

# General Public Comment Received

## June, 2010 – September, 2010

The following comments were received through phone calls, emails, and mail and are posted verbatim below in the order received:

Commenter	Date of Comment	Page number/s in report
King	6.16.2010	1-2
Starling	6.17.2010	2-3
Uzunovic	6.25.2010	3,4
Hardy	6.25.2010	4
Johnson	6.25.2010	4,5
Matthews	7.7.2010	5
Norton	7.10.2010	5
Bost	7.16.2010	5
Livable Communities Coalition	8.12.2010	5-16
Chapman	8.25.2010	16

### King (June 16, 2010)

Over the past several weeks I have participated in meeting on the subject of Plan 2040. This emerging 30 year regional sustainable transportation initiative will hopefully have an action agenda and set of enabling action plans to bring it into fruition.

The presentation by representatives from the ARC to the Cobb Transportation Advisory Board and the recent Civic League program at the Chamber provided me and others a greater appreciation for the magnitude of the challenges ahead. I can sum up my perspectives at this stage in these brief set of comments.

#### **Plan 2040 comments**

- Listening to the public will mean hearing from those who are generally uninformed because of life's demands, but will be significantly impacted by the decisions of those who are actively involved. More outreach is needed to enable public decisions concerning our environment, our social situations, and the economy to be more broadly acceptable to the new fabric of communities across our region .

According to demographers, less than 20% of jobs created over the period will be in the logistics/transportation, services, and technology sectors. The development of affordable housing strategies is an urgent priority .

The movement of people from where they live to where they work, learn, and recreate requires reliance on the use of personal vehicles to be reduced from 75% to 60% by 2040 .

Our sustaining principles (environment, social, and economic) are not limited in their

affect by our planning boundaries. Thus, our ability to collaborate in partnership at the grassroots and leadership level must reflect our common interests so we achieve common solutions .

New demographic indicators will challenge communities to move beyond historical paradigms for solutions to transportation, employment, housing, and education .

Growth and development must be conducted with new approaches to zoning and regulations that are not limited to considering a few economic values since our environment and quality of life are equally important to healthy communities .

A healthy community has shared interests and;

Values health, the environment, the economy education, and quality of life

Is safe

Has an infrastructure of housing, transportation, jobs, natural and built environment that combine to support quality of life and valued interests of cultures

I share my observations from my experiences delivering assistance for Smart Growth Planning within communities by supporting and guiding public officials, developers, and urban planners to structure partnerships with municipalities and community organizations. The strategies I have helped create empowered underserved communities to fully participate in sustainable growth that values economic growth, the environment, and quality of life issues.

I will look forward to my continued support and involvement with programs that move Cobb County and the rest of the metropolitan Atlanta region in unison toward transportation and healthy community solutions that embody the voices and aspirations of our changing population and culture.

## Starling (June 17, 2010)

I am still trying to wrap my head around the information presented on the plan 2040 process this morning – good grief it is complicated! This is a tough assignment and I think you guys are doing a great job of expanding/enhancing the process to be more all encompassing.

I do have a few thoughts/concerns that I would like to raise for you to take into consideration that are outlined below:

- 1) **TDM** - Including TDM in the “other” category with studies and ARC programming is not appropriate. Not only is it a dis-service to TDM, it is also inconsistent with the value of TDM as it has been documented in both IT3 and in federal reauthorization. Additionally, it puts TDM into a box that does not take into consideration its potential role with regard to other projects – like delay related to construction projects. TDM has been proven to be very successful when incorporated into construction projects to help mitigate the impacts (Piedmont Road pipe bursting program, 17<sup>th</sup> street bridge, etc). TDM is an all encompassing strategy that needs to be more broadly incorporated into transportation planning and implementation. The way it is

proposed to be segregated off to the side perpetuates the “after-thought” approach that has characterized its role in the last decade. It needs to be a real part of the discussion.

