

Final Public Review Comments

August 16 – September 15

SN	Is anything missing in the draft ConnectRVA document?	Does the content make sense? Is the level of detail sufficient?	Do you have any recommendations to make the document easier to read or more accessible?	Additional comments:
1	A one pager that summarizes everything.	Overly detailed for most citizens, findings are hard to identify	Yes, I suggest a one or two pager for each location that summarizes what you are proposing for that location (less formal report)	If you want the input from general public you need to write your report for the general public. This report is beautifully done, well organized, support well with data, but it is not written with the general public in mind.
2		No	Overlay the changes on what is there currently. Fulton still does not look like it is connected to the rest of Richmond without changing buses. Including a link to the White Oak Village might increase the jobs for Fulton tremendously.	Gear it towards someone we does not follow transportation or you are limiting who is going to be involved in the process. A few lines on a map does not tell how it connects to the rest of the picture. I will be nice and only say this is lackluster.
3	It would be nice to work on Cary Street between Westmooreland and River road. The one lane segment creates predictable traffic and has no pedestrian or bike access despite being almost entirely residential housing all around. If find it downright scary to try to cross Cary on foot and life threatening to bike on.	Hard to tell all of the plans, but I'm not a city/regional planner/politician.	The scores and verbiage are harder to interpret. If you really want to see what citizens prefer, why not structure a series to trade off paired questions (would you rather have bus route X v. bike lane Y How about bike lane Y vs. road widening Z). This could determine public values for each proposal and then you could calculate costs per preference.	Thanks for sending out for comments.
4	More information on expanding access to and creating more infrastructure for public transportation and bike and pedestrian infrastructure.	the content makes sense. What doesn't make3 sense is the continued focus on expanding car infrastructure when we are in the midst of a climate crisis. We need to be focused on increasing funding for transportation alternatives that prioritize low and zero carbon expenditures.		
5	An evaluation on the climate impact of spending 2/3 of proposed funds on car-related infrastructure.			We can only hope to tackle climate disaster with coordinated action across industries. For transportation, that requires a focus on both eliminating vehicles that directly produce greenhouse gases and on systematically reducing the total energy required to meet our regional travel needs. Road-widening and other car-focused efforts work directly counter to these goals in a way that no amount of electric vehicle energy source shifting will compensate for. New and wider roads devoted to cars will only increase our regional transportation energy needs and encourage a low density settlement patterns that have a negative impact on both the environment and the local tax base.
6	PUBLIC TRANSIT FUNDING - enough with the car culture.	Somewhat - it's long AF, kinda takes a shovel to get thru	Better exec-summary sections	MORE PUBLIC TRANSIT.

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7		The content seems to be very repetitive and mostly fluff; an abbreviated version may be very useful as a reference guide and for presentations	More bullet-point lists and less aspirational language. Seems like this document is very watered down and doesn't advocate for the improvements that residents are expecting.	
8	No	Yes	No	As a Richmond resident, I fully support the addition and expansion of high quality bike lanes, trails, sidewalks, public transit, etc. for my community!
9	Not enough funding for better transportation (not car centric)	Yes	No	The majority of funds SHOULD NOT be allocated to carcentric infrastructure. Please do not repeat the mistakes of NOVA and the Tidewater area and literally all other regions in the US that are clogged in traffic with no better transportation alternatives!
10	Not to my knowledge	Yes. It is high-level work done with enough granularity to be useful, actionable, and informative	None. I very much like the brief video explainer component as it makes the high-level work more digestible. I also like that folks can schedule with someone to have questions explained.	I am aware that many of the foundational plans that informed the more comprehensive and regional plans exist in a range of two to six years of age. However, [and after the year in climate we have just had] to continue to move forward with 84% of the proposal being roads, 89% when you include bridges, is nothing short of irresponsible.
11		No. This plan is a disastrous recipe for "dumb" growth and suburban sprawl.		
12	Sufficient money for anything OTHER THAN highways.	Needs more inclusion of more points of view	not now	

