

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
COMMENTS FROM FEDERAL AGENCIES						
1	Concerned with combining maintenance of federal parkways with other federal infrastructure. They should be separated and the language in the policy should state that parkway improvements should be done in such a way to increase safety and reliability while preserving the historic character and cultural and natural significance that the parkways bring to the region.	National Park Service	11/12/2019	A: Advance an Interconnected Transportation System that Meets Regional Planning Goals and Objectives	T.A.12	Revised policy T.A.12 and added a new policy (T.A.13) to address this comment.
2	While emerging mobility options are quickly evolving, the industry has dubbed them micro-mobility rather than small-scale. This is a more apt description.	National Park Service	11/12/2019	-	T.B.1 T.C.10	Replaced “small-scale” with “micro-mobility” in two referenced policies and within narrative.
3	The element references the Transportation Planning Board (TPB) and its importance... the element should also recognize there are several federal agencies that participate as non-voting members of the TPB.	National Park Service	11/12/2019	Introduction	-	Added language in the Element in response to comment.

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4	Department of the Navy commends NCPC for recognizing the variable access to public transportation within the Historic DC Boundary, but is concerned with continuing to base the ratios on future transit accessibility instead of current conditions.	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.4	We greatly appreciate the comment and have designed the ratios to be both aspirational and achievable. The Federal Elements include policies that direct growth and development of the national capital during the next 20 years. In the development of the parking ratio policies, staff considered both future transit accessibility and the current observed parking ratios at federal facilities. The new TMP monitoring will help assist agencies in collecting data and creating realistic milestones to achieve the parking ratios.

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5	Having a standard deviation process will be very helpful for agencies in navigating the approval process, especially with the clear criteria for deviations. However, the Navy is concerned with how this process will actually work in regards to planning documents (Master Plans and TMPs) versus project submissions. The element states that deviations will be considered for specific projects, but not for master plans. Allowing deviations at the project level still affects the overall parking ratio for installations, which needs to be reflected in the master plans. So how should agencies reflect these deviations in their planning documents? We believe this needs more clarification.	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	Addendum	-	<p>Deviations will not be permitted at the master plan level but may be considered for individual projects. The master plan is a comprehensive document that considers mission needs and anticipate new or changing activities, workforce and visitor projections, and facility conditions, typically over a 20-year planning horizon. They consider complex planning issues such as accommodating future changes in transportation and is designed to meet long-term transportation goals. Therefore, the master plan should identify how the long-term parking ratios will be achieved. As individual projects are conceptualized during the master plan timeline, temporary needs may be considered for a deviation from the parking ratio.</p> <p>Revised Element to include a new callout box 'Parking Ratio Deviations – Master Plan vs. Project?' to provide greater clarity on deviations in response to this comment.</p>
6	Criterion 3 – Need clarification that this language refers to the shortest pedestrian route, not just a radius measured from the center point of the closest transit stop (this is an incredible difference at some installations).	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	Submission Guidelines	-	<p>Revised Criterion 3 to include new language that reflects the measured distance on pedestrian infrastructure.</p>

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7	Will there be more guidance provided on the requirements for the monitoring and reporting such as a standardized process? Or will this be a more fluid process in which each agency will work with NCPC staff to determine a process specific to that agency/installation?	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	-	-	Thank you for the comment. Additional guidance has been included in the Element Addendum and Submission Guidelines in response to this comment
8	Mobility options should take into account that even if installations are accessible by transit, employees may not live in areas serviced by public transportation. This is especially true for the installations located in suburban areas.	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	-	-	As discussed in the Element's Addendum, TMPs should reflect the number of employees and where they live. Table 7 of the Submission Guidelines include criteria for deviations from parking policies. Criterion 4 considers when commute times via public transportation versus personal vehicle are a hardship for a majority of the employees at a particular facility.
9	Allowing public access through military installations poses a major security concern, and therefore is highly unlikely.	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.5	Security concerns will be addressed on a case-by-case basis. However, to improve connectivity within and outside of campuses and installations, public access should be explored. Revised policy in response to comment.
10	Submission Process: states that the Commission will take final action on each proposed telecommunication facility no later than 120 days after receiving a complete project submission. Is there a different review timeline/process for antennae than regular projects? If the review timeline will not be 30 days as with other projects, this needs more clarification.	Naval Facilities Engineering Command (NAVFAC)	11/18/2019	Submission Guidelines	-	NCPC will release the draft Antenna Guidelines for public comment at the July 2020 Commission meeting, which will, among other things, clarify the review timeline.

