



National Capital Region
Transportation Planning Board

MEMORANDUM

TO: Transportation Planning Board
FROM: Lyn Erickson, Plan Development and Coordination Program Director
SUBJECT: Public Comment for the December 2023 TPB Meeting
DATE: December 20, 2023

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

Between noon at Tuesday, November 14 at noon on Tuesday, December 19, 2023, the TPB received three comments submitted via email.

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

PUBLIC COMMENT

Bill Pugh – Comment and Letter via Email – December 6, 2023

Pugh, Senior Policy Fellow for the Coalition for Smarter Growth, provided comments they also shared with MWAQC about the pollution and health impacts from vehicle tires, brakes, and toxic road dust. CSG expressed concern that pollution from these sources could continue with increased regional VMT and greater vehicle weights from EVs. The letter also references a study from the [Imperial College of London](#) about the impact of tire particles on major organ systems.

Stewart Schwartz – Comment via Email – December 18, 2023

Schwartz, Executive Director for the Coalition for Smarter Growth, provided a comment on the importance for COG and its members to prioritize the funding of Metro for the region's housing, equity, and sustainability vision. The email also included a [press release about the "Fund Metro!"](#) coalition that 18 groups have signed into, along with the group's [Statement of Principles](#). It was asked that elected officials do more to find enough funding to avoid shifting capital money to operations.

Tad Aburn – Comments and Letters via Email – December 19, 2023

Tad Aburn, a member of a DC Environmental Justice Coalition, submitted environmental justice comments on his assessment that TPB is failing to address high-risk, localized air pollution hot-spots caused by Transportation Related Air Pollution in environmental justice communities of color across the region. Leadership from the DC EJ Coalition submitted a letter of support for Mr. Aburn's comments which attached an earlier NAACP letter on TRAP and EJ comments submitted to MWAQC. Mr. Aburn, who has commented at every TPB meeting since late 2022, believes TPBs failure to address this issue is very disappointing. He also believes TPBs lack of action is also illegal.

Addressing vehicle Non-Tailpipe pollution at COG and TPB

Bill Pugh <bill@smartergrowth.net>

Wed 12/6/2023 4:40 PM

To:TPBcomment <tpbcomment@mwkog.org>

 1 attachments (130 KB)

CSG comment to MWAQC Nov 30 2023.pdf;

Dear TPB Chair Collins and board members,

The Coalition for Smarter Growth brings to your attention the growing body of research documenting the significant pollution and suspected health impacts from vehicle tires, brakes, and toxic road dust. Our region's transition to electric vehicles will bring major air quality benefits; however, non-tailpipe pollution will continue and could grow worse as regional VMT increases and the greater weight of EVs results in 20% more tire particulate pollution. We encourage COG and TPB to bring greater awareness of this issue to their member agencies.

Please see attached comments that we gave to the Metropolitan Washington Air Quality Committee at its meeting today.

We asked COG and MWAQC to:

- Put Non-Tailpipe Vehicle Air Pollution in the FY25 work program
- Address the role of Vehicle Miles Traveled in air quality outcomes by asking for VMT performance targets at TPB and other area MPOs
- Include Non-Tailpipe vehicle pollution in their environmental justice efforts

Thank you,

Bill Pugh, AICP CTP | Senior Policy Fellow

Coalition for Smarter Growth

www.smartergrowth.net | [@betterDCregion](https://twitter.com/betterDCregion)

bill@smartergrowth.net

(202) 821-3226

November 30, 2023

Hon. Anita Bonds, Chair
Metropolitan Washington Air Quality Committee

Re: MWAQC needs to address Non-tailpipe vehicle air pollution

Dear Chair Bonds and Committee members,

The Coalition for Smarter Growth asks the Metropolitan Washington Air Quality Committee to take up the issue of non-tailpipe air pollution from cars and trucks in its work program and coordination with area transportation Metropolitan Planning Organizations (MPOs).

