National Capital Region
Transportation Planning Board

TRANSPORTATION PLANNING BOARD

Wednesday, September 21, 2016
12:00 - 2:00 P.M.
Walter A. Scheiber Board Room

SPECIAL WORK SESSION

- **10:30 - 11:45 A.M.** Meeting of the Long-Range Plan Task Force
  (Walter A. Scheiber Board Room)

AGENDA

12:00 P.M. **1. PUBLIC COMMENT ON TPB PROCEDURES AND ACTIVITIES**
Tim Lovain, TPB Chairman

Interested members of the public will be given the opportunity to make brief comments on transportation issues under consideration by the TPB. Each speaker will be allowed up to three minutes to present his or her views. Board members will have an opportunity to ask questions of the speakers, and to engage in limited discussion. Speakers are encouraged to bring written copies of their remarks (65 copies) for distribution at the meeting.

12:20 P.M. **2. APPROVAL OF THE MINUTES OF THE JULY 20 MEETING**
Tim Lovain, TPB Chairman

12:25 P.M. **3. REPORT OF THE TECHNICAL COMMITTEE**
Tim Roseboom, TPB Technical Committee Chairman

12:30 P.M. **4. REPORT OF THE CITIZENS ADVISORY COMMITTEE**
Doug Stewart, TPB Citizens Advisory Committee Chairman

12:40 P.M. **5. STEERING COMMITTEE ACTIONS AND REPORT OF THE DIRECTOR**
Kanti Srikanth, TPB Staff Director

This agenda item includes Steering Committee actions, letters sent/received, and announcements and updates.

12:45 P.M. **6. CHAIRMAN'S REMARKS**
Tim Lovain, TPB Chairman

INFORMATION ITEMS

12:50 P.M. **7. BRIEFING ON THE RELEASE OF A REGIONAL CARPOOLNOW MOBILE APPLICATION**
Nicholas Ramfos, TPB Operations Programs Director

The board will be briefed on a new regional mobile app for dynamic carpooling designed for smartphones and tablets. This new Commuter Connections software product called CarpoolNow will make it possible for a commuter to look for a ride in real-time. Those using the system are either commuters looking for rides or travelers offering rides. The mobile app also allows for commuters to formally register for Commuter Connections and its other services such as Guaranteed Ride Home.

1:00 P.M. **8. BRIEFING ON THE STATE OF THE COMMUTE REPORT**
Nicholas Ramfos, TPB Operations Programs Director

Every three years since 2001, Commuter Connections has conducted a random sample survey of employed persons in the Metropolitan Washington Region to monitor trends in commuting behavior such as mode shares, telecommuting, and distance traveled, as well as attitudes about commuter assistance services. The Board will be briefed on the highlights from the 2016 State of the Commute Survey.

1:20 P.M. **9. BRIEFING ON THE FY 2017-2022 TRANSPORTATION IMPROVEMENT PROGRAM (TIP) AND THE TIP FORUM**
Andrew Austin, TPB Transportation Planner

The board will be briefed on the TIP Forum, an event required by the federal planning regulations, which occurred on September 15 as part of the Citizens Advisory Committee's monthly meeting.

1:30 P.M. **10. BRIEFING ON MITIGATION ACTIONS AND EXPERIENCES FROM WMATA'S SAFETRACK SURGE ACTIVITIES**
Eric Randall, TPB Transportation Engineer

The board will be briefed on experiences and mitigation actions taken by local jurisdictions and WMATA at locations that have recently undergone significant safety and maintenance work as part of WMATA's SafeTrack work plan.

1:50 P.M. **11. BRIEFING ON FEDERAL PLANNING REGULATIONS**
Kanti Srikanth, TPB Staff Director
Eric Randall, TPB Transportation Engineer

The board will be briefed on formal comments submitted by TPB to the United States Department of Transportation (US DOT) in response to proposed rulemaking for Metropolitan Planning Organization Coordination and Planning Area Reform. In addition, the board will be briefed on upcoming requirements for setting targets for transit asset management by the region's providers of public transportation and for the metropolitan planning area.

2:00 P.M. **12. ADJOURN**

The next meeting is scheduled for October 19, 2016.

MEETING AUDIO

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listen to recorded audio from past meetings at:
www.mwcog.org/TPBmtg

TRANSPORTATION PLANNING BOARD
MEETING MINUTES

July 20, 2016

MEMBERS AND ALTERNATES PRESENT

Bob Brown, Loudoun County
Rick Canizales, Prince William County
James Davenport, Prince William County
Allison Davis, WMATA
Marc Elrich, Montgomery County
Dan Emerine, DC Office of Planning
Gary Erenrich, Montgomery County DOT
Jason Groth, Charles County
Rene'e Hamilton, VDOT
Konrad Herling, City of Greenbelt
Sandra Jackson, FHWA
Catherine Hudgins, Fairfax City Board of Supervisors
John Jenkins, Prince William County
Julia Koster, NCPC
R. Earl Lewis, Jr. MDOT
Moises Marrero, FHWA
Phil Mendelson, DC Council
Bridget Donnell Newton, City of Rockville
Mark Rawlings, DC DOT
Kelly Russell, City of Frederick
Jarrett K. Smith, City of Takoma Park
Linda Smyth, Fairfax County Board of Supervisors
Todd Turner, Prince George's County
Jonathan Way, Manassas City
David Whitaker, Frederick County
Sam Zimbabwe, DDOT

MWCOG STAFF AND OTHERS PRESENT

John Swanson
Andrew Meese
Nicholas Ramfos
Ron Milone
Eric Randall
Rich Roisman
Dusan Vuksan
Mark Moran
Wendy Klancher
Jane Posey
Andrew Austin
Michael Farrell
Jon Schermann
Wenjing Pu
Ben Hampton
Bryan Hayes
Abigail Zenner

Sergio Ritacco	
Lamont Cobb	
Jessica Mirr	
Debbie Leigh	
Deborah Etheridge	
Samantha d'Addario	
Steve Kania	COG/OPA
Sarah Crawford	Arlington County
Kari Snyder	MDOT
Patrick Durany	Sup. Jenkins' Office/PWC
Tanya Emam	FHWA
Sam Rosen-Amy	DC Council
Yon Lambert	City of Alexandria
Pierre Holloman	City of Alexandria
K. Jane Williams	MDOT, Director Washington Area Transit Office
Bill Orleans	HACK
Mike Lake	Fairfax County
Cynthia Porter-Johnson	PRTC
Robert Whitfield	Fairfax County Taxpayers Alliance
Patricia Happ	NVTC
Nancy Abeles	TPB/CAC
Stewart Schwartz	CSG
Norman Whitaker	VDOT-NOVA

Vice Chair Bridget Newton presided over the meeting as Chair Tim Lovain was away.

1. PUBLIC COMMENT ON TPB PROCEDURES AND ACTIVITIES

No members of the public signed up to speak.

2. APPROVAL OF MINUTES OF THE MAY 18 MEETING

A motion was made to approve the minutes from the June 15, 2015 board meeting. The motion was seconded and was approved unanimously.

3. REPORT OF THE TECHNICAL COMMITTEE

Mr. Roseboom reported on the work of the Technical Committee. He gave an overview of the written report provided in the meeting materials. The Technical Committee met on July 8 and received briefings on the Maryland Transportation Alternatives Program, Car-Free Day, an Analysis of SafeTrack, and the plan for updating the regional travel demand forecast. He said the committee discussed how the current travel demand model is used and how changes would affect modeling for local jurisdictions. He also reported that the Technical Committee received informational briefings about a parking study by the District of Columbia Office of Planning, the congestion management process and the TPB Regional Bus Priority Project.

4. REPORT OF THE CITIZEN ADVISORY COMMITTEE

Mr. Stewart said that at the July 14 meeting, the CAC continued its discussion about how the committee can add value to the development of the long-range plan. He said that the committee was briefed on the progress of the Long-Range Plan Task Force and the analysis of an all-build scenario. As part of future activities of the task force, Mr. Stewart emphasized that the CAC strongly urges that public input

be sought to give residents of the area an opportunity to weigh in and provide input about which projects are most are important. He added that the CAC recommends that TPB staff develop a plan for public input into the long-range plan update. He said the committee feels that there should be multiple points of engagement throughout the process.

Mr. Stewart said that the committee was also briefed on the first SafeTrack surge. He said the committee also did a mid-year review of the CAC work plan. The committee agreed to continue spending most of their remaining time this year advocating for public involvement in the long-range plan update.

5. REPORT OF STEERING COMMITTEE

Mr. Srikanth reported on the information provided in the meeting materials from the Steering Committee. He reported on approved amendments to the TIP. He also went over letters that were received and memos to the board including two Fast Lane grants for the Arlington Memorial Bridge reconstruction and for the Atlantic Gateway project in Virginia. He also reported on a workshop that the Bicycle and Pedestrian Subcommittee hosted about separated bike lanes and the recent meeting of the Access for All Committee.

Mr. Srikanth also reviewed US DOT's proposed changes to the planning rules that govern the planning activities of MPOs. He said he believed the proposed provisions were quite substantive, and if finalized as proposed, they would require MPOs to work with the states to reassess how regional planning is conducted. He noted that part of the activities would, at a minimum, require consultation with the state DOTs and adjacent MPOs regarding MPO boundaries and the area for which MPOs will have responsibility to conduct regional planning and new agreements would need to be executed with the states and adjacent MPOs. There would also be a new set of activities around coordination and developing the CLRP, the TIP, performance targets as required on the performance-based planning and programming, and also conducting air quality conformity analysis.

Mr. Srikanth said that based on his conversation with his counterparts in the adjacent MPOs and with members of the Association of MPOs, the National Association of Regional Councils, and the American Association of State and Highway Transportation Officials (AASHTO), there are considerable concerns identified with these proposed changes. He said there has been at least one meeting with the Secretary of Transportation, and a subsequent meeting with the Federal Highway Administration, which has already conducted one webinar on the subject and will host another in the future.

Mr. Srikanth informed the board that comments on the proposed federal rules were due on August 26. Because there are no board meetings scheduled in August, he proposed that TPB staff should work with the TPB officers to develop comments on the proposed rules that could be submitted to the federal docket by August 26. This proposal was accepted.

Mr. Turner asked Mr. Srikanth for more information about the rule changes.

Mr. Srikanth summarized the proposed changes to the planning process. He addressed the proposed changes in three groups. He said that in group one, there are changes to how the planning area for a MPO is defined. He said that the proposed rule would revise the regulatory definition of the metropolitan planning area to include, at a minimum, an entire urbanized area as defined by the Census based on current population and also include contiguous areas that could become urbanized in the next 20 years. He said that in the TPB's case, this could be a huge swath of area extending from Fredericksburg, from Stafford, all the way into Delaware and Pennsylvania.

The second group of proposed changes is that such a planning area should have a single MPO by default. The rules do acknowledge that in some cases the area could be large and in such cases, as an exemption to the rule, the Governors and the multiple MPOs would have to make a determination that the size and complexity of the area would merit creating multiple MPOs, rather than a single MPO.

The third group of changes notes that in instances where there are multiple MPOs for a given planning area, there should be a single long-range plan and a single TIP, a single conformity analysis on the joint plan, and all of these multiple MPOs in this large area should have coordinated performance targets.

6. CHAIR'S REMARKS

The chair made no remarks.

INFORMATION ITEMS

7. APPROVAL OF THE NATIONAL CAPITAL REGION FREIGHT PLAN

Mr. Schermann said that no substantive changes have been made to the draft Capital Regional Freight Plan following a presentation to the board in June and a public comment period. He reminded the board that the plan comes in two documents, an executive summary and the plan itself. He said that the plan covers a wide range of topics, from the underlying drivers of freight demand to the changing nature of supply change, as well as other freight-related issues. He said that this version of the plan differs from the 2010 plan in that it includes a policy section. He said that the plan also includes a set of recommendations intended to guide TPB staff.

A motion was made to adopt TPB Resolution R1-2017 approving the National Capital Freight Plan. The motion was seconded and was approved unanimously.

8. APPROVAL OF PROJECTS RECOMMENDED FOR FUNDING UNDER THE FY 2017 SURFACE TRANSPORTATION BLOCK GRANT SET ASIDE PROGRAM FOR SUBURBAN MARYLAND TPB JURISDICTIONS

Mr. Cobb presented the Maryland projects for approval as the TPB's selections for the FY 2017 Surface Transportation Block Grant Set Aside Program. The 2015 FAST Act requires that MPOs work with states to administer a portion of Surface Transportation Program funds, as a set aside. The set aside is the new iteration of the Transportation Alternatives Program from the 2012 MAP-21 legislation. TPB staff worked with Maryland SHA to administer the program, and to form a selection panel to review applications and to make recommendations. The selection panel recommended the TPB approve five projects for $1,100,114 in funding through resolution R2-2017.

Mr. Turner gave his thanks to the selection panel and noted the projects in Prince George's County, particularly those focused on Safe Routes to School. He made a motion to approve the recommendations.

The motion was seconded and was approved unanimously.

Ms. Russell expressed her thanks regarding the project in the City of Frederick.

9. APPROVAL OF REGIONAL CAR FREE DAY 2016 PROCLAMATION

Referring to the handout and mailout material, Mr. Ramfos briefed the board on Car-Free Day. He provided background on this annual international event, which the TPB first sponsored in 2008. He described some activities that occur around the world. He spoke about last year's Car-Free Day, including press coverage. He said people can sign a pledge to go car-free at www.carfreemetrodc.org. He described the media strategy for this year's event and local activities that are planned. He said the goal this year is to get 10,000 pledges.

Mr. Erenrich noted that Car-Free Day would coincide with a SafeTrack surge on the Orange Line in

Virginia. He said the message of Car-Free Day could potentially be seen to conflict with SafeTrack's message to find alternative modes other than transit.

Mr. Ramfos said the organizing committee for Car-Free Day hopes that other alternative modes can be promoted, such as teleworking or bicycling.

Mr. Erenrich suggested that for SafeTrack Surge #9 in Northern Virginia, an alternative day for Car-Free Day might be offered.

Mr. Zimbabwe asked how the pledge goal of 10,000 compared to last year's goal.

Mr. Ramfos said the goal was the same as last year. He said that the Pope's visit occurred during Car-Free Day last year, so the goal was not achieved.

Mr. Zimbabwe said that SafeTrack's messaging does not explicitly call upon people to drive during SafeTrack surges, but rather it reminds people to seek other options or at least be aware that single-tracking will make the commuting process slower. He asked whether in the future, it might be possible to conduct more extensive events around Car-Free Day like those conducted in European cities.

Mr. Ramfos said that the planning committee has discussed whether the "open streets" concept, which used in European cities, could be done here. He said implementing such an event would be challenging, but he said that the committee would be open to exploring such ideas in the future.

Mr. Srikanth explained that the "open streets" idea requires a local jurisdiction to take the regulatory action necessary to shut down part of the street or a network of streets for a certain amount of time.

Mr. Ramfos said that in the future, it may be possible to coordinate an amalgamation of events that occur around the region during the week of Car-Free Day.

A motion was made to approve the proclamation for Car-Free Day. The motion was seconded and was approved unanimously.

10. BRIEFING ON MITIGATION ACTIONS AND EXPERIENCES FROM WMATA'S SAFETRACK SURGE ACTIVITIES

Mr. Randall went over a presentation outlining what all the jurisdictions have been doing to mitigate the effects of SafeTrack. He said they are implementing a number of strategies but that overall, the most important factor is clear communication for people traveling in the affected area.

Mr. Hamre then went over how Metrobus has been working to mitigate the effects on the rail system. He explained that each surge has a different set of challenges and that communication and planning is critical.

Mr. Erenrich asked a question about bus availability from Greenbelt to New Carrolton.

Mr. Hamre explained that Metro plans to have standby buses available and that in single tracking sections, Metrorail has enough capacity to get people through.

A question was asked about people using other modes to get through SafeTrack areas.

Mr. Randall explained that TPB staff is in the process of gathering the data about how people are switching modes during these safety surges.

Mr. Turner asked about the actual work that is being done.

Ms. Sullivan answered that reports were provided in the meeting materials about the work that Metro has done during these safety surges. She also noted that the information is available on the website.

Mr. Mendelson asked about how Metro is getting the word out to customers who rely on the service. He said that the first surge was widely reported but that he felt that the information diminished over time.

Ms. Sullivan explained that Metro is working through their marketing team to get the word out for people who use the affected stations. She noted that the media has also been reporting on the surges.

Ms Hudgins talked about how to get the word out on alternatives that people can use. She said that working with the business community was key.

Mr. Zimbabwe noted that while it was important to help people find alternatives while the work is being done that he also wanted to be sure that people knew when to come back to Metro after work is completed.

11. STRATEGIC PLAN FOR THE DEVELOPMENT OF THE TPB TRAVEL DEMAND MODEL

Mr. Milone said that Mr. Moran would provide an overview of TPB staff's efforts to improve its travel demand modeling and forecasting model.

Mr. Moran's presentation covered current uses of the TPB travel demand model, the TPB model development program, and TPB staff's strategic plan for model development. He said the travel forecasting subcommittee provides oversight on the model for staff. The TPB currently uses an aggregate, trip-based four-step model, with annual updates. Staff researches peer MPOs and found most to be using or switching to a more detailed, activity-based model. After discussion with the subcommittee and other regional stakeholders, Mr. Moran said that TPB staff developed a seven-year strategic plan to implement an activity-based model in three phases. Phase I includes updates to the existing travel demand model for this year and next year. Phase II will take three years, involving the developing of the activity-based model using existing data. Phase III will last two years, involving the development of the activity-based model using new data.

Mr. Elrich asked if staff would be testing the new model to assess impacts of projects and provide data that is more reliable.

