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PUBLIC COMMENTS AND RESPONSES

Federal regulations require the long-range plan to include a summary analysis and report on significant public comments made as part of the public involvement process. This chapter presents summaries of the comments received on the plan and associated TIP and air quality documents along with the TPB's response to each comment. The 2003 CLRP received significant public comment, both in writing and during the TPB public comment period, throughout the update process. Below are the summaries and responses to the main categories of public comment received which were presented to the TPB at the May 21, 2003, and November 13, 2003, TPB meetings.

Response to Comments Received on Submissions for Inclusion in the Air Quality Conformity Assessment for the 2003 CLRP and FY 2004-2009 TIP

At its April 16, 2003, meeting, the TPB was briefed on the project submissions received from state, regional, and local agencies for the 2003 CLRP and the FY 2004-2009 TIP. These submissions were released for public comment and inter-agency review at the TPB Citizens Advisory Committee (CAC) meeting on April 10, 2003. The public comment period on the submissions ended on May 16, 2003. Key comments and TPB responses are summarized below.

Suburban Maryland

1. Comment: Funding the transitway from Bethesda to Silver Spring (a portion of the inner Purple Line) is welcome, but only including the Silver Spring to New Carrollton portion of the line as a study is disappointing.

Response: The transitway from Bethesda to Silver Spring has been shown for construction in the CLRP for several years. The Silver Spring to New Carrollton portion of the transitway has consensus and is being included for study in order to examine various alignments and station locations. The entire transitway is now called the "Bi-County Transitway" in the CLRP.

2. Comment: The study of the Silver Spring to New Carrollton portion of the Bi- County Transitway should be accelerated to 2005, and construction should take place at least at the same time or before the Corridor Cities Transitway (CCT) expected completion date of 2012. The proposed schedule for these projects reflects a bias towards the “favored quarter of growth” at the expense of communities in need of revitalization and traffic relief.

Response: The Maryland Transit Administration will revise the management of the study for the Bi-County Transitway with the goal of achieving consensus on a cost-effective project. The Corridor Cities Transitway is being included in the plan for construction as a “place holder,” with completion dates of 2012 (to Metropolitan Grove) and 2020 (to Comsat). The EIS process for the CCT is still underway and the alignment, completion date, and other details could change.

3. Comment: While the potential need for the Greenbelt Metro Interchange at I- 95/495 is recognized, the project should not be funded until development proposals are shown to be truly transit-oriented and pedestrian-friendly.

Response: A project location/design hearing will be held in Fall 2003. The land use and development approvals are under the local jurisdiction and the project is consistent with the local master plan.

4. Comment: The conversion of MD 210 to an eight-lane highway should not occur because it would favor long-distance commuting from Charles County, increase sprawl, and further divide Prince George’s County communities on either side of the highway.

Response: In the mailout of May 15, the status for this project was corrected to show that the proposed two HOV lanes are removed. The six-lane highway will be shown in the CLRP for reconstruction with intersection improvements and enhanced bus service.

5. Comment: The intersection improvements on MD 210 should not be included because they would favor long-distance commuting from Charles County and increase sprawl development.

Response: The intersection improvements will relieve traffic congestion along this corridor. The project is consistent with the Prince George’s County Master Plan.

6. Comment: The Intercounty Connector (ICC) Study should not be revived.

Response: A comprehensive NEPA process study will be conducted to address the concerns and issues identified in previous studies, the last of which was not completed.

7. Comment: Frederick County requests that the intersection of MD 15 and MD 26 be improved with a ramp from west bound MD 26 to MD 15.

Response: This intersection improvement is included for construction by 2010.

8. Comment: Rail connection between Alexandria, Virginia, and Branch Avenue on the Woodrow Wilson Bridge must be added to the CLRP.

Response: The design and configuration of the new Woodrow Wilson Bridge allow for the construction and operation of future rail service. HOV lanes on the bridges are shown in the CLRP as a place holder until a decision is made on a future rail service connection and on HOV lanes on the Beltway.

Northern Virginia

9. Comment: The Tri-County Parkway should not be constructed for several reasons, including its adverse impact on Bull Run Regional Park and the region's environment.

