



## MEMORANDUM

**TO:** Transportation Planning Board  
**FROM:** Lyn Erickson, Plan Development and Coordination Program Director  
**SUBJECT:** Public Comment for the November 2024 TPB Meeting  
**DATE:** November 20, 2024

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

Between noon Tuesday October 15 and noon Tuesday November 19, the TPB received three letters.

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

## PUBLIC COMMENT

### Bill Pugh-Comment via letter - November 15, 2024

Mr. Pugh recaps the targets for reducing greenhouse gas (GHG), writing that TPB should still lead on climate action. He enumerates eight actions TPB and COG should take to advance the goal:

1. Advance the TPB GHG reduction strategies
2. Put GHG reduction and resiliency accountability metrics in Visualize 2050
3. Prioritize transit funding
4. Track accessibly located housing
5. Boost the CommuterCash program
6. Develop alternatives to road widening
7. Demand state-level accountability; and
8. Provide local accountability for VMTs and EVs in local climate action plan monitoring.

### Bill Pugh-Comment via letter - November 19, 2024

Mr. Pugh writes on behalf of The Coalition for Smarter Growth, Washington Area Bicyclist Association, DC Families for Safe Streets, Northern VA Families for Safe Streets, and Fairfax Alliance for Better Bicycling. The letter is asking for TPB board, staff and member agencies to take action on the steps proposed at the October 31 Roadway Safety Summit, including the six action items proposed and calls on individual member jurisdictions to prioritize roadway safety over expanding roads.

### George "Tad" Aburn- Comments via Letter - November 19, 2024

Mr. Aburn urges the TPB to tackle the issues of environmental racism as a result of past transportation plans, and the need to acknowledge that the current regional climate change goals are not aggressive enough. He acknowledges how tough these issues are and calls on the TPB to find those win-win solutions.

## Laura Bachle

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**From:** Bill Pugh <bill@smartergrowth.net>  
**Sent:** Friday, November 15, 2024 3:09 PM  
**To:** TPBcomment  
**Cc:** Stewart Schwartz  
**Subject:** Item 1 Public Comment Opportunity  
**Attachments:** Climate action needed on DMV transportation Nov2024.pdf

Dear Chair Henderson, TPB members and staff,

The Coalition for Smarter Growth has prepared the attached policy recommendations for advancing TPB and local government climate change commitments.

Despite anticipated major setbacks in federal climate policy, you still have the opportunity – and responsibility – to lead on climate action and ensure that this region achieves its adopted greenhouse gas targets.

The memo details these actions that you can take *now* on transportation, the region's largest source of global warming pollution:

1. Advance the TPB greenhouse gas reduction strategies
2. Put climate accountability in Visualize 2050
3. Prioritize transit funding
4. Track accessibly located housing
5. Boost the CommuterCash program
6. Develop alternatives to road widening
7. Demand state-level accountability; and
8. Provide local accountability on transportation and climate

Thank you for your work,

**Bill Pugh, AICP CTP** | Senior Policy Fellow  
**Coalition for Smarter Growth**  
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# Urgent climate action needed on transportation in the DMV region

## Policy brief for Greater Washington officials, November 2024

Despite anticipated major setbacks in federal climate policy, the Washington metro area still has the opportunity – and responsibility – to lead on climate action. Transportation is our largest source of emissions, but current policies and plans are inadequate to meet COG’s regional climate targets, approved by the COG board and Transportation Planning Board (TPB).

TPB analysis has found that the region needs to both reduce per capita vehicle miles traveled (VMT) by roughly 20% *and* rapidly adopt electric vehicles (EVs) to meet the COG 2030 and 2050 greenhouse gas (GHG) reduction targets. Achieving TPB’s separately adopted 2030 GHG target that’s specific to cars and trucks requires even more urgent action.

