



MEMORANDUM

TO: Transportation Planning Board
FROM: Lyn Erickson, Plan Development and Coordination Program Director
SUBJECT: Public Comment for the February 2023 TPB Meeting
DATE: February 15, 2023

The Transportation Planning Board accepts public comment on a rolling basis. Comments can be submitted via email (tpbcomment@mwkog.org), online (mwkog.org/tpbcomment), and phone. Comments are collected until noon on the Tuesday before the TPB meeting. These comments are compiled and shared with the board at the meeting the following day.

Between the January 2023 TPB meeting and noon on Tuesday, February 14, 2023, the TPB received two comments submitted via email, and one included a letter.

The comments are summarized below. All full comments are attached to this memo.

PUBLIC COMMENT

Tad Aburn –Email – February 14, 2023

Aburn, a former Maryland Department of the Environment representative on MWACQ, provided written comment asking TPB to work through MWCOG on transportation issues impacted by climate change including emissions goals and air quality conformity. The written comment is attached.

Stewart Schwartz, Coalition for Smarter Growth and 38 signatories – Letter via E-mail – February 14, 2023

Schwartz, Executive Director for the Coalition for Smarter Growth, in addition to 38 signatories, provided a letter detailing concerns and recommendations for the TPB to consider about the Visualize 2050 plan update process. The attached letter comments on the Technical Inputs Solicitation process, the staff January Frequently Asked Questions document, the Zero Based Budgeting process, and asks TPB members to conduct public meetings.

Marcela Moreno

From: George Aburn <tadaburn@gmail.com>
Sent: Tuesday, February 14, 2023 8:12 AM
To: TPBcomment; Lyn Erickson
Cc: Jeffrey King; Kanti Srikanth
Subject: Item 1 Virtual Comment Opportunity
Attachments: TPB 021523 Final Written Comment .pdf

Lyn, please register me to provide the written comments allowed for during the 2/15/23 TPB meeting.

The short written comment is attached.

Thank you again for your help with this process.

Tad

tadaburn@gmail.com

(443) 829-3652

Comments for the February 15, 2023 TPB Meeting

Tad Aburn

tadaburn@gmail.com

(443) 829-3652

Mr. Chairman, Board members, thank you for providing the opportunity to provide public comment today.

My comments today, focus on two key issues ... the key roles transportation has in addressing environmental justice and climate change.

At your November meeting, my comments focused on a specific project, the District of Columbia's Claybrick Road Project in PG County - a poster child for government supported environmental racism. My comments on January 18th highlighted how regional transportation, air quality and land use policies are now driving unintentional racial inequity. Today I am urging TPB to work through MWCOG to update two critical transportation issues driven by climate change.

For the issues raised in November and January, have TPB or its members begun to address those issues? It would be very helpful if TPB could provide an update.

The two climate change issues are:

1. The work TPB is now doing to meet current MWCOG climate change goals (50% by 2030) may be wasteful as the region needs to update its goals to be consistent with the science and other leadership organizations. Goals in the 60% reduction by 2030 ... and net-zero emissions by 2045 range ... are more consistent with the science and other leadership areas. This is particularly important to transportation planning as the strategies to meet weaker goals may not be the same as strategies needed for tougher goals.
2. TPB needs to include CO2 as part of the transportation conformity process required under the Clean Air Act to ensure that updates to TIPs and CLRPs are consistent with the region's climate change goals ... before those plans are adopted.

Additional information is provided in my letter to TPB dated 2/15/2023 provided to COG staff and available in your Board packet. This letter attaches a letter to ACPAC, the region's climate change public advisory committee. The issue will also be raised to

CEEPC. Unfortunately, these committees do not routinely provide the opportunity for public comment at their meetings.

In closing, transportation planning, racial equity and climate change are three of the most important issues that TPB and MWCOG must address. I urge you to show real leadership and aggressively pursue solutions to these critical issues.

Marcela Moreno

From: Stewart Schwartz <stewart@smartergrowth.net>
Sent: Tuesday, February 14, 2023 10:56 AM
To: TPBcomment
Cc: Bill Pugh
Subject: Visualize 2050: 39 Org Sign-On Letter for distribution to TPB
Attachments: Sign-on Letter - Final - to TPB re Visualize 2050 w 38 organizations Feb 2023 .pdf

Kanti and Lynn:

Please see the attached letter from 39 conservation, smart growth, housing, transportation, and climate organizations in the DC region (and including the Sierra Club National Office), sharing our concerns about the Visualize 2050 process.

