National Capital Region Transportation Planning Board

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MEMORANDUM

ITEM 9

TO:	January 15, 201 Transportation Planning Board	4
FROM:	Gerald Miller and Robert Griffiths Acting Co-Directors Department of Transportation Planning	
SUBJECT:	Review of Comments Received and Recommended Responses on the Draft Regional Transportation Priorities Plan (RTPP)	

The most recent draft of the Regional Transportation Priorities Plan (RTPP) was released for public comment on December 12, 2013. The public comment period ended on January 11, 2014. The TPB is scheduled to approve the RTPP on January 15, 2014. This memorandum summarizes comments that were received during that period.

BACKGROUND

The RTPP has been developed over a two-year period beginning in the fall of 2011. On November 21, 2013, TPB staff released the latest version of the Regional Transportation Priorities Plan (RTPP), which included Ron Kirby's most recent revisions and edits.

Between November 21 and December 12, TPB staff conducted intensive outreach to identify ways in which the earlier draft could be revised to respond to continuing concerns and build consensus for approval. This revision process included a number of individual discussions and meetings, as well as a special work session on December 5 and a lengthy discussion at the TPB Technical Committee meeting on December 6. The changes in the most recent draft were carefully crafted to respond, fully and appropriately, to comments that had been received since mid-October.

The TPB held a work session on the draft RTPP prior to the December 18 meeting. The public comment period on the draft began on December 12, 2013 and closed on January 11, 2014. Copies of comments received during this period are attached.

This memorandum summarizes comments received and recommended responses.

SUMMARY OF COMMENTS RECEIVED AND STAFF RESPONSES

Comment: The RTPP should include quantitative goals for reductions in emissions, including specific targets for greenhouse gases and targets that are more stringent than current federal standards for fine particle and ozone reduction.

Response: The importance of air quality improvements is emphasized throughout the Plan. Specific references to reducing carbon dioxide emissions have been expanded in the most recent draft. However, the Plan does not include targets for any of the strategies identified and therefore it would not be appropriate to incorporate that level of detail for emissions reductions, particularly for

reductions that are more stringent than federal standards and for which there is no existing regional agreement. Planning activities that are conducted as follow-up to the RTPP's approval can consider and incorporate strategies and measure that are more specific and detailed regarding emissions reductions.

Comment: The RTPP should place greater emphasis on reducing vehicle miles travel (VMT), including targets for VMT reduction.

Response: As noted above, the Plan does not include quantifiable targets for any of the strategies and therefore it would not be appropriate to incorporate that level of detail for VMT reductions. The TPB *Vision* and *Region Forward* call for reducing VMT per capita <u>not</u> VMT. It is worth noting, however, that most of the Plan is premised on strategies that are designed to reduce our dependence on driving. This theme is woven into various strategies, ranging from the short-term improvements in access to transit stops to long-term strategies to promote a range of transportation alternatives.

Comment: The draft RTPP is confusing as to how it will be used by states and jurisdictions in selecting projects to forward for inclusion in the CLRP and TIP.

Response: As stated in the TPB resolution to approve the RTPP, "The priorities and individual strategies identified in the RTPP are intended to provide broad regional policy guidance, and encourage local decision makers to consider regional priorities when making local decisions." The Plan is not intended to be a screen or evaluation tool for assessing individual project submissions.

Comment: The RTPP planning process should have sought to identify and obtain consensus for specific transportation investments, and should not have simply compiled strategies that largely had already been identified.

Response: The RTPP scope of work, approved by the TPB in July 2011, specified that the purpose of the Plan would be to identify transportation strategies, not specific projects. At no time did the RTPP development process deviate from this purpose.

Comment: The RTPP will result in a disproportionately high amount of resources being devoted to services that are utilized by middle and upper income residents and a disproportionately low amount of resources being devoted to services utilized by lower income and minority residents.

Response: In developing the most recent draft, staff enhanced the text to ensure that the needs of lowincome and minority populations would be adequately addressed. Priority Two the second building block titled "Strengthen Public Confidence and Ensure Fairness," which begins on page 72, identifies accessibility for historically disadvantaged populations as an overarching principle that should inform all transportation decision making. Overall, many of the strategies in the Plan are designed to reduce auto-dependency and increase transportation choice, and will greatly benefit traditionally disadvantaged groups.

A number of strategies focus on the needs of low-income populations. Specially, Ongoing Strategy 5 calls for the system to be affordable for all populations and to provide better transit services that help low-income individuals, such as more weekend and off-peak services.

Comment: The draft RTPP does not adequately emphasize the east/west regional divide.

Response: In developing this most recent draft, staff enhanced the text significantly to emphasize the needs and opportunities for development on the eastern side of the region. For example, Long-Term Strategy 2 ("Concentrated Growth in Activity Centers") emphasizes the opportunities offered by Activity Centers on the eastern side of the region, which are located near existing transit stations. Consistent with TPB policies and Region Forward, the Plan calls for these places to be developed to their full potential, including a healthy job base and affordable housing.