### Summary action recommendations (more detail below):

1. *Advance TPB GHG strategies* – Direct the TPB to conduct a facilitated consensus-building process to identify and pursue the most promising GHG reduction strategies out of its recent analysis that are necessary to achieve climate targets.
2. *Put accountability in Visualize 2050* – Put GHG reduction and Resilience accountability metrics into the Visualize 2050 long-range transportation plan, including setting per capita VMT and EV adoption targets, and incorporating climate resilience and EV infrastructure costs into the financial analysis.
3. *Prioritize transit funding* – Prioritize transit investment and timely development of a DMV Moves dedicated transit funding package.
4. *Track accessibly located housing* – Direct COG to measure progress toward achieving the adopted Housing Target for locating 75% of new housing near transit and in activity centers.
5. *Boost CommuterCash* – Invest in robust marketing, monitoring and scaling up the new *CommuterCash* regional app-based incentive program for shifting car commutes to transit, carpool, biking and walking.
6. *Develop alternatives to road widening* – Demand that regional highway expansion proposals include robust transit, demand management, and land use alternatives in their detailed NEPA analyses.
7. *Demand state accountability* – Support state-level policies and legislation for climate change accountability in the transportation sector – and oppose efforts to weaken them.
8. *Provide local accountability* – Incorporate transportation accountability measures for VMT and EVs into local climate action plan monitoring, and connect housing production near transit and in walkable activity centers with climate goals.

### Context: lack of accountability and progress on DMV transportation emissions

*Most local governments and the region overall are not on track to reduce transportation greenhouse gas (GHG) emissions enough to meet their climate change commitments*

- Current plans and policies will not achieve the COG 2030, 2050 GHG reduction targets.

- Multiple studies show that a rapid transition to electric vehicles – while essential – is not sufficient to reduce emissions quickly or deeply enough to achieve GHG targets. A 20% reduction in per capita VMT through public policies that make the region less car dependent – by 2030 and with further improvement by 2050 – is also needed.
- The region and localities must do more to shift trips to transit, walking, and biking, and foster shorter car trips through land use, housing and transportation policies.
- These efforts also would help achieve safety, affordability, equity, livability, and sustainability goals in ways that simply switching to electric vehicles by itself will not.

*TPB's current adopted plan, Visualize 2045, and draft update, Visualize 2050, would fall far short in getting the region to its GHG and resilience goals, as they continue to prioritize highway expansion and lack climate change accountability measures*

- TPB's 2022 adopted long-range plan, Visualize 2045, would barely reduce per capita passenger car Vehicle Miles Traveled (the average miles of driving per resident), falling far short of what TPB's 2021 *Climate Change Mitigation Study* identified.
- This is because: a) Visualize 2045 would invest \$28.2 billion in highway expansion in contrast to \$14.6 billion for improving other modes, and b) slow progress by suburban jurisdictions in shifting away from car-dependent land use plans and failing to allow and promote more housing near transit and in walkable, accessible activity centers.
- The Visualize 2050 update to the long-range plan shows little progress in reducing car dependency, widening approximately 700 miles of highways and arterials.

### **Actions that DMV Officials Need to Take Now**

1. **Advance TPB GHG strategies** – Direct TPB staff to develop a facilitated consensus-building process to identify and pursue with urgency the most promising strategies in the agency's *Implementation Considerations for On-Road Transportation GHG Reduction Strategies* report.
2. **Put accountability in Visualize 2050** – The TPB is currently updating the region's long-range transportation plan, Visualize 2050. However, it lacks accountability metrics for climate action. These simple metrics for accountability on GHG reduction and Resilience are needed in Visualize 2050:
  - a. Establish per capita light-duty vehicle VMT reduction (20% by 2030, 25-30% by 2050) and EV adoption performance measures to achieve the COG and TPB GHG targets and incorporate these into the Visualize 2050 plan and other TPB initiatives.
  - b. Incorporate order-of-magnitude costs for regional transportation resilience and EV charging infrastructure needs into the plan's Financial Analysis.
3. **Prioritize transit funding** – Prioritize transit investment and timely development of a DMV Moves regional funding package that will maintain and enhance the region's transit system, for both operating and capital needs.

