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 www.crtpo.org

TO: CRTPO Delegates & Alternates  
 FROM: Neil Burke, AICP, PTP  
 Senior Principal Planner  
 DATE: February 12, 2014  
 SUBJECT: **SPOT Prioritization 3.0 (P3.0)**  
**Local points methodology – summary of public comments received**

As part of NCDOT’s SPOT project prioritization P3.0 process, each MPO in North Carolina was required to develop a methodology to assign local input points to candidate projects, and public involvement was also a requirement of this effort. A press release was issued on Tuesday, January 28 announcing the beginning of a two-week comment period ending on Wednesday, February 12. The local input points methodology was posted to the CRTPO website along with a comment card where users could provide their input on the draft methodology.

The following comments were received between the afternoon of January 28 and the close of business on Wednesday, February 12. Responses were received from Alta Planning and Design and the Southern Environmental Law Center.

Mr. John Cock  
 Principal, Southeast Region  
 Alta Planning + Design  
[johncock@altaplanning.com](mailto:johncock@altaplanning.com)  
 (Received on Saturday, February 1)

**A. Questions regarding project submittal and categorization**

ID	Comment	Staff Response
1	The intention of the green category (“to be added to database”) in the highway projects list is not clear in the P3.0 Endorsed Highway Project Recommendations spreadsheet...these seem to be most of the complete streets projects. Are these 2nd tier projects or will they also be ranked with all other projects?	The projects that were marked “green” within the CRTPO P3.0 Endorsed Project Spreadsheet were not included in SPOT 2.0 and CRTPO approved their entry this fall as part of SPOT 3.0. MPO’s were given the opportunity to submit new projects and remove existing projects from the list. Of the 22 new projects, eight are classified as Statewide Mobility tier (mostly interstate highways), ten are categorized as Regional Impact tier (US and NC highways), with the remaining four projects labelled as Division Needs projects (SR system). Once NCDOT calculates the SPOT scores for the existing projects in the CRTPO database as well as the new projects (marked green), staff will rank the existing (2.0) and new (3.0) projects in consideration of local input points for the Regional Impact and Division Needs categories. In summary, all of the Regional Impact and Division Needs projects within the spreadsheet you referenced will be ranked simultaneously in CRTPO’s local points assignment process once the final project scores are available from NCDOT.

ID	Comment	Staff Response
2	<p>Why aren't all of the non-interstate/non-expressway highway projects defined as complete street projects by default? Are complete street enhancements only applied if requested by local requesting agency? And, if so, why wouldn't NCDOT CS standards apply to all eligible NCDOT projects automatically?</p>	<p>The classification of the Regional Impact and Division Needs categories was determined by the Strategic Transportation Investments legislation. Complete streets treatments are a consideration when determining the cross-section for the proposed projects when an agency enters a Regional Impact or Division Needs project.</p> <p>CRTPO assumes a "complete streets" cross-section on virtually all non-interstate/non-expressway projects. NCDOT divisions, MPOs, and RPOs can enter new projects as part of the SPOT P 3.0 process.</p>
3	<p>Disappointing that no transit projects are included, but I guess that is due to no local projects being submitted by local agencies?</p>	<p>The transit agencies within the CRTPO planning jurisdiction did not submit any new projects as part of P3.0; however, there are existing transit projects entered as part of P2.0 that will be ranked as part of P3.0. NCDOT can also submit new transit projects within the CRTPO planning area as part of P3.0.</p>
4	<p>Regarding highway projects, most seem related to responding to projected "capacity" (supply) needs. However, there are no proposed projects that intend to mitigate the roadway "needs" through demand mitigation strategies.</p>	<p>The highway projects shown in the spreadsheet that you referenced have been included in CRTPO's Draft 2040 Metropolitan Transportation Plan (formerly known as our LRTP). Since the CRTPO region is identified as a Transportation Management Area (TMA) by the Federal Highway Administration, we must complete a Congestion Management Process that has pre-screened many of the projects in the spreadsheet for demand mitigation strategies.</p> <p>While some of the projects do address vehicular capacity issues, there are twenty new bicycle and pedestrian projects that CRTPO will submit for P3.0 in a separate spreadsheet that address multimodal transportation needs. These new bicycle and pedestrian projects were submitted to CRTPO from its member jurisdictions with the understanding that if the project is selected by NCDOT for inclusion in a future year TIP, a local match of at least 20% must be provided by this community.</p>