Comment: The draft RTPP should provide more specific references regarding the need for maintenance of the region's bus fleets and solutions to address bus crowding.

Response: The Plan emphatically calls for increased attention to transit maintenance, and this most certainly includes maintenance of our bus fleets as well as rail.

Comment: The public comment period for the final approval of the RTPP was rushed. A wider regional discussion should have been conducted as part of the concluding phase of the planning process to confirm the strategies and priorities that were identified and to engender buy-in and support for the Plan.

Response: The finalization of the RTPP has undoubtedly occurred under unusual and difficult circumstances. Nonetheless, public and stakeholder input has extensively informed the Plan's development, including a region-wide public opinion survey in mid-2013. After conducting intensive final outreach in late 2013, we believe that this version of the Plan reflects broad consensus among TPB members, regional stakeholders and citizens.

Regional buy-in is essential if the RTPP is to useful and relevant. Therefore, outreach on it will be conducted after its approval. The TPB resolution on the RTPP states that "In order to raise awareness of the approved RTPP it is anticipated that informational briefings and other outreach activities to support understanding the RTPP will be provided to TPB member jurisdictions and agencies as requested."

In addition, it is proposed to begin new regional discussions about our transportation priorities in the next fiscal year. In the draft outline for the TPB's FY2015 Unified Planning Work Program (UPWP), an update of the RTPP is proposed to begin in the fall of 2014 and be finished in mid-2016 well before the next major update of the CLRP in 2018.

RECOMMENDATION

Based upon a review of the comments received, we do not recommend any substantive text changes to the draft Plan. The comments are either adequately addressed in current draft or can be considered during subsequent regional planning activities following the Plan's approval.

Several suggestions regarding editorial changes and technical corrections in the draft have been received and insofar as they will not substantively alter the document, such changes will be made before it is finalized and printed.

METROPOLITAN WASHINGTON **(G)** COUNCIL OF GOVERNMENTS

One Region Moving Forward

January 8, 2014

District of Columbia Bladensburg* Bowie Charles County College Park Frederick 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

*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,

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



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Martin O'Malley Governor

Anthony G. Brown Lieutenant Governor Robert M. Summers, Ph.D. Secretary

January 9, 2014

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 Maryland Department of the Environment (MDE) to comment on the draft Regional Transportation Priorities Plan (December 12, 2013).

MDE commends the National Capital Region Transportation Planning Board (TPB) for its three year effort to develop the plan and proactively engage stakeholders. We hope TPB will move to adopt the plan in early 2014 and report on progress towards these regional priorities in its Annual CLRP Performance Report.

MDE supports the draft plan, and also recommends the following.

MDE recommends the establishment of quantitative emissions goals for both Carbon Dioxide (CO_2) and Nitrogen Dioxide (NO_x) for key future years be included in the plan in order to compare these numbers to the MOVES model output for both CO_2 and NO_x emissions in those future years as a clear way to track progress. CO_2 trends are a clear way to track how the transportation sector is doing to help combat climate change. Downward NO_x emission trends from mobile sources are critical to both the regions air pollution problems such as ozone, and to other high priority environmental issues like deposition of nitrogen to the Bay. About one third of the Bay's nitrogen problem is attributed to air deposition.

MDE has encouraged the establishment of quantitative goals for both CO_2 and NOx throughout the past year. MWAQC's workplan includes a special project that is designed to use the best available science to establish future-year goals for the region's transportation emissions. The goals are designed to be consistent with MWCOG's environmental efforts on climate change, ozone air pollution and cleaning up the Chesapeake Bay. The special project is funded by Maryland with support from the District of Columbia. MDE invites TPB to work with us on this project as it is directly related to long range strategic planning that links the region's transportation and air quality priorities. This is particularly important right now, as the federal transportation conformity process, which was originally designed to link planning for transportation and air quality, has become extremely outdated and is no longer consistent with MWAQC's efforts to meet the current (75ppb) ozone standard.

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To ensure greater progress towards MDE's climate change goal, we hope that the plan will include additional strategies and measures to reduce greenhouse gas emissions. All of the efforts outlined above will not only help address MDE's air quality and MWCOG's climate change goals, but also the goals outlined by the Region Forward Coalition Compact.

MDE appreciates the effort TPB is undertaking in engaging various stakeholders in the development of the plan. We would like to work with TPB in coming years to ensure success of this plan.

Thank you again for the opportunity to comment on the draft Regional Transportation Priorities Plan.