SN	Is anything missing in the draft ConnectRVA document?	Does the content make sense? Is the level of detail sufficient?	Do you have any recommendations to make the document easier to read or more accessible?	Additional comments:
13	There is way too much emphasis on highways and not enough on public transportation.			Public transportation should take priority over highways to help the region due our part in combating climate-change and to be more equitable.
14			Many of the tables mis-represent numbers as they use variable width fonts making larger numbers appear shorter and thus smaller than they are. For example in Exhibit 11, 170.48 appears longer than 411.01	Far too much emphasis (both in content and proposed funding) on roads and not enough of transit and and active transportation.
15				There is too large an emphasis on highways and car infrastructure - climate change tells us this simply isn't feasible. More dollars need to be dedicated to means of moving people around the region while drastically reduce carbon emissions.
16	the document is clear, logical, well illustrated; all modes are represented, as are all the areas of the region. the scenario planning at the end is interesting; the performance measure section seems very detailed and thorough.	between on the one hand the stated goals and public priorities and on the other the Universe of Projects that	yes. I am unclear how, when, who the final list of projects that is actually going to be approved from the Universe of projectsor if that has already happened. more clarity on that would help me, at least.	As a planning document, the Connect RVA plan is terrific. Interesting, well-illustrated, multi-modal images and contentgood stuff. What I cannot reconcile is that the Goals of the Plan (safety, environment, land use, equity, accessibility, economic development and mobility (further defined as maintenance)), and the clearly stated preferences of the public (bike/ped; transit; maintenance; rail; transit; with highway expansion trailing at half the level of support of transit) are simply not reflected in the Universe of Projects where two-thirds of the projects and the funding is allocated to new and expanded highways. Not even maintenance, but new and expanded highways.
17				i did have one additional comment. in the section on performance measures and metrics, you compare levels of investment based on travel times what happens to a 30-minute car trip, bike trip, walk trip. But you use 45 minutes as the trip time for transit. why this inherent bias to start with, and wont doing this just exacerbate the divide between transit and other modes? after 20 years and \$1.5bn of investment, i'd like transit to be as timely and efficient as any other modeif not more so. and if it isn't, then fixing it is a priority.

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18		Yes.	Maybe have the map use different color lines to indicate road projects, public transportation and bike/pedestrian projects. Or have a list by type of project. I was interested in learning about bike/pedestrian projects, but didn't want to click on every line on the map.	
19	The plan is still largely silent on racial equity. I appreciate the designation and use of Equity Emphasis Areas (EEAs), however it is not apparent how much priority that is really given in what was ultimately selected. For instance, the bike and transit projects seem to have a much higher impact on EEA accessibility. We know now that accessibility to jobs in these areas is poor so why not make this a much higher priority? In the equity funding EEA analysis I am bewildered. Isn't the major project in one of these areas the I-64 widening? Doesn't that create NEGATIVE environmental/EJ/equity impacts for these communities? It is presented though as a positive. When you take that project out of the value of investment, it seems that these areas are not prioritized in funding. Am I reading this correctly?	The level of detail in the performance measure, build/no build/base discussion was useful but also confusing in that it wasn't entirely clear always what was included or	I appreciated the interactive map that was provided earlier in the process. Having a map of projects within report itself would be useful to show the comprehensive picture. It would also be useful to know what % of regional, local, state and federal funds is supporting these different projects, ie. where are our CVTA funds going?	I appreciate the commitment to improve multi-modal access and TOD at Staples Mill station. The discussion of rail within the report overall was very helpful. A huge amount of time and effort has gone into the report, which is appreciated. However, the final report would benefit from an executive summary that clearly illustrates modal split for investment, benefits, and WHO benefits / pays.
20	Consider proposed Ashcake Road overpass of the CSX railroad tracks in Ashland.	Yes	It was not clear that the proposed Hill Carter Parkway connection to the I-95 interchange was temporary to allow for the construction of a diverging diamond at Rt. 54 and I-95.	Maps were great but you had to enlarge them to see many of the proposed projects in an area.

