



## **MEMORANDUM**

**TO:** Transportation Planning Board  
**FROM:** Lyn Erickson, Plan Development and Coordination Program Director  
**SUBJECT:** Public Comment for the March 2023 TPB Meeting  
**DATE:** April 19, 2023

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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)), Visualize 2045 Initial Project List Feedback Form (<https://www.surveymonkey.com/r/Viz2050Update>), 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.

Public comments received from the Visualize 2045 feedback form are shared with the TPB Technical Committee at their monthly meeting. Comments already shared with the Technical Committee are denoted with an asterisk (\*). Comments received after the April 2023 Technical Committee meeting will be shared at May's meeting.

Between noon at Tuesday, March 14 and noon on Tuesday, April 18, 2023, the TPB received 11 comments submitted via email and 13 submissions from the Visualize 2045 Initial Project List Feedback Form.

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

### **PUBLIC COMMENT FROM VISUALIZE 2045 FEEDBACK FORM**

#### **Steve Wardell – Project Comment via Online Form – March 14, 2023\***

Wardell provided feedback about the VA 7, Widening project suggesting that adding additional road capacity increases miles driven, which results in additional carbon emissions. They added that they would like to see more congestion pricing projects.

#### **Alex Goyette – Project Comment via Online Form – March 15, 2023\***

Goyette provided feedback about the VA 28, Widening (Fairfax) project stating that there are too many roadway widening projects which results in induced driving and increased emissions. They suggest that funding should be prioritized for maintaining existing infrastructure and climate-friendly transportation options. They shared support for the Duke St. BRT project.

#### **Anonymous – Project Comment via Online Form – March 16, 2023\***

A commenter shared support for the Richmond Highway Corridor Improvements.

#### **Greg Visscher – Project Comment via Online Form – March 17, 2023\***

Visscher provided feedback about the MD 28/MD 198 Corridor Study expressing support for another Potomac River crossing connecting Montgomery County and Loudoun County.

**Nancy Soreng – Project Comment via Online Form – March 18, 2023\***

Soreng provided feedback about the Op Lanes Maryland Phase 1 project expressing concern about climate and the environment. They expressed support for the Brunswick Line project, stating train frequency would benefit the environment and I-270 congestion. They added a suggestion about incentives to expand telecommuting.

**Mary Stickles – Project Comment via Online Form – March 20, 2023\***

Stickles provided feedback about the Montrose Parkway project expressing concern about the railroad crossing and supporting re-routing the road above the tracks. They expressed feedback about the Viers Bus Rapid Transit project and shared support for more east-west transit routes, and pedestrian/bike improvements on the route. They expressed support for the Brunswick Line project and more frequency.

**Mark Scheufler – Project Comment via Online Form – March 22, 2023\***

Scheufler provided feedback about several projects including Route 1 Improvements (CE2161) project stating that traffic does not warrant high priority highway expansion; Rippon Boulevard Extension suggesting an update to the project description; Wellington Road Improvements suggesting update to the project description and combine with CE2145; Route 1 Improvements (CE1942) suggesting update to the project description; and Route 1 Improvements (CE2685) suggesting update to the project description. They also suggested 15 projects for consideration in Virginia.

**Mark Scheufler – Project Comment via Online Form – March 22, 2023\***

Scheufler provided feedback about several projects including Route 1 Improvements (CE3180) suggesting update to the project description. They provided feedback that Catharpin Road, Widening, McGraws Corner Drive, Vint Hill Road Improvements, and John Marshall Widening (CE3694) projects should be funded by a developer. They expressed support for the Union Station to Georgetown Streetcar Line.

**Mark Scheufler – Project Comment via Online Form – March 22, 2023\***

Scheufler provided feedback about several projects including Dale City Parkway Node New Through Boulevard stating the project should be funded by a developer; Battlefield Park Bypass project suggesting an alternative alignment; and US 15 Improvements (CE3162) should be combined with CE1803.

**Arlene Montemarano – Project Comment via Online Form – March 24, 2023\***

Montemarano provided feedback about the Op Lanes Maryland Phase 1 project submitting a Washington Post article “Maryland residents won when a toll-lane plan failed” from March 21, 2023.

**Arlene Montemarano – Project Comment via Online Form – March 26, 2023\***

Montemarano provided feedback about the Op Lanes Maryland Phase 1 project stating concern about heat from new pavement.

**Anonymous – Project Comment via Online Form – April 13, 2023**

A commenter shared feedback on the Districtwide Bicycle and Pedestrian Management program and the Union Station to Georgetown Streetcar Line sharing concern about restricted traffic flow.

**Kacy Kostiuk – Project Comment via Online Form – April 15, 2023**

Kostiuk, a former Takoma Park councilmember, shared feedback about several projects including Op Lanes Maryland Phase 1 expressing concern over climate and traffic impacts; Middleton Bridge Replacement expressing support for bike lanes on the project; MARC Run-through Service to Virginia expressing support for alternatives to driving; MD 650 New Hampshire Avenue BRT expressing support for connectivity with other transit options.

**PUBLIC COMMENT**

**Arlene Montemarano – Article via Email – March 21, 2023**

Montemarano shared an article, "[McLean residents sue to stop I-495 widening over environmental impacts](#)" by Angela Woolsey.

**Arlene Montemarano – Article via Email – March 22, 2023**

Montemarano shared an article, "[Opinion: Maryland residents won when a toll-lane plan failed](#)", by Robert McGary.

**Bill Pugh – Letter via E-mail – March 28, 2023**

Pugh, on behalf of the Coalition for Smarter Growth, submitted comments for Virginia TPB Board Members consideration as they re-examine and re-submit projects. A letter titled "Visualize 2050 project submissions need to change to reflect adopted regional policies for climate, safety, equity, and walkable transit-friendly communities" with detailed suggestions is enclosed.

**Lindsey Mendelson – Letter via E-mail – March 29, 2023**

Mendelson, on behalf of the Maryland Sierra Club, submitted a letter with detailed comments regarding Visualize 2050 as the TPB re-examines and re-submits projects. An enclosed letter asks the TPB to remove the I-495 and I-270 toll lane projects, and other highway widening projects and promote transit, TOD, and pedestrian/cycling infrastructure projects.

**Bill Pugh – Letter via Email – March 29, 2023**

Pugh, on behalf of the Coalition for Smarter Growth, submitted comments for Maryland TPB Board Members consideration as they re-examine and re-submit projects. A letter titled "Visualize 2050 project submissions need to change to reflect adopted regional policies for climate, safety, equity, and walkable transit-friendly communities" with detailed suggestions is enclosed.

**Sally Stolz – Letter via Email – March 29, 2023**

Stolz, Co-Coordinator of DontWiden270.org, submitted comment asking the TPB Board Members to remove the I-495/I-270 Op Lanes projects from the long-range plan. A letter detailing concerns related to the project is enclosed.

**Tina Slater – Comment via Email – March 29, 2023**

Slater submitted comments asking the TPB member agencies to review and revisit all projects not currently under construction or in final stages of design for Visualize 2050. They asked the TPB to remove the I-495/270 project from the plan, and to consider sustainable and equitable alternatives. They also suggested other projects for consideration.

**Margaret Schoap – Comment via Email – March 29, 2023**

Schoap, on behalf of the Tame Coalition, submitted comments suggesting that Middlebook Road Extended Widening should be removed from long-range transportation plan citing the removal of the Midcounty Highway Extended/M83 as a similar project.

**Arlene Montemarano – Comment via Email – March 31, 2023**

Montemarano forwarded a newsletter from “In the Public Interest” promoting a book, *Privatization of Everything*. They added comments sharing concern for public-private partnerships.

**Gail Sullivan – Comment via Email – April 13, 2023**

Sullivan, a CAC member, shared concern about express lanes being incorporated into major road projects. They added that express lanes should prioritize buses, motorcycles, and bicycles, and that improving public transportation may cause people to consider environmentally friendly modes.

**Tad Aburn – Letters via Email – April 18, 2023**

Aburn, a former Maryland Department of the Environment representative of MWACQ, shared comments asking about how the TPB is addressing how regional transportation planning unintentionally creates environmental justice concerns. They included several letters with additional detail on their concerns.

**Public Comment Received from February 15 – April 18, 2023**

The comments outlined below were received from the Visualize 2045 Initial Project List Feedback Form (<https://www.surveymonkey.com/r/Viz2050Update>) from February 15 – April 18, 2023 at 12PM. TPB staff has organized the original responses to the feedback form by state. Comments are reported monthly at the TPB Technical Committee and TPB meetings.

**Table 1. District of Columbia Project Comment**

Date	Project	How did you learn about this project?	I support this project's inclusion in Visualize 2050?	Explain why you support/do not support the project's inclusion in the Visualize 2050. You can also share other comments about the project's inclusion in the plan.	Name
2/28/2023	Union Station to Georgetown Streetcar Line	Project webpage	Neutral		
3/22/2023	Union Station to Georgetown Streetcar Line	Project webpage	Strongly agree		Mark Scheufler
4/13/2023	District-wide Bicycle and Pedestrian Management Program	Project webpage	Strongly disagree	the existing bike lanes have constrained and restricted traffic flow. This program does not increase traffic throughput, it in fact impedes it. Secondly, because the bike lanes are both on the right hand side of the road and the fact that it is slowing traffic has increased the danger to both bike riders, pedestrians, and drivers by forcing the drivers to make a right hand turn from the middle lane.	
4/13/2023	Union Station to Georgetown Streetcar Line	Project webpage	Strongly disagree	Given the constraints to traffic from the bike lanes, further impeding traffic in a high traffic area by taking away lanes for a street car makes no sense. If the bike lanes go away, then and only then, does it make sense to remove another lane for street cars.	

