

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 615-921-9470

2 VICTORY AVENUE SOUTH, SUITE 500
NASHVILLE, TN 37213

Facsimile 615-921-8011

February 16, 2016

VIA ELECTRONIC MAIL KMayor@cityofportlandtn.gov

Honorable Kenneth Wilber, Chairman
Executive Board
Nashville Area Metropolitan Planning Organization
800 Second Avenue South
P.O. Box 196300
Nashville, TN 37201

Re: Nashville Area MPO Draft 2040 Regional Transportation Plan

Dear Chairman Wilber and Members of the Executive Board,

Thank you for the opportunity to comment on the Nashville Area Metropolitan Planning Organization (“MPO”) Draft 2040 Regional Transportation Plan (“the Draft Plan”). The Southern Environmental Law Center (“SELC”) works throughout Tennessee to promote a cleaner, more sustainable transportation system that protects and enhances our natural resources, communities, and quality of life. Because our Tennessee office is located in Nashville, and given the prominence of the Nashville region, we take a particular interest in transportation planning and projects in this region.

The MPO should be commended for its thoughtful and comprehensive approach to this process. The Draft Plan contains a wealth of information, identifies many of the challenges facing Nashville, Davidson County, and the surrounding Middle Tennessee counties over the coming decades, and attempts to offer strategies for addressing those challenges. SELC submits the following general comments and a number of specific comments to improve the Draft Plan and assist the MPO in its ongoing efforts to help Middle Tennessee grow in a more sustainable fashion.

The Draft Plan recognizes that Tennessee, and the Nashville Area MPO region in particular, will experience considerable changes over the next twenty-four years. The State is expected to experience dramatic population growth, and Nashville will continue to be the major driver of this growth as the region’s 2040 population is expected to reach over three million people.¹ Further, demographics are changing as the State and regional population continues to age and diversify, resulting in a significant shift in transportation needs and preferences. For example, millennials and Baby Boomers are pushing the preference for smaller living quarters in

¹2040 Plan at p. 3-3

walkable communities with access to transit and employers are adapting to these preferences by re-locating to regional centers and encouraging transit-oriented developments.²

The Draft Plan does an admirable job of responding to these shifting demographics and identifying many of the Nashville area's transportation policy challenges and opportunities over the next quarter century. We support the four goals and objectives the MPO identifies to help address these challenges:³ (1) prioritizing investments on our pressing safety and infrastructure needs;⁴ (2) focusing on logistics needs (3) increasing transportation access for all of the region's citizens;⁵ and (4) encouraging sustainability and the integration of transportation and land use planning.⁶ These will serve as important goals and benchmarks to foster livable and economically competitive communities in the 21st Century. Below we detail how each of these goals could be further strengthened to meet the evolving transportation needs of the MPO region.

I. Achieving the Goals Set Forth in the Draft Plan Will Require Alignment of State and Local Expenditures With the Draft Plan's Policy Framework

The Tennessee Department of Transportation's most recent 25-Year Long-Range Plan has not yet been finalized,⁷ but given TDOT's large role in programing state and federal funds, it is imperative that TDOT's transportation investments align with and support the goals of the Draft Plan. It is important that TDOT and the MPO work to achieve the same policy goals. Given the intricacies of transportation planning and transportation funding, TDOT's and the MPO's planning efforts and transportation investments must serve to reinforce, rather than undermine, each other. For example, the MPO's move at the local level to provide transit and multi-modal choices within its jurisdictional reach is potentially undercut by state funding all too often directed at roadway capacity expansion, which positions Tennessee at a disadvantage when compared to our neighboring states and competitor markets; likewise, the State Route 109 Corridor Management Committee's work may be undercut by both state regulations that are inconsistent with the best practices identified and TDOT's continued funding of projects that do

² 2040 Plan at pp. 2-1, 2-3. See also University of Tennessee, "Study: Tennessee on Track for Steady Population Growth" (Aug. 27, 2015) available at <http://tntoday.utk.edu/2015/08/27/study-tennessee-track-steady-population-growth/> (last visited Feb. 12, 2016).

³ 2040 Plan at pp. 6-1 to 6-3.

⁴ 2040 Plan at p. 6-1 (Goal 1. Maintain a Safe and Reliable Transportation System for People and Good).

⁵ 2040 Plan at p. 6-1 (Goal 2. Help Local Communities Grow in a Healthy and Sustainable Way) ("Pursue solutions that promote social equity and contain costs for transportation and housing.").

