



Executive Director's Recommendation

Commission Meeting: July 9, 2020

PROJECT Comprehensive Plan for the National Capital: Federal Elements – Amendments to the Transportation Element and Submission Guidelines Update	NCPC FILE NUMBER CP01A
SUBMITTED BY National Capital Planning Commission	NCPC MAP FILE NUMBER 00.00(00.00)45137
REVIEW AUTHORITY Preparation and Adoption of Federal Elements per 40 U.S.C. § 8721(a); and Project and Plan Review per 40 U.S.C. § 8711 (e)(2) and 8722(a)	APPLICANT'S REQUEST Adoption of the updated Transportation Element of the Comprehensive Plan for the National Capital: Federal Elements; and Adoption of the revised Submission Guidelines.
	PROPOSED ACTION Approve as requested
	ACTION ITEM TYPE Staff Presentation

PROJECT SUMMARY

Staff is requesting Commission adoption of the Transportation Element of the *Comprehensive Plan for the National Capital: Federal Elements* (Comprehensive Plan), Addendum, and Submission Guidelines, effective 60-days after the publication of the federal register. On September 5, 2019, the Commission released the draft element, addendum, and submission guidelines for a 60-day public comment period that closed on November 5, 2019. NCPC hosted a public open house and agency workshop to present the policies and received comments from federal agencies, local government agencies, interest groups, and individuals. Since then, the Element and submission guidelines has been revised to incorporate public input, guidance from stakeholder agencies, and minor text amendments for clarity purposes.

As part of the update, staff prepared a new Transportation Addendum, which is a resource that supports policies within the Transportation Element, articulates NCPC requirements for Transportation Demand Management and Transportation Plans, and explains key concepts. In addition, the NCPC Submission Guidelines were updated to help detail the information necessary from applicants to help inform staff analysis and Commission's decisions related to transportation and parking.

Modifications to the element, addendum, and submission guidelines have occurred since September 2019 to address comments and provide additional clarity within the documents. These modifications include revising the federal parking ratio in one of the geographic categories (L'Enfant City) to be more stringent following stakeholder feedback, supporting data, and studies. Additionally, revisions to the addendum provides greater detail regarding the transportation management plan monitoring and how it will apply across projects. Lastly, the submission guidelines include criterion for deviations related to a facility's parking requirements, which has been revised to clarify the requirements.

Following Commission adoption, staff will incorporate any changes as directed and complete minor editorial updates to the text and graphics to ensure document accuracy and consistency. In addition, NCPC staff will notify applicant agencies, regional partners, and the public of the new effective date of the Federal Transportation Element, Transportation Addendum, and Submission Guidelines.

KEY INFORMATION

- The Federal Transportation Element update will replace the 2016 Federal Transportation Element and policies.
- The 2016 Federal Transportation Element policies will remain in effect for 60-days after the publication of the Federal Register notice announcing the adoption of the revised Federal Transportation Element by the Commission.
- The element includes a Transportation Addendum that describes the Commission's requirements for Transportation Demand Management and Transportation Management Plans.
- New policy guidance incorporates the findings and recommendations of the 2017 *National Capital Region Federal Parking Study*.
- In response to comments and feedback, the Element incorporates revised Parking Ratio for the L'Enfant City (previously named Regional Core). The ratio will be one parking spot per every six employees at an agency within this boundary.
- The Element includes a new policy (T.D.11) which encourages agencies to consider how charging for parking, or treating agency provided parking as a taxable benefit to the extent permitted by law, can be utilized as a transportation demand management tool for meeting the updated parking ratios.
- The *Submission Guidelines* update will replace the 2016 *Submission Guidelines*.
- Staff is proposing modifications to the Commission's *Submission Guidelines* to align with the updated element and information included in the Transportation Addendum. The updates to the *Submission Guidelines* describe the process by which applicants may request a deviation from parking policies for individual projects, and outline when a Transportation Management Plan (TMP) is required.

RECOMMENDATION

The Commission:

Approves the final adoption of the updated Transportation Element of the *Comprehensive Plan for the National Capital: Federal Elements*, including the Addendum pursuant to 40 U.S.C. § 8721.

Approves the final adoption of the updated *Submission Guidelines* per 40 U.S.C. § 8711 (e)(2) and 8722(a).

Notes the 2016 Transportation Element policies will remain in effect for 60-days after the publication of the Federal Register notice announcing the adoption of the revised Transportation Element by the Commission.

Applicable to Individual Projects

Notes following the effective date, individual projects with previous Commission action under the 2016 policies will move forward using the 2016 Transportation Element policies, unless project approval has expired.