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11	NIH is identified as a Transit Accessible area. NIH does not agree that we can support our mission and meet this parking ratio. Per the 2013 NIH Bethesda Campus Comprehensive Master Plan, approved by NCPC, employee parking is capped at 9,045 spaces.	National Institutes of Health	10/17/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.4	Thank you for providing your comment. The long-term 1:3 employee parking goal for NIH's Bethesda Campus has been in effect since NCPC's adoption of the 2004 Transportation Element. The Commission agreed to an interim 9,045 employee space cap as a strategy to limit parking until the next NIH master plan update, which was anticipated for Commission review in 2018. More recently, NIH proposed a 2013 master plan amendment to NCPC in February 2020, and based on Commission deliberation, NIH Division of Facilities Planning staff is developing a defined employee parking reduction plan to comply with the campus's 1:3 goal. We look forward to reviewing the new parking plan in conjunction with the next master plan amendment submission, and we encourage NIH to continue to work with NCPC staff to address parking on the campus.
12	Federal planners need to seek a balance between accessibility, security and safety. NIH is committed to providing parking for ability impaired persons per Federal Law and suggests that NCPC reconsider revisions that would impose a higher standard than Federal Law. The revised recommendation would hinder a NIH goal of reducing the number of single occupant vehicles driving and parking in the center of the campus. Allowing vehicles in the center of campus increases security concerns and the potential for pedestrian/vehicular conflicts. Currently, NIH operates an ADA compliant internal campus shuttle that transports employees from the parking facilities to shuttle stops adjacent to buildings throughout the campus.	National Institutes of Health	10/17/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.6	Revised policy to reinforce adherence with federal law as it relates to the Americans with Disabilities Act.

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13	<p>NIH negotiated TMP agreements at the campus level during the master plan process. Currently we do not conduct TMPs for individual projects.</p> <p>A significant investment of staff time and resources is needed to revise the TMP. If an individual project is described in the approved Master Plan or the transportation implications of that project do not alter that which was described in the Master Plan, agencies should be exempt from supplying a revised TMP at project review.</p> <p>It is reasonable to review the parking cap and TMPs when new regional mass transit improvements are constructed or if a project that impacts transportation was not included in the Master Plan and would create parking that would exceed the established cap.</p>	National Institutes of Health	10/17/2019	Addendum	page 4	<p>Thank you for your comment. TMPs are required for certain projects with anticipated adverse transportation implications, which may hinder NIH's effort to attain its 1:3 long-term employee parking goal. The update of the Submission Guidelines clarifies what could be included as a transportation implication, but the overall requirement remains the same as the previous version. No modifications have been made to the Guidelines based on this comment.</p>
14	<p>Deviation Criterion 1: This should be determined at a master plan level, not a project level. The term "majority" is vague. NCPC should consider tying this exemption to data on the number of emergency employees with a primary duty station at a facility or campus.</p>	National Institutes of Health	10/17/2019	Submission Guidelines	SG, page 16	<p>Deviations will not be permitted at the master plan level but may be considered for individual projects. The master plan is a comprehensive document that considers mission needs and anticipate new or changing activities, workforce and visitor projections, and facility conditions, typically over a 20-year planning horizon. They consider complex planning issues such as accommodating future changes in transportation and is designed to meet long-term transportation goals. Therefore, the master plan should identify how the long-term parking ratios will be achieved. As individual projects are conceptualized during the master plan timeline, temporary needs may be considered for a deviation from the parking ratio.</p> <p>The term majority is intended to mean more than half of all employees.</p>

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15	Deviation Criterion 2: Expected area improvements do not become reality until funded and constructed. Consider allowing deviations from the parking ratio until the anticipated projects are operational.	National Institutes of Health	10/17/2019	Submission Guidelines	SG, page 16	The new TMP monitoring program is intended to occur biennially, so any projects underway to improve pedestrian and bicycle infrastructure could be included. TMPs additionally considers current and future conditions.
16	We foresee process and funding issues when it comes to not allowing parking exceptions for master plans. I am sure you have heard a similar concern from other entities. Not allowing exceptions for master plans opens up the door for additional, large, supplemental, time-consuming, and expensive NEPA analyses that would need to occur after a master plan is approved. If exceptions were allowed up front with a master plan, it would save the federal government from going through and paying for these additional analyses. And as you are aware, acquiring additional funding for major undertakings after a master plan is completed is a very difficult thing to do. The money may not always be there after the fact, which could hamstring master plan related projects as facilities and campuses build out over time.	General Services Administration (GSA)	-	Submission Guidelines	Table 7, Criteria for Deviation	Deviations will not be permitted at the master plan level but may be considered for individual projects. The master plan is a comprehensive document that considers mission needs and anticipate new or changing activities, workforce and visitor projections, and facility conditions, typically over a 20-year planning horizon. They consider complex planning issues such as accommodating future changes in transportation and is designed to meet long-term transportation goals. Therefore, the master plan should identify how the long-term parking ratios will be achieved. As individual projects are conceptualized during the master plan timeline, temporary needs may be considered for a deviation from the parking ratio.