Mr. Moran commented that the TPB's model focuses on the regional level. He said that county-level analysis would be slightly different. He noted that the dynamic traffic modeling conducted by the University of Maryland would be time intensive for the TPB. He also said that only two of the TPB's peer MPOs did dynamic modeling. He said this type of modeling would be exceptional at the regional level.

Mr. Elrich mentioned the Transportation Research Board's review of the TPB's travel demand model roughly ten years ago. He stated that his office was working with the University of Maryland to create a more fine-grained tool for analysis. He said there was a difference between detailed analysis versus that of the TPB model.

Mr. Srikanth remarked that there are differences between operational models and regional-level long-term travel forecasts. He said the TPB has worked with several types of models in the past, but emphasized that models produced by the University of Maryland and the Commonwealth of Virginia are sub-area operational models.

Mr. Elrich said that with Northern Virginia, as well as the state of Maryland, completing this fine-grained analysis for their respective jurisdictions, the TPB should be able to handle the magnitude of analysis.

Mr. Moran commented that the TPB's consultant on this project, Cambridge Systematics, has not recommended the TPB pursue a model similar to that of the University of Maryland.

OTHER ITEMS

12. ADJOURN

No other business was brought before the board. The meeting adjourned at 1:59 p.m.

Item 3

TPB Technical Committee September 9 Meeting Highlights

September 15, 2016

The Technical Committee met on September 9 in the Ronald F. Kirby Training Center at COG. The following items were reviewed for inclusion on the TPB's July agenda:

- TPB agenda item 8

  Staff briefed the committee on the highlights from the 2016 State of the Commute Survey, a random sample survey of employed persons in the Metropolitan Washington Region to monitor trends in commuting behavior such as mode shares, telecommuting, and distance traveled, as well as attitudes about commuter assistance services. The survey has been conducted every three years since 2001. Committee members were impressed by the extra efforts that were taken to survey cell phone households and millennials, as well as the survey's focus on telework, including episodic telework and the potential for growth in teleworking.

- TPB agenda item 9

  Staff briefed the committee on the contents of the TIP and the process for developing it. The committee was also briefed on the TIP Forum, an event required by the federal planning regulations, which is scheduled to take place on September 15 as part of the Citizens Advisory Committee's monthly meeting.

- TPB agenda item 10

  The committee was updated on plans to brief the board on experiences and mitigation actions being taken by local jurisdictions and WMATA as part of WMATA's SafeTrack work plan.

- TPB agenda item 11

  Staff briefed the committee on the formal comments submitted by the TPB to the United States Department of Transportation (US DOT) in response to proposed rulemaking for Metropolitan Planning Organization Coordination and Planning Area Reform. In addition, the committee was briefed on upcoming requirements for setting targets for transit asset management by the region's providers of public transportation and for the metropolitan planning area. Committee members expressed concern about the proposed MPO regulations because of the size and complexity of the TPB region and all the adjacent MPO regions.

- TPB work session

  Staff briefed the committee on the results of an analysis comparing the system performance of the TPB's Constrained Long-Range Plan (CLRP) with an "All-Build" Scenario that includes unfunded transportation projects from the plans of the TPB's member jurisdictions (as well as the CLRP). This analysis is part of the ongoing work of the TPB' Long-Range Plan Task Force.

The following item were presented for information and discussion:

- Staff briefed the committee on federal requirements for Metropolitan Planning Organizations (MPOs) related to Title VI and Environmental Justice (EJ) analysis. The briefing included a description of the TPB's past approach to the EJ analysis of the Constrained Long-Range Plan (CLRP) and the revised approach, which will include the identification of "Communities of

Concern." Staff plans to present the "Communities of Concern" to the Technical Committee and the TPB later this year.

- As a follow up to the July presentation on the Congestion Management Process, staff provided additional information with a focus on the revised process for identifying bottlenecks. The remainder of the report is unchanged. The next step for the CMP is to finalize and publish the document.
- Staff briefly described the planned TPB-sponsored conference in the October/November time frame to discuss opportunities for improving traffic incident response.
- Staff from the District Department of Transportation (DDOT) briefed the committee on a study of multi-modal congestion in the District that was mandated last year by the DC Council. The study has been conducted to: assess the current state of congestion in the District; collect data that demonstrates average commute times for District residents; recommend strategies for remedying existing congestion problems; and develop one-year, 3-year, and 5-year plans for implementing the recommendations. The study is scheduled to be completed by the end of September.
- The committee was briefed on the current status of the TPB Regional Priority Bus Project, which includes 15 project components being implemented by five project owners under a $58.8-million TIGER grant administered by FTA.
- Following upon the work of the Multi Sector Working Group (MSWG) on Greenhouse Gas Emissions Reductions, staff briefed the committee on a recently completed survey of the TPB's member jurisdictions regarding potential strategies for emissions reductions and the next steps.

TPB TECHNICAL COMMITTEE MEMBERS AND ALTERNATES
ATTENDANCE – September 9, 2016

DISTRICT OF COLUMBIA

DDOT	Mark Rawlings
DCOP	Dan Emerine

MARYLAND

Charles County	Jason Groth
	Ben Yeckley
Frederick County	-------
City of Frederick	-------
Gaithersburg	-------
Montgomery County	Gary Erenrich
Prince George's County	Anthony Foster
Rockville	-------
M-NCPPC	
Montgomery County	-------
Prince George's County	-------
MDOT	Kari Snyder
Takoma Park	-------

VIRGINIA

Alexandria	Pierre Holloman
Arlington County	Dan Malouff
City of Fairfax	-------
Fairfax County	Mike Lake
	Malcolm Watson
Falls Church	-------
Fauquier County	-------
Loudoun County	Robert Brown
Manassas	-------
NVTA	Sree Nampoothiri
NVTC	Dan Goldfarb
	Patricia Happ
Prince William County	James Davenport
PRTC	Betsy Massie
VRE	Sonali Soneji
VDOT	Norman Whitaker
VDRPT	Tim Roseboom
NVPDC	-------
VDOA	-------

WMATA	Allison Davis

FEDERAL/REGIONAL

FHWA-DC	-------
FHWA-VA	-------
FTA	-------
NCPC	-------
NPS	-------
MWAQC	-------
MWAA	-------

COG STAFF

Kanti Srikanth, DTP
Lyn Erickson, DTP
Ron Milone, DTP
Andrew Meese, DTP
Nick Ramfos, DTP
Bill Bacon, DTP
Michael Farrell, DTP
Charlene Howard, DTP
Ken Joh, DTP
Wendy Klancher, DTP
Jessica Mirr, DTP
Mark Moran, DTP
Erin Morrow, DTP
Jane Posey, DTP
Wenjing Pu, DTP
Eric Randall, DTP
Sergio Ritacco, DTP
Rich Roisman, DTP
Jon Schermann, DTP
Daivamani Sivasailam, DTP
John Swanson, DTP
Dusan Vuksan, DTP
Feng Xie, DTP
Lori Zeller, DTP
Abigail Zenner, DTP
Greg Goodwin, DCPS
John Kent, DCPS

OTHER

Alex Brun, MDE
Stephanie Dock, DDOT
Bill Orleans
Nancy Smith

National Capital Region
Transportation Planning Board

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

National Capital Region
Transportation Planning Board

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

TPB SR7-2017
September 9, 2016

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.

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

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

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

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

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

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

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

TPB SR8-2017
September 9, 2016

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)

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

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
From:
To:

CMAQ	80/20/0	400 a		10,100 c	3,300 c				13,400
DEMO	80/20/0	732 a	500 a 1,200 c	660 a	300 a				2,660
								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

National Capital Region
Transportation Planning Board

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.

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@mwcog.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:

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

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:
>
> $$Average\ Truck\ Speed\ (s) = \frac{\frac{1}{120} + \frac{1}{60}}{2} \times 60 \times 60 = 45\ mph$$
>
> 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:
>
> $$Average\ Truck\ Speed\ (s) = \frac{2}{\frac{120}{1} + \frac{60}{1}} \times 60 \times 60 = 40\ mph$$
>
> 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.

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@mwcog.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 a 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	• Percent of commuters using mode	Daily average	Pedestrian Bicycle Transit Auto
	Commute Time	• Average commute time • Commute time distribution	Daily average	Pedestrian Bicycle Transit Auto Overall

Category	Measure	Outputs	Temporal	Modes
Reliability	Auto Travel Time Reliability	• Top 10 most reliable/unreliable roads by planning time index, arterials and freeways separately • Planning time index for arterials	• AM & PM peak • Over the day and over the week	Auto
	Bus On-Time Performance	• 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	•Average bus stop level activity by time period • Route level ridership – citywide and top 10 routes	• Over the day (by time period) • Daily	Bus
	Bus Overcrowding	• 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	• 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,

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.

My telephone number is 410-865-1000
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7201 Corporate Center Drive, Hanover, Maryland 21076

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.

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 CO_2 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 CO_2 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 redutctions 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 AAHSTO'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

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

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 Principles[1], 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 Assignment[2] 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.

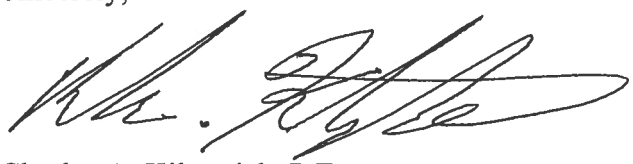
Finally, VDOT requests that FHWA specify the process for a state to obtain approval of an equivalent data set to include all information that would need to be submitted and the response time. For example, in 490.103(e)(5)(ii)(B), the proposed rule requires that the equivalent data set shall include "Average 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,



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.

<u>The TPB considers this to be the most onerous and impracticable change to the metropolitan planning process.</u> 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.

- **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.

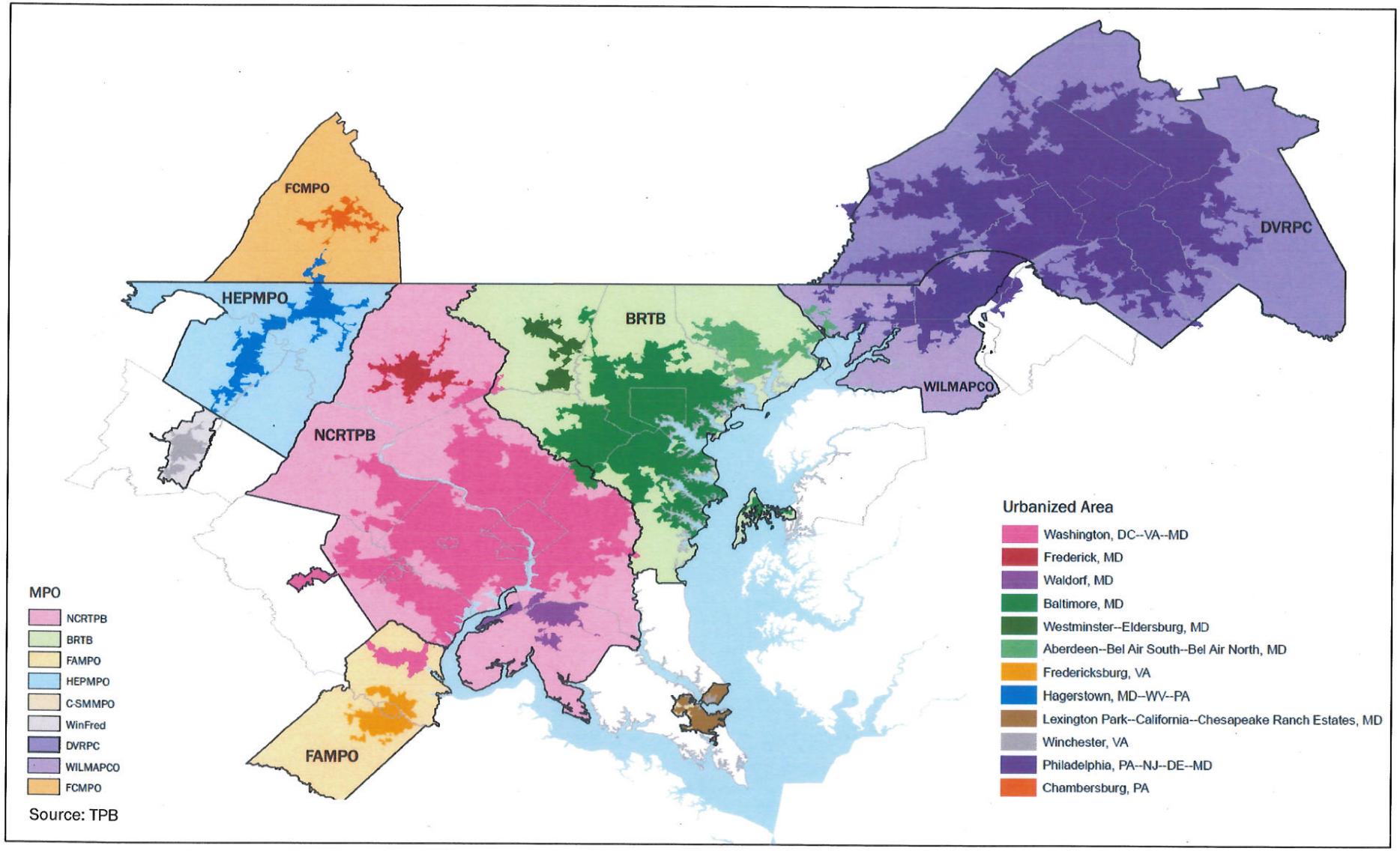
If you have any questions or would like to discuss this matter further, please contact TPB Staff Director Kanti Srikanth at ksrikanth@mwcog.org or (202) 962-3257.

Sincerely,

Timothy Lovain

Tim Lovain
TPB Chairman

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



National Capital Region
Transportation Planning Board

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.

National Capital Region
Transportation Planning Board

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

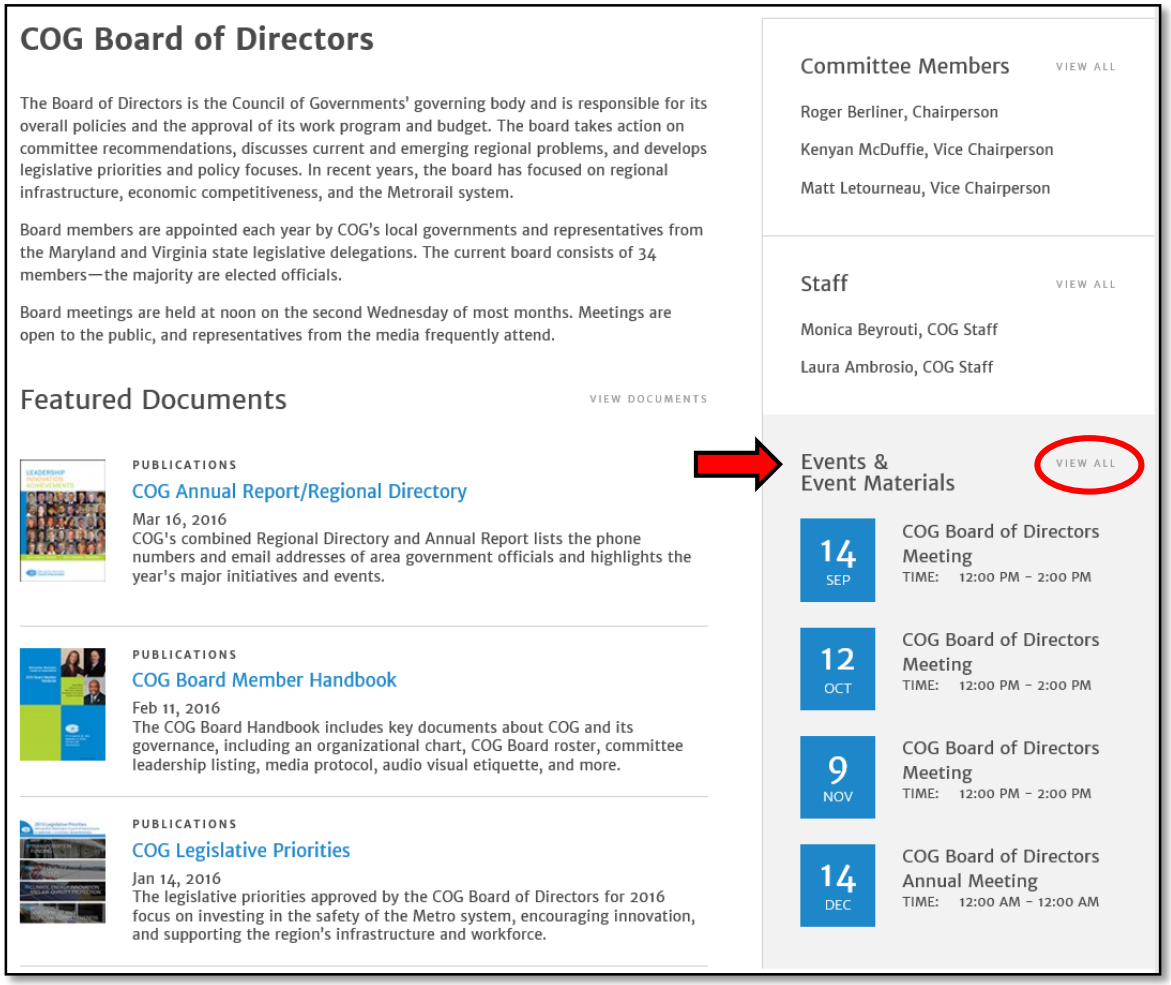
1. **How do I find information for my committee?**

   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.

