
FEDERAL TRANSPORTATION ELEMENT

(DRAFT RELEASE)

LIST OF COMMENTS RECEIVED

Notes on List of Comments:

- This document lists all comments received on the Draft 2019 Federal Transportation Element update during the public comment period.
- Comments are listed in the following order:
 - *Comments from Federal Agencies*
 - *Comments from Local and Regional Agencies*
 - *Comments from Interest Groups*
 - *Comments from Interested Individuals*

COMMENTS FROM FEDERAL AGENCIES



National Institutes of Health
Bethesda, Maryland 20892
Office of Research Facilities

October 17, 2019

Jennifer Hirsch
National Capital Planning Commission
401 9th Street, NW
Suite 500N
Washington, DC 20004

Dear Ms. Hirsch,

Thank you for the opportunity to comments on the NCPC Comprehensive Plan Transportation Element and revised Submission Guidelines. We offer the attached comments with the goal of greater clarity in your advice for federal agencies like the NIH.

I am available to talk further about these important issues at the phone number below.

Best regards,

A handwritten signature in purple ink, reading "Susan M. Roberts", is positioned above the typed name.

Susan M. Roberts, RA
Branch Chief
Facilities Planning and Programing Branch
NIH, Division of Facilities Planning, ORF
(301) 594-7570

NIH Comments regarding NCPC Draft Transportation Element and Revisions to the Project Submission Guidelines

#	Document	Section or Page	NCPC Statements in revised documents	Comment
1	Draft Transportation Element	T.D.4	Transportation Element T.D.4 identified NIH as a Transit Accessible area and states that “the parking ratio should not exceed one space for every three employees (1:3)”.	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 at the Commission Meeting on January 7, 2016, employee parking is capped at 9,045 spaces.
2	Draft Transportation Element	T.D.6	"Locate parking spaces for employees with ability impairments adjacent to building entrances and connect the spaces to the shortest accessible route."	<p>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.</p> <p>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.</p>

NIH Comments regarding NCPC Draft Transportation Element and Revisions to the Project Submission Guidelines

#	Document	Section or Page	NCPC Statements in revised documents	Comment
3	Draft Transportation Element	Addendum Pg. 4	“A Transportation Management Plan (TMP) will be required for any project anticipated to have transportation implications, including those resulting from a change in use, increase in federal employees or visitors travelling to a workplace or other destination, increase in parking, or physical alterations or improvements that cause circulation impacts. If a TMP is required, a draft is due at Preliminary Review. ”	<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>
4	Draft Transportation Element	Addendum Pg. 9	“NCPC requires tracking of certain transportation metrics on a biennial basis for all facilities with master plans or for projects that have transportation implications, including those that request a parking ratio deviation in accordance with the criteria outlined in the NCPC Submission Guidelines. At a minimum, facilities will be required to provide an updated mode split as part of this reporting process, as well as a status update on select TDM strategies that the Commission determines have the greatest potential to help a facility meet its transportation goals.”	NIH will meet its reporting commitments to NCPC as detailed in the TMP for the current Master Plan.

NIH Comments regarding NCPC Draft Transportation Element and Revisions to the Project Submission Guidelines

#	Document	Section or Page	NCPC Statements in revised documents	Comment
5	Rev Submission Guidelines Update 2019	16	Table 7: Criteria for Deviations from Parking Policies: Criterion 1: Agency mission requires that a majority of employees commute when multi-modal access is a challenge, such as times when transit is unavailable or bike/pedestrian travel is unsafe, work in overlapping shifts, or are not allowed to telework or use alternative work schedules.	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.
6	Rev Submission Guidelines Update 2019	16	Table 7: Criteria for Deviations from Parking Policies: Criterion 2: A lack of bicycle and pedestrian infrastructure makes access to the facility from transit stations a challenge, and local/regional plans do not anticipate area improvements to the bicycle/pedestrian network or an expansion of high-capacity transit access (i.e., BRT, LRT, rapid bus).	Expected area improvements do not become reality until funded and constructed. Consider allowing deviations from the parking ratio until the anticipated projects are operational.



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND WASHINGTON
1314 HARWOOD STREET SE
WASHINGTON NAVY YARD DC 20374-5018

Transportation Element and Submission Guidelines Update
Department of the Navy Comments

Transportation Element

Modified Parking Ratios: DoN 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.

Standardized Deviation Process: 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.

Criteria for Parking Deviations: 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).