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17	We support regular transportation reporting (it will actually help GSA with compliance) but we would like to be sure the frequency and data requirements are not onerous for the agencies to manage. If the instructions for agencies are clear and the process is fairly straightforward, it will make everyone's jobs easier.	General Services Administration (GSA)	-	Addendum	-	Thank you for your feedback. It is NCPC's intent this data collection is not onerous on the submitting agencies. The reporting will occur biennially, and the questions will be brief and are intended to reflect data already being captured by the agency. NCPC will additionally be responsible for outreach to individual agencies. Guidance can be found in the Addendum, page 9, as well as the updated Submission Guidelines.
18	Deviations: The proposal appears to capture the typical issues for employees. Perhaps include consideration of employees who work at multiple sites of a given agency. This is the case for employees at the Smithsonian's Dulles and Suitland Collections Centers as well as some employees at the Smithsonian's National Zoo and Conservation Biology Institute and some facilities and other support employees with duties at more than one campus location. Similarly, visitors' ability to use transit may also be impacted by a variety of factors. At the zoo, we have a lot of infants and small children, very steep slopes and lots of walking required within the facility and to the Metro – making travel more challenging than at the Mall museums.	Smithsonian Institution	-	Submission Guidelines	SG, page 16	Parking ratios are based off the number of employees assigned to a certain facility. Policy T.D.7 addresses needs for official business parking spaces, which are exempt from the total ratio. Visitor Parking at cultural sites or visitor destinations should not be designed for peak demand and should be based on a traffic study and other studies. This is addressed in T.D.13.
19	Workplace flexibility: workplaces covered in NCPC reviews may vary considerably in the extent to which telework is available or possible. For Smithsonian employees who interact with visitors, collections or facilities, scheduled telework may not be an option. At some federal agencies, we understand that staff are required to schedule telework several days a week because they share a desk with someone else. How is this taken into account in the policies and their application?	Smithsonian Institution	-	Federal Workplace Element, Submission Guidelines	-	Workplace flexibility policies have shifted to the Federal Workplace Element, FW.C.11, "Permit and encourage telework, compressed, and alternative work schedules for federal employees where it benefits the federal government and the public." The Deviation Criteria in the Submission Guidelines (page 16) accounts for employees unable to telework.

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20	<p>My primary comment for the draft Transportation Element is that, upon its completion and approval, there should be a coordinated effort to integrate the Element as a model and reference tool into all applicable policy documents to ensure consistent transportation practices are implemented between all impacted agencies within the National Capital Region.</p> <p>The coordination effort should include the Federal, State, regional and local government agencies as well as transportation agencies/providers located within the National Capital Region with regards to their Comprehensive/Master Plans, Parking Plans, Trails Plans and Transportation Plans (inclusive of Bicycle and Pedestrian Plans) as applicable.</p>	Marine Corps	-	-	-	<p>Thank you for this comment. NCPC is committed to coordinating with local jurisdictions, agencies, and other stakeholders to ensure consistency. Currently, NCPC staff is working with GSA and MWCOC on an update to the TMP Handbook.</p>

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COMMENTS FROM LOCAL AND REGIONAL AGENCIES						
21	Reintegrate policy rather than remain in narrative: T.D.2 Maximize employee telecommuting strategies in accordance with federal law and agency telework policies.	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	2016 policy T.D.2	Thank you for this comment. This policy will be covered in the updated Federal Workplace Element.
22	Reintegrate policy rather than remain in narrative: T.D.3 Employ compressed and alternative work schedules for employees, consistent with agency missions.	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	2016 policy T.D.3	Thank you for this comment. This policy will be covered in the updated Federal Workplace Element.
23	Reintegrate policy rather than remain in narrative: T.D.5 Steadily increase transit subsidy rates and consider applying subsidies and incentives to other forms of transportation (such as biking, walking, carpooling, and vanpooling) while not subsidizing SOV commuting or parking)	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	2016 policy T.D.5	Thank you for this comment. This policy will be covered in the updated Federal Workplace Element.