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**Table 2. Maryland Project Comment**

	Project	How did you learn about this project?	I support this project's inclusion in Visualize 2050?	Explain why you support/do not support the project's inclusion in the Visualize 2050. You can also share other comments about the project's inclusion in the plan.	Name
3/13/2023	I-270	Advocacy organization	Disagree	Any highway widening project 1) will induce MORE driving, not less, adding more pollution to the air, and 2) is a missed opportunity to invest in better bus rapid transit, light rail, or heavy rail. If so many people are using these highways and getting stuck in traffic it's a sign to "upgrade" to a higher-capacity system like buses or rail. Please apply my comment to any and all proposed highway widening projects in Maryland.	
3/13/2023	MARC Improvements	Advocacy organization	Strongly agree	We NEED to prioritize better rail infrastructure. Electrification; greater service frequency; and better connections to other public transit systems must be top of the list and should be prioritized above ANY highway-widening projects to meet our climate goals and protect the environment for our children.	
3/17/2023	MD 28/MD 198 Corridor Study, Potomac River Bridge to Loudon County Connecting MD-28 Into Dulles, VA	Friend/colleague, Lived EXPERIENCE	Strongly agree	We badly need another Potomac River crossing connecting Montgomery County, MD and Loudon County, VA. For security, faster transport, better economics, and so much more.	Greg Visscher

3/18/2023	Op Lanes Maryland Phase 1	News/media, It impacts an organization I'm affiliated with	Strongly disagree	It will damage the environment, worsen climate change, will only benefit the wealthy and the developers, widening roads doesn't reduce traffic and the American Legion Bridge is structurally sound and just needs re-decking	Nancy Soreng
3/18/2023	Brunswick Line	Advocacy organization	Strongly agree	Expanding more frequent trains would take pressure off I 270 and be better for the environment	Nancy Soreng
3/20/2023	Montrose Parkway	Neighborhood/civic association	Neutral	The verbal description of the project and previous information I received described this as a NEW road. But the map included with the description shows just the segment crossing the railroad tracks. I SUPPORT re-routing the road above the railroad tracks. That crossing is extremely dangerous and I currently try to avoid it whenever possible.	Mary Stickle
3/20/2023	Veirs Mill Bus Rapid Transit	Neighborhood/civic association	Strongly agree	More and more reliable east-west transit routes are needed in the MD DC suburbs. Bus rapid transit seems to be the quickest and most cost effective option. I also support the pedestrian and bike improvements along that route.	Mary Stickle
3/20/2023	Brunswick Line	Project webpage	Strongly agree	We need more and more dependable transit options in the MD DC suburbs. Brunswick line does not run frequently enough to be well used as it could be.	Mary Stickle
3/24/2023	Op Lanes Maryland Phase 1	Neighborhood/civic association		I submit this article from WAPO, in case you missed it. Good points. <a href="http://www.washingtonpost.com">www.washingtonpost.com</a> washingtonpost.com Opinion Maryland residents won when a toll-lane plan failed Mar. 21st, 2023 Kudos to the people of Maryland for getting Transurban to walk away. Its expensive, lopsided project would ultimately yield little to no benefit to Marylanders. I recently moved away from Northern Virginia,	Arlene Montemarano

				<p>where traffic is seemingly as bad as it has ever been. A thoughtful, multifaceted plan that could include toll roads would prove far superior to the Transurban profit-oriented model, and it would be much less expensive to complete through traditional governmental project financing. Tolls would be lower, and the project would not come with revenue guarantees and noncompete clauses that come with many public-private partnership contracts. Virginia is locked into decades of such restrictions with Transurban, such as not being allowed to expand Metro's Orange Line for 10 years, little say over toll prices, and not being able to improve secondary roads to ease traffic without Transurban approval, plus state revenue subsidies if HOV riders are too numerous. This interferes with local governmental autonomy to provide for citizens and is contrary to the goals of an effective transportation program. I urge Marylanders to embrace this opportunity to build an effective plan for the new era. You have dodged a bullet; the real tragedy would be if Transurban returns. Robert McGary, Glen Allen, Va.</p>	
3/26/2023	Op Lanes Maryland Phase 1 (Creating more of a heat sink as the planet gets hotter.)	Advocacy organization	Strongly disagree	<p>There are a multitude of reasons to remove this project. Here is another that should be taken seriously: Heat. In addition to the well-researched fact that induced car travel offsets the temporal traffic fluidity gained after adding a new lane, there is the large amount of heat that additional pavement generates which is permanent, not temporal. That reality is explained by the fundamental thermal formula <math>Q = Mc\Delta T</math> where Q is the amount of heat released, M the mass (of a new lane in this case), c the specific heat of the material (concrete or asphalt in this case), and</p>	Arlene Montemarano



				$\hat{T}$ the temperature increase. Given the large M added with a miles-long new lane, a large amount of pavement heat (Q) will be generated when temperature increases ( $\hat{T}$ ). With summers becoming hotter and hotter, there is nothing trivial about the additional heat that new pavement brings.	
4/15/2023	Op Lanes Maryland Phase 1	Multiple sources	Strongly disagree	This project is deeply concerning because of the climate impact it would have. It would also likely generate additional traffic overall and on other roads that do not have capacity to support them.	Kacy Kostiuk
4/15/2023	Governor Harry W. Nice/Senator Thomas "Mac" Middleton Bridge Replacement Project	Serving on the TPB previously	Strongly disagree	This project does not allow for bike lanes, which the TPB previously requested as part of the project. Although this project is now likely farther along in the process, I hope MDOT will reconsider options to support bike lanes on this project.	Kacy Kostiuk
4/15/2023	MARC Run-through service to Virginia	Project webpage	Strongly agree	Improved rail would be a great asset and a big improvement to allow for residents living further away from the region's center alternatives to driving	Kacy Kostiuk
4/15/2023	MD 650 New Hampshire Avenue BRT	Neighborhood/civic association	Strongly agree	The New Hampshire Ave BRT project would be very beneficial to numerous neighborhoods and would improve connectivity with other high occupancy transit options (especially the Purple Line and the Red Line).	Kacy Kostiuk

**Table 3. Virginia Project Comment**

	<b>Project</b>	<b>How did you learn about this project?</b>	<b>I support this project's inclusion in Visualize 2050?</b>	<b>Explain why you support/do not support the project's inclusion in the Visualize 2050. You can also share other comments about the project's inclusion in the plan.</b>	<b>Name</b>
2/27/2023	Arcola Boulevard Improvements	Friend/colleague	Neutral		
2/27/2023	I-66 Improvements		Strongly disagree	The Transform I-66 Megaprojects--both outside and inside the Beltway--have largely been completed. If there are a few remaining elements from those projects that VDOT wants to retain in Visualize 2050, those elements should be resubmitted as separate, clearly described projects. Also, any additional widening of I-66 inside the Beltway should be clearly tied to a firm commitment by VDOT to toll I-66 in both directions, either during the eight peak weekday commuting hours or ideally 24/7. Finally, VDOT should reconfigure its tolling system inside the Beltway to reduce the tolls to zero whenever that segment would be free-flowing at 55 MPH.	Allen Muchnick
3/3/2023	I-66 Improvements (CE1956: I-66 and US 29 Interchange, Widen and Construct US 29 and VA 55)	Project webpage (The project map depicts downtown DC.)	Strongly disagree	I believe the \$255 Million project described at I-66 and Rte 29 in Gainesville has been completed. Any incomplete or future elements should be resubmitted as a separate new project.	

3/3/2023	Grant Avenue Road Diet		Neutral	This project is largely, if not entirely, funded and about to go to construction. If any element is not fully funded for construction, it should be resubmitted as a new, separate, re-scoped project. This project would not expand roadway capacity.	Allen Muchnick
3/13/2023	VA 123 Widening (Fairfax)	Advocacy organization	Strongly disagree	Any lane widening plan is doomed to failure from the start. The last thing needed is an extra lane for such useless endeavors. Especially when it makes the commute worse by creating an induced demand of vehicles thus creating more traffic than necessary. Northern Virginia is already polluted with enough cars and enough traffic, the last thing we need is a wider lane just for more traffic to congest it all over again. Northern Virginia requires more bike lanes, more train lines, more anything else but highway/freeway/route lane expansions. We NEED less traffic and less people in cars not more people in cars and more congestion on our roads.	
3/14/2023	VA 7, Widen, any road widening		Strongly disagree	adding additional general road travel lanes increases miles driven through induced demand. this is incompatible with making the Washington area reduce its carbon foot print and should be strongly discouraged to not make the climate problem worse	Steve Wardell

3/15/2023	VA 28 Widening, General Comment - stop widening roads. This induces more driving over time, increasing emissions and hurting the region's climate goals.		Strongly disagree	There are far too many roadway widening projects in this plan. Widening roadways induces additional driving over time, increasing emissions and moving the region further from its stated climate goals. The majority of funding should be spent on maintaining existing infrastructure and expanding climate-friendly modes of travel: public transportation and active transportation like biking and walking. Continuing to spend the majority of money on roadway widening is climate arson.	
3/15/2023	Duke Street BRT Design & Construction	Project webpage, i live in the Duke St corridor	Strongly agree	BRT projects like the one on Duke St are beneficial to climate and enable more people to travel without relying on cars. Transit and bike/ped projects like this should receive the vast majority of funding	Alex Goyette
3/16/2023	Richmond Highway Corridor Improvements	Fairfax County Alert	Strongly agree		

3/22/2023	Route 1 Improvements, CE2161	Project webpage	Disagree	Remove widening VA 123 to 6 lanes from Annapolis Way to US 1 (VP10g) from the project. Less than 20000 AADT does not warrant the high priority highway expansion. Developer can improve roadway as needed.	Mark Scheufler
3/22/2023	Rippon Boulevard Extension	Project webpage	Strongly agree	Update Project Description to future scope	Mark Scheufler
3/22/2023	Wellington Road Improvements	Project webpage	Neutral	CE3695 - Update Project Description to future scope/Combine with CE2145	Mark Scheufler