- 2) ***Economic Development Measures*** – It is great to see economic development criteria incorporated into the planning process – that is what drives all decision making in “the real world” so it makes complete sense. I did not, however, really think the proposed criteria adequately reflect what is trying to be achieved. Of course representing a major activity center I am totally biased on this, but I would think that measures more specific to employment should be used – like jobs within a certain distance of the project, access to jobs, density of an area, other things like that should be considered. ARC’s data division has a wealth of employment and development information through CoStar and other sources that can provide specific project level information. I would suggest that you explore incorporating some additional/different measures here.
- 3) ***LCI Program*** – I am a little lost on this one altogether. Similar to my concerns about TDM, I think the value of this program is getting swept aside by its segregation into the “Other” category. This program has been a shining star for ARC and held up as helping to spur the “right” kind of local planning activity largely by tying implementation priority and funding to undertaking the desired type of process which reflects the tie between land use and transportation. How are these key planning ideals going to be supported in Plan 2040? It would be a loss to not incorporate them somehow – they really are the key of what the whole consolidated plan is trying to achieve. I don’t think we have land use integrated enough yet.
- 4) ***Bike/Pedestrian Existing System*** – Expansion of bike and ped systems is great and should be reflected as it is in the project types. However, maintenance and enhancement of the existing bike/pedestrian system is just as much of an issue that is being overlooked and should not be lumped with roadway. Pedestrian enhancements in heavily urbanized activity centers and transit corridors have a significant need and value and should be prioritized highly (Peachtree Corridor is a great example) because they relate to the ability to use alternative commute modes, to minimize/eliminate short trips, access to jobs.
- 5) ***KDP Consistency*** – The comments made in today’s meeting related to consistency of the measures within all KDP levels was a very good one – this is easy to lose sight of and there is probably some disconnect already.
- 6) ***Re-ordering KDP 1 and 2*** – The suggestion made today to reorder these points was an interesting one with some merit. Deciding to spend a set amount of money on a type of projects prior to seeing the quality of the projects available could lead to funding some less desirable projects and not funding others that are good. I think maybe KDP 1 should be more of a goal of spending by type that is re-verified after KDP 2 or something that allows for an iterative process on this.

## Uzunovic (June 25, 2010)

in my opinion Atlanta is a very sick city and it is not just the obesity (shown on your graph), but: the air we breathe and the water we drink. There is also a very little to do (especially regarding arts and cultural

events) so the people (especially lower income folks) sit home, eat junk, while watching stupid (with poor content) TV.

## Hardy (June 25, 2010)

- We are 50 years behind.
- There should be no Hwy 316 to Athens. The traffic is unbearable – no excuse.
- There should be a rail line from Atlanta to Athens, there is already a rail line there. Also should be a rail line from all of the city centers to Atlanta.
- Adding lanes to highways does not work.
- We are turning train depots into restaurants.
- Need a rapid rail line from Warner Robins to Atlanta for a second airport. It has some of the longest runways in the country.
- Warner Robins is an asset that could go away unless it is utilized well.
- Interstate 485 should have been built 30 years ago. 285 shuts down with one wreck.
- Trucking company distribution centers should be located along and outside 485 and Atlanta should be divided into distribution zones.
- Herb Matthews is the founder of Benton Express and is a part of the national trucking scene. He is located in Gwinnett and should be a part of the conversation.

## Johnson (June 25, 2010)

I have an opinion on several large ticket transportation projects. I would hope that you take into account my thoughts on I-75/I-575, the Midtown Tunnel, MARTA expansion, and a western bypass of Atlanta.

**I-75/I-575:** While the concept of reversible express toll lanes is reasonable, the execution proposed is less than desirable. Please consider my proposal, and some of the interchange modifications shown in the the Midtown Tunnel

The proposed **Midtown Tunnel** is prohibitively expensive. I would propose a series of lesser projects. The first would be an SR 400 Flyover connecting SR 400 with the Spring Buford Connector. The second would be an extension of the Freedom Parkway to an interchange with the Spring Buford Connector. The third would be a 2 or 4 lane road connector in Inman Park that would be mostly tunnel from Freedom Parkway to south of the railroad and then connect to I-20. The fourth would be an expressway connecting I-20 to the fifth project, which would be a 4 lane freeway extension of I-675 to the Lakewood Freeway. I believe that these projects together would provide much of the relief sought by the Midtown Tunnel project at a much more feasible cost.

