

TO: Sustain Charlotte
FROM: Neil Burke, AICP, PTP
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SUBJECT: CRTPO 2016-2025 DRAFT TIP Public Comment Responses to Sustain Charlotte

Thank you for taking the time to comment on the Charlotte Regional Transportation Planning Organization's (CRTPO) 2016-2025 DRAFT Transportation Improvement Program (TIP) during the 30-day public comment period that began on July 1 and ended on July 31. CRTPO received a substantial number of comments, most stating opposition to the I-77 high occupancy toll lane project from I-277 in uptown Charlotte to exit 36 in Mooresville. Because of the nature of the comments received from the Sierra Club and Sustain Charlotte focused on the non-highway portion of the TIP, a joint set of responses have been prepared and sent to both agencies.

The format used below lists unedited comments in bold italics, followed by bulleted staff responses.

A public comment log can be viewed towards the bottom of CRTPO's [TIP webpage](#).

1. ***The extensive amount of proposed funding for road widening projects is likely to promote further sprawl into undeveloped areas, and thereby further increase our region's reliance on motor vehicles. The CRTPO's current project list focuses almost exclusively on managing travel supply rather than demand. Although some of the highway projects include bicycle and pedestrian elements, they also induce demand for motor vehicle travel. A recent study found that the expansion of alternative modes of transportation could lead to reduced congestion and other benefits, and identified the types of transportation suited to a city or suburb.***

- As you are aware, the majority of the projects included in the TIP received favorable scores from Prioritization 3.0, which is NCDOT's means to implement the STI legislation. It is evident from the STI legislation that capacity expansion projects along congested corridors have scored competitively during P3.0.
- CRTPO assumes a "complete streets" cross-section on virtually all non-interstate/non-expressway projects.
- Staff is in the process of analyzing the work products from the CONNECT Our Future study, and determining how they can be used in the upcoming 2045 MTP. The goal would be to imbed the principals of smart growth and a heightened level of land use planning into the MTPs project prioritization process.

2. ***The extremely low amount of funding (less than 1 percent) for stand-alone bicycle and pedestrian projects in the draft STIP is absolutely inadequate to meet the transportation needs of our region. It is inconsistent with Goals #1 and #2 in the 2040 Metropolitan Transportation Plan:***

- CRTPO staff agrees with this assessment, and attempts have been made to address the shortfall by allocating discretionary funds such as STP-DA, CMAQ, and possibly TAP funds to bicycle and pedestrian projects.

- The STI legislation mandates that a minimum of 90% of the available funds are allocated to highway projects, 4% to non-highway, and 6% through a competitive process between highway and non-highway projects. Bicycle and Pedestrian projects must compete against aviation, transit and rail projects within the Division Needs tier of STI.
- The STI legislation has also prohibited the allocation of state funds to match federal-aid for independent bicycle and pedestrian projects.

3. *The means to make adjustments that might address the above concerns (limited non-highway funding) are not clear because the authority of the CRTPO is not sufficiently transparent.*

- The ultimate authority of CRTPO is the MPO board comprised of delegates from the member jurisdictions elected boards. The MPO board approves policy decisions regarding transportation funding through the MTP as well as NCDOT prioritization processes.
- The primary source of CRTPO's funding for capital transportation projects is NCDOT. They prioritize and allocate state and federal funding based upon the STI legislation.
- CRTPO could modify its financial assumptions within the forthcoming 2045 MTP to assume a greater percentage of funding for non-highway projects, however; this would not be congruent with funding projections in the STI legislation, and thus not a realistic possibility given North Carolina's current transportation priorities that have been enacted into law.

4. *Although it is not part of the 2016-2025 Draft STIP, the lack of a public involvement process at the state level for the Prioritization 4.0 (SPOT 4.0) work group is very concerning to us. In light of our dissatisfaction with the lower than anticipated level of proposed funding for non-highway projects that came out of the SPOT 3.0 process, it is disappointing that there is no formalized process for the public to provide input at a stage where there is still genuine opportunity to incorporate those suggested changes into the final SPOT 4.0 funding criteria.*

- The STI legislation does not specify that the SPOT office should conduct public involvement between rounds of Prioritization.
- The legislation does require the formation of a work group to develop criteria modifications, and work group members should coordinate with their regional stakeholders to determine recommendations for changes to the process.