Applicable to Master Plans

Notes that many installations in the L'Enfant City already meet the 2016 parking ratios and should therefore prepare a new Transportation Management Plan in accordance with the 2020 parking ratios at the time of their next master plan update.

Notes the majority of installations in the region where the parking ratio is proposed to increase are working towards meeting their 2016 parking ratio per their Transportation Management Plan. At the next master plan update, such installations should build on their existing Transportation Management Plan and detail how the 2020 parking ratio goal can be met over additional time.

Notes that for projects with special and unusual circumstances, applicant agencies can consult with NCPC staff to determine the applicable Transportation Element policies.

Notes that, following adoption, NCPC staff will develop an online submission portal for the Transportation Management Plan monitoring program, anticipated for completion in fall 2020.

Notes the updated Submission Guidelines will be effective 60 days after the notice of final rulemaking is published in the Federal Register.

Notes following Commission adoption, staff will incorporate any changes as directed by the Commission and will complete minor editorial updates to the text and graphics to ensure document accuracy and consistency.

PROJECT REVIEW TIMELINE

Previous actions	2016 – Last Adoption of the Transportation Element 2017 – Acceptance of the <i>National Capital Region Federal Parking Study</i> 2019 – Authorized release of the draft Transportation Element, Addendum, and Submission Guidelines for 60-day public comment period.
Remaining actions (anticipated)	

PROJECT ANALYSIS

Executive Summary

The proposed Transportation Element consists of a goal statement, policies, and narrative, which provide background information to support the policies. Along with the element, staff prepared a Transportation Addendum to articulate the Commission's requirements for Transportation Demand Management and Transportation Management Plans (TMP). The full element including the addendum is attached as Appendix A.

Proposed changes to the NCPC Submission Guidelines (Appendix B) align with the updated element and the information included in the Transportation Addendum. The updates to the Submission Guidelines describe the process by which applicants may request a deviation from parking policies for individual projects and outline when a TMP is required. The update is proposed concurrently with the Transportation Element. A summary of the modification is included in the analysis that follows.

Analysis

Background

The Federal Transportation Element update considers the recommendations and findings of the *2017 National Capital Regional Federal Parking Study* (parking study), which was developed for NCPC by the U.S. Department of Transportation John A. Volpe National Transportation Systems Center (Volpe). The study recommended making NCPC's parking policies and processes more data-driven, standardized, and performance-based.

On September 5, 2019, the Commission released the draft Federal Transportation Element for a 60-day public review and comment period. NCPC accepted public comments on the draft Element through November 5, 2019. NCPC received comments from federal agencies, local governments agencies, interest groups, and individuals. Many of the comments were related to the parking ratio policy, transportation management plan monitoring, and the proposed deviation process. In response to these comments, staff has revised the final Transportation Element, Addendum, and Submission Guidelines as summarized below. A detailed Response to Comments is included as Appendix C.

Major Modifications from Draft to Final Element

Since the draft release, staff revised the Transportation Element, Transportation Addendum, and Submission Guidelines to address comments related to the parking ratio policy, charging for employee parking, transportation management plan monitoring and proposed deviation process. These changes are summarized below.

Transportation Element

Many of the public comments in the Transportation Element are centered within Section D: Promote Efficient and Sustainable Travel to Federal Destinations, with clarifying changes in the narratives and policies of the other sections.

Parking Ratio Policy

Revised policy **T.D.4** to raise the L'Enfant City, which was previously referred to as the "Regional Core" in the draft and revised for clarity, parking ratio from 1:5 to 1:6 in response to comments and feedback from local jurisdictions and federal agencies.

The federal government should:

T.D.4 *Meet the following zone-based parking space-to-employee ratios:*

Regional Core L'Enfant City: *In the L'Enfant City, the parking ratio should not exceed one space for every ~~fivesix~~ employees (1:5~~6~~). [~~8083~~ percent non-SOV mode share]*

Transit-Rich Corridors: In highly Metro-accessible portions of the Historic DC Boundary, the parking ratio should not exceed one space for every four employees (1:4). [75 percent non-SOV mode share]

Transit Accessible: For the remainder of the Historic DC Boundary Zone and suburban locations within 2,000 feet of a Metrorail station, the parking ratio should not exceed one space for every three employees (1:3). [66 percent non-SOV mode share]

Suburban Areas Beyond Metrorail: For all other locations in the region, including areas served by high-occupancy toll/high-occupancy vehicle lanes or high-frequency commuter rail, the parking ratio should not exceed one space for every two employees (1:2). [50 percent non-SOV mode share]

If a facility falls between two zones, the stricter parking ratio will be upheld.