**MARTA expansion:** I believe that MARTA heavy rail should be robustly expanded. Despite its dedicated funding source MARTA has lagged expansion seen in Washington DC, Los Angeles, San Francisco, Chicago, and New York. The Red Line should be extended north to Alpharetta and southwest to Union City. The Blue Line should be extended west to Douglasville.

The Green Line should be extended from Bankhead to Doraville along I-285 and then along with the Yellow Line to Lawrenceville along SR 316. The southern part of the Yellow Line should be redirected from the Airport south of I-20 and connect with the Green Line through Bankhead to the Cumberland Mall, then follow I-75 to Marietta.

**Western bypass of Atlanta:** I believe existing roads and freeways can serve as a western bypass to Atlanta and Macon with a few fairly small improvements at certain locations. This bypass would start near Calhoun and use SR53, the existing and future eastern bypass of Rome, US27, I-185, US280, SR 520, and US82. Initial improvements at La Grange, Calhoun, and Tifton would probably need to be made to make this usable and sections that are not 4 lanes would likely need to be widened. Future improvements could be made as needed.

### Matthews (July 7, 2010)

HOWEVER, what we really need is new capacity on the congested 75-85 Connector, topside Perimeter from I-85 North over to I-20 West. The ONLY practical and fair way to do this is with a PPP to double deck all of these interstates. Tolls would pay for the new top level while the original lower level (local) lanes would remain free. The Downtown Connector could also be reduced in elevation so that everything is at grade level or below with public funds to "cover" the interstate. Additional ROW could be reserved for possible future transit systems. Finally, covered sections would be protected from the disruption in traffic normally resulting from adverse weather events.

### Norton (July 10, 2010)

Please be aware that any and all development or improvements in Cherokee County MUST include a much larger development and integration of open space, walking and bike paths, etc. In the past, all development has been EXCLUSIVELY for the benefit of commercial developer (Canton Marketplace, Bridge Mill, etc.) and we all know why so I won't insult our intelligence with admonitions. It has long since been time for your organization to get a clue. Turning Cherokee County into DeKalb or Gwinnett serves no one's interest. Even the developer's should be able to appreciate that no one wishes to live in such places. An exceptional bike path could be a boon to eco-tourists too...you know, eco-tourists are the only kind not doomed for extinction.

### Bost (July 16, 2010)

Why can we not have a monorail system around I285 and up and down the interstate highways? The majority of the land is already there. Feed the interchanges via bus and the existing rail system.

### Livable Communities Coalition (August 12, 2010)

I. General Recommendations on Plan 2040 Regional Assessment

In winter 2010, the Atlanta Regional Commission (ARC) released a Plan 2040-related paper called the Regional Assessment. This paper outlined a number of key challenges for the region and created a framework for the issues facing our region.

The Livable Communities Coalition (“Coalition”) has elected to provide one set of comments for Plan 2040 through the lens of the Regional Assessment. Our paper provides policy directions or work plan suggestions for the following topics as outlined in the Regional Assessment:

- Urban Expansion of the Region Strains Infrastructure – Policy decisions about where we grow.
- Access to Job Centers is Critical – Policy decisions that focus resources.
- Market Forces May Change Housing Demands – A new approach to housing advocacy.
- Most of the Region has Limited Transportation Options – Building a new and deeper public understanding of transportation.
- As Transportation Needs Increase, Funding Potential Decreases – Looking ahead to future long-range transportation planning.
- Compliance with Tightening Air Quality Standards – Renewed efforts for air quality.

#### 1. Urban Expansion of the Region Strains Infrastructure

The Coalition believes that the “Plan 2040 challenges” of urban expansion, transportation choice, water scarcity, and land conservation are interrelated. We also believe that addressing them in a meaningful way is dependent on two key factors: incentives for growth and redevelopment in centers and corridors, and new development approaches in outer areas.