⁶ 2040 Plan at *id.* ("Align transportation decisions with economic development initiatives, land use planning, and open space conservation efforts. Integrate healthy community design strategies and promote active transportation to improve the public health outcomes of the built environment.").

⁷ "TDOT's 25-Year Long-Range Transportation Plan," available at <https://www.tn.gov/tdot/topic/transportation-plan> (last visited Feb. 12, 2016); see also Toks Omishakin, *TDOT Plans for the Future of Tennessee Transportation*, THE TENNESSEAN (May 4, 2015), available at <http://www.tennessean.com/story/opinion/contributors/2015/05/04/planning-key-tennessee-future/26893219/>.

not take the Access Management Study's best practices into consideration. The same is true for the MPO's coordination with local plans, such as NashvilleNext and the Nashville MTA/RTA nMotion strategic plan.⁸ Unless planning and investment decisions throughout the metro Nashville region are in alignment, the lack of coordination and friction between the various efforts will present a significant barrier to achieving the goals set forth in the Draft Plan.

II. Flexible Transportation Funds Must Be Prioritized For Non-Roadway Purposes

The need for transportation options, multimodal connectivity, and alternatives to single occupancy vehicle ("SOV") transportation are consistent themes throughout the Draft Plan. In addition to the needs the Draft Plan recognizes, in October 2015, the U.S. Environmental Protection Agency announced that it tightened the ozone pollution standard from 75 to 70 parts per billion ("ppb"). Based on 2012-2014 monitoring data, portions of the MPO's area are at risk of being in non-attainment for the new ozone standard.⁹ For years, in fact, the Nashville region has under-invested in these types of projects and the problem is compounded by the fact that the majority of available transportation funds have been dedicated to roadway projects. Therefore, it is imperative that the MPO and its partners are strategic in their use of flexible funds that can be used for bicycle, pedestrian, and other non-automobile transportation projects.

For example, the federal Congestion Mitigation Air Quality ("CMAQ")¹⁰ and Surface Transportation Program ("STP") funds are not only eligible for use on non-roadway projects, but using them for this purpose squarely aligns with Congress' intent in creating these programs. The new federal transportation legislation—the Fixing America's Surface Transportation Act (the "FAST Act")—merged TAP with STP as the "Surface Transportation Block Grant Set-aside Program." Given the region's immense need for non-motorized transportation infrastructure and the limited funding options available, it is imperative that the MPO and its partners continue to use all of the Surface Transportation Block Grant Set-aside Program funds for bicycle, pedestrian, and other non-roadway transportation infrastructure.

Given the region's massive need for investment in non-roadway infrastructure and the limited options available for funding such projects, it is imperative that the MPO and its partners take full advantage of the funds that can be used for these purposes. If the Draft Plan is not amended to take this into consideration, we believe additional funds should be programmed for transit and other modes.

III. The Draft Plan Should Condition Funding on Enacting Complete Street and Access Management Policies

⁸ <http://www.nashville.gov/Government/NashvilleNext.aspx>; <http://nmotion2015.com/> (last visited Feb. 12, 2016).

⁹ For example, EPA's interactive map that shows Sumner County. <http://www3.epa.gov/airquality/ozonepollution/maps.html>

¹⁰ *2040 Plan* at p. 8-9 (\$269 Million in CMAQ funds anticipated for 2016-2040).

Encouraging the adoption of local “complete streets” polices and design guidelines is a key means to achieving the Draft Plan’s vision.¹¹ We agree with this tactic, because the concept of complete streets is an important tool for making each of our communities accessible to all users, both improving quality of life and encouraging smart development. Although the Draft Plan discusses the benefits of complete streets policies, it does not require complete street policies or appear to factor them into the project selection framework. We suggest that the MPO follow the lead of other MPOs from across the country that have made complete streets policies mandatory and have incorporated them into their project prioritization framework. The Columbus Ohio MPO, for instance, adopted a regional complete streets policy that seeks to incorporate complete street policies into all transportation projects in the region and conditions MPO-controlled federal funding on projects adopting complete street policies.¹²