Note that the letter includes an attachment after the signatures, with detailed recommendations.

Thank you,

Stewart and Bill

Stewart Schwartz | Executive Director
Bill Pugh | Senior Policy Fellow
Coalition for Smarter Growth
PO Box 73282
Washington, DC 20056
www.smartergrowth.net | @betterDCregion

Coalition for Smarter Growth | Piedmont Environmental Council | Virginia Interfaith Power and Light | Maryland League of Conservation Voters | Chesapeake Climate Action Network | Virginia Conservation Network | Washington Area Bicyclist Association | Northern Virginia Affordable Housing Alliance | Sierra Club – Maryland | Sierra Club – Virginia | Sierra Club – District of Columbia | Sierra Club – National | EcoAction Arlington | Fairfax Alliance for Better Bicycling | Faith Alliance for Climate Solutions | YIMBYs of Northern Virginia | Nature Forward | Virginia Bicycling Federation | Frederick, MD Citizens for Responsible Growth | Central Maryland Transportation Alliance | Bike Falls Church | Sustainable Mobility for Arlington County | Mobilize Frederick | Clean Fairfax | Bike Loudoun | Catoctin Coalition | BRUU Green Team | Center for Sustainable Communities | Grassroots Alexandria | Friends of Rural Roads (Frederick County, MD) | Lewinsville Faith in Action | Indivisible Howard County | Southern Environmental Law Center | Active Prince William | Deanwood Citizens Association | Adventure Cycling Association | MORE (Mid-Atlantic Off-Road Enthusiasts, Inc) | Northern Virginia Families for Safe Streets | Montgomery for All

February 14, 2023

TPB Chair, Hon. Reuben Collins
National Capital Region Transportation Planning Board
777 North Capitol Street NE, Suite 300
Washington, DC 20002-4239

Dear TPB Chair Collins and Board members,

The following comments are provided by 39 regional organizations¹ that are concerned with the direction the Visualize 2050 update is going.

- This Visualize 2050 process is the last opportunity to make meaningful policy and project changes in the long-range plan that can help the region attain urgent 2030 climate and equity commitments; and
- The TPB Board in 2021 likewise recognized this and took the extraordinary step to call for immediately starting over after the 2022 long-range plan was adopted, with the purpose of achieving a significant change from the status quo; however,
- The process proposed by TPB staff thus far provides little substantive change.

Thus, we respectfully ask the TPB to:

1. Restore to the Technical Inputs Solicitation the clear direction that the Board *requires* members to prioritize projects supporting key regional policy goals;
2. Clarify the Zero-Based Budgeting process descriptions and FAQs to better reflect this requirement and key findings of TPB's Climate Change Mitigation Study. For example,

¹ With eight additional individuals included from the participating signatory organizations.

staff FAQ #6 omits critical information regarding the connection between road expansion, induced demand, vehicle miles traveled and emissions;

3. Broaden the scope of projects subject to the Zero-Based Budgeting process to reflect the intention of TPB's Board. As proposed by staff, only 1 in 5 projects would be subject to review under the ZBB process, and even a number of projects not completed as far out as 2040 would be exempt; and
4. Commit as local jurisdictional members to conduct advertised public meetings to guide your localities' development of project submissions for Visualize 2050. We applaud the TPB's collection of comments received on its website during the project solicitation stage. But this process also needs proactive advertisement and public meetings directly with the local and state agencies and local elected bodies who will make critical project decisions between now and June.

Further details on these recommendations are included in the following pages.

Thank you for your consideration,

Stewart Schwartz, Executive Director
Bill Pugh, Senior Policy Fellow
Coalition for Smarter Growth

Christopher Miller
President
Piedmont Environmental Council

Faith B. Harris
Executive Director
Virginia Interfaith Power & Light

Kim Coble
Executive Director
Maryland League of Conservation Voters

Victoria Higgins
Virginia Director
Chesapeake Climate Action Network

Wyatt Gordon
Senior Policy Manager
Virginia Conservation Network

Jeremiah Lowery (Kevin O'Brien)
Advocacy Director
Washington Area Bicyclist Association

Jill Norcross
Executive Director
Northern Virginia Affordable Housing Alliance (NVAHA)