4. **Track accessibly located housing** – Direct COG to provide a status update on progress toward achieving the 2019 adopted Housing Target for locating 75% of new housing near transit and in activity centers. TPB has found that implementing the housing targets would be one of the most effective congestion-reduction strategies. The target is also an essential component in COG’s 2030 climate plan.
5. **Boost CommuterCash** – Invest in robust marketing, monitoring and scaling up the new *CommuterCash* regional app-based incentive program for shifting car commutes to transit, car/vanpool, active transportation and other alternative modes. TPB Commuter Connections has planned a Dec. 2024/Jan. 2025 launch, but success depends on strong regional/local promotion. Local governments need to ensure that CommuterCash marketing is budgeted in the work plans of their commuter assistance agencies.
6. **Develop alternatives to road widening** – Demand that regional highway expansion proposals include robust transit-demand management-land use build alternatives in their detailed NEPA analysis – and oppose projects that do not fairly evaluate non-widening alternatives. Project examples that have not meaningfully evaluated alternatives to date include MDOT’s American Legion Bridge + 270 program and VDOT’s 495 Southside Express Lanes widening project.
7. **Demand state accountability** – Support state-level policies and legislation for climate change accountability in the transportation sector – and oppose efforts to weaken them. Examples:
  - a. Virginia: Protect VTrans sustainability and mode choice goals;
  - b. Maryland: support MDOT efforts to overhaul its project prioritization process, and support the Transportation & Climate Alignment Act in the General Assembly.
  - c. DC: support parking cashout implementation and continued bus priority program progress.
8. **Provide local accountability** – Incorporate transportation accountability measures into local climate action plan monitoring, and connect housing production with climate goals.
  - a. Local governments need to set per capita VMT reduction and/or mode shift targets combined with their EV adoption goals that are sufficient to achieve their overall GHG reduction targets.
  - b. Local housing plans and policies need to recognize the climate benefits of increasing both housing production and dedicated affordable housing near transit stations, high-frequency corridors, and accessible activity centers.

See the following pages for additional information on regional context and recommended action steps for officials.

## Appendix: Status of Regional Transportation-Climate Targets

Transportation is a top source of regional Greenhouse Gas Emissions, but current plans fall short

- Transportation is our region's largest source of emissions. Most of it is from cars and trucks.<sup>1</sup> In some local jurisdictions, transportation is responsible for almost half of their GHG emissions.<sup>2</sup>
- COG has an adopted target for an overall [50% reduction in GHG emissions by 2030](#) relative to the 2005 level. (the COG plan assumes a roughly 33% reduction in on-road GHG emissions combined with greater relative reductions from the electricity and building sectors to achieve the overall target)
- In June 2022, the National Capital Region Transportation Planning Board (TPB) adopted an [even stronger target to tackle transportation emissions](#): a 50% reduction in GHG emissions from on-road transportation sources (i.e., cars and trucks) by 2030 relative to the 2005 level.
- Unfortunately, adopted transportation plans fall short of what's needed to meet the COG target, local government targets, and the TPB target. TPB's Visualize 2045 plan would only reduce emissions by 18% by the year 2045.
- TPB's *Climate Change Mitigation Study* (see below) identified feasible transportation strategies to achieve the COG 2030 GHG reduction target and many local targets, but the region has not committed to these measures yet. The more ambitious TPB 2030 GHG reduction target would require even more urgent action.

Reducing Car and Truck GHG Emissions – Electric Vehicles are essential but not enough to meet climate targets and address other needs

- [TPB's 2021 Climate Change Mitigation Study](#) and numerous other [national](#) and [international](#) studies have shown that rapid adoption of electric vehicles alone will not lower transportation emissions enough to meet our GHG reduction targets. Local and state governments also have to reduce the need to drive for daily needs, which lowers total Vehicle Miles Traveled (VMT), to reduce GHG emissions quickly and deeply enough.
- US regions [must reduce per capita passenger car VMT on the order of 20% by 2030](#) and further by 2050.