Similarly, the Draft Plan rightly points to the importance of access management.¹³ When access to a common roadway is not limited and driveways proliferate along a route, safety is compromised, the level of service is lowered, and the perceived need for additional roadways grows disproportionate to true need. The MPO should condition funding new roads and expansion projects on their compliance with the best practices for access management principles, such as those being advanced on State Route 109.¹⁴ We have been observing the progress of the SR-109 Access Management Study (“Study”) facilitated by the MPO, which is nearing completion. The Study’s preliminary findings suggest best practices, safety elements, and design criteria along a sliding scale of access. Using a variety of access categories recognizes that different roads and/or segments serve different purposes or have already been developed to a point where they cannot be re-designated. Unfortunately, it is not clear that the Study’s findings are being implemented. We submitted comments describing this conflict in our comments on the Draft Environmental Assessment prepared by TDOT for the Portland Bypass, and we would be happy to provide a copy for your review as well.

¹¹ 2040 Plan at p. 6-12, 6-13; 7-12.

¹² Mid-Ohio Regional Planning Commission Complete Streets Policy, available at <http://morpc.org/transportation/complete-streets/index>; see also

<http://www.smartgrowthamerica.org/documents/cs/policy/cs-oh-morpc-policy.pdf> (last visited Feb. 12, 2016) (“MORPC requires that all projects receiving MORPC-attributable federal funding adhere to this policy. MORPC members receiving MORPC-attributable federal funding shall fill out the checklist accompanying this policy. More information on the review and appeals process is available in the Applicability section. Projects utilizing any other funding sources are also encouraged to adhere to this policy.”).

¹³ 2040 Plan at pp. 7-15 to 7-18.

¹⁴ 2040 Plan at p. 2-8.

IV. The Draft Plan's Project Prioritization Framework is an Important Step Forward for Regional Planning in Middle Tennessee.

One of the most important elements of the Draft Plan is the project prioritization framework. We applaud the MPO for their work in developing a more objective, data-driven approach for evaluating and prioritizing projects.¹⁵

Since the methodology underlying the framework has a significant impact on determining the outcomes, the true costs and benefits of each project must be correctly assessed to ensure that the projects which are advanced further the goals and needs of the region. Below are several examples of how the proposed project prioritization framework ties project assessment to important overarching policy goals and areas where the framework can be improved.

A. Costs of Air Pollution.

A critical component of the project prioritization framework is the accounting for externalities in project evaluation by including criteria air quality impacts in the cost-benefit analysis used for roadway expansion projects. (Appendix E at p. 3). Assigning a cost to air pollution not only helps the Nashville region achieve the overarching goal of complying with current and future air quality standards, but it also recognizes that improved air quality offers the benefits of improved quality of life, health, and economic competitiveness.¹⁶ However, we recommend that air pollution benefits or constraints receive a separate scoring metric rather than being included in the general "Environment & Health" category along with land use or assigned more than 2 points by which a project's 15 possible points is reduced.¹⁷ We also suggest including an air pollution metric within your "Freight & Goods Movement" category in order to capture the benefits of projects that improve rail and barge freight movement when compared to trucks.

B. Quality Growth and Preservation.

Another important component of the framework are the "quality growth" and "preservation" criteria used to measure the extent to which a project integrates with smart land use planning and minimizes the potential for sprawling growth. (Appendix E). These criteria emphasize the importance of improving regional mobility and reducing congestion, while also

¹⁵ 2040 Plan at p. 8-7 (citing nine factors more fully described in Appendix E); (Appendix E at pp. 43-47).

¹⁶ Appendix H at p. 1 ("As of April 15, 2009, the counties of the Nashville Area MPO are considered in compliance with National Ambient Air Quality Standards and no longer are required to demonstrate conformity with established motor vehicle emissions budgets. The region does remain part of the Tennessee's State Implementation Plan, and as such, continues to be eligible to receive Congestion Mitigation Air Quality funding from the Federal Highway Administration, at the discretion of the Tennessee Department of Transportation.").

¹⁷ 2040 Plan Project Scoring Methodology at p. 3 ("Environment/Health (max 15) = [(proposed # elements ÷ possible # elements) x 10 pts] + degree of environmental conflict (up to 10 pts) + active transport in health priority area (3 pts) + multi-modal for vulnerable populations (up to 8 pts) + emissions impact (-2 pts)").

prioritizing projects within important regional corridors in accordance with the Draft Plan's land use goals. We agree that it is important to separately evaluate preservation (10 points) and quality growth (15 points), because together they add up to significant contributors to a healthy network and community.