Josh Tulkin
Executive Director
Sierra Club – Maryland

Gustavo Angeles
Acting Executive Director
Sierra Club – Virginia

Matt Gravatt
Chair
Sierra Club – District of Columbia

Will Anderson, Deputy Legislative Director
Sierra Club – National

Joy McManus
Transportation and Smart Growth Issue Chair
Sierra Club

Elenor Hodges
Executive Director
EcoAction Arlington

Bruce Wright, President
Yvette White, Board Member
Fairfax Alliance for Better Bicycling

Andrea McGimsey, Executive Director
Scott Peterson, Vice Chair
Jo Doumbia, Board Member
Faith Alliance for Climate Solutions

Alex Goyette
Lead
YIMBYs of Northern Virginia

Eliza Cava
Director of Conservation
Nature Forward

Brantley Tyndall
President
Virginia Bicycling Federation

Kevin Sellner
Member
Frederick, MD Citizens for Responsible Growth

Brian O'Malley
President & CEO
Central Maryland Transportation Alliance

Andrew Olesen
Co-Founder
Bike Falls Church

Christopher Slatt
President
Sustainable Mobility for Arlington County

Karen Cannon
Executive Director
Mobilize Frederick

Jennifer Cole
Executive Director
Clean Fairfax

Lisa Campbell
Co-Chair
Bike Loudoun

Martha Polkey
Coordinator
Catocin Coalition

Dr. Larry Underwood
BRUU Green Team

Garry Harris
Managing Director
Center For Sustainable Communities

Jonathan Krall
Member, Steering Committee
Grassroots Alexandria

Susan Hanson
Spokesperson
Friends of Rural Roads, Frederick County, MD

John Clewett
Co-Lead
Lewinsville Faith in Action

Peter Alexander, PhD
Member, Climate Action Team
Indivisible Howard County

Trip Pollard
Senior Attorney
Southern Environmental Law Center
Mark Scheufler and Allen Muchnick
Co-Chairs
Active Prince William

Max Richman
Treasurer
Deanwood Citizens Association

Katie Harris
Director of Routes and Advocacy
Adventure Cycling Association

Ernest Rodriguez
President
MORE (Mid-Atlantic Off-Road Enthusiast, Inc)

Mike Doyle
Founding Member
Northern Virginia Families for Safe Streets

Brandi Panbach
Steering Committee
Montgomery for All

Pam Burke
Individual

Sam Butler
Media & Tech Professional
Individual

Attachment: Specific comments on the proposed Visualize 2050 Project Solicitation documents and Zero-based Budgeting Process:

1) Restore to the Technical Inputs Solicitation the clear direction that the Board *requires* members to prioritize projects supporting key regional policy goals

The proposed Technical Inputs Solicitation *weakens* rather than *strengthens* the expectation adopted by the TPB Board that projects support adopted regional policies. We ask TPB to restore the clear and direct policy language.

The TPB Board voted to include the following statement in the 2021 Visualize 2045 Technical Inputs Solicitation:

"TPB requires its member agencies to prioritize investments on projects, programs, and policies to reduce greenhouse gas emissions, prioritize the aspirational strategies, and achieve COG's land use and equity goals as they submit their inputs for inclusion in the TPB's LRTP and TIP."

– TPB Board Adopted Technical Inputs Solicitation, January 2021

The new staff draft removed this clear direction and replaced it with the following statements, replacing “requires to prioritize” with “enable to reflect” and “should review and consider”:

“...the intent [of the zero-based budgeting approach] is to enable the submissions to better reflect TPB planning priorities, to be more aligned with the TPB's policy framework, be more reflective of TPB scenario findings, and be more responsive to other findings from related TPB analysis. Documents that the TPB sponsoring agencies should review and consider prior to resubmitting their technical inputs are described and linked in this document.” p. 2

“The TPB Synthesized Policy Framework and the TPB Summary of Scenario Studies Findings will be considered part of the TPB's Technical Inputs Solicitation for the Visualize 2050. These documents are expected to be used by TPB member agencies to develop inputs for Visualize 2050. Additionally, the TPB produces other analysis and information that should also be considered...” p. 3,

– Proposed Draft Technical Inputs Solicitation, January 2023

Please retain the clear statement adopted by the TPB Board for the Jan. 2021 solicitation guide.

2) Clarify the Zero-Based Budgeting process descriptions and FAQs to better reflect this requirement and key findings of TPB’s Climate Change Mitigation Study. For example, staff FAQ #6 omits critical information regarding induced demand, vehicle miles traveled and emissions;

2A. The Zero-based budgeting approach needs to elaborate how project submissions will be reviewed by TPB and the minimum information standards that project sponsors must meet in responding to questions regarding their project consistency with regional policies.

