

National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202

Item #5

MEMORANDUM

January 9, 2014

TO: Transportation Planning Board

FROM: Gerald K. Miller
Acting Co-Director, Department of
Transportation Planning

RE: Letters Sent/Received Since the December 18th TPB Meeting

The attached letters were sent/received since the December 18th TPB meeting. The letters will be reviewed under Agenda #5 of the January 15th TPB agenda.

Attachments

National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202

December 20, 2013

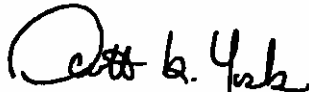
Roger Berliner
Chair, Climate, Energy and Environment Policy Committee (CEEPC)
777 North Capitol Street, NE, Suite 300
Washington, D.C., 20002

Dear Mr. Berliner,

The National Capital Region Transportation Planning Board (TPB) is supportive of regional efforts to monitor and contain Greenhouse Gas (GHG) air pollutants through area wide coordinated efforts. As part of this effort, TPB staff has been providing data and occasional technical assistance to local jurisdictions. The CEEPC action to develop Greenhouse Gas inventories for the jurisdictions in the National Capital region through a coordinated system of delivery is both pertinent and timely.

In support of this action, the TPB has agreed to develop year 2012 GHG emissions inventories from the on-road mobile sector by integrating this work element into an amendment of the FY2014 Unified Planning Work Program (UPWP), which was approved in November 2013. The work will be undertaken within the next month.

Sincerely,



Scott York
Chair, National Capital Region Transportation Planning Board

METROPOLITAN WASHINGTON  COUNCIL OF GOVERNMENTS

One Region Moving Forward

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Prince William County*

**Adjunct Member*

September 25, 2013

Scott York
Chair, National Capital Region Transportation Planning Board (TPB)
777 North Capitol St NE Suite 300
Washington, DC 20002

Dear Mr. York:

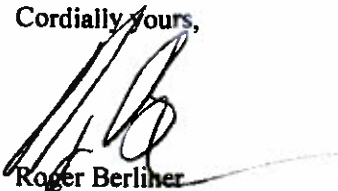
As you may be aware, the COG Board of Directors adopted targets for greenhouse gas reductions in the region for 2012, 2020, and 2050, as part of the 2008 NCR Climate Change Report. COG's Climate, Energy and Environment Policy Committee (CEEPC) has developed a set of action plan items through 2016 to reach the 2020 reduction goal. One of those action items is to develop community-level greenhouse gas inventories to assess progress in meeting our goals.

COG/DEP staff is currently working to develop an annual greenhouse gas inventory that is consistent across the region and that can be used by COG members for their planning efforts. In discussions with COG staff that support the TPB, we are aware that there is not currently a readily available emissions inventory for the transportation sector for 2012. We understand that COG staff are considering developing a new annual work activity to prepare such an inventory that could be used in the CEEPC progress report and emissions tracking efforts moving forward.

To that end, I am writing to formally request that TPB develop and provide an annual emissions inventory for the transportation sector that can be used to support the CEEPC climate and energy action plan goals to prepare community wide greenhouse gas emissions for all of the COG member governments. We are hopeful that this can be an activity that you will support on an annual basis as well.

We look forward to collaborating with you on this important new regional initiative.

Cordially yours,



Roger Berliner
Chair, Climate, Energy and Environment Policy Committee (CEEPC)

777 North Capitol Street, NE, Suite 300, Washington, D.C. 20002
202.962.3200 (Phone) 202.962.3201 (Fax) 202.962.3213 (TDD)

www.mwco.org

METROPOLITAN WASHINGTON  COUNCIL OF GOVERNMENTS

One Region Moving Forward

January 2, 2014

District of Columbia
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Loudoun County
Manassas
Manassas Park
Prince William County

**Adjunct Member*

Ms. Brigid Hynes-Cherin
Regional Administrator
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia PA 19103

Subject: MWCOG as Designated Recipient (DR) for MAP-21 Section 5310 Enhanced Mobility Program

Encl: (1) TPB Resolution R6-2013
(2) Letter, Commonwealth of Virginia, Secretary Sean Connaughton, April 2, 2013.
(3) Letter, State of Maryland, Governor Martin O'Malley, June 6, 2013
(4) Letter, District of Columbia, Mayor Vincent Gray, June 17, 2013.

