August 23, 2013

The Honorable Scott York, Chairman
Transportation Planning Board
c/o Metropolitan Washington Council of Governments
777 North Capital Street, NW, Suite 300
Washington, D.C. 20002

Dear Chairman York and members of the TPB:

We appreciate the work that has gone into the Regional Transportation Priorities Plan (RTPP) and your public outreach efforts. We commend the focus on Near Term and On-Going Strategies, which include a number of important priorities including first and foremost the maintenance of the existing system. We also strongly support and urge the TPB to adopt Scenario B, transit and TOD, as the long-term strategy for the region.

**Near Term Strategies:** We strongly support the following Near Term strategies:

1) Bicycle/Pedestrian Access to Metro
2) Commuting alternatives
3) Bike and pedestrian infrastructure in general

**On-Going Strategies:** We strongly support the following On-Going Strategies:

1) Metro Maintenance
2) Highway/Bridge Maintenance
3) Bus Priority
4) Accessible transportation

Later in this letter we will share specific recommendations for refinements to these and the other Near Term and On-Going strategies. But now we wish to turn to the Long-Term strategies.

**Long Term Strategies:**

We overwhelmingly support Scenario B for a transit and transit-oriented development future, which we believe best reflects the goals of the Region Forward Compact, COG's Climate Strategy, Activity Centers investment strategy, air quality and equity and affordable housing efforts.

- We are concerned that the RTPP does not mention the COG Climate Strategy or the significant threat we face from global warming. It is this threat which makes Scenario B so essential.
We are also concerned that the RTPP seeks to downplay the role of Region Forward, adopted in 2010, as compared to the TPB Vision adopted back in 1998. The statement in the report that "Region Forward includes transportation components, largely focused on promoting alternative modes, which are a subset of goals from the TPB Vision," inappropriately downplays Region Forward treating it as a subset of the ancient TPB Vision, when in fact it provides a clear refocusing on a more sustainable approach to land use and transportation in the COG region. Scenario B is more in keeping with the sustainable vision of Region Forward.

Finally, Scenario B should also specifically mention and incorporate the Metro Momentum plan as a critical priority investment, essential for many of the new transit routes to function effectively. In fact the RTPP should include significant discussion of Momentum.

In contrast to our strong support for Scenario B, we have serious concerns about Scenario A and the combined scenario.

- Express toll lanes have proven extremely costly to construct. Their expansive double ramp systems cause these projects to rise to the cost of some high-capacity transit investments.
- Express toll lanes do not appear to help support more efficient land use patterns and could fuel continued outward expansion because of the peak hour capacity expansion that they provide.
- Moreover, the implementation has fallen far short of the promises when it comes to investment in bus transit.
- It's also inaccurate to call the bus service on express toll lanes Bus Rapid Transit. It is in reality express bus service without the land-use influencing role that linear transit can provide in the arterial environment.
- The privatization of the toll lanes, along with non-compete clauses in some cases, means that future revenues cannot be invested in our Metrorail system or other nearby high-capacity transit.

Given these issues, we have been surprised that there has not been a more robust discussion among elected officials at COG about the relative merits of the large toll lane networks that have been proposed by some staff, as compared to priority investment in rail transit, other high capacity transit, and transit-oriented development. Yet, after years of COG scenarios that show transit, TOD and jobs/housing balance, offering better transportation performance ("What Would it Take Scenario" and land use/TOD component of "Aspirations Scenario") the tolling approach continues to be pressed by staff as the top priority approach.

If tolling is to be an option for the region, then there should first be an evaluation of tolling of all existing highway lanes combined with conversion of a lane in each corridor to express bus and use of the revenues for bus and rail transit. This option would not require the expensive dual ramp structures and the disruptive construction of new highway lanes, and has the potential to create a better operational synergy with the types of transit that shape more efficient land use. In fact, it is not clear that HOT lanes encourage transit use and it could be quite the opposite. HOT lanes are a peak hour capacity management approach. Rail transit offers both a peak hour alternative to road congestion AND
a land shaping function. If HOT lanes reduce peak hour congestion they may also do so while shifting trips from transit back to driving, while also consuming funds that could support rail transit investment and a network of TOD. Highways where all lanes are tolled might send a different signal in the market and encourage more rail and other high capacity transit use, creating a better combined operational performance and certainly better long term performance than HOT lanes with express bus.

Therefore, we hope that the TPB will not support Scenario A (HOT/Express Toll Lanes) or the proposed combination of Scenario A and B. We also note that that Scenario B can be combined with a number of the Near Term and Ongoing Strategies into a very effective transit and transportation demand management approach, something the report could have addressed in detail.

Comments on the Survey:

The survey of the general public could not effectively communicate the benefits of the composite/comprehensive approach mentioned above -- in terms of improving access to daily needs and improving the performance of the entire transportation system over the long-term. Because of the numerous categories in the survey it is not possible to tell the full degree of support for a composite transit, TOD, bike/ped, information and demand management approach as compared to the toll road approach.