CSG applauds the region's air quality progress over the previous decades, reducing VOC and NOx pollution. However, mounting evidence shows that vehicle tires, brakes, and toxic roadway dust are harming human and environmental health, that these sources largely escape regulation, and that this problem will only grow worse (see this [summary](#)):

- In regions like ours that have cleaned up car and truck exhaust, PM 2.5 and PM 10 emissions from tires and brakes are greater than emissions from tailpipes.
- Tire particulate emissions from electric vehicles are 20% greater than those from similar gas/diesel-powered vehicles, due to the greater weight of EVs.
- Half to a majority of the microplastics in our waterways and oceans are from tires. For example, tire wear particles constitute half of the San Francisco Bay microplastics – so you can imagine a similar impact on the Potomac and Anacostia Rivers and Chesapeake Bay.
- The [Imperial College of London](#) found that tire wear particles likely contribute to a range of negative human health impacts across major organ systems.

Therefore, we ask MWAQC to:

1. Put Non-Tailpipe Vehicle Air Pollution in the MWAQC FY25 work program

While MWAQC's primary responsibilities are implementing federal air quality statutory requirements, it is also encouraged in its bylaws to "perform other functions to improve regional air quality, including the evaluation and consideration of innovative and non-regulatory initiatives designed to expedite or enhance attainment and maintenance of air quality goals." MWAQC is the appropriate body for regional leadership and coordination on addressing non-tailpipe air pollution from cars and trucks.

2. Address the role of Vehicle Miles Traveled (VMT) in air quality outcomes, by asking for VMT performance targets at the region's transportation MPOs

Vehicle tailpipe emissions mandates and the transition to EVs will not address non-tailpipe particulate and chemical pollution (which could grow worse with more and heavier vehicles driving more miles). Accelerating the region's shift to more sustainable modes of travel and shorter trips through land use planning and housing policy, are critical for desired health, social, environmental, and economic outcomes. **Reducing per capita VMT** is a clear performance metric for these issues – and is also critical for the MWCOG region to achieve its greenhouse gas reduction goals. TPB and other agencies across the country have found that EV adoption won't be enough in the on-road transportation sector to meet COG, local, state and federal climate goals.¹

MWAQC should recommend that TPB and other MPOs in its area such as FAMPO, adopt per capita VMT reduction targets of 20% for interim years and 25-30% by 2050.

3. Include Non-Tailpipe vehicle pollution in your environmental justice efforts

CSG appreciates the efforts of MWAQC to address disparate impacts of pollution on communities of color and low-income residents and workers. The proximity to high-volume roadways means that these communities could continue to be exposed to unacceptable levels of particulate matter and other toxins, even as our fleets shift to electric vehicles.

Note that at the September meeting of the MWCOG Climate, Energy and Environment Policy Committee (CEEPC), non-tailpipe pollution came up, and Jeff King, COG Climate, Energy & Air Director, suggested that MWAQC would be the appropriate venue to address this.

Thank you for your consideration of this timely issue.

Bill Pugh, AICP CTP
Senior Policy Fellow

CC: MWCOG Air and Climate Public Advisory Committee
MWCOG Climate, Energy and Environment Policy Committee
National Capital Region Transportation Planning Board

¹ TPB's [Climate Change Mitigation Study of 2021](#) found that a rapid shift to EVs by itself is not enough to meet COG's GHG goal. The region must reduce per capita light duty VMT by 20% by 2030 (from the pre-pandemic level), with further reductions beyond to reduce transportation emissions at the scale needed in the *MWCOG 2030 Climate and Energy Action Plan*. This level of VMT reduction is needed *on top of* the region's goal for 50% of car sales to be EVs in 2030. TPB's long-range transportation plan *Visualize 2045* would only reduce per capita passenger car VMT by a modest 5% by 2045, falling well short of the level needed to meet MWCOG GHG targets.

The State of California, which has the nation's most ambitious EV adoption programs, found that it must also achieve per capita VMT reductions of at least 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045, to meet its climate goals (CARB 2022 Scoping Plan).