ID	Comment	Staff Response
5	<p>The draft prioritization process seems close to unintelligible, especially for the general public. I say that as a former MPO staffer and transportation planner. Now, I know that there are many, many folks in the public who are far smarter about these matters than I, but I'm afraid that still many others in the public would find, like I did, that the prioritization methodology is quite opaque and difficult to provide intelligent comments on without much prior understanding or long hours of study and research. As such, asking the general public to provide input feels like a token effort. I realize that CRTPO is somewhat hamstrung by NCDOT/legislative and federal requirements, but it does seem that the process needs to be more transparent and intelligible if genuine public input is desired.</p>	<p>Staff is in agreement that the presentation of the local points methodology needs some clarification in order for all readers to understand CRTPO's process. There was a short timeframe for CRTPO staff to understand the new STI legislation, develop a draft methodology, and seek public input. A similar local input points methodology will be required for Prioritization 4.0, and CRTPO staff will continue to refine the document to ensure it is understood by all stakeholders within the region.</p>
6	<p>It is not clear from the website how the projects were chosen. That would be helpful to explain to the public. My recollection from my MUMPO days is that the projects are submitted by local agencies, but this is not clear from the project list.</p>	<p>The highway projects were chosen from the 2016-2025 horizon of the 2040 Metropolitan Transportation Plan.</p> <p>The bicycle and pedestrian projects were submitted from CRTPO member jurisdictions, with each project ranked based upon a methodology approved by the CRTPO board. Some of these projects were submitted as part of P2.0 in 2011 and others will be entered for the first time as part of P3.0. The twenty bicycle and pedestrian projects with the highest cumulative scores based upon CRTPO's bicycle and pedestrian ranking methodology will be entered by CRTPO staff as part of the P3.0 process.</p>
7	<p>I seem to recall from previous MPO public input processes that there were maps that showed the location of projects. Are there maps of the projects that could be provided on the website?</p>	<p>CRTPO staff is currently working on maps that will show the location of the proposed projects that we have submitted as part of P3.0. These maps will be posted to our website in the near future.</p>
8	<p>Regarding specific projects, I was surprised that the Mooresville-Charlotte Trail was NOT listed on the bike/ped projects list.</p>	<p>CRTPO had an existing list of bicycle and pedestrian projects that was scored for consideration of the highest ranking twenty projects for submittal in consideration for P3.0 funding. There will be an opportunity during P4.0 to submit new bicycle and pedestrian projects.</p>

**B. Mr. John Cock, Alta Planning + Design – Questions regarding the proposed prioritization process:**

ID	Comment	Staff Response
9	<p>If public input and local ranking is part of the criteria, then would it make sense for the public to have a chance to rank the proposed projects? It is not clear what is intended “local ranking” and how public ranking would be obtained and if public input would be qualitative or quantitative or both. An explanation of how local ranking is to be measured would be helpful.</p>	<p>There will be an additional public comment period in the Spring/Summer of 2014 once CRTPO has a draft list of projects recommended for local input points. NCDOT needs to finalize the SPOT scores for all submitted projects before CRTPO can assign its local points. All public comments received on the local points methodology and the assignment of points will be presented to CRTPO’s Technical Coordinating Committee, and Policy Board for their consideration, and the policy board does have the authority to reallocate points based upon the public input received. Need additional clarification from commenter regarding public comment being qualitative, quantitative or both.</p>
10	<p>The proposed prioritization process doesn’t seem to directly address the STI objectives of “projects focused on easing congestion and enhancing safety, while allowing small towns to invest in projects that help improve access to medical services, economic centers, education and recreation” Why couldn’t these objectives be directly quantified and projects ranked on these very clear (albeit, incomplete) criteria? Or if these objectives are being addressed, it is not clear from the draft criteria.</p>	<p>CRTPO’s 2040 MTP was the primary source of the projects submitted for P3.0 and the ranking criteria for this plan considered job access, economic development, environmental justice, natural resource impacts and community resources as some of the factors to select projects. It is apparent from your comments that we need to provide additional descriptions on the linkages between our MTP project selection process and NCDOT’s project prioritization process.</p>
11	<p>Criteria for air quality, public health, and other environmental impacts (which could fall under the objective of “safety”) are noticeably absent from the proposed criteria. (The Nashville MPO does a great job of including public health and equity impacts in its project ranking process.)</p>	<p>CRTPO’s MTP did consider air quality and environmental impacts in the selection of projects. A greater emphasis on public health will be considered in the development of the next MTP.</p>
12	<p>Equity impacts (for seniors, youth, 0-car households, and disabled), access to transit, and ability of a project to reduce VMT are also absent from the prioritization criteria.</p>	<p>These factors were considered in the development of the 2040 MTP and the Congestion Management Process.</p>
13	<p>Also, projects that serve multiple modes should also receive extra consideration in the criteria.</p>	<p>Good comment. While many of our projects do serve multiple (current or future) modes, we can discuss this as a potential stand-alone criteria as part of the development of a local points methodology for P4.0.</p> <p>CRTPO assumes a “complete streets” cross-section on virtually all non-interstate/non-expressway projects. NCDOT divisions, MPOs, and RPOs can enter new projects as part of the SPOT P 3.0 process.</p>