C. Multi-Modal.

The multi-modal criterion provides a clear, objective basis for helping determine what mix of investment in different modes would best achieve the regional goals. (Appendix E). As described above, the question of whether STP funds should be used for the best road project or the best transit project is itself a significant question. To better align the Draft Plan with regional needs and goals, we suggest that the MPO develop an optimal mix of projects between modes based on this criterion and then seek to match funds to the optimal mix of projects as permitted by their various restrictions.

D. Congestion Management.

It is important to evaluate road widening projects and managed lane projects separately, even though they both add road capacity. (Appendix E) ("Proposed improvements focused on motorized and non-motorized capacity and efficiencies"). The Project Scoring Methodology does not expressly consider the question of whether the Draft Plan's goals may be best served by adding managed capacity versus unmanaged capacity. Decisions regarding road construction can have a host of fiscal, congestion, environmental, health, and community impacts, and these decisions should be made in an objective, data-driven manner. The MPO, we recognize, is well-aware that traffic congestion cannot be solved by simply building more roads, given that only 45% of congestion is attributable to causes that can be improved by additional roadway lanes and other transportation improvements.¹⁸ Unfortunately, the list of cost-feasible projects includes many new roadways,¹⁹ which raises significant concerns. We have not undertaken a project-by-project analysis of these projects but question the Draft Plan's emphasis on new roadway projects. When additional information is available and the appropriate environmental assessment conducted, we will offer more specific feedback. However, we can offer our support for including significant funding for roadway reconstruction and multi-modal upgrades (\$1 Billion),²⁰ and we ask the MPO to consider whether the new road projects could be further reduced by considering road widening projects separately during the prioritization process.

E. Potential for Transit Oriented Development.

Although the land use model documentation recognizes the importance of transit oriented developments ("TODs") in planning decisions,²¹ the multi-modal project evaluation

¹⁸ 2040 Plan at 5-8.

¹⁹ 2040 Plan at 8-8. We note that the chart says "\$3.2 Million" rather than "Billion."

²⁰ 2040 Plan at 8-8.

²¹ See Appendix F. See also 2040 Plan at 6-8 (noting potential for TODs along major transportation corridors).

methodology measures projects across several criteria but does not include any consideration of potential transit oriented development. (Appendix E). This omission is important because it significantly undervalues rail-based transit projects. Experience in other regions, such as Charlotte, Dallas, and Phoenix, has demonstrated that rail investments have substantial potential to generate new development and shape land use patterns. In turn, these land use changes increase tax revenues and create the potential for value capture funding strategies. Bus systems, which can be easily rerouted or eliminated, typically have less potential for spurring economic activity and land use changes, but they can also encourage development—the same is not true for bus rapid transit systems designed to include permanent stops, dedicated lanes, and other infrastructure amenities that reassure developers as to their longevity. Given these benefits of transit projects, we recommend that the MPO include transit oriented development potential in the economic growth criterion for all transit projects.

F. Accessibility.

Both in its implementation of the Draft Plan and moving forward, the MPO must focus on mode-neutral transportation performance metrics—like accessibility—in its evaluation of transportation plans and individual projects. Historically, transportation engineers and planners have evaluated the performance of transportation projects and plans using metrics designed to evaluate the performance of roads. These measures, such as level of service, travel time index, and even congestion itself, are narrowly focused on the engineering performance of a road and fail to address the larger purposes of a transportation network.

When we leave our house, our purpose is not to engage in the trip itself but to reach our destination. Road-centric metrics miss this larger purpose, focusing on how road conditions compare to some engineering standard rather than assessing how easy it is to accomplish the actual purpose of travel, which is to reach our destination. This redefinition of the purpose of transportation comes at a cost, as trips taken by transit, biking or walking tend to either perform poorly or cannot be calculated at all under these road-based metrics. Further, these road-based metrics generally ignore key variables, like the distance of the trip, that play a prominent role in how easily we can access a given destination.

The Draft Plan implicitly acknowledges this issue and includes a variety of statements underscoring the need to focus on accessibility.²² Therefore, mode-neutral metrics should be given priority as the preferred approach for assessing transportation performance in the Draft Plan and going forward. Many of these metrics—accessibility, job catchment areas, and trip reliability—are already considered to some degree in the Draft Plan. However, they must be given greater weight if the region is to shift its transportation focus toward the more multi-modal, cost-effective, and efficient vision set forth in the 2040 Plan.