Finally, we are troubled by the fact that the survey included this question: "Do you think opposition from current residents and businesses will be an obstacle to transit station development?," but didn't include a similar question about potential opposition to tolls, toll road construction, and private control of toll facilities.

Additional Specific Comments:

What follows are some additional specific comments on the Near-Term and On-going Strategies and some other components of the report, followed by our recommendation for how the Regional Transportation Priority Plan should be applied.

Near Term Strategies:

Bike/Pedestrian Access to Metro - We do not recommend overpasses or underpasses for arterial streets -- only where a highway presents an obstacle to reaching the station. The proposal should not be limited to bike paths but should include complete streets with bike lanes and cycle tracks, and also bike stations.

Alleviate bottlenecks -- We caution that these near-term fixes, which the plan lists as including building new lanes, have also become the default approach leading to incremental expenditure of hundreds of millions of dollars, not tens of millions of dollars as the report states. Because of induced traffic and continuation of suburban development patterns, these projects can perpetuate traffic problems, divide neighborhoods, and divert resources that should be spent on transit, complete streets and connected local street networks. It's not that you don't do many of them, but a deeper analysis is necessary regarding their long term effects on travel, the effect on neighborhoods, the option of local street networks in lieu of arterial expansion, the option of repurposing lanes for BRT. At some point there is a huge cost. One good example being Braddock Road within the first mile or two of the Beltway.
Commute Alternatives: Perhaps the name should be Commute Options since these are often PRIMARY modes for many people in the region. The policies should include transit benefits and parking cash out. The report also omits mention of one of the region's most successful TDM programs -- the range of programs being led by Arlington with an $8 million budget and well-documented results.

Pedestrian Infrastructure: Should include recommendation for street grids in new development. Virginia sought to adopt a Secondary Street Connection standard in 2007 until it was gutted in the current administration.

Bicycle Infrastructure: Should include separated cycle tracks and bike stations.

Parking Policy: This should be added as a near-term strategy. Parking pricing, removal of parking minimums, parking cash-out (employee benefit) can all send pricing signals and encourage reduction in SOV travel.

TOD: TOD should be added as a near-term investment strategy. Approval of TOD projects is accelerating and can be implemented much more quickly than large transit and highway projects.

**On-going Strategies:**

Metro Maintenance: Concur with this top priority but believe that Momentum has many components which should be part of an on-going strategy included in this report.

Highway/Bridge Maintenance: This should include frequently updated disclosure by the DOT's of bridge and road conditions, total estimate costs of repair/replacement, and the extent of the backlogs compared to annual spending.

Bus Priority: This should include REPURPOSING existing lanes and include arterial BRT.

Roadway Efficiency: Traffic light timing must take into consideration the safety of pedestrians and bicyclists and the goal of establishing a walkable, livable environment.

Accessible Transportation: This should include training to use primary transit systems where that can be a safe and feasible option.

Enforcement -- Policy reporting must begin noting roadway design conditions the might have made the particular location more dangerous for pedestrians and cyclists and contributed to an incident.

**The Process Going Forward:**

We have long recommended that the COG vision documents like Region Forward, the Climate Strategy, air quality and equity issues have significant influence on the drafting of the CLRP. We won an amendment to that effect in the CLRP solicitation document one year, but it has scarcely been applied. To the extent that the RTPP is amended to reflect the equity and sustainability guidance of these COG policies, we are pleased that the RTPP will then be used to set priorities in the next CLRP update. But this must allow for a complete reevaluation of the CLRP including the deletion of legacy projects which do not meet the goals and strategies of the RTPP. Will this happen?
We also recommend that many local street network projects and bicycle/pedestrian investments that support TOD and walkable, mixed-use communities be acknowledged as regional transportation solutions. We recommend that packages of TOD related street, bike/ped and even TDM be created to demonstrate the magnitude of these investments and their interrelated purpose of supporting Scenario B. We also urge TDM to receive a much more robust investment from the states and localities in the COG region.

In terms of public process, we have long called for an integrated process that is easy for the public to understand and participate in -- one in which the local, regional, and state transportation planning processes and public meetings are clearly tied into the COG CLRP process. We recommend development and adoption of this process in time to be used in the 2014 CLRP update.

Finally, as part of Scenario B, this region needs to craft a regional Next Generation of Transit plan and this should be done jointly by WMATA and COG. WMATA is federally chartered to develop regional transit plans and should play a key role in development of this plan with COG -- ideally prior to the next CLRP update.

Conclusion:

This RTPP has to be more than a rearranging of the deck chairs. We face a never before seen challenge in climate change and must make fundamental changes in land use and transportation in order to reduce greenhouse gas emissions from the transportation sector. We must also do so to reduce our energy dependency and enhance our national security. In turn, we must do so to use our tax dollars wisely and to reduce transportation costs for households -- freeing up resources to spend on more productive economic and knowledge-based activity. The RTPP represents progress, but only if Scenario B becomes the priority approach for our region, in order to meet the significant global challenge we face.

Thank you,

Stewart Schwartz
Executive Director