3/22/2023	Route 1 Improvements	Project webpage	Neutral	CE1942 - Update Project Description to future scope [Align with High Capacity Transit]	Mark Scheufler
3/22/2023	Route 1 Improvements	Project webpage	Neutral	CE2685 - Remove/Consolidate/Update Project Description to future scope [Align with High Capacity Transit]	Mark Scheufler
3/22/2023	Route 1 Improvements	Project webpage	Disagree	CE3180 - Update Project Description to future scope [Align with High Capacity Transit] - Project is restricted due to I-95 Express Lane Concessionaire Agreement <a href="https://p3.virginia.gov/docs/95-395_Third_ARCA_executed/95-395_Third_ARCA_(Executed).pdf">https://p3.virginia.gov/docs/95-395_Third_ARCA_executed/95-395_Third_ARCA_(Executed).pdf</a>	Mark Scheufler

3/22/2023	Catharpin Road, Widening	Project webpage	Disagree	Local Project. Project should be funded by developer/proffer as needed	Mark Scheufler
3/22/2023	McGraws Corner Drive	Project webpage	Disagree	Local Project. Project should be funded by developer/proffer as needed	Mark Scheufler
3/22/2023	Vint Hill Road Improvements	Project webpage	Disagree	Local Project. Project should be funded by developer/proffer as needed	Mark Scheufler

3/22/2023	John Marshall Widening		Disagree	CE3694 - Local Project. Project should be funded by developer/proffer as needed	Mark Scheufler
3/22/2023	Dale City Parkway Node New Through Boulevard	Project webpage	Disagree	Local Project. Project should be funded by developer/proffer as needed	Mark Scheufler
3/22/2023	Battlefield Park Bypass Project	Project webpage	Strongly disagree	Recommend Route 29 Alternate Alignment	Mark Scheufler



3/22/2023	US 15 Improvements		Neutral	CE3162 - Combine with CE1803	Mark Scheufler
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**Table 4. Virginia Project Suggestions**

	Do you have any suggested projects that should be considered for the long-range transportation plan (Visualize 2050)?	Name
2/27/2023	BRT	
3/17/2023	A POTOMAC RIVER CROSSING to connect Loudon County VA to Montgomery County MD and stop the ridiculous commute down and into the beltway and then back out west simply to get to Dulles area or points west.	Greg Visscher
3/22/2023	1. Occoquan to Neabsco Creek 3rd/4th Track Project (VPRA   TRV) - Phase 3 2. Neabsco Creek to Quantico 3rd/4th Track Project (VPRA   TRV) - Phase 3 3. Alexandria to Springfield 4th Track Project (VPRA   TRV) - Phase X 4. Franconia to Occoquan 4th Track Project (VPRA   TRV) - Phase X 5. I-95 Bi-Directional Express Lanes   Dale City to Springfield 6. I-95 Bi-Directional Express Lanes   Stafford CL to Dale City 7. North Woodbridge to Potomac Mills Fixed Guideway Study (Bus Transit/Rail) 8. US 1 Bus Rapid Transit (Woodbridge to Dumfries) 9. VA28/Old Centreville Rd Bus Rapid Transit (Manassas to Centreville) 10. VA234 Business Bus Rapid Transit 11. Route 29 Alternate (Close Route 29/Remove Battlefield Bypass) 12. I-66 Trail over Bull Run 13. Active Transportation Interstate crossings 14. 2nd Rosslyn WMATA Station 15. Fair Oak WMATA Station	Mark Scheufler

**Table 5. Multi-jurisdictional Project Suggestions**

	Do you have any suggested projects that should be considered for the long-range transportation plan (Visualize 2050)?	Name
2/27/2023	Complete all unbuilt segments of the National Capital Trail Network by 2030. Each unbuilt trail segment should be listed as a separate project.	Allen Muchnick
3/3/2023	Complete all unbuilt segments of the TPB's National Capital Trail Network by 2030. The individual trail segments could be listed as separate, standalone trail projects. For Prince William County, the key projects would include 1) the East Coast Greenway (Occoquan River to Stafford County line), 2) the I-66 Trail (Route 15 to Bull Run Rd in Fairfax County, especially the crossing of Bull Run from the east end of Balls Ford Rd [and perhaps also from Vandoor Dr]), 3) the Rte 234/Manassas Bypass Trail from Brentsville Rd to I-66/VA-29 in Gainesville, 4) all Minnieville Rd shared-use path gaps, especially north of Rte 294 (erroneously depicted as existing), 5) Shared-use path crossings of I-95 and US-1, especially at Rte 234, Rte 294, Rte 123, Dale Blvd, and Opitz Blvd, 6) Rte 29 Trail (Fairfax Co. line to Fauquier Co. line), and 7) Signal Hill Rd from Liberia Ave to Signal View Dr (also erroneously depicted as existing). The other NCTN elements in PWC would presumably be built as part of concurrent road widening projects which are of otherwise dubious value.	Allen Muchnick
3/13/2023	Cancel all highway widening projects - they will only increase car pollution and greenhouse gas emissions, making our planet hotter and deadlier. All money should be invested in electrification and public transportation, as well as making towns and cities accessible by bike and on foot.	
3/14/2023	congestion pricing projects	Steve Wardell
3/18/2023	Incentives to continue and expand telecommuting for work, medical appointments, meetings and government hearings.	Nancy Soreng

## Marcela Moreno

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**From:** Arlene Montemarano <mikarl@starpower.net>  
**Sent:** Tuesday, March 21, 2023 12:07 PM  
**Subject:** More trouble for Transurban

People are fighting back.

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<https://www.ffxnow.com/2023/03/20/mclean-residents-sue-to-stop-i-495-widening-over-environmental-impacts/>

[www.ffxnow.com](http://www.ffxnow.com)

McLean residents sue to stop I-495 widening over environmental impacts  
Mar. 20th, 2023

Construction on the 495 NEXT project has cleared land by the GW Parkway for a stormwater pond, seen on March 15, 2023 (photo by Stephen Jasak)  
(Updated at 11:55 a.m.) A group of McLean residents opposed to the extension of the I-495 toll lanes past their neighborhoods have turned to the courts in a bid to halt the project, now in its second year of construction.

The Northern Virginia (NOVA) Citizens Association filed a lawsuit with the U.S. District Court in Alexandria on Thursday (March 16) alleging that major revisions to the project design violated federal law, resulting in “significant on-going environmental harms” to residents.

**The Virginia Department of Transportation, Secretary of Transportation W. Sheppard Miller, the Federal Highway Administration (FHWA), private toll lanes operator Transurban, and Transurban subsidiary Capital Beltway Express LLC are named as defendants.**

“As a result of Defendants’ actions, NOVA and its members are experiencing **significant adverse environmental impacts** caused by the Project,” the complaint says, arguing that the **road construction and loss of trees will contribute to noise, light, air pollution, water quality, erosion and health issues.**

In the works since 2018, the I-495 Northern Extension project (495 NEXT) is adding 2.5 miles of express lanes from the Dulles Toll Road in Tysons past the George Washington Memorial Parkway in McLean, reconfiguring many of the bridges and interchanges within that span.

The GW Parkway interchange has been a particular point of concern for the NOVA Citizens Association, whose members fear that their **neighborhood along Live Oak Drive will be destroyed to accommodate planned ramps and stormwater management ponds.**

According to the complaint, **VDOT unveiled significant changes** to the project design in September 2021 and June 2022 — months after the FHWA approved its environmental assessment, an evaluation of the project’s potential impact required by the National Environmental Policy Act (NEPA).

The **changes** — including a consolidation of stormwater facilities, a narrowing of Live Oak Drive to 22

feet wide, and the relocation of an I-495 Express Lanes exit ramp to the GW Parkway — were substantial enough that **additional environmental review** should've been conducted, the association contends.

**“The major changes to the stormwater control plan, the expansion of impermeable surfaces, and the greatly expanded deforestation will result in a significant increase in the release of stormwater which is contaminated with pollutants onto the properties of members of the association,” the complaint says.**

The complaint also raises concerns about the safety of narrowing Live Oak Drive, especially for kids traveling to Cooper Middle School and the nearby Langley Swim & Tennis Club, and a reported plan to place a 5G cell tower on one resident's property.

**In a Feb. 24 declaration supporting the complaint, Live Oak Drive residents Pritesh and Marisha Patel wrote that the noise and pollution from the 495 NEXT construction has caused “irreparable harm” to their family, particularly their 11-year-old son, who has asthma.**

**“An excessive amount of dirt, dust, pollution, and particulates covers our windows and cars. The construction dust has exacerbated the allergic symptoms from which all members of our family suffer,” the Patels said, noting that they can no longer take their son outside.**

The NOVA Citizens Association is seeking a suspension of construction on 495 NEXT until the defendants “fully comply with NEPA,” along with an award covering fees related to the litigation.

VDOT said in a statement that it “places a priority on compliance with all environmental regulations and associated requirements and has proven protocols in place to ensure environmental impacts are reviewed and existing approvals affirmed throughout the lifecycle of a project.”

The department says it has worked with Capital Beltway Express, the private partner on 495 NEXT, to ensure that the project stayed in compliance with the federal approvals as the design evolved.

“VDOT is committed to providing travelers with solutions that reduce congestion, provide travel choices, improve travel reliability and enhance safety in the I-495 corridor,” VDOT said. “We remain committed to working with local communities and stakeholders, as we continue to advance those goals with the 495 NEXT project.”

Amanda Baxter, senior vice president of Transurban North America's Virginia Market and Operations, acknowledged that construction has affected the local community but maintained that the project complied with federal requirements in a statement:

"This lawsuit threatens to delay the congestion relief, environmental enhancements, and safety improvements that are vital components of Virginia's economic resilience. We recognize the impacts that construction has on the communities within our corridors. Still we are confident that the requirements to obtain approvals have been met or exceeded and we remain focused on working with our partners and communities to deliver this critical project for the region.

The complaint was filed less than a week after Transurban dropped out of Maryland's Capital Beltway toll lanes project, in part due to delayed environmental reviews and unresolved lawsuits, according to the announcement.

