

**ITEM 7 - Action**  
October 15, 2014

Review of Comments Received and Acceptance of  
Recommended Responses for Inclusion in the Air Quality  
Conformity Assessment for the 2014 Financially Constrained  
Long-Range Transportation Plan (CLRP) and the FY 2015-2020  
TIP

**Staff Recommendation:** Receive briefing on the comments received and accept the recommended responses for inclusion in the air quality conformity assessment for the 2014 CLRP and FY 2015-2020 TIP.

**Issues:** None

**Background:** These draft documents and web-based information were released for public comment on September 11 and the public comment period for these documents ended on October 11. Public comments are posted as received on the TPB web site. The final version of the comments and responses memorandum will be incorporated into the document scheduled for consideration under agenda items 8 and 9.





# NATIONAL CAPITAL REGION

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## TRANSPORTATION PLANNING BOARD

Item 7

### MEMORANDUM

October 15, 2014

To: Transportation Planning Board

From: Kanti Srikanth  
Director,  
Department of Transportation Planning

Subject: Comments Received and Acceptance of Recommended Responses for Inclusion in the Air Quality Conformity Analysis for the 2014 Financially Constrained Long-Range Transportation Plan (CLRP) and FY 2015-2020 Transportation Improvement Program (TIP)

### Background

On September 11, 2014, the draft air quality conformity analysis for the 2014 CLRP and FY 2015-2020 TIP was released for public comment at the TPB Citizens Advisory Committee (CAC) meeting. The Board was briefed on the analysis and these documents at the September 17, 2014 meeting. The public comment period for the analysis and documents closed on October 11, 2014.

Public comments submitted by individuals, organizations, and businesses were posted as they were received on the TPB web site at [www.mwcog.org/transportation/public/comments.asp](http://www.mwcog.org/transportation/public/comments.asp). The comments received are provided in a separate memorandum. This memorandum provides recommended responses to comments received.

The Board will be briefed on the comments received and recommended responses, and asked to accept the comments for inclusion in the air quality conformity assessment for the 2014 CLRP and FY 2015-2020 TIP.

### Comments and Responses

The comments can be grouped into three categories: A) Metropolitan Washington Air Quality Committee (MWAQC) Conformity Comment letter, B) Plans for the I-270/US 15 Corridor in Maryland, C) Maryland -Virginia Connections Should be Reevaluated, D) the 2014 CLRP Should Focus on Accessibility, and E) the 2014 CLRP Should Be More Strategic.

#### 1. MWAQC Conformity Comment Letter

In a letter dated October 2, 2014, MWACQ concurred that the transportation sector emissions associated with the proposed transportation plans meet the approved motor vehicle emissions budgets (MVEBs) for the 1997 8-hour ozone national ambient air quality

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standard (NAAQS); the MVEBs found adequate for the 1997 annual fine particulate matter (PM2.5) NAAQS; and the approved MVEB for the carbon monoxide (CO) NAAQS.

MWAQC also provided the following comments on the 2014 Constrained Long Range Plan (CLRP), the FY2015-2020 Transportation Improvement Program (TIP), and prospective developments in the air quality conformity process.

- a. **Comment:** MWAQC strongly urges TPB to maintain its commitments to Transportation Emission Reduction Measures and other emission reduction measures.

**Response:** The TPB remains committed to work with the transportation agencies to implement transportation emissions reduction measures (TERMs). The Departments of Transportation have indicated that they plan to continue to fund and implement the regional TERMS in addition to other such projects being implemented locally.

- b. **Comment:** MWAQC would like to work with TPB to update the annual PM2.5 and NOx MVEBs described in the (PM2.5 Maintenance Plan) above plan using the MOVES2014 model, updated 2014 motor vehicle registration data, and the most current version of TPB's Travel Demand Model.

**Response:** The TPB staff worked with MWAQC, the state air and transportation agency staffs in developing the PM2.5 Maintenance Plan using the latest tools and planning assumptions at that time. The TPB staff will do so again in update of this Plan

- c. **Comment:** MWAQC will need the support and consultation with TPB to examine emissions from the transportation sector and to identify new cost-effective strategies and opportunities to reduce emissions in order to meet future tougher Ozone Standards.

**Response:** The TPB and its staff has worked with MWAQC, the state air and transportation agencies in developing the State Implementation Plans to attain the previous the national ambient air quality standards for Ozone and other criteria pollutants and intends to do so in the future as new standards are promulgated.

## 2. Plans for the I-270/US 15 Corridor in Maryland

**Comment:** Regarding the proposed widening of Interstate 270 and US Route 15 through Montgomery and Frederick Counties, comments were received from members of the public in favor of immediate widening and in opposition to widening of the highways. Commenters were unanimous in noting the congested traffic conditions along the corridor. Most commenters favored widening the road immediately for traffic relief. Others noted the environmental impacts of widening and favored investment in MARC commuter rail and MTA commuter bus, along with bus on shoulder operations.

