

2045 LONG-RANGE TRANSPORTATION PLAN CANDIDATE PROJECTS: COMMENTS RECEIVED

Long-Range Transportation Plan Subcommittee
March 4, 2020

Theresa Brooks
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2045 LRTP CANDIDATE PROJECTS: COMMENTS



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February 13, 2020

Ms. Theresa Brooks
Transportation Engineer III
Hampton Roads Transportation Planning Organization

BY EMAIL

Re: Draft Candidate Projects for the 2045 Long-Range Transportation Plan

Dear Ms. Brooks:

The Southern Environmental Law Center (SELC) would like to provide the flowing comments on the Hampton Roads Transportation Planning Organization's (HRTPO) draft list of candidate projects for the region's 2045 Long-Range Transportation Plan (LRTP). SELC is a non-partisan, non-profit organization that works throughout Virginia to promote transportation and land use decisions that strengthen our communities, protect our environment, and improve our quality of life.

We appreciate the opportunity to provide input at this early stage of HRTPO's long-range planning process. Thoughtful transportation and land use planning will be especially important in the coming years given the many challenges facing the Hampton Roads region. Among other things, the recent VTrans Mid-term Needs Assessment indicates a growing need to expand and provide more equitable access to public transit and non-motorized transportation options throughout the region, particularly in its urban cores.¹

Hampton Roads also faces some of the most serious climate change-related threats from flooding and sea level rise in the country. As a result, it is essential that the long-range planning process include careful consideration of these risks to the region's transportation infrastructure, and that projects are sited and designed to prevent further loss of natural resiliency features such as wetlands and floodplains that help slow and store flood water and provide communities with valuable storm protection. The threats faced by Hampton Roads also underscore the need to make significant progress in this LRTP toward reducing the region's greenhouse gas (GHG) emissions from the transportation sector—the largest source of GHG emissions in Virginia.

We strongly support the inclusion in the draft candidate list of many projects focused on expanding residents' travel options as well as advancing cleaner transportation modes, including several key projects to expand the region's public transit and passenger rail networks and a host of active transportation improvements. However, in viewing this draft candidate list as a whole and in light of the challenges and threats noted above, we are concerned to see its overwhelming focus on highway expansion. Indeed, highway projects comprise 183 out of 309 total projects on the list (not including interchange and bridge improvements), and the vast majority of these

¹ Office of Intermodal Planning and Investment, Executive Summary and 2019 Mid-Term Transportation Needs, Hampton Roads Construction District at 23 et seq. (Jan. 2020), available at http://www.vtrans.org/resources/VTrans_Midterm_Report_HamptonRoads.pdf.

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February 24, 2020

Mr. Morgan Butler, Senior Attorney
Mr. Travis Pietila, Staff Attorney
Southern Environmental Law Center
201 West Main Street, Suite 14
Charlottesville, VA 22902-5065

Re: Draft Candidate Projects for the 2045 Long-Range Transportation Plan

Dear Mr. Butler and Mr. Pietila,

Thank you for participating in the HRTPO's 2045 Long-Range Transportation Plan (LRTP) public comment and review period. SELC's comments, along with other public input, help to inform HRTPO of public and stakeholder concerns and questions. Knowing your concerns and questions help us to consider and address them during the LRTP planning process.

We agree that long-range planning should include careful consideration of potential risks to the region's transportation infrastructure and have developed recommendations to enhance our Project Prioritization Tool (tool designed to objectively measure effectiveness, economic vitality, and viability of projects) to include resiliency and other environmental measures. The Project Prioritization Tool will be used to evaluate and rank projects to be considered for inclusion in the 2045 LRTP (to learn more about the HRTPO Project Prioritization Tool and the recommended enhancements, please visit <https://www.hrtpo.org/page/project-prioritization/>).

With regard to SELC's comments on the quantity of highway candidate projects, I'd like to provide some background on the candidate list. Candidate projects are proposals for the HRTPO to consider for potential inclusion in the LRTP. These proposed projects are subjected to a rigorous evaluation process and fiscal constraint (demonstration that sufficient funds will be available to cover project costs). Less than half of the 300+ candidate projects will ultimately make it into the Plan. The candidate projects came from a variety of sources, including the current 2040 LRTP, 2040 Vision Plan, other HRTPO planning studies, HRTPO advisory committees, and public input. Therefore, the quantity of any particular group of candidate projects is not a reflection of a preferred mode, but a result of the unrestricted collection process.

The HRTPO is committed to planning a balanced, multimodal transportation system through our LRTP and other planning efforts, and the final 2045 LRTP will support a multimodal system in which all transportation modes, including transit, active transportation, etc., are represented. In addition, over the past few years, HRTPO staff has been coordinating with regional stakeholders and the public to develop a regional active transportation plan. *Linking Hampton Roads, A Regional Active Transportation Plan*, is a framework to help improve safety and connectivity for non-motorized modes like walking and bicycling, and to promote more active and healthy lifestyles. The HRTPO is also a strong advocate for dedicated transit funding to help improve the quality of our regional transit system and promote transportation choices for our residents.

