

Eastgate MTP Update – USDOT Comments

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FHWA

General: Eastgate needs to provide more than simply defining concepts. They need to provide more detailed information and analysis results for the Eastgate area. Place information shown in the graphics into text and summarize or cite the graphics and how they clarify the information being provided in the document. We need to know what is happening in the Eastgate planning area – details about the transportation elements – both now and in the future and how these factors tie into the planning process. It is recommended to expand the discussions and summarize and cite the graphics in the text, not simply provide graphics with no explanation or tie-in to the document.

Consideration of National Planning Factors:

pp. 38-39 Only the briefest coverage and no direct discussion of the National Planning factors themselves. Need to integrate and give details concerning the Planning factors and how they are incorporated into their vision and goals process.

Long and short range strategies/actions that provide for the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

Need better explanation and more detail as to what is being depicted in the graphics.

Both long and short range strategies/actions that provide for the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

pp. 38-78, pp. 38-39, pp. 40-78 and pp. 67-72 These sections are very general and do not provide the detail about the Eastgate planning process. They need to integrate the discussion from pp. 31-37 on travel demand (need more in-depth detail and discussion in this section to explain how this analysis ties into TIP and Plan development) with the Vision and Goals and then the "Gears." What specific programs are in use or being developed by Eastgate to help these "Gear" elements play their part in system interoperability both now and in the years to come, through 2040?

Latest estimates and assumptions for population, land use, travel, employment, congestion, and economic activity.

pp. 15-37 The basic elements are there but throughout each section - need to provide more detail and tie in graphics with text (summarize and cite the information in the graphics) to explain how these elements tie into Eastgate's planning process.

The current and projected transportation demand of persons and goods in the metropolitan planning area over the period of the transportation plan.

pp. 31-37 and p. 84 There needs to be an expanded discussion of travel demand on the Eastgate system and how current data (ODOT and Eastgate) and travel demand modeling results impact project development, assessment and prioritization process.

Existing and proposed transportation facilities (including major roadways, public transportation facilities, intercity bus facilities, multimodal and intermodal facilities, nonmotorized transportation facilities (e.g., pedestrian walkways and bicycle facilities), and intermodal connectors) that should function as an integrated metropolitan transportation system, giving emphasis to those facilities that serve important national and regional transportation functions over the period of the transportation plan. This includes due consideration of bicyclists and pedestrians per 23 U.S.C. 217(g).

pp. 67-72, p. 87 Existing and proposed transportation facilities are given only cursory review of their condition at present, let alone in the future. There is no assessment of transit facilities in this regard, except for revenue assessment. There is no needs analysis for any of the modes. There needs to be less definition of the concepts and more details about the existing and proposed transportation facilities.

Operational and management strategies to improve the performance of existing transportation facilities to relieve vehicular congestion and maximize the safety and mobility of people and goods

pp. 67-72, pp. 124-130 The operational and management strategies need to be expanded and provide details as to the current state of the system and future activities to provide for safety and mobility. While Eastgate does have a CMP (US Code, Title 23, CFR Section 450, Sub Part C, Section 450.320) it has not been updated since 2010 (7 years+) and there is very little information provided, not even a link. There is nothing on the current state of congestion in the Eastgate area and up-to-date information on transportation system performance, other than they state they have “conducted several time and delay studies for congested intersections and corridors in the region.” What were the results of the studies? They go on to state “These studies describe corridor conditions, travel movements, time delays, and levels of service.” But they do not provide a summary of what and how the CMP ties into the planning process. What are the congestion management strategies they have put forward and how are these integrated into the funding and implementation stages? They provide a map but do not provide an idea of what is being shown on it. They provide Eastgate’s CMP objectives but no indication of what the changes over time have been, especially since the last update in 2010. How is Eastgate provided for congestion mitigation, especially in light of TPM requirements in the near future? CMP steps include 1) defining regional objectives, 2) Develop the CMP Network, 3) Develop Performance Measures, 4) Collect Data/Monitor system performance, 5) analyze congestion problems and needs, 6) Identify and assess strategies, 7) Program and implement strategies and 8) Evaluate strategy effectiveness. FHWA provides a Congestion Management Process Guidebook for assistance at: (https://ops.fhwa.dot.gov/plan4ops/focus_areas/planning_prog.htm).

