



## MEMORANDUM

**TO:** Transportation Planning Board  
**FROM:** Lyn Erickson, Plan Development and Coordination Program Director  
**SUBJECT:** Public Comment for the March 2024 TPB Meeting  
**DATE:** March 21, 2024

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

Between noon on Tuesday, February 20 and noon on Wednesday, March 20, 2024, the TPB received ten comments submitted via email.

The comments are summarized below. All full comments are attached to this memo. It should be noted that these comments will also be included in the Visualize 2050 public comment summary which will be provided to the TPB in April.

### IN-PERSON PUBLIC COMMENT SPEAKERS

Six people signed up to speak during the Item 1 Public Comment item:

- Barbara Coufal
- Brian Ditzler
- Jason Stanford
- Sally Stolz
- Margaret Schoap
- Stewart Schwartz

### PUBLIC COMMENT

#### **Victoria Marcos Waskowitz – Comments via Letter - February 27, 2024**

Victoria Waskowicz, Chair of the Seminary Road Committee, provided comments in support of the Transportation Study Funding for Seminary Rd. (VA-420) from I-395 to George Mason Drive on behalf of the Seminary West Civic Association, co-signed by over 150 individuals.

#### **George “Tad” Aburn - Comments via Letter - March 19, 2024**

Tad Aburn submitted *comments on behalf of a DC EJ Coalition. Comments focus on the draft Envision 2050 Plan and how the visionary concepts included in the DC Council's Environmental Justice Amendments Act of 2023 need to be built into that plan. The DC Council's proposal, which was discussed during an all day hearing last Monday, is intended to begin to reverse the long-*

*standing legacy of unintentional systemic environmental racism being built into transportation plans and projects, permits and other government actions. The TPB 2050 Plan is in many ways very visionary. It unfortunately ignores the issue of high-risk air pollution hot-spots being created in environmental justice communities of color ... across the DMV ... by TPB transportation plans and projects.”*

**Cheri Conga - Comments via Email - March 19, 2024**

Cheri Conga, the Transportation and Smart Growth Program Manager provided comments on behalf of the Sierra Club Virginia Chapter. Ms. Conga provided input on the Visualize 2050 project list, which will be further detailed in the next TPB meeting when the March comment period summary is shared. Ms. Conga also noted that the TPB’s Climate Change Mitigation Study shows that the region must reduce per capita vehicle miles traveled by 20% by 2030, with further reductions by 2050, to meet MWCOG’s greenhouse gas reduction goals, which indicates that transit and accessible bike/pedestrian paths should be prioritized over highway expansions.

**Barbra Ditzler – Comments via Letter – March 19, 2024**

Ms. Barbara Ditzler, on behalf of the League of Women Voters of Maryland (LWVMD) as their lead for transportation, provided comments regarding the Visualize 2050 public comment opportunity and expressed concern and skepticism about some projects in the current public comment period that have green house gas reduction boxes checked. The LWVMD questions whether there are justifications for local governments to say that their projects are in fact reducing GHG emissions. The LWVMD further stated that we should be protecting our environment through implementing transit, bicycle, and pedestrian projects rather than roadway expansions.

**Brian Ditzler – Comments via Letter – March 19, 2024**

Mr. Brian Ditzler submitted comments on behalf of the Maryland Advocates for Sustainable Transportation. In their letter, MAST noted that the TPB has set strong GHG reduction goals in 2022 – a 50% reduction in emissions by 2030 from the 2005 level, along with a set of strategies. MAST expressed concerns that the goals and strategies are being ignored by the TPB member transportation departments by submitting highway expansion and roadway widening projects into Visualize 2050. MAST requests that the TPB pause the development of Visualize 2050 and require members to comply with the board’s updated processes that include evaluations and alternative scenarios of each project before submission into Visualize 2050. Mr. Ditzler shared comments regarding specific projects that will be shared at the April TPB meeting when the March comment period summary is shared.

**Margaret Schoap – Comments via Email – March 20, 2024**

Ms. Margaret Schoap, submitted comments on behalf of the TAME Coalition that expressed appreciation to the TPB for removing the proposed Midcounty Highway Extension from the Visualize 2045 update and for removing two final sections of the proposed Midcounty Highway Extension from Visualize 2050. The Coalition stated that the removal of this project is consistent with Montgomery County’s Climate Action Plan and the county’s Thrive 2050 plan. Further details regarding the comments on these projects will be provided at the April TPB meeting when the March comment period summary is shared.

**Rick Rybeck – Comments via Letter – March 20, 2024**

Rick Rybeck, the director of Just Economics LLC., submitted comments about how important it is that Visualize 2050 strive to reduce greenhouse gas emissions in a way that is environmentally and fiscally sustainable. Mr. Rybeck noted that Visualize 2050 should reduce the number of roadway widenings, convert existing “free” lanes to priced lanes, demand evidence-based accountability for how projects satisfy federal planning factors and TPB goals, and that the TPB should require land use changes from jurisdictions as a means for conditional project inclusion.

**Barbara Coufal – Comments via Letter – March 20, 2024**

Ms. Barbara Coufal, Chair of Citizens Against Beltway Expansion, submitted comments on behalf of the advocacy group. The letter requests that the TPB remove the Southside Express Lanes and I-495 and I-270 toll lanes from the Visualize 2050 plans as the group stated that the projects are not consistent with the TPB’s policy framework and goal of reducing greenhouse gas emissions. More details on Ms. Coufal’s and the Citizens Against Beltway Expansion’s comments regarding the projects will be shared at the April TPB meeting when the March comment period summary is shared.

**Sally Stolz – Comments via Letter – March 20, 2024**

Ms. Sally Stolz, Co-Coordinator of DontWiden270.org, provided comments that expressed concerns about the extension of Virginia’s managed lanes and Maryland’s I-495 and I-270 express lane projects. Ms. Stolz also provided a list of 7 reasons as to why they oppose the Maryland express lane projects. These more detailed comments will be included and summarized at the April TPB meeting when the March comment period summary is shared.

**Bill Pugh – Comments via Letter – March 20, 2024**

Mr. Bill Pugh, a Senior Policy Fellow with the Coalition for Smarter Growth, submitted comments stating that the Visualize 2050 Conformity Inputs do not comply with Board Resolution R19-2021. It was noted that too many proposed projects increase carbon emissions and fail to meet TPB, COG, state and local climate goals. The Coalition requests that TPB staff do an assessment of the package of projects compared to Visualize 2045 and key TPB performance measures and strategies, and that the TPB require agencies to review the results and reconsider projects before proceeding with the air quality conformity analysis. The Coalition also shared comments regarding project information and project alignment with federal planning factors and TPB priority strategies. These comments will be included at the April TPB meeting when the March comment period summary is shared.


## Seminary Road Transportation Study

Victoria Marcos Waskowicz <victoria.waskowicz@gmail.com>

Tue 2/27/2024 7:11 AM

To:TPBcomment <tpbcomment@mwkog.org>

Cc:Owen Curtis Seminary West CA <opctiger72@aol.com>;Les Jackson <ljcarguy@gmail.com>;Ron McNeely <ronm404@gmail.com>;elizabethdahouk@gmail.com <Elizabethdahouk@gmail.com>

 1 attachments (88 KB)

Seminary Road Transportation Study.pdf;

Good morning,

Please find attached a letter of support re: Transportation Study Funding for Seminary Rd. (VA-420) from I-395 to George Mason Dr.

It is from the Seminary Road Committee of the Seminary West Civic Association, co-signed by 150+ individuals in MWCOG jurisdictions and primarily within the immediate area proposed for study.