Sincerely,

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George (Tad) S. Aburn, Jr., Director Air and Radiation Management Administration

CC: MWAQC Executive Committee and MDOT Don Halligan

Metropolitan Washington Air Quality Committee

Suite 300, 777 North Capitol Street, N.E. Washington, D.C. 20002-4239 202-962-3200 Fax: 202-962-3203

January 10, 2014

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 Metropolitan Washington Air Quality Committee (MWAQC) to comment on the draft Regional Transportation Priorities Plan (December 12, 2013).

MWAQC commends the National Capital Region Transportation Planning Board (TPB) for its three year effort to develop the plan and proactively engage stakeholders. We hope TPB will move to adopt the plan in early 2014 and report on progress towards these regional priorities in its Annual CLRP Performance Report.

MWAQC supports the draft plan because it provides a path forward for a sustainable transportation approach in the Washington region by establishing regional transportation priorities and using them as a policy resource for the development of future transportation and land use programs and projects in the region. The plan focuses strongly on transit-oriented development and seeks to accommodate future growth in the Regional Activity Centers. This will help alleviate traffic congestion and crowding and reduce growth in regional vehicle miles traveled (VMT) resulting in the improvement of air quality and reduction in greenhouse gas emissions, which are also Region Forward objectives.

MWAQC likes the plan's 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 Regional Activity Centers, and to introduce express toll lanes in the region. These strategies will help reduce criteria pollutant levels and greenhouse gas emissions in the region. Lastly we hope that TPB will also consider opportunities to reduce emissions in the region from all other transportation activities in the region.

MWAQC agrees with the need for continued funding for the metro system to maintain its infrastructure and reliability, which is a critical element of the plan. A reliable metro system encourages people to use it more, reducing VMT and emissions of air pollutants and greenhouse gases.

Although MWAQC supports the plan's broad goal to enhance environmental quality and protect natural and cultural resources, we recommend additional actions to achieve these goals. There should be more emphasis on reducing growth in VMT, which shows an increasing trend in the future years. We recommend promoting alternative fueled vehicles in addition to hybrids and electric vehicles as they offer potential to further reduce emissions. While emissions of precursors of ozone and fine particles such as, volatile organic compounds (VOC), nitrogen oxides (NOx), fine particulate matter (PM2.5-pri), and sulfur dioxide (SO2) have been on the decline, strategies and measures to achieve further reductions may be needed to meet current and potentially more stringent future ozone and fine particle standards. MWAQC looks forward to working with TPB to meet both current and future air quality standards and

challenges, as described in the MWAQC air quality conformity comment letter dated July 10, 2013.

To ensure greater progress towards MWCOG's climate change goal, MWAQC hopes that the plan will include additional strategies and measures to reduce greenhouse gas emissions. All of the efforts outlined above will not only help address MWAQC's air quality and MWCOG's climate change goals, but also the goals outlined by the Region Forward Coalition Compact.

I also wish to make TPB aware that MWCOG staff is currently working on a special project, funded by Maryland with assistance from the District of Columbia, which will evaluate potential goals and needs for the region's transportation emissions. This is particularly important since additional actions may be needed to meet the current (75 ppb) ozone standard. As the project progresses, I anticipate that the project analysis will be shared with TPB.

MWAQC appreciates the effort TPB is undertaking in engaging various stakeholders in the development of the plan. We would like to work with TPB in coming years to ensure success of this plan.

Thank you again for the opportunity to comment on the draft Regional Transportation Priorities Plan.

Sincerely,

Hon. Dave Snyder, Chair Metropolitan Washington Air Quality Committee

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Chairman Scott York National Capital Region Transportation Planning Board 777 North Capital Street, N.E. Suite 300 Washington, DC 20002

January 11, 2014

Dear Chairman York:

On behalf of myself and hundreds of thousands of transit riders, I want to thank you for the opportunity to offer further comments on the Regional Transportation Priorities Plan (RTPP) draft, dated December 13, 2013.

I am the founder of Transiters, an initiative representing the interests of public transit riders. I support the objective of developing an RTPP whose aims are to identify strategies with the greatest potential to respond to our most significant transportation challenges. I support much of the work and recommendations that have been provided. I am sure that you believe that transportation projects must be fair and equitable. I am concerned that the RTPP does not meet the fair and equitable test, but would result in a disproportionately high amount of resources being devoted to services that are utilized by middle and upper income majority residents and a disproportionately low amount of resources being devoted to services utilized by lower income and minority residents.



Metrobus, Tysons, November, 2009

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Metrobus, Tysons, December, 2013

TRANSIT DEMOGRAPHICS AND MODE CHOICE

Let me offer a perspective on transit mode choice in general and in the Washington DC area in particular.

As reported by the Washington Metropolitan Area Transit Administration's (WMATA) Title VI Equity Evaluation report (2011), WMATA operates a de facto racially segregated system, consisting of Metrorail, whose passengers are 55% majority, and a Metrobus system, whose passengers are 75% minority.