Among the actions and approaches that ARC should consider in this regard are the following:

- ARC should engage in a long-term public education effort on the need and benefit for density in appropriate places in our region. Well-designed, compact development fosters a stronger business community, a healthier environment, and higher quality of life. Furthermore, new residents of our region could be comfortably accommodated in just a fraction of the metro Atlanta surface area – the region’s major centers and transportation corridors – with denser development. Public education could complement technical and planning resources that are already being generated by ARC in support of transit supportive density and best practices for compact development.
- Place special emphasis on changing planning and development practices in rural areas and suburban neighborhoods in the Unified Growth Policy Map. The Coalition agrees completely with Plan 2040’s identification of urban expansion as a challenging strain on infrastructure, water scarcity, transportation choice and conservation of open space. Due to the current economy, the Coalition believes this is a unique and critical time to change the course of future

development patterns. Policies and practices in rural and suburban areas should be changed to drastically reduce growth in these areas, and should be designed instead to improve the development and redevelopment that does occur.

Every ARC Work Plan item should fall into seamless alignment with this approach, including appropriate modifications to the Livable Centers Initiative Program and corridor studies.

## 2. Access to Job Centers is Critical

A significant percentage of the region's jobs are located in a relative small number of major job centers: Perimeter Center, Cumberland, Buckhead, Midtown, Downtown, and a few others. ARC should support and advance actions that lead to the development of efficient and comprehensive multi-modal transportation systems for these areas. Among the actions and approaches to be considered are the following:

- Tie the term vehicle miles traveled (VMT) to different triggers (environment, greenhouse gases, safety, competitiveness, quality of life, etc.). In doing so the public will better understand and support policies that aim to reduce VMT in job centers through a complete and diverse transportation system (highways, roads, transit, bike, ped, rideshare, etc.).
- Pursue a reform of GDOT road design and construction standards (complete streets, elevating CNU-ITE manual, PE/ROW, B/C ratios, connectivity). GDOT's current street standards are out of date and do not support the co-existence of multiple modes of transportation.
- Adopt official metrics that define a "job center" in the region and establish standard methods of measuring a job center's benefits, impacts, and implications on regional growth and development.

## 3. Market Forces May Change Housing Demands

Comments on housing are presented below in two sections. The first section contains perspectives/assumptions about housing in our region. The second section provides proposals for what ARC's future role might be regarding housing.

### Perspective/Assumptions:

- Housing and related industries have historically been a primary driver of this region's economy. The industry's collapse is a major reason why job loss has been high in last two to three years;
- This region has a significant surplus of existing houses, apartments, and undeveloped lots that will moderate the pace and opportunity for new development;
- Unfortunately, the region is a national leader in foreclosure activity, which is concentrated in two types of areas:

- o Older, poor, urban neighborhoods, particularly in south and west Atlanta, where sub-prime and predatory lending flourished; and
  - o Newer suburban communities where housing was over-built and sold primarily with sub-prime and adjustable-rate mortgages.
- The regional housing market is going through a structural, not just cyclical, change. This is being driven by changes in demographics of the region, personal economic circumstances, and changes in the housing finance market.
  - In the near and immediate term – three to five years and perhaps longer - it will be harder and in many cases more expensive to buy a house. The rental market will improve before the market for new for-sale homes begins to grow. Preservation and re-use of existing housing will be more important than building new housing.
  - The housing slowdown does not mean the region’s affordability challenges have been solved. Much of the region’s “affordable” housing is in poor condition or not near transit or jobs. Moreover, high unemployment and stagnant incomes make it difficult for many households to find affordable housing.
  - The slowdown in housing activity will also mean that there will be a slowdown in population growth. Over the next three to five years - as with the last two to three and perhaps longer - it is not likely that the region will grow as ARC has projected.

What could ARC’s role be in housing?

ARC has supported housing, planning, and policy-making in its efforts in land use, aging, government services, and community education. More recently, ARC has been a leader in recognizing the connection between housing and transportation in its efforts with the LCI program. However, since the collapse of federal housing planning funds in the 1980s, ARC has not had a focused, directed effort toward housing in terms of how it is organized and funded. Housing has been a secondary or collateral activity, not a primary one.