This letter is to certify the identity of the Metropolitan Washington Council of Governments (MWCOG) to act as a Designated Recipient (DR) for the Section 5310 Enhanced Mobility Program for the Washington MD-DC-VA Urbanized Area, as designated by the Governors of Virginia and Maryland and the Mayor of the District of Columbia.

The National Capital Region Transportation Planning Board (TPB) is a federally designated Metropolitan Planning Organization (MPO) for the Washington MD-DC-VA Urbanized Area. As a MPO, the TPB is an eligible DR for the Section 5310 Enhanced Mobility Program. In its resolution R6-2013, the TPB sought approval to be a DR from the Governors of Virginia and Maryland and the Mayor of the District of Columbia, which was subsequently provided per the enclosed letters.

While the TPB is the designated recipient, the TPB is staffed by the Metropolitan Washington Council of Governments (MWCOG), which serves as the TPB's administrative agent as noted in the resolution. All contracts, grants, and other legal and fiduciary functions for the TPB are conducted by MWCOG. MWCOG is identified by the FTA as Metropolitan Planning Organization ID 1473. The Executive Director of MWCOG is the FTA-recognized Recipient Authorizing Official for the MPO.

Accordingly, MWCOG will conduct all administrative functions as a Designated Recipient (DR) for the Section 5310 Enhanced Mobility Program on behalf of the TPB, as described in the three enclosed letters.

777 North Capitol Street, NE, Suite 300, Washington, D.C. 20002
202.962.3200 (Phone) 202.962.3201 (Fax) 202.962.3213 (TDD)

www.mwcog.org

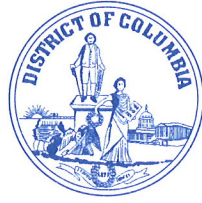
We look forward to working with you and your staff, both at Region III and in the DC Metro Office, in the new year as we commence the Section 5310 Program for the region.

Sincerely,

A handwritten signature in blue ink that reads "Chuck Bean". The signature is stylized and cursive.

Chuck Bean
Executive Director
Metropolitan Washington
Council of Governments

cc: Vida Morkunas, FTA Region III
Jay Fox, FTA Region III
Melissa Barlow, FTA DC Metro Office
Sharon Pandak, MWCOG
Gerald Miller, MWCOG



VINCENT C. GRAY
MAYOR

JUN 17 2013

Ms. Bridgid Hynes-Cherin
Regional Administrator
Federal Transit Administration, Region III
1760 Market Street
Philadelphia, PA 19103-4134

RE: Section 5310 Enhanced Mobility Program Regional Designation

Dear Administrator Hynes-Cherin:

In accordance with the Federal Transit Administration regulations under the Moving Ahead for Progress in the 21st Century (MAP-21) concerning the requirements for the designation of a recipient for the Section 5310 Enhanced Mobility Program (49 U.S. Code Section 5310) funds for the Washington DC-VA-MD Urbanized Area, I hereby designate the National Capital Region Transportation Planning Board (TPB) as the recipient of the Section 5310 Enhanced Mobility Program (49 U.S. Code Section 5310) for the Washington DC-MD-VA Urbanized Area. The TPB is staffed by the Metropolitan Washington Council of Governments (COG) which also serves as the TPB's administrative agent.

Should you have any questions concerning this designation, please contact Mr. Carl Jackson, Associate Director of the Progressive Transportation Services Administration in the District of Columbia Department of Transportation at (202)671-4617 or via email carl.jackson@dc.gov.

Sincerely,


Vincent Gray
Mayor

cc: Terry Bellamy, DDOT
Carl Jackson, DDOT
Ron Kirby, COG/TPB
Brian Glenn, FTA-DC Division Office

**STATE OF MARYLAND
OFFICE OF THE GOVERNOR**



**MARTIN O'MALLEY
GOVERNOR**

STATE HOUSE
100 STATE CIRCLE
ANNAPOLIS, MARYLAND 21401-1925
(410) 974-3901
(TOLL FREE) 1-800-811-8336

TTY USERS CALL VIA MD RELAY

June 6, 2013

Ms. Brigid Hynes-Cherin
Regional Administrator
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia PA 19103

Dear Ms. Hynes-Cherin:

In accordance with the Federal Transit Administration Regulations concerning the requirements for the designation of a recipient for Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities program, I hereby designate the National Capital Region Transportation Planning Board (TPB) the recipient of Section 5310 for the Washington DC-MD-VA Urbanized Area. The TPB is staffed by the Metropolitan Washington Council of Governments (COG), which also serves as the TPB's administrative agent.

