

Letter to Transportation Planning Board re Visualize 2045 plan

Coalition for Smarter Growth, + _____ + _____ ...

February 13, 2023

TPB Chair, Hon. Reuben Collins

National Capital Region Transportation Planning Board

777 North Capitol Street NE, Suite 300

Washington, DC 20002-4239

Dear TPB Chair Collins and Board members,

The following comments are provided by XX regional organizations that are concerned with the direction the Visualize 2050 update is going.

- This Visualize 2050 process is the last opportunity to make meaningful policy and projects changes in the long-range plan that can help the region attain urgent 2030 climate and equity commitments; and
- The TPB Board in 2021 likewise recognized this and took the extraordinary step to call for immediately starting over after the 2022 long-range plan was adopted, with the purpose of achieving a significant change from the status quo; however,
- The process proposed by TPB staff thus far provides little substantive change.

Thus, we respectfully ask the TPB to:

1. Restore to the Technical Inputs Solicitation the clear direction that the Board *requires* members to prioritize projects supporting key regional policy goals;
2. Clarify the Zero-Based Budgeting process descriptions and FAQs to better reflect this requirement and key findings of TPB's Climate Change Mitigation Study. For example, staff FAQ #6 omits critical information regarding the connection between road expansion, induced demand, vehicle miles traveled and emissions;
3. Broaden the scope of projects subject to the Zero-Based Budgeting process to reflect the intention of TPB's Board. As proposed by staff, only 1 in 5 projects would be subject to review under the ZBB process, and even a number of projects not completed as far out as 2040 would be exempt; and
4. Commit as local jurisdictional members to conduct advertised '_____ guide your localities' development of project submissions for V_____ applaud the TPB's collection of comments received on its website during the project

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solicitation stage. But this process also needs proactive advertisement and public meetings directly with the local and state agencies and local elected bodies who will make critical project decisions between now and June.

Further details on these recommendations are included in the following pages.

Thank you for your consideration,

PLEASE SCROLL DOWN TO FILL OUT THE FORM BELOW THE ATTACHMENT

Attachment

Specific comments on the proposed Visualize 2050 Project Solicitation documents and Zero-based Budgeting Process:

1) Restore to the Technical Inputs Solicitation the clear direction that the Board *requires* members to prioritize projects supporting key regional policy goals

The proposed Technical Inputs Solicitation *weakens* rather than *strengthens* the expectation adopted by the TPB Board that projects support adopted regional policies. We ask TPB to restore the clear and direct policy language.

The TPB Board voted to include the following statement in the 2021 Visualize 2045 Technical Inputs Solicitation:

"TPB requires its member agencies to prioritize investments on projects, programs, and policies to reduce greenhouse gas emissions, prioritize the aspirational strategies, and achieve COG's land use and equity goals as they submit their inputs for inclusion in the TPB's LRTP and TIP."

– TPB Board Adopted Technical Inputs Solicitation, January 2021

The new staff draft removed this clear direction and replaced it with the following statements, replacing "requires to prioritize" with "enable to reflect" and "should review and consider":

"...the intent [of the zero-based budgeting approach] is to enable the submissions to better reflect TPB planning priorities, to be more aligned with the TPB's policy framework, be more reflective of TPB scenario findings, and be more responsive to other findings from related TPB analysis. Documents that the TPB sponsoring agencies should review and consider prior to resubmitting their technical inputs are described and linked in this document." p. 2

- *"The TPB Synthesized Policy Framework and the TPB Summary of Scenario Studies Findings will be considered part of the TPB's Technical Inputs Solicitation for the Visualize 2050. These documents are expected to be used by TPB member agencies to develop inputs for Visualize 2050. Additionally, the TPB produces other analysis and information that should also be considered..." p. 3,*
- *– Proposed Draft Technical Inputs Solicitation, January 2023*

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Please retain the clear statement adopted by the TPB Board for the Jan. 2021 solicitation guide.