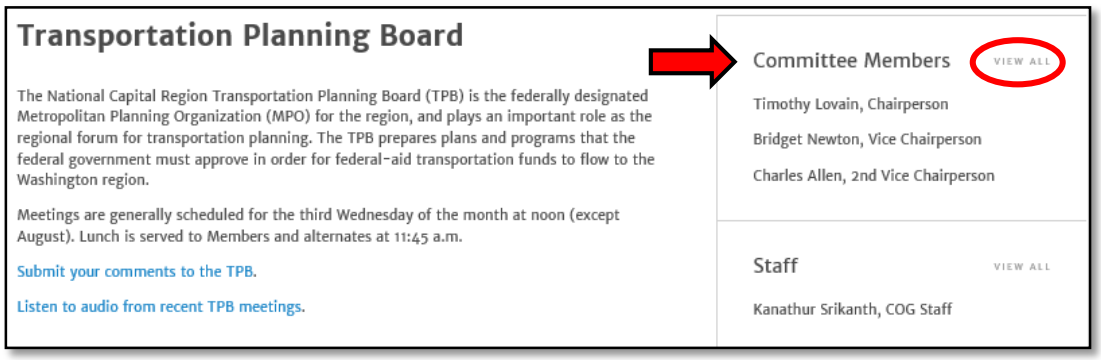
2. **Where is meeting information located?**

   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.



3. **Where is the list of committee members?**

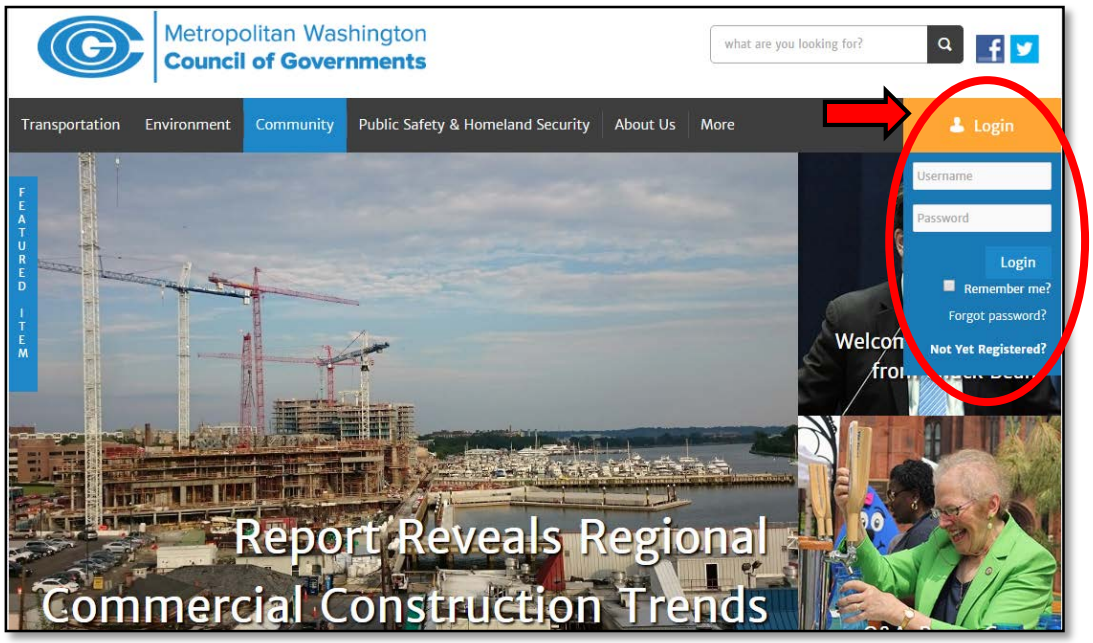
Along with meeting dates and materials, the list of committee members can be found on your committee page. Click on 'View All' at the top right side of the committee page.



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.

PUBLIC FORUM

FY 2017-2022 Transportation Improvement Program (TIP)

Andrew Austin
TPB Transportation Planner

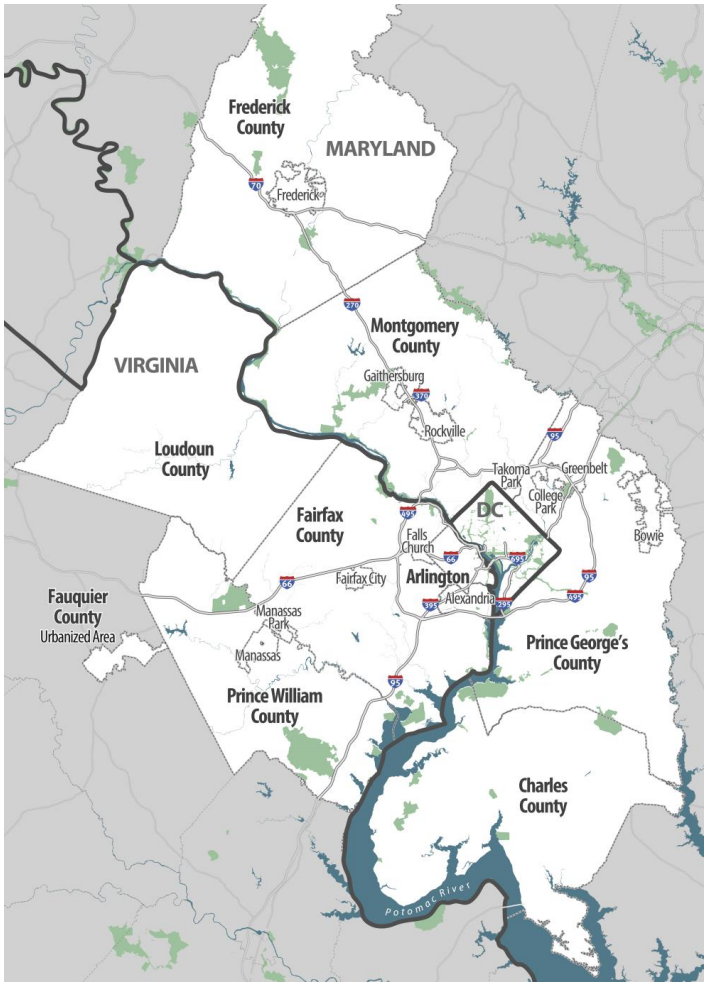
Thursday, September 15, 2016

Agenda

- Introduction to the TPB, CLRP, and TIP
- Project Selection & Funding by the Region's Transportation Agencies
- Development and Review of the FY 2017-2022 TIP
- Questions & Answers with Regional Planners and State Officials

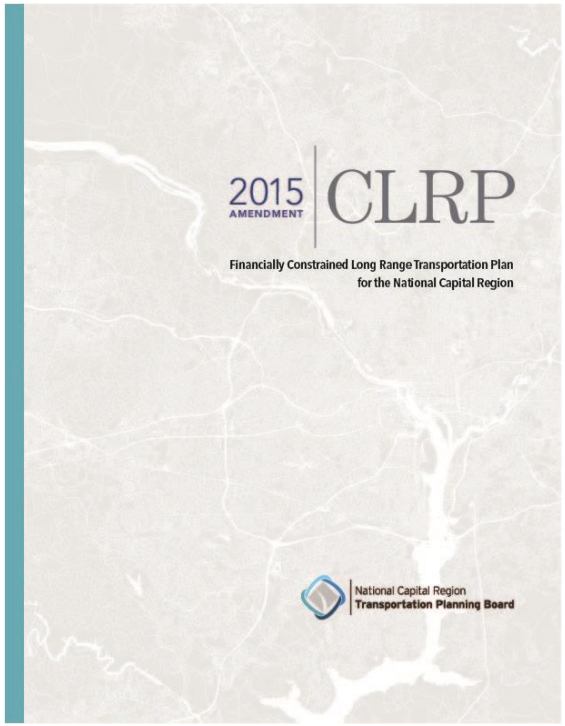
About the TPB

- National Capital Region Transportation Planning Board (TPB) is the federally designated Metropolitan Planning Organization (MPO) for the region
- Plays an important role as the regional forum for transportation planning
- Prepares plans and programs that the federal government must approve in order for federal-aid transportation funds to flow to metropolitan Washington



The CLRP

- Financially Constrained Long-Range Transportation Plan (CLRP)
- Developed cooperatively by the region's Transportation and Transit agencies
- All regionally significant projects and programs
- Hundreds of road and transit projects
- Financially Constrained: funds must be "reasonably expected to be available"
- Must meet air quality standards
- Must cover 20-year period. Horizon Year: 2040
- Major update every four years
    - Amended on an annual basis



The TIP

- Transportation Improvement Program (TIP)
- Federal Requirements
  - Must cover at least a 4-year period and be updated every 4 years
  - Funding in the first two fiscal years must be “available and committed”
  - Funding in third and fourth years must be “reasonably expected to be available”
  - Additional years may be provided for illustrative purposes
- National Capital Region TIP covers 6 years to match state and District programming documents
- Formally updated every two years
  - Amended monthly as needed

The TIP

- Following approval, the District of Columbia, Maryland, and Virginia incorporate their respective portions of the TIP into their own Statewide Transportation Improvement Programs (STIPs)
- STIPs are submitted to Federal Highway Administration and Federal Transit Administration for approval
- Must remain consistent with TPB's TIP

Project Selection & Funding in DC

- moveDC: 25-year long-range, multimodal transportation plan
  - Adopted in 2014
  - Two-year action plan for specific capital improvements
- Statewide Transportation Improvement Program (STIP)
  - Six-year program
  - Consistent with moveDC
  - Updated biannually

Project Selection & Funding in DC

- FY 2017-2023 STIP currently under development
  - Initiating “Call for Projects” within DDOT
  - Public comment opportunities in November 1 – 30, 2016
  - ddot.dc.gov/page/State-Transportation-Improvement-Program
- Will be submitted to TPB as an amendment to the FY 2017-2022 TIP in early 2017
  - 30-day TPB public comment opportunity

Project Selection & Funding in Maryland

- 2035 Maryland Transportation Plan (MTP): long-range, multimodal transportation plan
  - Adopted in 2014, revised in 2016
- County Priority Letters and Secretary's Annual Tour
- Consolidated Transportation Plan (CTP)
  - Six-year capital budget document
  - Updated annually
  - Currently approved: FY 2016-2021 CTP

Project Selection & Funding in Maryland

- Draft FY 2017-2022 CTP published September 2016
  - Included in current draft of TPB's FY 2017-2022 TIP
  - Tour dates:
    - October 13 – Frederick County
    - October 18 – Charles County
    - November 10 – Montgomery & Prince George's Counties
    - mdot.Maryland.gov/newMDOT/planning/CTP/2016_CTP_Tour/index.html
  - Submit to Maryland Legislature in January 2017
  - Approval scheduled April 2017

Project Selection & Funding in Maryland

- Statewide Transportation Improvement Program (STIP)
  - Four-year program
  - Must be updated at least every four years
  - Uses Fall Tour for public involvement
  - FY 2017 STIP approved August 2016
    - Currently includes TPB's FY 2015-2020 TIP as amended
    - Will be updated following approval of FY 2017-2022 TIP

Project Selection & Funding in Virginia

- 2035 Virginia Surface Transportation Plan (VSTP): long-range, multimodal plan
  - Updated 2013; 2040 Plan now being developed
- Northern Virginia Transportation Authority (NVTA) TransAction 2040
  - Approved 2012; Update currently underway
- Six-Year Improvement Program (SYIP)
  - Six-year planned spending document
  - Updated annually
  - Public meetings annually. Next meeting December 13
  - virginiadot.org/2016fallmeetings/default.asp

Project Selection & Funding in Virginia

- Statewide Transportation Improvement Program (STIP)
  - Four-year program
  - Updated every three years
  - FY 2015-2018 STIP includes TPB's FY 2015-2020 TIP as amended
- FY 2018-2021 STIP under development
  - Will be submitted to TPB as an amendment to the FY 2017-2022 TIP March 2017
    - 30-day public comment opportunity
  - VDOT/DRPT public involvement opportunities May – June 2017

Project Selection & Funding for WMATA

- Momentum: long-range strategic plan
  - Approved 2013
  - Metro 2025: near-term expansion component, not yet funded
- Capital Improvement Program (CIP)
  - Six-year capital budget – funded by federal, state and local sources through Interstate Compact
  - Updated annually

Project Selection & Funding for WMATA

FY 17 Capital Budget and FY 2017-2022 CIP

- Approved April 2016
- Included in TPB's FY 2015-2020 TIP as amended

FY 18 Capital Budget and FY 2018-2023 CIP

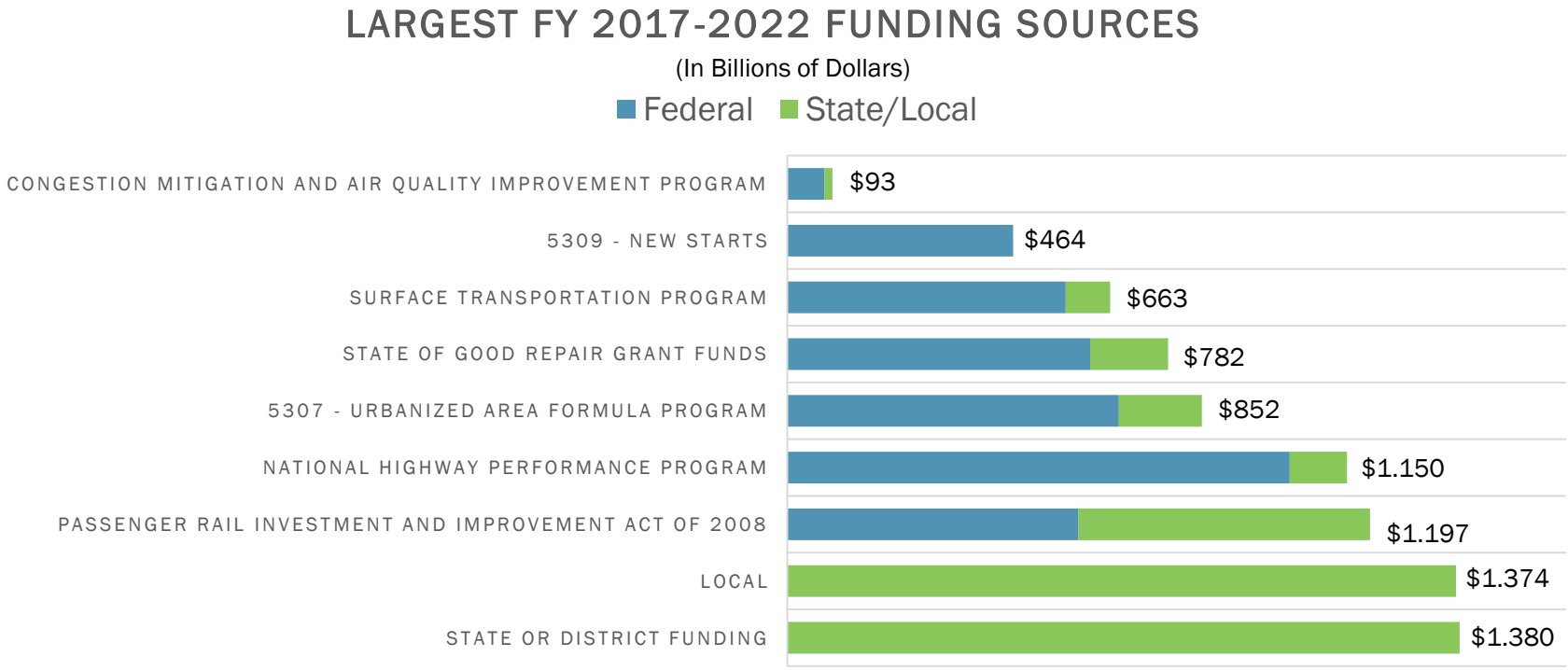
- Proposal submitted to WMATA Board in December 2016
- Public hearing and outreach opportunities January – February 2017
- Will be submitted to TPB as an amendment to the FY 2017-2022 TIP in Spring 2017

TPB Development of FY 2017-2022 TIP

- Schedule
  - December 2015: Call for Projects
  - January 2015: Projects submitted for Air Quality Conformity Analysis
  - February 11 – March 12, 2016: Public comment period
  - May – September: Programming data for TIP projects submitted
  - Release for public comment on October 13, 2016 with CLRP amendment
  - Approval November 16, 2016
- Amended FY 2015-2020 TIP rolled over to FY 2017-2022
- Current draft and approved TIP are “snapshots” of a constantly changing document
  - Major amendments from DDOT, VDOT and WMATA expected in 2017

Review of the Draft FY 2017-2022 TIP

- $9 billion programmed between FY 2017 and FY 2022
  - $4.7 billion is federal funding (53%)
  - 90% of funding from nine sources



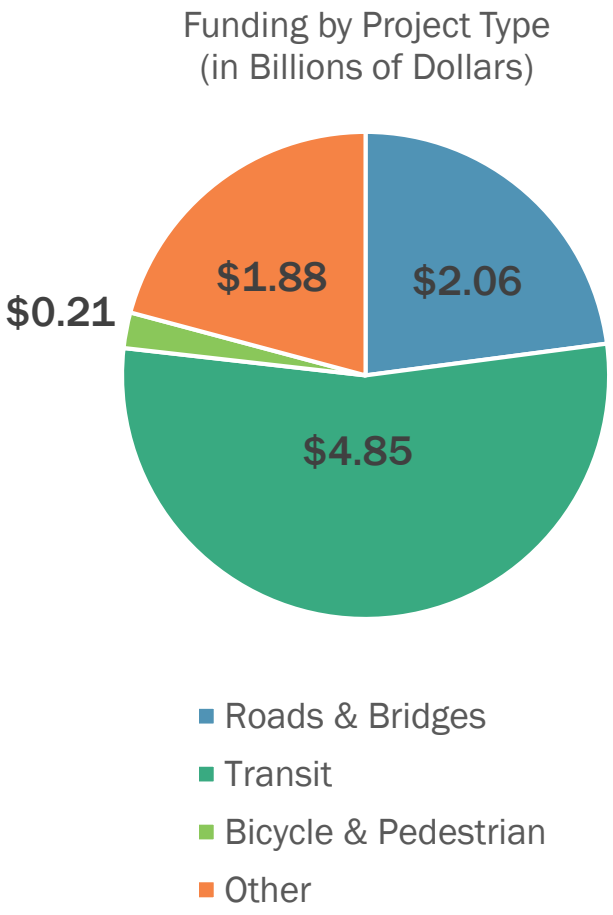
Review of the Draft FY 2017-2022 TIP

Over 300 Projects

- Capital and Operations & Maintenance projects
- 112 road & bridge
- 57 transit
- 44 bicycle & pedestrian
- Other: ITS, Safety, Freight, Maintenance & Rehabilitation

FY 2017-2022 Programmed Amounts

- 18 projects over $100 million
- 235 projects $20 million or less



Sample Projects in the FY 2017-2022 TIP

District of Columbia	TIP ID
• South Capitol Street Corridor/Bridge - **$339 million**	3423
• Union Station to Georgetown/K Street Transit - **$143 million**	5755
Maryland	
• Purple Line - **$788 million**	2795
• I-95/I-495 Interchange at Greenbelt Metro - **$161 million**	2894
• MD 4/Suitland Parkway Interchange - **$102 million**	3547
Virginia	
• I-66 Multimodal Improvement inside Beltway - **$45 million**	6512, 6513
• Silver Line Phase II - **$50 million**	4272, 6362

Next Steps for the FY 2017-2022 TIP

- Release for 30-day public comment period along with CLRP
  October 13 – November 12, 2016
- Web-based interactive GIS mapping
- Enhanced search capabilities
  - Funding sources
  - Project locations
  - Grouping of projects by construction, maintenance, safety, etc.