The resolution of endorsement from the TPB is attached. Should you have any questions concerning this designation, please contact Ralign Wells, Maryland Transit Administrator, at 410-767-3943.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin O'Malley".

Governor

Attachments

cc: Mr. Darrell B. Mobley, Acting Secretary, Maryland Department of Transportation
Mr. Ralign T. Wells, Administrator, Maryland Transit Administration





COMMONWEALTH of VIRGINIA

Office of the Governor

Sean T. Connaughton
Secretary of Transportation

April 2, 2013

Brigid Hynes-Cherin
Regional Administrator – Region III
Federal Transit Administration
U.S. Department of Transportation
1760 Market Street
Suite 500
Philadelphia, PA 19103-4124

Dear Ms. Hynes-Cherin:

Due to changes in the Moving Ahead for Progress in the 21st Century Act (MAP-21), funding under FTA's Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program will now be apportioned directly to large urbanized areas. Based on the 2010 Census, the Washington DC-Virginia-Maryland urbanized area is still designated as a large urbanized area. Commonwealth of Virginia 2008 Executive Order 72 delegates the responsibility for designating Direct Recipients of FTA funds to the Secretary of Transportation. After consulting with the Virginia Department of Rail and Public Transportation, the National Capital Region Transportation Planning Board (TPB), and local transit agencies, I authorize the designation of the Metropolitan Washington Council of Governments as the Direct Recipient for FTA's Section 5310 funding apportioned to the Washington DC-Virginia-Maryland urbanized area. A copy of the TPB's letter requesting this action is enclosed for your review.

With this designation, it is my expectation that the Virginia Department of Rail and Public Transportation will continue to participate in the local metropolitan planning process and coordinate with TPB officials and transit operators to ensure proper documentation of projects eligible for Federal funding.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean T. Connaughton".

Sean T. Connaughton

Enclosures

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

**RESOLUTION TO AUTHORIZE THE TPB CHAIR TO SUBMIT
A FORMAL REQUEST TO THE GOVERNORS AND MAYOR THAT
THE METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS (COG), AS
THE ADMINISTRATIVE AGENT FOR THE TPB, SERVE AS THE DESIGNATED
RECIPIENT OF THE SECTION 5310 ENHANCED MOBILITY PROGRAM UNDER
THE MOVING AHEAD FOR PROGRESS IN THE 21ST CENTURY ACT**

WHEREAS, the National Capital Region Transportation Planning Board (TPB), the metropolitan planning organization (MPO) for the Washington Region, has the responsibility under the provisions of the Moving Ahead for Progress in the 21st Century Act (MAP- 21) and for developing and carrying out a continuing, cooperative and comprehensive transportation planning process for the Metropolitan Area; and

WHEREAS, the Metropolitan Washington Council of Governments (COG) is the administrative agent for the National Capital Region Transportation Planning Board (TPB); and

WHEREAS, in 2005 the Safe, Accountable, Flexible and Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU), established the Section 5316 Job Access and Reverse Commute (JARC) program to improve access to jobs for low-income persons and the Section 5317 New Freedom program for transportation improvements for persons with disabilities; and

WHEREAS, SAFETEA-LU also established the Section 5310 Elderly and Individuals with Disabilities program which was administered on a statewide basis by the District of Columbia Department of Transportation (DDOT), the Maryland Transit Administration (MTA) and the Virginia Department of Rail and Public Transportation (DRPT); and

WHEREAS, in August 2006 COG, as the administrative agent for the TPB, was designated by the Mayor of the District of Columbia, the Governor of Maryland, and the Governor of Virginia as the recipient to administer the JARC and New Freedom programs in the Washington DC-VA-MD Urbanized Area; and

WHEREAS, in July 2006 the TPB established the Human Services Transportation Coordination Task Force to oversee the development of the Coordinated Human Services Transportation Plan to identify transportation needs to be addressed by the JARC, New Freedom and Section 5310 programs, and a competitive selection process for identifying projects for JARC and New Freedom funding in the National Capital Region; and

WHEREAS, the Coordinated Plan was developed under the guidance of the task force which included the active participation of representatives from public, private and non-profit transportation and human services providers, as well as participation by members of the public who provided insight into local transportation needs and strategies for improvement for low-income communities, persons with disabilities and older adults; and

WHEREAS, the Coordinated Plan, the selection criteria and the process for a competitive selection process were adopted by the TPB at its regular meeting on April 18, 2007 (R22-2007); and