After the release of the 2019 draft Element, NCPC received comments from District Department of Transportation (DDOT), District of Columbia Office of Planning (DCOP) and the City of Arlington to reduce the amount of parking allowed at federal facilities, specifically within the L'Enfant City and Transit Rich Corridors. Following the comments, NCPC conducted a study of existing parking at federal facilities within the L'Enfant City and the Transit Rich Corridors.

While staff's study was not comprehensive of all federal facilities within the L'Enfant City and Transit Rich Corridors, it did reveal that office buildings not on military installations or campuses had higher parking ratios (fewer parking spaces per employee) than those of the installations or campuses. This is due to a variety of reasons including campus planning and agency mission needs.

Facilities in the Transit Rich Corridors include the Pentagon, Joint Base Anacostia-Bolling, the National Zoo, Joint Base Myer-Henderson Hall, and St. Elizabeths West Campus. Assessment of these campus-type facilities/installations show generally lower parking ratios (more parking spaces per employee).¹ Therefore, it was determined that the 1:4 ratio for Transit Rich Corridors is already an aspirational, yet achievable goal for the affected facilities.

Many facilities in the L'Enfant City are not campuses and are able to meet higher parking ratios. The *Parking Study* confirms the L'Enfant City could support higher ratios based on the accessibility metrics outlined for a 2030 goal. Additionally, it is unlikely a new federal campus will be built within the L'Enfant City boundary, whereas it is very likely new federal office buildings will be constructed or renovated. Staff studied various strategies to address higher ratios in the L'Enfant City, including adding a new category of ratios to accommodate new office buildings, or a possible exemption for military uses. However, these alternatives left too much room for interpretation and additional exemptions.

In order to keep the policies data-driven, clear, concise, and best aligned with the local jurisdictions, staff recommends revising the parking policy ratio within the L'Enfant City from 1:5 to 1:6. Staff notes that there is already criteria in place that allows for parking deviations as outlined in Table 7 of the Submission Guidelines.

Pricing as a TDM Tool Policy

Comments from local jurisdictions and agency representatives shared that free workplace parking has been an impetus for single-occupant vehicle use, contributing to greenhouse gas emissions and traffic congestion and encouraged charging for employee parking. Though NCPC lacks the authority to address agency finances, staff agrees that charging for parking has a significant impact on overall SOV use and encourages the option as part of a Transportation Demand Management strategy to meet the parking ratios. In response to comments, staff added a new policy **T.D.11** to Section D.2 Workplace Parking, to consider charging employees for agency provided parking or treating agency provided parking as a taxable benefit to the extent permitted by law as a transportation demand management tool to achieve parking ratios and lower the use of single-occupancy vehicles. Policies in D.3 Visitor Parking have been updated to reflect this change.

The federal government should:

T.D.11 Consider charging employees for agency provided parking or treating agency provided parking as a taxable benefit to the extent permitted by law as a transportation demand management tool to reduce overall single-occupancy vehicles travel.

¹ Excludes the National Zoo, as its parking is primarily for visitors.

Transportation Element Addendum

One of the recommendations in the parking study was to strengthen the effectiveness of the Commission's parking and transportation policies by introducing regular, performance-based monitoring. The parking study recommended that NCPC collect data on a regular basis to evaluate how federal facilities are progressing towards meeting parking ratios and the goals defined in TMP.

Based on this recommendation, the Federal Transportation Element Addendum introduced an addition to the existing "monitoring and evaluation" component of a TMP. While facilities currently evaluate transportation strategy performance, NCPC will now ask agencies to provide this information to staff on a biennial basis. NCPC staff will request applicant agencies to complete a short series of questions, providing a status update on mode splits and select transportation demand management strategies. NCPC intends this effort to be simple and not time-consuming for agencies.

Transportation Management Plan Monitoring

NCPC staff revised language in the Addendum in response to comments and feedback from local jurisdictions and federal agencies to ensure clarity of the monitoring questions and requests; ensure the request for data will not be onerous; and to clarify that NCPC will be responsible for outreach to an agency for the monitoring data.

NCPC encourages agencies to consider, as a transportation demand management tool, charging for agency provided parking, or treating agency provided parking as a taxable benefit to the extent permitted by law. In addition to the new policy T.D.11 as discussed on page 7; this concept was added as a new call-out box with supporting language in the narrative of the Addendum. Though NCPC lacks the authority to address agency finances, staff agrees that charging for parking has a significant impact on overall SOV use. While implementing this strategy is dependent upon an agency's authority, it can be an effective tool in changing travel behavior. It can also be an effective way to reduce parking and use land occupied by parking facilities for other mission needs.