VDOT has said that setback won't affect 495 NEXT, though Maryland will tie the two projects together if it moves forward with the long-awaited replacement and widening of the American Legion Bridge.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

## Marcela Moreno

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**From:** Arlene Montemarano <mikarl@starpower.net>  
**Sent:** Wednesday, March 22, 2023 10:57 PM  
**Subject:** Maryland residents won when a toll-lane plan failed

Darned Tootin!. See some of what we avoided as stated below:

But we must, of course, keep our guard up lest Freddy rise again.

=====

<https://www.washingtonpost.com/opinions/2023/03/21/maryland-toll-lane-plan-transurban-failure/>

[www.washingtonpost.com](https://www.washingtonpost.com)[www.washingtonpost.com](https://www.washingtonpost.com)

Opinion Maryland residents won when a toll-lane plan failed  
Mar. 21st, 2023

**Kudos to the people of Maryland for getting Transurban to walk away. Its expensive, lopsided project would ultimately yield little to no benefit to Marylanders.**

I recently moved away from Northern Virginia, where traffic is seemingly as bad as it has ever been. A thoughtful, multifaceted plan that could include toll roads would prove far superior to the **Transurban profit-oriented model**, and it would be much **less expensive to complete through traditional governmental project financing. Tolls would be lower, and the project would not come with revenue guarantees and noncompete clauses that come with many public-private partnership contracts.**

Virginia is **locked into decades of such restrictions** with Transurban, such as **not being allowed to expand Metro's Orange Line for 10 years, little say over toll prices, and not being able to improve secondary roads to ease traffic without Transurban approval, plus state revenue subsidies if HOV riders are too numerous. This interferes with local governmental autonomy to provide for citizens and is contrary to the goals of an effective transportation program.**

I urge Marylanders to embrace this opportunity to build an effective plan for the new era. You have dodged a bullet; the real tragedy would be if Transurban returns.

Robert McGary, Glen Allen, Va.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

## Marcela Moreno

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**From:** Bill Pugh <bill@smartergrowth.net>  
**Sent:** Tuesday, March 28, 2023 10:27 AM  
**To:** TPBcomment  
**Cc:** Stewart Schwartz; Lyn Erickson  
**Subject:** Visualize 2050 comment for Virginia listening session  
**Attachments:** Visualize 2050 CSG Comments for VA Listening Session.pdf

Dear TPB staff,

Please find attached comment to transmit to Virginia TPB member agencies ahead of their Visualize 2050 listening session tomorrow.

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)  
(202) 821-3226



March 28, 2023

National Capital Region Transportation Planning Board  
Virginia Jurisdictions and Agencies

Re: **Visualize 2050 project submissions need to change to reflect adopted regional policies for climate, safety, equity, and walkable transit-friendly communities**

Dear Virginia TPB board members,

At your Wednesday, March 29 TPB working meeting and following it, the Coalition for Smarter Growth respectfully asks you to:

1. **Seriously review and revisit *all* projects that are not under construction or in final stages of design for consistency with regional policies.** The TPB staff classification of projects as “Funded/Committed//Exempt” is so overly broad that it includes many projects not completed until 2035 and beyond, or projects with only planning dollars identified or projects inactive for the foreseeable future. These projects should only be resubmitted if they are consistent with regional policy goals. This was the intent of the TPB board in 2021 calling for the current special update to the long-range plan.
2. **Remove many of the 1,000 new highway and arterial lane miles proposed in Visualize 2045, as this massive investment is not consistent with achieving regional policy goals – and ignores induced demand.** TPB, regional, and local policies overwhelmingly call for reducing car-dependence and prioritizing investments to foster walkable transit-oriented communities, increase travel demand management programs, and prioritize safety and climate goals.
3. **Package and submit for inclusion in Visualize 2050 the many identified local unmet needs for safe street improvements for walking, biking, and transit access.** While often smaller individual infrastructure improvements, these are regionally significant investment packages because they reduce driving demand and shift mode share, and deserve to be in the Visualize 2050 constrained element, as they are needed to achieve regional safety goals and adopted TPB priorities. Other regions include these in their plans, and Visualize 2045 included other types of small project groupings as well.
4. **Resubmit critical projects that invest in transit-oriented development, rail, and bus rapid transit.** Visualize 2045 included many important projects like the US Route 1 BRT, Tysons local street grid improvements, Duke Street BRT, and regional rail improvements. These types of projects need to be resubmitted and prioritized in Visualize 2050.

5. **Submit critical projects not included in the last plan, like Route 7 BRT.** The Route 7 BRT project will be transformative for multiple Northern Virginia jurisdictions and this regionally significant project needs to be included in Visualize 2050. Other important projects to include are the Capital Trail Network, including the Virginia components such as the Arlington Boulevard Trail and Mount Vernon Trail.
6. **Keep out destructive and wasteful proposed projects like new Potomac River highways crossings from Loudoun County and Prince William County into rural Maryland.** The Virginia Bi-County Parkway (also referred to as the 234 Bypass Extended) and Manassas Battlefield Bypass (also part of the old Tri-County Parkway), and various rural and suburban highway widening and new interchange projects, are inconsistent with TPB and COG policy goals and siphon funds from other higher regional and local priorities in safety, sustainability, and equity.
7. **Recognize that achieving the COG climate goals requires reducing per capita VMT by 20% in addition to rapidly adopting electric vehicles.** TPB's climate study found that our region needs to reduce per capita VMT of passenger vehicles 20% by 2030, in contrast to Visualize 2045, which would only achieve a 5% reduction by 2045. Achieving TPB's adopted greenhouse gas reduction goals last year requires even stronger action on your part. The reconfiguration of Visualize 2050 along the lines outlined above is a critical part of your needed actions in multiple sectors to achieve our climate target.

Note that the Coalition for Smarter Growth will submit to you more detailed comments on Visualize 2050 projects next month.

Thank you for your consideration.

Bill Pugh, AICP  
Senior Policy Fellow

Sonya Breehey  
Northern VA Advocacy Manager

Stewart Schwartz  
Executive Director

## Marcela Moreno

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**From:** Lindsey Mendelson <lindsey.mendelson@msierra.org>  
**Sent:** Wednesday, March 29, 2023 10:03 AM  
**To:** TPBcomment  
**Cc:** Reuben B. Collins, II; Elrich, Marc; countyexecutive@co.pg.md.us;  
countyexecutive@frederickcountymd.gov  
**Subject:** Maryland Sierra Club- Visualize 2050 comment on MD projects  
**Attachments:** MDSierraClub-TPBcomments-29Mar2023.pdf

Dear Transportation Planning Board Members, Chair Collins, County Executive Elrich, County Executive Alsobrooks, and County Executive Fitzwater,

Attached you will find Maryland Sierra Club comments related to Maryland project submissions for *Visualize 2050*.

We encourage you to include projects in *Visualize 2050* that help Maryland and the region reach its climate goals, advance equity, improve mobility, and achieve its vision of ending traffic-related fatalities and serious injuries. The region's financially constrained plan should reflect a sustainable transportation system that gives people choices—not one that perpetuates car dependency and makes it harder for people to access jobs, food, healthcare, education, and recreation. Please remove the I-495 and I-270 toll lanes project and additional highway widening projects and instead promote projects that improve and enhance public transit, equitable transit oriented-development with affordable housing, and pedestrian and cycling infrastructure.

Can you please confirm receipt of these attached comments?

Sincerely,

Lindsey Mendelson

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**Lindsey Mendelson**  
*pronouns: she/her/hers*  
**Transportation Representative**  
**Maryland Sierra Club**

PO Box 278  
Riverdale, MD 20738

**Direct Line:** 240-706-7901 (mobile)  
[lindsey.mendelson@msierra.org](mailto:lindsey.mendelson@msierra.org)

[sierraclub.org/maryland/clean-transportation](https://sierraclub.org/maryland/clean-transportation)



March 29, 2023

National Capital Region Transportation Planning Board  
777 North Capitol St NE  
Washington, DC 20002

***RE: Proposed Visualize 2050 Projects***

Dear Members of the Transportation Planning Board,

The Sierra Club Maryland Chapter urges you to include projects in the *Visualize 2050* long-range transportation plan update that help Maryland and the region reach their climate goals, advance equity, improve mobility, and achieve its vision of ending traffic-related fatalities and serious injuries. To realize the objectives, the Transportation Planning Board should include projects that improve and expand public transit, equitable transit-oriented development with affordable housing, and pedestrian and cycling infrastructure. The *Visualize 2050* should not include projects that conflict with Maryland's climate and equity goals—specifically projects that encourage auto-centric development, exacerbate sprawl, and fail to address the root causes of congestion.

Highway expansion projects within the current list of Transportation Planning Board projects run counter to the [region's new climate targets](#) and Maryland's new ambitious target to reduce greenhouse gas emissions 60% below 2006 levels by 2031, as required by the Climate Solutions Now Act of 2022. The National Capital Region Transportation Planning Board [Climate Change Mitigation Study](#) indicated that the Greater Washington region must reduce per capita driving (light duty VMT) 20% below the 2030 baseline forecast under the region's current transportation plan, ensure 50% of cars sold are EVs by 2030, and take additional actions to reduce emissions at least 50% by 2030. Vehicle Miles Travelled (VMT) per capita and total VMT were increasing prior to the COVID-19 pandemic in 2020 and have been increasing since 2021. Adding highway capacity would undermine efforts to meet our climate targets by increasing VMT.

The proposed highway expansion projects would also undermine our progress to cut air pollution. More than 85% of Marylanders live in counties that do not meet federal clean air standards for ozone, due in large part to vehicle tailpipe

emissions. The region needs to adopt a fix-it-first approach where it prioritizes maintaining its existing highway assets instead of building new ones.

Last year's TPB Chair Pamela Sebesky encouraged the TPB to better integrate climate change mitigation activities—including on-road GHG reduction goals and a set of multi-pathway reduction strategies—into the long-range transportation plan and other regional planning activities.

To be successful, Sebesky [emphasized](#) that “the collective commitment of TPB members to take action will be critical along with a consensus of member jurisdictions to adopt a set of strategies that are comprehensive and have a diverse set of actions to offer, so that every jurisdiction can take one or more actions.”

