

18 November, 2009

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re: Public Acceptability of Regional Road-Use Pricing:  
Can it be designed to garner public support?  
Grant Proposal for US DOT-FHWA Value Pricing Pilot Program  
Submitted by the Virginia Department of Transportation  
On behalf of the National Capital Region Transportation Planning Board (TPB)  
Working in Partnership with the Brookings Institute

Dear National Transportation Planning Board Members,

Realizing this Grant Proposal has already been submitted, I would request opportunity to make comments and present a possible change to the process if this is funded. To that end, I shall try to point my reasoning for such a request and offer a realistic alteration that may mitigate some of the issues at hand.

Having read both this Grant Proposal and the Brookings Institute paper<sup>1</sup> which supports many of the propositions in this proposal, I would note that a strong sense of *a priori*<sup>1</sup> investigation is included within the process of this study.

For instance, it is stated that “[r]evenue sources have simply not kept up with needs, in large part because fuel taxes have not been increased with inflation, nor have they taken into account improvements in vehicle fuel efficiency.” While aspects of this statement are true, it does not account for the serious shortage in highway and roads projects due to the fact that up to half the gas taxes have been funneled away from road maintenance into Mass Transportation. Discounting or not even acknowledging this fact creates more than the potential for a bias to be employed in such a study before it begins.

In another section, it is stated that “[m]any leading experts have called for the gas tax to be replaced by a system of user fees based on vehicle miles of travel (VMT). If fees could be further based on location and time of day vehicle travel, such a system could increase revenues and improve system performance by reducing congestion and emissions, including greenhouse gases.” This supposition, (which is not held by other leading experts) has not proven itself out. For instance, the concept of High Occupancy Vehicle (HOV) lanes. Not only has this not reduced automobile usage, but has increased congestion. The original concept behind HOV lanes was to decrease emissions by a rather draconian practice of attempting to force more ride sharing. Not only has this policy not reduced congestion, but as noted in the 2009 CLRP Draft Performance Analysis for the final CLRP-TIP brochure – November 2009, levels of air quality have actually increased. Yet, congestion will not mitigate levels of CO<sub>2</sub> with increased congestion.

As also noted both in this Grant Proposal and within the Brookings Institute paper, the regressive aspect of such road pricing will bear a much greater burden on the low income portion of users. Maneuverings are employed in the Brookings Institute paper to overcome this disparity, yet the fact remains that these costs will bear a much heavier burden on low income commuters who often do not have the benefit of being late to work due to traffic congestion.<sup>3</sup>

Finally, in an attempt to keep this brief, I will note one further aspect. Potential questions are formed in the *Anticipated benefits of pricing* section: "From the public's perspective, how valuable is the potential reduction in congestion resulting from road pricing?" This question assumes an answer based on the acceptance of road pricing as the only alternative. This follows closely with the Brookings Institute paper which also contains many assumed propositions.

Hopefully, these few examples are sufficient to make the case that this Grant Proposal could use a wider range of input than what is currently proposed. To that end, I have been in contact with a number of other leading professionals in this area through the Heritage Foundation. In fact, this contact was specifically for a planned discussion for the Citizens Advisory Committee (CAC) to the National Transportation Planning Board (TPB) on this Brookings Institute paper. Hence, I am able to offer the staff of the TPB a number of contacts to engage for a mutual influence on this process, to that of the Brookings Institute, in an attempt to mitigate any perceived or real bias and ensure full transparency. While this may only take place for the expert panel proposed in this Grant, these contacts will prove useful for future proposals such as this.

My original contact was Ron Utt, Ph.D. and he may well be available. Others who were noted as potential persons of interest were Alan Pisarski – a previous chief at TPB, Bob Chase at NVATA or Jonathan Gifford or John McClain at GMU – also from CoG employees.

Respectfully submitted,

Farrell Keough

1. 1 a : deductive b : relating to or derived by reasoning from self-evident propositions  
- compare a posteriori c : presupposed by experience  
2 a : being without examination or analysis : presumptive b : formed or conceived beforehand
2. Road-use Pricing: How Would You Like to Spend Less Time in Traffic?  
Benjamin K. Orr and Alice M. Rivlin  
[http://www.brookings.edu/papers/2009/0625\\_transportation\\_rivlin\\_orr.aspx](http://www.brookings.edu/papers/2009/0625_transportation_rivlin_orr.aspx)
3. As noted in the Grant "[h]igher-income drivers are most able to afford the peak charges, and the saved is more valuable to those drivers with higher incomes (because their hourly wage is higher). Lower income drivers are more likely to have to change their behavior so that they drive when charges are less, or switch to other modes of travel Low-income motorists are also more likely to own less-fuel efficient vehicles, so any congestion pricing policy that takes vehicle type into consideration will fall upon them disproportionately." (Brookings paper, page 3)

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re: Greater Washington 2050:  
COG's Vision for the National Capital Region  
in the Twenty-First Century  
Metropolitan Washington Council of Governments  
777 North Capital Street, NE, Suite 300  
Washington, D.C. 200002

Dear Coalition Members,

Your publication of the Vision for the National Capital Region in the Twenty-First Century shows a genuine attempt to tackle a myriad of issues facing this area. You should be applauded for such a Herculean effort.