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<sup>1</sup> Some GHG inventories group together residential and commercial buildings as a single source, in which case, buildings are the largest category, with transportation a close second. MWCOG's last GHG inventory was in 2020 (peak pandemic year), in which transportation comprised 39% of region emissions; the previous inventory was in 2018, when transportation comprised 42% of emissions. ([MWCOG 2022](#), [MWCOG 2020](#)).

<sup>2</sup> 2018 GHG contributions of transportation of the region's large jurisdictions were: [Prince George's County](#) 48%, [Fairfax County](#) 44%, [Montgomery County](#) 42%, and the [District of Columbia](#) 22%.

- Benefits of smart growth extend far beyond GHG reduction – Prioritizing walkable, bikeable, transit-friendly communities shifts trips to more sustainable modes and shortens driving distances to reduce VMT. This also addresses other important transportation goals that electric cars and trucks on their own do not. These include improved safety, equitable access to jobs and services, more travel choices, greater affordability, supporting active lifestyles, less pollution and environmental damage, and open space preservation.
- These many co-benefits are why metropolitan Washington’s adopted vision, [Region Forward, has a goal to reduce VMT](#), and so do most area local governments and the State of Maryland.
- Shifting investments from highway and arterial capacity expansion to transit, walking, biking, demand management programs, and putting more housing in accessible transit-friendly locations also reduces overall government spending and financial demands. For the U.S. as a whole, this climate strategy [saves \\$2 trillion](#) in federal, state, and local government infrastructure spending by 2050.

## Highway and arterial expansion generally worsens greenhouse gas emissions – and doesn’t fix congestion

- Contrary to [claims by many highway agencies](#), studies show that [road widening typically results not only in more driving but also more emissions](#). Reducing traffic congestion can lower a car’s tailpipe pollution per mile driven, but expanding highways and roads generally induces more people to drive more miles and offsets those carbon emission reduction benefits – worsening our climate problem.
- Induced demand is well established and explains why adding more and more lanes has not fixed traffic congestion, instead *increasing* how much we drive for daily needs and *increasing* emissions. See [CSG’s Induced Demand Overview for Metro DC](#) for more background and local case studies.
- DMV area transportation plans would substantially increase lane miles and undermine climate action. For example, the Northern Virginia Transportation Authority’s *TransAction* plan would build over 1,000 lane miles of highways and arterials and result in the average Northern Virginia resident actually [driving more per day](#) than they do currently.

## TPB’s adopted plan Visualize 2045 (and draft Visualize 2050) would fall far short in helping region meet its GHG targets, even with rapid EV adoption

- TPB’s adopted long-range plan, [Visualize 2045](#), would only reduce per capita passenger car VMT by 5% by the year 2045, falling far short of the approximate 20% reduction needed by 2030, according to TPB’s *Climate Change Mitigation Study*, to meet the COG GHG target.

- This is in part because Visualize 2045 would invest \$28.2 billion in highway expansion (building almost 900 new lane miles) in contrast to \$14.6 billion for improving other modes.
- And it is also due to slow progress by suburban jurisdictions in shifting away from car-dependent land use plans and housing policies, with continued sprawl and too little new housing near transit. Unfortunately, the TPB plan update under development, Visualize 2050, shows little progress in reducing car dependency.
- CSG in 2022 advocated for TPB to commit to the COG target level needed for on-road transportation **and** to include performance metrics for necessary EV adoption and per capita VMT reduction. The TPB board ended up adopting a more aggressive 50% GHG reduction target for on-road transportation, but did not set performance measures to help next steps or provide accountability.
- Over the next few months, regional officials have the opportunity to direct TPB staff to set per capita VMT reduction and EV adoption performance measures at necessary levels to achieve the COG and TPB GHG targets and incorporate these into the Visualize 2050 plan and other TPB initiatives.

## TPB adopted GHG reduction strategies in 2022 but has not pursued them with urgency or accountability

In June 2022, TPB adopted the following GHG reduction strategies to pursue. However, only this Fall (over two years later) has the agency produced any follow-up analysis (see next page), aside from its ongoing shared electric vehicle work with the COG Environment department.