Many thanks,

Victoria Waskowicz  
Chair, Seminary Road Committee  
Seminary West Civic Association

February 27, 2024

National Capital Region Transportation Planning Board  
777 North Capitol Street NE, Suite 300  
Washington, DC 20002

**Re: Transportation Study Funding for Seminary Rd. (VA-420) from I-395 to George Mason Dr.**

Dear National Capital Region Transportation Planning Board:

Crash trends and risks are important to consider anywhere. MWCOG will have 2023 data from the City of Alexandria (data gathered in 2023 by the City, versus a study by Kimley Horn that may have key roads mixed up), and can and should determine that data's significance in a regional context. Here is why, in addition to what the data says, we believe this particular area is of regional importance in MWCOG's grant allocation decisions.

- Proximity to an interstate (I-395).
- Proximity to a large federal office complex (the Washington Headquarters Service of the US Army at Mark Center).
- Key connecting corridor between City of Alexandria and Fairfax County (this stretch is at the borders of both jurisdictions), as well as the VA Rt 7 corridor and I-395.
- High residential density: Thousands of people live in this immediate area, bookended by apartment megaplexes Southern Towers and Skyline Towers. This residential nature also leads to frequent turns, on a stretch with no turn lanes.
- Multimodal transit: As an essential traffic corridor for this neighborhood, this should be safe for drivers, pedestrians, and cyclists / scooters. It is not. Residents explicitly avoid non-vehicle transit out of safety concerns.
- Key corridor for Skyline Towers and Baileys Crossroads, despite being in City of Alexandria.
- Several bus routes go along or very nearby: Metrobus routes, including the Rt 7 bus route; Alexandria City DASH bus routes 31 and 35.
- This is a historically and currently underserved area, directly affecting the following local areas: Baileys Crossroads, Skyline, and Alexandria West.

In Northern Virginia, transit interconnectivity between jurisdictions is so important — not least because higher involvement is often needed. Individual jurisdictions are more limited in what they can do independently when areas of concern are so close to their borders.

For the sake of residents, commuters, and the transportation engineers in two separate jurisdictions who would benefit from MWCOG funding to facilitate collaboration along their borders, we ask you to weigh this grant application on the merits of both crash data and regional context.

Sincerely,

Seminary Road Committee  
Seminary West Civic Association

Committee Members:

- Victoria Waskowicz, Chair
- Owen Curtis, Seminary West Civic Association President
- Les Jackson, Seminary Park HOA President
- Ron McNeely, who has been interviewed for multiple WUSA9 articles regarding crashes into or near his property
- Elizabeth Dahouk

Plus 193 signatories of a Change.org petition, viewable at [change.org/safetyonseminary](https://change.org/safetyonseminary). Of the 169 individuals who provided a locality within MWCOG jurisdictions, their comments and then the full list are included below.

**Additional comments:**

"It is high time our City fixes the operations and safety on our primary roadway."

- Owen Curtis, Alexandria, VA

"As a seminary resident, I believe Seminary road needs a comprehensive traffic study to better inform transportation officials' decisions in formulating best ways to improve safety and ease of movements."

- Abbas Dahouk, Alexandria, VA

"Traffic is already making the local roads difficult to navigate safely, and the Kimley Horn study for the most part does not correspond to actual conditions as observed by those of us

who regularly travel on the impacted roads."

- Linda Shapiro, Alexandria, VA

"Alexandria should be a safe place for homeowners, drivers, pedestrians and cyclists to enjoy."

- George Waskowicz, Alexandria, VA

"Safety for the community."

- Annette Rodriguez, Alexandria, VA

"It needs to be done!"

- Jennifer Strand, Alexandria, VA

"I live off of Seminary Road; the transportation study and what happens will affect my daily life."

- Lynnae Henderson, Alexandria, VA

"Too much congestion on Seminary."

-Steve Warren, Arlington, VA

"The kids and homes on this road need to be safe!"

- Lorenzo Soto, Woodbridge, VA

### Signature List

<b>Name</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Signed On</b>
Aaron Alford	Alexandria	VA	22311	2/25/2024
Abbas Dahouk	Alexandria	VA	22201	2/25/2024
Aimee Child	Alexandria	VA	22304	2/26/2024

Alexandra Rodriguez	Alexandria	VA	22311	2/25/2024
Ana Wave	Alexandria	VA	22311	2/25/2024
Anne Hasson	Alexandria	VA	22311	2/25/2024
Anne Heanue	Alexandria	VA	22311	2/24/2024
Annette Rodriguez	Alexandria	VA	22314	2/24/2024
Asa Orrin-Brown	Alexandria	VA	22304	2/24/2024
Azim Vankani	Alexandria	VA	22304	2/26/2024
Barbara Harris	Alexandria	VA	22304	2/25/2024
Barbara York	Alexandria	VA	22311	2/24/2024
Blanca Mendez	Alexandria	VA	22311	2/24/2024
Catie Brownback	Alexandria	VA	22304	2/26/2024
Cecil Haithcock	Alexandria	VA	22304	2/23/2024
Charles Kramer	Alexandria	VA	22311	2/24/2024
Claire Fisher	Alexandria	VA	22311	2/24/2024



Cristina Farias-Gomez	Alexandria	VA	22311	2/25/2024
David Dexter	Alexandria	VA	22304	2/23/2024
Dawn Ramsburg	Alexandria	VA	22311	2/23/2024
Donna Kooperstein	Alexandria	VA	22311	2/24/2024
Donna Verdier	Alexandria	VA	22311	2/24/2024
Dorothy Beck	Alexandria	VA	22311	2/25/2024
Dr. Rose Ward Alston	Alexandria	VA	22314	2/25/2024
Elizabeth Dahouk	Alexandria	VA	22314	2/24/2024
Elizabeth DiGregorio	Alexandria	VA	22311	2/26/2024
Elizabeth Reeves	Alexandria	VA	22304	2/25/2024
Ellen Beste	Alexandria	VA	22302	2/25/2024
Eric Quinn	Alexandria	VA	22311	2/24/2024
Eric Santure	Alexandria	VA	22304	2/23/2024
Eric Teran	Alexandria	VA	22311	2/25/2024

Eric Waskowicz	Alexandria	VA	22301	2/23/2024
Gary Pluck	Alexandria	VA	22312	2/25/2024
George Waskowicz	Alexandria	VA	22305	2/23/2024
Gerald Furniss	Alexandria	VA	22311	2/23/2024
Gerrie Sturman	Alexandria	VA	22311	2/24/2024
Gus Ardura	Alexandria	VA	22314	2/24/2024
Ilham Hilal	Alexandria	VA	22304	2/24/2024
Ingrid Meyer	Alexandria	VA	22304	2/25/2024
Ints Silins	Alexandria	VA	22311	2/27/2024
James Allgood	Alexandria	VA	22304	2/26/2024
James Hurd	Alexandria	VA	22304	2/23/2024
James Kelley	Alexandria	VA	22311	2/25/2024
James Rose	Alexandria	VA	22304	2/24/2024
James Walterman	Alexandria	VA	22306	2/24/2024

Jennifer Mason	Alexandria	VA	22304	2/26/2024
Jennifer Strand	Alexandria	VA	22311	2/24/2024
Jeremy Turner	Alexandria	VA	22304	2/25/2024
Joanne Balzano	Alexandria	VA	22314	2/24/2024
John Carver	Alexandria	VA	22311	2/25/2024
John Shoemaker	Alexandria	VA	22311	2/24/2024
Jonathan Johnson	Alexandria	VA	22314	2/24/2024
Joseph Pukas	Alexandria	VA	22311	2/24/2024
Joshua Porto	Alexandria	VA	22311	2/23/2024
Joyce Dexter	Alexandria	VA	22311	2/24/2024
Juan Melendez	Alexandria	VA	22311	2/25/2024
Judith Howard	Alexandria	VA	22311	2/25/2024
Kate Dell	Alexandria	VA	22311	2/25/2024
Kate Rodriguez	Alexandria	VA	22304	2/26/2024