18 Group Press Release re Metro Funding (& Statement of Principles)

Stewart Schwartz <stewart@smartergrowth.net>

Mon 12/18/2023 1:37 PM

To: Clark Mercer <cmercer@mwkog.org>; Kanti Srikanth <ksrikanth@mwkog.org>; TPBcomment <tpbcomment@mwkog.org>; Steve Kania <skania@mwkog.org>; Lyn Erickson <lerickson@mwkog.org>
Cc: Bill Pugh <bill@smartergrowth.net>

Clarke, Kanti, Lyn, and Steve:

Thank you for the update you shared today on the negotiated COG position on Metro funding. As I mentioned on the call, if COG and its members are committed to the Region Forward vision of a network of transit-oriented communities and all of the follow-on housing, equity, and sustainability agreements that followed, then Metro and all transit funding should be the top regional transportation funding priority. And the climate crisis demands it.

Last week, 18 groups signed onto this [press release re Metro funding](#) and released this shared [Statement of Principles](#).

You can see that we hope that our elected officials will do more to find enough funding to avoid shifting capital \$ to operations.

Please include this in your agenda packets for the COG Board, TPB and other relevant committees.

Thank you for all that you do,

Stewart

Stewart Schwartz | Executive Director

Coalition for Smarter Growth

PO Box 73282

Washington, DC 20056

www.smartergrowth.net | @betterDCregion

stewart@smartergrowth.net | @csgstewart

(703) 599-6437 (cell)

Your gift helps keep CSG's advocacy going! [Donate today!](#)

Check out our [2022 ULI Changemaker Award](#)

Item 1 Virtual Comment Opportunity

George Aburn <tadaburn@gmail.com>

Tue 12/19/2023 7:47 AM

To:TPBcomment <tpbcomment@mw cog.org>;Lyn Erickson <lerickson@mw cog.org>
Cc:kates@takomaparkmd.gov <kates@takomaparkmd.gov>;Rick Konrad <rkonrad@mw cog.org>;Fernandez.Cristina@epa.gov <fernandez.cristina@epa.gov>;Ortiz.adam@epa.gov <Ortiz.adam@epa.gov>;Welch, Angus <welch.angus@epa.gov>;Kanti Srikanth <ksrikanth@mw cog.org>;Vivek Ravichandran <vravicha@terpmail.umd.edu>

 5 attachments (407 KB)

TPB 122023 Final Written Comment Tad w DC EJC (2).pdf; TPB Letter Final Phoenix et al 12192023 Letter forwarding TA Public Comments on TRAP (2).pdf; TPB 122023 Final Written Comment Tad w DC EJC (2).pdf; NAACP.Final DDOT Letter.pdf; MWAQC Letter FinalV2 Phoenix et al 09262023 Letter on TRAP and EJ Plan .pdf;

Lyn - Please register me to provide virtual public comment during the 12/20/2023 TPB meeting.

The comments are attached.

A letter supporting my comments from leadership of the DC EJ Coalition is also attached.

Thanks again for your help

Tad

Comments for the December 20, 2023 TPB Meeting

Tad Aburn¹

DC Environmental Justice (EJ) Coalition

tadaburn@gmail.com

(443) 829-3652

Mr. Chairman, TPB members ... happy holidays ... and thank you for the opportunity to provide public comment today.

I am commenting today as a member of the DC EJ Coalition². My comments focus on TPBs continued failure to address high-risk air pollution hot-spots caused by Transportation Related Air Pollution (or TRAP) in environmental justice communities of color across the region. Leadership in the DC EJ Coalition have submitted a letter of support for my comments today, an earlier NAACP letter on TRAP and a copy of DC EJ Coalition comments submitted to MWAQC.

Since the end of 2022 I have been submitting comments on this issue. Research, studies, air monitoring and other information, demonstrating how serious this issue is, are readily available to MWAQC TAC and TPB Tech. Much of this policy relevant, analytical work has been conducted or supported by your members. DC DOEE and MDE are openly acknowledging that many communities of color are overburdened by high-risk air pollution and linking those risks to TRAP. Since the end of 2022, TPB has done nothing on this issue. Neither MWAQC TAC nor TPB Tech has even looked at the numerous studies and ongoing research on high-risk air pollution hot-spots and TRAP in the DC metropolitan area. I find this total lack of action on this very serious issue very disappointing. I believe it is also illegal.