Recognizing this process involves many people's priorities as well as many areas of focus, I would offer a few points that need clarification. My comments will be limited specifically to these areas without comment upon the breadth of this effort and whether governmental intervention is the best mechanism to influence many of the areas presented in this document.

To that end, on pg. 17, the following statement is made: "Vehicles miles traveled (VMT) measures automobile use and trip length. According to the Transportation Planning Board, the current total VMT per capita has increased over time and is currently nearly 23 miles a day." This comment is contradicted by the 2009 CLRP Draft Performance Analysis for the final CLRP-TIP brochure – November 2009. On page 4, the Growth and Travel Demand chart show an actual decrease of 1% in VMT. What is also interesting to note in this Draft is Congestion has increased substantially, and yet Air Quality has also increased!

On pg. 20, "Locating 80 percent of new affordable housing in Regional Activity Centers with easy access to transit will create mixed-income communities resilient to spikes in the cost of energy through reduced household transportation costs." On pg. 44 the target is noted as: "Beginning in 2012, 15% of all new housing units should be affordable to low or moderate income households or a minimum of 10% of all units should be affordable." This premise is flawed for two reasons: affordable housing increases housing costs and taxes and the costs of

transit are not stabilized such that costs can easily be increased – not to mention the concept of “affordable” is both a moving target and virtually ill-definable.

First, when affordable housing is required via local and State regulations, this increases the costs on housing in the surrounding areas – both the developers and property owners must make a profit and when costs are not recouped on affordable houses, costs will be increased on the remaining housing. This then increases property taxes on the more expensive homes which in turn increases the property values on the surrounding affordable housing. This then increases the taxes owed on these homes.

Secondly, without stable and realistic funding for mass transit, the costs will exceed the real or perceived benefits. As recently noted, Amtrak loses \$32 per passenger on rail. The vagaries of our energy and oil policies coupled with unstable maintenance and funding for mass transit cannot ensure these costs will remain resilient or stable.

On pg. 32, the following is noted:

Farmers need increased access to markets that pay them a decent wage for their labor, and farmland needs a land-use strategy for protection from suburban development. Agriculture production provides jobs and income to farmers and farm workers, while farmland provides open space that helps to protect ecosystems and natural resources. Demand for local food will support agriculture jobs and limit the amount of greenhouse gasses produced when transporting food long distances. Currently the majority of energy used in the U.S. food system (around 80 percent) goes to processing, packaging, transporting, storing, and preparing food. Produce in the U.S. travels on average 1,300 to 1,500 miles from farm to consumer. Since 1970, truck shipping has dramatically increased, replacing more energy efficient transportation by rail and water. Local food systems can reduce “food miles” and transportation costs, offering significant energy savings. Consumers also benefit from fresher, better-tasting, and more nutritious food, while more food dollars stay within the regional economy.

While this concept is engaging, it has serious flaws in practice. For instance, this concept was forwarded in Frederick, Maryland asking one of the largest consumers, the Board of Education, to establish such purchasing for the school system. The logistics and lack of complete variety of food stuffs, (note, agricultural products on a large scale are dependent upon climate – such things as oranges are not a viable product in more northern climates) required the program could not be established. Many government programs have been introduced into the agricultural field, and the results have neither been sustainable nor cost effective. This is an area the markets work themselves out organically much more cost effectively than government interference will produce.

On pg. 36 is it noted that a desire for annual rates of growth in median wages will exceed the rate of inflation. “With the exception of healthcare costs, most of the causes of inflation can be mitigated by our patterns of growth.” As noted earlier on pg. 20, aspects like the creation of affordable housing actually increase inflation and taxation costs. Again, more often than not, governmental interference in markets has a net negative effect.

On pg. 37, it is targeted to “maintain 5 to 7% annual growth rate in Gross Regional Product for the National Capital Region.” This target discounts the tremendous variance in capital resource between the hub of our government and the high-end employment created there and the very low income, high unemployment, and low property value areas on the edges of these high income producers. While our area generally rates 4<sup>th</sup> in the nation behind New York, Los Angeles, and Chicago<sup>1</sup>, the mere fact of Washington, D.C. being the Nation’s Capital must be accounted for when determining these aggregate measurements.

In conclusion, this Vision is very ambitious – maybe too much so. But, better to be overly ambitious and allow for an ability to pull back than to be too mild and have little room for compromise or the ability to move Targets back into more realistic areas.