Ms. Kym Hunter  
 Staff Attorney  
 Southern Environmental Law Center  
 khunter@selcnc.org  
 (Received on Wednesday, February 12)

ID	Comment	Staff Response
1	We agree with CRTPO's decision to screen out projects that do not have any reasonable chance for funding under the STI. Through this screening exercise, CRTPO will ensure that its local input points will not be wasted on projects that would not be funded even with the local point allocation.	Comment noted.
2	We also agree with CRTPO's suggestion to rely on its MTP scoring system for the ranking of highway projects. The MTP scoring system takes a comprehensive look at the merit of road projects. We do remain concerned that the "congestion" metric receives an overly heavy weight in the scoring system, and may not ultimately lead to the congestion relief desired by the MPO due to, among other factors, Braess's paradox, by which the addition of lanes to heavily congested roads leads only to additional trips, and not, ultimately, to congestion relief.	Comment noted.
3	Nonetheless, we appreciate that the MTP scoring system includes a Tier II evaluation that considers how projects address the sustainability of the overall transportation system. We particularly like that the Tier II evaluation considers environmental justice impacts, as well as impacts to natural, cultural, and historic resources.	Comment noted.
4	We are disappointed to see that the local input methodology for non-highway projects relies wholly on the P3.0 project scores. This decision essentially eliminates the purpose of having local input scores.	A methodology to prioritize non-highway projects was not developed within the 2040 MTP as it was for roadway projects. The use of the P3.0 score as the only metric to rank non-highway projects is consistent with MPO's throughout North Carolina.
5	Unlike CRTPO's MTP scoring process, the P3.0 methodology includes no "sustainability" evaluation, often a key consideration in non-highway projects. As such, we urge CRTPO to develop its own system for ranking non-highway projects in order to get the most out of the local input points it has been assigned.	CRTPO does have an approved bicycle and pedestrian project scoring methodology that ranks each project based upon a comprehensive and technically-oriented project ranking process. CRTPO staff used the Bicycle/Pedestrian Project Ranking Methodology to screen the highest twenty projects to submit for SPOT 3.0.

ID	Comment	Staff Response
6	To ensure these comments are taken into full consideration, we encourage CRTPO to further articulate how public comments will be considered in the process. We are also concerned that CRTPO is only allocating a minimum of two weeks for public comment; we believe 30 days would be more appropriate.	Comment noted. The comment period to be provided for the draft assignment of CRTPO's local points will be a minimum of two weeks. Our goal will be to provide more time depending upon the release of the scores by NCDOT and the TCC and MPO meeting schedules.

## Burke, Neil

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**From:** John Cock <johncock@altaplanning.com>  
**Sent:** Saturday, February 01, 2014 2:09 PM  
**To:** info@crtpo.org  
**Cc:** lablackburn2@ncdot.gov; Meg Fencil; Shannon Binns, Sustain Charlotte; cycleforall@yahoo.com; Winters, Richard; George Berger; Harry Johnson; Wade Walker  
**Subject:** RE: CRTPO public input comments

Resending to correct CRTPO address. . .