Pricing as a TDM Tool

Charging for agency provided parking is a transportation demand management strategy to help reduce parking demand to achieve parking ratio goals. While implementing this strategy is dependent upon an agency's authority, it can be an effective tool in changing travel behavior, reducing parking, and reusing land occupied by parking facilities for other mission needs. The Transportation Element encourages agencies to consider as a transportation management tool charging employees for agency provided parking spaces or treating agency provided parking as a taxable benefit to the extent permitted by law.

Submission Guidelines

Along with the set of revised employee parking policies, the parking study recommended that NCPC consider adopting a standardized process for evaluating deviations from the established parking ratios for federal facilities. In the past, the Commission has received and granted requests to deviate from the established parking policies based on a range of external factors related to transportation and access. With the update of the Transportation Element, staff has determined that a clear and predictable process for allowing such deviations from the parking ratio could assist both applicant and staff to navigate the approval process more effectively. Modifications from draft have included minor revisions for clarity purposes.

Proposed Deviation Criteria

Revised Criteria 3 & 4 of Table 7: Criteria for Parking Deviations for clarifying purposes and in response to comments received from federal agencies:

Deviation Criterion 3:

The distance from the nearest major transit stop to core work areas exceeds a half mile **measured on pedestrian infrastructure**, or an approximately 10-minute walk. This should include any distance traveled across an installation or campus to worksite for employees.

Deviation Criterion 4:

Commute times via public transportation versus personal vehicle are a hardship for a majority of the employees at a particular facility. For example, is the average **one-way** commute for more employees via public transportation exceeds 1.5 hours, but the average drive time is 30 minutes, a deviation may be considered.

Several agencies questioned why the deviations would not be granted for master plans and transportation management plans. These plans are intended to be long-term documents that consider a 20-year planning horizon. Master plans consider the long-term commitment of regional infrastructure projects that would help agencies meet their parking ratio goals. Applicants can seek relief from the parking ratios for individual projects since it is a point in time to consider current conditions and whether regional infrastructure projects have been funded. At this point, the conditions would be factored in as they relate to the proposed project to inform potential deviation from the parking ratios. Accordingly, staff does not believe it is appropriate to grant deviations from the established parking ratio for a facility at the master plan level, particularly with parking ratios that are better tied to future accessibility. Instead, deviations may be considered for specific projects when submitted for individual review by the Commission.

Implementing New Parking Ratios

The Submission Guideline now includes language in Chapter 3 Master Plan Submission Guidelines on when parking ratios would be implemented. In determining how the new parking ratios would be implemented, staff has concluded that many installations in the L'Enfant City already meet the 2016 parking ratios, and should therefore prepare a new Transportation Management Plan in accordance with the 2020 parking ratios at the time of their next master plan update. In regard to areas outside the L'Enfant City, the majority of installations in the region where the parking ratio is proposed to increase are working

towards meeting their 2016 parking ratio per their Transportation Management Plan. At the next master plan update, such installations should build upon their existing Transportation Management Plan and detail how the 2020 parking ratio goal can be met over additional time.

Recommendation Summary

The Executive Director recommends that the Commission approve the final policies in the Federal Transportation Element of the Comprehensive Plan (See Appendix D) and Submission Guidelines and recommends the proposed policies take effect 60-days after the publication of the Federal Register notice announcing the adoption of the revised Federal Transportation Element and Submission Guidelines by the Commission.

Staff notes that projects with previous Commission action under the old policies will move forward using the 2016 Transportation Element policies or as identified in the Commission approved Master Plan. In addition, staff notes that projects with special and unusual circumstances should consult with NCPC staff to determine the applicable Transportation Element policies. Regarding Master Plans, agencies should plan to meet the new parking ratios at the time of a master plan update, and should refer to the Submission Guidelines for more information.

In addition, staff notes that following adoption, NCPC will develop an online submission portal for the Transportation Management Plan monitoring program, anticipated for completion in fall 2020.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The updates to the Federal Elements of the Comprehensive Plan are provided in accordance with the provisions of the preparation and adoption of Federal Elements of the Comprehensive Plan specified at 40 U.S.C. § 8721.