Response: The route alignment and other details are under study. The parkway is shown in the CLRP for construction by 2020 as a place holder. This project was included in the 2020 Plan adopted by the local jurisdictions in Northern Virginia.

10. Comment: Including the Tri-County Parkway in the CLRP before the Environment Impact Statement (EIS) is complete, public hearing held, and a final decision made raises procedural questions. Including the project for construction indicates that authorities have prejudged the outcome of the EIS.

Response: Projects can be included in the CLRP for construction as "place holders." The degree of specificity required in the transportation plan and the specific travel network assumed for air quality conformity analysis do not preclude the consideration of alternatives in the EIS process or other project development studies. If the outcome of the EIS is different than assumed in the CLRP, the CLRP will be amended to reflect the change.

11. Comment: The completion date of 2010 for the study of the Potomac Yards Metro Station should be accelerated to 2005.

Response: In the mailout of May 15, the study status for this project was incorrect. The Potomac Yards Metro Station is shown in the CLRP for construction and the completion date was changed from 2010 to 2015.

12. Comment: VA 28 and the Dulles Greenway should not be expanded because more lanes will increase sprawl pressures.

Response: These projects are designed to respond to traffic and development pressures that already exist in these highway corridors. The road expansions are intended to improve safety, mobility, and accessibility. These projects have been examined and developed through the Northern Virginia 2020 Plan.

13. Comment: Loudoun County requests that the proposed improvement of US 50 from west of Middleburg east to Route 616 (to be completed by 2015) be removed from the CLRP.

Response: As detailed in the letter of May 16, 2003, from VDOT to the Loudoun County Administrator, the completion date for this project will be changed to 2025.

14. Comment: The TPB should request the appropriate authorities to fix the northbound and southbound merges into the George Washington Parkway from the 14th Street Bridge.

Response: In 2001, the Federal Highway Administration (FHWA) Eastern Federal Lands Division, in cooperation with VDOT, DDOT, and the US Department of the Interior identified a number of projects, including ramp merger improvements, associated with the 14th Street Bridge to help reduce congestion and improve safety. These projects were included in the FY 2001-2006 TIP and several improvements have been completed.

Response to Comments Received on the Air Quality Conformity Assessment, the 2003 Update to the Constrained Long Range Plan (CLRP), the FY2004-2009 Transportation Improvement Program (TIP), and Project Information to Develop an Interim 2003 CLRP and FY 2004-2009 TIP

At the October 15, 2003, TPB meeting, the air quality conformity analysis, the draft 2003 CLRP update, and the draft FY 2004-09 TIP were released for a 30-day public comment period which ended on November 14. A summary of key comments and TPB responses are summarized below:

1. Comment: Since one of the greatest threats to better air quality and protecting public health is slower traffic speeds due to gridlocked roads and bridges, the TPB must do more to increase road and bridge capacity.

Response: Increases in road and bridge capacity do not always improve air quality. The effects of such increases on regional air quality are assessed in the air quality conformity analysis.

2. Comment: Since one of the greatest threats to better air quality and protecting public health is bad air transported to this region from areas outside the region, the TPB must petition Congress to amend the Clean Air Act to no longer penalize this region for air pollution beyond its borders and ability to control.

Response: Transported air from outside the region comes from all source categories, not just transportation. This issue is being addressed by the Metropolitan Washington Air Quality Committee (MWAQC).

3. Comment: The CLRP needs more balance in funding based upon actual demand, with 60 percent of all transportation revenues being spent on transit systems that carry only 6 percent of all daily trips.

Response: The region has consciously made a significant investment in its rail and bus transit systems, and has made funding commitments to operating and maintaining them, with some expansions such as rail to Dulles and to Largo and a new station at New York Avenue in the District of Columbia. In addition to the revenues shown in the CLRP through 2030, a new study is underway to identify short-term highway and transit system needs and funding availability through 2010. This information will be used to inform the public and elected and appointed officials about the critical short-term funding shortfall in the region for highway, transit, and other travel modes.