Kenneth Horner	Alexandria	VA	22311	2/23/2024
Kevin Turner	Alexandria	VA	22314	2/24/2024
Kimberly Handler	Alexandria	VA	22311	2/23/2024
Laura Gordy	Alexandria	VA	22311	2/25/2024
Lauren Trapani	Alexandria	VA	22304	2/26/2024
Leota Johnson	Alexandria	VA	22311	2/25/2024
Libby Starler	Alexandria	VA	22310	2/26/2024
Linda Mass	Alexandria	VA	22311	2/24/2024
Linda Shapiro	Alexandria	VA	22311	2/24/2024
Linda Waskowicz	Alexandria	VA	22302	2/24/2024
Lisa Cassady	Alexandria	VA	22311	2/25/2024
Lisa Chimento	Alexandria	VA	22304	2/26/2024
Lisa Schoechle	Alexandria	VA	22311	2/23/2024
Lisa Schrenk	Alexandria	VA	22312	2/24/2024

Lloyd Hough	Alexandria	VA	22311	2/26/2024
Louise Van Diepen	Alexandria	VA	22314	2/23/2024
Lucy Waskowicz	Alexandria	VA	22305	2/23/2024
Ludmilla Kasulke	Alexandria	VA	22311	2/25/2024
Lynnae Henderson	Alexandria	VA	22311	2/24/2024
Maria Porto	Alexandria	VA	22311	2/25/2024
Marilyn Bromley	Alexandria	VA	22311	2/24/2024
Mark Harrison	Alexandria	VA	22311	2/24/2024
Mary Bennett	Alexandria	VA	22311	2/26/2024
Mary doyle	Alexandria	VA	22311	2/23/2024
michael banks	Alexandria	VA	22304	2/24/2024
Michael Mass	Alexandria	VA	22311	2/24/2024
Michael Rodriguez	Alexandria	VA	22304	2/26/2024
Michael Uehlein	Alexandria	VA	22311	2/26/2024

Miguel Quintos	Alexandria	VA	22311	2/25/2024
Mitchell Fiedler	Alexandria	VA	22302	2/23/2024
Monica Lozano Caldera	Alexandria	VA	22311	2/24/2024
Monica Yudson	Alexandria	VA	22311	2/24/2024
Nancy Carver	Alexandria	VA	22304	2/25/2024
Nick Kuhn	Alexandria	VA	22304	2/23/2024
Nicole Radshaw	Alexandria	VA	22304	2/26/2024
Oliver Cole	alexandria	VA	22311	2/24/2024
Owen Curtis	Alexandria	VA	22311	2/25/2024
Pamela Zitron	Alexandria	VA	22314	2/27/2024
Patricia Clark	Alexandria	VA	22311	2/24/2024
Patricia Hopson	Alexandria	VA	22311	2/24/2024
Patricia Jack	Alexandria	VA	22311	2/25/2024
Patricia Patterson	Alexandria	VA	22311	2/25/2024

Patrick Hunnicutt	Alexandria	VA	22304	2/26/2024
Patsy Feinberg	Alexandria	VA	22304	2/25/2024
Pavlina Ryan	Alexandria	VA	22311	2/24/2024
Philip Thompson	Alexandria	VA	22304	2/25/2024
Richard Bennett	Alexandria	VA	22311	2/27/2024
RICHARD CHEW	Alexandria	VA	22311	2/25/2024
Robert Holmes	Alexandria	VA	22311	2/24/2024
Robert Kirk	Alexandria	VA	22311	2/24/2024
Robert Shoffner	Alexandria	VA	22311	2/25/2024
Roberto Sola	Alexandria	VA	22304	2/24/2024
Ron McNeely	Alexandria	VA	22311	2/23/2024
Ronald Sturman	Alexandria	VA	22311	2/25/2024
Roza Beyene	Alexandria	VA	22304	2/26/2024
Sally Hunnicutt	Alexandria	VA	22311	2/24/2024

Sam Waskowicz	Alexandria	VA	22311	2/23/2024
Sami Bourma	Alexandria	VA	22311	2/26/2024
Sara Fein	Alexandria	VA	22311	2/25/2024
Sarah Clement	Alexandria	VA	22311	2/25/2024
Sari Holmes	Alexandria	VA	22304	2/23/2024
Scott Jemison	Alexandria	VA	22311	2/24/2024
Shanne Shadel	Alexandria	VA	22311	2/25/2024
Sheila Delaney	Alexandria	VA	22311	2/24/2024
Sheila Jonas	Alexandria	VA	22311	2/24/2024
Spruce Fraser	Alexandria	VA	22302	2/26/2024
Stephen Kasulke	Alexandria	VA	22304	2/25/2024
Stephen Pickard	Alexandria	VA	22304	2/26/2024
Steve Warren	Alexandria	VA	22311	2/25/2024
Sud Banerjee	Alexandria	VA	22312	2/26/2024



Suraksha Surio	Alexandria	VA	22304	2/24/2024
Tara Heuser	Alexandria	VA	22314	2/24/2024
Terry Jemison	Alexandria	VA	22311	2/24/2024
Thomas Stefaniak	Alexandria	VA	22311	2/23/2024
Timothy Henderson	Alexandria	VA	22304	2/23/2024
Todd Ramsburg	Alexandria	VA	22311	2/26/2024
Tom Baroody	Alexandria	VA	22311	2/23/2024
Tyson Schaedel	Alexandria	VA	22314	2/26/2024
Vann Van Diepen	Alexandria	VA	22311	2/24/2024
Victoria Waskowicz	Alexandria	VA	22311	2/23/2024
Walter Reeves	Alexandria	VA	22304	2/25/2024
William Kehoe	Alexandria	VA	22311	2/25/2024
William Morales	Alexandria	VA	22311	2/25/2024
Carolyn Ikeda	Annandale	VA	22003	2/24/2024

Edward Linhart	Annandale	VA	22003	2/24/2024
Karen Late	Annandale	VA	22003	2/24/2024
Lizzy Mass	Annandale	VA	22003	2/24/2024
Brian Hires	Arlington	VA	22204	2/24/2024
Casey Boyles	Arlington	VA	22204	2/24/2024
Dale Brown	Arlington	VA	22204	2/25/2024
Gilberto Martinez	Arlington	VA	22204	2/25/2024
Leslie Hastings	Arlington	VA	22206	2/25/2024
Mark O'Brien	Arlington	VA	22206	2/23/2024
Olivia Mawhinney	Arlington	VA	22207	2/26/2024
Brikti Abraha	College Park	MD	20740	2/26/2024
Marietta Jemison	Fairfax	VA	22032	2/24/2024
Kathleen Marcos	Falls Church	VA	22042	2/23/2024
Kathryn Stockhausen	Falls Church	VA	22041	2/23/2024

Marcus Lipton	Falls Church	VA	29205	2/24/2024
Steven Shapiro	Falls Church	VA	22041	2/24/2024
Trevin Dalton	Falls Church	VA	22041	2/25/2024
Paulette Ehrenburg	Gaithersburg	MD	20882	2/26/2024
Mihai Mazilu	Herndon	VA	20171	2/24/2024
Cristina Marcos	McLean	VA	22102	2/23/2024
Gordon Janis	McLean	VA	22102	2/25/2024
Despina Timbinaris	Springfield	VA	22152	2/24/2024
Dennis Garritan	Virginia	VA	22311	2/23/2024
Renée Klish	Washington	DC	20004	2/25/2024
Scott Bushey	Washington	DC	20007	2/23/2024
Lorenzo Soto	Woodbridge	VA	22192	2/23/2024