In the future, ARC should make housing one of its top priorities, given its inter-relationship with transportation and land use. This has implications for how ARC is organized internally, the number and qualifications of staff assigned to this area, and the budget it provides. Specifically, ARC could be engaged in housing more directly in four ways:

- 1) Financing assistance;
- 2) Zoning and land use regulatory reform;
- 3) Promotion of innovative or advanced tools; and
- 4) Technical assistance.



1) Financing Assistance: ARC should look for ways to support regional housing needs directly with new kinds of financing assistance:

- o ARC could investigate best practices in terms of “flexing” certain types of transportation funds it receives to create new funding or incentivizing targeted TOD development (such as workforce housing) near transit stations (see Portland, San Francisco, Denver).

- o ARC could work with county governments to create (with a combination of local, federal and private funds) a “Regional Housing Trust Fund” that could provide gap financing to targeted affordable and workforce housing projects throughout the region. This fund could also be used as a source of matching funds when applying for federal grants for particularly important projects.

- o ARC could assume a more proactive role vis-à-vis the state housing finance agency (Georgia Department of Community Affairs) in helping develop stronger and more effective state participation in affordable housing.

2) Zoning and Land Use Regulation

- o ARC should develop, alongside appropriate local partners, model housing regulations that are Atlanta-area specific for communities to consider when crafting zoning and land use regulations.

3) ARC could work with non-profit, public sector and private groups to help catalyze the development of innovative, region-specific “tools” (such as community land trusts, accessory housing incentives, density bonuses, etc.) for expanding housing choice and affordability. A small research and development budget in ARC could further these efforts.

4) Technical assistance

- o Encourage local officials and local planning staff to take advantage of ARC’s expertise and provide technical assistance and training on methods or best practices for meeting housing needs.

- o Help local governments with talking points, communications strategies, or research to combat NIMBYism.

- o Set housing targets and help local communities develop housing work plans.

- o Provide best practices and research on code enforcement for local governments.

- o Assist in establishing or strengthening local coalitions - including citizens, nonprofit organizations, and businesses - to look at housing together with education, safety, and transportation comprehensively.

o ARC should build on its work with the Neighborhood Nexus platform, and create standards local governments can turn to in generating and collecting housing data across the region. This will provide ARC with more specific, standardized data and metrics with which to study and address housing on a regional level.

#### 4. Most of the Region Has Limited Transportation Options

ARC should continue to strive to expand transportation alternatives to those that do not have access to an automobile, and, at the same time, expand options for those who may wish to travel by other modes if they had the choice. To accomplish this will require setting the right priorities for new investments in public transportation and in bicycle and pedestrian improvements. It will also require identifying new sources of transportation dollars such as those that will hopefully be provided through the recently enacted Transportation Investment Act of 2010.

In addition, however, there are a number of other potential actions ARC can take in this regard that are not necessarily dependent on large infusions of new transportation funding.

- Explore a communication/education/incentives campaign to address audiences that are most likely to take transit but do not.
- o Conduct research on exactly why riders who can take transit do not take transit (weather, station issues, accessibility, time, etc.)
- o Identify how resources could be directed to reduce or mitigate real or perceived negative aspects of transit use.
- Similarly, explore strategies to greatly increase flex time employment as an interim solution to peak-hour traffic congestion.
- Investigate where parking subsidies provided without option for transit benefits are undermining transportation choices for employees who live and work near transit.
- Continue to strive for seamless regional transit service into the future by building the Regional Transit Committee into an effective long-term transit administrative body.
- The transportation work plan should make reference to emerging bus rapid transit (BRT) facilities. ARC should promote policies that ensure BRT facilities are neighborhood-oriented as opposed to isolated from where people live and work.
- Continue to support and or elevate a focus on transit-oriented development through technical resources, incentives, and the full implementation of the proposed ARC-MARTA-LCC Partnership.
- Address the high crash rate near bus stops by investing in safer crossings on multi-lane transit routes.

- Planning and funding priorities should quickly begin to recognize the urgency of human service transportation. These needs are significant and will continue to grow as the population becomes older demographically.
- Encourage local governments to develop, update, and implement more quickly the Americans with Disabilities Act Transition Plans by providing workshops and grants.