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21	implemented with any eye toward accountability. Another note - it would be great to include more	The content makes sense but there is a lot of detail on the planning process; I would like to see the details about specific projects outlines more prominently.	Regarding public engagement about the document, people need to better understand how this relates to them and why they should care about a plan with such a long-term timeline. Better advertising might also draw more people to in-person public meetings.	maintaining which roads would be helpful. Additionally, will the allocation of funding for maintenance be based on need or some other criteria?
22			the maps are hard to access.Lines in eastern Goochland look like doodle	very little in this for Goochland County. More justification for giving most of the funding to larger jurisdictions

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23	There is no acknowledgement of induced demand and the ways in which \$5 billion in road expansion projects will reinforce or create many problems in future decades, including more impervious surface, more lane miles to maintain, encouraging more driving and caroriented development, more pollution, etc. The spending priorities are not in line with the stated goals of the plan and the feedback given by citizens, particularly as concerns equity, multimodality, safety, maintenance, and an emphasis on non-car transportation. A good example of this is the statement that the highway network would "come to a standstill" if not expanded given increasing population. This is true only if you assume and continue to encourage single occupancy vehicles as the default mode of transportation. We all know that is unsustainable and not at all in line with the very apparent and pressing need to address climate change. A appreciate that transit, bike and pedestrian projects do get some attention, but the plan is far from visionary and far from what we need to create a sustainable transportation system for the region.			

From: Ben Campbell

bcampbell@richmondhillva.org>

Sent: Thursday, August 26, 2021 10:04 AM

To: Sulabh Aryal Cc: Chet Parsons

Subject: LRTP accomplishment

Mr. Aryal,

Congratulations on an incredible product. I am in awe of the scope of your work. I hope that you will pursue the two issues I raised today: the impact on vehicle miles travelled by replacement of cars by public transit, and the expression of environmental results in net fashion — surely increase in vehicle miles travelled is a negative environmentally, offset by certain positive things — it may be necessary but we should not hide it.

All of this being said, we are all the beneficiaries of your excellent vision and attention to detail. We could not make suggestions if you had not done such a comprehensive job. Thank you.

Ben Campbell

From: O'Keeffe John < john.okeeffe@ridefinders.com>

Sent: Thursday, August 26, 2021 3:53 PM

To: Sulabh Aryal Cc: Chet Parsons

Subject: RE: 2 quick questions from todays Connect2045 LRTP

Thanks for your responses Sulabh. I am hopeful we can get micotransit in the area very soon.

John

From: Sulabh Aryal <SAryal@planrva.org> Sent: Thursday, August 26, 2021 3:51 PM

To: O'Keeffe John < john.okeeffe@ridefinders.com>

Cc: Chet Parsons < CParsons@planrva.org>

Subject: RE: 2 quick questions from todays Connect2045 LRTP

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

John,

Thank you for your query. See my responses in **red** below.

Sulabh

Check out ConnectRVA2045.org and help us update our regional transportation plan!



Sulabh Aryal, AICP

Transportation Planning Manager

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saryal@PlanRVA.org

9211 Forest Hill Avenue, Suite 200 Richmond, Virginia 23235 www.PlanRVA.org

From: O'Keeffe John < john.okeeffe@ridefinders.com>

Sent: Thursday, August 26, 2021 11:27 AM **To:** Sulabh Aryal <<u>SAryal@planrva.org</u>>

Subject: 2 quick questions from todays Connect2045 LRTP

Sulabh,

Good Morning. I wanted to reach out to you regarding a few questions I had regarding the Connect2045 LRTP.

When you all were looking at the congestion was COVID given consideration in looking at the data as far as fewer cars on the road and the possibility of more remote work being the new future?

The short answer is No. COVID was not given any consideration as all the data and tools we used were already build before COVID. In the plan document, we have acknowledged the fact that all our data and projections are based on pre-COVID numbers and any COVID implications were not considered.

Normally, when we do long term projections things like economic booms and recessions are considered part of the projection cycle and are zeroed out. COVID however, is a special case. Though we know that there have been changes in traffic patterns in short term, at this point we do not know what will be a long -term impact in 20 years from now.

When you had the accessibility analysis up under transit was micro transit considered as build no build? I am sure you are aware GRTC is looking at this option and speaking with localities about how this could look for them.

Micro transit was not included. We only calculated accessibility based on the projects which were listed in the constrained plan. Once micro transit becomes reality it would be a good time to recalculate accessibility and see if there are any measurable net benefits. Thanks for raising this question.

Thanks as always for your help.

John O'Keeffe

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Ridefinders is a Division of GRTC Transit System



From: Susan Miller < susan.miller1417@gmail.com>

Sent: Sunday, August 29, 2021 6:19 PM

To: ConnectRVA2045 **Subject:** Public comments

Connect RVA2045

I am opposed to any policies or allocation of revenue that increases sprawl in the Richmond metro area. We need to finish the city and county infill. Thus I do not support providing roads that make it more attractive to convert rural or outlying lands to development.