## Item 1 Virtual Comment Opportunity

George Aburn <tadaburn@gmail.com>

Tue 3/19/2024 9:25 AM

To:TPBcomment <tpbcomment@mwkog.org>;Lyn Erickson <lerickson@mwkog.org>

Cc:chenderson@dccouncil.gov <chenderson@dccouncil.gov>;callen@dccouncil.gov <callen@dccouncil.gov>;Darden, Wesley <Wesley.Darden@montgomerycountymd.gov>;councilmember.mink@montgomerycountymd.gov

<councilmember.mink@montgomerycountymd.gov>;Jeffrey King <jking@mwkog.org>;Janet Phoenix <jphoenix@gwu.edu>;

Tene Lewis <MzTLewis616@gmail.com>;Parisa Norouzi <parisa@empowerdc.org>;William Washburn

<william.washburn1@comcast.net>

 1 attachments (72 KB)

TPB 03212024 Final Written TPB Comment Tad w DC EJC.pdf;

Lyn - Please register me to provide virtual comments during the March 21, 2024 TPB meeting. I will not be attending the meeting to provide in-person comments.

Could you also make sure that the COG staff that works with the Board receives these comments.

My comments are attached.

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

Thanks again for your help.

Tad Aburn

(443) 829-3652

Comments for the March 21, 2024 TPB Meeting

Tad Aburn<sup>1</sup>

DC Environmental Justice (EJ) Coalition

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

(443) 829-3652

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Madame Chair, Mr. Chairman, TPB members ... thank you for the opportunity to provide virtual public comment today. I am also submitting these comments to MWCOG Board Chair Allen.

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

***“I am submitting these comments on behalf of leadership at the DC EJ Coalition directly to TPB Chair Henderson and MWCOG Board Chair Allen because of the dual leadership roles they hold with MWCOG and the DC Council.***

***My comments today focus on the draft TPB Envision 2050 Plan and how the visionary concepts included in the DC Council's Environmental Justice Amendments Act of 2023 need to be built into that plan. The DC Council's proposal, which was discussed during an all day hearing last Monday, is intended to begin to reverse the long-standing legacy of unintentional systemic environmental racism being built into transportation plans and projects, permits and other government actions. The TPB 2050 Plan is in many ways very visionary. It unfortunately ignores the issue of high-risk air pollution hot-spots being created in environmental justice communities of color ... across the DMV ... by TPB transportation plans and projects.”***

In closing, I would like to request the courtesy of a response that explains how TPB will consider these comments.<sup>2</sup> I would also like to again request that TPB Tech and

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

<sup>2</sup> The TPB federally approved public participation plan says: “The TPB will give thoughtful consideration to how public input might affect its decisions and how input might improve TPB plans and products. The TPB will acknowledge the comments that were received **and how they were considered.**”

MWAQC TAC be asked by the TPB and the MWCOG Board to evaluate the comprehensive set of data, research and analyses on the issue of transportation driven air pollution hot-spots in communities of color that is now available.

Thank you again for providing the opportunity to provide public comment. I would be happy to discuss these comments with you.

## TPB Item 1 Virtual Comment Opportunity

Cheri Conca <cheri.conca@sierraclub.org>

Tue 3/19/2024 2:49 PM

To:TPBcomment <tpbcomment@mwkog.org>

Dear Transportation Planning Board Members,

The Sierra Club Virginia Chapter asks that the Transportation Planning Board (TPB) reconsider its Visualize 2050 project list and include projects that reflect regional and local climate goals, such as Route 7 bus rapid transit; and remove projects that do not align with those goals, such as highway expansions.

The TPB's Climate Change Mitigation Study shows that the region must reduce per capita vehicle miles traveled by 20% by 2030, with further reductions by 2050, in order to meet Metropolitan Washington Council of Government's greenhouse gas reduction goals, which indicates that transit and accessible bike/pedestrian paths should be prioritized over highway expansions. Independent think tank Sightline Institute notes that both academic findings and real-world experience show that new highway capacity in a metropolitan area will gradually be filled by new trips, and that congestion and stop-and-go driving will gradually increase to approximately the same level experienced prior to the highway expansion. Over the course of five decades, adding new highway lanes could lead to substantial increases in vehicle travel and CO2 emissions from cars and trucks.

Our climate is at a tipping point. Transportation agencies have a critical role in reducing greenhouse gas emissions, given that the transportation sector is the largest producer of greenhouse gases. Every effort must be made to reduce vehicle miles traveled. Transportation planning is a long-term endeavor. Expanded transit and multimodal transportation must be prioritized now.

Thanks,



**Cheri Conca**  
Transportation and Smart Growth Program Manager  
Sierra Club Virginia Chapter  
Pronouns: she/her  
703.431.4225

[opt-in to monthly news and action alerts in Northern Virginia](#)

"The most environmentally friendly product is the one you didn't buy."


—Joshua Becker

### 3.21.24 Meeting Comment

Bee Ditzler <bee.ditzler@gmail.com>

Tue 3/19/2024 4:35 PM

To:TPBcomment <tpbcomment@mwkog.org>

 1 attachments (112 KB)

3.21.23 COG comments.pdf;

Hello Chair Henderson and members of TPB,

Please add these attached comments submitted by the League of Women Voters of Maryland about Visualize 2050 and its Air Quality Conformity for the March 21 meeting. The attached is in PDF format.

Thank you,  
Barbara Ditzler  
LWVMD lead for transportation





**TESTIMONY TO THE TRANSPORTATION PLANNING BOARD,  
AIR QUALITY CONFORMITY, VISUALIZE 2050 PLAN**

**POSITION: Comments**

**BY: Linda Kohn, LWVMD President**

**Date: March 21, 2024**

The League of Women Voters of Maryland (LWVMD) appreciates that the Transportation Planning Board (TPB) has asked for comments about the Visualize 2050 Plan dealing with air quality conformity from the transportation sector. Many members have been filling out the survey form and are asking questions:

- Why are government agencies allowed to just check a box that projects may benefit our air quality and be low in greenhouse gas production?
- Where are the equity statements?
- Why are there no transit projects in the near future, but only roads?
- Is there “greenwashing” of projects?
- Are the required justifications for the project evident?

LWVMD recognizes that this Plan asks for comments earlier in its cycle than the Visualize 2045 Plan did and has a second public comment period. We do wonder however if it fills the goals of incorporating projects that might reduce greenhouse gases (GHG) in the transportation sector instead of adding to them. The LWV positions state that it should be an open and transparent process and one wonders if incorporating a project with boxes checked that a project reduces GHG, is by definition faulty. We support accountability in governments, no matter at what level. Combining government entities that incorporate three jurisdictions as TPB does should be held accountable to the people of Virginia, D.C. and Maryland for the Plan.

We should be protecting our environment through better planning and implementation of good transportation plans. Visualize 2050 is a great example of how we should envision living to improve the quality of life for everyone’s air, with emphasis being placed on transit, mobility by bike or being a pedestrian, rather than on road expansion projects. These improvements help everyone in every economic stratum and are not discriminatory dependent on their location or mode of mobility.

LWVMD values your time and attention in making this a better Visualize 2050 Plan.

## MAST written comments for TPB meeting March 21, 2024

B Ditzler <bditzler@gmail.com>

Tue 3/19/2024 10:23 PM

To:TPBcomment <tpbcomment@mwcog.org>

 1 attachments (71 KB)

MAST comments for TPB - 19March2024.pdf;

Attached please find written comments for TPB members review before the TPB meeting on Thursday.