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24	Reintegrate policy rather than remain in narrative: T.H.2 Support funding to increase capacity, security, and multi-modal development of the regional transit system	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	-	2016 policy T.H.2	This is covered in Policy T.A.11, T.B.1, T.B.10. (funding and security are not addressed).
25	We also encourage NCPC to integrate policies into the Federal Element that recognize the importance of charging market rates for parking	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	-	Language is now included in the Addendum that addresses the concept of charging for agency provided parking as a TDM strategy for facilities to reach their parking ratio. A new Policy (T.D.11) has been added to the Element to encourage agencies to consider the option to charge for parking.
26	We understand that not all the parking policy areas are exclusive to the District of Columbia and thus we most strongly advocate for a change in proposed parking ratios for the Regional Core, which is served by multiple Metrorail lines and priority transit routes. Our recommended ratios are: - Regional Core: from the proposed 1 space per 5 employees to 1:8 - Transit-Rich: from the proposed 1 space per 4 employees to 1:6	District of Columbia Office of Planning (DCOP) & District of Columbia Department of Transportation (DDOT)	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.4	This policy has now been revised to reflect a 1:6 ratio in the L'Enfant City. This raise is supported by data from the Volpe Parking Study, approved by the Commission in 2017. NCPC has been at the forefront of innovative parking approaches and will continue to work to align with the local jurisdictions to reduce the total amount of parking at federal facilities when appropriate.

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27	<p>We are concerned about any proposal to expand entitlements for parking on federal facilities via NCPC's parking ratios. These ratios have been critical in producing responsible, efficient, and sustainable federal facilities, and loosening them as described in proposed policy T.D.4 could easily result in increased congestion and pollution both in the immediate vicinity of federal facilities, and region-wide. To that effect, Arlington concurs with the proposed substitute ratios provided by the District of Columbia Office of Planning (DCOP):</p> <p>a. For the regional core, 1:6-1:8 instead of NCPC's proposed 1:5</p> <p>b. For transit rich areas, 1:5-1:6 instead of NCPC's proposed 1:4</p> <p>c. For transit-accessible areas, 1:4-1:5 instead of NCPC's proposed 1:3</p> <p>d. For suburban areas, 1:3 instead of NCPC's proposed 1:2</p> <p>e. For outside of suburban areas, 1:2 instead of NCPC's proposed 1:1.5</p>	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.4	<p>This policy has now been revised to reflect a 1:6 ratio in the L'Enfant City. This raise is supported by data from the Volpe Parking Study, approved by the Commission in 2017. NCPC has been at the forefront of innovative parking approaches and will continue to work to align with the local jurisdictions to reduce the total amount of parking at federal facilities when appropriate.</p>
28	<p>While categories such as "regional core," "transit rich," and "suburban" are sensible ways to add flexibility to the parking ratios, frequent bus lines should be taken into consideration when making these determinations. Thanks to frequent, high-quality bus service, corridors like Georgia Avenue in DC and Columbia Pike in Arlington have better transit access than many rail station areas throughout the region and should be considered "transit rich."</p>	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.4	<p>The regional model (and the parking model) take into account these planned higher frequency bus lines. While the corridors impact the accessibility ratio of the nearby Transit Accessibility Zones (TAZs), they do not have nearly the same impact on the accessibility ratio as metro and the purple line during peak commute periods.</p>

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29	Proposed policy T.D.9 would weaken NCPC's parking ratios beyond what is described in T.D.4, by considering in ratios only parking spaces owned by or officially leased by the federal government, rather than the current policy (T.B.8) that includes nearby commercial spaces available for workers to pay to use on an individual basis. This does not reflect how the transportation system functions and is a clear workaround of the intent of the parking ratios. While leasing nearby parking spaces may be sensible and should be allowed, the policy should retain language that counts unleased-but-available parking in facility ratios.	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.9	Thank you for this feedback. Note that leased spaces outside a federal site would not be exempted from the total ratio. Additionally, facilities include information on surrounding commercial parking utilized by employees in their TMPs.
30	T.A.10 proposes to reword the policy regarding tour bus management to put an emphasis on "minimizing impacts." Strictly minimizing impacts, without recognizing or prioritizing the positive role these buses have in reducing traffic and pollution, could result in policies that go too far in limiting them and thus increase traffic/pollution. This policy should be reworded to "...minimize impacts on circulation, parks, viewsheds, and cultural resources, while maximizing bus and transit use."	Arlington County	11/12/2019	A: Advance an Interconnected Transportation System that Meets Regional Planning Goals and Objectives	T.A.10	Policy has been revised to address this comment.