2) Clarify the Zero-Based Budgeting process descriptions and FAQs to better reflect this requirement and key findings of TPB's Climate Change Mitigation Study. For example, staff FAQ #6 omits critical information regarding induced demand, vehicle miles traveled and emissions;

2A. The Zero-based budgeting approach needs to elaborate how project submissions will be reviewed by TPB and the minimum information standards that project sponsors must meet in responding to questions regarding their project consistency with regional policies.

With regard to demonstrating support for regional policies, we have not yet heard how the zero-based budgeting approach proposed by staff is substantively different from the Visualize 2045 process two years ago. In response to Technical Committee member agency questions on what the Solicitation document "should review and consider" statement means, TPB staff responded that while member agencies are being encouraged to review the policy summaries, in practice there is no requirement to answer the policy consistency questions differently, that member agencies could, if they so desired, copy and resubmit their policy consistency responses from two years ago.

We do not believe that this process is what the TPB board had in mind when it called for a special update to the long-range plan to make significant changes to help meet urgent policy needs in climate change, safety and equity.

We ask TPB at a minimum to make this simple clarifying change to the FAQ document #5:

*"The agency submitting the project for inclusion in Visualize 2050 can **must** use a variety of supporting studies, analysis, and/or technically reasonable assumptions in responding to the policy questions.*

2.B The FAQ document further weakens the connection between TPB's climate change goal and project consistency, going out of its way to point out that not all roadway capacity adding projects increase GHG emissions, while failing to note that studies show that in aggregate, these projects do just that.

The draft FAQ document states:

"6. ... it would be incorrect to generalize that all roadway capacity adding projects will increase emissions. For example, vehicles operating at low/congested speeds emits higher number of certain pollutants; they also consume more fossil fuel, which results in higher levels of GHG emissions. Improvements to relieve such congested travel can help to reduce emissions."

This FAQ #6 needs to include the important context that highway and expansions typically induce more driving and result in [overall more G](#)

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This document should also note that TPB's Climate Change Mitigation Study found that the region must reduce per capita passenger vehicle miles traveled by 20% by 2030 – in addition to meeting TPB's electric vehicle adoption goal – to meet the minimum on-road emissions reductions in the COG 2030 Climate and Energy Action Plan.

2.C We are glad to see these clear statements in the FAQs and hope they are retained in the final version:

"3. ...A zero-based budgeting approach will help focus efforts on projects that are in a developmental stage where the TPB goals and priorities can be used to influence the scope of such projects, including dropping them from further consideration if they do not meet TPB goals and objectives."

"4. ...The set of projects under construction OR have funding would be exempt from TPB member agencies re-examining the decision to implement these projects. This does not preclude the TPB member agency from a re-examination and subsequent change to the project. Member agencies will be asked to re-examine the need, scope, and plans to implement the remaining projects that are not under construction and have no funds expended and to propose changes as appropriate."

3) Broaden the scope of projects subject to the Zero-Based Budgeting process to reflect the intention of TPB's Board. As proposed by staff, only 1 in 5 projects would be subject to review under the ZBB process, and even a number of projects not completed as far out as 2040 would be exempt.

The TPB Feb. 3 staff memo describes the ZBB Funded/Committed List as comprising only "projects that are active, under construction, or have dedicated funding in the near future."

However, the large majority of projects, 4 out of 5, are considered Funded/Committed by TPB staff in their draft classification of projects. This staff list of "active" or "short-term" projects includes a number of projects with completion dates as far out as 2040. We do not believe only including 1 in 5 projects meets the intent of the TPB board's direction to do Zero-Based Budgeting.

We ask for a much broader list of projects to be required to go through the ZBB process. While we still wait for clarification from staff on how it devised its draft lists, we ask for a new draft list of Developmental/Non-Exempt projects that includes:

- All projects not in the TIP;
- Projects in the TIP but without activity during the six-year period; and
- Projects with no construction funding.

4) Require local jurisdictions to conduct advertised public meetings to guide their development of project submissions for Visualize 2050.

We applaud the TPB's collection of comments received on its website during the project solicitation stage. But this process also needs proactive advertisement meetings directly with the local and state agencies and local elected officials to make critical project decisions between now and June.

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