Regarding Safety, they have completed a Safety Performance Report (as appendix B). It is a fairly comprehensive report but there is little discussion of the results and findings so recommend expanding the discussion, summarizing and citing the graphics on pp. 129 and 130. In addition, as a point of clarification – on pp. 125 and 128, ODOT’s targets are the actual numbers (provided below for each performance measure to update the table on pg. 125), not the “statewide 1% annual reduction.” The sentence on p. 124 that begins “MPOs may choose to... established DOT statewide safety targets.” should read something to the effect “MPOs may choose to establish targets by either agreeing to plan and program projects so that they contribute toward the accomplishment of the state DOT targets or committing to a quantifiable target for their metropolitan planning area.” The next sentence should read “For each CY 2018 performance measure, ODOT has set targets based on a statewide 1% annual reduction for each performance measure and there are numeric targets for each of the Safety performance measures – Fatalities (1,050), Serious Injuries (9,033), Fatality Rate* (0.91), Serious Injury Rate* (8.01), and number of Nonmotorized Fatal/Serious Injuries (840) With the asterisk indicating the rate per 100 million vehicle miles traveled. Eastgate should be assessing and establishing a baseline that leads them to support ODOT’s targets? The ODOT CY 2018 target numbers are provided to update the table. At this point, Eastgate should use the current assessment (baseline) and explain why/how these numbers lead them to support ODOT’s target

numbers. Recommend expanding the discussion and summarize and cite the graphics in the text. The table on p. 128 is the same as the one on p. 125 and should be showing Eastgate's information.

Consideration of the results of the congestion management process in TMAs

pp. 71-72 While Eastgate does have a CMP (US Code, Title 23, CFR Section 450, Sub Part C, Section 450.320) it has not been updated since 2010 (7 years+) and there is very little information provided, not even a link. There is nothing on the current state of congestion in the Eastgate area and up-to-date information on transportation system performance, other than they state they have "conducted several time and delay studies for congested intersections and corridors in the region." What were the results of the studies? They go on to state "These studies describe corridor conditions, travel movements, time delays, and levels of service." But they do not provide a summary of what and how the CMP ties into the planning process. What are the congestion management strategies they have put forward and how are these integrated into the funding and implementation stages? They provide a map but do not provide an idea of what is being shown on it. They provide Eastgate's CMP objectives but no indication of what the changes over time have been, especially since the last update in 2010. How is Eastgate provided for congestion mitigation, especially in light of TPM requirements in the near future? CMP steps include 1) defining regional objectives, 2) Develop the CMP Network, 3) Develop Performance Measures, 4) Collect Data/Monitor system performance, 5) analyze congestion problems and needs, 6) Identify and assess strategies, 7) Program and implement strategies and 8) Evaluate strategy effectiveness. FHWA provides a Congestion Management Process Guidebook for assistance at: (https://ops.fhwa.dot.gov/plan4ops/focus_areas/planning_prog.htm).

Assessment of capital investment and other strategies to preserve the existing and projected future metropolitan transportation infrastructure, provide for multimodal capacity increases based on regional priorities and needs, and reduce the vulnerability of the existing transportation infrastructure to natural disasters.

pp. 79-91, pp. 57-58 The Funding chapter needs to provide more detail on the process used to select present and future transportation improvements in the region. It is recommended to expand the discussion and summarize and cite the graphics in the text, not simply provide graphics with no explanation. The forecast methodology section needs to be simplified and made to be more understandable for the variety of readers. For example, expand the discussion of the current data (from ODOT and Eastgate data sources) and travel demand modeling results and how they influence/impact project development, assessment and prioritization processes (in this section and in the discussion on pp. 31-37). Provide an overview of the funding sources and the types of projects involved (in text). Explain and provide detail on the short, medium and long term forecasts and how they affect the planning prioritization process. Explain the graphic on p. 91 in detail and provide a table of revenue minus costs (\$0 or greater). Provide information such as how many transit projects are there? Correct the apparent typo "87% Maintenance and Operations" to 67%.

Transportation and transit enhancement activities

Transportation pp. 73-78 Transit - pp. 51-56, p. 83 and p. 87 Transportation – Only covered in the "Technology" section and little information is provided as to what Eastgate is currently working on possible future endeavors. Transit - Good discussion - need to enhance "readability" of graphics and tie them into the text.

In all areas (regardless of air quality designation), all proposed improvements shall be described in sufficient detail to develop cost estimates.

pp. 93 – 115 Easy to read. Would like to see totals for each table/list.

A discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion may focus on policies, programs, or strategies, rather than at the project level

pp. 60 Good discussion but as Eastgate broached the subject - What are they doing to promote/advocate for the ecosystem approach. Need to explain the graphic and lace it in text.

A financial plan that demonstrates how the adopted transportation plan can be implemented (fiscal constraint)

pp. 79 – 91 Recommended Fiscally Constrained MTP section – develop text to explain/reflect the information in the tables/graphics. expand the discussion and provide more details. Explain the graphic on p. 91 in detail and provide a table of revenue minus costs (\$0 or greater). Provide information such as how many transit projects are there? Correct the apparent typo “87% Maintenance and Operations” to 67%.