Question & Answer Session

REGIONAL PLANNERS AND STATE OFFICIALS

District of Columbia

- Mark Rawlings, DDOT

Maryland

- Kari Snyder, MDOT

Virginia

- Norman Whitaker, VDOT
- Cina Debastini, VDOT

Metro

- Allison Davis, WMATA

Andrew Austin

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Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002

ITEM 10 – Information
September 21, 2016

Briefing on Mitigation Actions and Experiences
From WMATA's SafeTrack Surge Activities

Staff Recommendation: Receive briefing

Issues: None

Background: The board will be briefed on experiences and mitigation actions taken by local jurisdictions and WMATA at locations that have recently undergone significant safety and maintenance work as part of WMATA's SafeTrack work plan.

National Capital Region
Transportation Planning Board

MEMORANDUM

TO: Transportation Planning Board
FROM: Eric Randall, TPB Transportation Engineer
SUBJECT: Recent TPB and COG Activities in support of the WMATA SafeTrack Plan
DATE: September 15, 2016

This memorandum provides an overview of recent TPB and COG activities in support of the WMATA SafeTrack safety surges. The board was previously updated at its June and July meetings, focusing on initial experiences and mitigation actions for the first few surges.

Surge #9 (Vienna – West Falls Church) began on September 15. A new SafeTrack schedule was published on September 14 for Surges #10 (NoMa – Fort Totten) and #11 (East Falls Church – West Falls Church). A new schedule will be published in December for the remaining four surges, #11 through #15, with the last surge now extending into April 2017.

COMMUTER CONNECTIONS UPDATE

The Commuter Connections SafeTrack Work Group held conference call meetings on July 28th, August 2nd, 15th, and September 7th. Each meeting was held just prior to an upcoming SafeTrack Surge and allowed meeting participants to exchange information on TDM strategies being used along with lessons learned from previous Surges.

The Commuter Connections SafeTrack web site was updated throughout the summer months with new links added and can be accessed from the Commuter Connections home page at http://www.commuterconnections.org

Approximately 25,000 Geo-targeted messages to employers and employees surrounding the impacted Metrorail stations for Surges #5 - 8 were developed and sent. The purpose of the e-mailed messages was to provide alternative commuting information and options to commuters affected by the SafeTrack Surges and for employers to disseminate the information to their respective employees. Social media outreach continued for Surges #4 - 8 along with public service announcements, and paid radio advertisements.

New Ridesharing applications to Commuter Connections climbed 14% during the months of July and August compared to the same time last year.

COG PUBLIC OUTREACH

COG's Office of Communications continues to coordinate monthly conference calls for the public information officers in the region whose jurisdictions are affected by WMATA's SafeTrack work. The most recent calls were held on July 25 to discuss track work on the Red Line for Surges #6 and# 7, on August 17 regarding Surge #8 on the Yellow and Blue Lines, and on September 12 to discuss Surges #9 and #10 on the Orange Line.

The calls help Metro officials coordinate outreach and messaging activities for each of the surges. After each call, the Office of Communications distributes the latest flyers and signage Metro has developed to inform the public.

REGIONAL ACTIVITIES

Briefings and discussions of SafeTrack have taken place at recent meetings of the TPB Technical Committee. Aside from regional coordination discussion, traffic analysis of the impacts of the SafeTrack surges is being conducted by TPB staff.

The Metropolitan Area Transportation Operations Coordination (MATOC) Program has hosted Transit Task Force teleconferences, most recently on August 1, to share information on actions and impacts from the surges and transit activities.

TRANSPORTATION AGENCY INFORMATION

Agencies in the region are implementing a number of mitigation measures to provide transportation alternatives during the SafeTrack safety surges, including:

- Additional bus/shuttle service on routes in or near the surge work zones;
- Expanded rush hour parking restrictions along primary commuter and bus routes;
- Traffic signal re-timing and additional traffic control officers;
- Additional Capital Bikeshare bikes and stations, along with a new payment option;
- Bike convoys with guides;
- Promotion of carpooling, telework and flexible work options.

WMATA has also had customer service agents positioned in the impacted Metro stations guiding customers to alternative modes of travel and hosts "pop-up" events at some of the key impacted stations for each surge.

WMATA has also prepared summary reports of the work completed during each surge; attached are reports on the work completed during Surges #4 through #7.

Specific actions by jurisdictions or transportation agencies can be found on their websites:

City of Alexandria	https://www.alexandriava.gov/SafeTrack
Arlington County	https://topics.arlingtonva.us/safetrack/
District of Columbia	http://safetrack.godcgo.com/
Fairfax County	http://www.fairfaxcounty.gov/safetrack/

Montgomery County

http://gomontgomery.blogspot.com/2016/06/safetrack-to-affect-montgomery-county.html

Prince George's County

http://www.princegeorgescountymd.gov/2509/SafeTrack

Virginia Railway Express (VRE)	http://www.vre.org/service/safetrack-information/
WMATA	https://wmata.com/rail/safetrack.cfm

Metro News Release

For immediate release: September 14, 2016

SHARE PRINT

Metro announces SafeTrack surge dates for remainder of 2016

Metro today announced revised dates for the remaining SafeTrack surges of this calendar year. The new dates follow changes to the SafeTrack schedule announced in mid-August to address new safety recommendations, incorporate interlockings, and account for the impact of record heat and humidity during the summer months

As previously announced, Surge #9 will begin tomorrow and run for 42 days through October 26. On weekdays, Orange Line will single track at all times between Vienna and West Falls Church. Trains will service Vienna and Dunn Loring stations every 24 minutes. Service from West Falls Church to New Carrollton will be unaffected. On weekends, rail service will be suspended. For details, please see the. Service Advisory

The following SafeTrack surge dates were announced today:

Surge #10: NoMa-Gallaudet-Fort Totten | October 29 - November 22

- **Date change:** This surge will now begin on Saturday, October 29, and continue through Tuesday, November 22.
- **Service info:** Red Line rail service will not operate between Fort Totten and NoMa-Gallaudet stations during this surge. As a result, two stations-Brookland and Rhode Island Avenue-will be closed. Buses will operate between Fort Totten, Brookland, Rhode Island Ave and NoMa. However, customers are encouraged to use the Green Line as an alternate route between Fort Totten and Downtown DC (Gallery Place). Red Line trains will operate less frequently than normal at all stations, and riders are encouraged to use alternate routes or travel outside of rush-hour periods if possible. More info

Surge #11: East Falls Church-West Falls Church | November 28 - December 21

- **Date change:** This surge will now begin on Monday, November 28, and continue through Wednesday, December 21.
- **Service info:** Trains will single track at all times between East Falls Church and West Falls Church stations, affecting both Orange and Silver line service. Trains will run every 16 minutes at all times, with heavy crowding expected during rush hour periods. Riders are encouraged to use alternate routes or travel outside of rush-hour periods if possible. More info

Updated SafeTrack schedule information for 2017 will be announced in December with specific start and end dates. However, Metro has revised the order of some surges to reduce weather impacts on above-ground work zones. The sequence of 2017 surges will be:

Early January	Braddock Road-Huntington Blue Line Yellow Line	Single tracking w/weekend shutdowns
Late January - Early February	Rosslyn-Pentagon Blue Line	Line segment shutdown
March	Braddock Road-Huntington Blue Line Yellow Line	Single tracking w/weekend shutdowns
Late March - April	Greenbelt-College Park Green Line	Single tracking w/weekend shutdowns

Metro and the Federal Transit Administration will continue to identify and address maintenance needs that will be incorporated into Metro's maintenance program. For more information about the SafeTrack program, service impacts and travel alternatives, visit wmata.com/safetrack.

SafeTrack is an accelerated track work plan to address safety recommendations and rehabilitate the Metrorail system to improve safety and reliability by significantly expanding maintenance time on weeknights, weekends and midday hours and includes more than a dozen "Safety Surges" - long duration track outages for major projects in key parts of the system. The overall objective of SafeTrack is to bring Metrorail tracks and structures into a state of good repair by eliminating safety hazards, increasing service reliability and improving the ride quality of the system.

News release issued at 2:52 pm, September 14, 2016.

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Metro News Releases | **News Room**

SafeTrack: Surge 4

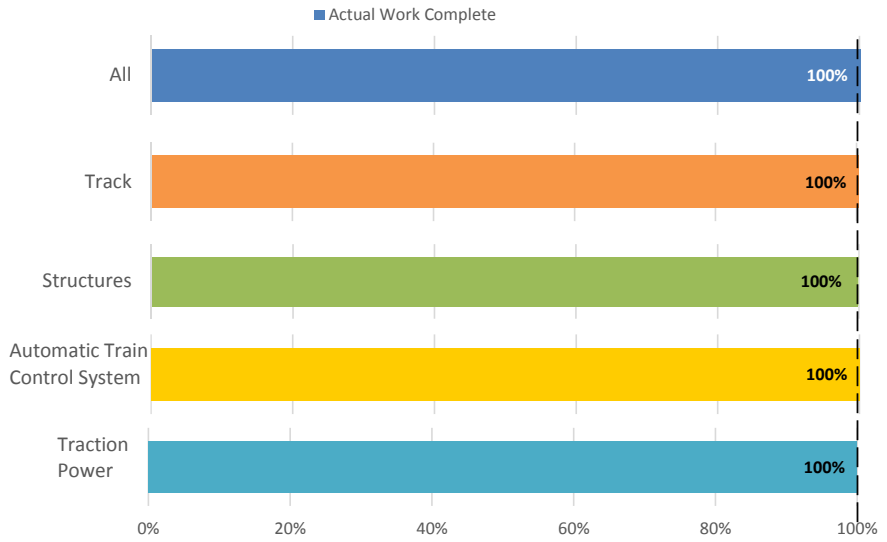
DATES:
July 12 - 18

WORK ZONE:
Pentagon City to Reagan National Airport, Line Segment Shutdown (Crystal City Station Closed)

Final Report
Data as of 07/21/16

SCOPE OF WORK: Renewal of rail and power infrastructure on this portion of the Blue and Yellow lines, including rail, fasteners, grout pads, and power cables.

Overall Progress (% Planned Work Complete)



Notes:

*Surge #4 results are preliminary and subject to quality control processes which will remain continuous throughout the duration of SafeTrack. Any remediation work that is identified will be accomplished during normal maintenance times.

Actual work complete represents the % complete across all tasks.

Surge 4 concluded on July 18, 2016 with all critical tasks completed. During the surge, priority was given to addressing potential defects and repairing or replacing critical rail infrastructure that affects train speeds and ride quality. Additional regular and preventive maintenance activities were fit in as time permitted. These maintenance activities are and will continue to be conducted on a regular basis to keep the infrastructure in a state of good repair.

Most of the work zone was in tunnels, where rail is affixed to grout pads with fasteners and studs. As a result, there was much less crosstie and insulator renewal scheduled, and work crews were more shielded from hot temperatures.

The critical tasks completed during the surge include:
+ Welded 26 joints on the rail, improving ride quality and safety
+ Replaced over 2700 linear feet of rail
+ Renewed over 950 linear feet of grout pad
+ Replaced over 2400 fasteners and 1500 studs, some of which were original components
+ Cleaned and repaired tunnel drainage system to help prevent water damage to new components

Shutting down this segment of the Blue and Yellow line allowed the necessary repairs to be completed much more quickly than would otherwise be possible. Replacing over 2400 fasteners would take about 80 nights if performed only after the system closed, or 7 weekends of single-tracking. Replacing 950 feet of grout pads would take two full weekends of single-tracking.

In addition, crews completed preventive maintenance activities, including inspecting and repairing lighting in tunnels and cables at traction power substations and breakers.

Safe**Track**: Surge 4 Detailed Report

Final Report: 7/21/2016

	Task	unit	Completed During Surge
Track	Crosstie renewal	# crossties	81
	Insulator replacement	# insulators	31
	Fastener renewal	# fasteners	2,463
	Stud renewal	# studs	1,572
	Third Rail maintenance	# linear feet cover board	310
	Spot Rail renewal	# linear feet	2,730
	Joint elimination	# joints welded	26
Structures	Grout Pad renewal	# linear feet grout pad	959
	Drain maintenance	# grates/baskets	28
	Track Bed cleaning	# linear feet	3,200
Automatic Train Control System	Track Junction Box repair/replacement	# boxes	38
Traction Power System	Power Cable repair/replacement	# cables	54
	Tunnel Light repair/relamp	# units	178

Safe**Track**: Surge 5

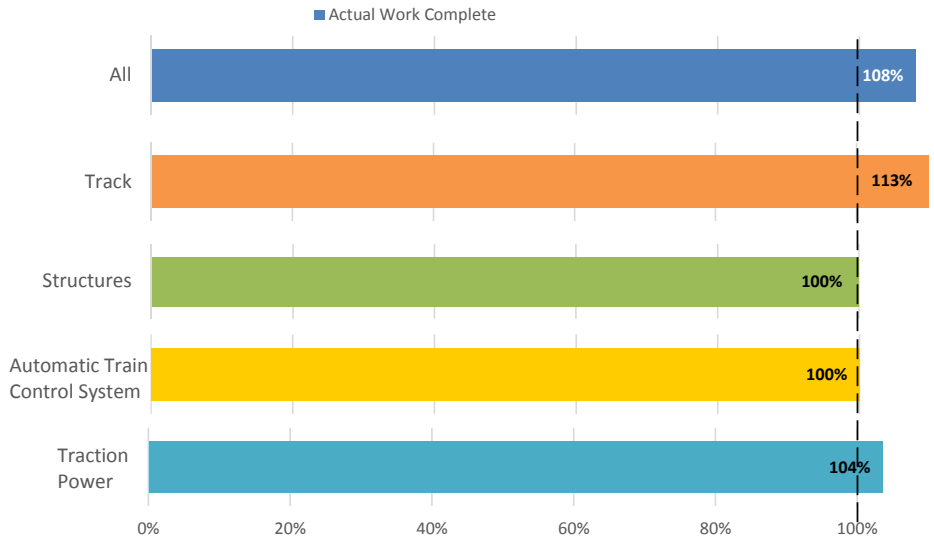
DATES:
July 20 - 31

WORK ZONE:
Ballston to East Falls Church, Continuous Single Tracking

Final Report
Data as of 08/05/16

SCOPE OF WORK: Renewal of rail and power infrastructure on this portion of the Orange and Silver lines, including crossties, fasteners, and power cables.

Overall Progress (% Planned Work Complete)



Notes:

*Surge #5 results are preliminary and subject to quality control processes which will remain continuous throughout the duration of SafeTrack. Any remediation work that is identified will be accomplished during normal maintenance times.

Actual work complete represents the % complete across all tasks.

Surge 5 concluded on July 31, 2016 with all critical tasks completed. During the surge, priority was given to addressing potential defects and repairing or replacing critical rail infrastructure that affects train speeds and ride quality. Additional regular and preventive maintenance activities were fit in as time permitted. These maintenance activities are and will continue to be conducted on a regular basis to keep the infrastructure in a state of good repair.

Lessons learned from dealing with the heat during Surge 3 were successfully applied to this effort. For example, crosstie replacement crews conducted multiple passes through an area in order to prevent the rail from kinking. Crews were able to complete all planned track work ahead of schedule, giving them time to replace 4,680 linear feet of rail and an additional 450 crossties, work which had been planned for a later date. In addition, power crews were able to repair an additional set of expansion cables

The critical tasks completed during the surge include:
+ Welded 24 joints on the rail, improving ride quality and safety
+ Replaced over 1400 crossties
+ Replaced over 4600 linear feet of rail
+ Replaced over 2300 fasteners and almost 500 studs, some of which were original components
+ Repaired over 75 power cables

Shutting down this segment of the Orange and Silver lines allowed the necessary repairs to be completed much more quickly than would otherwise be possible. Replacing over 2300 fasteners would take about 79 nights if performed only after the system closed. Replacing 4,600 linear feet of rail would take two weekends of single-tracking.