WHEREAS, the TPB adopted an Update to the Coordinated Human Service Transportation Plan at its regular meeting on December 16, 2009 (R13-2010); and

WHEREAS, in 2012 MAP-21 established the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program to fund projects to serve the special needs of transit-dependent populations beyond traditional public transportation services and Americans with Disabilities Act (ADA) complementary paratransit services; and

WHEREAS, MAP-21 provides a single apportionment for Section 5310 Enhanced Mobility program funds to the Washington DC-MC-MD Urbanized area and requires that in large urbanized areas a Designated Recipient be named before funds are awarded;

WHEREAS, on October 10, 2012, the Federal Transit Administration (FTA) issued guidance asking that MPOs in large urbanized areas initiate the process for designating a new 5310 Designated Recipient;

WHEREAS, beginning in October, the chair of the TPB Human Service Transportation Coordination Task Force and TPB staff have facilitated discussions with staff of the DDOT, MTA, DRPT and the Washington Metropolitan Area Transit Authority (WMATA) on the designation of a recipient to establish the new program in the Washington Region; and

WHEREAS, these discussions have led to the recommendation that COG, as the administrative agent for the TPB, serve as the Designated Recipient for the Section 5310 Enhanced Mobility Program and that the program be implemented in accordance with a competitive project selection process guided by the TPB Human Service Transportation Coordination Task Force and the Coordinated Plan, and approved by the TPB;

NOW, THEREFORE, BE IT RESOLVED THAT the NATIONAL CAPITAL REGION TRANSPORTATION PLANNING BOARD authorizes the Chair to submit a formal request in the attached letter to the Mayor of the District of Columbia, the Governor of Maryland, and the Governor of Virginia to designate the Metropolitan Washington Council of Governments, as the administrative agent for the TPB, as the recipient for the Washington DC-MD-VA Urbanized Area Section 5310 Enhanced Mobility Program.

Adopted by the Transportation Planning Board at its regular meeting on March 20, 2013



DRAFT LETTER TO MAYOR GRAY, GOVERNOR O’MALLEY, AND GOVERNOR MCDONNELL

District of Columbia

Bowie

College Park

Frederick County

Gaithersburg

Greenbelt

Montgomery County

Prince George’s County

Rockville

Takoma Park

Alexandria

Arlington County

Fairfax

Fairfax County

Falls Church

Loudoun County

Manassas

Manassas Park

Prince William County

March 20, 2013

The Honorable Vincent C. Gray
Mayor, District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue NW, Suite 316
Washington, DC 20004

The Honorable Robert F. McDonnell
Governor, Commonwealth of Virginia
Patrick Henry Building
1111 E. Broad Street, 3rd Floor
Richmond, VA 23219

The Honorable Martin O’Malley
Governor, State of Maryland
State House
100 State Circle
Annapolis, MD 21401-1925

Dear Mayor Gray, Governor McDonnell, and Governor O’Malley:

Pursuant to a resolution adopted by the National Capital Region Transportation Planning Board (TPB) on March 20, 2013, I am formally requesting that you designate the Metropolitan Washington Council of Governments, as the administrative agent for the TPB, the official recipient of the Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program funds for the Washington D.C-VA-MD Urbanized Area.

This request for designation was developed in collaboration with the District Department of Transportation (DDOT), the Maryland Transit Administration (MTA), the Virginia Department of Rail and Public Transportation (DRPT), and the Washington Metropolitan Area Transit Authority (WMATA). The TPB is the metropolitan planning organization (MPO) for the Washington Region and its membership includes representatives of the transportation agencies of the District of Columbia, Maryland, and Virginia, local governments, WMATA, the Council of the District of Columbia, the Maryland and Virginia General Assemblies, and non-voting members from the Metropolitan Washington Airports Authority and federal agencies.

The Moving Ahead for Progress in the 21st Century (MAP- 21) established the Section 5310 Enhanced Mobility Program to serve the special needs of transit-dependent populations beyond traditional public transportation services through grants to non-profit and local government agencies. The program provides a single apportionment to the Washington DC-MC-MD Urbanized area. Furthermore, MAP-21 requires that in large urbanized areas, a Section 5310 Enhanced Mobility Designated Recipient be named before funds are awarded.