The Submission Guidelines are necessary for evaluating development within the National Capital Region for consistency with the policies set forth in the Federal Elements of the *Comprehensive Plan*. The proposed revisions to the Guidelines are consistent with the revised Transportation Element currently under consideration.

National Historic Preservation Act

This proposal does not sustain characteristics as a federal undertaking. The proposal of policy revision does not implement, contract, or take other actions that would preclude consideration of the full range of alternatives to avoid or minimize harm to federal historic properties. Consequently, the proposed action does not require review pursuant to the National Historic Preservation Act, Section 106 process.

National Environmental Policy Act

Staff reviewed the proposal in accordance with NCPC's implementation of the National Environmental Policy Act and determined that the update to the Transportation Element can be categorically excluded from further environmental analysis and documentation. The action is determined by the staff to qualify as NCPC's Categorical Exclusion: (4) Adoption of a Federal Element of the Comprehensive Plan or amendment thereto or broad-based policy or feasibility plans prepared and adopted by the Commission in response to the Comprehensive Plan.

NCPC has an obligation to satisfy the National Environmental Policy Act (NEPA) when approving projects. NEPA procedures are coordinated through the *Submission Guidelines* and the project review process. As such, changes to the Guidelines do not require NEPA review.

CONSULTATION

Following the public comment period and subsequent studies, NCPC staff consulted with staff representatives from the John A. Volpe National Transportation Systems Center, the U.S. General Services Administration, the Department of the Navy, the U.S. Department of Defense, the District Department of Transportation, and the District of Columbia Office of Planning to discuss possible revisions to the federal parking ratio policies. These conversations were held to best understand limitations on varied federal facilities, existing local jurisdiction regulations, and to work towards better policy alignment between federal and local parking standards.

Staff consulted with multiple agencies to discuss the proposed parking ratio policy change in the L'Enfant City. In general, agencies were supportive of the change. It was also determined in these conversations that the transportation management plan monitoring will help facilities establish better baselines to create realistic goals to achieve the outlined parking ratios.

ONLINE REFERENCE

The documents will be available online for public comment, following Commission action:
<https://www.ncpc.gov/initiatives/transportation>.

Appendices

- Appendix A – *Final* Transportation Element, including the Transportation Addendum
- Appendix B.1 – *Final* Revisions to the Submission Guidelines
- Appendix B.2 – *Mark-up version* of the Submission Guidelines
- Appendix C – Response to Public Comments
- Appendix D – Policy Summary

#	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.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
5	<p>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.</p>	<p align="center">Naval Facilities Engineering Command (NAVFAC)</p>	<p align="center">11/18/2019</p>	<p align="center">Addendum</p>	<p align="center">-</p>	<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	<p>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).</p>	<p align="center">Naval Facilities Engineering Command (NAVFAC)</p>	<p align="center">11/18/2019</p>	<p align="center">Submission Guidelines</p>	<p align="center">-</p>	<p>Revised Criterion 3 to include new language that reflects the measured distance on pedestrian infrastructure.</p>

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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 NCPD 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	-	NCPD will release the draft Antenna Guidelines for public comment at the July 2020 Commission meeting, which will, among other things, clarify the review timeline.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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>

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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 NCPCs 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.

#	Comment	Agency/ Commenter	Date Received	Section	Policy #	Response to Comments
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>

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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> <ul style="list-style-type: none"> 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 	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>

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
50	<p>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.</p>	<p align="center">Washington Metro Area Transit Authority (WMATA)</p>	<p align="center">11/6/2019</p>	<p align="center">C: Connect Transportation and Land Use to Encourage Responsible Development Patterns</p>		<p>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.</p>
51	<p>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.</p>	<p align="center">Washington Metro Area Transit Authority (WMATA)</p>	<p align="center">11/6/2019</p>	<p align="center">C: Connect Transportation and Land Use to Encourage Responsible Development Patterns</p>	<p align="center">-</p>	<p>Thank you for this comment. As all federal projects are required to comply with NEPA regulations, which would account for these issues.</p>

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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 NCPD 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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
57	<p>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.</p>	<p align="center">NoMA Business Improvement District</p>		<p align="center">D: Promote Efficient and Sustainable Travel to Federal Destinations</p>	-	<p>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.</p>
58	<p>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.</p>	<p align="center">NoMA Business Improvement District</p>		<p align="center">C: Connect Transportation and Land Use to Encourage Responsible Development Patterns</p>		<p>Policy T.C.8 addresses this comment, as well as the Urban Design Element.</p>
59	<p>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.</p>	<p align="center">Doug Davies Washington, DC</p>	-	-	-	<p>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.</p>

#	Comment	Agency/Commenter	Date Received	Section	Policy #	Response to Comments
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.