In addition, crews completed preventive maintenance activities, including inspecting and repairing lighting in tunnels and over 12,400 linear feet of fiberoptic cables.

Safe**Track**: Surge 5 Detailed Report

Final Report: 8/5/2016

	Task	unit	Completed During Surge
Track	Crosstie renewal	# crossties	1,405
	Insulator replacement	# insulators	121
	Fastener renewal	# fasteners	2,369
	Stud renewal	# studs	495
	Third Rail maintenance	# linear feet cover board	820
	Rail renewal	# linear feet	4,680
	Joint elimination	# joints welded	24
Structures	Track Bed cleaning	# linear feet	5,110
Automatic Train Control System	Track Junction Box repair/replacement	# boxes	17
Traction Power System	Power Cable repair/replacement	# cables	79
	Tunnel Light repair/relamp	# units	242

SafeTrack: Surge 6

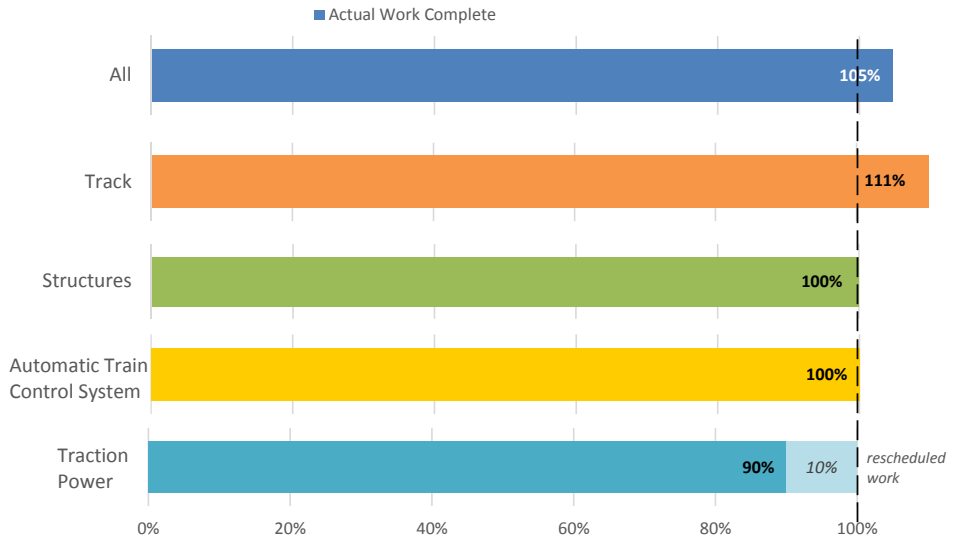
DATES:
August 1 - 7

WORK ZONE:
Takoma to Silver Spring, Continuous Single Tracking

Final Report
Data as of 08/11/16

SCOPE OF WORK: Renewal of rail and power infrastructure on this portion of the Red line, including crossties, insulators, and power cables.

Overall Progress (% Planned Work Complete)



Notes:

*Surge #6 results are preliminary and subject to quality control processes which will remain continuous throughout the duration of SafeTrack. Any remediation work that is identified will be accomplished during normal maintenance times.

Actual work complete represents the % complete across all tasks.

Surge 6 concluded on August 7, 2016. All tasks were completed except for the replacement of one set of power expansion cables. This work will be conducted after the system closes at night, since power must be removed from both tracks.

During the surge, priority was given to addressing potential defects and repairing or replacing critical rail infrastructure that affects train speeds and ride quality. Additional regular and preventive maintenance activities were fit in as time permitted. These maintenance activities are and will continue to be conducted on a regular basis to keep the infrastructure in a state of good repair.

The critical tasks completed during the surge include:
+ Replaced over 1300 crossties, several hundred more than originally planned and about 35 percent of all ties in the area
+ Replaced over 300 linear feet of rail and welded 14 joints
+ Replaced almost 500 insulators
+ Repaired 20 power cables
+ Repaired marker coils and D-loops that provide station stopping information and speed commands to trains
+ Removed vegetation and trash from over 8,100 feet of the track bed, improving drainage and eliminating fire hazards

Operating a continuous single track for seven days on this segment of the Red line allowed the necessary repairs to be completed much more quickly than would otherwise be possible. Replacing over 1300 crossties would take about 260 nights if performed only after the system closed.

In addition, crews completed preventive maintenance activities, such as inspecting and repairing platform edge lights and over 140 intrusion detection warning (IDW) boxes located along the fence line of the tracks.

Safe**Track**: Surge 6 Detailed Report

Final Report: 8/11/2016

	Task	unit	Completed During Surge
Track	Crosstie renewal	# crossties	1,311
	Insulator replacement	# insulators	496
	Tamping	# linear feet	9,240
	Third Rail maintenance	# linear feet cover board	1,280
	Rail renewal	# linear feet	312
	Joint elimination	# joints welded	14
Structures	Track Bed cleaning	# linear feet	8,129
Automatic Train Control System	Marker Coil and D-Loop junction box repair/replacement	# items	4
Traction Power System	Power Cable repair/replacement	# cables	20

Safe**Track**: Surge 7

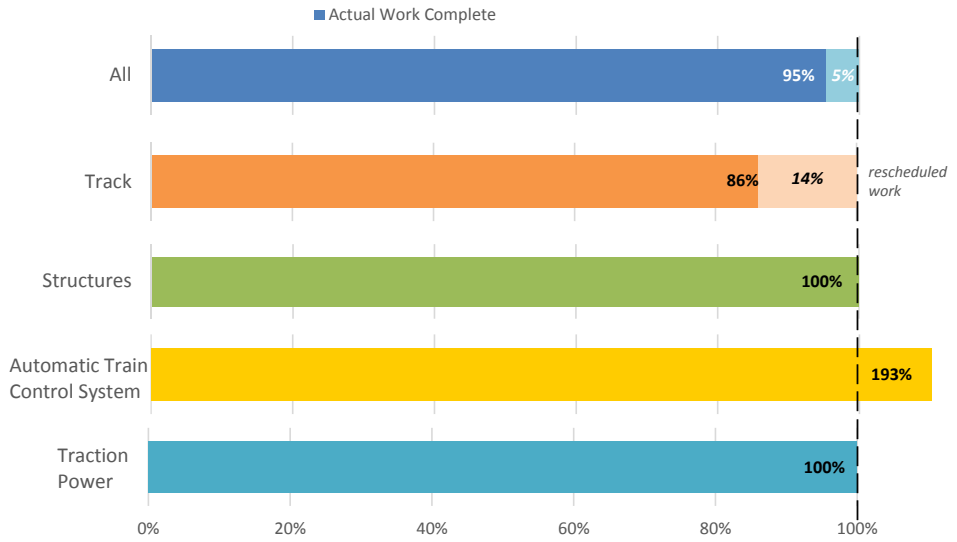
Final Report
Data as of 08/30/16

DATES:
August 9-21

WORK ZONE:
Shady Grove to Twinbrook, Continuous Single Tracking (with Full Shutdown August 13-14, August 20-21)

SCOPE OF WORK: Renewal of rail and power infrastructure on this portion of the Red line, including crossties, track circuit equipment, and power cables.

Overall Progress (% Planned Work Complete)



Notes:

*Surge #7 results are preliminary and subject to quality control processes which will remain continuous throughout the duration of SafeTrack. Any remediation work that is identified will be accomplished during normal maintenance times.

Actual work complete represents the % complete across all tasks.

Surge 7 concluded on August 21, 2016 with most planned tasks complete. During the surge, priority was given to addressing potential defects and repairing or replacing critical rail infrastructure that affects train speeds and ride quality. Additional regular and preventive maintenance activities were fit in as time permitted. These maintenance activities are and will continue to be conducted on a regular basis to keep the infrastructure in a state of good repair.

The main focus of the work was to replace deteriorating crossties in this area. The surge was originally scheduled to end August 18th, but was extended through the 21st to allow for additional work on two key crossover tracks, address new safety recommendations and account for the impact of extreme heat, humidity and electrical storms which slowed productivity. Due to these factors, track crews were unable to complete all tasks in the expanded scope and will return to the area to finish maintenance, including crossties, rail renewal and welding.

The surge included two weekend shutdowns, which allowed crews to make repairs on both sets of tracks. These weekend shutdowns enabled crews working on Automatic Train Control systems to complete additional repairs, including refurbishing four times as many Track Junction boxes as originally planned and converting 12 signals to LED lights.

The critical tasks completed during the surge include:
+ Replaced over 3,500 crossties, about 35 percent of crossties in this area
+ Welded 6 joints
+ Replaced over 1,100 insulators
+ Repaired 72 power cables, 4 damaged orange boots and 36 pigtails
+ Repaired 19 track junction boxes and over 60 Intrusion Detection Warning System boxes, important safety features along fence lines
+ Removed vegetation and trash from over 1,600 feet of the track bed, improving drainage and eliminating fire hazards

Limiting service for 13 days on this segment of the Red line allowed the necessary repairs to be completed much more quickly than would otherwise be possible. Replacing over 3500 crossties would take over 2 years if performed only after the system closed.

Safe**Track**: Surge 7 Detailed Report

Final Report: 8/30/2016

	Task	unit	Completed During Surge
Track	Crosstie renewal	# crossties	3,572
	Insulator replacement	# insulators	1,120
	Ballast renewal	# tons	140
	Tamping	# linear feet	25,300
	Third Rail maintenance	# linear feet cover board	2,000
	Joint elimination	# joints welded	6
Structures	Track Bed cleaning	# linear feet	1,692
Automatic Train Control System	Intrusion Detection Warning System (IDW) refurbishment and replacement	# boxes	62
	Track Junction Box refurbishment	# boxes	19
	Signal conversion to LED lighting	# signals	12
Traction Power System	Power Cable repair/replacement	# cables	72

ITEM 11 – Information
September 21, 2016

Briefing on Federal Planning Regulations

Staff Recommendation: Receive briefing

Issues: None

Background: The board will be briefed on formal comments submitted by TPB to the United States Department of Transportation (US DOT) in response to proposed rulemaking for Metropolitan Planning Organization Coordination and Planning Area Reform. In addition, the board will be briefed on upcoming requirements for setting targets for transit asset management by the region's providers of public transportation and for the metropolitan planning area.

National Capital Region
Transportation Planning Board

MEMORANDUM

TO: Transportation Planning Board

FROM: Kanti Srikanth, TPB Staff Director

SUBJECT: Update on Federal Planning Regulations

DATE: September 15, 2016

This memorandum provides an update for the board on recent federal rulemaking on the proposed changes to the metropolitan planning area and coordination process.

MPO COORDINATION AND PLANNING AREA REFORM PROPOSED RULE

A Notice of Proposed Rulemaking (NPRM) for Metropolitan Planning Organization Coordination and Planning Area Reform[1] was published June 27, 2016. The proposed rule would revise transportation planning regulations to "promote more effective regional planning by States and metropolitan planning organizations (MPO)".

Proposed requirements in the NPRM include:

- Metropolitan Planning Area (MPA) boundaries must include the entire Urbanized Area (UZA) and contiguous area expected to become urbanized within 20 years, with an exception for multiple MPOs in a single MPA if size and complexity make multiple MPOs appropriate.
- In MPAs where more than one MPO is designated, those MPOs within the MPA shall (1) jointly develop a single metropolitan transportation plan (e.g., CLRP); (2) jointly develop a single transportation improvement program (TIP) for the MPA; (3) jointly establish the performance targets for the MPA to address the new federal performance-based planning and programming (PBPP) requirements; and (4) agree to a process for making a single conformity determination on the joint plan.
- Metropolitan planning agreements would have to be updated among other things to include coordination strategies[2] and dispute resolution procedures between the States and the MPOs and between adjacent MPOs.

The TPB was notified about the publication of the proposed rule and the due date for comments during its July 20, 2016 meeting.

Comments on the NPRM were due by August 26. Attached is the TPB's comment letter, which focused on three chief concerns and/or reasons why the this NPRM should 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.

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[1] https://www.gpo.gov/fdsys/pkg/FR-2016-06-27/pdf/2016-14854.pdf

[2] The proposed rule would require rather than encourage the use of coordinated data collection, analysis and planning assumptions across the MPA.

- Conducting metropolitan planning over more expansive areas would lead to less efficient and less effective planning and decisionmaking.
- Coordination between adjacent or affected MPOs is already occurring. Existing planning rules and practices do not preclude further efforts to strengthen such coordination.

Over 500 comments were submitted to the federal docket, overwhelmingly in favor of withdrawing or significantly scaling back this proposed rulemaking. Included as attachments are comments submitted by the Virginia and Maryland Departments 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.

<u>The TPB considers this to be the most onerous and impracticable change to the metropolitan planning process.</u> 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.

- **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.

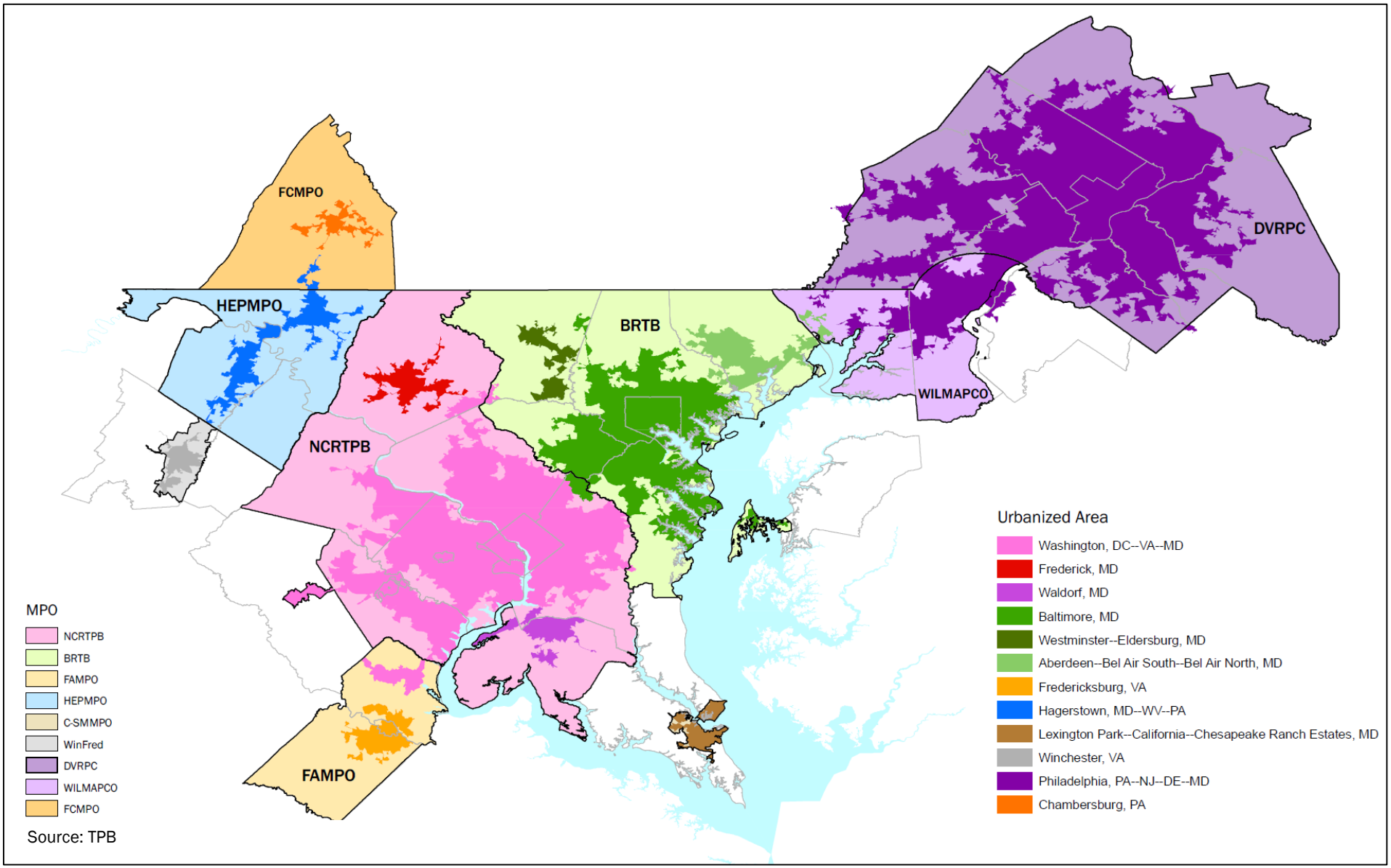
If you have any questions or would like to discuss this matter further, please contact TPB Staff Director Kanti Srikanth at ksrikanth@mwcog.org or (202) 962-3257.

Sincerely,

Timothy Lovain

Tim Lovain
TPB Chairman

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



Maryland Department of Transportation
The Secretary's Office

Larry Hogan
Governor

Boyd K. Rutherford
Lt. Governor

Pete K. Rahn
Secretary

August 26, 2016

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

Ms. Carolyn Flowers
Acting Administrator
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington DC 20590

Dear Administrator Nadeau and Acting Administrator Flowers:

The Maryland Department of Transportation (MDOT) is pleased to submit comments on the Federal Highway Administration's (FHWA) and Federal Transit Administration's (FTA) "Metropolitan Planning Organization (MPO) Coordination and Planning Area Reform: Proposed Rule FHWA 2016-0016," published in the Federal Register on June 27, 2016.