The goals of the plan give an appearance of reasonableness but the apparent allocation of 66% of the funds to roads belies the goals of multimodal transport. Any road based money should be spent for repair of current infrastructure and safety issues. The vast majority of money should go to pedestrian and bike improvements and a major expansion of public transport. We need to decrease the number of cars and the number of miles by car that people drive. The Vision Zero project seeking to eliminate deaths on our roads should take precedence above other items. Thank you for your consideration,

Susan A Miller MD
susan.miller1417@gmail.com
1417 Grove Ave Richmond, VA 23220

From: Bickmeier, Dennis <dbickmeier@richmondraceway.com>

Sent: Tuesday, September 14, 2021 2:53 PM

To: ConnectRVA2045

Subject: Richmond-Henrico Turnpike and Meadowbridge Road

Thank you for this opportunity to provide comments on the Connect RVA 2045 plan. We'd like to commend the Plan RVA staff and leadership on a very thoughtful and comprehensive document which looks at the various transportation needs throughout the region we've now called home for 75 years. We look forward to being a partner in supporting implementation of the plan.

We were particularly pleased to see the inclusion of FHW-81 Meadowbridge Road Widening project in the proposed project list. Meadowbridge Road has become an increasingly important part of the road network serving the Richmond Raceway. Further, with the private development underway now on our former parking lots, and additional development expected in the future, the Meadowbridge Road connector to Interstate 295 is becoming even more important, particularly to keep trucks off of local streets relied on by residents and small businesses, as well as access to a nearby hospital.

We would urge, however, that the project either be broadened to include, or a new project be added, to improve the bridge culvert across the Chickahominy River at the Henrico-Hanover line. As you are likely aware, that vital connection was damaged several years ago, requires continual maintenance and a more permanent fix to the situation there is required. If we are going to take full advantage of the improvements already underway to Richmond-Henrico Turnpike and the ones envisioned in the plan for Meadowbridge Road, that river crossing must also be enhanced. Given the plan's focus on resiliency and emergency services connections, the crossing is an essential part of the regional transportation network which cannot be ignored longer.

We look forward to working with the various stakeholders to do what we can to facilitate this necessary improvement, including donation of rights of way and areas for construction laydown.

Please do not hesitate to contact me directly if I can answer any additional questions about this project.

Sincerely,

Dennis Bickmeier President, Richmond Raceway

From: Trip Pollard <tpollard@selcva.org>

Sent: Wednesday, September 15, 2021 5:03 PM

To: ConnectRVA2045

Subject: Comments on Draft ConnectRVA 2045 LRTP

Attachments: ConnectRVA2045-comments on draft plan -SELC.pdf

Attached are the Southern Environmental Law Center's comments on the draft LRTP. Thanks!

Trip Pollard Land & Community Program Leader tpollard@selcva.org

Southern Environmental Law Center 530 East Main Street, Suite 620 Richmond, VA 23219

Office: (804) 343-1090 southernenvironment.org



September 15, 2021

connectrva2045@planrva.org BY EMAIL

Re: Draft ConnectRVA 2045 Long-Range Transportation Plan

As a member of the ConnectRVA 2045 Advisory Committee, and on behalf of the Southern Environmental Law Center, I would like to provide the following comments on the Draft ConnectRVA 2045 Long-Range Transportation Plan (LRTP).

We appreciate the opportunity to participate on the Advisory Committee, as well as staff's work on this plan and in responding to a number of issues raised by myself and other Committee members. Among other things, this includes positive changes to the draft plan's Vision, Guiding Principles, Goals, and Objectives.

In addition, the draft plan contains useful analysis, important discussions, and many projects we support. Among items of note, we applaud the discussion of the importance of reducing vehicle miles traveled (VMT) and enabling more residents to travel by alternative modes such as transit, biking, and walking, both to reduce transportation pollution and to create a more equitable and accessible transportation system. We also support the inclusion in the fiscally-constrained projects list of a number of significant transit and active transportation projects.