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- Climate Change, Flooding, and Sea Level Rise:
 - “...essential that the **long-range planning include careful consideration of these risks** to the region’s transportation infrastructure...” and that these projects should be “sited and **designed to prevent further loss of natural resiliency features** such as wetlands and floodplains that help slow and store flood water and provide communities with valuable storm protection.”
 - “...need to make significant progress in this L RTP toward **reducing the region’s greenhouse gas (GHG) emissions** from the transportation section”
- HRTPO Response: Project Prioritization Enhancements to include Resiliency and Environmental Measures
- Include as a resource during 2045 L RTP Environmental Mitigation Consultation

SUMMARY OF SELC COMMENTS (CONTINUED)



- Strongly supports *“many projects focused on expanding residents’ travel options as well as advancing cleaner transportation modes, including several key projects to expand the region’s public transit and passenger rail networks and a host of active transportation investments.”*
- Concerned to see *“overwhelming focus on highway expansion”*
- HRTPO Response: quantity of any particular group of candidate project is not a reflection of a preferred mode, but rather a result of the unrestricted collection process
 - Final 2045 LRTP will support a balanced, multimodal system in which all transportation modes are represented
 - Other HRTPO multimodal planning efforts

- SELC: projects to consider removing (or revising):
New Route 460 (Suffolk to Zuni)
 - SELC Concerns:
 - *“expensive,” “limited benefits,” “serious permitting issues due to their severe impacts on wetlands and other resources”*
 - Refined improvements focus on targeted upgrades to existing Route 460
 - Candidate Project source: 2040 LRTP (study) and FTAC (via 2040 LRTP)
 - **Suggestion:**

- SELC: projects to consider removing/revising:
Route 460/58/13 Connector
 - SELC Concerns:
 - Recent VDOT study halted because *“existing capacity should be able to handle expected travel demand through 2040”* and *“VDOT further found that each of the options under review would have enormous impacts on wetlands in the corridor”*
 - Candidate Project source: 2040 LRTP (RPP), FTAC, VDOT
 - Safety Concerns at SPSA and Airport
 - **Suggestion:**

- SELC: projects to consider removing/revising:
Southeastern Parkway and Greenbelt
 - SELC Concerns:
 - FHWA *“terminated the environmental review process for this project after decades of study in which federal agencies raised serious and repeated concerns with its impacts on wetlands and other resources – essentially finding this project unpermittable.”*
 - These issues *“are even greater today in light of the immediate threats posed by climate change and the need to protect wetlands as a resiliency resource for local communities.”*
 - Candidate Project source: 2040 LRTP (study), public submission
 - **Suggestion:**

- SELC: projects to consider removing/revising:
Nimmo Parkway Phase VII-B
 - SELC Concerns:
 - Project *“raises serious concerns regarding impacts on wildlife populations and habitat” and “threatens to exacerbate local flooding both to the north and the south of the proposed parkway by restricting the normal bi-directional flow of water in response to winds, tides, and rainstorms, and by isolating wetlands that help absorb floodwaters.”*
 - *“Improving the existing Sandbridge Road corridor is a far less damaging alternative that should be pursued instead.”*
 - Candidate Project source: Virginia Beach
 - **Suggestion:**

- Other noted SELC concerns: **Bowers Hill Interchange**
 - Recommends *“close scrutiny of any proposals for the Bowers Hill Interchange”*
 - Recognizes *“the importance of this interchange to the region’s transportation network”*
 - Located in a sensitive area containing several *“environmental justice communities, substantial wetlands, streams, and floodplains”* and it is in close proximity to the Great Dismal Swamp
 - *“Expansion of this vast interchange could also have significant effects in increasing vehicle miles traveled and related GHG emissions”*
 - *“Communities and potential impacts must be carefully considered in relation to any potential improvements to this facility”*
- Forwarding concerns to Bowers Hill Working Group

- I-64 HOT Lanes (Exit 242 to New Kent County Line) – Public Submission
 - Project outside of Express Lanes Network concept endorsed by the HRTPO Board (HRTPO Resolution 2019-06)
- I-64 Peninsula (8-Lane Option, Bland Blvd to New Kent County Line) – 2040 LRTP Vision Plan
 - I-64 Peninsula Regional Priority Projects – Segments 1-3
 - I-64 Peninsula Segment 4 Candidate Project (widen to 6 lanes)
- Route 460/58/13 Connector (8-Lane Widening, Bowers Hill to Suffolk Bypass) – 2040 LRTP Study

RECOMMENDED ACTION



- Discuss potential modifications to the 2045 LRTP Candidate Project list and/or project descriptions
- Update list as necessary