### *On-road GHG Reduction Strategies Adopted As Priorities by the TPB Board:*

1. Improve walk/bike access to all TPB identified high-capacity transit stations.
2. Increase Walk/Bike modes of travel - Complete the TPB's National Capital Trail Network by 2030.
3. Convert private and public sector light, medium and heavy-duty vehicles, and public transit buses to clean fuels, by 2030.
4. Deploy a region-wide robust electric vehicle charging network (or refueling stations for alternate fuels).
5. Add additional housing units near TPB-identified high-capacity transit stations and in COG's Regional Activity Centers.
6. Reduce travel times on all public transportation bus services.
7. Implement transportation system management & operations (TSMO) improvement measures at all eligible locations by 2030.

### *Additional Strategies adopted by the TPB Board To Be Explored In Coordination At Local and State Levels:*

1. Transit-Oriented Development – Take action to shift growth in jobs and housing from locations currently forecast to locations near TPB-identified high-capacity transit



- stations and in COG's Regional Activity Centers, within jurisdictional boundaries, to improve the jobs-housing balance locally.
2. Make all public bus transportation in the region fare-free by 2030.
  3. Make all public rail transportation in the region fare-free by 2030.
  4. Price workplace parking for employees – only in Activity Centers by 2030 and everywhere by 2050
  5. Convert a higher proportion of daily work trips to telework by 2030 and beyond.
  6. Charge a new fee per vehicle mile of travel (VMT) by motorized, private, passenger vehicles in addition to the prevailing transportation fees and fuel taxes.
  7. Charge a “cordon fee” (Commuter tax) per motorized vehicle trip for all vehicles entering Activity Centers in the core of the District of Columbia, by 2030.

Of the 14 GHG above reduction strategies adopted by TPB in 2022 to implement or explore further, 12 of these are mode shift and travel demand strategies to reduce VMT. However, TPB has not tracked progress on these or required member agencies to prioritize these strategies in its current Visualize 2050 plan. Member agencies [didn't even provide required explanations of how their projects supported regional climate goals](#). TPB has done valuable electric vehicle analyses to support the COG Environment department's regional EV work. However, the lack of urgency and accountability on its 2022 greenhouse gas reduction targets and strategies in the Visualize 2050 process and overall TPB work program is a factor in the region falling behind on its climate commitments.

## TPB Oct. 2024 analysis of most promising GHG reduction strategies

TPB released last month its analysis [Implementation Considerations for On-Road Transportation GHG Reduction Strategies](#) (and [summary slide deck](#)). The study by consultant ICF is an excellent analysis, reviewing the literature on each strategy. It assessed the strategies listed above to “explore further, and also analyzed these additional ones selected by the study team:

8. Implement a carbon pricing program or increase in fuel taxes.
9. Implement pay-as-you-drive (PAYD) insurance requirements.
10. Implement employer-based parking cash-out program requirements.
11. Reduce VMT associated with school-based trips.
12. Incentivize electric bicycle (e-bike) adoption.
13. Disincentivize parking through parking reforms.
14. Convert existing highway lanes to high-occupancy toll (HOT) lanes.
15. Expand microtransit / first mile-last mile service in the region.
16. Expand programs to incentivize carpooling and vanpooling.

### Key Findings:

#### *Highest GHG reduction impacts:*

- Transit-oriented development, shifting growth to transit corridors/activity centers

- VMT fee
- Cordon fee (congestion pricing zone)
- Carbon pricing

*Most co-benefits for achieving additional regional goals:*<sup>3</sup>

*Positive benefits in 4 out of 8 goals*

- Transit-oriented development, shifting growth to transit corridors/activity centers
- E-bike incentives
- Low or no transit fares
- Additional microtransit services

*Positive benefits in 3 out of 8 goals*

- Parking cashout
- Parking reform
- Pay As You Drive car insurance
- VMT fee
- Carbon pricing
- Telework

*Positive benefits in 2 out of 8 goals*

- Convert existing highway lanes to HOT lanes
- Cordon fee
- Carpool/Vanpool incentives

*Factors to consider*

- Some strategies can be implemented relatively quickly (parking cashout, e-bike incentives, parking reform) while others take longer at a regional scale (e.g., transit-oriented development). Others can be implemented as part of already planned projects (e.g., converting existing lanes to HOT lanes rather than widening).
- Fiscal cost/benefits – some strategies bring in revenue (e.g., road/congestion pricing), or provide direct financial benefits to households (e.g., parking cashout, transit-oriented development); while others may require more public sector expenditures (e.g., fare-free transit) or provide upfront costs to some households (e.g., road pricing) but that could be offset through improved public transit and travel time savings.

