



Dear Ms. Srivastava,

February 17, 2012

Please accept this public comment on the draft of the Metropolitan Planning Organization's Long Range Transportation Plan: *Direction 2040*.

Livable Memphis, a program of the Community Development Council of Greater Memphis, is a grassroots coalition representing participation from over 125 neighborhoods, virtually every zip code, across the greater Memphis region. Our members come from all types of communities throughout the region from urban to suburban to rural. With a shared vision for choice neighborhoods that are thriving, livable and unique, we advocate for equitable distribution of resources, reinvestment in existing neighborhoods, and increasing public participation in decision making processes that affect the quality of life in our communities. Through this lens, I asked our stakeholders to join me in reviewing the draft. With their input, I have compiled this review of *Direction 2040*.

While my specific comments are outlined below, overall, the LTRP raises three areas of deep concern:

- The Implementation Plan does not match goals or vision of the LRTP.
- The Implementation Plan does not match the desires of the public.
- The Implementation Plan is not equitable.

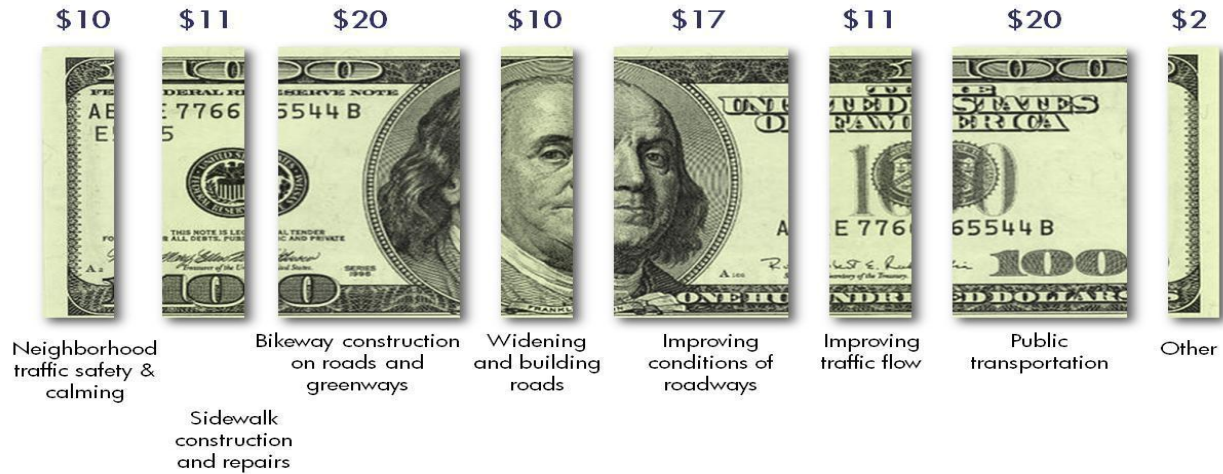
#### GOALS & VISION:

We commend the MPO on the Goals and Vision outlined in the Executive Summary and Chapter 1; especially the goals to increase safety; develop a multimodal network; improve mobility and accessibility using a broad range of solutions; minimize adverse social, economic and environmental impacts; support sustainable land use; equitable distribution of funds throughout the region; preserve and enhance existing facilities; and encourage regional collaboration. Unfortunately, the Implementation Plan and Horizon Year tables and maps, falls short of these goals. In fact there seems a complete disconnect between the today's vision language and the vision for the network of the next 25 years. **We would like to see an additional column for the Implementation Plan project lists that indicates for each project the specific goal(s) the project addresses/supports.**

#### PUBLIC PARTICIPATION:

While we were pleased to see that there was robust public participation, there is no indication of if and how public input was incorporated into the LRTP. For example, the public highly valued transit and walkability, yet the projects listed in the Horizon Plan do not reflect these values. In Chapter 2, responses to the public survey clearly show that the public wants to prioritize funding bikeways and public transit (\$20 each out of \$100 total) vs. widening and building roads (\$10 per \$100 total.)