4. Comment: In the wake of 9/11, the CLRP lacks a comprehensive strategy to address transportation capacity-related regional security deficiencies.

Response: Under COG's National Capital Region Emergency Preparedness Council, a great deal of the effort has been focused on the transportation and evacuation components of the regional emergency coordination plan. This involves coordination of regional transportation management and operations activities, with priority to measures needed to ensure better preparedness in the near-term. Because of the current federal, state, and local fiscal pressures and long lead times to plan, design, and construct new transportation capacity, it is prudent at this time to focus on short-term deficiencies.

5. Comment: The CLRP is overly optimistic because sharper cost-estimating methodologies are likely to show that a number of projects will cost more than assumed within the long-range revenue forecasts.

Response: Uncertainty always exists when estimating the future costs of major transportation facilities. The cost estimates for the projects in the CLRP are provided by the transportation implementing agencies responsible for constructing and operating the facilities. Staff at each agency apply professional judgment to select the appropriate cost estimating methodology, with ongoing review and updates of the estimates as needed. The costs for major projects are reviewed and revised as needed for the updates to the CLRP.

6. Comment: The plan is not adequately funded. Federal, regional, state, and local sustained leadership has been lacking to secure higher funding levels. The plan does not include adequate new highway facilities and the most needed improvements languish as studies. A regional funding mechanism is necessary to address the funding issues.

Response: The TPB highlighted the region's shortage of transportation funds with public meetings at Union Station in late 2000 and 2001, and with the February 2001 publication: "A System in Crisis." The TPB drew attention to the regional priorities for federal reauthorization of the surface transportation programs with a reauthorization principles brochure published in October 2002, the first principle of which calls for "encouraging a strong federal/state/local partnership with enhanced participation by all parties, to generate the necessary resources to meet the region's roadway and transit needs." In addition to documenting the region's long-term funding needs, short-term critical funding issues will be explicitly examined in a new TPB study to be finalized in early 2004. Highway and transit funding needs will be quantified and specific sources of revenue will be recommended over the period from 2005 to 2010 in the study. The results from this study will be used to inform state and local funding partners on critical regional transportation needs. The TPB also hosted a conference on Value Pricing for Transportation in the Washington Region in June 2003. This successful conference led to the creation of a TPB task force that is examining ways to implement pricing strategies in the region to allow for less congested travel and new sources of revenue.

7. Comment: The plan should be more regional in scope and evaluated for how it improves connectivity, accessibility, and mobility. A new Potomac River Crossing is needed.

Response: After adopting the 2000 CLRP, the TPB was dissatisfied with the performance of the plan in meeting the goals set out in the TPB Vision. The TPB called for a Regional Mobility and Accessibility Study (RMAS) to “evaluate alternative options to improve mobility and accessibility between and among regional activity centers and the regional core.” The TPB specified that “additional highway and transit circumferential facilities and capacity, including Potomac River Crossings, where necessary and appropriate...” will be included in the study. The integrated land use and four transportation scenarios for the RMAS are currently under development with the assistance and input of the state and local transportation staff and interested citizens.

8. Comment: The plan should do more to connect outer jurisdictions and to accommodate suburb-to-suburb travel.

Response: In calling for a “web of multi-modal transportation connections,” the TPB Vision recognized the need to improve circumferential linkages among regional activity centers in outer jurisdictions, and between outlying activity centers and the regional core. Despite a major regional funding shortfall, the 2003 CLRP includes some key facilities to meet these needs, such as the planned construction of rail transit to Dulles Airport and the Corridor Cities Transitway in Montgomery County. The plan also includes a study of a key circumferential facility, the Intercounty Connector between I- 270 and US 1. In addition, the Regional Mobility and Accessibility Study noted in response to comment 7 above provides an opportunity to examine and evaluate additional circumferential linkages.

9. Comment: The plan’s highway portion should emphasize construction of long-delayed facilities. Only 17 of the plan’s 105 road improvements involve new facilities. Most are relatively insignificant.

Response: Given the funding shortfalls facing the entire region, transportation funding agencies have selected a limited number of projects, many of which are relatively small, to provide the most cost-effective improvements currently available for the region’s highway system.