Since 2006, COG, as the administrative agent for the TPB, has been serving as the designated recipient of the Section 5316 Job Access and Reverse Commute (JARC) program and the Section 5317 New Freedom program under the Safe, Accountable, Flexible and Efficient Transportation Equity Act – A Legacy for Users (SAFETEA-LU). COG and TPB will build upon the successful implementation of the JARC and New Freedom programs to implement the new Section 5310 Enhanced Mobility. This effort will be conducted in accordance with a competitive selection process guided by stakeholder involvement from the TPB Human Service Transportation Coordination Task Force and its Coordinated Human Services Transportation Plan, and approved by the TPB.

The timeliness of this designation is important because Enhanced Mobility funds cannot be utilized until the designation is on file with the Federal Transit Administration (FTA). I am asking that a letter designating COG the recipient of Section 5310 Enhanced Mobility funds for the Washington D.C.-VA-MD Urbanized Area be sent to the FTA Region III Administrator, Brigid Hynes-Cherin, by April 30, 2013.

If you need more information, please contact Ronald Kirby at (202)-962-3310 or rkirby@mwkog.org, or Wendy Klancher at (202)-962-3321 or wklancher@mwkog.org of the TPB staff, who will be pleased to answer any questions you or your staff may have regarding this request.

Sincerely,

Scott York
Chairman
National Capital Region Transportation Planning Board

cc: Terry Bellamy, Director, District Department of Transportation
Sean Connaughton, Secretary of Transportation, Commonwealth of Virginia
Darrell Mobley, Acting Secretary of Transportation, State of Maryland

METROPOLITAN WASHINGTON  COUNCIL OF GOVERNMENTS

One Region Moving Forward

January 8, 2014

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Manassas Park
Prince William County*

**Adjunct Member*

Honorable Patrick Wojahn, Chair
National Capital Region Transportation Planning Board
777 North Capitol Street, NE
Washington, D.C. 20002

Dear Chair Wojahn:

Thank you for providing an opportunity to the Climate, Energy and Environment Policy Committee (CEEPC) of the Metropolitan Washington Council of Governments (MWCOG) to comment on the draft Regional Transportation Priorities Plan (RTPP).

CEEPC was established by the MWCOG Board in April 2009 to serve as its principal policy adviser on climate change, energy and other environmental issues. The committee is responsible for managing implementation of the region's Climate Report, adopted by the MWCOG Board in 2008. The Climate Report includes a series of recommendations to reduce greenhouse gas (GHG) emissions from transportation and land use, including increasing fuel and travel efficiency, reducing vehicle miles traveled (VMT), improving land use patterns, and developing a regional planning process that includes stated goals for GHG reductions from the transportation sector. The report sets regional goals for reducing GHG emissions, including goals to return to 2005 levels by 2012, to reduce emissions by 20 percent by 2020 and to reduce emissions 80 percent by 2050, compared to 2005 levels. The 2020 and 2050 targets were also adopted in Region Forward.

CEEPC commends the National Capital Region Transportation Planning Board (TPB) for its multi-year effort to develop the RTPP and proactively engage stakeholders. We are pleased the effort included a focus on enhancing environmental quality and protecting natural and cultural resources. Overall, the plan demonstrates a thoughtful assessment of challenges facing the region's transportation sector going forward, and careful identification of strategies and priorities for solving these challenges. We hope TPB will move to adopt the plan and will begin taking steps to implement the plan in early 2014.

In light of the adopted regional GHG goals and TPB's 2013 Constrained Long Range Transportation Plan (CLRP) Performance Analysis, which shows that transportation sector GHG emissions are above 2005 levels, CEEPC recommends that the RTPP commit to establishing quantitative goals for reducing transportation sector GHG emissions for appropriate future years, taking into consideration the regional goals adopted by MWCOG.

CEEPC would like to work with TPB to examine emissions from the transportation sector and to identify cost-effective strategies and opportunities to reduce emissions to help meet the regional goals. The committee encourages the transportation sector to take a holistic view of its impact on regional emissions, including all other transportation related activities such as rail operations, commercial aviation, and construction.

CEEPC recommends that the RTPP acknowledge the importance of maintaining and increasing tree canopy and incorporating the concept of "Green Streets," which can serve to enhance communities, improve air quality, reduce water pollution and store carbon.

The sector can also begin to further examine the integration of renewable energy technologies and continue to support new clean alternative fueling infrastructure. Such additional focus will contribute to achieving the environmental goals outlined by Region Forward.