*About Livable Memphis: Representing over 125 greater Memphis neighborhoods, Livable Memphis promotes the development and redevelopment of healthy, accessible, and economically sustainable communities. We do this by educating citizens, empowering neighborhoods, and advocating for public policies that cultivate a vibrant Memphis. We focus on mitigating urban sprawl, directing reinvestment to existing neighborhoods, and advocating for accessible public and active transportation options. Livable Memphis is a program of Community Development Council of Greater Memphis.*



The projects listed in the draft LRTP do not reflect these desires. Additionally, The LRTP does an excellent job of describing the “Chips” game, and the workshop I attended was very engaging with the maps filled with public input. It is understandable that public opinion may not always be in alignment with the goals for the roadway network, but please provide insight on how public input was taken into consideration. **What were the results from the Chips game and how were they used in developing the Implementation Plan?**

**Can you provide information on how the acquired public input (survey, chips game, meeting comment) was considered in deciding on the projects listed in the LRTP? If it was determined that public desires were not compatible with the goals of the LRTP or the roadway projects listed in the plan, please provide explanation as to why not. Additionally, for comparison, please provide the equivalent categorical dollar breakdown of how projects listed in the LRTP are actually allotted.**

ACCOUNTABILITY:

The Horizon Year tables and the Transportation Improvement Plan (TIP) table shows nearly 250 road widening projects – nearly 90 of those being widened to 6-8 lanes. The existing roadways of this size are dangerous: they are nearly impossible to cross for pedestrians and unfriendly to bicyclists, vehicles drive well beyond the posted speed limit, and access to transit stops is very difficult. These widening directly contradict the desires of the public. 8.11 states that “several strategies were considered before widening.” **Please provide information on what alternative strategies were considered for each project, and why they were considered inappropriate.**

Chapter 3 explains that the Alternative Growth Scenario called Centers and Corridors was created as a response to public and other stakeholder input. Additionally, it is our understanding that the Transportation Planning and Advisory Committee (TPAC) committee expressed concern with the base growth model. Yet, 3.6 states that the “TPB, ETC, and TPAC reviewed the MOE results along with the public outreach activities, the established goals and objectives, and the vision statement (summarized in Chapter 1- Introduction), prior to concluding that the Base Growth Scenario more closely aligns with desired growth patterns than the Centers and Corridors Scenario.” **Can you provide documentation of why the Base Growth Model was deemed more desirable and detailed information on how TPAC recommended this scenario?**

On a much smaller scale, some projects that were listed in the last LRTP (that are not in process) have been removed from draft: Highway 61 in South Memphis, for example. **Generally, what is the protocol of project de-prioritization and where are the justifications documented? Specifically, why was Highway 61 removed?**

TRANSPORTATION EQUITY/ENVIRONMENTAL JUSTICE:

The projects outlined in the Implementation Plan are not equitable. In comparing the maps of population living below poverty and percentage minority by census track (figure 6.5 minorities, figure 6.9 percentage of population below poverty) to the mapping of LRTP projects presents a clear and egregious disregard for equity and justice: these maps are nearly exact opposites of each other! The Department of Transportation complies with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, outlining that operating administrations will “incorporate environmental justice principles (as embodied in the Executive Order) into existing programs, policies, and activities.” **How was environmental justice, specifically in terms of low-income and minority populations, taken into account during the submission and ranking for the projects listed in the LRTP? How is the discrepancy between project locations and these neighborhoods justified?**

LAND USE:

As written, the LRTP is not a true plan. Rather, the LRTP seems to package what the individual municipalities have placed in a queue. Other than in the language in Chapter 1, the LRTP does not include a land-use plan for the region as originally indicated in the abandoned process of developing Imagine 2035. The region needs a real land-use plan to PRECEED a transportation plan. In the LRTP, land-use is addressed within the appendix. 8.5.4 provides recommendations for land-use, complete streets, transit, bike/ped, safety, yet there is *no funding* tied to these. **What are the plans for implementing these recommendations if not outlined in the LRTP? Is it the MPO’s responsibility to develop a regional comprehensive plan that dictates land-use first so that transportation projects are decided based on land-use and vision?**