## 5. As Transportation Needs Increase, Funding Potential Decreases

Due to likely continuing fluctuations in transportation funding, ARC will need to re-adjust to new transportation needs and opportunities on a more frequent basis.

- Update the Regional Transportation Plan (RTP) sooner than 2015 for the chief purpose of clearing the project list. By revising the list sooner than later, ARC can closely analyze the project list and compare the projects' merits with 2040 policies. The sooner the RTP can be updated, the sooner the region can remove projects that are not consistent with outcome-based performance.
- Consider the feasibility of access management and demand management solutions before advancing road expansion projects.
- Begin a concerted effort to find a dedicated source of transit operating funds, including renewed and serious consideration of various pricing mechanisms.
- Explore a unified regional transportation platform – a type of regional compact – that can be used by officials and organizations to leverage federal funds. Such a platform would put a unified voice forward on the region's priorities and by doing so would create a strong connection between transportation investment and regional competitiveness.

## 6. Compliance with Tightening Air Quality Standards

Atlanta has struggled to attain federal air quality standards for ozone pollution and the current standards will be tightened in the near future. Mobile sources are the largest source of ozone pollution in the Atlanta region. Failure to comply with federal standards for air pollution reduces the quality of life and hurts the economic competitiveness of the Atlanta region.

- Reducing ozone pollution from mobile sources and compliance with federal air quality standards as expeditiously as possible should be explicitly stated goals of the plan.

## 7. Plan 2040 Generally

The success of Plan 2040 depends on the engaged support of multiple constituencies. It also should look to incorporate ideas about forward-thinking issues like climate change and education reform that are critical to the region's future but where specific public policy actions are not yet ready for implementation. Still, there are steps that ARC can take to make Plan 2040 more relevant in this regard.

- Translate and share the final Plan 2040 for different audiences so that:
  - o The goals and objectives of Plan 2040 would be made plain to all sectors (local, regional, business, tourism, civic, the public);
  - o ARC can present the plan in a way that is user-friendly to different audiences. Present the plan to respond to the perspective of citizens (including different age groups and suburban/urban populations), businesses, advocates, and local governments so they understand how the plan incorporates their needs; and
  - o People can absorb the plan through several different contemporary communication outlets (web, social media, etc.)
- Include greenhouse gas (GHG) and vehicle miles traveled (VMT) reduction targets in Plan 2040 to help ensure that the plan contributes to progress on climate change and better aligns with forthcoming federal guidance on energy efficiency and reducing greenhouse gas emissions.
- Explore policy implications for the connection between smart growth efforts and public schools (preferences, trends, real estate).

## II. Recommendations for the Draft Performance Framework

### 1. Overall Context and Themes for Coalition Recommendations on Performance Framework

As part two of this paper, the Livable Communities Coalition has prepared recommendations on the proposed Performance Framework for transportation planning. We have particularly focused on this area because we believe it is perhaps the most critical “plan development activity” that results from Plan 2040 and its Objectives, due to its importance to the process of prioritizing and selecting transportation projects for future investment.

Prior to presenting our specific recommendations in this regard, the Coalition would like to share its ideas on the how the Performance Framework should be best structured by ARC. This includes the following:

- **Prioritization:** The ARC has stated that Plan 2040 will represent a sustainable approach that explicitly integrates the regional land use plan with the regional transportation plan. The Coalition believes that it would be most effective to elevate criteria for land use and transportation policies to the top of the decision waterfall.
- **Funding Scarcity:** State and federal transportation funding, despite a possible 10-year boost through the Transportation Investment Act of 2010 will be scarce for at least the lifecycle of the 2040 regional transportation plan (2010-2014 RTP). Decreasing federal and state funding available for transportation over the long-term necessitates a more targeted approach to project selection; we argue that this targeting should support specific regional goals.