However, the draft plan suffers from serious shortcomings. Of primary importance, we do not support the heavy emphasis in the constrained project list on highway construction and expansion. Despite the draft plan language about the importance of alternative modes, as well as the results of public input surveys clearly prioritizing transit and active transportation, equity, and environmental quality over highway expansion and congestion mitigation, the lion's share (over 85%) of funding in the draft plan for regional capital investments appears to be allocated to highways. For the most part, public input appears to have been largely ignored in the ultimate project list.

The emphasis on highways is particularly troubling in light of the current climate crisis, with extreme weather increasing, harming our health, our communities, our economy, and our environment. And the adverse effects of climate change and other transportation-related air pollution are borne disproportionately by under-resourced communities and people of color. Transportation is the largest source of climate change-driving carbon dioxide (CO₂) pollution

Charlottesville Chapel Hill Atlanta Asheville Birmingham Charleston Nashville Richmond Washington, DC

¹ See Draft LRTP at 73-76.

 $^{^2}$ Draft LRTP, *Technical Report F* at 17 (showing approximately \$5.36 billion out of a total of \$6.2 billion in regional investments allocated to roadway projects, compared to \$464.5 million for transit and \$271.7 million for active transportation).

both in Virginia and nationwide,³ and the majority of transportation pollution comes from passenger cars and trucks.⁴ Achieving the environmental and equity elements of the draft LRTP's Vision, Guiding Principles, Goals, and Objectives requires a much greater shift towards funding clean transportation alternatives.

The emphasis on roads in the draft plan is even harder to justify in light of the limited benefits planned highway expansions are expected to provide in reducing traffic congestion in the region. According to the draft, the construction of 188 additional lane miles in the 2045 Build scenario over the No-Build scenario is expected to result in just a 1% reduction (from 18% to 17%) in congested lane miles in the region.⁵

Going forward, a much greater share of the region's long-range plan must be allocated to alternative modes to meet the needs of the region's residents and businesses, create a more equitable and accessible transportation system, and for the Richmond region to do its part to address the climate crisis.

In addition to these fundamental concerns with the draft plan, we would like to provide the following more specific comments and suggestions.

- **Greenhouse gas emissions:** While the draft plan mentions the need to decarbonize transportation, the urgency of this issue warrants greater discussion and consideration. For instance, the plan should specifically mention that the Commonwealth has established greenhouse gas reduction goals to achieve net zero emissions across all sectors of the economy—including transportation—by 2045,⁶ as well as the net zero by 2050 goal adopted by the City of Richmond. CO₂ emissions should also be included in the plan's assessment of environmental benefits and in future scenario planning, as noted below.
- **Fiscal constraint funding summary:** The constrained projects list is undoubtedly one of the most important parts of the plan, yet it only appears to be included in one of the technical appendices. The draft plan buries this information and makes it unlikely that many members of the public will be aware of what projects the plan would actually advance. Indeed, there does not even appear to be a basic summary of the project types and overall funding amounts being recommended for funding in the constrained list as part of the main LRTP document. This type of basic summary should be incorporated into both the Executive Summary and in Chapter 6 of the document, and the full constrained list should be included at the end of the main LRTP document.

³ U.S. Energy Information Administration, *Table 4: State energy-related carbon dioxide emissions by sector*, *available at* https://www.eia.gov/environment/emissions/state/; U.S. Environmental Protection Agency (EPA), Sources of Greenhouse Gas Emissions, https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions (last visited Sept. 9, 2021).

⁴ U.S. EPA, Fast Facts on Transportation Greenhouse Gas Emissions, https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions (last visited Sept. 9, 2021).

⁵ Draft LRTP at 94.

⁶ See Va. Code § 45.2-1706.1(A).

⁷ The project category-based summary that is provided in Chapter 5 appears to only address the total universe of projects and needs considered for funding in the plan. While this information is helpful, similar information about the types of projects actually proposed to be funded seems more important to include.

• VMT reduction: Reducing VMT is a key part of reducing transportation emissions of CO₂ and other air pollutants, and we strongly support the inclusion of VMT per capita as a performance measure in the draft plan. However, we continue to have concerns with the analysis conducted for this measure, as well as the limited information provided on this analysis in the plan. Results for this measure are only provided in the technical appendices and only show overall results for the entire 2045 Build scenario—showing a very modest overall 18-mile reduction in annual per capita VMT.⁸

This is a very modest reduction in VMT that again does not get us where we need to go to reduce transportation pollution. And even this number is questionable. Numerous studies have found that increasing lane miles tends to result in comparable increases in VMT, and that congestion relief often vanishes within a short time due to the additional traffic generated. With the considerable lane mileage proposed to be added in this plan (188 miles more than the No-Build), it is hard to imagine this would not result in substantial VMT increases.