Accessibility is also an important consideration to advance transportation equity. The Draft Plan currently considers whether a project is located in an equitable target area.²³ But

²² 2040 Plan at p. 4-10; 5-2; 6-2; 7-14.

²³ Appendix E (“Project provides multi-modal options to areas with high degree of disadvantaged populations.”).

whether a project actually benefits the residents of that area is not merely an issue of location, but a more nuanced question that road performance metrics fail to adequately address. If the purpose of a project in an equitable target area is to allow drivers from outside that area to traverse it more quickly, the project may score well under road performance metrics while failing to do anything to benefit—and perhaps even harming—the area residents. But if the project is evaluated instead using accessibility and mobility metrics, then it would be clear whether a project located in an equitable target area actually benefits area residents by improving their mobility and accessibility.

V. The MPO is a Leader on the Issue of Climate Change and the Draft Plan Should Include a Long-Term Approach to Its Air Quality Analysis

We were proud to serve as a member of the stakeholder/advisor group established as part of the MPO's Climate Solutions University curriculum. The MPO has shown a great deal of leadership, both among governments and among MPOs, in its consideration of greenhouse gas emissions. The Draft Plan underscores the importance of this issue and the need for the MPO to address it through the regional plan:

Climate variability and change is one of the most serious threats to our infrastructure, and adaptation strategies must be pursued to ensure the reliability, functionality, and safety of the region's transportation network.²⁴

The MPO's efforts to address climate change to date have focused primarily on research and data analysis, and we strongly support the Draft Plan's embedded strategies for reducing transportation-related GHG emissions by identifying significant transit projects that are worthy of investment. As the Draft Plan notes, many of the strategies for reducing transportation-related GHG emissions align closely with other goals adopted by the Draft Plan. Others, such as fuel economy, are not within the MPO's control. However, there are at least two areas where the MPO can continue to lead on this issue. First, the MPO could adopt policies specifically directed at reducing per capita VMT in the region. Second, the MPO could adopt an aspirational GHG emissions target. As the Federal Highway Administration has explained:

Setting targets based on policy priorities or to signal an issue's importance to the community, often prior to conducting a detailed analysis to determine actual feasibility. . . . The following States have established specific statewide GHG emissions targets: Arizona, California, Colorado, Connecticut, Florida, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, New Hampshire, New Jersey, New Mexico, New York, Oregon, Rhode Island, Vermont, and Washington. Although many of these aspirational targets address total GHG emissions from all sources (transportation and otherwise), setting an aspirational target can signal the importance of climate change to policy-makers

²⁴ *2040 Plan* at p. 7-28. *See also 2040 Plan* at p. 6-3; 9-12. To the extent is not already part of the CSU's report, given the number of recent severe rainfall events, one issue that is particularly ripe for review would be an evaluation of the region's stormwater and transportation infrastructure to identify areas which are particularly vulnerable to flooding during severe rainfall events.

at the State, regional, or local levels, as well as relevant interest and advocacy groups and the public, all of whom may later have some involvement in project and investment prioritization. Setting aspirational targets may also emphasize the importance of multiple factors - transportation investments, land use, vehicle technologies, fuels, transportation operations, etc. - in reaching targets, since it may be impossible for transportation investment strategies alone to reach the target.

Target zero initiatives focused on eliminating roadway fatalities have brought together a wide range of stakeholders involved in traffic safety, including transportation agencies, law enforcement, and public health, to address the causes of crashes. Similarly, an aspirational target for reducing GHG emissions may help to encourage greater partnership among transportation planning agencies, operating agencies, environmental agencies, and policy-makers to consider the wide range of strategies needed. For instance, the Denver Regional Council of Governments (DRCOG)'s board has set a per capita GHG reduction target of 60% below 2005 levels by 2035 from the transportation sector, as well as reduction in "drive alone" commutes and per capita VMT. The GHG reduction target was based on the State GHG reduction targets, but not on a systematic analysis of what was feasible.²⁵

VI. The Individual Projects in the Draft Plan Must Be Reviewed Further Through the National Environmental Policy Act

There have been various attempts in recent years at the national level to streamline the project delivery process and to better align project review under the National Environmental Policy Act ("NEPA") with project decisions made by MPOs and local governments through local transportation and land use plans.²⁶ Better aligning these processes and providing more efficient project evaluations are worthwhile goals. However, given the dramatic influence transportation projects can have on our communities, our health, and our natural resources, projects must be fully evaluated and understood before they are built. Given the limited information available for the projects in the MPO's 2040 Regional Transportation Plan and Transportation Improvement Program project lists, any project with the potential for significant environmental impact must be thoroughly evaluated through the NEPA process before it is undertaken.