One area of strong CEEPC support is the plan's emphasis on transit-oriented development and the long-term strategies to accommodate future growth and enhance circulation within Regional Activity Centers. These efforts will help alleviate traffic congestion and reduce per capita VMT, resulting in improved air quality and lower GHG emissions, which are both objectives of the Region Forward vision.

CEEPC also agrees with the fundamental need to continue funding for the metro system to improve access, maintenance and reliability. A robust public transit system will be critical to reducing GHG emissions while accommodating regional population growth.

CEEPC supports the plan's multimodal approach, including strategies to promote electric vehicles and commute alternatives, to expand pedestrian and bicycle infrastructure, to develop new cost-effective transit systems, such as Bus Rapid Transit (BRT), to connect activity centers, and to introduce express toll lanes in the region. Initiatives promoting a variety of transportation options will further contribute to reducing automobile dependency and cutting GHG emissions in the region. CEEPC recommends that the RTPP promote alternative fueled vehicles, such as compressed natural gas buses and trash trucks, in addition to hybrids and electric vehicles, as CNG vehicles can further reduce both GHG and particulate emissions.

CEEPC hopes that implementation of the RTPP process will lead to a more concerted and inclusive effort to address GHG emissions from the transportation sector and will encourage development of additional strategies and measures to reduce onroad mobile GHG emissions.

CEEPC acknowledges that achieving the goals outlined in the plan will be a long term process involving many stakeholders. CEEPC would like to be a partner in this regional conversation and in the efforts to make the plan a success. In order to realize the RTPP goals, it will be critical to establish a framework to assist state and local governments in developing projects that advance the plan's priorities, as well as to foster the necessary investments for regional and local projects. CEEPC would like to offer its assistance in bringing stakeholders to the table and encouraging local leaders to take action on the region's priorities, such as providing support for funding of the Metro 2025 plan.

Thank you again for the opportunity to comment on the draft Regional Transportation Priorities Plan. We look forward to working together to advance our common goals for a more sustainable future for our region.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Berliner', written in a cursive style.

Roger Berliner
Chair, Climate Energy and Environment Policy Committee
Metropolitan Washington Council of Governments

National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202 TDD: (202) 962-3213

January 15, 2014

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue S.E., W12-140
Washington, DC 20590-0001

Via Electronic Submission to: www.regulations.gov

RE: *Federal Register*; Request for Comments – USDOT-FHWA Docket No. FHWA-2013-0050 – Designation of the Primary Freight Network – Comments from the National Capital Region Transportation Planning Board

To Whom It May Concern:

The National Capital Region Transportation Planning Board (TPB) is the metropolitan planning organization (MPO) for the metropolitan Washington, D.C. area, including the District of Columbia as well as portions of the states of Maryland and Virginia. The TPB hereby submits the following comments regarding the November 19, 2013 *Federal Register* publication of the Designation of the Primary Freight Network (PFN). The TPB also anticipates that the District of Columbia, Maryland, and Virginia departments of transportation will submit comments to the docket including specific state concerns.

The primary concern of the TPB regarding the designated PFN relates to the constraints caused by its unduly low 27,000-mile statutory limit, which is significantly less than even the 41,000 miles of Interstate highways nationally. This limit, allowing for less than 200 miles of roadway in the approximately 3,500 square mile, 5 million population National Capital Region, precludes the PFN from accurately reflecting the breadth of roadways (and non-roadway facilities) critical to the region's freight movement and economy. Of particular concern is the designated PFN's omission of access roadways serving Dulles International and Ronald Reagan Washington National Airports, as well as the almost total omission of roadways in the District of Columbia. Furthermore, future performance measurement based upon the designated PFN will not be able to give an accurate picture of the National Capital Region's freight conditions and needs.

The TPB asks more clarity regarding future uses of the PFN designation, especially regarding performance measurement and funding decision making. Data sources on designated facilities will have to be sufficient for the performance measurement required for those facilities. Flexibility will be essential in how the designated PFN facilities are considered in future funding eligibility and decision making in contrast to non-PFN facilities. Future enhancements to both the statutory and regulatory aspects of the PFN designation should be made based upon experience and lessons learned.

Docket Management Facility
USDOT-FHWA Docket No. FHWA-2013-0050
January 15, 2014
Page 2

The TPB appreciates the opportunity to comment. Please feel free to contact me or Andrew Meese of my staff, at ameese@mwkog.org or (202) 962-3789, if we can provide any additional information.

Sincerely,



Gerald Miller
Acting Co-Director
Department of Transportation Planning
National Capital Region
Transportation Planning Board