

Environmental Defense
*** Chesapeake Bay Foundation * Audubon Naturalist Society of the Central**
Atlantic States

January 28, 2004

The Honorable Chris Zimmerman
Chairman, Metropolitan Washington
Transportation Planning Board
777 N. Capitol St. NE #300
Washington, DC 20002

Re: Release of Improved TPB Version 2.1 C Travel Model Setups

Dear Mr. Zimmerman:

On December 15, 2003, we submitted a request to the TPB for access to the latest Version 2 travel model data and software setups, reflecting recent enhancements to the Version 2C model. Today, we are writing to again request the immediate release of the full model setups for the TPB's latest improved version of the Version 2.1 C travel model to members of the TPB Travel Forecasting Subcommittee and other interested stakeholders. Our counsel had been informed by Mr. Kirby by telephone on January 16 that "we had all the data and set-ups necessary" to properly and fully utilize the model for our purposes.

A December 12, 2003, memo, *Maryland Intercounty Connector (ICC) Corridor Base Year 2000 Validation using Version 2.1 C Travel Demand Model*, was included as Appendix A of the Transportation Planning Board's December 24, 2003 report, *Descriptions of Proposed Work Elements for the TPB Models Development Program to a) Address Concerns Raised by the TRB Committee's First Letter Report b) Advance the State of Modeling Practice in the Metropolitan Washington Region*. This 19-page memo documented that an improved Version 2.1 C model was completed last summer by COG staff with consultant assistance and was documented in a memo prepared for and approved by the ICC Travel Demand Task Force in August 2003. Extensive information about the validation of this model against TPB and other regional traffic and transportation data was contained in the report to the TPB Travel Forecasting Subcommittee meeting on January 23, 2004, seeking the Subcommittee's affirmation of this work as a response to the comments of the TRB peer review panel's criticism of the TPB Version 2 travel model. Improvements have continued to be made, especially with respect to the ICC study area and alternative alignments.

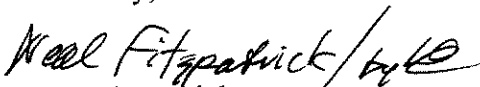
At that January 23, 2004 meeting, Michael Replogle requested immediate release of the improved Version 2.1 C travel model base year validation data sets to interested members of the Travel Forecasting Subcommittee and other stakeholders, noting that the members of the Subcommittee could properly evaluate this extensive presentation of model refinements and validation results only by full access to the model setups. TPB staff indicated that they would not release the model setups until the ICC public meetings in March or April 2004, stating that this model refinement (which would be billed as Version 2.1 D) was a "work in progress." However, it was apparent from the

discussion that this model is now already in active production use for forecasting and analysis. The public should have equal access to precisely the same data, set-ups and information.

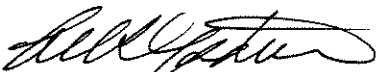
Mr. Replogle noted that a similar situation occurred in 2002, when TPB staff presented extensive information on the initial validation of the Version 2.1A model while denying interested stakeholders access to the full model setups for independent examination. In response to an immediate subsequent request to the Transportation Planning Board, the staff decision to deny public access to the model setups was overturned and the model setups were released. The resulting independent oversight led to the identification of a number of substantive errors, some of which were subsequently acknowledged by TPB staff and corrected in model Version 2.1 C. Other issues continue to be discussed as concerns of the National Academy of Sciences/TRB model peer review panel.

We ask you to overturn this staff decision to deny timely public access for independent oversight and use of these latest model improvements and upgrades. The public risks being prejudiced by tardy release of this information, and the National Environmental Policy Act (NEPA) process may be undermined if the public's comments on the ICC analysis are constrained by the fact that modeling data and information are released too late for a full and adequate independent evaluation.

Sincerely,



Neal Fitzpatrick
Audubon Naturalist Society of the Central Atlantic States



Lee Epstein
Chesapeake Bay Foundation



Michael Replogle
Environmental Defense

cc: Langley R. Shook, Sidley, Austin Brown and Wood
Nelson Castellanos, Federal Highway Administration
Neil Pedersen, State Highway Administration