Comprehensive Plan for the National Capital:

Transportation Element

Policy Summary

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

A.1 Regional Policy Framework and Agency Coordination

The federal government should:

- T.A.1** Support the development of a comprehensive and connected transportation system that meets land use, environmental, and economic goals articulated in regional plans and policies.
- T.A.2** Support capacity and service expansion of regional and local transit services, including Metrorail and Bus Rapid Transit, to increase access to public transportation and federal destinations.
- T.A.3** Work with transit providers to ensure that stations are accessible with informational signage and equipped to accommodate a range of travel options by providing parking for car-sharing services, amenities for bicyclists and pedestrians, and curb space for shuttles, circulators, and ride-hailing services.
- T.A.4** Support expanded levels of service for regional commuter rail between the District of Columbia, Maryland, and Virginia.
- T.A.5** Support the expansion of high speed and high capacity passenger rail to improve inter-city connectivity across the eastern United States, with Washington Union Station as a regional hub.
- T.A.6** Consider regional transportation and land use objectives and potential impacts to natural and cultural resources when evaluating transportation projects that would improve travel.
- T.A.7** Work with relevant agencies and other stakeholders to promote bicycling and establish a connected regional bicycle network.
- T.A. 8** Coordinate with regional and local agencies to develop an integrated system of bicycle and pedestrian trails that provide connections throughout the region, including to and from federal destinations.
- T.A.9** Coordinate with regional and local agencies to ensure that trail connections and rules in areas with multiple jurisdictional boundaries are clear to users and result in seamless transitions.
- T.A.10** Work with stakeholders to develop strategies to manage tour bus and commuter bus operations and parking to minimize negative impacts on circulation, parks, viewsheds, and cultural resources.

A.2 Management and Maintenance of Federal Transportation Assets

The federal government should:

- T.A.11** Support the maintenance and improvement of existing transportation infrastructure, with a priority on multimodal transportation corridors that support transit, pedestrian, and bicycle use.
- T.A.12** Support efforts to prioritize transportation funding towards maintenance of federal infrastructure that function as part of the regional commuter system.
- T.A.13** Support improvements that increase safety and reliability and preserves the historic character and cultural and national significance of the parkways.
- T.A.14** Coordinate with local, federal, and other stakeholders to accommodate safety improvements consistent with industry standards in a manner that minimizes impacts on natural and cultural resources.

A.3 Resiliency in Transportation Planning

The federal government should:

- T.A.15** Support regional efforts to manage transportation infrastructure in response to states of emergency.
- T.A.16** Support efforts to understand hazards and threats to transportation infrastructure and identify mitigation strategies to ensure system reliability.
- T.A.17** Consider asset resilience to natural events or man-made hazards when designing, locating or improving transportation infrastructure. Utilize industry best practices when selecting appropriate materials, and ensure that any increased maintenance requirements are reflected in life-cycle costs.

Guiding Principle B: Integrate a Range of Equitable Mobility Options to Improve Transportation Access Throughout the Region

B.1 Expansion of Mobility Options

The federal government should:

- T.B.1** Support 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, including supplemental transit services and micro-mobility solutions like dockless bikes and scooters.
- T.B.2** Work with local jurisdictions to ensure that there is adequate infrastructure for bicycles and pedestrians to safely and efficiently travel to and from federal destinations, including usable sidewalks, enough lighting, protected bike lanes, and multiuse trails, as appropriate.

- T.B.3** Provide secure bicycle parking spaces or bicycle lockers in close proximity to federal building entrances and in convenient locations throughout federal campuses, such as in parking facilities and at transit centers.
- T.B.4** Coordinate with local and regional bike sharing programs to expand service at federal facilities to provide a flexible, comprehensive, and efficient bike sharing network.
- T.B.5** Find opportunities to allow regional and neighborhood trail access across federal land, working with federal security staff to determine appropriate access points, pathways, and hours of operation.
- T.B.6** Operate shuttles that provide access between transit and federal destinations if adequate off-site transit service is not otherwise present. When providing access to federal campuses, such shuttles should also provide on-campus circulation between buildings. Any shuttle system should include waiting facilities with shelters and benches and adequate wayfinding signage. Shuttle services should be coordinated among federal agencies with overlapping route requirements to minimize costs and improve service.
- T.B.7** Operate cross-town shuttles in urban areas with limited local service to provide transit between federal agencies that regularly do business with one another, or among multiple agency office locations.
- T.B.8** Provide publicly accessible bicycle racks, bicycle sharing stations, and parking for vehicle-sharing services on federal land, where possible, or coordinate with local jurisdictions to provide them near federal facilities.
- T.B.9** Support roadway improvements that prioritize 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.