**Response:** The Maryland Department of Transportation (MDOT) and the Maryland State Highway Administration (SHA) completed an I-270/US 15 Multi-Modal Corridor Study in 2003 with a subsequent Alternatives Analysis in 2008. There are varying assumptions on different segments of the corridor; in general, the planned widening includes the construction of at least one additional general purpose lane (more in some segments) in each direction from I-370 to Biggs Ford Rd. The Multi-Modal Corridor Study also considered other planned improvements in the corridor, particularly the planned construction of the Corridor Cities Transitway (CCT) north from the Shady Grove Metro Station in the City of Rockville, which will provide a high-quality transit option by 2021. The

MARC Growth and Improvement Plan also provides for improvements to service along the Brunswick commuter rail line over the next decade.

MDOT and SHA continue to work with Suburban Maryland local governments and transit providers to make significant investments in improving this important transportation corridor, with investments in both the highway network and public transit. As projects in the corridor moves towards construction, there will be opportunity for additional input by the public. MDOT is also working with local governments to better coordinate land use planning and transportation planning to reduce travel volumes. Even with Maryland's high level of investment in non-highway projects, it is still necessary to provide some major highway improvements in this corridor with its high rate of population growth.

### **3. Maryland - Virginia Connections Should be Reevaluated**

**Comment:** Given its previous work on assessing bottlenecks, the TPB should explore improved connections between Maryland and Virginia, including across the American Legion Bridge on I-495, between I-95 in Maryland and I-66 in Virginia, and an additional Potomac River crossing. Major projects such as these would be more beneficial to the residents of suburban jurisdictions.

**Response:** The TPB continues to work with its member jurisdictions and agencies in the exploration of projects for improved regional connections. There has been significant exploration of additional transportation capacity on the Beltway and across the Potomac River. The I-495 Beltway Express Lanes in Virginia opened in November 2012, and an additional extension to the Legion Bridge is planned for construction in future years. The Virginia Department of Transportation (VDOT) is working to complete the Potomac River Crossings Data Development Study, which will establish a common set of data from which Virginia, D.C. and Maryland can discuss approaches to ease congestion and increase multi-modal mobility among the three jurisdictions. In Maryland, the West Side Mobility Study was completed in 2008 which identified multiple options for improvements across the Legion Bridge and continuing up I-270. At a local level, in July 2013 the county councils of Montgomery and Fairfax met in a bilateral session to discuss the options for improved connections between the two jurisdictions, including transit service between the two jurisdictions.

### **4. The 2014 CLRP Should Focus on Accessibility**

**Comment:** The Access for All (AFA) Committee provided comments on the draft 2014 CLRP in a letter distributed to the TPB at its September 17 meeting. In their letter, the AFA stressed the importance of transportation projects providing more accessibility and service for people with disabilities and low-income. In addition, the AFA expressed their concern about policies, particularly the price of tolls and fares, which disproportionately affect disabled and low-income citizens.

**Response:** Besides being distributed to the TPB, the AFA's letter on the impacts of projects and costs on low-income populations was also transmitted to lead transportation planners at the three state departments of transportation and to WMATA, for their acknowledgement and consideration. The main part of the comments pertains to the design and/or construction of projects, which are better addressed in the planning and implementation stages of specific projects.

The TPB continues to emphasize the importance of consideration of special needs in its Vision and Regional Transportation Priority Plan documents. An ongoing strategy of “ensure accessibility for persons with disabilities, low incomes, and limited English proficiency” is one of the priorities of the RTPP. Through the AFA Committee, the TPB continues to ensure the voice of these groups is heard and communicated to elected officials, transportation planners, and the general public. .

## 5. The 2014 CLRP Should Be More Strategic

**Comment:** The Northern Virginia Transportation Alliance commented that there should be a greater focus on projects of regional significance in the draft 2014 CLRP. The Alliance suggested that TPB should establish priorities by identifying investments that will move the greatest number of people, reduce travel time, increase reliability of the network region-wide, and produce the best long-term return on investment. The Alliance commented that that many of the projects in the 2014 CLRP are local in nature and will not provide more regional benefits, and suggested re-directing funds to their list of regional projects.

**Response:** The TPB continues to work with its member jurisdictions and agencies to provide a set of policy principles and priorities for transportation improvement projects to address the region’s mobility needs through its Vision and Regional Transportation Priority Plan. These documents call for projects that move more people, reduce regional congestion and improve reliability and predictability of operations on the region’s transportation facilities. The third priority of the RTPP calls for the region to “move more people and goods more efficiently”, by focusing on transportation planning and investment to alleviate current congestion and accommodate future growth in the region.

The draft 2014 CLRP includes transportation projects aimed at addressing these and other TPB policy principles and priorities. The TPB staff worked with the staff of its member jurisdictions and agencies in developing the financial plan element of the draft 2014 CLRP, which reflects the planned allocation of federal, state and regional revenues for projects and programs that have been identified by the member jurisdictions as urgent needs consistent with regional priority principles. It is recognized that there are unmet needs for improving the region’s transportation system and efforts to address these needs are underway.