Please use the following language in your staff summary of my comments:

“Mr. Aburn, as a member of the DC EJ Coalition, again submitted environmental justice comments on TPBs failure to address high-risk, air pollution hot-spots caused by Transportation Related Air Pollution or TRAP in environmental justice communities of color across the region. Leadership from the DC EJ Coalition submitted a letter of support for Mr. Aburn’s comments which attached an earlier NAACP letter on TRAP and EJ comments submitted to MWAQC. Mr. Aburn, who has commented at every TPB meeting since late 2022, believes TPBs failure to address this issue is very disappointing. He also believes TPBs lack of action is also illegal.”

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

² Key members of the DC EJ Coalition who are working with me on these issues include Dr. Janet A. Phoenix, MD, MPH, Chair, DC Asthma Coalition, Dr. Sacoby Wilson, University of Maryland Center for Community Engagement, Environmental Justice and Health, Parisa Norouzi, Executive Director, Empower DC, Tene Lewis, Lead Volunteer, Campaign to Reduce Lead Exposure and Asthma and William Washburn, Climate Justice Chair, Washington DC Branch, NAACP.

Thank you again for providing the opportunity for public comment.

Janet A. Phoenix, MD, MPH, Chair, DC Asthma Coalition
Parisa Norouzi, Executive Director, EMPOWER DC
Dr. Sacoby Wilson, University of Maryland Center for Community
Engagement, Environmental Justice and Health (CEEJH)
Tene Lewis, Lead Volunteer, Campaign to Reduce
Lead Exposure & Asthma
Tad Aburn

December 19, 2023

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

RE: Comments on Environmental Justice (EJ) and Transportation Related Air Pollution

Chairman Collin, TPB members:

We are writing to forward and express our support for the attached public comments being made by Tad Aburn. Mr. Aburn has been working with us as part of the DC EJ Coalition for the past 6 months.

We have begun to work with Tad Aburn on this and other issues. We support his comments and share his concern over high-risk, air pollution hot-spots in EJ communities of color. We are also concerned that TPB has made no attempt over the past year to address this very serious issue. In a briefing to MWAQC, Dr. Russell Dickerson, a national expert on air pollution, characterized the measured air pollution levels in the Ivy City EJ area as “alarming”.

Transportation Related Air Pollution (TRAP) is a high priority to our coalition. We have attached a 2022 letter describing our concerns over TRAP. We are also attaching our earlier comments on EJ to MWAQC.

In closing, should you want our input on TRAP and high-risk air pollution hot-spots in EJ communities, please contact Tad Aburn.

Thank you again for allowing public input. The work you are doing is critical.

Sincerely,

Janet A. Phoenix

Janet A. Phoenix, MD, MPH, Chair, DC Asthma Coalition

Parisa Norouzi

Parisa Norouzi, Executive Director, EMPOWER DC

Dr. Sacoby Wilson

Dr. Sacoby Wilson, University of Maryland Center for Community Engagement, Environmental Justice and Health (CEEJH)

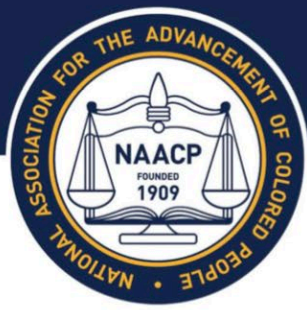
Tene Lewis

Tene Lewis, Lead Volunteer, Campaign to Reduce Lead Exposure and Asthma

George S. Aburn Jr.

George S. (Tad) Aburn Jr.

Cc: William Washburn, Climate Justice Chair, Washington DC Branch, NAACP
Kate Stewart, Chair, MWCOG BOD
Rick Conrad, MWCOG Title VI Officer
Adam Ortiz, Regional Administrator, USEPA
Cristina Fernandez, USEPA
Angus Welch, USEPA



NAACP *National Association For The Advancement Of Colored People*

Washington, DC Branch

1000 U Street, NW • Suite 100 • Washington, DC 20001

September 1, 2022

Olivia Dedner
Chief of External Affairs
District Department of Transportation (DDOT)