Separately, research by Alan Berube, Elizabeth Deakin, and Steven Raphael (2006) found that 47% of the elderly poor in in Washington DC lived in a household with no car. Nationwide while only 7.8% of all US residents live in households without access to an automobile, 33.4% of black non-Hispanic poor residents and 25.0% of Hispanic poor residents lived in households without such access.

Residents who do not have access to an automobile are by definition not "choice transit riders"--transit is often their only transportation mode. Any discussion of plans for this transit system should clearly recognize and address the demographic differences that exist within this transit system and identify the disparate impact that plans may have on one transit mode and its users versus another.

We also need to ensure that we have and use meaningful and consistent terminology, as I will attempt to use. "Transit" is commonly considered a subset of "transportation," such that the US Department of Transportation is responsible for highways, managed by the Federal Highway Administration, and transit services, which are managed by the Federal Transit Administration. Likewise WMATA, also commonly referred to as Metro, is the largest local transit agency that operates Metrorail, Metrobus, and other transit services.

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PRIORITY 1

The draft RTPP says that "Priority 1" is "meeting our existing obligations and maintaining the transportation system we already have." The draft continues by saying "the proper maintenance of our highways bridges and transportation systems, especially Metro, is of primary importance." To what exactly does "Metro" refer? The draft does not make a clear and consistent distinction between Metro as a whole, Metrorail, and Metrobus, making the statement somewhat unclear. Does the draft call for proper maintenance of the entire Metro system or for just the Metrorail system? Based on the reading of the rest of the document and with knowledge of recent Metro history, I am concerned that this reference is to Metrorail itself and that the draft RTPP would direct little attention to maintenance of the bus system.

The document further describes requirements for improving roadway facilities. Though highways and Metrorail is referred to specifically there is no reference to Metrobus service or to any other specific bus service. Reinforcing the impression that Priority 1 refers to highways and rail only are the two accompanying photographs, one of a road crew working on a highway and the other photo of the inside of a Metrorail station. Appropriate bus photos, such as those I provide here, are missing.

TRANSIT CROWDING

Review of the discussion in the draft about "transit crowding" likewise creates the impression that while the text reference is to "transit," the subject is not about transit as a whole but rather only about rail service. Under the heading "transit crowding," listed as challenge number two of goal number one (G1C2), the text says that "Metrorail" is currently experiencing crowding during peak hours, and there is a chart of Metrorail congestion during the a.m. rush-hour as well. "Bus crowding" would seem not to exist.

INADEQUATE BUS SERVICE

As far as bus service is concerned, however, goal one challenge three (G1C3) says that existing bus service is too limited, making transit "a less viable option, especially for people with disabilities and limited incomes." This statement is misleading because it suggests that inadequate bus service might not make bus service a less viable option for people without disabilities and without limited incomes. In fact, what the statement tacitly recognizes is that people without disabilities and without limited incomes, people who are sometimes called "choice riders," often consider the bus service to be so poor that it is not considered a viable option under any circumstance. How would we know if we have a good bus service? The answer is we would know we have a good bus service if choice riders use it.

While I do not have a chart that displays the level of crowding that exists on Metrobus service,

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the two photographs of Metrobus service in Tysons contained in this document, one taken in 2009 and one taken in 2013, illustrate the level of crowding that is frequently encountered.

ENHANCE ENVIRONMENTAL QUALITY AND PROTECT NATURAL AND CULTURAL RESOURCES

With respect to this, goal five, the RTPP suffers from the fact that the TPB vision has not been updated since 1998. Much has changed in the world since 1998, and, with respect to the environment, one of the most significant developments has been a much greater understanding of the impact of CO2 emissions on climate change. Transportation is the second largest source of CO2 emissions in United States, and the fact that CO2 emissions are mentioned neither in the TPB vision nor as one of the RTPP challenges represents a significant deficiency. Rather than develop a plan to satisfy an outdated goal, one of the first things that should be done when developing any plan is to make certain that the goals which such a plan is designed to realize are appropriate. The RTPP is a significant document that will have a long term impact on area transportation, and it should establish an aggressive goal that addresses greenhouse gas emissions, one of the most significant challenges that we face.

IMPROVE ACCESS TO TRANSIT STOPS AND STATIONS

I strongly support strategies to improve public transit service, but believe that investments should be made in areas that are known to maintain and increase ridership and that are affordable. I believe it is a mistake to imply, as the picture on page 32 does, that \$1 million transit stops are a realistic cost-effective near-term solution (NT1) in a public transit system with over 10,000 stops. Shelter from the elements is fine but one of the most important determinants of transit demand is the level of basic service provided in terms of frequency, reliability, and speed. Unfortunately, these types of basic service improvements are entirely absent from the list of near term strategies.

I hope these suggestions will be considered and reflected in the final plan.

Respectfully,

Stuart M Whitaker stu@transiters.com (202) 683-7384

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