Respectfully submitted,

Farrell Keough

1. [http://www.greaterwashington.org/regional/population/gross\\_reg\\_product.htm](http://www.greaterwashington.org/regional/population/gross_reg_product.htm)

**MWCOG TRANSPORTATION PLANNING BOARD**  
**GW 2050 report—No Transportation Vision**  
**Comments from**  
**Mahlon G. (Lon) Anderson, Director of Public & Government Affairs,**  
**AAA Mid-Atlantic, Washington, D.C.**

November 18, 2009

Thank you for the opportunity to comment on the Greater Washington 2050 vision plan. From AAA Mid-Atlantic's perspective, this report may have some realistic and redeeming sections but its treatment of transportation is not one of them. Its purported transportation vision is nothing short of myopic.

This region has the second worst congestion in the United States, but from reading this report, one would never know that. Your polling indicates that the public knows that and gets it, with 54% of those polled calling transportation congestion the most important regional issue. Yet fixing transportation is not seriously addressed in this report. Amazing!

Sidewalks and bicycle paths can help at the margins. And land use can play a role. Mass transit is certainly also helpful. But trails, sidewalks, bicycles, and land use alone don't fix our transportation system. Not even close.

Fixing transportation in our region also involves fixing roads. I know you don't want to hear this, but roads are the title bout in the fight to fix transportation in our region and this report does not deal with them. Roads are where the real transportation action is for the foreseeable future.

So where is the discussion about strategic improvements to our highway system? Where is the discussion of the additional Potomac River bridges needed in the suburbs where our region's growth is going to take place? We don't make this region more interconnected for most people with walking trails and bike paths. To suggest otherwise, is not only less than visionary, it's also dishonest.

It does not tackle our region's near-worst-in-the-nation congestion. Isn't that actually what 54% of local respondents - who made transportation/congestion the top concern - wanted the report to address? But it doesn't. We hunted high and we hunted low in this document, but our vision could not find this report's vision on that single overarching regional transportation issue.

Is that an oversight or is that dishonest? Or perhaps just a by-product of the very anti-roads structure of the committee? You need to ask some hard questions about the transportation section of this report. It will likely improve our walk in the park, but it won't do a darn thing for the 80% plus of commuters who must rely on our road network to get to work and soccer games, and for our first responders to respond to fires and other emergencies.

The emperor here seems to have no clothes, or the vision proffered here is suffering severe macular degeneration. We urge you to send this part of the report back to the drawing board and ask those responsible to convene a representative committee that includes road interests and commuting experts like our region's own Alan Pisarski. Then, perhaps you will be presented with a report that offers real insight into improving our transportation future in the Washington region.

Thank you.



**Statement of Robert O. Chase  
To the National Capital Region Transportation Planning Board  
November 18, 2009**

**Greater Washington 2050?  
You Can't Be Serious!**

In reading Greater Washington 2050's transportation recommendations I was reminded of tennis legend John McEnroe shouting at a linesman's missed a call--"YOU CAN'T BE SERIOUS!"

Our region has the nation's second worst congestion and the report's total transportation focus is on transit, bicycles, sidewalks and land use. YOU CAN'T BE SERIOUS.

By 2050, what is today's second worst congested network will have to accommodate an additional 2 million people, 10 million daily trips, and 100 million miles of daily VMT, yet the report contains not a single reference or recommendation regarding the need for improved highway connectivity and capacity. NOT ONE. YOU CAN'T BE SERIOUS.

Greater Washington 2050's own survey finds area residents consider transportation the top long-term challenge by a wide margin, yet its report describes this as residents only "expressing an interest in transportation." YOU CAN'T BE SERIOUS.

Residents in fact did express only middling interest in transportation choices. The report simply ignores this and focuses solely on choices, except for the most frequently chosen mode--the automobile. Again, NOT SERIOUS.

Many "targets" appear to be pulled from thin air with little basis in reality.

Perhaps the most serious aspect of the draft is the serious extent to which it is flawed.

The draft is clearly reflective of the tremendous gap that exists between the narrow perspective from which it is written and the daily transportation needs of the public as a whole. By endorsing this draft, officials will be siding with the interests of the few, while ignoring the needs of the many.

It should be recycled and re-drafted with a more realistic perspective on the relationship between all modes of transportation and land use as well as the way in which most area residents today and in the future are likely to choose to live and travel.

For a decade this body has largely ignored these realities by pursuing scenarios that range from the extreme to the absurd, while congestion, vehicles miles of travel and the travel misery index of area residents have worsened.

It's time to stop the psychotic dreaming and focus on basics by identifying and pursuing those transportation investments most likely to improve regional mobility, prosperity, land use and quality of life.

In short, it's time to BE SERIOUS about transportation.

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