Adequate public involvement consistent with public participation plan

p. 133, Appendix D This should be a component of the body of the Plan document, not just an appendix. While it is admirable that Eastgate updated its public participation process, (and web site link is provided), Eastgate needs to present/summarize its Public Involvement process. How are Civil Rights, EJ, ADA, etc. incorporated into the PI process (even for this plan update - i.e. meetings and reviews by committees and board, etc)?

In areas of air quality concern (maintenance or nonattainment), a conformity determination by MPO.

p. 59 Good discussion and summary.

Includes consideration of all other federal laws per MPO's self-certification including Title VI and EJ. Specifically, an EJ analysis that meets the technical definition of EJ (low income or minority)

p. 46 Currently, there is minimal discussion of EJ/Civil Rights with the exception of ADA discussion on p. 46 (graphic should be made more readable and explained in the text) in the document. Eastgate will submit the EJ analysis by the end of the week of January 29th and then after FHWA/FTA’s review, will post the additional chapter on their website and extend the public comment period for an additional two weeks. They will present the added EJ analysis and any modifications to the document to their Board and TAC.

A copy of the comments made on individual pages will be provided with these comments.

FTA

Page 17 provides a nice brief discussion on the dilemma of an expanding urbanized area with declining population and the negative externalities including those that are transport-related. Yet, there is nothing concrete in the plan on the extent in which this problem is going to be addressed.

Top of page 27, 1st sentence: Narrative reports percentages of households with vehicles but Table 7 shows the same information as the percentages without vehicles.

Page 27, 3rd paragraph: The last sentence is incomplete.

Page 28, Exhibit N: The last bullet “commute” should be “commuting.”

Page 31: Suggest reporting on per capita VMT (PCVMT) trends as well. The metric provides further insight into performance related to the planning factor of promoting energy conservation. Additionally, PCVMT relates to the planning factors of transport M&O efficiency, resiliency and reliability in terms of how the system in concert with land use has/will minimize(d) the need to travel.

Pages 45-46, Mobility section: The troubling statistic is provided that household transportation expenditures in the region are far beyond the level that is considered affordable. Page 51-2 discusses the struggle of transit operators to sufficiently serve the region and mentions transit-related plans. However, apart from the MPO monitoring these sub-plans and encouraging transit-oriented development, the extent in which these problems will be addressed through plan implementation is unclear.

Page 46, Environmental Justice: A brief discussion is provided on the methodology used in considering environmental justice. However, there is not any analysis on the estimated impact to protected populations as a result of the plan.

Page 55 Rideshare section: In the third to last sentence, “is” should be inserted between “which” and “operated.”

Page 57 Resilience section: “CHG” should be “GHG.” Discussion could include provisions on the extent in which GHG’s will be reduced through plan implementation.

Page 59, Air Quality Conformity section: Discussion could include the extent in which the plan will impact/reduce criteria air pollutants.

Pages 61 and 62, Energy and Land Use sections: Information is provided on how the plan encourages policies to reduce the demand to travel using non-renewable resources. This could be improved to quantify improvements in related metrics expected as a result of plan implementation.

Page 71, CMP: It is mentioned that there will be future CMP updates identifying the cause of congestion, assessing mitigation strategies/alternatives, evaluating improvements, and integration of TSMO/TDM. It is assumed all of these things are already in the existing CMP. It would be beneficial to provide clarity on how these actions will be different from before based on experiences in recent years to improve the CMP.

Page 83, Transit section: Suggest providing the name of the FTA Section 5339 program listed.

Page 85, top of page: Portion of previous sentence is repeated.

Page 79-115, Funding: It is stated at the top of page 79 that the demand for funds is greater than supply. Subsequent pages provide system-level projections of revenues by year and the totals. The grand total of expected revenue is about \$1.8 billion. More than 20 pages of expected costs by project

are listed by year. Page 91 provides a snapshot which includes a total of 353 projects costing \$632.1 million and implies the plan is constrained. Thus, about 35 percent of the revenues are accounted for by costs in the plan. It is unclear how the financial plan is adequate to operate and maintain the system [23 CFR 450.324(f)(11)(i)] given the shortfall in programmed projects/costs and the contrasting assumption that needs are greater than expected revenues.

Pages 79-115, Funding: There is brief discussion on page 91 on evaluating/selecting projects. Public transparency could be improved by describing in detail the performance-based mechanism that is used during this process and how it was selected amongst others. Benefit-cost analysis is suggested.

Pages 116-118, Performance-Based Planning: The FTA transit asset management final rule was issued on 7/26/16 (49 CFR 625 and 49 USC 5326). Per 23 CFR 450.340(f), a plan adopted after this date must reflect the performance-based provisions of 23 CFR 450. Since the expected plan adoption is before 7/26/18, it would be prudent to at least discuss progress to date and forthcoming by the planning partners in coordinating planning for transit asset management. Similar information should be provided for transit safety provisions pursuant to 49 USC 5329 even though a final rule has not been issued.