Dear Olivia,

I trust that this letter finds you safe & well. This is a note from Neil Boyer, Environment and Climate Justice Committee for the Washington DC branch of the NAACP. We would like to thank you for providing the opportunity to have a Zoom meeting with you and your team on July 18th. We would like to request a further meeting to follow up on the measures discussed at that meeting. We understand that your office is in the process of putting together requests for the FY 24 budget. As you know, in our previous discussions we requested that DDOT use some of the federal and local resources allocated to improve transportation infrastructure in the district to also reduce resident exposure to Traffic-Related Air Pollution (TRAP). This is critical for those areas of the city where exposure to TRAP has resulted in adverse public health outcomes, namely in residential areas adjacent to I-295, I-395, Suitland Parkway, and New York Avenue (as well as other high-volume traffic corridors located in lower-income areas of the city). We also requested active community engagement in the design and implementation of interventions funded by these resources and aimed at reducing TRAP. The Campaign team would very much like to participate as stakeholders as your agencies plan current and future budget requests that could support implementation of some of the recommendations for pollution mitigation along high traffic corridors, especially those in low-income minority neighborhoods.

In the context of the issues cited above, we were recently made aware that WMATA intends to remodel its Shepherd Parkway bus garage to include new Compressed Natural Gas (CNG) fueling infrastructure. The proposed remodel will shift many of WMATA's CNG buses to the community, contribute more fossil fuel powered traffic, result in additional TRAP, and compound adverse health impacts in Ward 8 and along the I-295 corridor. Furthermore, this project represents a troubling new foothold for fossil gas infrastructure in Ward 8 and will stymie efforts to ensure clean public transportation for DC's most vulnerable commuters and residents. Furthermore, the WMATA proposal, if implemented, would undermine its stated commitment to electrify its bus fleet and reduce its carbon footprint. This proposal is especially concerning due to its potential public health impacts on a disadvantaged community that is already disproportionately impacted by TRAP. This development further illustrates the need for greater community involvement in decisions related to TRAP and public health.

In addition, sufficient resources should be allocated to ensure that a baseline of information on TRAP-related adverse health outcomes for residents of the aforementioned communities is established as well. Such a baseline could identify the current levels of TRAP, as well as TRAP-

related morbidity and mortality rates (especially for vulnerable low-income people living close to high-traffic corridors).

In light of the above, our 'ask' is that DDOT & DOEE create a mechanism to monitor and track health outcomes associated with TRAP (e.g. respiratory disease and cardiovascular disease) especially in communities at risk adjacent to I-295, I-395 and New York Avenue. This may require coordination with DC Health as they are the agency with the expertise to assess health indicators and conduct surveillance. Under the assumption that improving public health outcomes remains a priority of the current Bowser administration, establishing this baseline is critical to provide measures of progress towards the goal of reducing harmful exposures to TRAP. This is especially important to those residents at risk in Wards 5, 7 & 8. We also strongly urge that DDOT and DOEE recommend that the District Government's representatives on the WMATA Board call for WMATA staff to suspend its proposal to locate new CNG fueling infrastructure at this Metrobus garage and consider replacing older diesel-powered Metrobuses in the garage's fleet with new electric Metrobuses instead.

Thank you in advance for your continued willingness to meet with us to discuss these important transport related public health issues. We look forward to continued collaboration on this matter and hope to hear from you at your earliest convenience.

Best Regards,


Neil Boyer

cc:

Anna Chamberlin, Associate Director, Planning and Sustainability Division,
DDOT anna.chamberlin@dc.gov

Nana Bailey, (meeting facilitator) Chief Transportation Equity & Inclusion Officer -
nana.bailey@dc.gov - DDOT

Austina Casey, Manager, Environmental Program Branch,
DDOT austina.casey@dc.gov (DDOT)

Faye Dastgheib, Interim Manager, Policy and Legislative Affairs Division, DDOT -
faye.dastgheib@dc.gov

Kelly Crawford, Associate Director Air Quality Division, DOEE
kelly.crawford@dc.gov

Kendra Wiley, Renewable Energy and Clean Transportation Policy Analyst, DOEE
Kendra.Wiley@dc.gov (DOEE)

Will Perkins - Staffer from Councilmember Janeese Lewis-George's office -
WPerkins@dccouncil.us