These comments are more lengthy than what I plan to say in my oral remarks at the meeting.

Brian Ditzler



March 19, 2024

TO: National Capital Region Transportation Planning Board

RE: Visualize 2050 Air Quality Conformance Work Session on March 14, 2024

REF: TPB Board Resolution R19-2021 (adopted by TPB at its regular meeting on June 16, 2021)

These comments are submitted on behalf of MAST, Maryland Advocates for Sustainable Transportation, a coalition of more than 20 advocacy groups in our state that seek creation of a sustainable transportation system.

Several years ago, the TPB had the foresight to recognize the need to initiate a full update to its Long Range Transportation Plan process upon completion and adoption of its Visualize 2045 plan, with a target completion date of 2024 for the updated Long Range Transportation Plan. TPB Board Resolution R-19-2021 specified that the development of the new plan and future plans should include consideration of multiple build scenarios for each project and an analysis of each scenario's impact on the region's adopted goals and targets, including reduction of greenhouse gas (GHG) emissions.

Also, the development of the updated plan was supposed to be based on the concept of "zero-based budgeting" where all projects must be resubmitted for consideration during development of the 2024 and future updates to the Long Range Transportation Plan. Multiple build scenarios for each project were supposed to be evaluated to determine the best alternative to meet the region's adopted goals and targets. Projects currently under construction or currently funded were exempt from the zero-based budgeting requirement.

The TPB adopted an even stronger GHG reduction goal in 2022 -- a 50% reduction in climate-damaging GHG emissions by 2030 from the 2005 level. A set of strategies also were adopted then dealing with land use, transit, pedestrians, bicycling and electric vehicles.

Unfortunately, it seems quite obvious that TPB member transportation departments largely ignored the updated policies TPB adopted in 2021 and 2022 when deciding which projects to submit for inclusion in Visualize 2050. The new and expanded highways that are proposed would greatly increase the number of vehicles on the highways (because of induced demand) and thereby greatly increase GHG emissions. Projects that would lessen such emissions, such as expansion of transit, bike and pedestrian networks, would receive only half as much spending in the proposed Visualize 2050 plan.

Let me note here that transportation experts around the county, including Maryland DOT Secretary Weidefeld, now acknowledge the reality that highway expansion attracts more drivers so more GHG is emitted and traffic congestion occurs again in the not too distant future.

Fortunately, there is an extra year in TPB's schedule to complete Visualize 2050 before the federal timeline for completion of the air quality conformance modeling. We strongly urge this board to pause the development of Visualize 2050, and require member transportation departments to comply with TPB's updated processes that include a real evaluation of each project before deciding which ones to submit for inclusion in a new draft Visualize 2050. It makes sense that alternative scenarios (including adding more transit, more protected bike lanes, greater use of transportation demand management (TDM) and transit-oriented development (TOD), as well as other measures) should always be considered in place of adding new highway capacity to address traffic congestion. A combination of such alternatives often would be less expensive than highway expansion, reduce GHG emissions, be more equitable as they would serve more people, and cause far less damage to the environment.

Maryland DOT's proposed expansion of I-495 and I-270 that calls for the addition of two toll lanes in each direction is a good example of projects that lacked active consideration of other alternatives that would reduce traffic congestion, reduce GHG emissions, be more equitable, and cause far less other damage to the environment. Had alternatives such as expansion of the MARC Brunswick Line, adding BRT on roadways that parallel I-270, greater use of TDM and TOD, and completion of the Purple Line been considered, the proposed highway expansion would surely not have been found to be the best alternative. For these reasons, TPB should remove the I-495 and I-270 toll lane projects from the Visualize 2050 plan, or require MDOT to undertake the analysis required by TPB's updated process for evaluating projects before possible inclusion in a new Visualize 2050.

Brian E. Ditzler

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

Silver Spring, MD

301 565-0870

## TPB Item 1 Virtual Comment Opportunity

Tame Coalition <tamecoalition@gmail.com>

Wed 3/20/2024 7:08 AM

To:TPBcomment <tpbcomment@mwkog.org>

To: TPB Members

The TAME Coalition extends our appreciation to the Transportation Planning Board (TPB) for taking the following two actions:

1. Removing proposed Midcounty Highway Extended from the Visualize 2045 update, and;
2. Removing two final sections of proposed Midcounty Highway Extended from Visualize 2050:
  1. Project ID - MC12F: MD 118 Germantown Road Extended *from* MD 355 *to* M-83 Watkins Mill Road
  2. Project ID - MC14G: Middlebrook Road Ext. *from* MD 355 *to* M-83

The removal of Midcounty Highway Extended is consistent with Montgomery Climate Action Plan, and; is in alignment with Montgomery County's Thrive 2050 pledges to combat:

1. *Climate Change* by addressing air quality, water quality, flooding and drinking water supply, and biological diversity.
2. *Environmental Justice* by examining land use decisions to identify vulnerable communities that have become a receiving area for unwanted and potentially harmful land uses.
3. *Human Health* by promoting policies that reflect the research demonstrating the physical and mental health benefits of reducing air pollution and extreme heat.

Respectfully,

Margaret Schoap

Margaret Schoap, Organizer

240-581-0518 cell

Diane Cameron

301-655-6049 cell

Tim Goodfellow

301-466-9527 cell

Deborah Sarabia

240-778-5430 cell

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



## TPB Item 1 Virtual Comment Opportunity

r.rybeck@justeconomicsllc.com <r.rybeck@justeconomicsllc.com>

Wed 3/20/2024 9:17 AM

To:TPBcomment <tpbcomment@mwkog.org>

Cc:Henderson, Christina (Council) <chenderson@dccouncil.us>;John Swanson <jswanson@mwkog.org>;Kanti Srikanth <ksrikanth@mwkog.org>;Lyn Erickson <lerickson@mwkog.org>

 1 attachments (735 KB)

Visualize 2050 - Air Qual Conf - Just Econ Comment 24-03-21.pdf;

Dear TPB Board and Staff,

I am Rick Rybeck, director of Just Economics LLC. I cannot attend today's meeting in person. Therefore, I am submitting my public comment electronically via e-mail. See the attached file.

Thank you for considering my views. Please let me know if you have any questions or concerns.

Regards,

Rick Rybeck, Director

[r.rybeck@justeconomicsllc.com](mailto:r.rybeck@justeconomicsllc.com)

**Just Economics** 

**Just Economics LLC**

1669 Columbia Rd., NW, Suite 116

Washington, DC 20009-3625

202-439-4176

<https://justeconomicsllc.com>

**Prosperity | Sustainability | Equity**



**TRANSPORTATION PLANNING BOARD MEETING**  
**March 21, 2024**

Item 1 Virtual Comment Opportunity

**VISUALIZE 2050**  
**AIR QUALITY CONFORMITY**



I am Rick Rybeck, director of Just Economics LLC. I cannot attend today's meeting in person. Therefore, I am submitting my public comment electronically via e-mail.

At today's meeting, the Board will be briefed about project updates for and public comments about the upcoming iteration of the Constrained Long Range Plan (CLRP), referred to as "Visualize 2050." Unfortunately, Visualize 2050 is not sufficiently visionary to meet the critical imperative to substantially reduce greenhouse gas (GHG) emissions. This primarily "business as usual" approach will doom the region to environmental degradation, health impairments, loss of life and fiscal bankruptcy.