FISCAL CONCERNS:

Within the urban core and many other jurisdictions within the MPO, existing infrastructure is aging. The LRTP is outlines over *1100 new miles* of lanes. How will we afford to maintain these new miles when municipalities across the region are struggling to maintain the infrastructure we already have? Horizon and Vision project lists in Chapter 8 outline nearly \$8 billion of projects for new roads (out of over \$10 billion total). Figure 8.1 allots only \$2.4 billion for maintenance of all existing infrastructure. **How was the allocation of funds for maintenance vs. new capacity decided? What were the justifications for prioritizing increasing capacity over maintenance?**

Some municipalities are gaining residents while others are losing residents, yet overall, our regional population growth is minimal. Indeed, the LRTP accommodates the municipalities with the region that are growing in population. Yet, this growth is at the expense of improved infrastructure to existing neighborhoods within the region. **From a regional perspective, how can we justify nearly 1200 new road lanes without regional population growth?**

The LRTP outlines programs that have been identified as possible sources of revenue. Some are listed via discretionary funds at the state level. Yet, a number of these sources (TE, SRTS, HSIP, NSBP) are missing from Table 8.3. Some of them are found in Mississippi, but not in Tennessee. **Why the discrepancy between states? Is there a way for MPO’s to influence which programs get funded at the state level?**

PUBLIC TRANSIT:

1.0 of the Executive Summary outlines that project consideration should incorporate public transit and MATA’s planning efforts. On the contrary, considerations for public transit are nearly excluded from the LRTP. **What is the relationship between funding for MATA and the MPO? If MATA does receive funds through the MPO, how could it**

**be prioritized? If MATA does not receive funds through the MPO, how can the goal of a multimodal network be addressed?**

Livable Memphis has developed a number of suggestions for your consideration to help address these concerns:

**1. CREATE A MINIMUM SCORING THRESHOLD:** A minimum scoring threshold for projects submitted to the MPO would ensure that top ranking project do actually meet the goals for the network (assuming that the scoring matrix truly rewards projects that align with the goals and vision.) The scoring matrix for project submitted to the MPO should reward projects that align with the goals and vision for the network. If low scoring projects are rising to the top because they are the best of the projects submitted, then the scoring matrix is not effectively guiding the development of the network. The equivalent of a C- grade remains a C- even if it is superior to a D. If the scoring matrix is correct, a minimum score should be required for any project accepted for implementation. In this fiscal environment – we should not be using public funds on projects that score lower than a B. Competitive and desirable communities, be them residential, commercial or industrial, should not consider low scoring investments acceptable. Municipalities will rise to the challenge.

**2. INCORPORATE PUBLIC INPUT INTO THE DECISION MAKING PROCESS:** Just gathering public input is insufficient. The public should be provided with feedback as to if and how public input was incorporated into the plan. A wide variety of community members provided meaningful feedback during the LRTP update. This public input must be addresses transparently so that a) people know that their voice was heard b) they have an explanation for why their input was not selected for implementation, c) they are updated on how, indeed, their suggestions are being incorporated into the decisions regarding projects to implement.

**3. INCLUDE COMMUNITY MEMBERS ON COMMITTEES THAT HAVE REAL INFLUENCE:** The MPO’s Citizen Advisory Committee is only “advisory” in nature. As confirmed in the results of the LRTP, community input does not really influence decision making. The nebulous “Major Roads Committee” seems to have more influence over outcomes. Some who represents the best interests of the general public should be invited to participate on the “Major Roads Committee.” Likewise the Citizen Advisory Committee should be overhauled to create a meaningful and effect venue for citizens to participate *and influence* MPO decision. For example, the chair of the Citizen Advisory Committee could be the one voting community member of the Transportation Policy Board.