The MDOT strongly opposes the proposed rule and respectfully requests that it be withdrawn for the reasons outlined in this letter. As a member of the American Association of State Highway and Transportation Officials (AASHTO), MDOT agrees with the docket comments provided by AASHTO with respect to the proposed rulemaking. The MDOT also concurs with the comments submitted by a number of the MPOs in Maryland, including those from the Baltimore Regional Transportation Board (BRTB), National Capital Region Transportation Planning Board (TPB), and Wilmington Area Planning Council (WILMPACO).

It appears that the U.S. Department of Transportation (USDOT) perceives that the transportation planning process, as it pertains to MPO coordination and boundaries, is not working. The MDOT's experience in this regard contradicts this perception. All seven MPOs in Maryland, five of which are multi-state MPOs, are already engaged in a planning process that fully includes and clearly defines the census-designated Urbanized Areas (UZAs) and Metropolitan Planning Areas (MPAs) through formal agreements. The proposed rule creates unnecessary complexity and adds no value to an already successful and comprehensive process in Maryland. It is unclear if implementing this rule would stand up to a legal challenge. In addition, implementing of this rule could create legal issues across state lines, particularly concerning fiscal constraint since the short-term Transportation Improvement Program (TIP) budgets must have both state legislature and gubernatorial approvals. The unintended consequences that could result from this proposed rule are far-reaching and more time should be dedicated to coordinating with the states and MPOs to determine the best way to address the perceived problems that USDOT has identified.

Maryland MPOs Already Engage in an Active Coordination Process

The proposed rule offers an overly generalized solution to the perceived problem of "a lack of coordination" that many states and MPOs, including Maryland, are not experiencing. The MDOT is already accomplishing the goals of regional coordination and cooperation between the MPOs and adjacent states, which share urbanized areas to satisfy current federal standards.

Maryland has seven MPOs, five of which are multi-state MPOs (see Attachment 1 for a description of Maryland MPOs and a corresponding map). Three of the five multi-state MPOs are Transportation Management Areas (TMAs) with populations exceeding 200,000. The MDOT maintains official agreements, which clearly identify where the MPA and UZAs overlap and which MPO is responsible for planning for each specific population. In addition, MDOT hosts a bi-annual meeting with all Maryland MPOs to engage staff and federal partners in improved coordination. Maryland MPO members often attend each other's meetings throughout the year on various overlapping topics, such as maintaining the travel model and developing the cooperative forecast.

The planning processes in which Maryland participates have been successful in meeting federal regulations, as evidenced in the continued approvals of the TMA Certifications for TPB, BRTB, and WILMAPCO, which includes Maryland's Cecil County. Another example of Maryland's regional coordination process is that the BRTB contains not only the Baltimore UZA, but the Westminster and Aberdeen UZAs as well. Similarly, the TPB contains the primary Washington UZA, which stretches into Maryland (MD), Virginia (VA), and the District of Columbia (DC), as well as the Frederick and Waldorf UZAs. The Westminster, Aberdeen, Frederick, and Waldorf UZAs could have each designated their own separate MPOs, but in an effort to improve regional coordination, they chose to be included in the regional transportation planning body that would provide the greatest benefit to the region.

The MDOT actively engages MPO Board/Council members outside of the MPO process in many ways, one of which is through the annual Consolidated Transportation Program Tour. The Tour is a series of meetings held each Fall to coordinate transportation issues and review the proposed transportation budget with each of Maryland's 24 primary local jurisdictions. This budget informs the development of the MPO TIPs and the Maryland Statewide Transportation Improvement Program (STIP). The proposed rule offers no "value added" to MDOT's existing and extensive coordination process.

Proposed Rule Creates Unnecessary Complexity

The current obstacles in coordination will multiply when they are applied to implementing this rule concerning funding coordination and developing one regional transportation plan, TIP, conformity determination, and set of performance targets. The largest issue is the complexity involved in implementing the rule as written. Even if MPOs choose not to merge or re-designate their boundaries, the referenced planning products would still be required to be identical and coordinated.

Each MPO has evolved to meet the needs of the region it currently serves. There is flexibility in MPO structure, which has allowed vastly different regions to designate and form these organizations to best suit their areas. The individual MPO Board/Council structures will determine the effectiveness of this new rule, should it become final. At best, implementing this rule will be challenging to explain to the Board/Council members who must individually vote to implement these changes.

Local elected officials who serve on MPO Boards/Councils ***are not transportation specialists***. Maryland MPO Board/Council members spend as few as ten hours to as many as 30 to 50 hours ***per year*** on transportation planning issues, which is a very small amount of time considering the amount of time spent by staff to prepare documents and plans for boards to approve. This rule suggests and assumes that board members are willing to spend additional time on actions that may be implemented hundreds of miles away from the citizens that they represent. When an MPA or MPO grows to be too large in size, issues that are important to the State and local elected officials can get diluted across large geographic areas, further complicating an already complex process and making it impossible to think regionally but act locally.

Should this rule become final, merging MPOs would be a time-consuming, complex, and costly process, even if voluntary. The forced creation of a planning process to develop unified planning products would also be difficult, particularly so for Maryland's five multi-state MPOs, and redesignation or merging would require the agreement of as many as four governors and the Mayor of the District of Columbia to proceed.

The potential merging of MPOs will also marginalize the smaller local jurisdictions and smaller states associated with multi-state MPOs, thereby creating the potential for critical infrastructure improvements to be hindered by inter-state bureaucracy via the MPO approval process. This could result in potentially significant delays and additional costs to the delivery of safety and system preservation projects.

In addition, the states bordering Maryland are not all on the same legislative or budgetary schedule. The project ranking and funding mechanisms are also different. ***Joint planning products that require five states, their governors, their legislatures, and state agencies coordinating on the same schedule would be virtually impossible to implement.*** The number of TIP and STIP amendments and modifications that would need to be processed would dramatically increase, creating more work for states, MPOs, and our federal partners than had the MPOs remained separate. Delays in funding and project delivery will inevitably occur as a result.

There appear to be many inconsistencies between the stated goals in USDOT's explanatory paragraph of the NPRM's purpose and the manner in which it has been presented to stakeholders. While many of these goals appear to be non-controversial on the surface, the likelihood of complications and added layers of bureaucracy seem to be in conflict with wanting to "give MPOs a stronger voice in the regional planning process" and "improve regional coordination." If the U.S. Census becomes the primary mechanism for establishing MPO boundaries, regardless of current governmental structure, that means decision-making authority would be taken away from local jurisdictions, the states, and their governors by not allowing them to establish their MPO boundaries. This undermines a state's ability to determine how the metropolitan planning process will be coordinated. It also dilutes local jurisdictional influence in the MPOs as their stature diminishes and the states become larger forces on the MPOs. In multi-state MPOs, the majority of the coordination tends to happen between the states not the local jurisdictions.

This rule implies that it is a simple or brief process to adjust the MPA to match the UZA. When UZAs do not align with state or local governmental authority, the result is confusion and a lack of ownership over regional authority. For example, MDOT was unable to meet the federal deadline to designate the Calvert-St. Mary's MPO, the most recent MPO established in Maryland, due to the fact that there were no clearly defined local elected officials that represented the small UZA (population 58,875). It took several years of intensive coordination to fully establish this small MPO.

Regardless of size or complexity, this new rule would affect 142 out of the 409 MPOs nationally, and it lacks a practical approach to implementing the required changes of either merging, redrawing boundaries, or coordinating combined planning products over large and diverse areas so soon before the next census is taken.

The proposed rule does not address how the census determines UZAs or a way that states could challenge or alter UZAs. States should have the authority to be able to adjust UZA boundaries, question the logic that develops the UZA boundaries, and establish reasonable MPOs.

The proposed rule acknowledges that there will be an initial expense in the merging of MPOs, but suggest that there could be long-term savings. While this may be true for single state MPOs, the additional travel and time requirements for newly formed and additions to existing multi-state MPOs will be an additional expense for the local board members. Although the time spent is reimbursable, the time that is taken away from their other priorities is a cost that has not been calculated.

Potential Legal Concerns

The potential for legal challenges and inter-state conflicts arising from the proposed rule could place jurisdictions in conflict with existing and superseding statutes. To the extent the proposed rule would force redesignations in some instances without local concurrence, the regulation would violate 23 USC §134 (d) (4) and (5), the MPO designation and redesignation clauses under which MPO designations remain in effect until a redesignation occurs. Redesignation requires the agreement between the governor and local governments that together represent at least 75 percent of the existing planning area population. The proposed rule is in conflict with the language of the existing statute.

Neither the statutory language nor the regulatory interpretation has changed in over 20 years. The statutory authorization for this new interpretation does not appear in the Fixing America's Service Transportation (FAST) Act. The USDOT should have sought Congressional approval through legislation to enact the aforementioned goals.

The methodology and metrics used to assess urbanized areas and planning area boundaries changed drastically between the 2000 census and 2010 census. Without knowing the measures and procedures that will be adopted for developing the 2020 census, it would be sheer guesswork to predict "the contiguous area expected to become urbanized within the 20-year forecast period" with any degree of accuracy.

Inter-state conflicts could also arise if multiple MPOs in Maryland must have a single metropolitan transportation plan (MTP), TIP, conformity determination, and set of performance targets. Since the set of contiguous urbanized areas in the northeastern United States runs from the District of Columbia area to Massachusetts, the cascading effect of coordination requirements is a daunting proposition. While this approach might make sense for smaller MPAs, it is counter-productive when applied to multi-city mega-regions like the northeastern United States and California.

Unintended Consequences and Suggested Changes to the NPRM

The MDOT is concerned that insufficient time has been allotted to evaluating the consequences of the proposed rule. The rule could have many unintended consequences that could negatively affect the regional planning process and detract from the locally-developed and unique approaches that each region has created and refined over many years in conducting regional planning and coordination activities. MPOs traditionally have different rules based on their size and while consolidation by some MPOs might achieve the desired results for the USDOT, there are definitely unintended consequences that will hurt MPOs, local jurisdictions, and smaller states if this rule is implemented as written. One size does not fit all.

The MDOT's general concerns and suggestions for improving the NPRM are as follows:

- The proposed rule does not acknowledge any jurisdiction below the state level. States are made up of counties, cities, and towns. The census looks at block groups, or census tracts, and does not take the smaller jurisdictions' boundaries into consideration. The MPAs/UZAs break smaller state jurisdictions in two and may place them in separate UZAs. In general, governors might not be opposed to the consolidation of smaller MPOs within an individual state but it should be on a voluntary and cooperative basis. Local jurisdictions, on the other hand, would generally be opposed to it as larger MPOs may make local jurisdictions much smaller players. This goes against the original intent of the establishment of MPOs, which is to give local jurisdictions a voice in regional planning and a platform to voice their concerns and priorities.

- Shared boundaries between two UZAs should not be a determining test of contiguousness. Two adjacent urbanized areas should remain two different MPOs. The Washington and Baltimore UZAs share a border at the City of Laurel. These two UZAs have different characteristics and needs and should remain as separate UZAs and MPOs.

If USDOT proceeds to finalize the proposed rule despite widespread opposition, MDOT respectfully offers the following suggestions:

- The proposed rule should be a voluntary request that a state's governor would consider.

- The proposed consolidations should not create MPO mega-regions where already large MPOs (over 1,000,000 in population) are forced to merge. In place of a combined regional transportation plan, TIP, performance targets, and funding consolidation, adjacent regions could develop one over-arching policy document that all MPOs in the mega-region could agree to follow.

- There should be an exemption from the requirements of the proposed rule if the amount of population contained in a UZA that overlaps into a different MPA is less than ten percent of the total population in an MPO.

- Traditionally, MDOT staff has "smoothed" census-designated UZA boundaries to create FHWA-approved adjusted UZAs, taking into account future growth areas. The MDOT suggest that the ability to continue to "smooth" UZAs be retained so that they may continue to follow jurisdictional boundaries.

- The primary issue behind the proposed rule appears to be the existence of multiple MPOs within one MPA, whether wholly within a state or crossing state lines. The following are several examples of how complicated this process could become in Maryland if implemented:

    1. The Philadelphia MPA extends into portions of Cecil County, Maryland, which is under the planning auspices of WILMAPCO. Under the proposed rule, the governors of the respective states in the Philadelphia MPA would be required to designate multiple MPOs within the single MPA, maintaining the existing MPOs. Regardless of individual MPOs continuing to exist, however, they would now be required to jointly produce a single MTP and a single TIP. In effect, this would place MDOT projects in portions of Cecil County within a Philadelphia TIP. How exactly this would work is yet to be determined. The proposed rule says "the MPOs would be required to establish procedures for joint decision-making." Whether the existing MPOs would still be free to amend their portions of the MTP and TIP or whether a joint-MPO committee would need to approve amendments is unclear. Conversely, the governors could conceivably consolidate the existing MPOs so that only one MPO served the Philadelphia MPA. The MDOT supports keeping the current structure intact, since it works well and WILMAPCO is a highly functioning MPO.

    2. The Aberdeen-Bel Air South-Bel Air North MPA is another example of multiple MPOs existing within one MPA. This MPA extends across the Susquehanna River, covering Aberdeen and Bel Air in Harford County and Port Deposit and Perryville in Cecil County. The proposed rulemaking would ideally see the entire MPA under one MPO. Currently, the Cecil County portion of this MPA is served by WILMAPCO through an agreement. As with the above example, were the two MPOs to remain in place, BRTB and WILMAPCO now would be required to jointly produce a single MTP and single TIP for the Aberdeen MPA, whether in conjunction with the Philadelphia and/or Baltimore MPAs or as an individual Aberdeen MPA.

    3. Further to the south, the BRTB (Baltimore) shares populations with TPB (Washington), which also shares populations with the Fredericksburg (VA) Area MPO (FAMPO). This could then in turn mean that there would be one MTP, TIP, etc., from Fredericksburg, VA all the way to Philadelphia, PA This is simply not an implementable framework or structure.

- If, as the proposed rule states, "when there are multiple MPOs within the same MPA, enhanced coordination and joint decision-making procedures are needed to ensure a coordinated and comprehensive planning process within the MPA," what is the advantage of designating multiple MPOs within an MPA? While the intent may be a more "local" level of governance, the reality is that it adds is another layer of bureaucracy.

- It will be crucial to determine if all MPOs will need to be redesignated following any changes to their geography based upon the proposed rule. Who would make that final determination?

- The proposed rule states the new regulations will "ensure States and MPOs employ consistent data, assumptions, and analytical materials when doing transportation planning." It is unclear the effect such regulations might have on performance measures/targets with respect to state DOTs and MPOs.

- The proposed rule includes a two-year phase-in period from the time of the final rule's publication. The MDOT proposes pushing this timeline back to coincide with the next decennial census and subsequent MPA designations.

- States needs to be given the opportunity to coordinate with the U.S. Census Bureau in designating UZA boundaries to consider more factors than covered by the census and adjust boundaries to correspond to political, geographic, and demographic realities. The census is not a transportation-determining authority and should not have the authority to dictate how transportation planning is coordinated. The information and data provided by the census is used as an important tool to inform the process, stakeholders, and jurisdictions involved. It should not be the sole determining factor in establishing MPAs, UZAs, and MPOs.

In closing, USDOT has stated that the purpose of this rule is to improve the planning process, strengthen coordination, promote increased regional approaches to decision-making, elevate the importance of regionalism, ensure that investments reflect the needs of the entire region, recognize the critical role of MPOs, and strengthen the voice of MPOs. The MDOT has demonstrated that all of those important activities are already occurring.

Furthermore, as indicated in the MDOT Statewide Planning Findings and in the TPB, BRTB, and WILMAPCO TMA Certifications that have been approved by USDOT, Maryland's planning processes have been successful in meeting federal regulations. MDOT fails to see how the proposed rule will add value to an already comprehensive, well-documented, and inclusive process.

The MDOT appreciates the opportunity to provide comments and respectfully suggests that there are other methods to address the perceived issues that USDOT has identified as hindering the regional transportation planning process, other than through the proposed rulemaking.

If you have any additional questions or concerns, please contact Ms. Heather Murphy, MDOT Office of Planning and Capital Programming Director, at 410-865-1275, toll free at 1-888-713-1414, or via email at hmurphy@mdot.state.md.us. Ms. Murphy will be happy to assist you.

Sincerely,

Pete K. Rahn
Secretary

Attachment

cc: Ms. Heather Murphy, Director, Office of Planning and Capital Programming, MDOT

Attachment 1

The following background information has been provided to offer insight into Maryland's complex planning environment, specifically related to overlapping urbanized areas, existing MPO and MPA boundaries, and regional and inter-state coordination.