Performance-Based Monitoring and Reporting: 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?

Mobility Options: 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.

T.B.5: Allowing public access through military installations poses a major security concern, and therefore is highly unlikely.

Submission Guidelines

Pg 54 5.4 The 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.



United States Department of the Interior

NATIONAL PARK SERVICE
Interior Region 1- National Capital Area
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

November 12, 2019

Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, N.W., Suite 500
Washington, D.C. 20004

Dear Mr. Acosta:

The National Park Service (NPS) has reviewed the draft Comprehensive Plan's Transportation Element and offer the following comments. This particular element of the comprehensive plan is important to federal agencies as it recognizes the importance of a multimodal system and the influential role the federal government plays in the region's transportation system.

The guiding principles within the draft Transportation Element are aligned with the NPS's goal to be a leader in the use of alternative transportation. The Element's emphasis on a multimodal transportation system is also aligned with the 2015 NPS Call to Action: to ensure safe and enjoyable physical connections from parks to a variety of sustainable transportation options.

The NPS is concerned with combining maintenance of federal parkways with other federal infrastructure as noted in T.A.12. Parkway and other federal assets are not equal. They should be separated and the language should 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.

There are several mentions throughout the element to small-scale transportation (policies T.B.1 and T.C.10). While emerging mobility options are quickly evolving, the industry has dubbed them micro-mobility rather than small-scale. This is a more apt description of the dockless transportation options.

The element references the Transportation Planning Board (TPB) and its importance related regional transportation planning. The element should also recognize that there are several federal agencies that participate as non-voting members the TPB.

The NPS appreciates the opportunity to review and comment on the Transportation Element. For further coordination on this please contact Tammy Stidham, Deputy Associate Area Director, Lands and Planning at (202) 619-7474 or tammy_stidham@nps.gov.

Sincerely,

Peter May
Associate Area Director
Lands and Planning

INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS,
NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT,
VIRGINIA, WEST VIRGINIA

Name: US General Services Administration/Marc Poling
Location: Washington, DC

We have two major comments to share:

1. 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.

2. 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.

Name: Smithsonian Institution/Ann Trowbridge
Location: Washington, DC

1. 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.

2. 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?

Name: United States Marine Corps/Darryl Griffin

Location: Quantico, Virginia

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.

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.

COMMENTS FROM LOCAL AND REGIONAL AGENCIES



November 12, 2019

Marcel Acosta
Executive Director
National Capital Planning Commission
401 9th Street, NW
Washington, DC 20004

RE: Federal Transportation Element of the Comprehensive Plan for the National Capital

Dear Mr. Acosta:

The District of Columbia Office of Planning (OP) and District Department of Transportation (DDOT) would like to thank you for the opportunity to review and comment on the proposed revisions to the Federal Transportation Element of the Comprehensive Plan for the National Capital (Federal Element). OP and DDOT are glad to collaborate with the National Capital Planning Commission (NCP) on development of policy for transportation projects that serve and provide access to federal facilities locally and in the region.

We appreciate the new references to resiliency, the Transportation Planning Board's (TPB) Equity Emphasis Areas, and the changing context of mobility in the Element, as well as the clarity with which the document is written. We strongly support the guiding principles for the revised document, including:

- Advancing an interconnected transportation system
- Creating a range of equitable mobility options
- Connecting transportation and land use
- Promoting efficient and sustainable transportation

DDOT and OP are committed to providing options for the movement of people in both the District of Columbia and the region by modes other than single occupancy vehicles (SOV). Providing strong policies that incentivize and prioritize transit usage, walking and biking, teleworking, and compressed work schedules are necessary to ensure the District and region continue to be a place where people choose to live, work, visit, or start a business.

We encourage NCP to retain policies from the 2016 Federal Element that prioritize telework and compressed schedules and that provide for the steady increase of transit subsidies for employees. While these are now proposed as goals within narrative sections of the Federal

Element, they do not carry the same weight and importance as policy. Specifically, we recommend that the following be reintegrated as policies rather than remain as narrative:

- *T.D.2: Maximize employee telecommuting strategies in accordance with federal law and agency telework policies.*
- *T.D.3: Employ compressed and alternative work schedules for employees, consistent with agency missions.*
- *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*
- *T.H.2: Support funding to increase capacity, security, and multi-modal development of the regional transit system.*

We also encourage NCPC to integrate policies into the Federal Element that recognize the importance of charging market rates for parking. Such policies can have a positive impact on reducing reliance on SOVs and on minimizing the amount of on-site vehicle parking spaces at federal sites while generating revenue from the available spaces. Providing a smaller supply of parking can also reduce the impacts on the transportation network serving a given site and surrounding communities in terms of traffic congestion, pedestrian safety, and environmental considerations.