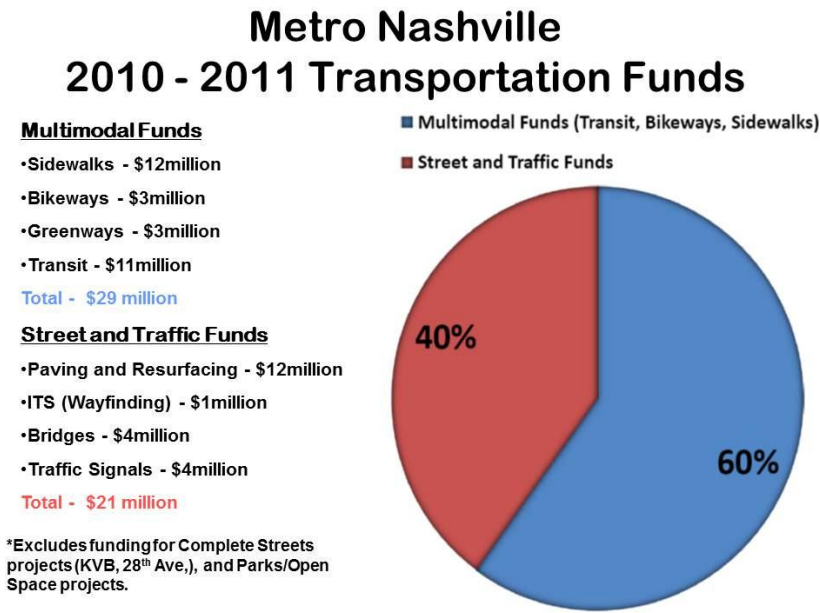
**4. ACCOUNTABILITY/TRANSPARENCY:** There are a number of measures that would increase accountability and transparency. Implementation plan project lists should contain a column that shows how the projects scored relative to the matrix (project points/total points possible.) As mentioned above, in an additional column on the Implementation Plan project lists, please indicate for each project the specific goal(s) the project addresses/supports. According to federal policies, both environmental justice (Title VI of the Civil Rights Act) and bicycle and pedestrian facilities (United States federal policy 23 USC 217(g)(1))should be considered when using federal dollars. An accountability checkbox should be included as part of the ranking of projects:

Is this project appropriate for a bicycle and/or pedestrian facility?  
 Yes  No If not, why not? \_\_\_\_\_.

Does this project address environmental justice concerns regarding low-income and minority populations?  
 Yes If yes, how? \_\_\_\_\_.  
 No If not, why not? \_\_\_\_\_.

Additionally, Livable Memphis has developed some suggestions for the next update to the LRTP in four years, as well as for MPO processes in general:

- 1. PROCESS:** Start the LRTP review process earlier. Involve more stakeholders, and allow their input to influence the outcomes of the plan.
- 2. ASSUMPTIONS:** Change the assumptions, particularly regarding population growth, going into the modeling. A more realistic view of population growth and distribution in our region would initiate a meaningful conversation of how, *as a region*, we want to use our public infrastructure resources.
- 3. BEST PRACTICES:** Do a peer cities comparison. Other regions are making headway toward the goals and vision for a safe, accessible, multimodal network. For example, the Nashville Region’s LRTP focuses on multiple urban centers, fleshing out the existing network. Our urban center is nearly vacant of projects to be implemented. What are they doing to get it right? How can we improve the outcomes from Memphis MPO? Leslie Meehan, Director of Healthy Communities, for the Nashville MPO shared the image below:



Our region can become more attractive and safe for all stakeholders: cyclists, pedestrians, transit users, people with disabilities, as well as vehicle drivers and freight. Our transportation network can support real economic development for the region, rather than a zero-sum-gain. But *Direction 2040* won't get us there. Through adjustments to the TIP and in preparation for the next four years, the Memphis Area MPO could present a Long Range Transportation Plan that is truly transformative – creating a network that serves the multi-faceted community while building infrastructure to support a region that is staged to be thrive socially and economically.

Most sincerely,

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