Maryland can take a significant action by removing the unwieldy and harmful I-495 and I-270 toll lane highway expansion that will lead to additional toll lane expansions and expansions of arterial roads. The TPB's 2021 Climate Change Mitigation Study showed that it will be impossible to meet 2030 and 2050 emissions reduction goals unless the most polluting projects are replaced with less polluting projects and supportive travel demand management programs (and updated assumptions for telework) and land use in the long-range transportation plan.

The I-495 & I-270 Managed Lanes project cannot be reconciled with the region's VMT and emissions reduction goals. Therefore, the Sierra Club Maryland Chapter urges you to remove the I-495 and I-270 high occupancy toll (HOT) lanes proposal in the list of projects for *Visualize 2050*. We also urge you to weigh carefully and consider removing other Maryland projects that widen or add more capacity to our roads and highways for single-occupancy vehicles beyond maintenance. Numerous [studies](#) show that adding highway capacity to reduce congestion is a false solution because it attracts more drivers and after a few years, the lanes fill up again with more traffic and congestion returns.

The I-495 and I-270 toll lanes project would expose residents and environmental justice communities located near the highways to adverse health impacts by increasing the localized air pollutants, including particulate matter pollution during the construction and operation of the toll lanes. Expanding I-495 and I-270 would also cause irreversible damage to the environment and historic and cultural resources. Graves in the Morningstar Tabernacle No. 88 Hall and Cemetery in the historic Black community of Gibson Grove in Cabin John would potentially be disturbed if the toll lanes project proceeds. In addition, the toll lanes expansion also threatens Plummers Island, a globally unique biodiversity hotspot and site of over 120 years of ongoing research.

Instead of adding HOT lanes to I-495 and I-270, we, along with multiple groups in the Maryland Advocates for Sustainable Transportation coalition, [recommend](#) the following comprehensive and integrated approach to addressing congestion in the region including:

- Implement planned Bus Rapid Transit (BRT) on MD Route 355 (which runs parallel to I-270) and on MD Route 586 (Veirs Mill Road - which facilitates east-west trips) in Montgomery County.
- Expand the MARC Brunswick Line (which runs parallel to I-270).
- Implement/increase the number of commuter buses that run on I-270 and I-495, ideally on dedicated lanes.
- Increase the frequency and reliability of all bus services in the I-495 and I-270 corridors, ideally on dedicated lanes.
- Implement more protected bike lanes and trails along roadways in the I-495 and I-270 corridors.
- Use elements of Innovative Congestion Management like ramp metering on I-495 (as is now working on lower I-270), Transportation Systems Management and Operations (TSMO) (as is being used on the Baltimore Beltway to reduce congestion), and more Transportation Demand Management (TDM) (e.g., telework, car and van pools, subsidized transit passes, etc.).
- Add more rail cars on the future Purple Line (which runs parallel to I-495) and increase frequency of service, as appropriate.
- Extend the Purple Line across the American Legion Bridge to Tysons in Northern Virginia.
- Mandate that employers above a certain size participate in sustainable commuter services programs such as Montgomery County's Fair Share for Employers Program or the Maryland Commuter Choice Program. Such mandates exist in Washington, DC, Washington State, and New Jersey.
- Turn one or possibly two one-way lanes on I-270 and possibly I-495 into reversible lanes to handle rush hour traffic.

In addition to these measures, the region should address economic and racial equity by investing in transit-oriented development within a mile of each Metro and Purple Line station in Prince George's and eastern Montgomery Counties. This would help create jobs with little or no additional VMT, reduce rush hour demand to travel from east to west on I-495 in the morning and back in the evening, and even out the flows on the inner and outer loops of I-495 during the day.

Maryland should hire independent expert(s) to undertake accurate traffic modeling on I-495 and over the American Legion Bridge, and once that data is available, undertake a study of all the alternatives (and their respective costs) to improve the bridge including: re-decking and refurbishing; and adding train, transit, bicycle, and pedestrian access.

The region's financially constrained plan should reflect a sustainable transportation system that gives people choices—not one that perpetuates car dependency and makes it harder for people to access jobs, food, healthcare, education, and recreation. Please remove the I-495 and I-270 toll lanes project and additional highway widening projects and instead promote projects that improve and enhance public transit, transit-oriented development with affordable housing, and pedestrian and cycling infrastructure.

Sincerely,

Josh Tulkin, Director  
Sierra Club Maryland Chapter

Cc:  
Chair Reuben B. Collins, II  
County Executive Marc Elrich  
County Executive Angela Alsobrooks  
County Executive Jessica Fitzwater

## Marcela Moreno

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**From:** Bill Pugh <bill@smartergrowth.net>  
**Sent:** Wednesday, March 29, 2023 10:15 AM  
**To:** TPBcomment  
**Cc:** Lyn Erickson  
**Subject:** Vis2050 comment for Maryland listening session  
**Attachments:** Visualize 2050 CSG Comments for MD Listening Session.pdf

Dear TPB staff,

Please find attached comment on Maryland Visualize 2050 project submissions to transmit to Maryland TPB member agencies ahead of their listening session tomorrow.

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)  
(202) 821-3226



March 29, 2023

National Capital Region Transportation Planning Board  
Maryland Jurisdictions and Agencies

Re: **Visualize 2050 project submissions need to change to reflect adopted regional policies for climate, safety, equity, and walkable transit-friendly communities**

Dear Maryland TPB board members,

At your Thursday, March 30 TPB working meeting and following it, the Coalition for Smarter Growth respectfully asks you to:

1. **Seriously review and revisit *all* projects that are not under construction or in final stages of design for consistency with regional policies.** The TPB staff classification of projects as “Funded/Committed//Exempt” is so overly broad that it includes many projects not completed until 2035 and beyond, or projects with only planning dollars identified or projects inactive for the foreseeable future. These projects should only be resubmitted if they are consistent with regional policy goals. This was the intent of the TPB board in 2021 calling for the current special update to the long-range plan.
2. **Remove the current MD Op Lanes project and many of the 1,000 new highway and arterial lane miles proposed in Visualize 2045, as this massive investment is not consistent with achieving regional policy goals – and ignores induced demand.** TPB, regional, and local policies overwhelmingly call for reducing car-dependence and prioritizing investments to foster walkable transit-oriented communities, increase travel demand management programs, and prioritize safety and climate goals.
3. **Package and submit for inclusion in Visualize 2050 the many identified local unmet needs for safe street improvements for walking, biking, and transit access.** While often smaller individual infrastructure improvements, these are regionally significant investment packages and deserve to be in the Visualize 2050 constrained element, as they are needed to achieve regional safety, mode shift and transit access goals and other adopted TPB priorities. Other regions include these in their plans, and Visualize 2045 included other types of small project groupings as well.
4. **Resubmit critical projects that invest in transit-oriented development, rail, and bus rapid transit.** Visualize 2045 included many important projects like Montgomery County BRT lines, Purple Line, and MARC improvements. These types of projects need to be resubmitted and prioritized in Visualize 2050.

5. **Submit critical projects not included in the last plan, like Prince George's Blue Line TOD infrastructure investments.** Maryland Transit-Oriented Development plans will be transformative for multiple jurisdictions, including reducing long Prince George's commutes on the Beltway, and their supportive infrastructure projects need to be included in Visualize 2050. Other important projects include Maryland portions of the National Capital Trail Network, bus priority treatments and rider amenities on high-ridership lines, and Southern Maryland rapid transit.
6. **Keep out destructive and wasteful proposed projects like M83 and new Potomac River highway crossings from Loudoun County and Prince William County into rural Maryland.** Various rural and suburban highway and interchange projects were rightly excluded from Visualize 2045, as they are inconsistent with TPB and COG policy goals and siphon funds from safety, sustainability, and equity priorities. These bad projects also run counter to the goals of Maryland's nationally recognized smart growth program.
7. **Recognize that achieving the COG, Montgomery, Prince George's and MD Climate Solutions Now Act greenhouse gas targets requires reducing per capita VMT by 20% in addition to rapidly adopting electric vehicles.** TPB's climate study found that our region needs to reduce per capita VMT of passenger vehicles 20% by 2030, in contrast to Visualize 2045, which would only achieve a 5% reduction by 2045. And achieving TPB's new adopted greenhouse gas reduction targets requires even stronger action on your part. The reconfiguration of Visualize 2050 along the lines outlined above is one critical part of achieving Maryland climate targets.

Note that the Coalition for Smarter Growth will submit to you more detailed comments on Visualize 2050 projects next month.

Thank you for your consideration.

Bill Pugh, AICP CTP  
Senior Policy Fellow

Carrie Kisicki  
Montgomery Advocacy Manager

Cheryl Cort  
Policy Director

Stewart Schwartz  
Executive Director

## Marcela Moreno

---

**From:** Sally Stolz <sallystolz@icloud.com>  
**Sent:** Wednesday, March 29, 2023 10:33 AM  
**To:** TPBcomment  
**Cc:** Marc Elrich; Bridget Newton; Evan Glass;  
Councilmember.Balcombe@montgomerycountymd.gov  
**Subject:** Visualize 2050 Comment on MD Projects  
**Attachments:** Remove 495270 P3 from Visualize 2050.pdf

Dear Transportation Planning Board Members and Maryland Leaders,

Please remove the I-495/I-270 Op Lanes Plan from the regional long range plan, Visualize 2050!

Reasons:

1. The Op Lanes plan locks Maryland in a Public Private Partnership (P3), like the one Virginia is locked into, which saddles taxpayers and drivers with enormous expenses for over 50 years. In addition, the non-compete clauses take away some of the rights of local jurisdictions to make and enact transportation decisions to increase safety and reduce congestion.
2. P3's have proven to be extremely risky for large projects such as this, with delays, cost overruns, and large legal expenses being the norm, as we see with Maryland's Purple Line.
3. The traffic modeling in the Op Lanes FEIS shows longer evening commutes in the general lanes if the Op Lanes were to be built than if they aren't. We are better off NOT building them.
4. The I-270 Innovative Congestion Management Project (ICMP) solved congestion on Lower I-270 with ramp metering and extension of merge lanes which has reduced bottlenecks and accidents - half at a cost of under \$150 million. This is an example of how thoughtful, smart and inexpensive changes can make a huge difference in congestion.
5. The focus of transportation investment needs to be on convenient, affordable transit, in order to:
  1. Reduce green house gas emissions
  2. Give people realistic options to leave their car at home
  3. Reduce the number of cars on roads so those who MUST drive can drive without congestion
  4. Create a much more equitable transportation system, rather than one which locks in a safer, faster trip for a few, and a less safe, slower trip for the rest.