- **First-level Decision Making:** The current representation of the performance framework (July 12 draft) implies that the region invest in a project type until investment reaches a tipping point of diminishing returns in performance. The Coalition suggests that outcome-related metrics readily available at ARC (such as a connectivity index, percentage increase/decrease in single occupant vehicle travel, jobs/housing balance, vehicle miles traveled, etc.) could be the filter for the first level of decision making.
- **Demographics:** The aging of the population will reduce demand for single-occupant vehicle travel and increase demand for transit, walking, human services transportation, and off-peak transportation in general. In addition, market studies suggest a growing preference by people of all age groups for more transportation and mobility options. The criteria should reflect a move toward this shift.
- **Policy Direction:** Decision-making criteria should reflect the principles of emerging federal funding priorities.
- **System Preservation:** The Performance Framework should include road and transit preservation projects in the second and third levels of analysis instead of leaving them out.
- **Funding Priorities:**
  - o Criteria regarding the Unified Growth Planning Map (UGPM) should be narrowed by removing the “developing suburbs” category from the qualifying list; and
  - o Criteria regarding automatic approval of projects in the Statewide Strategic Transportation Plan should be reconsidered.
- **Include Transportation Demand Management (TDM) funding in the Performance Framework.** TDM is currently excluded from ARC project selection. It should be included because these measures will likely continue to serve very important functions for congestion relief and livability.
- **Accounting for accidents:** How safety-related incidents (accidents, injuries, fatalities) are measured should be differentiated according to mode (i.e. accidents for roads, injuries for bicycle routes).
- **Bicycle, pedestrian, transit reforms:** Policy updates are needed for bicycle, pedestrian, and transit projects. The Coalition suggests changes in funding levels, funding eligibility, structure of funding, and incentives for complete streets.

## 2. Specific Recommendations for Performance Network

### Recommendation 1: Allocation of Funds at KDP 1

Currently, the proposed KDP 1 is not criteria or a filter but rather a predetermined allocation of money. Projects are strongest when measured against applicability in getting us towards a future transportation system that links land use and multi-modal needs.

The first level (KDP 1) criteria should be outcome-based and not linked to stand-alone decisions about distribution of dollars across project types. For this reason, the Coalition suggests that the current KDP 1 should be changed as follows:

- Replace the current KDP 1 with a modified version of the current KDP 2 criteria. KDP2 needs to be modified to tie back to the overarching goals for the plan. Currently KDP2 is a “plan filter”- meaning it questions whether the prospective project is in a relevant plan. What the region might have in KDP2 are substantive policies that tie back to the overarching goals of Plan 2040.

Plan 2040 includes specific overarching challenges (urban expansion strains on infrastructure; water availability; access to job centers; face of Atlanta changing; market forces and housing needs changing; limited transportation options; urbanization and conservation; funding scarcity; tightening air quality standards). Why should the overarching goals for the plan not guide the allocation of funds between project types in KDP 1?

- In addition, substantive policies should be cross-cutting so that the region is advancing projects in all of the types that serve the same goals. The Coalition suggests that ARC elevate the following metrics for future roadway capacity and network improvements:

- o Jobs/housing balance: If a project scores well, credit is given. Overall, job centers would be given a higher priority.

- o Connectivity index: If the project scores well, credit is given.

- o Livable Centers Initiative area: Livable Centers Initiative Program sites located in non-growth areas of the ARC Unified Growth Policy map could be afforded advantages in implementing their plans in lieu of new road capacity projects in less developed outlying areas.

- o Percentage increase in trips not taken in single-occupant vehicles (SOV): This measure increases system efficiency, reduces vehicle miles traveled (VMT) and reduces greenhouse gas (GHG) emissions.

- Lastly, the Coalition recommends an update of the Regional Transportation Plan (RTP) sooner than 2015 for the chief purpose of closely analyzing the project list and comparing the projects’ merits with 2040 policies rather than grandfathering in the current project list and projects. The sooner the RTP can be updated, the sooner the region can remove projects that are not consistent with outcome-based performance based criteria.