Further information provided by staff following a recent Advisory Committee meeting suggests that most of the VMT reduction shown to result from the 2045 Build scenario may be coming from the small number of transit projects included in the plan. Given the counter-intuitive results of the overall VMT analysis for a plan so heavily focused on capacity expansion, it is imperative that the plan provide further explanation of how these results were reached, as well as a breakdown based on project type (such as road widening, interchange improvements, and transit) to give the public and decision-makers a better sense of which improvements are positively or negatively affecting this measure.

• Electric vehicles: Accelerating the adoption of electric vehicles (EVs) is also a key solution to reduce transportation-related emissions, and is likely to become an increasingly-important component of regional transportation planning. We appreciate the draft plan's discussion in Chapter 4 of EVs and some of the potential barriers to more widespread adoption. That said, there are several recent developments related to EVs that are not mentioned in the plan, but probably should be, including a number of significant actions taken in the 2021 General Assembly session, ¹⁰ as well as the significant investments the Commonwealth is making in EVs and charging infrastructure through its Volkswagen settlement funds. ¹¹ Data and mapping on the extent of existing public and

⁸ Draft LRTP, *Technical Report G* at 9-10.

⁹ See Todd Litman, Victoria Transport Policy Institute, Generated Traffic and Induced Travel – Implications for Transport Planning at 6 et seq. (Apr. 2021), available at https://www.vtpi.org/gentraf.pdf.

¹⁰ See, e.g., H.B. 1965 (adopting an Advanced Clean Cars Program, including a zero-emission vehicle program), H.B. 1979 (establishing a new EV rebate program for the purchase of new and used EVs), H.B. 2118 (creating a Virginia Electric Vehicle Grant Fund to help fund electrification of school buses and other fleet vehicles), S.B. 1223 (requiring a study of Virginia's EV charging infrastructure in the Virginia Energy Plan); H.B. 2282 (directing the State Corporation Commission to develop recommendations to help accelerate widespread EV adoption).

¹¹ See Virginia Department of Environmental Quality, Volkswagen Settlement Agreement, https://www.deq.virginia.gov/get-involved/topics-of-interest/volkswagen-settlement-agreement (last visited Sept. 9, 2021).

private EV charging stations in the region are also readily available, and it would be helpful to incorporate this information into the plan. 12

- Climate resiliency: The Richmond region is already grappling with the growing effects of climate change, and we appreciate the discussion in Chapter 4 of the draft plan of potential impacts on natural resiliency features such as wetlands and floodplains, as well as the need to ensure the resiliency of our infrastructure. One point of concern, however, is in the section on "Special Flood Hazard Areas" on page 66, which states that "Only infrastructure designed to flood or to be located above the anticipated level of flooding should be constructed in these areas." We urge you to modify this language to make clear that floodplains should first be avoided to the greatest extent possible, and only then should the considerations noted above come into play.
- Carbon sinks: Another aspect that should be added to the discussion of "Environmental Resources & Mitigation" on pages 64-65 is the benefits of wetlands, forests, and other natural areas in serving as "carbon sinks" that help to absorb and store CO₂ from the atmosphere, as well as the potential adverse effects of destroying them—which can result in additional emissions attributable to a project. The loss of carbon sinks is another consequence of the over-emphasis on highway construction in the draft plan.
- Environmental benefits: While we strongly support the inclusion of emissions of volatile organic compounds (VOCs) and nitrogen oxides (NOx) in the plan's performance measures, we are concerned that these appear to be the only two factors assessed to determine the overall "environmental benefits" of the 2045 Build scenario. There are many other factors that would need to be considered to determine the environmental effects of this plan, including emissions of other criteria pollutants and mobile source air toxics (MSATs), and CO₂ emissions. Properly accounting for climate change-related costs and benefits requires consideration of various effects related to carbon sinks, heat islands, and community resiliency, among other things. And the environmental damage caused by projects to resources such as wetlands, streams, farms, and forests can be significant, yet is not reflected in the "environmental benefits" calculation—again giving a misleading picture of the net environmental benefits of a project.