DDOT recently completed an update to its *Guidance for Comprehensive Transportation Review (CTR Guidelines)* that established parking benchmarks by distance to transit. These were based on the District's goal of 75 percent non-auto travel for home-to-work trips contemplated in the 2019 District of Columbia Comprehensive Plan Framework Element as well as in moveDC, the District's Long-Range Transportation Plan. The new benchmarks encourage capping on-site parking at ratios near the lower end of the minimum level required by the 2016 DC Zoning Regulations, which recognize the District's robust transit network. Based on this reasoning, we strongly recommend that NCPC further reduce the amount of parking required by the Federal Element to ratios more closely aligned with the *CTR Guidelines*, particularly in the Regional Core and Transit Rich areas. 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:

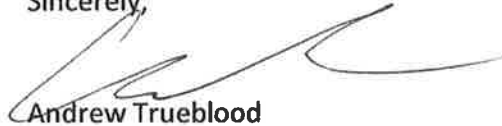
- *Regional Core: from the proposed 1 space per 5 employees to 1:8*
- *Transit Rich: from the proposed 1 space per 4 employees to 1:6*

These proposed changes are reflected in, and consistent with, the Public Review Draft Transportation Element of the District of Columbia Comprehensive Plan, which can be found here: <https://plandc.dc.gov/page/draft-comprehensive-plan-update>.

Thank you again for providing our agencies with the opportunity to weigh in on the proposed changes. We look forward to supporting NCPC staff, in any way necessary, to integrate these changes into the Federal Transportation Element. If you have any questions related to our recommendations, please reach out to Aaron Zimmerman, PTP, DDOT, via e-mail at

aaron.zimmerman@dc.gov or via telephone at (202) 671-2356 or Kristin Calkins, AICP, via e-mail at kristin.calkins@dc.gov or via telephone at (202) 442-8812.

Sincerely,



Andrew Trueblood

Director

District of Columbia Office of Planning



Jeff Marootian

Director

District Department of Transportation

cc: Sakina Khan, Deputy Director for Citywide Strategy and Analysis, OP
Jim Sebastian, Associate Director for Planning and Sustainability Division, DDOT
Rogelio Flores, OP, Associate Director for Citywide Planning
Anna Chamberlin, DDOT, Neighborhood Planning Manager

November 12, 2019

Jennifer Hirsch
National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington, DC 20004

Dear Ms. Hirsch,

Thank you for the opportunity to provide comments on the National Capital Planning Commission's (NCPC) Comprehensive Plan Transportation Element Update. Please accept these comments on behalf of the Arlington County Division of Transportation.

Comments regarding parking ratios:

1. 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):
 - a. For the regional core, 1:6-1:8 instead of NCPC's proposed 1:5
 - b. For transit rich areas, 1:5-1:6 instead of NCPC's proposed 1:4
 - c. For transit-accessible areas, 1:4-1:5 instead of NCPC's proposed 1:3
 - d. For suburban areas, 1:3 instead of NCPC's proposed 1:2
 - e. For outside of suburban areas, 1:2 instead of NCPC's proposed 1:1.5
2. 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."
3. 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 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.

Comments regarding other proposed policies:

In addition to the comments above regarding parking ratios, we have concerns about the following proposed 2019 Policies, as they are described in the October 7, 2019 Transportation Element Policy Comparison (Draft Release):

4. 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."
5. 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.
6. 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."
7. 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.
8. 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.
9. 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.

10. 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."
11. 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.
12. 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.
13. 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."
14. 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.
15. 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.
16. 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.

Thank you again for the opportunity to comment on this plan. We support the majority of the plan and appreciate the positive working relationship Arlington has with NCPC.

Sincerely yours,

Dan Malouff
Regional Transportation Planner
Arlington County Division of Transportation

November 20, 2019

Marcel Acosta, Executive Director
National Capital Planning Commission
401 9th Street, NW North Lobby, Suite 500
Washington, DC 20004

Re: National Capital Planning Commission
(NCPC) Comments

Dear Mr. Acosta:

Thank you for the opportunity to review the draft *Transportation Element and Addendum* for the *Comprehensive Plan* for the *National Capital Planning Commission* dated September 2019. The Prince George's County Planning Department of the Maryland-National Capital Park and Planning Commission (M-NCPPC) is in support of the proposed Transportation Element provided by the National Capital Planning Commission (NCPC).