Recommendation 2: Vertical consistency between KDP levels

- It would be optimal to have vertical consistency between the KDP levels to the greatest extent possible. For example, roads use different criteria in Levels KDP2, KDP3, and KDP4 (see the items in slide 21, slide 30, and slide 41).
- As a second example, if reducing vehicle miles traveled (VMT) is the goal (and the Coalition strongly recommends that it should be a major goal), then the region would not advance a project through KDP2 that would increase VMT. In KDP 3, the projects that will reduce VMT the most get prioritized. And in KDP4, assess the plan success by the aggregate reduction in VMT.

#### Recommendation 3: Transit preservation

Include road and transit preservation projects in the KDP 2 and KDP 3 analysis. The life cycle cost implications of expanding road capacity must be emphasized to decision makers by including preservation in both KDP2 and KDP3.

#### Recommendation 4: UGPM criteria

- KDP 2 criteria regarding the UGPM should be narrowed by removing the “developing suburbs” category from the qualifying list.
- The July 2010 version of the Performance Framework stated that if a project does not meet previous criteria, then it may also proceed to KDP3 for projects if it is in the Statewide Strategic Transportation Plan. Project priorities in the Statewide Strategic Transportation Plan may not be priorities for the region. In addition, the project priorities of future versions of the Statewide Strategic Transportation Plan may change during the next administration. For these reasons, KDP 2 criteria that provides a waiver should be reconsidered.

#### Recommendation 5: Transportation Demand Management

- Include Transportation Demand Management (TDM) funding in the Performance Framework for project selection. The Coalition supports TDM as part of the overall transportation program because TDM is included in the Statewide Strategic Transportation Plan and is expected to be a valued part of the next federal transportation reauthorization bill. As funding for large new transportation projects is expected to be constricted over the next several years, TDM measures should not be discounted. For all these reasons, the Coalition strongly supports an open and inclusive planning process for TDM.

#### Recommendation 6: Safety

- Categories of Incidents: The Coalition suggests that ARC explore and revisit how transportation incidents (accidents, injuries, fatalities) are measured so that decision making is neutral for each mode. For example, it may be that the “number of injuries” is a better metric for pedestrian/bike projects than “number of accidents.”

#### Recommendation 7: Bicycle/Pedestrian/Transit

- Increase the overall share of funding for pedestrian and bicycle projects. If the existing framework remains in place (based on the July 12th draft), then address base funding levels and historic underinvestment in these projects at the KDP 1 level.
- Parallel Routes: The Coalition encourages funding eligibility for activity center circulators; support for pedestrian projects within proximity to bus routes; and allowing bike routes on non-RSTS roads. As noted in the public comments at the July 12th workshop, parallel routes are often as suitable or more suitable than the primary RSTS route.
- Resource Allocation: The Coalition finds that there should also be lump funding awarded to existing pedestrian infrastructure just like transit and roads as it is inadequate to simply fund implementation and not maintenance.
- Structure of Performance Framework: If the existing KDP 1 level criteria remain in place, bicycle and pedestrian projects should not be considered as one singular entity, as they have different needs and outcomes.
- Complete Streets: Additional credit should be given to road expansion and road maintenance projects that comply with complete streets standards.

## Chapman (August 25, 2010)

It seems the city is going backwards...MARTA is in trouble and now GRTA is in trouble. My husband and I live in McDonough, GA and have taken GRTA/MARTA since January 2005. It has been a huge blessing not to have to drive to Atlanta every day...I work in Buckhead across from Lenox Mall and my husband works on Clairmont Road, across from Sam's Club. He has to take GRTA, the MARTA train and a MARTA bus to get to work, but it is well worth it for expenses, gas, and insurance saved on our car. It is hard to believe that we may be driving again because there is no funding for GRTA. Lots and lots of people depend on GRTA - and MARTA - to get to work and those people, like us, live in the suburbs with no other alternatives. There is no money for GRTA, but the DOT can turn make HOT lanes? We don't need more traffic on the roads; we need less traffic. It would be a time saver for GRTA riders and a money saver for GRTA if GRTA could have dedicated buses to take people to the nearest MARTA train station instead of all the way downtown. I realize the government workers balk at this idea - they like being dropped off in front of their buildings - but it would be a win-win situation for GRTA and MARTA if we could use GRTA to get us to MARTA instead of downtown. A focus should be on NOW and the immediate future...