Given the extremely limited scope of this measure, we encourage you to add further discussion of its limitations in Chapter 7 and/or rename this measure to something that better reflects its focus on VOCs and NOx emissions. Going forward, we also encourage you to add CO₂ emissions and explore additional environmental components that can be incorporated into this measure.

• Scenario planning: Finally, the draft plan mentions that scenario planning will be a component of the next long-range transportation plan. We support this step and, in line with our comments above, recommend that this effort include future scenarios based on

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¹² See, e.g., U.S. Department of Energy, Alternative Fuels Data Center, Fueling Station Locator, https://afdc.energy.gov/stations/#/find/nearest.

illustrating the types and extent of transportation and/or land use changes that would be needed to achieve certain levels of future GHG emissions reductions across the region.

Thank you for your consideration of these comments

Sincerely,

Trip Pollard

Land & Community Program Leader

From: Sebastian Shetty <sebastian@psgrichmond.org>

Sent: Friday, September 17, 2021 12:40 PM

To: ConnectRVA2045 **Subject:** PSG Comments

Attachments: ConnectRVA 2045 Draft Plan Comment Letter.pdf

Hello,

I'm aware that the comment period ended yesterday, but I am hoping that you will permit me to submit the attached comment letter regarding the draft ConnectRVA 2045 plan on behalf of Partnership for Smarter Growth.

Thank you, Sebastian Shetty

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Sebastian Shetty



Coordinator for Policy and Administration Partnership for Smarter Growth sebastian@psgrichmond.org | (757) 390-9930 https://www.psgrichmond.org/



Dear PlanRVA Officials and Staff,

Upon review of the draft long-range transportation plan released in August, we are deeply concerned with the degree to which allocated funding is skewed towards expansion of highways and roads rather than towards fix-it-first road investments and the transit, bicycle and pedestrian infrastructure our region deeply needs. As demonstrated by the public participation efforts documented in the plan, residents of our region are strongly in favor of investing in infrastructure that supports a healthier, more equitable, and more sustainable transportation system; the overemphasis of roadway capacity needs, particularly in suburban-rural interface areas will fuel speculative auto-dependent development and serves to undermine the Richmond region's progress towards the goals outlined by the public.

As established in the plan, the "build" scenario includes construction of 232 new miles of roadway, making up the vast majority of transportation projects in the LRTP and associated Constrained Project List. By comparison, transit funding, active transportation infrastructure, and pedestrian safety improvements make up a small fraction of the overall spending outlined in the plan. The plan highlights the status quo in which roughly 99% of trips in the Richmond region are made using private vehicles, and according to its own projections this number will not be meaningfully reduced even after the plan's implementation. With only 9 transit improvements (\$464.5 million) out of a \$5 billion dollar project list, this is a regrettable, but logical outcome.

In terms of the plan's own evaluation, one measure of success included is the total savings the region can expect to gain by making the proposed investments, divided into "Operational", "Safety", and "Environmental" savings. While vehicle miles traveled (VMT) and certain criteria air pollutant emissions are considered within these evaluation metrics, there is no reference to carbon or other greenhouse gas (GHG) emissions, nor is there explicit discussion of VMT reduction as one of the primary goals of the plan. In fact, the environmental savings the plan describes as a result of the specified investments only make up just over 5% of the total benefits outlined. At a time when the existential threat of climate change has never been more apparent, and when the public has clearly specified environmental concerns as the second-most important factor in any new transportation plan, this represents a major shortcoming in our regional transportation planning process.

Another evaluation metric included within the plan is the economic impact the region can expect to receive resulting from the specified investments, projected at \$15 billion in total. The plan fails to include any analysis of the economic benefits of alternatives beyond "build" and "no-build", such as scenarios in which a greater percentage of funding is allocated towards transit and other explicit VMT reduction strategies. While highway connectivity plays a role in the region's economic vitality, it has been the case for many years that the return on investment from highway expansion has been declining, and as demonstrated in other regions of the United States, higher levels of investment in transit have the potential to provide returns far exceeding those of traditional roadway projects.