Cheers,

John Cock  
Principal, Southeast Region  
**Alta Planning + Design**  
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**From:** John Cock [mailto:[johncock@altaplanning.com](mailto:johncock@altaplanning.com)]  
**Sent:** Saturday, February 01, 2014 2:06 PM  
**To:** 'info@crtpo.org'  
**Cc:** lablackburn2@ncdot.gov; 'Meg Fencil'; 'Shannon Binns, Sustain Charlotte'; 'cycleforall@yahoo.com'; 'dick.winters@mecklenburgcountync.gov'; 'George Berger ([g.a.berger1983@gmail.com](mailto:g.a.berger1983@gmail.com))'; 'Harry Johnson'; Wade Walker ([wadewalker@altaplanning.com](mailto:wadewalker@altaplanning.com)); Martin Zimmerman ([greenmobility4@gmail.com](mailto:greenmobility4@gmail.com).)  
**Subject:** CRTPO public input comments

Neil,

Great to see your name in the paper in regards to the subject process (<http://www.crtpo.org/resources/ncdot-prioritization>). I trust new job is going well.

I reviewed the CRTPO project website and was glad to see the information posted there for public review. I have a few comments on the process and projects, which I hope you will add to the public comments to date. (No intent to "shoot the messenger" implied here 😊.)

Regarding process and information for review some questions and comments (some of these may require NCDOT response):

1. Very glad to see bike/ped category and so many worthy projects in the list.
2. Glad to see many complete streets projects in the roadway list. However, see 3 and 4 below. . .
3. The intention of the green category ("to be added to database") in the highway projects list is not clear ([http://www.crtpo.org/PDFs/Prioritization/P3\\_0/HighwayProjects\\_Recommendations.pdf](http://www.crtpo.org/PDFs/Prioritization/P3_0/HighwayProjects_Recommendations.pdf)). . .these seem to be most of the complete streets projects. Are these 2<sup>nd</sup> tier projects or will they also be ranked with all other projects?

4. Why aren't all of the non-interstate/non-expressway highway projects defined as complete street projects by default? Are complete street enhancements only applied if requested by local requesting agency? And, if so, why wouldn't NCDOT CS standards apply to all eligible NCDOT projects automatically?
5. Disappointing that no transit projects are included, but I guess that is due to no local projects being submitted by local agencies?
6. Regarding highway projects, most seem related to responding to projected "capacity" (supply) needs. However, there are no proposed projects that intend to mitigate the roadway "needs" through demand mitigation strategies.
7. The draft prioritization process seems close to unintelligible, especially for the general public. I say that as a former MPO staffer and transportation planner. Now, I know that there are many, many folks in the public who are far smarter about these matters than I, but I'm afraid that still many others in the public would find, like I did, that the prioritization methodology is quite opaque and difficult to provide intelligent comments on without much prior understanding or long hours of study and research. As such, asking the general public to provide input feels like a token effort. I realize that CRTPO is somewhat hamstrung by NCDOT/legislative and federal requirements, but it does seem that the process needs to be more transparent and intelligible if genuine public input is desired.
8. It is not clear from the website how the projects were chosen. That would be helpful to explain to the public. My recollection from my MUMPO days is that the projects are submitted by local agencies, but this is not clear from the project list.
9. I seem to recall from previous MPO public input processes that there were maps that showed the location of projects. Are there maps of the projects that could be provided on the website?
10. Regarding specific projects, I was surprised that the Mooresville-Charlotte Trail was NOT listed on the bike/ped projects list.

Regarding the proposed prioritization process:

1. If public input and local ranking is part of the criteria, then would it make sense for the public to have a chance to rank the proposed projects? It is not clear what is intended "local ranking" and how public ranking would be obtained and if public input would be qualitative or quantitative or both. An explanation of how local ranking is to be measured would be helpful.
2. The proposed prioritization process doesn't seem to directly address the STI objectives of *"projects focused on easing congestion and enhancing safety, while allowing small towns to invest in projects that help improve access to medical services, economic centers, education and recreation"* Why couldn't these objectives be directly quantified and projects ranked on these very clear (albeit, incomplete) criteria? Or if these objective are being addressed, it is not clear from the draft criteria.
3. Criteria for air quality, public health, and other environmental impacts (which could fall under the objective of "safety") are noticeably absent from the proposed criteria. (The Nashville MPO does a great job of including public health and equity impacts in its project ranking process.)
4. Equity impacts (for seniors, youth, 0-car households, and disabled), access to transit, and ability of a project to reduce VMT are also absent from the prioritization criteria.
5. Also, projects that serve multiple modes should also receive extra consideration in the criteria.