²⁵ "A Performance-Based Approach to Addressing Greenhouse Gas Emissions through Transportation Planning," FHWA, *available at* https://www.fhwa.dot.gov/environment/climate_change/mitigation/publications_and_tools/ghg_planning/page06.cfm (last visited Feb. 16, 2016).

²⁶ Notably, section 102(2)(E) of NEPA, 42 U.S.C. §4332(2)(E), requires an agency to consider alternatives to the proposed action. Courts have interpreted this provision to require full and meaningful consideration of all reasonable alternatives, regardless of whether an EIS or an EA is being prepared. *See, e.g., Envtl. Prot. Info. Ctr. v. United States Forest Serv.*, 234 Fed. Appx. 440, 442-43 (9th Cir. 2007); *Bob Marshall Alliance v. Hodel*, 852 F.2d 1223, 1228-29 (9th Cir. 1988).

More particularly, as noted in the MPO's Fiscal Year 2015 Unified Planning Work Program and other long-range planning documents,²⁷ environmental review required by the National Environmental Policy Act ("NEPA") should be integrated into the planning process.

For example, whether or not each MPO project involves federal funds and regardless of the technical boundaries of NEPA applicability, the Draft Plan should more explicitly discuss the need to ensure that planning and environmental reviews for transportation and other major infrastructure improvements include a careful review of GHG emissions and adaptation-related factors, especially in their review of alternatives. For example, it might be worth referencing the President's Council on Environmental Quality, which has issued draft guidance on the consideration of climate change in NEPA reviews.²⁸ It notes that "Government action occurs incrementally, program-by-program and step-by-step, and climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions" ²⁹ As the Draft Plan notes, land use planning in Middle Tennessee cannot continue to view impacts at the parcel level; an analysis of alternatives should not assume limitless growth, whether or not the project is built, or fail to aggregate the impacts of discrete projects on the region's air quality.³⁰

VII. Conclusion

Thank you for the opportunity to submit these comments and for the MPO's hard work in preparing the Plan. It provides a wealth of information and represents a clear step forward toward a more livable, sustainable, successful Middle Tennessee, and we look forward to working with you to improve and implement the Plan and to strengthen our region's transportation system.

²⁷"In recent years, federal and state agencies have sought to streamline the transportation project delivery process by linking the planning process with the environmental review required by the National Environmental Policy Act ("NEPA"). To assist in this effort, the MPO has placed an emphasis on integrating analyses of environmental, community, and economic goals into long-range planning. The UPWP includes significant resources to ensure that the project evaluation and prioritization processes used in the development of the Regional Transportation Plan includes documentation that is useful as projects move toward implementation. Included in MPO efforts to link planning activities with subsequent environmental assessment activities is a comprehensive analysis of the proposed 2040 RTP through environmental justice screenings to ensure projects do not cause disproportionate harm to traditionally underserved communities." http://www.nashvillempo.org/docs/upwp/FY2015UPWP_Adopted_20AUG14.pdf See also http://www.nashvillempo.org/docs/lrtp/2035rtp/Docs/2035_Doc/2035_Chapter9.pdf ("The National Environmental Policy Act of 1969 (NEPA) established a national policy to promote the protection of the environment in the actions and programs of federal agencies. The FHWA and FTA act as lead Federal agencies, and are responsible for implementing the NEPA process and working with state and local project sponsors during transportation project development. The FHWA and FTA NEPA process is designed to assist transportation officials in making project decisions that balance engineering and transportation needs with the consideration of social, economic and environmental factors.").

²⁸ https://www.whitehouse.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance_searchable.pdf

²⁹ *Id.*

³⁰ For example, the MPO's efforts to coordinate multi-jurisdictional corridor/access management agreements—in order to limit sprawling development—cannot be allowed to be undermined by parcel-level political decisions.

Sincerely,



Delta Anne Davis
Managing Attorney



Anne E. Passino
Staff Attorney

cc: Mr. John Schroer, Commissioner
Tennessee Department of Transportation (via email)

Michael Skipper, Executive Director
Nashville Area Metropolitan Planning Organization (via email)

comments@nashvillempo.org