B.2 Transportation Equity

The federal government should:

- T.B.10** Establish a multimodal transportation network that supports a range of mobility options accessible to users of all incomes and abilities.
- T.B.11** Support the extension or improvement of the public transportation system's service area into developed, but underserved, areas of the region.
- T.B.12** Minimize negative impacts of transportation infrastructure projects on minority and low-income communities.
- T.B.13** Support federal and local government efforts to remove or deck freeways and other transportation infrastructure that create barriers to physical access throughout the region, particularly in communities that have been disproportionately impacted by transportation infrastructure.
- T.B.14** Work with local jurisdictions to improve the accessibility between the regional transit system and federal properties for all users through accessible pathways, sidewalks, streets, and curb ramps.

B.3 Emerging Transportation Modes

The federal government should:

- T.B.15** Support expansion of the water taxi system to provide an alternative commuting mode and access to waterfront attractions and employment centers. Coordination with federal entities to address security, mission requirements, transportation connectivity, and land use issues is critical.
- T.B.16** Coordinate with regional transportation agencies and providers of emerging transportation technologies to ensure that these services improve regional travel and reduce reliance on single-occupancy vehicles, and address negative impacts.
- T.B.17** Consider providing dedicated curb and public space within the right-of-way to accommodate beneficial transportation uses, as appropriate.
- T.B.18** Provide designated pickup/drop-off locations for ride-hailing services at or near federal destinations to reduce parking demand, improve traffic circulation, and minimize conflicts with other travel modes.
- T.B.19** Encourage collaboration between federal agencies and local government sponsors of dockless mobility programs to enhance multimodal access to and through federal properties while reducing the potential for negative impacts, such as physical and visual clutter.

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

C.1 Regional Transit-Oriented Development

The federal government should:

- T.C.1** Create partnerships between federal agencies and local governments that incentivize housing options close to work, support multimodal commuting, and support shorter commute times through federal facility location decisions.
- T.C.2** Support efforts to provide a range of housing types for a variety of income levels along major transportation corridors.
- T.C.3** Support compact development patterns at or adjacent to Metrorail stations, other transit centers, or multimodal corridors that maximize access to transit services for federal workers and visitors.
- T.C.4** Encourage the development of, and access to, intermodal transit centers within highly developed areas and regional activity centers to maximize transit use and provide improved connectivity for all users.

C.2 Development on Federal Facilities

The federal government should:

- T.C.5** Maximize opportunities to locate workplaces, cultural sites, or other destinations adjacent to multimodal corridors and prioritize transit-accessible locations, where possible.

- T.C.6** Provide access and connections through federal campuses/workplaces to the local and regional transportation system, as appropriate, and minimize disruptions that result from security measures.
- T.C.7** Ensure transportation improvements are compatible with the existing transportation network and available services in the surrounding area.
- T.C.8** Consider the surrounding context, including location in historic districts, view corridors, or any applicable design guidelines, in determining the design, layout, scale, and materials of streetscape features.
- T.C.9** Assess impacts of development projects on the transportation system and provide mitigation to ensure that the system functions adequately when projects are completed, with an emphasis on multimodal solutions.
- T.C.10** Provide a system of dedicated, inter-connected trails, protected bike lanes, and sidewalks, for pedestrians and other micro-mobility options, among federal campus entrance points and all on-site buildings.
- T.C.11** Integrate green infrastructure measures into transportation projects to meet sustainability goals.
- T.C.12** Encourage compact development and connected walking, bicycle, shuttle/transit infrastructure and wayfinding on federal campuses so users can easily and comfortably travel between on-site destinations.
- T.C.13** Prioritize parking structures over surface parking. Encourage parking structures to be located below ground, in the interest of efficient land use and good urban design.
- T.C.14** Encourage surface parking lots to be designed in an environmentally sensitive manner using features such as permeable pavers, bioswales, green roofs over covered parking, and/or solar panels.
- T.C.15** Encourage parking structure design to be sensitive to the surrounding context and provide opportunities for integrating other uses or adaptable reuse, where possible.
- T.C.16** Encourage that surface parking lots, when no longer needed, are removed, converted to open space, or used for proposed development.
- T.C.17** Locate parking facilities so they do not obstruct pedestrian or bicycle access to buildings and minimize their visibility from surrounding public rights-of-way.
- T.C.18** Consolidate parking facility access to minimize curb cuts where possible.