Please remove the deeply flawed P3 Op Lanes project, which is not aligned with our regional climate goals, which is environmentally and economically irresponsible, which won't solve congestion and will make it worse for many people, and which clearly is not in the public interest.

Sincerely,  
Sally Stolz  
Co-Coordinator [DontWiden270.org](http://DontWiden270.org)  
Rockville, MD  
(301) 906-4908

Dear Transportation Planning Board Members and Maryland Leaders,

Please remove the I-495/I-270 Op Lanes Plan from the regional long range plan, Visualize 2050!

Reasons:

1. The Op Lanes plan locks Maryland in a Public Private Partnership (P3), like the one Virginia is locked into, which saddles taxpayers and drivers with enormous expenses for over 50 years. In addition, the non-compete clauses take away some of the rights of local jurisdictions to make and enact transportation decisions to increase safety and reduce congestion.
2. P3's have proven to be extremely risky for large projects such as this, with delays, cost overruns, and large legal expenses being the norm, as we see with Maryland's Purple Line.
3. The traffic modeling in the Op Lanes FEIS shows longer evening commutes in the general lanes if the Op Lanes were to be built than if they aren't. We are better off NOT building them.
4. The I-270 Innovative Congestion Management Project (ICMP) solved congestion on Lower I-270 with ramp metering and extension of merge lanes which has reduced bottlenecks and accidents - half at a cost of under \$150 million. This is an example of how thoughtful, smart and inexpensive changes can make a huge difference in congestion.
5. The focus of transportation investment needs to be on convenient, affordable transit, in order to:
  1. Reduce green house gas emissions
  2. Give people realistic options to leave their car at home
  3. Reduce the number of cars on roads so those who MUST drive can drive without congestion
  4. Create a much more equitable transportation system, rather than one which locks in a safer, faster trip for a few, and a less safe, slower trip for the rest.

Please remove the deeply flawed P3 Op Lanes project, which is not aligned with our regional climate goals, which is environmentally and economically irresponsible, which won't solve congestion and will make it worse for many people, and which clearly is not in the public interest.

Sincerely,  
Sally Stolz

Co-Coordinator [DontWiden270.org](http://DontWiden270.org)  
Rockville, MD  
(301) 906-4908

## Marcela Moreno

---

**From:** Tina Slater <slater.tina@gmail.com>  
**Sent:** Wednesday, March 29, 2023 11:27 AM  
**To:** collinsr@charlescountymd.gov; TPBcomment  
**Cc:** marc.korman@house.state.md.us; Councilmember Evan Glass;  
Councilmember.Balcombe@montgomerycountymd.gov;  
chris.conklin@montgomerycountymd.gov; Erenrich, Gary; bnewton@rockvillemd.gov;  
Weissberg, Victor  
**Subject:** Visualize 2050 comment on MD projects

Dear TPB Chair Collins:

TPB member agencies need to seriously review and revisit all projects not currently under construction or in final stages of design, not just the small number of projects that TPB staff classified as “Developmental/Non-Exempt” for zero-based budgeting.

The proposed highway and arterial capacity expansion projects in the last Visualize 2045 are inconsistent with adopted TPB and COG regional policies and Montgomery County local policies that seek to create more walkable, transit-friendly communities with less need to drive.

### **Please remove the 495/270 project from the Regional Plan**

Expanding highways attracts more drivers and also encourages drivers to live farther from their jobs because of (temporarily) reduced commute times. Mostly, expanding highways increases emissions --- something we (supposedly) want to address due to climate change.

### **Sustainable and Equitable Alternatives to Expanding 495/270**

- BRT on MD Route 355 (which runs parallel to 270)
- Expand service on MARC Brunswick Line (which runs parallel to 270)
- Purple Line will reduce East/West congestion (which runs parallel to 495)
- Reversible Lanes (using existing lanes) on 270 to handle rush hour traffic

### **Other Projects**

- Build more housing (especially affordable housing) near transit
- Invest in TOD within a mile of each Metro and Purple Line station – will help address economic and racial inequities, create jobs with very low commute times, reducing rush hour flow
- Re-deck and refurbish American Legion Bridge

Tina Slater  
Silver Spring MD

## Marcela Moreno

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**From:** Tame Coalition <tamecoalition@gmail.com>  
**Sent:** Wednesday, March 29, 2023 1:15 PM  
**To:** Marc Elrich; Erenrich, Gary; Conklin, Christopher; marilyn.balcomlbe@montgomerycountymd.gov; TPBcomment; Korman, Marc Delegate  
**Cc:** Tame Coalition  
**Subject:** Visualize 2050 TPB Meeting for Thursday, March 30, 2023

To: Transportation Planning Board of the National Capital Region

Reference: Proposed Midcounty Highway Extended/M83 or any alias name referring to M83 Highway

The TPB's Long-Range Transportation Report in June 2021 wisely eliminated the proposed Midcounty Highway Extended due to:

- [Not meeting air quality conformity requirements - R19-2021 - Inclusion of Project Submissions in the AQC Analysis for the Constrained Element of the Update to Visualize 2045 and the 2023-2026 TIP](#) (page 28, Midcounty Highway Extended is struck out);
- The Director of MCDOT, Chris Conklin, wrote to the TPB on May 13, 2021, "Montgomery County is recommending removal of Midcounty Highway Extended from Visualize 2045 update because the project is no longer the preferred recommendation to serve the northwest Montgomery County transportation needs and is not included in the Capital Improvements Program (CIP)";
- [Montgomery County Council Resolution 18-957](#) prohibits decisions-makers from using proposed Midcounty Highway Extended/M83 in future master plans for transportation planning;
- TPB adopted a strong climate goal, and Midcounty Highway Extended/M83 is not consistent with - but instead hinders our ability to meet the climate goal;
- The State of Maryland adopted a Climate Solutions Act, and Midcounty Highway Extended/M83 is not consistent with those climate goals;

- Montgomery County is working on their Climate Action Plan, and Midcounty Highway Extended/M83 is not consistent with our climate goals;
- Midcounty Highway Extended/M83 is inconsistent with - and would divert resources away from - regional { {policies on future} } transportation priorities of walkable communities and transit solutions and other ways to manage congestion and travel;

In addition, TPB should eliminate Middlebrook Road Extended Widening, (ITEM 7 – Action February 15, 2023, Visualize 2050: Technical Inputs Solicitation Approval and Plan Development Kickoff, page MD-4, row 10); due to Midcounty Highway Extended/M83 being eliminated in the TPB report in 2022.

Respectfully Submitted,

Margaret Schoap, Organizer  
240-581-0518 cell

Diane Cameron, Volunteer  
301-655-6049 cell

<http://www.tamecoalition.org/>





**Marcela Moreno**

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**From:** Arlene Montemarano <mikarl@starpower.net>  
**Sent:** Friday, March 31, 2023 11:23 PM  
**Subject:** Paperback "Privatization of Everything" Now Available

"Privatization is the transfer of control over public goods to private hands".

That about sums it up..... and why the fight against Hogan's plan to 'privatize' public roads remains so necessary. People, without realizing it, have been buying into P3's of all kinds, because the high cost of losing control is not immediately apparent.

But P3's are a trap much of the time, depending upon how they are drawn up. It looks, to some, like free money, but all that it gets us is a loss of control and loss of our freedom to innovate. Faustian as it gets.

And here's a very significant book that provides proof of why that is:

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Your support makes our work possible. Please **donate**, we'd deeply appreciate it.

## Privatization of Everything: Now in Paperback



The paperback edition of my 2021 book, **The Privatization of Everything**, is now available online at [Bookshop](#) (and other [outlets](#)) and in some bookstores. Its reappearance allows me to reflect on why we wrote the book in the first place.

If you peruse the index, you might wonder what an elementary school in Washington, D.C. has to do with the Food and Drug Administration, how our National Parks relate to parking meters in Chicago, why the history of Philadelphia's water supply is connected to fare-free transit in Kansas City, or what Jonas Salk has to do with Sallie Mae.

What they have in common is the concept of the public: public schools, public spaces, public safety, public health, public investment for a common good.

The book is an argument intended to reclaim the idea of the public and reclaim our governments as tools of the public. It is a call to use public conversation and debate to define public goods, and to ensure those public goods remain under public—democratic—control.

Apparently, that word, public, upsets some people.

There's a reason the name of former Secretary of Education Betsy DeVos turns up when discussing seemingly disparate efforts to obstruct the delivery of both covid-related healthcare services in Michigan and quality public education across the country. Turns out, they're not so disparate. You'll also find the cash of the Koch Brothers and the fingerprints of the right-wing American Legislative Exchange Council (ALEC) on legislation all over the country on issues as diverse as school privatization and environmental regulations.

The forces aligned against the public interest embrace a doctrine derived from the myth that government has no business doing anything the private sector can do and anyway "does better"—cheaper, faster, more efficiently. They do not see the potential of government as an expression of democratic will, but rather as an obstruction to the marketplace. They believe privatization—of schools, water systems, prisons, and so on—is the solution to our problems.

What is privatization? Here's how we define it in the book:

“Privatization is the transfer of control over public goods to private hands. Sometimes this happens during procurement—the outsourcing of public services to a private contractor. In other cases, it’s due to austerity—reducing public funding of a vital public good and letting private options take over. Or it can happen through deregulation—when we eliminate or fail to enforce public control through important regulatory safeguards for consumers, workers, or the environment. In all these ways, privatization is a transfer of power over our own destiny, as individuals and as a nation, to unelected, unaccountable, and inscrutable corporations and their executives.”

