To: Grace Gallucci
CC: NOACA Board of Directors

RE: NOACA's eNEO2050 Plan

I am writing to share concerns the undersigned organizations and individuals have with the NOACA eNEO2050 plan, NOACA's Long Range Transportation Plan.

The LRTP should be our vision for how transportation decisions we make build a more equitable system-- one that improves quality of life, creates equitable economic growth, and improves public health. This plan should embrace our values as a region for addressing climate change and historic and systemic inequalities.

There are notable positive aspects to the plan. The eNEO2050 Plan proposes 928 miles of new bike facilities and over 11,000 pedestrian ADA and safe crossings in the next three decades. It also includes key projects like connectivity along our lakefront and the Slavic Village Downtown Connector Trail. We also applaud NOACA for rejecting proposals to further expand sprawl and disinvestment in urban areas with additional highway interchanges in greenfield locations.

Our concerns with the eNEO2050 plan are outlined below:

1. The long-range plan's strategy for addressing congestion -- "Arterial Street Restoration" -- presents safety and quality of life concerns.

This term comes up many times throughout the plan. In chapter 3 the plan reads:

"VMT percent of the freeway network is more than three times that of the major arterial network. This disproportionate shares result in daily delay on the freeway network twice than that of the major arterial network. This is additional evidence for reinforcing the argument that the major arterial network as a mobility alternative to the freeway system is currently underutilized in the NOACA region." (Ch 3, pg 53).

It sounds like "Arterial Street Restoration" is a strategy to alleviate traffic congestion on the interstate highway network by reallocating space on arterial streets. This strategy would increase traffic on city streets, making them less safe for people biking and walking. Flooding walkable business districts and neighborhoods with pass-through traffic is not an equitable solution to addressing congestion on the freeway system. This strategy would make it more difficult to reallocate space on arterials for bike lanes or transit lanes, also known as a road diet. There is much more to consider when trading off "access" and "mobility" than the functional classification of a street, such as the street's context.

Moreover, is there adequate data analysis showing that there is unmanageable congestion on the freeway network, and that moving vehicles to the arterial network would be a successful solution? What about other solutions to congestion, like mode shift? Has such an analysis been presented to the public, and has public feedback demonstrated that this is a desirable solution? Are there specific arterials that have been identified? If so, what type of "restoration" is intended by the long range plan text on those corridors, and how does that match with existing plans for those arterials (road diet plans, transit plans, bike lane plans).

It is current practice for many cities to accept that a certain amount of congestion is part of an urban center, and seek to have predictable congestion, rather than to eliminate congestion. Travel Time Reliability is a measure used

to assess the consistency of travel times. This type of framework allows for a more balanced approach in urban areas that seek to balance the needs of transit, biking, walking, driving, and other road uses.

More recently, with COVID demonstrating the ability for many to work from home and/or have a more flexible commute time,, is “peak hour” congestion going to remain as important in the future as it has been in the past?

It’s important to note that this idea of Arterial Street Restoration is included in NOACA’s Draft Overall Work Plan, which is concerning.

2. **The long-range plan does not seek to reduce NE Ohio’s overreliance on driving -- the most expensive and most polluting form of transportation.**

In the eNEO2050 plan vehicle miles traveled is projected to increase by over 7.5%, which means more pollution, more wear and tear and less overall efficiency. Through the long-range plan we as a region need to prioritize projects that reduce driving miles to address the impacts driving has on climate change and our region's air quality.