*Study Conclusions:*

- “While some strategies may have counteracting effects, the most effective approach would pair “sticks” (strategies that disincentivize driving) with “carrots” (strategies that expand, enhance, or incentivize using transit, ridesharing, bicycling, walking, or telework).”

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<sup>3</sup> Regional goal and priorities categories used: Accessibility and Affordability, Environmental Quality, Equity, Infrastructure Condition, Livability and Prosperity, Reliability and Efficiency, Resiliency, and Safety.

- “This could provide synergistic effects by providing the public with viable options and alternatives to driving, while addressing affordability and equity concerns and likely leading to more public support.”

## Laura Bachle

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**From:** Bill Pugh <bill@smartergrowth.net>  
**Sent:** Tuesday, November 19, 2024 12:00 PM  
**To:** TPBcomment  
**Subject:** Item 1 Public Comment Opportunity - additional letter  
**Attachments:** Joint safety letter to TPB board Nov 19 24.pdf

Dear TPB staff,

For tomorrow's board meeting:

The Coalition for Smarter Growth, Washington Area Bicyclist Association, DC Families for Safe Streets, Northern VA Families for Safe Streets, and Fairfax Alliance for Better Bicycling submit this letter to the board asking for TPB board, staff and member agency action on the safety action steps proposed at the October 31 Roadway Safety Summit.

Thank you,

**Bill Pugh, AICP CTP** | Senior Policy Fellow  
**Coalition for Smarter Growth**  
[www.smartergrowth.net](http://www.smartergrowth.net) | @betterDCregion  
[bill@smartergrowth.net](mailto:bill@smartergrowth.net)  
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November 19, 2024

Hon. Christina Henderson, Chair  
National Capital Region Transportation Planning Board  
Washington, DC

**Re: 394 fatalities is not acceptable. The TPB region needs more action for safer streets.**

Dear Chair Henderson and TPB Board members,

We thank TPB staff and leadership for organizing the Regional Roadway Safety Summit last month and appreciate the TPB board members who participated in the event.

You heard the troubling stats on crashes, injuries and fatalities (394 traffic deaths in 2023); and on your November meeting agenda, you will see that the TPB region last year failed all five of its roadway safety targets – again.

Now is your opportunity to act on the good ideas proposed at the Safety Summit. We ask that:

1. **TPB members advance the six action items proposed** (included below). Of particular importance for a regional body like TPB is to bring together Maryland, Virginia and DC officials to address ticket reciprocity and hold dangerous drivers accountable across jurisdictions.
2. **Individual member jurisdictions prioritize roadway safety over expanding roads** as you budget limited transportation dollars.

This past Sunday was the World Day of Remembrance for Road Traffic Victims, and in our region, over 600 people participated in the Ride for Your Life and vigil, which remembers mother and U.S. diplomat Sarah Debbink Langenkamp, killed by a driver in Bethesda in 2022. Your action at this month's board meeting for safer streets would be especially timely.