As we argue in the book, privatization is primarily a political strategy—one designed to separate us from public goods, our government, and each other.

And privatization is pervasive. It reaches into all corners of our lives—from the very water we drink, to the food we eat. It’s so ubiquitous, we don’t even realize it.

After I made a presentation to an organization about the book, one staff member told me she began to think differently about privatization. “I was really struck by how the invisibility and prevalence of privatization ends up undermining support for public goods.”

That’s why I hope this book will become a useful tool—a desk reference, a call to arms, a playbook, an argument to organize around, and—in the stories of those who have confronted privatization whenever it threatens a public good—an inspiration.

With the paperback version, I hope that we can make the book more affordable and the ideas more accessible to a wider audience. We hope the book can help instigate or center discussions about how to counter efforts at privatization, and how to restore faith in the possibility of government as a force for good.

In our newsletter next week, we will outline several concrete ways the book can be used—by activists, labor unions, students, teachers, elected officials, candidates—and ways we can facilitate that with presentations, bulk discounts, and more.

Donald Cohen  
Executive Director



In the Public Interest  
1305 Franklin St., Suite 501  
Oakland, CA 94612  
United States

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

--

Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract. And The Project will more than double the current square footage of impervious surface as compared to the existing eight-lane Beltway.

## Marcela Moreno

---

**From:** glsullivan@verizon.net  
**Sent:** Thursday, April 13, 2023 11:51 PM  
**To:** TPBcomment  
**Subject:** Item 1 virtual comment opportunity

Comment on buses,

Why are more and more express lanes being incorporated into major road projects? To get single drivers out of their cars use the express lanes for buses and motorcycles and bicycles only. This will improve the environment air quality and make drivers decide more traffic congestion or take public transportation. Use the bus, if you see the bus speeding by while you are in the normal lanes with everyone else maybe you will consider alternatives that will save the environment.

Gail Sullivan

## Marcela Moreno

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**From:** George Aburn <tadaburn@gmail.com>  
**Sent:** Tuesday, April 18, 2023 11:08 AM  
**To:** TPBcomment  
**Cc:** Lyn Erickson  
**Subject:** Item 1 Virtual Comment Opportunity  
**Attachments:** TPB 04123 Final Written Comment .pdf; TPB Tech Letter on New Data Final 04072023.pdf; TPB CAC Letter on New Issues and Data Final 0412023.pdf; TPB Letter 03152023 Final.pdf; TPB 031523 Final Written Comment .pdf; Letter Final to Board and MWAQC Follow Up from Nov (2).pdf

Here are comments and other documents for tomorrows TPB meeting.

Please register my comments and other documents.

I have attached my short comments and several other documents that I am requesting be made available to the Board as part of their Board packet posted on your website.

If possible, I would also request that you discuss my comments with the Chair.

Thank you again for your help with this process.

Always happy to talk - if you and Kanti decide that a quick chat may be worth it ... just let me know.

Tad  
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Comments for the April 19, 2023 TPB Meeting

Tad Aburn

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

My name is Tad Aburn. Last year I was the Chair of the MWAQC Technical Advisory Committee. 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 am now retired and commenting today as a concerned citizen.

For the past six months, I have submitted comments and letters to TPB on three major issues:

- Environmental Justice at both the local and regional level,
- Climate Change, and
- Transparency

Additional details and examples of these issues are provided in earlier comments and letters and available to TPB and its Committees from COG staff and through the TPB website ... if you are a technically savvy user.

My comment today asks TPB and its key Committees to provide a summary or a response to my earlier comments and letters on one question:

**“What is the TPB doing to address the way that regional transportation planning and projects are unintentionally creating very high-risk air pollution hot-spots in communities of color and other underserved communities.”**

There is no longer any doubt that this question is relevant. At its last meeting, MWAQC was briefed by Dr. Russell Dickerson from the University of Maryland's air pollution research group on this issue. When discussing environmental justice, Dr. Dickerson called the air pollution levels in Ivy City (an EJ area in DC) “alarming”. Significant data and analysis on this issue is available and TPB should ask the TPB Technical Committee to begin to look at this data and analyses.



In closing, I respectfully request that TPB provide a summary of plans or actions to address the question above. I would also like to ask TPB (per guidance from COG staff) to distribute the attached letters to the TPB Technical Committee and the TPB Community Advisory Committee that were prepared for their earlier April meetings to provide public input on the agenda items for those meetings. I do have concerns over this public participation/transparency policy as the TPB Committees should be able to accept public comment before their meetings ... not after the meeting and discussion have already taken place.

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April 1, 2023

Marc Rawlings  
Chair, MWCOG Transportation Planning Board (TPB) Technical Committee  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

RE: Request to Make 3 -Minute Comment at the April 7,2023 Meeting

Chairman Rawlings, members of the TPB Technical Committee:

I am writing to request a short, 3-minute opportunity to provide comment to TPB Tech on several emerging data and technical analyses issues that I believe are being overlooked.

My name is Tad Aburn. Last year I was the Chair of the MWAQC Technical Advisory Committee. 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 have considerable experience with the transportation conformity process and transportation related air pollution problems. I am now retired and commenting today as a volunteer working for several Maryland communities and as a concerned citizen.

My short comments would focus on the new data and technical analysis that is now available for key transportation issues that create air pollution and climate change. These issues could be major problems for TPB as the region moves forward with new transportation plans and Visualize 2045. These data and analyses provide new insights into how transportation is affecting environmental justice and climate change issues ... two of the highest priority environmental issues in the MWCOG region and nationally.

As you know, the federal government is actively working on revisions to its policies on environmental justice and climate change resulting from transportation projects. I know that TPB prides itself on the use of cutting edge data and getting ahead of issues that are evolving very quickly. I would encourage you to begin to look at these new data and analyses.

I understand that your agenda for the 7th may be very tight and would propose a two-step process to begin to look at and consider this new information. If possible, my 3-minute comment on the 7th could tee-up the issue for more detailed discussion at a future TPB Tech meeting. I would be willing to work with COG staff and Committee leadership to bring in experts on the emerging data and analysis.

The new data and analysis are briefly described below:

- New data and analyses on the significant role that transportation plays in creating air pollution hot-spots in communities of color/environmental justice communities is now available or becoming available. Three examples include:
  - The hyper-local air monitoring data in the Cheverly area of Prince George's County where MDE has completed analyses linking high-risk air pollution hot-spots to transportation sources and the air pollution plume from the Washington DC ozone nonattainment area,
  - The research quality data around the Ivy City area in the District that, in a recent MWAQC briefing on the science of air pollution, Dr. Russell Dickerson from the University of Maryland called the black carbon levels in Ivy City "alarming", and
  - The analytical work performed by Dr. Sacoby Wilson's University of Maryland Center for Community Engagement, Environmental Justice and Health (CEEJH) that identifies priority environmental justice areas and provides linkages to the transportation sector.
- Emerging data and analyses on greenhouse gas emissions that will be critical to the TPB process for addressing transportation emissions as part of the MWCOG regional efforts on climate change. Several examples include
  - The new data and analyses that indicate that the MWCOG climate change goals for 2030 and 2050 need to be strengthened significantly. This is critical to the selection of climate change transportation strategies as decisions to meet the current goals may not be sufficient and may be highly cost-ineffective to meet the strengthened goals now being considered. A briefing at the last CEEPC meeting began to touch upon these new data and analyses, and
  - The data that is now readily available through the transportation conformity modeling process ... this data will be critical for the region to consider as it moves forward over the next few years with updated TIPS, CLRPs and Envision 2045.

In closing, If possible, I would love to provide a quick comment (and offer to help with future TPB Tech briefings) on the 7th. Should a 3-minute comment not be possible, I

would respectfully request that a copy of this letter be distributed to the Committee and that a short synopsis of the letter be provided by TPB Tech staff on April 7th, similar to the process used at TPB meetings. I have attached several letters to TPB that are linked to the technical issues that I believe TPB Tech needs to begin to look at. I believe it is critical for TPB Tech and TPB to begin to address the issues I have raised as protecting public health is a goal shared by all members of MWCOG. That said, it is also critical for TPB and TPB Tech to get ahead of the curve on these issues as the Federal guidance and rules are now changing, and failure to get ahead of the curve could have draconian impacts on future transportation plans, regional economic development and political futures.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on these very difficult issues.

*George S. Aburn Jr.*

Tad Aburn

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Cc: TPB Tech Members  
Reuben Collins, Chair, TPB  
Anita Bonds, Chair, MWAQC  
Tom Dernoga, Maryland Vice Chair, MWAQC  
Takis Karantonis, Chair CEEPC  
Tom Ballou, Chair MWAQC TAC  
Dr. Sacoby Wilson, UMCP CEEJH  
Dr. Russell Dickerson, UMCP  
Colin Burrell, DC DOEE  
Phil Mendelson, DC Council  
Cristina Fernandez, US EPA  
Christopher Lawson, US FHWA

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April 11, 2023

Richard Wallace  
Chair, MWCOG Transportation Planning Board (TPB) Community Advisory Committee (CAC)  
MWCOG TPB CAC Members  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

RE: Request to Make 3 -Minute Comment at the April 13, 2023 Meeting

Chairman Wallace, members of the TPB CAC:

I am writing to request a short, 3-minute opportunity to provide comment during the 4/13 TPB CAC meeting on several emerging policy, data and technical analyses issues that I believe need to be looked at. These issues are important to the discussion that CAC will have as part of Agenda Items 3 and 4 during your virtual meeting on 4/13.

My name is Tad Aburn. Last year I was the Chair of the MWAQC Technical Advisory Committee. 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 have considerable experience with the transportation conformity process and transportation related air pollution problems. I am now retired and commenting today as a volunteer working for several Maryland communities and as a concerned citizen.

My short comments would focus on the policy implications of new data and technical analysis that is now available for key transportation issues that create air pollution and climate change. These issues could be major problems for TPB as the region moves forward with new transportation plans and Visualize 2045. These data and analyses provide new insights into how transportation is affecting environmental justice and climate change issues ... two of the highest priority environmental issues in the MWCOG region and nationally.