The plan further highlights the degree to which projects selected serve "Equity Emphasis Areas", implying that the plan is successful in addressing the needs of low-income and otherwise marginalized populations across the region. While we commend the inclusion of equity-based metrics, the manner in which the plan's equity analysis is conducted falls far short of describing the actual equity impacts of the described transportation investments. Rather than considering the type of projects included, the plan considers projects that are physically located within Equity Emphasis Areas as serving equity goals, despite the fact that the least-advantaged residents of the region are disproportionately likely to lack access to private vehicles, or to be able to afford to travel by means other than transit, biking, and walking. Much like an eight-lane highway is of little use to an individual with no car in getting to work, a highway expansion project in a neighborhood in which a significant portion of the population does not drive does little to advance equity, or access to opportunity. Meanwhile, a significant proportion of the road expansions are in outer areas where they would provide little benefit to most equity areas. While the plan does address impacts to employment access resulting from planned investments, it does not explicitly address how the proposed projects will increase connectivity between marginalized areas and their wealthier counterparts, a metric that has been demonstrated to play a significant role in the potential for upward mobility among low-income residents.

Taken as a whole, the ConnectRVA 2045 LRTP fails to meet the needs of the region as articulated in the hundreds of comments received during each stage of the planning process. The public established a clear preference for investments in transportation infrastructure that reduce our region's environmental impact, increase equity and connectivity, and provide more choices for travel beyond merely driving private vehicles. As implied in the plan itself, the projects selected and the methods used to evaluate them fail to prioritize these stated preferences, and further fail to make the most efficient use of our limited resources as measured by how many people (not just vehicles) can physically move through a given space. Stated in terms included within the plan itself, only \$464.5 million out of the more

than \$5 billion dollar list is allocated to transit; no substantial changes to the status quo in which 99% of trips are made by private vehicle are advanced; only 5% of the projected benefits are from the "environmental" category; and the result of the "build" scenario at completion is only a 1% decrease in traffic congestion as compared to a "no-build" scenario. The role of public participation in public processes is to place some degree of decision-making power where it belongs: in the hands of the people. This LRTP and its associated Constrained Project List are at best ignoring, and at worst directly undermining, the desires of the public and the need to address the impending climate crisis. As currently drafted, this LRTP is reflective of the fundamental structural challenges involved in attempting to thoroughly meet the needs of the moment, which necessitate a wholesale reconsideration of the status quo.

Thank you for your hard work on the drafting of our region's LRTP, and for the opportunity to weigh in through each stage of the planning process. We look forward to staying involved in planning processes moving forward, and to working together to create a stronger, more sustainable Richmond region.

Sincerely,

Partnership for Smarter Growth



Is anything missing in the draft ConnectRVA 2045 document? Does the content make sense? Is the level of detail sufficient? Do you have any recommendations to make the document easier to read or more accessible? Additional comments Addit

	Draft ConnectRVA 2045 Public Review
Is anyth	ning missing in the draft ConnectRVA 2045 document?
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	Beth Watkins Phone Number 804 347-9286





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- (Does the content make sense? Is the level of detail sufficient? Certain sections are Sufficient, yes
	The suggestion I have is for a larger print or font so the locument is a bit tasier to read.
	Additional comments I would like to know the Status of the Tyler Potterfield Bridge SO we could have access for handicap people.
	Name Brian Montgothery Phone Number (804) 261 - 4952 Zip Code 13117



Accommodations

PlanRVA welcomes all community members to participate in our processes and is committed to providing reasonable accommodations to make meetings accessible for everyone.

While not all accommodations can be provided without advance notice, PlanRVA is happy to provide all possible reasonable accommodations on-site for our meetings. Please fill out the following form:

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- O Documents read
- Request escort

other Larger print

Mobility Services/Aids

- Walking escort
- Wheelchair escort
- Extra-wide wheelchair
- Transfer assistance
- Other N/A

Hearing Services/Aids

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Other ______

Other Needs/Notes

- O Cognitive impairment
- Sound sensitivity
- Speech impairment
- Uses hearing
- O Uses service animals

- Uses notepad
- Uses walker
- **♥** Uses cane
- Requires additional time
- of Other USCS Wheel chair

Requests

- Speak loudly
- Speak slowly
- Make eye contact
- Reads lips

- O Speak on right side
- Speak on left side
- Other MNG