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31	T.B.1 proposes to eliminate NCPC support for broadly defined "unmet transit needs" (including new or improved regional rapid transit lines) in favor of narrowly defined "first- and last-mile connectivity." This narrowing of support does not reflect the region's need for both first- and last-mile connectivity and significant regional rapid transit. The policy should be reworded to include support for broad transit improvements.	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.1	NCPC outlines its support in the Introduction of the Element and in the narrative of Section B that supports regional rapid transit and broad transit improvements. The intent of this policy relates to missing connections for individuals.
32	T.B.4 and T.B.5 propose to give federal facilities an easy "out" of existing requirements relating to bicycle parking, sharing, and access, by adding the words "where feasible" to existing requirements. Although it may not always be possible to accommodate bicycle users at all locations, "where feasible" is too vague and will result in unnecessary and undesirable de-prioritization of bicycle access. The policy should be reworded to either remove the words "where feasible" or to indicate a strict interpretation of what qualifies as "infeasible."	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.4 T.B.5	Policies have been revised to address comments.
33	T.B.6 proposes to remove requirements for maximum shuttle headways. Although this policy should include flexibility for operational considerations like timed transfers, shuttles that operate less frequently than every 15 minutes are significantly less useful to riders than shuttles that arrive frequently. The policy should retain the requirement for a maximum of 15-minute headways, with the caveat that longer headways may be acceptable in rare unique circumstances.	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.6	Thank you for your comment. NCPC encourages agencies to determine appropriate shuttle needs for their employees, rather than outline specific headways in this policy. NCPC staff works with agencies on their TMPs to ensure appropriate strategies are utilized to reduce overall SOV use.

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34	T.B.7 proposes to remove the requirement that federal agencies use local transit services rather than federal shuttles where local services exist. While there may sometimes be security or other considerations that make federal shuttles necessary, supporting local services wherever possible (and thus avoiding costly duplication of routes) is highly desirable. The policy should be reworded to continue support for using local services, where feasible.	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.7	Thank you for your comment. The policies in this section are written to encourage and support local jurisdiction services, and to carefully utilize shuttles when local transit is inadequate or inefficient. No modifications have been made to the Element.
35	T.B.9 proposes to support any roadway expansion that incentivizes carpooling or the use of low-emissions vehicles. This broadly worded policy could result in support for road expansion projects that primarily increase single-occupant car use, with only minor or secondary incentives for carpooling. In that event, the policy could increase Vehicle Miles Traveled (VMT), and thus ultimately increase traffic and pollution. The policy should be reworded to more narrowly support roadway projects that improve access while reducing VMT per capita.	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.9	Policy revised to address comment.

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36	T.B.10 proposes to remove the policy "encouraging" non-Single Occupant Vehicle modes of travel, in favor of merely having a transportation network that supports such modes. This proposed change removes the onus on federal facilities from encouraging non-SOV travel, and suggests existing conditions are adequate for non-SOV users. The policy should be reworded to specifically retain language requiring the federal government to "encourage non-SOV modes of transportation for federal commuters and visitors."	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.10	Thank you for your comment. Both the narrative and policies in the Element support minimizing SOV.
37	T.B.12 proposes to add a new policy requiring federal facilities to "Minimize impacts of transportation infrastructure projects on minority or low-income communities." As worded, this minimizes positive impacts such as improved access, as well as negative impacts. The policy should be reworded to only minimize negative impacts.	Arlington County	11/12/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.12	Policy revised to address comment.
38	T.C.10 proposes to eliminate the requirement that federal facilities "provide through access where possible" for trail, bike, and sidewalk users. While some circumstances may warrant closing federal facilities to through users, closing many sites unnecessarily would have significant negative consequences on the region, given the central nature of so many federal facilities. The policy should retain the requirement that through access be provided where possible.	Arlington County	11/12/2019	C: Connect Transportation and Land Use to Encourage Responsible Development Patterns	T.C.10	Policy T.C.10 is intended to ensure that federal facilities have a functioning internal network. T.B.4 and T.B.5 address outside connectivity issues.