Thanks for consideration of these questions and comments. I have copied folks who may be interested in these comments and who may have different or additional perspectives.

I look forward to rich discussion on these topics.

John Cock  
Principal, Southeast Region  
**Alta Planning + Design**  
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February 12, 2014

## **VIA EMAIL AND U.S.MAIL**

Neil Burke  
Charlotte Regional Transportation Planning Organization  
Charlotte-Mecklenburg Government Center  
600 E. Fourth St., 8th floor  
Charlotte, NC 28202  
*nburke@ci.charlotte.nc.us*

***Re: Comments on CRTPO's Prioritization 3.0 Local Input Point Methodology***

Dear Mr. Burke:

We appreciate the opportunity to comment on the Charlotte Regional Transportation Planning Organization's ("CRTPO") proposed Prioritization 3.0 (P3.0) Draft Local Input Point methodology. Under the Strategic Transportation Investment ("STI") program, CRTPO is eligible to allocate up to 2,500 local input points to Regional Impact category projects and an additional 2,500 local input points to Division Needs category projects. As such, CRTPO's local input point allocation will be critical to the success of many projects under the STI program. Below we outline several comments on the draft point allocation methodology for your consideration.

### **Reasonable Chance for Funding**

We agree with CRTPO's decision to screen out projects that do not have any reasonable chance for funding under the STI. Through this screening exercise, CRTPO will ensure that its local input points will not be wasted on projects that would not be funded even with the local point allocation.

### **Quantitative Scores**

We also agree with CRTPO's suggestion to rely on its MTP scoring system for the ranking of highway projects. The MTP scoring system takes a comprehensive look at the merit of road projects. We do remain concerned that the "congestion" metric receives an overly heavy weight in the scoring system, and may not ultimately lead to the congestion relief desired by the

MPO due to, among other factors, Braess's paradox, by which the addition of lanes to heavily congested roads leads only to additional trips, and not, ultimately, to congestion relief.

Nonetheless, we appreciate that the MTP scoring system includes a Tier II evaluation that considers how projects address the sustainability of the overall transportation system. We particularly like that the Tier II evaluation considers environmental justice impacts, as well as impacts to natural, cultural, and historic resources.

Given the comprehensive system CRTPO has developed for scoring highway projects, we are disappointed to see that the local input methodology for non-highway projects relies wholly on the P3.0 project scores. This decision essentially eliminates the purpose of having local input scores. Surely the reason the General Assembly allocated a percentage of points for local input was to make use of specialized local knowledge and to allow input that was separate from the P3.0 process. Unlike CRTPO's MTP scoring process, the P3.0 methodology includes no "sustainability" evaluation, often a key consideration in non-highway projects. As such, we urge CRTPO to develop its own system for ranking non-highway projects in order to get the most out of the local input points it has been assigned.

### **Modal allocation**

We are disappointed to see CRTPO set a firm, low cap on the percentage of points that can be allocated to non-highway projects (15% for the Regional Tier and 20% for the Division Tier). We understand that CRTPO is somewhat constrained by NCDOT's "normalization" methodology, which has set even lower caps on financial allocations for non-highway projects. Nonetheless, because the region covered by CRTPO is an urban metro area, we believe it would be more appropriate to designate higher percentages of points for non-highway modes. Even better would be for CRTPO to develop a methodology similar to its scoring process for the MTP, which would allow all modes to compete with each other and thus obviate the need for any modal allocation.