#### **SUMMARY:**

In order to meet the critical demands of environmental and fiscal sustainability, Visualize 2050 must:

- Reduce the number of roadway widenings;
- Convert existing "free" lanes to priced lanes;
- Demand more rigorous, evidence-based accountability for CLRP project justifications in terms of how they satisfy federal planning factors and TPB Goals;
- As a condition for infrastructure project inclusion in the CLRP, the TPB must require:
  - Significant reform of zoning and other development regulations by member jurisdictions; and
  - Reduction or elimination of financial incentives for sprawl development.

#### **BACKGROUND:**

MWCOG and TPB Board members have been informed about the environmental crisis facing the region, the country and the world. MWCOG and TPB have adopted stirring "vision" documents with aspirational goals. Unfortunately, the nuts-and-bolts planning documents that will facilitate future infrastructure investments fail to live up to these laudatory goals and aspirations. Although Visualize 2050 purports to adopt a "zero-based budget" approach to the CLRP, and although a few projects from prior CLRPs have been abandoned, the **changes are not sufficient to meet the substantial GHG reductions necessary to safeguard the environment upon which our economic, social and biological survival depend.**

The primary driver for environmental degradation and unsustainable infrastructure spending is urban sprawl. Sprawl is not inevitable and it is not the result of "free market" choices. Sprawl results from prior infrastructure investments, infrastructure operations, development regulations (including zoning) and financial incentives embedded in federal, state and local tax codes.

Visualize 2050 does not materially change over-reliance upon private vehicles for regional transportation. Although roadway pricing has been proven effective in reducing traffic congestion and pollution, the region's approach is primarily confined to adding new tolled lanes to existing roads rather than converting existing free lanes to priced lanes.

But even if roadway widenings were eliminated from the infrastructure investment inputs, they would not be sufficient to accomplish sprawl reduction. Effective, sustainable and equitable integration of transportation infrastructure with nearby land use can only be accomplished through commitments to zoning and tax reform. The region's support for infrastructure investments in the CLRP must be conditioned upon the implementation of these reforms.


Thank you for considering these remarks. Please let me know if you have any questions or concerns.

## TPB Item 1 In-Person Comment Opportunity

bcoufal10@aol.com <bcoufal10@aol.com>

Wed 3/20/2024 11:07 AM

To:TPBcomment <tpbcomment@mwkog.org>

 1 attachments (99 KB)

TPB final letter re Visualize 2050.docx;

On behalf of Citizens Against Beltway Expansion, I will be attending the TPB meeting in-person tomorrow to speak about Visualize 2050. Please find attached our letter to the TPB regarding our major concerns about the Visualize 2050 project list.

Sincerely,  
Barbara Coufal, Chair  
Citizens Against Beltway Expansion



March 20, 2024

Transportation Planning Board  
777 North Capitol St. NE  
Washington, DC 20002-4239

Dear Chair Henderson and Transportation Planning Board Members:

I am writing about Visualize 2050 on behalf of Citizens Against Beltway Expansion. For the reasons highlighted below, we urge the Transportation Planning Board (TPB) to remove the Southside Express Lanes project and the toll lanes on I-495 and I-270 from the Visualize 2050 plan.

- These highway expansions are not consistent with TPB's framework and goal of reducing greenhouse gas emissions.
- The highway expansions are not consistent with TPB's policy requiring consideration of multiple build scenarios.
- Southside Express Lanes would crowd out a future extension of Metro's Blue Line over the Woodrow Wilson Bridge.
- Toll lanes do not resolve congestion, they only move the bottlenecks.
- An abbreviated environmental review of the Southside Express Lanes denies the public a full understanding of its harmful impacts.

**These highway expansions are not consistent with TPB's policy framework and goal of reducing greenhouse gas emissions.** In 2021, the TPB adopted a resolution to develop future plans that included analyses of a project's impact on the region's goal to reduce greenhouse gas (GHG) emissions. Yet, sponsors of the Southside Express Lanes and the I-495 and I-270 toll lanes failed to provide analyses of how the project would impact these emissions.

The TPB adopted greenhouse gas emissions targets in 2022, including a 50% reduction in GHG emissions by 2030 from 2005 levels. Including megaprojects to expand these highways in the final Visualize 2050 would not be consistent with the TPB's emissions targets and would demonstrate that the TPB is not willing to take the steps needed to address global warming.

**The highway expansions are not consistent with TPB's policy requiring consideration of multiple build scenarios.** During its presentations on the Southside Express Lanes, the Virginia Dept. of Transportation (VDOT) claimed to be considering alternatives to extending toll lanes. But these alternatives are mere window dressing, rather than a serious study of options. The stated purpose of the study is to "extend and provide continuity of the Express Lanes system" and one of the selection criteria is "system continuity" of the Express Lanes. The

narrowly drawn purpose and selection criteria precludes all other alternatives. A more honest approach would allow for the actual study of alternatives for moving people and reducing congestion.

Similarly, for its I-495/I-270 project, the Maryland Dept. of Transportation (MDOT) also employed a circumscribed purpose and needs statement and failed to consider alternatives that did not involve construction of highway lanes through a public-private partnership.

**Southside Express Lanes would crowd out a future extension of Metro's Blue Line over the Woodrow Wilson Bridge.** When it was rebuilt, policymakers ensured that there would be space to build rail transit over the Woodrow Wilson Bridge and WMATA is studying a plan to extend the Blue Line over the Bridge and into Prince George's County. VDOT claims that if WMATA's plan to extend the Blue Line is developed, two of the Southside Express lanes would be converted for use by the Blue Line. This claim is not credible. It would be enormously expensive for Virginia to compensate Transurban for the long-term reduction in toll revenues caused by the loss of two toll lanes and competition from the Blue Line. As a consequence, we can expect Virginia to use its veto to block the Blue Line extension and preserve all of the toll lanes on the Woodrow Wilson Bridge.

**Toll lanes do not resolve congestion, they only move the bottlenecks.** Adding toll lanes to these highways will not solve congestion. In their November 2021 [comments](#) on the Supplemental Draft Environmental Impact Statement for the I-495/I-270 project, the Maryland-National Capital Park and Planning Commission stated on page 8, "The Preferred Alternative does not eliminate congestion in the corridors studied but and [sic] instead shifts it from the vicinity of the ALB (e.g., McLean and Potomac) to other areas in Maryland."

The failure of toll lanes to resolve congestion is echoed in a December 2021 *Washington Post* [interview](#) of Transurban's then-leader for North America, Pierce Coffee. In the interview, Coffee acknowledges an inherent defect of toll lanes; they create congestion when toll lanes end and traffic merges into general lanes. In the case of the Southside Express Lanes, the project would move a bottleneck in Springfield, VA to Oxon Hill, MD, increasing traffic congestion and air pollution in the Oxon Hill area.

**An abbreviated environmental review of the Southside Express Lanes denies the public a full understanding of its harmful impacts.** VDOT is not conducting a full environmental impact statement. Instead, it is conducting a less comprehensive environmental assessment. As a result, the public will not know the full impacts of the toll lanes on the environment and communities near the Southside Express Lanes. This is especially troubling given that the stretch of toll lanes through Prince George's County is straddled by environmental justice communities which are being denied a sufficient opportunity to understand the full impacts of the project and provide feedback on them.

We urge the TPB to act on its mandate to reduce greenhouse gas emissions and promote alternatives to highway expansions by removing the Southside Express lanes and toll lanes on I-495 and I-270 in Montgomery County from Visualize 2050.

Sincerely,


Barbara Coufal, Chair  
Citizens Against Beltway Expansion

## TPB Item 1 Virtual Comment Opportunity

Sally Stolz <sallystolz@aol.com>

Wed 3/20/2024 11:56 AM

To:TPBcomment <tpbcomment@mwkog.org>

 1 attachments (105 KB)

Request TPB remove 495270 toll road from long-range plan.pdf;

Dear Chair Henderson and TPB members,

Please consider these comments in your discussion tomorrow regarding Visualize 2050.