Michael Porcello - Staffer from Councilmember Mary Cheh's office -
mporcello@dccouncil.us

Janet A. Phoenix, MD, MPH, Chair, DC Asthma Coalition
Parisa Norouzi, Executive Director, EMPOWER DC
Dr. Sacoby Wilson, University of Maryland Center for Community
Engagement, Environmental Justice and Health (CEEJH)
William Washburn, Climate Justice Chair,
Washington DC Branch, NAACP
Tene Lewis, Lead Volunteer, Campaign to Reduce
Lead Exposure & Asthma

September 26, 2023

Anita Bonds, Chair, MWCOG Metropolitan Washington Air Quality Committee (MWAQC)
Takis Karantonis, Chair, MWCOG Climate, Energy and Environment Policy Committee (CEEPC)
Committee Members, MWAQC
Committee Members, CEEPC
777 North Capitol St. N.E.
Suite 300
Washington, DC 20002

RE: Request to Provide Input on the MWAQC/MWCOG Environmental Justice Plan

Chairwoman Bonds, Chairman Karantonis, MWAQC members, CEEPC members:

We are writing to offer our assistance to MWAQC, CEEPC and MWCOG as you work to finalize and implement the regional Environmental Justice Plan that Chairwoman Bonds proposed and passed during MWAQC's May 24, 2023 meeting. This proposal was vigorously supported by the Committee and passed unanimously. We understand that this issue may be discussed at the September 27, 2023 MWAQC and CEEPC meetings. This letter is follow-up to the comments that we submitted for the May 20, 2023 TPB meeting.

We have begun to work with Tad Aburn on this and other issues and we share his concern that it has been nearly a quarter of a year and that no real progress has been made to follow-up on Chairwoman Bond's action during the May 24th MWAQC meeting to expeditiously develop and adopt a stand-alone environmental justice plan. We find this surprising given the Committees clear charge to develop and implement the plan expeditiously.

The Plan needs to not only encourage the need to build partnerships with environmental justice communities but also include real action to reduce excessive emissions in these areas from both stationary and transportation related sources.

The data, research and analysis that is now readily available clearly shows that excess emissions in and around environmental justice areas are creating very serious, inequitable public health risks to the people and the children that live in these communities. In a briefing to MWAQC, Dr. Russell Dickerson, a national expert on air pollution, characterized the measured air pollution levels in the Ivy City environmental justice area as “alarming”.

Transportation Related Air Pollution (TRAP) is a high priority to our coalition. We have attached a 2022 letter describing our concerns over TRAP and the critical need for government agencies and regional planning organizations like MWCOG to take action to address this issue.

We have followed Mr. Aburn's efforts (before retiring, Mr. Aburn was the MDE Air Director for many years) to push MWAQC and the MWCOG Transportation Planning Board (TPB) to address the need to reduce pollution in the now well documented air pollution hotspots that are driven by TRAP and causing high risks in environmental justice communities of color. We support his efforts and share his concerns. Interestingly, Mr. Aburn's efforts started in Late 2022, almost the same time we began to push the need to address TRAP.

In closing, should you want our input on what we believe is critical in your environmental justice plan, please contact us. Please contact Tad Aburn. He will be coordinating this effort.

Thank you again for allowing public input. The work you are doing is critical.

Sincerely,

Janet A. Phoenix, MD, MPH, Chair, DC Asthma Coalition

Parisa Norouzi, Executive Director, EMPOWER DC

Dr. Sacoby Wilson, University of Maryland Center for Community Engagement,
Environmental Justice and Health (CEEJH)

William Washburn, Climate Justice Chair, Washington DC Branch, NAACP

Tene Lewis, Lead Volunteer, Campaign to Reduce Lead Exposure and Asthma

George S. (Tad) Aburn Jr., Volunteer

Cc: Kate Stewart, Chair, MWCOG BOD
Reuben Collins, Chair, TPB
Clark Mercer, Executive Director, MWCOG
Rick Conrad, MWCOG Title VI Officer
Adam Ortiz, Regional Administrator, USEPA
Cristina Fernandez, USEPA
Angus Welch, USEPA