Motor vehicles remain the largest source of ozone-producing chemicals. Although carbon dioxide emissions from vehicles did lessen in 2020, in part, due to telework during the pandemic lowering vehicle miles traveled, last year the region had 9 Ozone Alert Days (2 is the maximum allowed by law). The OEPA’s five-year review of ozone is due in 2021, and the region is expected to remain in “non-attainment” status for ozone, triggering additional pollution-control measures. Climate change will exacerbate conditions -- with hotter and drier summers expected to contribute to more ozone spikes. With tougher, Tier 3 (they require a 99% reduction of emissions per mile) vehicle emissions standards coming into enforcement, communities that are proactive in reducing air pollutants stand to benefit from a fiscal and a public health perspective. Communities near highways and factories have disproportionate impacts to air quality, making commuter vehicle miles traveled (VMT) at the regional level an environmental justice concern. As the agency overseeing regional transportation and air quality, NOACA has a responsibility to advance regional cooperation on clean air — by setting a goal to reduce ozone alert days to acceptable levels — within this update of its Long Range Transportation Plan.

3. **The long-range plan is not ambitious enough about promoting walking and biking as an alternative to driving, which we must do to address climate change.**

Section 11.6 on non-motorized transportation – This section focuses heavily on why people do not walk or use bicycles as transportation by noting:

“The low usage of walk and bicycle modes of transportation is due to many reasons such as: the concomitant increasing usage of motorized vehicles for transportation; the relatively low cost of operating motorized automobiles; the sprawling land use patterns; the adverse climatic conditions in the northeast Ohio.” (Ch. 11, pg 47)

In reading this statement I had to look up the word concomitant and found this exact statement in a University of Texas Austin published paper and want to note that it is taken out of context. The University of Texas paper goes on to say that it is crucial for the MPOs in regions with heavy congestion to achieve healthy air standards by reducing vehicular emissions by encouraging more non-motorized travel to reduce vehicular trips.

Aside from sprawl and winter climate, the remaining reasons mentioned in the eNEO2050 plan for low bike usage is that people don’t bike for transportation because people are naturally drawn to drive. This is incorrect, and is

counter to the investments NOACA has historically been making in multimodal transportation. Studies and experience in other regions have shown that if the built environment is safe and accommodating for people to bike, they will utilize it year round (look at the modal split in Minneapolis). Referring to point 1 above, arterial street restoration, this will make our region's main thoroughfares more congested, provide less space for accommodating bike facilities, and in the end encourage more people to continue to drive. We need NOACA to commit to a mode shift goal away from cars and toward biking/walking/transit and commit to funding projects that will meet that goal.

In addition, this section discounts, or doesn't even mention, the impacts that building a safe, connected bike network has on improving air quality, public health, and providing cheap, affordable, equitable transportation options. Instead it highlights a desire to connect active transportation users to transit. Overall, this plan reads as if the primary, and possibly only, transportation value of biking and walking is to access transit. Accessing transit is only one of many short trip types that biking and walking are ideally suited for, and the eNEO2050 plan doesn't acknowledge or plan for that.

Lastly, in the revenue calculations in Chapter 10 the non-motorized revenue (funding for biking/walking projects) is the same for both the "status quo" and the "equitable" scenarios, at $12,489,174. Building the proposed number of miles of bike facilities shown in the table 11-12 (Chapter 11) with the budget available seems like a major challenge, or even infeasible. When looking at an equitable scenario non-motorized transportation options should be prioritized over creating access to highways in the scenario's EJ areas.

4. The eNEO2050 plan doesn't adequately include NOACA's active transportation planning programs such as TLCI and ACTIVATE:

NOACA very recently spent a significant effort on updating it's bike plan and adding a pedestrian planning component. Updates on this plan were provided to BPAC and other committees, and the public and regional experts participated in the process via surveys, focus groups, etc. While the eNEO2050 plan does include some proposed bike/ped improvements, it isn't clear how those improvements were developed, and how they are connected to the ACTIVATE planning process and the public and expert feedback that was received. The bike inventory section in Chapter 3 uses incorrect terminology (e.g., segregated bike lane, shared bike lane) and is missing many types of bike infrastructure (e.g., sharrows, bike boulevards, bike routes); in addition, there seems to be errors in the table. The section on traffic control devices should include information from ACTIVATE on pedestrian signals and bicycle signals. The non-motorized transportation section in Chapter 3 has a significant amount of text copied from the last long range plan, AIM Forward 2040; this doesn't represent the recent planning done by NOACA.

