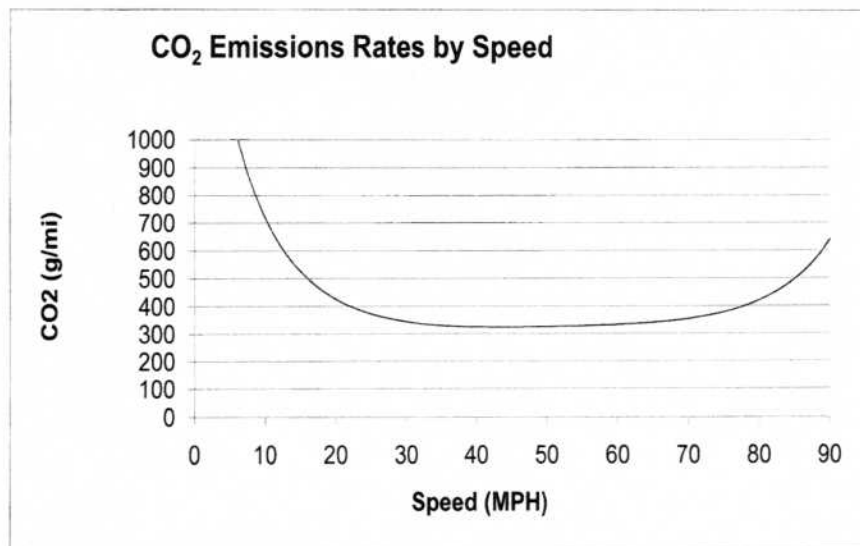
2. The 18-mile Dulles Loop encircling the airport will essentially need to be an eight-lane freeway by 2030, let alone by 2040, if the region is to maintain its access to Washington Dulles. Travelers, employees and air cargo approaching the airport from the south, the north and the west must use part of the Loop. When the Loop is congested, it can easily add 20 to 30 minutes to the airport trip and back-up the major roads leading into it. While short term improvements to the roads forming the Dulles Loop appear to be in the TIP, the CLRP carries no recognition of the longer term need, and this is a serious deficiency which will affect the entire region.
3. Restoration of two spot improvements to I-66 inside the Beltway as a matter of urgency, were noted in an earlier comment.
4. Tri-County Parkway: The EIS for the Tri-County Parkway selected a different “Bi-County” alignment between Prince William and Loudoun as the Locally Preferred Alternative, rather than the original alignment that included Fairfax County. The Task Force recommends that both the Bi-County and the original Tri-County alignments be kept in the CLRP. They will undoubtedly be needed, and the retention of the Tri-County Parkway in the CLRP will preserve the right-of-way for the future development of this road, largely as a local service at-grade artery. The southern portions of the Tri-County

Parkway from Manassas to I-66 also will provide relief for Route 28 between Centreville and Manassas. To underline the importance of the Bi and Tri-County Parkways, the Task Force notes that:

- The junction of Route 28 and I-66 now is the third largest freight chokepoint in the Commonwealth of Virginia. Delays at this intersection are costing the freight industry over half a million hours of delay a year, according to a Cambridge Systematics freight study conducted for the Commonwealth of Virginia. MWCOG's freight conference in April 2011 also highlighted the area between Dulles Airport and I-66 as a growing freight chokepoint in the region.
- A threefold increase in traffic by 2030 is forecast between Washington Dulles and I-66 and points south and west of I-66. Route 28 cannot accommodate that flow. The answer is to create a network of roads, including the Bi-County Parkway as a limited access facility to carry interregional traffic, and the Tri-County Parkway as an at-grade facility to handle local traffic.

While greenhouse gas emissions may not be part of the federal conformity analysis, it should be noted that:

- a) About one-third of Northern Virginia and suburban Maryland greenhouse gas emissions come from transportation. (Electric transit and vehicles have some benefit, but largely push the greenhouse gas production to the electric power generation.)
- b) Based on MWCOG figures, a threefold reduction in greenhouse gas production is achieved by increasing highway speeds from 10 mph to 30 mph. So, all interests should be able to find common cause in highway transportation improvements.

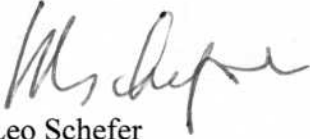


Source: UC Riverside based on southern California data, courtesy MWCOG

All these factors also underline the need for innovative thinking and innovative systems, even though such thought might be outside the limits created by federal requirements.

The Task Force would be happy to expand upon these issues with TPB Members and your staff, if that would be helpful.

Sincerely,

A handwritten signature in cursive script, appearing to read "Leo Schefer".

Leo Schefer

Action Committee for Transit

www.actfortransit.org

P.O. Box 7074, Silver Spring, MD 20907

July 14, 2012

The Honorable Todd Turner, Chair
National Capital Region Transportation Planning Board
777 North Capital Street NE, Suite 300
Washington, DC 20002-4239

Dear Chair Turner:

Action Committee for Transit offers the following comments for consideration regarding the draft 2012 Constrained Long Range Plan (CLRP). The I-270 Corridor highway expansion in Maryland, with a completion date of 2030, is listed as costing \$3.4 billion. Spending more than three billion dollars on widening I-270 is a not a good idea:

- While widening I-270 will reduce congestion initially, this is not a sustainable solution. Case in point: when I-270 was widened south of Shady Grove, the new lanes quickly filled up and the road was soon just as congested as it was before – except with many more cars.
- Note that just \$0.5 billion of the proposed \$3.4 billion for highway widening could fund the entire expansion and improvement of the MARC Brunswick line, which travels in the I-270 corridor. The MTA's MARC Growth and Investment Plan is not currently funded in the CLRP.
- Finally, the I-270 highway construction would preclude extension of the Metro Red Line to Germantown by removing the existing right of way along I-270 in which the extension could be built most cost-effectively. With METRO as the backbone of transit in the metropolitan area, we must not close off future transit options.

A plan drawn up five years ago by Maryland transportation planners, called the MARC Growth and Investment Plan, would vastly improve service on the commuter train line from Washington to Frederick and Brunswick. Trains would run all day in both directions, and in rush hour trains would run every 15 minutes from Union Station through Rockville and Germantown to Point of Rocks. Rush-hour trains would go to Frederick and Brunswick every half hour. Trains would also run mid-day, evenings, and weekends, but less frequently.

The current lull in gas prices is temporary; over the long haul an upward price trend is more likely. The CLRP is a long range plan and future increases in gas prices will destabilize current patterns that make reliance on private automobiles the ubiquitous mode that it is today. Citizens will expect their governments to have forecast these trends and to have made plans for transportation alternatives to the personal automobile. Swapping out some highway projects for more transit can also improve our region's air quality problem.

The Action Committee for Transit asks that the MARC Growth and Investment Plan be included in the CLRP.

Sincerely,



Tina Slater
Action Committee for Transit, President
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