C.3 Multimodal Corridors in the Monumental Core

The federal government should:

- T.C.19** Support the development of multimodal corridors that respect the character of monumental core streets that provide safe, convenient, and equitable mobility options.
- T.C.20** Ensure that monumental core streets function as multimodal transportation corridors while allowing flexibility to accommodate special events and gatherings.
- T.C.21** Support efforts to reconfigure travel lanes within the right-of-way to balance multimodal travel including reduction in travel lane widths and large curb radii, where possible.

Guiding Principle D: Promote Efficient and Sustainable Travel to Federal Destinations

D.1 Transportation Management Plans

The federal government should:

- T.D.1** Prepare Transportation Management Plans for federal facilities that encourage a multimodal transportation system that meets the needs of workers, residents, and visitors, while improving regional mobility, transportation access, and environmental quality. TMPs should be used as ongoing guidance documents over the term of the plan, particularly to help agencies meet NCPC parking ratio policies and reduce SOV travel.
- T.D.2** Develop an integrated Transportation Demand Management program as part of Transportation Management Plans to reduce impacts on regional congestion, improve environmental quality, and minimize parking demand at federal destinations.
- T.D.3** Continue to monitor existing transportation demand management programs and transportation metrics, including the commute mode split for the facility.

D.2 Workplace Parking

The federal government should:

- T.D.4** Meet the following zone-based (refer to maps in Element) parking space-to-employee ratios:
 - L'Enfant City:** In the L'Enfant City, the parking ratio should not exceed one space for every six employees (1:6). *[83 percent non-SOV mode share]*
 - Transit-Rich Corridors:** In highly Metro-accessible portions of the Historic DC Boundary, the parking ratio should not exceed one space for every four employees (1:4). *[75 percent non-SOV mode share]*
 - Transit Accessible:** For the remainder of the Historic DC Boundary Zone and suburban locations within 2,000 feet of a Metrorail station, the parking ratio should not exceed one space for every three employees (1:3). *[66 percent non-SOV mode share]*
 - Suburban Areas Beyond Metrorail:** For all other locations in the region, including areas served by high-occupancy toll/high-occupancy vehicle lanes or high-frequency commuter rail, the parking ratio should not exceed one space for every two employees (1:2). *[50 percent non-SOV mode share]*

If a facility falls between two zones, the stricter parking ratio will be upheld.
- T.D.5** Provide priority parking spaces in convenient locations for high-occupancy and energy-efficient vehicles to improve sustainability.
- T.D.6** In accordance with federal law, locate dedicated parking spaces for employees with ability impairments in locations that connect to the shortest accessible route to building entrances.

- T.D.7** Limit parking for temporary users conducting official business at a given federal workplace. These spaces shall be exempted from the installation's employee/parking ratio as specific in Policy T.D.4. Visitor destinations with more substantial parking needs should refer to Section D.3 for applicable parking policies.
- T.D.8** Provide limited parking spaces for fleet or operational vehicles as needed to meet mission requirements. These spaces shall be exempted from the installation's employee/parking ratio as specified in Policy T.D.4.
- T.D.9** Consider leasing existing parking near federal facilities to meet parking needs before building new parking at a facility. These spaces shall not be exempted from the installation's employee/parking ratio as specified in Policy T.D.4.
- T.D.10** Minimize adverse impacts of transportation decisions on adjacent communities including spillover parking and congestion.
- T.D.11** Consider charging employees for agency provided parking or treating agency provided parking as a taxable benefit to the extent permitted by law as a transportation demand tool to reduce overall single-occupancy vehicle travel.

D.3 Visitor Parking

The federal government should:

- T.D.12** Consult the parking policies of local jurisdictions to determine appropriate parking standards for non-workplace federal uses, including residential, commercial, and institutional uses. Absent clear local guidance, the federal government should determine appropriate parking ratios consistent with other comparable regional standards or industry best practices.
- T.D.13** Consider a range of transportation management techniques to enhance multimodal access to visitor destinations before expanding parking, particularly for destinations in more isolated areas of the region. Such strategies may include improved multiuse trail connections, bus facilities, and sidewalks, along with improved pedestrian wayfinding.
- T.D.14** Evaluate current parking conditions at visitor destinations, as well as projected parking demand related to any anticipated plans and projects, to demonstrate the need for expanded parking facilities. Such studies should include an assessment of parking congestion, turnover rates, and any impacts to resource conditions or the visitor experience.