As CRTPO itself has recognized, the population in the CRTPO region is rapidly expanding, with an additional 600,000 people and 500,000 jobs in 2035, the vast majority of which will be centered in Charlotte itself.<sup>1</sup> This shift towards urbanization has made the availability of mobility choices increasingly critical.<sup>2</sup> To keep up with the trends in the region and remain attractive to potential new residents and businesses, CRTPO must continue expand its non-highway spending. The newest generation of younger adults favors expanded pedestrian, bicycle, and public transportation options, preferring to live in areas characterized by "nearby shopping, restaurants, schools, and public transportation as opposed to sprawl."<sup>3</sup> And this class

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<sup>1</sup> Mecklenburg-Union Metropolitan Planning Organization, 2035 Long Range Transportation Plan, at 1 (March 24, 2010).

<sup>2</sup> See NCDOT, *North Carolina Statewide Transportation Plan: System Inventory and Modal Needs* (August 2012).

<sup>3</sup> U.S. PIRG, *Transportation and the New Generation, Why Young People Are Driving Less and What It Means for*

of workers is choosing where to locate based on these preferences.<sup>4</sup> CRTPO itself recognizes the important role expanded rail infrastructure will play in its future growth.<sup>5</sup> Moreover, as recognized in NCDOT's 2040 Plan, the state's population is continuing to age, resulting in a significant shift in transportation needs and preferences as expanded transit options are essential to aging individuals, many of whom can no longer drive due to deteriorating eyesight or personal mobility.<sup>6</sup>

As such, any plan geared at meeting the CRTPO region's needs and continuing to foster its growth should focus on making smart infrastructure investments in the types of transportation favored by the next wave of businesses and residents. The Charlotte region has a number of large-scale non-highway projects in the works, including the Gateway Station, LYNX Gold and Silver lines, and the Red Line rail project to connect Charlotte to the Towns of Mooresville, Davidson, Cornelius, and Huntersville. These projects will be essential to make the Charlotte region world class, but will likely need some portion of state funding to become a reality. Because these projects are prohibited from competing for funding under the Statewide Strategic Mobility tier, it is essential they be given every advantage by CRTPO under both the Regional Impact and Division Needs tiers.

## **Public Involvement**

CRTPO's draft methodology demonstrates the CRTPO intends to consider public comments on its preliminary point allocation as part of its final point allocation.<sup>7</sup> We agree that the public's ability to comment on the preliminary point allocation is of great importance, particularly as the process is intended to demonstrate local priorities. To ensure these comments are taken into full consideration, we encourage CRTPO to further articulate how public comments will be considered in the process. We are also concerned that CRTPO is only allocating a minimum of two weeks for public comment; we believe 30 days would be more appropriate.

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*Transportation Policy* (April 2012), available at <http://www.uspirg.org/reports/usp/transportation-and-new-generation>.

<sup>4</sup> See, e.g., Jennifer Polland, *Presenting: The 15 Hottest American Cities of the Future*, BUSINESS INSIDER (June 2012), available at <http://www.businessinsider.com/up-and-coming-cities-2012-6?op=1>; Bill Lewis, Walkable neighborhoods gain traction in city as well as suburbs, THE TENNESSEAN (Jan. 26, 2014), available at <http://www.tennessean.com/article/20140126/BUSINESS02/301260037/Walkable-neighborhoods-gain-traction-city-well-suburbs?gcheck=1>.

<sup>5</sup> See, e.g., Mecklenburg-Union Metropolitan Planning Organization, 2035 Long Range Transportation Plan, at 2 (March 24, 2010).

<sup>6</sup> NCDOT, *2040 Plan*, at 12, 20, 23-24, 28; see also Transportation for America, *Aging in Place: Stuck Without Options* (2011), available at <http://www.t4america.org/docs/SeniorsMobilityCrisis.pdf>.

<sup>7</sup> CRTPO, *Prioritization 3.0 (P3.0) – Draft Local Input Point Methodology*, at 5 (Jan. 24, 2014).

## Conclusion

We hope these comments provide valuable input as CRTPO further develops its local input methodology, and look forward to continuing to engage in the process.

Sincerely,

A handwritten signature in black ink that reads "Kym Hunter". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kym Hunter  
Staff Attorney

A handwritten signature in black ink that reads "Kate Asquith". The signature is cursive and somewhat stylized.

