

TO: Roger Diedrich, Sierra Club (Central Piedmont Group)
FROM: Neil Burke, AICP PTP
Planning Coordinator
DATE: March 15, 2018

SUBJECT: Responses to 2045 Metropolitan Transportation Plan Comments

Thank you for taking the time to comment on the Charlotte Regional Transportation Planning Organization's (CRTPO) draft 2045 Metropolitan Transportation Plan (MTP) document during the comment period from January 16 until February 16, 2018.

In the section below, you will find the comments (or a summary of the comments) that you or your organization provided, along with responses prepared by the Technical Coordinating Committee (TCC).

Comment #1: The 2040 MTP included a statement "These land use patterns have a significant effect on travel patterns, including number of trips, trip length and time, and the choice of mode." This is a critical consideration that must precede most other planning efforts if we hope to transition to a more sustainable transportation network. The 2040 MTP, Chapter 12 listed performance measures and also strategies, such as these, under land use:

- Transportation-Land Use Plans with Locals(sic) Governments
- Develop Overlay Districts to manage Development Densities and Form
- Encourage Regional Activity Centers
- Live-Work Proximity Incentives
- Require MPO review for Regional Scale Developments
- Growth Management Restriction.

Dropping these is a step backward, even though questions remain on their implementation

Response #1: The CMP strategies will be included within an appendix. An overview of the CMP will also be provided within Chapter 5.

Comment #2: "The 2045 MTP does include a discussion and example of scenario planning, which could be an effective tool for addressing the above weaknesses. The disappointment is that there seemed to be no plan to perform a real analysis with the next step being the MTP update four years from now. We urge a more rapid application, including, for example, an analysis of a revenue-neutral replacement of highway widenings with accelerated transit."

Response #2: Please refer to Page 189 of the draft document that discusses a path forward for the scenario planning initiative that is to be complete prior to the development of the next MTP.

Comment #3: The 2045 MTP provides fair coverage of air quality and water impacts but has scaled back its treatment of greenhouse gases (GHG) from the 2040 MTP. This change is being made while:

- Transportation has moved up from second to the largest source of GHG emissions;
- Each year since the last report, we have experienced "the hottest year ever";

- The federal government has abdicated their responsibility on the issue, thus putting the onus on local governments, which is occurring in Charlotte.

Response #3: The 2045 MTP addresses environmental issues in chapter 2. The changes from the 2040 MTP were prepared to more accurately reflect the intersection of long-range transportation planning as implemented by a North Carolina metropolitan planning organization and environmental issues. For example, the section devoted to climate change references the CONNECT Our Future Air Quality/Climate Change Work Group. The truly regional scope of the CONNECT Our Future process is the most appropriate venue for addressing environmental issues.

Comment #4: “There is a discussion of performance planning on page 159 and among the targets noted is Mobil Source Emissions reduction for all CMAQ funded projects. The measure should cover all highway projects, not just those funded by CMAQ.”

Response #4: The performance-based planning requirements and associated implementation standards were mandated by Congress in the Fixing America’s Surface Transportation (FAST) Act, and require that only CMAQ-funded projects be analyzed. The CMAQ requirements are unique in that they must be applied at the urbanized area (UZA) level. This means that the CRTPO must work with its regional partners (Cabarrus Rowan MPO, Gaston-Cleveland-Lincoln MPO, Rock Hill/Ft. Mill Area Transportation Study, NCDOT, SCDOT) to implement the requirements because the Charlotte UZA extends into the planning areas of the three MPOs. Since this is the first time the performance-based planning requirements are being implemented, the CRTPO believes the most prudent approach is to address only the statutory requirements at this time, then determine how best to work with our regional partners to consider a wider approach.