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39	T.C.20 proposes a new policy ensuring that monumental core streets function as transportation corridors. This is a sensible policy, but it could be construed to only apply to car access. The policy should be reworded to "multimodal transportation corridors."	Arlington County	11/12/2019	C: Connect Transportation and Land Use to Encourage Responsible Development Patterns	T.C.20	Policy revised to address comment.
40	T.D.6 proposes to require parking for employees with ability impairments "adjacent to building entrances" rather than "in accordance with federal law." As written, this may have the unintended consequence of requiring new parking spaces to be constructed in infeasible and/or unsafe locations, such as on the sidewalk in front of historic downtown buildings. The policy should be reworded to more narrowly apply to locations where parking is provided on-site.	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.6	Revised policy to reinforce adherence with federal law as it relates to the Americans with Disabilities Act.
41	T.D.8 proposes to require parking spaces for "fleet or operational vehicles as needed." This will likely result in people using fleet parking spaces for private cars, as a workaround to NCPC parking ratios. The policy should be reworded to prevent this misuse.	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	T.D.8	Policy revised to address comment.

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42	Among the 2016 Policies to be Moved or Removed, it is unclear whether new language relating to T.B.1 (parking), T.D.2 (telecommute), and T.D.5 (transit subsidies) are fully retained in other documents, or if they are weakened in any way. Please ensure these policies are not weakened.	Arlington County	11/12/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	2016 policy T.B.1 T.D.2 T.D.5	T.B.1: This policy is now covered in the Section D summary text (and Deviation Criteria in the Submission Guidelines) T.D.2: This policy is now covered in the revised Federal Workplace Element. T.D.5: This policy is now covered in the narrative of the updated Federal Workplace Element in Section C.1.1.
43	According to WMATA's 2012 Metrorail survey and 2014 Metrobus passenger survey, 42 percent of peak period Metrorail passengers and 16 percent of peak period Metrobus passengers are federal employees." Metro conducts both a Metrorail and Metrobus survey every four years. Our 2016 Metrorail survey indicated that 36 percent of peak period passengers are federal employees. Our 2018 Metrobus survey indicated that 15 percent of peak period passengers are employees. We recommend that the sentence be updated accordingly.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	A: Advance an Interconnected Transportation System that Meets Regional Planning Goals and Objectives	-	Text revised to address comment.

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44	Add a policy that encourages greater coordination between regional and local transit agencies. Just as T.A.8 encourages coordination between regional and local agencies to develop an integrated system of trails, a policy should be included that encourages the federal government to coordinate with regional and local transit agencies to ensure the development of truly coordinated operations, facilities, services, and guidelines.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	A: Advance an Interconnected Transportation System that Meets Regional Planning Goals and Objectives	-	This comment is addressed in the summary of Section A, on page 4.
45	Metro recommends expanding policy T.B.2 to include lighting, so that it reads: "Work with local jurisdictions to ensure there is adequate infrastructure for bicycles and pedestrians to safely and efficiently travel to and from federal destinations, including sidewalks, adequate lighting, protected bike lanes, and multiuse trails, as appropriate."	Washington Metro Area Transit Authority (WMATA)	11/6/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.2	Policy revised to address comment.

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46	Metro supports private shuttles as a first- and last-mile solution to encourage transit use; however, Metro would like to note that these shuttles should be funded by the federal facility being served. However, before developing private shuttle routes, federal facilities should coordinate with Metro and other local transit providers to determine whether the route could be served more cost-effectively by existing transit service.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.6 T.B.7	Policy T.B.7 is written to cover limited local service issues. Policy T.B.6 has been revised to address comment.
47	We recommend adding language to this policy that encourages working with local transit station owners such as WMATA, MARC, and VRE, to ensure that the station infrastructure is equipped to handle private shuttles and circulators in cases where private shuttles are the most appropriate means of connecting federal facilities with transit stations/stops. Metro can authorize private shuttles to use underutilized bus bays, if the shuttle operator is approved by Metro's Office of Bus Planning and can comply with Metro's insurance providers. However, if sufficient bus bay capacity is not available, shuttle buses must use the Kiss & Ride area to pick up and drop off passengers. This can result in congestion within the Kiss & Ride facility that could negatively impact passengers and other modes.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	-	Thank you for this comment. Policy T.B.1 encourages support of local efforts that connect to the existing public transportation network. No modifications have been made to the Element.