Thank you for your work,

Bill Pugh  
Senior Policy Fellow  
Coalition for Smarter Growth

Kevin O'Brien  
Virginia Organizer  
Washington Area Bicyclist Association

Mike Doyle  
Founding Member & President  
NoVA Families for Safe Streets

Joy Faunce  
President  
Fairfax Alliance for Better Biking

Christy Kwan  
Volunteer Co-Chair  
DC Families for Safe Streets

### ***Action Ideas Proposed at the Oct. 31 TPB Regional Roadway Safety Summit***

1. *Inventory and report on safety-supportive activities undertaken by TPB members pertaining to TPB Safety Resolution R3-2021*
2. *Join the USDOT's Allies in Action partnership*
3. *Partner with and assist COG to develop a multi-jurisdictional arrangement to fully enforce traffic laws and hold dangerous drivers to account (including reciprocity of automated enforcement)*
  - *Gather more data about the impacts of automated enforcement systems*
4. *Continue to provide input on federal safety rulemaking and coordinate with COG on regional advocacy strategies*
5. *Regionally track/raise awareness of transportation safety funding opportunities*
6. *Assist member jurisdictions to pursue Vision Zero activities*
  - *Gather information on what has worked best in Vision Zero plans elsewhere*
  - *Link inventories and plans to each of the identified top factors involved in crashes*
  - *Use a systemic approach of preventive measures*
  - *Enhance coordination with non-transportation partners such as medical examiner offices*
  - *Explore emerging technologies*
  - *Initiate a regional Vision Zero plan*

## Laura Bachle

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**From:** George Aburn <tadaburn@gmail.com>  
**Sent:** Tuesday, November 19, 2024 11:25 AM  
**To:** TPBcomment; Lyn Erickson  
**Cc:** chenderson@dccouncil.gov; Jeffrey King; Kenny Boddye; tedernoga@co.pg.md.us; Julie Kimmel; Ivey, Jolene; Takis Karantonis  
**Subject:** Item 1 Virtual Comment Opportunity  
**Attachments:** TPB 11202024 Final Written TPB Comment.pdf

Lyn - Please register me to provide virtual comments during the November 20, 2024 TPB meeting. I will not be attending the meeting to provide in-person comments.

My comments are attached.

If you could please confirm receipt, and provide a response consistent with the TPB Public Participation Plan and guidance, it would be greatly appreciated.

I will also be submitting a 11/19 letter to CEEPC for the TPB record.

Thanks again for your help.

Tad Aburn

(443) 829-3652

Comments for the November 20, 2024 TPB Meeting

Tad Aburn<sup>1</sup>

[tadaburn@gmail.com](mailto:tadaburn@gmail.com)

(443) 829-3652

\*\*\*\*\*

Madame Chair, TPB members ... Thank you for the opportunity to provide virtual public comment today.

Could you please use the language below (bold Italics) in the MWCOG staff summary of my comments:

***“For over two years, I have been pushing TPB to tackle two very difficult problems. I appreciate the internal discussions that have been taking place within MWCOG on these two issues.***

***The two issues are:***

- ***The need to end the legacy created by the transportation planning process ... where TPB transportation plans ... which build from local land use and zoning decision making ... unintentionally have evolved into a form of environmental racism as high polluting transportation projects are built in areas with certain zoning, over and over again. This has resulted in low cost housing and the creation of environmental justice areas breathing very unhealthy air.***
- ***The need to acknowledge that the current MWCOG regional climate change goals are not supported by science and are weak. This means that TPB needs to be more aggressive ... by considering more VMT and TDM strategies ... as part of the TPB greenhouse gas emission reduction plan.***

***These two issues are no longer questions. They are both commonly accepted as being real and need to be moved onto the front burner of the TPB process. They can no longer be kept in the background ... they will not go away.***

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<sup>1</sup> As background, my name is Tad Aburn. I have submitted comments on this issue at every TPB meeting since November of 2022. I am retired, was a Maryland resident for 68 years and I am now doing volunteer work for overburdened communities in Prince George’s County and the District of Columbia. I am also a member of the DC EJ Coalition. In 2022, I was the Chair of MWAQC TAC. I was an MWAQC member for over 10 years. For almost 20 years I was the Director of the air pollution program in Maryland. I worked for MDE for 40 years.



***TPB is nationally recognized for tackling tough issues and for finding creative win-win solutions. These issues are very, very tough ... the general public needs groups like TPB to dig in ... and find those win-win solutions."***

Thank you again for the work you do and for providing the opportunity to provide public comment.