The TLCI program is only briefly mentioned with an incorrect title in Chapter 9 ("transportation from livable community initiatives"); this planning program is heavily relied on as a crucial tool for active transportation planning in northeast Ohio, and should be a prominent component of active transportation planning in the long range plan.

5. The long range plan isn't clear on Vision Zero.

Vision Zero is mentioned in various places throughout the long range plan report (including being stated as a NOACA goal in Chapter 11), but also includes a 2% reduction in fatal crashes based on a 5 year rolling average, with a performance measure being 75 fatal crashes by the year 2050. This would add up to over 3,000 fatalities on our

roadways between now and 2050. As such, it is unclear what NOACA's stance on Vision Zero is, and how they are incorporating the Vision Zero goals of cities within the NOACA region.

As Bike Cleveland noted in our memo to the Safety and Operations Council in November of 2020 this is an unacceptable performance measure. We, as a region, need to adopt targets that inspire decision makers to enact policy and design changes to eliminate serious injury and fatal crashes. We need to be assertive in addressing the epidemic of roadway injuries and fatalities across our region. A 2% reduction based off a 5 year rolling average (that continues to increase) is counter-productive to saving lives on our roadways. The Center for Disease Control and prevention estimates that in 2018, traffic fatalities cost Ohio $1.69 billion in lost workforce and medical costs. But that isn't the most important cost. Each traffic fatality that we do not work towards ending is a lost mother, father, brother, son, or neighbor. These losses are preventable, we need the political will and bold action to address them. We understand there is a federal requirement for state DOT's to use a 5 year rolling average, but MPO's have the ability to set their own performance measures. Local decision-makers and the public look to NOACA for leadership in transportation planning, and we believe we as a region need to be visionary in setting our goals with an aim to eliminate traffic fatalities.

6. Despite the rhetorical emphasis on equity, there are no remedies proposed.

Historically transportation decisions have undeniably divided and adversely impacted black and brown communities. This plan focuses heavily on the advancement of autonomous vehicles and the hyperloop, which are technologies that will likely not be accessible to low-income communities. It focuses heavily on reducing highway congestion by bringing more traffic to arterial roads which will exacerbate issues around equitable transportation, such as localized air quality problems and additional injuries to vulnerable users. In chapter 3, there is an equation to calculate EJ access to freeway interchanges. What is the meaning of this? Many EJ areas have the highest % of households with no access to vehicles; therefore, it may be inappropriate for freeway access to be a measurement of success for an EJ area. Certainly there are more pressing transportation issues in EJ areas, and those should be the focus rather than access to freeway interchanges. Moreover, the freeway network has historically had a negative impact on EJ areas.

7. The long-term plan does not advance a serious transit expansion plan or agenda

In the eNEO2050 plan highway spending is greater than transit funding (transit only grows by $400million, while highway/roadway funding increases by about $3billion). The rough outline of a long-term transit vision is not well developed. Though NOACA does say it intends to spend $5 million on a transit plan, we are disappointed this was not further developed. MORPC in Columbus has developed a long-term plan that would concentrate job and residential development along key corridors, which would be serviced by frequent buses -- a much more cost effective proposal than the rudimentary vision presented by NOACA to extend rail service to outlying counties. That agency is working across municipalities to lay the groundwork with zoning changes to realize that vision for better sustainability and affordability. In addition, the transportation-focused chapters don't reference any recent transit planning efforts by NOACA, GCRTA, or others, including the NOACA TOD Plan, and the NOACA Regional Transit Plan. How is this work being incorporated into eNEO2050? Which plan do the transit priority corridors shown in Chapter 11 come from?

These are our concerns and we encourage NOACA to reconsider these elements of the plan. We think the region could do better. It's not time to shrink from challenges but to be bold around building a safer and cleaner and more just NE Ohio.

Sincerely,

Jacob VanSickle, Executive Director
Bike Cleveland