Existing Maryland MPOs and their total UZA population:

- Baltimore Regional Transportation Board (BRTB), population 2,430,686
- Cumberland Area MPO (CAMPO)*, population 49,619
- Calvert-St. Mary's MPO (C-SMMPO), population 58,875
- Hagerstown-Eastern Panhandle MPO (HEPMPO)*, population 173,193
- National Capital Region Transportation Planning Board (TPB)*, population 4,818,779
- Salisbury/Wicomico Area MPO (S/WMPO)*, population 98,081
- Wilmington Area Planning Council (WILMAPCO)*, population 540,164

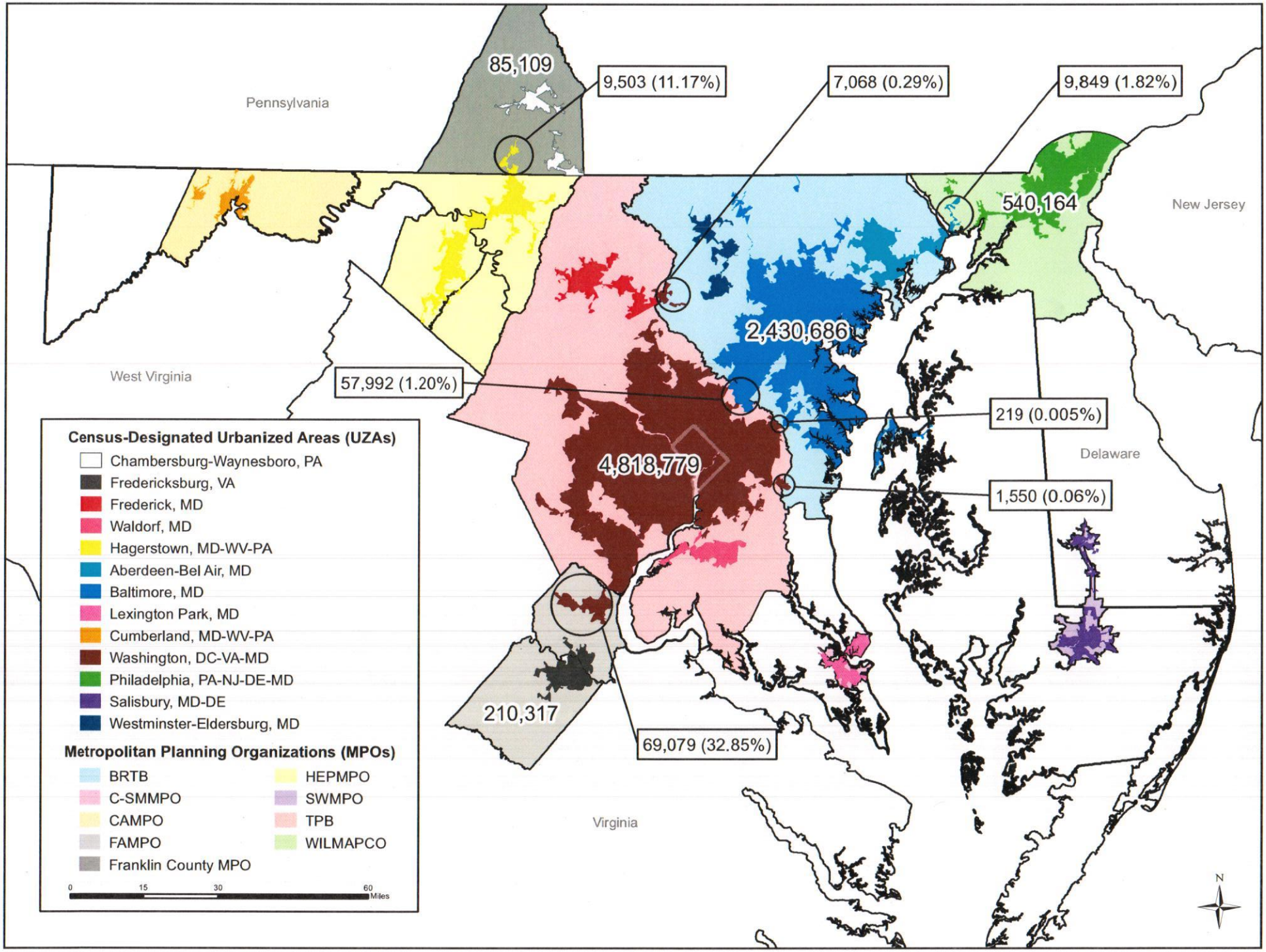
** MPOs whose boundaries extend into adjacent states (PA, DE, VA, WV, and DC)*

Existing Maryland-adjusted UZAs/MPAs include:

- **Aberdeen-Bel Air South-Bel Air North**, MD (Harford County portion of MPA under agreement with BRTB; Cecil County portion of MPA under agreement with WILMAPCO)
- **Baltimore****, MD (Anne Arundel, Baltimore, Carroll, Howard, and Queen Anne's County portions of MPA and Baltimore City under agreement with BRTB; Montgomery and Prince George's County portions of MPA under agreement with TPB)
- **Cumberland**, MD-WV-PA (MPA under agreement with CAMPO)
- **Frederick**, MD (MPA under agreement with TPB)
- **Hagerstown**, MD-WV-PA (MPA under agreement with HEPMPO)
- **Lexington Park-California-Chesapeake Ranch Estates**, MD (MPA under agreement with C-SMMPO)
- **Philadelphia****, PA-NJ-DE-MD (Cecil County portion of MPA under agreement with WILMAPCO)
- **Salisbury**, MD-DE (MPA under agreement with S/WMPO)
- **Waldorf**, MD (MPA under agreement with TPB)
- **Washington****, DC-VA-MD (Frederick, Montgomery, and Prince George's County portions of MPA under agreement with TPB; Anne Arundel, Carroll, and Howard County portions of MPA under agreement with BRTB)
- **Westminster-Eldersburg**, MD (MPA under agreement with BRTB)

*** A TMA by virtue of 200,000+ population*

Maryland MPOs and Urbanized Areas (2010 Census)



COMMONWEALTH of VIRGINIA

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

Charles A. Kilpatrick, P.E.
Commissioner

August 26, 2016

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

Carolyn Flowers
Acting Administrator, Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

RE: Notice of Proposed Rulemaking; Metropolitan Planning Organization Coordination and Planning Area Reform
Docket No. FHWA–2016-0016; FHWA RIN 2125–AF68; FTA RIN 2132–AB28

Dear Administrator Nadeau and Acting Administrator Flowers:

The Virginia Department of Transportation (VDOT) and Virginia Department of Rail and Public Transportation (DRPT) jointly offer the following comments in response to the Federal Highway Administration/Federal Transit Administration/Department of Transportation June 27, 2016 Federal Register Notice of Proposed Rulemaking and Request for Comments: Metropolitan Planning Organization (MPO) Coordination and Planning Area Reform.

General Overview/Response

As noted in the Summary section of the NPRM, this regulatory "action proposes to improve the transportation planning process by strengthening the coordination of MPOs and States and promoting the use of regional approaches to planning and decisionmaking. The proposed rule would emphasize the importance of applying a regional perspective during the planning process, to ensure that transportation investments reflect the needs and priorities of an entire region. Recognizing the critical role MPOs play in providing for the well-being of a region, this proposed rule would strengthen the voice of MPOs in the transportation planning process."

While the stated purpose of the NPRM is laudable, due to the significant number of other related regulatory changes and the complexity of the potential implementation of the proposed rule, VDOT and DRPT request that the rulemaking be either withdrawn or postponed, and a working group established to study the issue.

VDOT and DRPT would note that the impacts of the regulatory changes proposed by this rulemaking are extremely difficult to assess, in light of the recent Statewide, Nonmetropolitan, and Metropolitan Transportation Planning Final Rule recently issued on May 27, 2016, as well as the several federal transportation performance management-related rulemakings that are in various stages of promulgation.

VDOT and DRPT are concerned about unintended consequences given state agency responsibility for the implementation and reporting requirements associated with the various new planning and performance related rulemakings and the interplay between the functions of MPOs and state agencies in complying with various aspects of the proposed rules. Most notably, unintended consequences could include significant delays in project delivery, increased project costs, and delayed or hindered implementation of the new rules.

VDOT and DRPT would, notwithstanding the recent rulemakings, also highlight one scenario to illustrate the proposed rule's impact on current day planning processes and project delivery in Virginia. Based on our interpretation, the proposed rule would result either in establishment of a mega MPO from Caroline County in Virginia to Philadelphia, Pennsylvania (and potentially beyond Philadelphia), or at least would require single consolidated planning documents and conformity determinations for the multiple MPOs contained within that area. Creating collaborative documents for the multiple MPOs or consolidation of the MPOs as a mega MPO will add significant time, logistical challenges, complexities, effort and cost to the project development process. A significant hurdle would be to simply educate expanded or multiple MPO boards, stakeholders and the public on potentially unfamiliar projects that are outside of their normal planning areas, and on the newly created coordination process to secure approvals for said projects in plans and programs.

As stated above, given the complexities involved with assessing the impact of the proposed changes under this NPRM, VDOT and DRPT would propose that FHWA, FTA and USDOT withdraw or postpone this rulemaking and instead establish a working group or a similar body to study the potential issues and the objectives that may have prompted the proposed changes to current-day regulations under this NPRM.

In closing, VDOT and DRPT appreciate the opportunity to provide comments on this proposed rule. If you have any questions, do not hesitate to contact either of us at the email addresses or telephone numbers below.

Sincerely,

Charles A. Kilpatrick, P.E.
Commissioner of Highways
Virginia Department of Transportation
Charlie.Kilpatrick@vdot.virginia.gov
804-786-2701

Jennifer Mitchell
Director
Department of Rail and Public Transportation
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804-371-4866

MPO COORDINATION AND PLANNING AREA REFORM

Update on Recent Proposed Federal Rulemaking and TPB Comments

Kanti Srikanth
TPB Staff Director

Transportation Planning Board
September 21, 2016

Agenda Item 11

National Capital Region
Transportation Planning Board

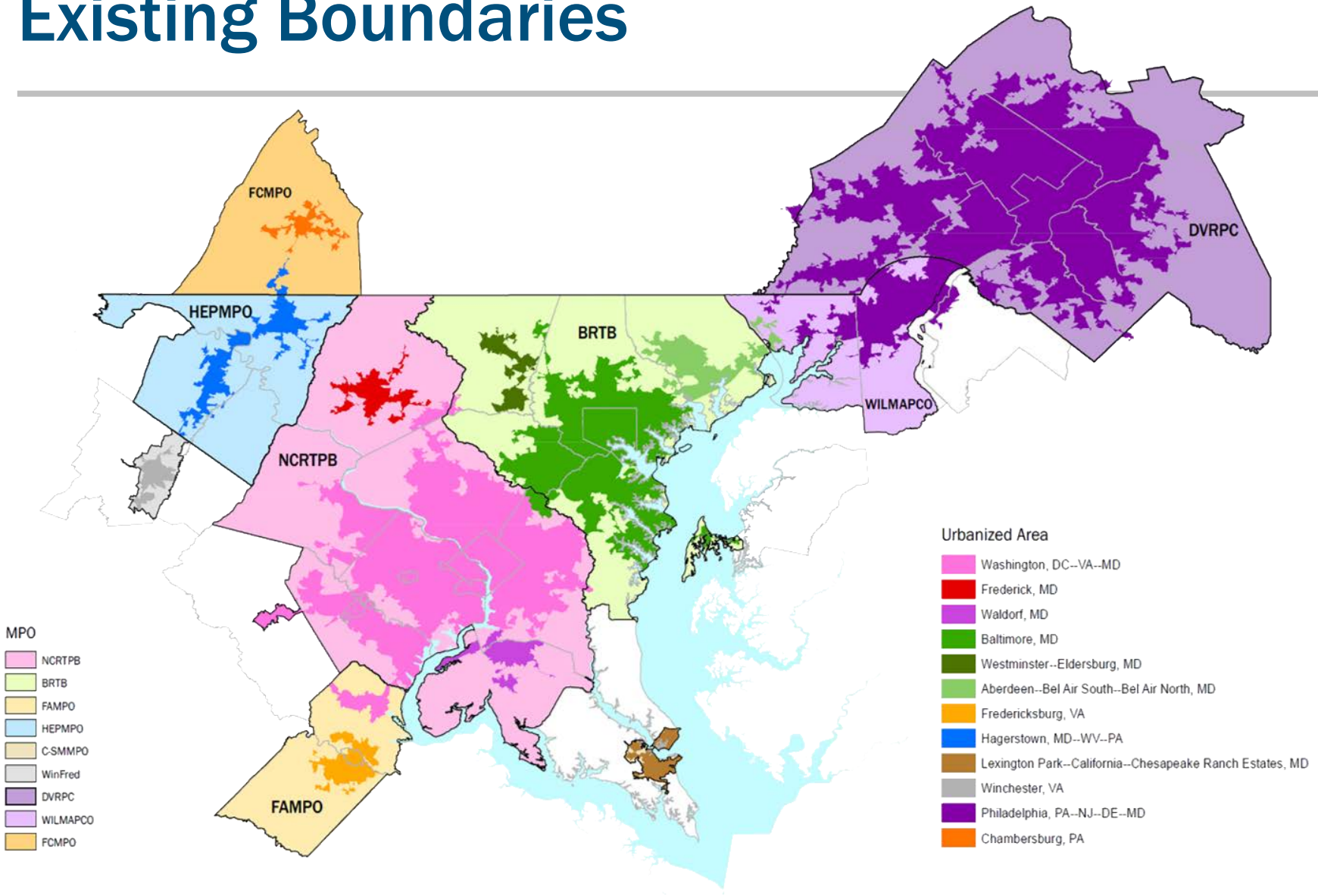
What's Happening

- **FHWA and FTA jointly proposing revisions to the metropolitan planning rules that affect the planning areas and the coordination activities of MPOs**
- Proposed rulemaking published June 27, 2016
  - Comments were due August 26 and submitted by TPB
- Stated intent of the proposed rules:
  - Strengthen coordination between MPOs and States
  - Promote regional approaches to transportation planning and decision making
  - Emphasize importance of regional perspective
  - Ensure transportation investments reflect regional needs and priorities
  - Strengthen voice of MPOs in the transportation planning process

How It Would Affect Planning Areas

- **Would revise the definition of Metropolitan Planning Areas (MPA)**
- Would require the MPA, at a minimum, to include the entire Urbanized Area and the contiguous area expected to become urbanized within a 20-year forecast period
- A single MPO would conduct the metropolitan planning activities for an MPA (as defined above) UNLESS
- The Governor(s) (and Mayor) and the affected MPOs make an exception and establish multiple MPOs
  - Basis for exception: Determination that the size and complexity of the MPA merits multiple MPOs

Existing Boundaries



How It Would Affect Planning Products

Even if an exception is granted:

- **All MPOs in a Metropolitan Planning Area (MPA) would be required to jointly prepare, for the entire MPA:**
  - A single metropolitan transportation plan (i.e., CLRP)
  - A single transportation improvement program (TIP)
  - A single air quality conformity analysis on the joint plan (CLRP)
  - A single set of performance targets (6 topic areas)

How It Would Affect Planning Processes

Even if an exception is granted:

- **AND, all MPOs would be required to establish agreements to:**
  - Identify areas of coordination and division of planning responsibilities for the MPA
  - A process for joint decision making
  - Procedures for resolution of any disagreements
  - Coordinate data collection, analysis, and planning assumptions

TPB Comments

- **We support the stated intent of the proposed rule**
- **But we respectfully urge USDOT to withdraw the proposed changes**
  - Extremely challenging if not impracticable to implement
  - Will hinder not advance regional approaches and perspectives into regional planning
  - Disrupts long standing existing "3C" process (Continuing, Comprehensive, Cooperative)
  - Existing rule does not preclude actions to advance the stated intent

Key Recommendation: *USDOT should work with individual MPOs and States to remedy specific instances in which a lack of coordination might be hindering the transportation planning process.*

What Happens Next

- **USDOT reviews comments**
- **USDOT takes one of the following actions:**
  - Withdraws proposed rulemaking
  - Takes time to collaborate and make changes before issuing a final, revised rule
  - Makes changes and issues a final, revised rule
  - Issues final rule without changes from proposed rule
- **Rule becomes effective 30 days after finalization**
- **All requirements to be complied with within 2 years of effective date**

Kanti Srikanth

TPB Staff Director
(202) 962-3257
ksrikanth@mwcog.org

mwcog.org/tpb

Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002

National Capital Region
Transportation Planning Board

MEMORANDUM

TO: Transportation Planning Board

FROM: Eric Randall, TPB Transportation Engineer

SUBJECT: Update on Federal Planning Regulations

DATE: September 15, 2016

This memorandum provides an update for the board on recent activities in the federal performance-based planning and programming (PBPP) rulemaking and the requirements set forth in the new Statewide and Metropolitan Planning Rule, focusing on the new rule for transit asset management.

TRANSIT ASSET MANAGEMENT RULE

As part of the federal PBPP rulemaking, the final Transit Asset Management rule was published in the Federal Register on July 26, 2016, and becomes effective October 1, 2016.[1] Transit asset management (TAM) is ''a strategic and systematic process of operating, maintaining, and improving public transportation capital assets effectively through the life cycle of such assets.''

Under the final TAM rule, transit providers must collect and report data for four performance measures, covering equipment, rolling stock, infrastructure, and facility condition. For these measures, transit providers will have to set targets for the upcoming fiscal year, develop a four-year TAM plan for managing capital assets, and use a decision support tool and analytical process to develop a prioritized list of investments. This rule applies to all recipients and subrecipients of Federal transit funds (e.g., Section 53XX funds) that own, operate, or manage capital assets used in the provision of public transportation and would require accounting for all assets used in the provision of public transportation service, regardless of funding source, and whether used by the recipient or subrecipient directly, or leased by a third party. A one-page summary is attached.

Upcoming requirements include:

- Transit providers must establish performance targets for FY 2018 by January 1, 2017.
- Transit providers must report data and targets by January 30, 2017 in the National Transit Database.
- TPB adopts transit asset targets for the metropolitan region within 180 days (i.e., by June 30, 2017).
- Transit providers must develop four-year TAM Plans by October 2018.

The TPB Regional Public Transportation Subcommittee has discussed this rulemaking, and TPB staff will be following up with a formal request for coordination with all transit providers. In addition to WMATA and PRTC/VRE, it appears that this requirement applies to every county and city in the region that operates public transportation with the exception of Loudoun County.

[1] https://www.gpo.gov/fdsys/pkg/FR-2016-07-26/pdf/2016-16883.pdf

PERFORMANCE-BASED PLANNING AND PROGRAMMING (PBPP) ACTIVITIES

TPB staff is continuing collaboration with DDOT, MDOT, and VDOT, as well as with WMATA and other providers of public transportation, for each PBPP performance area: Highway Safety, Highway and Bridge Condition, System Performance (Congestion, Freight, and CMAQ), Transit Safety and Transit Asset Management.