The Transportation Element is a component of NCPC's Comprehensive Plan and is built upon the principles of reducing single-occupant vehicle (SOV) use, increasing public transit use, and promoting sustainability in transportation and development. This element aligns with the goals of the 2014 *Prince George's County General Plan (Plan Prince George's 2035)*, the County's Transit Vision Plan and the Transportation Action Guide for Urban Communities (TAGUC).

NCPC's goals and objectives include:

- Supporting efforts of local jurisdictions to design and implement new, expanded and innovative multimodal services that connect to the existing public transportation network and enhance first- and last-mile connectivity.
- Operating shuttles that provide access between public transit and federal destinations if adequate off-site transit service is not otherwise present.
- Supporting roadway improvements that incentivize carpooling and the use of low-emission vehicles, including the use of high-occupancy vehicle lanes that provide priority access for high-capacity transit providers.
- Limiting sprawl by supporting compact, transit-oriented development and locating federal workplaces within regional activity centers, which are the region's priority growth areas.

- Creating partnerships between federal agencies and local governments that incentivize housing options close to work and supporting both multimodal commuting and shorter commute times through federal facility location decisions.
- Designing parking facilities to support solutions that are compatible with adjacent uses and in a manner that can be adapted for another use should parking no longer be needed. Additionally, bike racks and bike lockers should be integrated to encourage multimodal travel.
- Developing integrated Transportation Demand Management programs as part of Transportation Management Plans to reduce impacts on regional congestion, improving environmental quality, and minimizing parking demands at federal destinations.
- Providing publicly accessible bicycle racks, bicycle sharing stations, and parking for vehicle-sharing services on federal land, where possible, or coordinating with local jurisdictions to provide them near federal facilities.

These are all crucial components to developing a truly multimodal transportation network and promoting sustainable transportation and development in the region. Therefore, M-NCPPC supports the Transportation Element of the National Capital Planning Commission's Comprehensive Plan.

Please contact Iftin Thompson at 301-952-3412 or at iftin.thompson@ppd.mncppc.org, if you have any questions or need additional information. Thank you for your time and attention to this matter.

Sincerely,



Andree Green Checkley
Planning Director

cc: Terry L. Bellamy, Director, DPW&T
Marion Brown, Special Assistant, DPW&T
Derick Berlage, Acting Deputy Director, Planning Department
Katina Shoulars, Acting Division Chief, Countywide Planning Division
Bryan Barnett-Woods, Planning Supervisor, Transportation Planning Section
Iftin Thompson, Senior Planner, Transportation Planning Section



November 12, 2019

National Capital Planning Commission (NCPC)
401 9th Street, NW, Suite 500N
Washington, DC 20004

Re: Comments on the Transportation Element of the Comprehensive Plan for
the National Capital

The Washington Metropolitan Area Transit Authority (Metro) offers the following comments on the Draft Release of the Transportation Element of the NCPC's Comprehensive Plan for the National Capital. Metro appreciates the opportunity to review the Draft Release of the Comprehensive Plan's Transportation Element developed by the NCPC. If you have any questions or require clarification on any responses, please contact Allison Davis by email at adavis5@wmata.com or by phone at (202) 962-2056.

Transportation Element and Metro

We commend NCPC for drafting a plan built on the principles of reducing single-occupant vehicle (SOV) use and increasing transit use, and sustainability. As noted in the Draft Release of the Transportation Element, the federal government is uniquely positioned to provide leadership on and support regional efforts to maintain and build the infrastructure for a robust transportation network and successfully connect land use and transportation, which can help stem the impacts of climate change. As such, Metro appreciates the Federal government's ongoing decision to locate federal offices near transit, and the myriad federal programs, planning policies, and incentives that encourage multimodal travel options. The plan's emphasis on improving transportation access, encouraging transportation land use connections, and promoting proactive transportation management planning will reduce congestion, increase energy conservation, and improve quality of life in the region.

**Washington
Metropolitan Area
Transit Authority**

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Below are specific comments about the various elements of the Transportation Element.

Section A: Advance an Interconnected Transportation System that Meets Regional Planning Goals and Objectives

Page 9, Regional Policy Framework and Agency Coordination: The second paragraph on page 9 states, "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.