Kate Asquith  
Associate Attorney

## N.C. transportation ‘reforms’ are gestures, not true reforms

By Shannon Binns, June Blotnick and Martin Zimmerman  
Special to the Observer  
Posted: Wednesday, Feb. 12, 2014

Those of us who are encouraging reforms to address pressing travel needs have been tracking the Strategic Transportation Investments Act (STI) since its passage in June 2013. Most folks would probably support the goal set by Gov. Pat McCrory and North Carolina Department of Transportation Secretary Tony Tata that funding under this act be spent on an “objective” basis. But that is easier said than done.

Defining what objective really means has become a convoluted affair involving complex methodologies and lengthy discussions throughout the state. In mid-January NCDOT finally asked for public input. Here is our response:

Citizens have been told a new ranking system replaces the state’s long-standing “equity formula.” As Charlotte mayor, McCrory criticized the old formula for favoring rural areas at the expense of cities. And he was right about that. But from the standpoint of needs in his home town and neighboring communities, what he wants now may be as bad, or worse.

Funding methodology for STI’s “Strategic Mobility Formula” is cumbersome at best.

The formula has three “tiers.” Tier 1 is statewide (mostly interstate highways). Tier 2 is regional (i.e. some state roads, Amtrak, ferries etc.). Tier 3 is divisional including other state and local roads, bus and light rail, bicycling and walking.

“Statewide” is supposed to be 100 percent “data-driven” – a well-intended effort to overcome special interest politics. “Regional” equates to 70 percent data-driven and 30 percent local input. “Division” is defined as 50 percent data-driven and 50 percent local input. Kym Hunter of the Southern Environmental Law Center points out, however, that “each mode has its own scoring system. This translates to 20 different systems.” “Local input” is hardly that because 50 percent of the local scoring points are delegated to NCDOT division engineers.

Scores are supposedly derived by applying metrics to “economic competitiveness, access to employment, congestion relief, and safety” criteria. But is it really possible to objectively compare different travel modes? How can one measure the needs of the elderly and poor who can’t afford a car, but who must ride transit to get medical care? Or a child who wants to pedal to school? How can those kinds of users possibly compete for state dollars with cross-state freight travel, ferry boats or commuting motorists?

Although the public was initially promised that all travel modes could compete equally, the facts indicate otherwise. NCDOT has actually set hard limits on the percentage of funds that can go to anything other than new roads or freight rail: a minimum of 2.4 percent and a maximum of 6 percent of all available funds is all that is permitted for other modes.

Regional tier efforts such as the proposed Red Line commuter rail to Iredell County are more restricted than the statewide tier. Not only must they compete with other projects in the same tier, they must also compete with all statewide projects not funded in Tier 1. In addition, rail systems cannot qualify for regional funding unless they span “two or more counties.” This implies that the proposed LYNX Red Line would qualify for state funds only if Iredell County were to join with Mecklenburg in the project.

Funds for bicycling and walking needs will likely get a big hit. STI calls for the traditional state match of federal dollars to end in July 2015. This means that local governments will have to look elsewhere for their bicycling or walkway construction. In addition, by law, “stand-alone” bike-ped projects, defined most often as off-road bikeways or greenway trails, will no longer qualify for state funds. “Complete streets” projects, a crucial source for on-road bike lanes and sidewalks, will continue, but only if tied to street widening or new street construction; this eliminates “road diets,” such as Charlotte’s successful East Boulevard project.

The bottom line is now as bright as a red stoplight at midnight. Modes of travel which one hoped would qualify for state funding were severely restricted by the STI law, and subsequent attempts to determine a ranking methodology have proven to be virtually impossible to rationalize on “objective” or “data-driven” grounds. It’s a process that sets out highways as the winners from the outset. And NCDOT is in the driver’s seat.

Vanished are the high hopes of former N.C. Gov. Bev Perdue’s administration for a balanced mobility policy based upon funding parity for all urban modes – walking, bicycling, transit and passenger rail, and driving. As Paul Morris, formerly NCDOT deputy secretary, expressed in a recent phone call: “We undertook a broad culture change and technical reform to transform the department into a 21st-century, multimodal agency.”

Current “reforms” do nothing of the sort. And gestures to engage citizen input at this late stage will probably amount to little more than gestures.

Shannon Binns is executive director of Sustain Charlotte. June Blotnick is executive director of Clean Air Carolina. Martin Zimmerman is director of Green Mobility Planning Studio USA.