With regard to demonstrating support for regional policies, we have not yet heard how the zero-based budgeting approach proposed by staff is substantively different from the Visualize 2045 process two years ago. In response to Technical Committee member agency questions on what the Solicitation document “should review and consider” statement means, TPB staff responded that while member agencies are being encouraged to review the policy summaries, in practice there is no requirement to answer the policy consistency questions differently, that member agencies could, if they so desired, copy and resubmit their policy consistency responses from two years ago.

CSG does not believe that this process is what the TPB board had in mind when it called for a special update to the long-range plan to make significant changes to help meet urgent policy needs in climate change, safety and equity.

We ask TPB at a minimum to make this simple clarifying change to the FAQ document #5:

*“The agency submitting the project for inclusion in Visualize 2050 ~~can~~ **must** use a variety of supporting studies, analysis, and/or technically reasonable assumptions in responding to the policy questions.*

2.B The FAQ document further weakens the connection between TPB’s climate change goal and project consistency, going out of its way to point out that not all roadway capacity adding projects increase GHG emissions, while failing to note that studies show that in aggregate, these projects do just that.

The draft FAQ document states:

“6. ... it would be incorrect to generalize that all roadway capacity adding projects will increase emissions. For example, vehicles operating at low/congested speeds emits higher number of certain pollutants; they also consume more fossil fuel, which results in higher levels of GHG emissions. Improvements to relieve such congested travel can help to reduce emissions.”

This FAQ #6 needs to include the important context that highway and arterial capacity expansions typically induce more driving and result in [overall more GHG emissions](#).²

² Joe Cortright (2017). [Urban myth busting: congestion, idling and carbon emissions](#). City Observatory, June 26, 2017.

This document should also note that TPB's Climate Change Mitigation Study found that the region must reduce per capita passenger vehicle miles traveled by 20% by 2030 – in addition to meeting TPB's electric vehicle adoption goal – to meet the minimum on-road emissions reductions in the COG 2030 Climate and Energy Action Plan. Meeting TPB's even stronger adopted GHG emissions goal will require shifting even more trips from driving to walking, biking and transit, and reducing trip distances through smart growth land use planning.

2.C CSG is glad to see these clear statements in the FAQs and hope they are retained in the final version (however, with clarification of “funding”, see #3 below):

“3. ...A zero-based budgeting approach will help focus efforts on projects that are in a developmental stage where the TPB goals and priorities can be used to influence the scope of such projects, including dropping them from further consideration if they do not meet TPB goals and objectives.”

“4. ...The set of projects under construction OR have funding would be exempt from TPB member agencies re-examining the decision to implement these projects. This does not preclude the TPB member agency from a re-examination and subsequent change to the project. Member agencies will be asked to re-examine the need, scope, and plans to implement the remaining projects that are not under construction and have no funds expended and to propose changes as appropriate.”

3) Broaden the scope of projects subject to the Zero-Based Budgeting process to reflect the intention of TPB's Board. As proposed by staff, only 1 in 5 projects would be subject to review under the ZBB process, and even a number of projects not completed as far out as 2040 would be exempt.

The TPB Feb. 3 staff memo describes the ZBB Funded/Committed List as comprising only "projects that are active, under construction, or have dedicated funding in the near future."

However, the large majority of projects, 4 out of 5, are considered Funded/Committed by TPB staff in their draft classification of projects. This staff list of “active” or “short-term” projects includes a number of projects with completion dates as far out as 2040. We do not believe only including 1 in 5 projects meets the intent of the TPB board's direction to do Zero-Based Budgeting. Indeed, the TPB Board resolution R19-2021 stated "all projects" minus those with an exemption, suggesting that the application of ZBB would be the rule not the exception.

We ask for a much broader list of projects to be required to go through the ZBB process. While we still wait for clarification from staff on how it devised its draft lists, we ask for a new draft list of Developmental/Non-Exempt projects that includes:

- All projects not in the FY 2023-2026 Transportation Improvement Program (TIP);
- Projects in the TIP but without activity during the six-year TIP period; and
- Projects with no construction funding.

4) Require local jurisdictions to conduct advertised public meetings to guide their development of project submissions for Visualize 2050.

We applaud the TPB's decision to collect comments received on its website during the project solicitation stage and provide them to relevant member agencies. But this process also needs proactive advertisement and public meetings directly with the local and state agencies and local elected officials who will make critical project decisions between now and June.