Section A.1, page 9: Metro welcomes federal support for Metrorail and Metrobus capacity and service expansion; however, 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. Metro encourages the federal government to continue to lead the region and work with Metro and the local jurisdictions to pursue development around rail stations and on bus lines that have excess capacity. In 2012, a Memorandum of Understanding (MOU) was signed between Metro and the General Services Administration (GSA) to explore and possibly develop transit-oriented development projects anchored by a federal agency on one or more underutilized or vacant Metro parcels near rail stations. We appreciate the continued relationship with GSA and NCPC to turn these opportunities into reality.

Section A.1, pages 11-12: 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 guidelines¹. As noted in the Transportation Element, the federal government has a unique role in transportation planning in the region and should use that role to encourage the development of truly coordinated transit services that are seamlessly integrated and easy for customers to navigate and use.

¹ Increased coordination between regional and local transit agencies was a key recommendation coming out of the Bus Transformation Project. See the Bus Transformation Strategy and Recommendations Report for more information: https://bustransformationproject.com/wp-content/uploads/2019/09/Bus_Transformation_Strategy_and_Recommendations_2019-09-05.pdf?x30073

Section B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access throughout the Region

T.B.1,18,19: Metro supports implementation of new and innovative multimodal services that enhance first- and last-mile connectivity. As noted in the Transportation Element Workshop, Metro is currently developing policies related to some of these small-scale solutions to ensure that these new transportation options complement the existing transportation network and to reduce the potential for negative impacts. Metro also recognizes that Capital Bikeshare provides an important first- and last-mile connection for many customers and has worked with Capital Bikeshare to include stations on Metro property throughout the region.

T.B.2: Metro supports the Transportation Element's policy to ensure there is adequate infrastructure for bicycles and pedestrians to safely and efficiently travel to and from destinations. While new multimodal services are important to consider and plan for, walking remains the most equitable mobility option. 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."

T.B.6: 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.

T.B.6: 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.

Section B.2: 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.

T.B.15 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.

Section C: Connect Transportation and Land Use to Encourage Responsible Development Patterns

T.C.3,4: 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.

T.C.9: 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.

Section D: Promote Efficient and Sustainable Travel to Federal Destinations

Section D.2 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 NCPC to take a stronger role in this re-evaluation.

T.D.4: Metro supports the proposed adjustments to parking space-to-employee ratios. As noted in D.2 Workplace Parking, the availability of parking is perhaps the most important

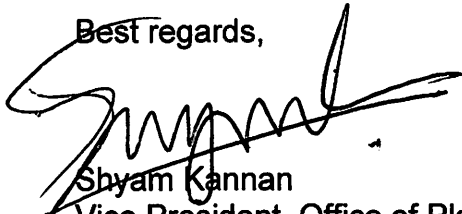
factor that influences how individuals commute. Inappropriate parking ratios and the resulting oversupply of parking directly undermines transit by facilitating more driving and detracting from the walkability of the area. Metro is therefore pleased that the draft plan calls for an update to these requirements based on industry best practices and regional transportation data.

Transportation Element – Addendum

Travel Patterns and Commuter Behavior, page 6: 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.”

Thank you again for the opportunity to comment on the draft Transportation Element.

Best regards,

A handwritten signature in black ink, appearing to read 'Shyam Kannan', written over the printed name and title.

Shyam Kannan
Vice President, Office of Planning

Name: Prince William County Department of Transportation/Paolo Belita

Location: Prince William County

Thank you for the opportunity to review the transportation element, which I was able to do in a little more detail. We have no additional comments. 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.

COMMENTS FROM INTERESTS GROUPS

Name: NoMa Business Improvement District

Location: Washington, DC

The following comments are submitted on behalf of the NoMa Business Improvement District (BID). Thank you for the opportunity to comment on the Draft Transportation Element.

Shuttle Buses:

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.

Monumental Core:

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.

Workplace Parking:

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.

Development on Federal Facilities:

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.

COMMENTS FROM INTERESTED INDIVIDUALS

Name: Doug Davies

Location: Washington DC

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.

Name: Jonathan Krall

Location: Alexandria, VA

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.

Name: Jo Ann Duplechin

Location: Washington, DC

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?

Name: Jeff Price

Location: Arlington, VA

Upon review of the transportation element document, there are statements that acknowledge the shifts in commuting.

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).