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48	Add a policy that specifically identifies accessibility of the regional transit system for all users and is inclusive of elements required by the ADA. This would include accessible pathways to bus stops, landing pads, sidewalks, and curb ramps, but would also stress that ADA customers need continuity across an entire walkshed. With the large amount of land owned by the federal government in the area, especially parks in the District of Columbia, it is incumbent on federal land owners to ensure access through unobstructed sidewalks, paths and lighting. Additionally, this policy should seek opportunities to support Metro's continued investment in redundant elevators when engaging in rail station planning initiatives, which would reduce the incidents of elevator outages at stations.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	-	Policy added to address comment.
49	Metro agrees with the suggestion to coordinate with regional transportation agencies and providers of emerging transportation technologies. Metro notes that provision of data from these emerging technologies is crucial to ensure that these services improve regional travel and reduce reliance on single-occupant vehicles. Metro encourages federal facilities to gather and share data about employees' use of emerging transportation technologies with existing regional transportation agencies and providers as this data is often unavailable or limited.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	T.B.15	Thank you for this comment. The new TMP monitoring program will encourage data collection and help measure effectiveness of varied transportation demand management strategies.

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50	Metro welcomes federal support for compact development patterns at or adjacent to Metro stations, other transit centers, and multimodal corridors. However, as previously noted, while some segments of Metro's rail and bus network are at or exceed capacity, there are many other parts of the network that are underutilized. Again, Metro encourages the federal government to continue to work with Metro and the local jurisdictions to pursue development and target development assistance resources, when available, around rail stations and on bus lines that have excess capacity.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	C: Connect Transportation and Land Use to Encourage Responsible Development Patterns		Thank you for this comment. Section C policies are intended to promote responsible development patterns throughout the region. Policy T.C.1 addresses this concern as well.
51	Metro would like to ensure that any assessment of the impacts that a development project will have on the transportation system will be multi-modal in nature and include full-cost accounting. Given that some segments of Metro's rail and bus network are at or exceed capacity, any development that will exacerbate these issues should provide some sort of mitigation. Additionally, impact assessments should account for the downstream impacts of a reduction in single-occupant vehicle trips, including lower greenhouse gas emissions, reduced stormwater pollution, and lower roadway maintenance cost for jurisdictions.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	C: Connect Transportation and Land Use to Encourage Responsible Development Patterns	-	Thank you for this comment. As all federal projects are required to comply with NEPA regulations, which would account for these issues.

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52	Workplace Parking: Free and/or heavily subsidized parking has repeatedly shown to be an impetus for single-occupant vehicle use, which in turn is the driving force behind the region's greenhouse gas emissions from transportation and mobile sources. Metro strongly advocates for the re-evaluation of federal parking subsidies, which distort the market price of driving and encourage single-occupant vehicle use. We encourage NCPG to take a stronger role in this re-evaluation.	Washington Metro Area Transit Authority (WMATA)	11/6/2019	D: Promote Efficient and Sustainable Travel to Federal Destinations	-	Language is now included in the Addendum that addresses the concept of charging for agency provided parking as a TDM strategy for facilities to reach their parking ratio. A new Policy (T.D.11) has been added to the Element to encourage agencies to consider the option to charge for parking.
53	Expand last sentence to say transit stations/stops, so that it reads: "An understanding for shifts in workforce housing patterns over several years can help determine if employees are choosing to reside closer to worksites is more accessible locations near transit stations/stops, which can help reduce SOV use."	Washington Metro Area Transit Authority (WMATA)	11/6/2019	Addendum	-	Text revised to address comment.
54	The one comment I have is it possible to also reference "Fast Ferry Systems" when referencing "Water Taxis"? This is a mode that is being consider in eastern Prince William County and is a term that is more common in our jurisdiction.	Prince William County		B.3	-	Text revised to address comment.

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COMMENTS FROM INTERESTS GROUPS						
55	The NoMa BID encourages the National Capital Planning Commission (NCPC) to reduce support of shuttle buses in the draft element. We believe that the costs outweigh the benefits in neighborhoods like NoMa, where transit and other modes of transportation are plentiful. While shuttle buses can be a useful tool in reducing Single Occupant Vehicle (SOV) trips by providing “last mile” services in certain circumstances, private shuttles often duplicate services provided by other modes in neighborhoods like these; but these shuttles are restricted to a certain set of users, reducing their efficacy. Furthermore, these shuttles demand valuable curbside space or cause congestion issues by blocking single-lane roads or bike lanes.	NoMa Business Improvement District		B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region	-	NCPC believe policy T.B.6 addresses this comment, by recommending that private shuttles are used only when other local transit is inadequate or inefficient.
56	Several agencies and plans have identified North Capitol Street as a corridor in need of significant focus for streetscape improvements in the coming years: NCPC’s Monumental Core Streetscape Framework (2018) identifies this street as an important “radiating and edging” corridor in the national capital’s street network; NCPC and District government agencies have identified this corridor as a priority for streetscape improvements as part of their Monumental Core Streetscape Initiative (ongoing); and the District Department of Transportation (DDOT), in conjunction with the NoMa BID, has called for a re-evaluation of the North Capitol Street streetscape in the North Capitol Needs Assessment Report (January 2019). The NoMa BID believes that these efforts support a thorough consideration of the existing streetscape and how the corridor could become a safer, more efficient, and more attractive corridor for pedestrians, cyclists, and drivers.	NoMa Business Improvement District		-	-	Thank you for your comment. No modifications have been made to the Element.