The federal agencies are expected to publish the final rule for Transit Safety in October and the final rule for Highway and Bridge Condition in November.

The TPB submitted formal comments on the proposed System Performance (Congestion, Freight, and CMAQ) rule on August 20.

In the next few months, TPB staff will be formally contacting the DOTs and the providers of public transportation to begin development of formal agreements on appropriate responsibilities for the performance based planning and programming (PBPP) data collection and target-setting process, as required under the new Statewide and Metropolitan Planning Rule.

FEDERAL TRANSIT ADMINISTRATION

Transit Asset Management
Final Rule Fact Sheet

The Moving Ahead for Progress in the 21st Century Act (MAP-21) required the Secretary to develop rules to establish a system to monitor and manage public transportation assets to improve safety and increase reliability and performance, and to establish performance measures, and the Fixing America's Surface Transportation (FAST) Act reaffirmed this requirement. On July 26, 2016, FTA published the Transit Asset Management (TAM) Final Rule. You may view the Final Rule at:

https://federalregister.gov/a/2016-16883

State of Good Repair

The purpose of the Final Rule is to help achieve and maintain a state of good repair (SGR) for the nation's public transportation assets. Transit asset management is a business model that uses transit asset condition to guide the optimal prioritization of funding. Currently, there is an estimated $85.9 billion transit SGR backlog.

The regulations apply to all Transit Providers that are recipients or subrecipients of Federal financial assistance under 49 U.S.C. Chapter 53 and own, operate, or manage transit capital assets used in the provision of public transportation.

State of Good Repair

The condition in which a capital asset is able to operate at a full level of performance. A capital asset is in a state of good repair when that asset:

1. Is able to perform its designed function,
2. Does not pose a known unacceptable safety risk, and
3. Its lifecycle investments must have been met or recovered.

TAM Plans

Tier I vs. Tier II Applicability

The Final Rule groups providers into two categories: Tier I and Tier II.

Tier I	Tier II
Operates rail **OR** > 100 vehicles across all fixed-route modes **OR** > 100 vehicles in one non-fixed route mode	Subrecipient of 5311 funds **OR** American Indian Tribe **OR** < 101 vehicles across all fixed route modes **OR** < 101 vehicles in one non-fixed route mode

TAM Plan Elements

The following graphic shows the TAM Plan elements that are required by each category of provider. Since Tier II providers generally operate less complex systems, their TAM Plan requirements are not as extensive.

1. Inventory of Capital Assets 2. Condition Assessment 3. Decision Support Tools 4. Investment Prioritization	Tier I & II
5. TAM and SGR Policy 6. Implementation Strategy 7. List of Key Annual Activities 8. Identification of Resources 9. Evaluation Plan	Tier I Only

Assets Included in Plan

It is expected that all assets used in the provision of public transit will be included in the TAM Plan asset inventory. This includes (with the exception of equipment) assets that are owned by a third party or shared resources. The inventory must include all service vehicles, and any other owned equipment assets over $50,000 in acquisition value. Agencies only need to include condition assessment for assets for which they have direct capital responsibility.

Plan Responsibility

Tier I providers must develop and carry out their own TAM plans. Tier II providers may develop their own plans or participate in a Group Plan, which is compiled by a Group Plan Sponsor (generally the State DOT or designated §5310 recipient). Tier II §5307 sub-recipients are not required to be offered a group plan, but may participate in one if a Sponsor invites them. Each Transit Provider must designate an Accountable Executive to ensure that the necessary resources are available to carry out the TAM plan and the Transit Agency Safety Plan, regardless of whether it develops its own TAM Plan or participates in a Group Plan.

Performance Management

Asset performance is measured by asset class, which means a subgroup of capital assets within an asset category. The following table shows the distinction between what assets must be included in asset inventories and the assets for which transit providers must measure performance.

Assets: *Only those for which agency has direct capital responsibility*	**Performance Measure**
Equipment Non-revenue support-service and maintenance vehicles	Percentage of vehicles met or exceeded Useful Life Benchmark
Rolling Stock Revenue vehicles by mode	Percentage of vehicles met or exceeded Useful Life Benchmark
Infrastructure Only rail fixed-guideway, track, signals and systems	Percentage of track segments with performance restrictions
Facilities Maintenance and administrative facilities; and passenger stations (buildings) and parking facilities	Percentage of assets with condition rating below 3.0 on FTA TERM Scale

Useful Life Benchmark

The expected lifecycle of a capital asset for a particular Transit Provider's operating environment, or the acceptable period of use in service for a particular Transit Provider's operating environment

Target Setting

Targets should be set by each transit provider or TAM plan sponsor for each applicable asset class for the coming year. Initial targets must be set by January 1, 2017 and then every fiscal year thereafter. It is recognized that Transit Providers may not have complete data while setting initial targets. To the extent feasible, targets should be supported by data such as the most recent condition data and reasonable financial projections for the future, but the overall end goal is to be in a system-wide SGR.

Timeframes/Reporting

TAM Plans

A TAM plan must be updated in its entirety at least every 4 years, and it must cover a horizon period of at least 4 years. An initial TAM plan must be completed no later than 2 years after the Final Rule effective date.

NTD

Each entity developing a TAM Plan will have to report annually to FTA's National Transit Database (NTD). This submission should include: (1) projected targets for the next fiscal year; (2) condition assessments and performance results; and (3) a narrative report on changes in transit system conditions and the progress toward achieving previous performance targets.

Additional Information

Mshadoni Smith (Mshadoni.Smith@dot.gov)

Final Rule Docket Number: FTA-2016-16883

https://www.transit.dot.gov/TAM

July 2016

UPDATE ON FEDERAL PLANNING REGULATIONS AND THE TRANSIT ASSET MANAGEMENT RULE

Eric Randall, TPB Transportation Engineer

Transportation Planning Board
September 21, 2016

Agenda Item 11

National Capital Region
Transportation Planning Board

Federal Planning Regulations

- Transit Asset Management (TAM) Final Rule
  - Coordination with MPO Planning
  - TAM Timeline
  - TAM – What is it?
  - Applicability to Regional Providers
  - TAM Performance Measures
  - Next Steps
- Comments on System Performance Measures NPRM (Congestion, Air Quality, and Freight)

Coordination of Transit Asset Management with Metropolitan Planning

- Final Transit Asset Management (TAM) rule published July 26, 2016.
- MPOs shall establish performance targets for transit asset management in coordination with transit providers, within 180 days of a transit provider setting targets.
- The Transportation Improvement Program (TIP) and the metropolitan transportation plan (i.e., TPB's CLRP) must consider programming of projects and how they affect performance.
    - Describe progress toward achieving targets in each update.
- MPO and the transit providers must jointly agree upon and document in writing the coordinated processes for collecting data and selecting and setting targets.

TAM Implementation – Timeline

- Statewide and Metropolitan Planning final rule published May 27, 2016
  - Framework for performance-based planning and programming (PBPP) process and statewide and MPO planning.
- The Transit Asset Management final rule was published in the Federal Register on July 26, 2016 and becomes effective October 1, 2016.
- Transit Providers (Accountable Executive) must establish performance targets for FY 2018 by January 1, 2017.
- Transit Providers must report data and targets by January 30, 2017 in National Transit Database (NTD).
- MPO (i.e., TPB) adopts transit asset targets for the metropolitan region within 180 days (i.e., by June 30, 2017).
- Transit Providers must establish four-year TAM Plans by October 2018.

Transit Asset Management – What is it?

- What is TAM? - ‘‘A strategic and systematic process of operating, maintaining, and improving public transportation capital assets effectively through the life cycle of such assets.’’
- Performance – Transit providers to collect and report data on four performance measures: equipment, rolling stock, infrastructure, and facilities.
- Targets – Annually, transit providers to set targets for the four performance measures for the upcoming fiscal year.
- TAM Plan – Four-year plan for managing capital assets, updated every four years.
- Decision support tools – Use of analytical process and tools to develop prioritized list of transit investments.

Applicability to Regional Providers

- Applies to all recipients and subrecipients of federal transit funds that own, operate, or manage capital assets used in the provision of public transportation.
  - Applies to regular, shared ride public transportation service.
  - Accounts for assets regardless of funding source, and whether used by the recipient or subrecipient or leased by a third party.
  - Two tiers of provider: Tier I if more than 100 vehicles in revenue service or operates rail; Tier II if 100 or fewer vehicles.

Tier I

1. WMATA: Metrorail, Metrobus, MetroAccess
2. DDOT: Streetcar, Circulator
3. Fairfax Connector
4. Montgomery County Ride On
5. PRTC OmniRide, OmniLink
6. Virginia Railway Express

Tier II

1. Arlington ART
2. MWCOG (taxi cos, Fairfax County Neighb. & Comm. Svcs.)
3. NVTC (Alexandria DASH)
4. Prince George's TheBus
5. MTA (Charles VanGo, Frederick TransIT)
6. Virginia DRPT (Virginia Regional Transit)

Transit Asset Performance Measures (Final)

	Performance Measure	Assets
Rolling stock (Age)	Percentage of revenue vehicles within a particular asset class that have met or exceeded useful life benchmark (ULB).	40 foot bus, 60 foot bus, vans, cutaways, locomotives, rail vehicles
Equipment - (non-revenue) service vehicles (Age)	Percentage of vehicles that have met or exceeded their (ULB).	Cranes, prime movers, vehicle lifts, tow trucks
Infrastructure-rail fixed-guideway track, signals, and systems (Condition)	The percentage of track segments, signal, and systems with performance restrictions.	Signal or relay house, interlockings, catenary, mechanical, electrical and IT systems
Stations/ Facilities (Condition)	The percentage of facilities, within an asset class, rated below 3 on the TERM scale.	Maintenance, Administration, Depots, Terminals, Parking Garages

Implementing TAM Rule - Next Steps

- Letters from TPB to transit providers asking for formal coordination on setting TAM targets, submission of data to TPB, and TPB establishment of TAM targets.
  - No prescribed way for MPOs to set targets: looking for further guidance from the Federal Transit Administration (FTA).

- Development of formal documentation on coordinated TAM process.
  - Planning rule requires this for all performance based planning and programming (PBPP) areas.

- TPB to set transit asset targets for the metropolitan area in the May 2017 timeframe.

Comments on System Performance Measures NPRM (Congestion, Air Quality, and Freight)

- Metropolitan Planning Area (MPA) vs. Urbanized Area
  - Use of MPA boundary is recommended as opposed to the use of Urbanized Area as specified in the NPRM
- Subpart F: § 490.611 (c) (2): Method to calculate Average Truck Speed
  - Harmonic Mean is recommended as opposed to Arithmetic Mean used in the NPRM
- Subpart F: § 490.613 (c): Threshold to determine (un)congested freight movement on Interstates
  - A percentage of posted speed limit is recommended as opposed to a fixed number – 50 mph as specified in the NPRM
- Subpart G: § 490.711 (c): Threshold to determine if excess delay occurs
  - A percentage of posted speed limit is recommended as opposed to fixed numbers – NPRM has 35 mph for freeways and 15 mph for non-freeways

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MPO COORDINATION AND PLANNING AREA REFORM

Update on Recent Proposed Federal Rulemaking and TPB Comments

Kanti Srikanth
TPB Staff Director

Transportation Planning Board
September 21, 2016

Agenda Item 11

National Capital Region
Transportation Planning Board

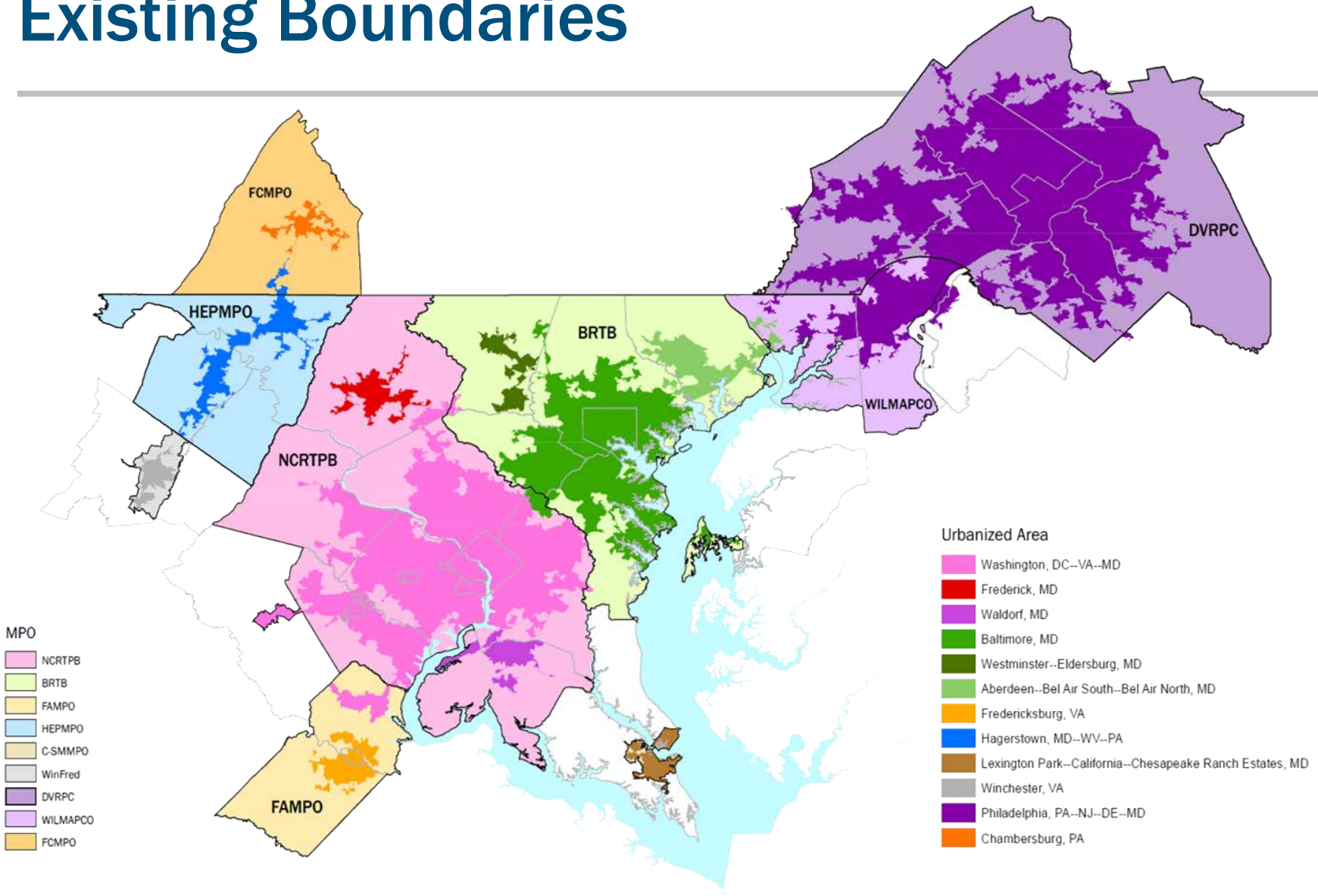
What's Happening

- **FHWA and FTA jointly proposing revisions to the metropolitan planning rules that affect the planning areas and the coordination activities of MPOs**
- Proposed rulemaking published June 27, 2016
  - Comments were due August 26 and submitted by TPB
- Stated intent of the proposed rules:
  - Strengthen coordination between MPOs and States
  - Promote regional approaches to transportation planning and decision making
  - Emphasize importance of regional perspective
  - Ensure transportation investments reflect regional needs and priorities
  - Strengthen voice of MPOs in the transportation planning process

How It Would Affect Planning Areas

- **Would revise the definition of Metropolitan Planning Areas (MPA)**
- Would require the MPA, at a minimum, to include the entire Urbanized Area and the contiguous area expected to become urbanized within a 20-year forecast period
- A single MPO would conduct the metropolitan planning activities for an MPA (as defined above) UNLESS
- The Governor(s) (and Mayor) and the affected MPOs make an exception and establish multiple MPOs
  - Basis for exception: Determination that the size and complexity of the MPA merits multiple MPOs

Existing Boundaries



How It Would Affect Planning Products

Even if an exception is granted:

- **All MPOs in a Metropolitan Planning Area (MPA) would be required to jointly prepare, for the entire MPA:**
  - A single metropolitan transportation plan (i.e., CLRP)
  - A single transportation improvement program (TIP)
  - A single air quality conformity analysis on the joint plan (CLRP)
  - A single set of performance targets (6 topic areas)

How It Would Affect Planning Processes

Even if an exception is granted:

- **AND, all MPOs would be required to establish agreements to:**
  - Identify areas of coordination and division of planning responsibilities for the MPA
  - A process for joint decision making
  - Procedures for resolution of any disagreements
  - Coordinate data collection, analysis, and planning assumptions

TPB Comments

- **We support the stated intent of the proposed rule**
- **But we respectfully urge USDOT to withdraw the proposed changes**
  - Extremely challenging if not impracticable to implement
  - Will hinder not advance regional approaches and perspectives into regional planning
  - Disrupts long standing existing "3C" process (Continuing, Comprehensive, Cooperative)
  - Existing rule does not preclude actions to advance the stated intent

Key Recommendation: *USDOT should work with individual MPOs and States to remedy specific instances in which a lack of coordination might be hindering the transportation planning process.*

What Happens Next

- **USDOT reviews comments**
- **USDOT takes one of the following actions:**
  - Withdraws proposed rulemaking
  - Takes time to collaborate and make changes before issuing a final, revised rule
  - Makes changes and issues a final, revised rule
  - Issues final rule without changes from proposed rule
- **Rule becomes effective 30 days after finalization**
- **All requirements to be complied with within 2 years of effective date**

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