As you know, the federal government is actively working on revisions to its policies on environmental justice and climate change resulting from transportation projects. I know that TPB prides itself on the use of cutting edge data and getting ahead of issues that are evolving very quickly. I would encourage CAC to begin to look at the policy issues associated with the new data and analyses as they are critical to public health in the region and could have serious implications for future transportation plans.

I understand that your agenda for the 13th may be very tight and would propose a two-step process to begin to look at and consider this new information. If possible, my 3-minute comment on the 13th could tee-up the issues for more detailed discussion at a future TPB CAC meeting.

More detail on the new data and analysis and the policy implications are included in the two recent attached letters to TPB and TPB Tech.

In closing, If possible, I would love to provide a quick comment (and offer to help with future TPB CAC briefings) on the 13th. Should a 3-minute comment not be possible, I would respectfully request that a copy of this letter be distributed to the full Committee and that a short synopsis of the letter be provided by TPB staff on April 13th, similar to the process used at TPB meetings. I have attached several additional letters to that are linked to the key policy issues that I believe are critical to TPB and the regional transportation planning process.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on these very difficult issues.

*George S. Aburn Jr.*

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Cc: TPB CAC Members  
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Anita Bonds, Chair, MWAQC  
Tom Dernoga, Maryland Vice Chair, MWAQC  
Takis Karantonis, Chair CEEPC  
Tom Ballou, Chair MWAQC TAC  
Dr. Sacoby Wilson, UMCP CEEJH  
Dr. Russell Dickerson, UMCP

Colin Burrell, DC DOEE  
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March 15, 2023

Reuben Collins  
Chair, MWCOG Transportation Planning Board (TPB)  
Members, MWCOG TPB  
777 North Capitol St. N.E.  
Suite 300  
Washington, DC 20002

RE: Additional Information for the 03/15/2023 TPB Meeting

Chairman Collins, Board members, thank you for providing the opportunity to provide public comment for the March 15, 2023 TPB meeting. This letter is the letter containing the additional information mentioned in my short written public comments for the 03/15/2023 TPB meeting.

My name is Tad Aburn. Last year I was the Chair of the MWAQC Technical Advisory Committee. 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 am now retired and commenting today as a concerned citizen.

My comments today, again focus on two key transportation and environmental protection issues that are now critical in the Washington, DC metropolitan area ... the key roles that transportation planning has in addressing environmental justice and climate change.

The attached February 22, 2023 comments and letter to the Metropolitan Washington Air Quality Committee (MWAQC) for their February 22, 2023 meeting provide additional information on these issues.

The issues are not new issues.

At your November meeting, my comments and letter focused on a specific project, the District of Columbia's Claybrick Road Project in Prince George's County, Maryland - a poster child for government supported environmental racism. My comments and letter



on January 18th highlighted how regional transportation, air quality and land use policies are now driving unintentional racial inequity across the entire region. My February 15, 2023 comments and letter urged TPB to work through MWCOCG to update two critical transportation issues driven by climate change.

For the issues raised in November, January and February, it would be very helpful if TPB could provide an update on any activities that the Board or its members are pursuing to address those issues.

During the meeting on March 15, 2023, there will be a briefing on the environmental justice implications of Visualize 2045. The briefing concludes that Visualize 2045 does not have an adverse impact on minority populations. Because of the nature of the analysis, I believe this is an inaccurate and misleading conclusion.

The analysis focuses primarily on accessibility and mobility. It does not address the significant issue of inequitable public health and environmental risk in communities of color. It also does not address the issue of whether Visualize 2045 will begin to reverse the existing inequitable air pollution risk in minority communities linked to transportation related emissions. TPB prides itself on the use of data. The existing data on this is very clear. Minority communities are often breathing the dirtiest air in the region ... which is directly linked to transportation emissions.

The two climate change issues are:

1. The work TPB is now doing to meet current MWCOCG climate change goals (50% by 2030) may be wasteful as the region needs to update its climate change goals to be consistent with the science and the goals set by other leadership organizations. Climate change goals in the 60% reduction by 2030 ... and net-zero emissions by 2045 range ... are more consistent with the science and goals set in other leadership areas. This is particularly important to transportation planning as the strategies to meet the weaker, short-term climate change goals may not be the same as the strategies needed to meet tougher, long-term climate change goals.
2. TPB needs to include carbon dioxide (CO<sub>2</sub>) as part of the transportation conformity process required under the Clean Air Act. This will ensure that updates to the region's Transportation Improvement Plans (TIPs) and Constrained Long-Range Plans (CLRPs) are consistent with the region's climate change goals ... before those plans are adopted. The models used by TPB to complete transportation conformity analyses already produce results for CO<sub>2</sub>, so

this should not be a resource intensive task to undertake. Failure to look at CO2 and climate change as part of the transportation conformity process also appears to lack transparency.

In closing, climate change, racial equity and environmental racism will be amongst the most important issues that MWCOG and TPB will need to address over the next 10 years. I urge you to show real leadership and begin to address these difficult issues.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on these very difficult issues.

*George S. Aburn Jr.*

Tad Aburn

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Cc: TPB Members  
Dr. Sacoby Wilson, UMCP CEEJH  
Ted Dernoga, Prince George's County Council  
Colin Burrell, DC DOEE  
Hannah Ashenafi, DC DOEE  
Phil Mendelson, DC Council  
Cristina Fernandez, US EPA  
Christopher Lawson, US FHWA

Comments for the March 15, 2023 TPB Meeting

Tad Aburn

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

My comments today, again 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 DC Claybrick Road Project in PG County - a poster child for government supported environmental racism. My comments on 1/18/2023 highlighted how regional transportation/air quality/land-use policies are now driving unintentional racial inequity. My 3/15/2023 comments urged TPB to update two critical transportation issues driven by climate change ... the need for tougher, science-based climate change transportation goals and inclusion of climate change in the transportation conformity process. It would be very helpful if TPB could provide an update on the issues raised previously.

You have a briefing on your agenda today on environmental justice. The briefing concludes that Visualize 2045 does not have an adverse impact on minority populations. I believe this is an inaccurate and misleading conclusion.

The analysis focuses primarily on accessibility and mobility, not health and environmental risk. It also does not address the issue of whether Visualize 2045 will begin to reverse the inequitable air pollution risk in minority communities linked to transportation related emissions. TPB prides itself on the use of data. The existing data on this is very clear. Minority communities are often breathing the dirtiest air in the region ... which is directly linked to transportation emissions.

My comments on climate change and transportation conformity are also critical. The region could be wasting federal transportation funding to implement strategies that are driven by weaker short-term goals and not the stronger long-term goals supported by science. The transportation conformity models automatically generate CO2 data ... failure to look at CO2 seems to lack transparency.

Additional information is provided in my 3/15/2023 letter to TPB ... available in your Board packet. This letter attaches comments and a letter to MWAQC from their last meeting.

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.

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December 30, 2022

Christain Dorsey

Chair, MWCOG Board of Directors

Takis Karantonis

Chair, Metropolitan Washington Air Quality Committee (MWAQC)

777 North Capitol St. N.E.

Suite 300

Washington, DC 20002

Chairman Dorsey and Chairman Karantonis:

Thank you for providing the opportunity to submit comments for consideration at the November 9, 2022 MWCOG Board and December 7, 2022 MWAQC meetings.

I also appreciate the written and verbal responses to my comments and letters provided by the MWCOG leadership.

I am again writing today to comment on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity. I am concerned that you are focusing on the District of Columbia's Claybrick Road Project ... where the real regional issue is how regional air quality, transportation and land use policies are creating air pollution hot-spots in communities of color and how these regional policies are unintentionally promoting environmental racism throughout the Washington region. The Claybrick Road project is just one of many examples of how MWCOGs regional policies are driving environmental racism in the real world.

I have attached my December 5th letter to MWAQC that provides more detail on this issue.

I am also attaching a very short summary of the three key steps that I believe the MWCOG leadership and Committees need to begin to address to begin to fix this very serious, but technically and politically difficult problem.

During the December 7, 2022 MWAQC meeting, Chairman Karantonis described the mission of MWAQC, which is primarily to coordinate the development of regional air quality plans, and how the Claybrick Road project and environmental justice were not clearly part of the MWQAQC mission. I respectfully disagree with that. EPA is now requiring that environmental justice and real world environmental racism issues like the Claybrick Road project be addressed as part of regional air quality plans also referred to as "SIPs" or State Implementation Plans. I am surprised the MWCOG staff was not aware of this. I have cc'd Cristina Fernandez, a friend of mine and the EPA Region 3 Air Director. I am certain Cristina would be happy to brief MWAQC or MWAQC TAC on this critical new emerging area of SIP development. This issue also fits into several other EPA initiatives that are designed to ensure that environmental justice issues are addressed as part of projects that involve federal funding.

I would be happy to discuss these issues or to provide briefings to MWAQC, MWQAC TAC, CEEPC or TPB.

At a minimum, I would encourage you to ask the MWCOG staff to brief the MWCOG leadership on how widespread the issue of environmental racism, similar to the Claybrick Road Project, is throughout the region.

In closing, racial equity and environmental racism will be one of the most important issues that MWCOG will need to address over the next 10 years. I urge you to show real leadership, stop the Claybrick Road project and begin to work regionally to change the way that zoning and land use decisions are made and how existing regional air quality and transportation policies are driving racial inequity. Unfortunately, it is now well recognized that these outdated policies not only enable, but actually promote environmental racism.

Please do not hesitate to contact me. I look forward to the leadership I expect you to show on this very difficult issue.

*George S. Aburn Jr.*

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Cc: Ted Dernoga, Prince George's County Council and MWAQC member  
Koran Saines, Chair MWCOG CEEPC

Tara Failey, Chair, MWCOG AQPAC  
Roger Thunell, Chair MWAQC TAC  
Kelly Crawford, Air Director, DC DOEE  
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