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57	The NoMa BID encourages federal buildings and tenants to partner with neighboring buildings with excess parking supply. We support NCPC's efforts to encourage modes of travel that are alternative to SOV commutes. But as long as some parking is needed, this alternative reduces the need to build additional on-site parking at new federal office buildings. In neighborhoods like NoMa, with a high proportion of transit-users, a relatively low proportion of car-owners, and more than a dozen multifamily apartment buildings built in the last ten years, there exists a high volume of vacant and secure parking spaces, many of which are located adjacent to federal office buildings. In NoMa, about one-third of residential parking spaces (more than 1,000) are vacant, most of which is adjacent to or less than one block from tenants such as Alcohol Tobacco and Firearms, Department of Justice, and the Federal Communications Commission.	NoMa Business Improvement District		D: Promote Efficient and Sustainable Travel to Federal Destinations	-	Thank you for this feedback. Note that leased spaces outside a federal site would not be exempted from the total ratio. Additionally, facilities include information on surrounding commercial parking utilized by employees in their TMPs. No modifications have been made to the Element.
58	The NoMa BID hopes that the NCPC will include language in the Transportation Element that encourages federal developments to include building facades and sidewalk spaces that create pleasant experiences for pedestrians.	NoMa Business Improvement District		C: Connect Transportation and Land Use to Encourage Responsible Development Patterns		Policy T.C.8 addresses this comment, as well as the Urban Design Element.
59	The distinction between "federal workers" as an independent class from residents and visitors is an odd choice for the goal statement. This distinction implies that other types of "workers" are accounted for in either the resident or visitor classification and have no independent needs. Classifying the region as either federal worker, resident, or visitor is not accurate and should not reflect the groups that this plan aims to plan for.	Doug Davies Washington, DC	-	-	-	Thank you for your comment. This Comprehensive Planning document is created for the federal government, and aligns with the District of Columbia's Comprehensive Plan. Therefore, the policies are directed towards federal agencies and their employees. The two planning documents have policies that guide all users, federal or otherwise, within Washington, DC.

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60	Please get rid of bicycle helmet requirements associated with federal facilities. First, complying with local laws should be enough. Second, WABA (Washington Area Bicyclist Assoc) has come out against these requirements because they discourage bicycling and, counter-intuitively, make bicycling less safe. This may seem like a small thing, but it is the many small barriers to biking/walking/transit that people encounter every day that keep people in their cars.	Jonathan Krall Washington, DC	-	-	-	Thank you for your comment. Bicycle helmet use and requirements are not discussed in this element. No modifications have been made to the Element.
61	Please do something to remove the scourge of motorized scooters from our sidewalks. I live at 6th and Pennsylvania Ave, NW and do not own a car, so I walk everywhere. Daily I am nearly knocked down by a motorized scooter. They speed past, coming from behind with complete disregard for pedestrians, actually making physical contact with helpless pedestrians. Each week it gets worse. The abandoned scooters all over the sidewalks are also a menace. Please restrict them to bike lanes and ban them from sidewalks. Who is going to pay my medical bills when I am knocked down and injured?	Jo Ann Duplechin Washington, DC	-	-	-	Thank you for your comment. We understand there are some difficulties in adapting to these emerging technologies, and NCPC shares concerns about the visual clutter and impediment that scooters and other micromobility options can bring to our sidewalks. Policies T.B.15 and T.B.16 work to address both the benefits and potential challenges that emerging technologies bring.
62	The availability of telework is a huge positive, but it has also had an impact, including the major reduction of carpool and vanpooling. Federal agencies usually provide either parking or transit benefit (subsidies), but what is not discussed is the failure of federal agencies to adequately promote bicycling, carpool and vanpooling. Many federal garages have not kept up preferred vanpool spaces, etc. We need to rethink TDM strategies to reduce SOV travel. Part of the effort should promote part time carpooling to reach those folks who can't use the transit network, and do not come in everyday (and would normally use a regular carpool).	Jeff Price Arlington, VA	-	-	-	Thank you for your comment. This Element seeks to balance many modes of transportation and encourages federal agencies to take into account planning for non-SOV modes.