Sincerely,

Sally Stolz

(301)906-4908

March 21, 2024

TPB Item 1/ Virtual Comment Opportunity

Dear Chair Henderson and TPB Members,

The Visualize 2050 plan for extending Virginia's managed lanes into Maryland over the American Legion Bridge, would create misery. The plan is inequitable, discriminatory, will actually create congestion for drivers in the general lanes, will increase greenhouse gas emissions and promote auto dependency, will destroy neighborhoods and thousands of acres of parkland and green space, and force desperate drivers to pay astronomical tolls.

The Visualize 2050 express lanes for Maryland's I-495 and I-270, if built according to the existing plan, will create congestion by removing the HOV-2 lanes on I-270, which are only HOV for 15 hours a week. So 91% of the time they are general lanes. They will be gone. And South of Falls Road, where there are currently 7 lanes on each side, it removes the two HOV-2 lanes plus two more lanes. This WILL create congestion. This is intentional. The plan needs to create congestion to force drivers onto the expensive toll lanes.

This cruel plan is unconscionable and you can stop it. There is no need to create this misery. We can do much better.

Another fact that most people don't know is that MDOT's current design for the toll lanes makes it impossible to enter or exit the toll lanes directly to or from the general lanes.

In MDOT's plan for I-270 and I-495, if you're in the general lanes and all of a sudden the traffic slows for an accident, the only way to get into the toll lanes is to exit the highway and drive through local roads until you find an entrance to the toll road. Now imagine what the local roads will be like if everyone decides to do that.

Conversely, the only way to exit the toll lanes is to exit the highway altogether and drive on local roads until you get to the next entrance ramp for the general lanes. This crazy design will not only create havoc on local roads, but will effectively lock some people into the toll lanes, forcing them

to unwittingly spend even more money on tolls. If this cruel and crazy plan is not stopped by the TPB, it may be impossible to stop.

But it desperately needs to be stopped. A 12 mile trip from Rockville to Tyson's would cost \$50 because the maximum toll in 2026, for example, would be over \$5 per mile. That is the peak congestion charge, but of course that is precisely when one might want to escape congestion and use the toll lanes. Considering how hard it will be to switch from the general to the toll lanes, it's doubtful many will use the toll lanes on an impromptu, desperate-situation basis, such as an accident. The local roads will be too backed up for them to even get to the toll road entrance. Instead, the toll lanes will be used regularly by wealthy people who don't care what the toll is. It will effectively be their private road. This is one reason why it is so inequitable.

This project must be stopped. For five years MDOT and then Comptroller Franchot were bombarded with messages to stop this terrible project. Messages from our top local leaders who have solid plans for reducing congestion on I-270 and I-495, down to thousands of informed citizens who through research and consultation with traffic modeling and many other experts, quickly saw the destruction and futility of this project.

But Gov. Hogan and MDOT, largely ignored public opposition since 2018, making only temporary changes. Now Gov. Moore seems to be reluctantly going along with it despite his promise to "leave no-one behind." The original goal of tolling the entire Maryland beltway with exorbitant tolls appears to be the same. And unless the TPB stops this terrible project now, we may be sentenced to this cruel combination of increased congestion, increased GHGs, and astronomical tolls - on top of all the destruction.

Please, do the right thing. Send MDOT back to the drawing board to work with our local governments for the RIGHT plan.

Very Sincerely,  
Sally Stolz

Co-Coordinator of [DontWiden270.org](http://DontWiden270.org) (please visit our website for much more information and links to resources.) which will submit its own comments with documentation very soon.

5 Lochness Court  
Rockville, MD 20850



(301)906-4908

## **Supplemental Attachment Sally Stolz**

Along with thousands of others and nearly ALL of Montgomery County and Prince Georges County Elected Officials, I oppose this project. Here are some of my reasons:

### **1. It is a very inequitable plan and will CREATE congestion in the general lanes.**

a. User fees such as tolls are a regressive tax. Middle and lower income drivers will rarely if ever get to use the express lanes because the tolls are a much higher percent of their income, making them unaffordable.

b. It makes the bottleneck on northbound I-270 worse, as it would have 7 lanes feeding into two.

c. It creates a new bottleneck where the new toll lanes would feed into the unchanged I-495 lanes.

d. It makes the lanes which remain "free" much more congested than they are now because:

e. It removes the HOV lanes, which are only HOV 15 hours a week (ex. Northbound HOV lane is only HOV 3:30-6:30 M-F. The rest of the time they function as general purpose lanes.) So in effect, 91% of the time, there will be one less general lane.

f. More congestion leads to more accidents which lead to more congestion.....

g. Only very wealthy commuters will be able to use the toll lanes regularly, as rush hour tolls will be well over \$2/mile!

h. Trucks will use the general lanes, as research shows they avoid tolls. This makes the general lanes less safe!

i. Additional accidents due to trucks will FURTHER congest the general lanes.

j. Carpooling will be reduced, adding to congestion. The HOT lanes will get less HOV users than our current HOV lanes because:

-It is more difficult to find 2 extra riders for HOV-3 than 1 extra rider for HOV-2

-Access to the HOT lanes will be limited, adding further commuting time just to get on them.

-Currently drivers can get into the HOV lane as soon as they get on, wherever they get on. That will end.

### **2. It is bad for the environment and bad for our health.**

a. It promotes use of Greenhouse gas emitting autos rather than mass transit, teleworking, biking.

b. The health of thousands of people living, working, being educated and playing sports near I-270 will be endangered.

c. It will create serious stormwater runoff problems - both environmental and financial.

d. It will destroy well-established green buffers, which add beauty, help clean the air and reduce noise.

### **3. It is truly disastrous for the City of Rockville.**

a. Traffic will be increased through Rockville city streets as people make their way to and from the new toll road entrances.

b. The city will bear huge expenses for mitigating increased traffic and new traffic patterns

c. The city will bear huge expense upgrading the stormwater management system to handle more runoff.

d. The local streams our children play in will be more polluted from construction runoff and stormwater runoff.

e. The 5+ years of construction will make getting from the side west of 270 to the side east of it slow and hazardous.

f. The 5+ years of construction will add noise, silica dust and other health and sleep-jeopardizing pollution to Rockville, Gaithersburg, Bethesda and Potomac citizens living near I-270.

g. The County Court system and businesses in downtown Rockville and Rockville Pike will be disrupted, as people will have difficulty getting to them during the 5+ years of construction.

h. Many residences will lose parts of their backyards, according to MDOT's maps. In some cases this would make their backyards unusable and homes unlivable. And the Limits of Disturbance shown by MDOT may be underestimated.

**4. It will open the door for Transurban, the lead P3 company MDOT selected, which backed out due to a "changed political environment" to return and create new bottlenecks,** and then convince MDOT to sign more contracts to relieve the bottlenecks by widening I-495 as they originally planned. They have done this in Virginia and Australia. This is their business model. They are patient. Letting them build the toll road on I-270 is **like letting the proverbial camel's nose under the tent.**

**5. Building with a P3 is more expensive in the long run.** Not only would toll revenue which could be going to the state of Maryland, go to private investors, but for 50 years Transurban would have control over local decisions for I-270 and roads near it, due to non-compete clauses buried in the voluminous contracts. They would prevent helpful changes

**6. Putting this "highway within a highway" down the middle of I-270 is opposed by nearly all the local elected officials in Montgomery and Prince Georges Counties,** from the Mayor and City Council of Rockville to the Montgomery County Executive, to the President and entire Montgomery County Council, to the Mayor of College Park and many other mayors in Prince Georges County, to the entire District 17 state delegation (Rockville and Gaithersburg) and many other state legislators, and on

and on. There is much opposition in Frederick County now, too, as people are becoming aware of the projected cost of the tollroad and the increased congestion in the free lanes.

**6. It is the opposite of what we should do to tackle Climate Change.**

**7. Montgomery County has much more equitable solutions for traffic relief on I-270, which are also less destructive, less expensive and more climate-friendly.** Solving the bottleneck in the northbound lanes of I-270 **north of I-370** must come first. Other traffic relief measures are reversible lanes, incentivizing the continuation of teleworking (if needed) and providing more mass transit options, such as more MARC train service, dedicated bus lanes, and more.

**8. If the American Legion Bridge is to be widened, it should include enough space and support for rail.** Our long-term regional plan should connect the entire metropolitan region with efficient, environmentally friendly rail. **And Maryland should finance it traditionally, with help from the federal government. If there are to be tolls, they should be controlled and reaped by the taxpayers, not a private company.**

**THANK YOU very much for reading all these reasons for the Transportation Planning Board to keep MDOT's ill-conceived P3 proposal out of Visualize 2045..**

**Very Sincerely,  
Sally Stolz**

**Co-Coordinator of [DontWiden270.org](http://DontWiden270.org) (please visit our website for much more information and links to resources.)**


**5 Lochness Court  
Rockville, MD 20850  
(301)906-4908**

## TPB Item one written comment for board

Bill Pugh <bill@smartergrowth.net>

Wed 3/20/2024 12:01 PM

To:TPBcomment <tpbcomment@mwkog.org>

 1 attachments (147 KB)

TPB Visualize 2050 board comment March 2024.pdf;

Dear TPB staff, please see attached comment for the board at tomorrow's meeting. 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 20, 2024

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

**Re: Visualize 2050 Conformity Inputs do not comply with Board Resolution R19-2021**

Dear TPB Chair Henderson and Board members,

The Coalition for Smarter Growth is very disappointed that the special process and accountability voted on by the TPB board in 2021 for Visualize 2050 has not materialized.

**To meet the requirements of Board resolution R19-2021 and improve Visualize 2050, we ask you to direct staff to do an assessment of the package of projects compared to Visualize 2045 and key TPB performance measures and strategies, and require agencies to review the results and reconsider projects before proceeding with the air quality conformity analysis.**

In summary:

1. The conformity inputs package fails to comply with the TPB Board's direction
  - Projects lack required information on GHG emissions and TPB priority strategies
  - A number of project descriptions make unsupported or contradictory claims or have incorrect information
  - TPB's zero-based budgeting checkmark evaluation yields results for many projects that contradict TPB policies and strategies
2. Too many proposed projects increase carbon emissions to meet TPB, COG, state and local climate goals.
3. Public comments in 2023, 2022, 2021 and 2020 have all called for a departure from the Visualize 2045 approach, yet this project list maintains the status quo for much of the region; and
4. The TPB board should pause the air quality conformity and take necessary steps to comply with its resolution and address TPB goals before proceeding. We propose steps to take.

**1. The Conformity Inputs Package fails to comply with Board Resolution R19-2021**

We appreciate the new public comment period held last year, local meetings held by Fairfax and Prince William counties, and the project changes considered. But for most projects, there's no evidence of compliance with the Board's resolution for a Zero-based budgeting process, required consideration of scenarios, or required information on how projects support regional goals like greenhouse gas (GHG) reduction.

**A. Required project information on GHG reduction and TPB priorities is missing**

- No agencies provided required statements to explain how their projects reduce GHG emissions or explain how they implement TPB priority strategies.
- Nearly half of the highway and arterial widening projects claimed to help the region meet its target to cut GHG emissions of cars and trucks 50% by 2030, despite well established evidence that these types of projects generally increases emissions.

**B. Unsupported and incorrect project information - some examples:**

- A number of projects built long after 2030 claim to help the region meet its 2030 GHG goal (e.g., widening Fairfax County Parkway in 2045, Frederick Freeway new interchange built in 2040, Ox Road widening in 2045, Braddock Rd widening in 2045, Indian Head Highway new interchanges in 2040, etc.)
- The major regional project, MD I-495/270 Toll Lanes, provided project description sheets with multiple additional corridor segments outside of those indicated in the project titles and the TPB March 1 staff memo summarizing project changes. The corrected project descriptions were still not available to the public as of March 20.
- The Frederick freeway widening and interchange project north of Frederick claims to support Metrobus and BRT.

**C. TPB's zero-based budgeting checkmark evaluation yields contradictory results**

TPB staff's [checkmark evaluation](#) is based on vague federal planning factors checked off by the sponsor agencies, not actual TPB policies. Many of the project results don't make sense given TPB's priority strategies. Some examples:

- Widening the already eight-lane Chain Bridge Road through Tysons Corner, while the area tries to become more walkable and transit-friendly, gets a perfect 8 out of 8 checkmarks in meeting regional goals.
- Georgia Avenue NW bus lanes and safety improvements only gets 2 out of 8 checkmarks in meeting regional goals.
- Graham Park Road capacity reduction - adding bike lanes and a missing sidewalk and taming traffic near a middle school in Prince William County only gets 3 checkmarks
- 23 road widening projects – over a third – get checkmarks from TPB for “Environmental Protection,” despite being inconsistent with the activities that TPB's policy framework lists for that goal.

**2. Too many proposed projects increase GHG emissions for the region to meet TPB, COG, state and local climate goals**

- The proposed project list is similar to that in Visualize 2045, which fell far short of meeting our climate targets. While some local jurisdictions removed a few road widening projects, other highway expansions were added. Almost no new transit projects are in the plan.

- Decades of evidence show that [road and highway expansion increases GHG emissions](#), yet almost half of the road widening projects insist they will help TPB meet its ambitious 2030 GHG target.
- [TPB's Climate Mitigation Study](#) showed that to meet GHG targets, the region needs to reduce car dependence in addition to achieving fast adoption of electric vehicles.
- Visualize 2045 would only achieve a reduction in per capita passenger car vehicle miles traveled (VMT) of 5% by 2045. TPB's Climate study showed that an approximate 20% reduction is needed by 2030, with deeper reductions by 2050, in combination with rapid adoption of electric vehicles to achieve the COG 2030 Climate and Energy Action Plan. Numerous studies elsewhere in the US have arrived at similar numbers. Even deeper reductions of per capita VMT and faster electrification would be needed to achieve TPB's GHG reduction target adopted in 2022.
- Local climate action plans in our region require similar action.
- TPB and national studies show feasible ways to get the region close to its GHG targets. It's doable but we can't get there with this Visualize 2050 approach.

### **3. Public comments have called for a departure from the Visualize 2045 approach, yet this project list maintains the status quo in much of the region**

- [Public involvement results for Visualize 2050](#) call for **less road expansion, and more transit, ped/bike facilities and safer streets** - according to the TPB staff summary of 2023 public involvement for Visualize 2050, of the almost 1,000 project comments, the "overarching themes" were:
  - "strong negative sentiment towards roadway widening and expansion projects"
  - "strong positive sentiment towards passenger rail expansion and improvements, bus improvements, bicycle and pedestrian infrastructure improvements, and BRT projects"
  - "support for roadway improvements that include traffic calming features but desires for more bicycle, pedestrian, or bus infrastructure improvements"
  - "advancement toward climate goals" and "reducing car dependence"
- These main public comment themes are similar to those received in [2022](#) and [2021](#) on Visualize 2045.
- The [2020 Voices of the Region](#) scientific survey of the region's residents also found that residents are more concerned about climate change than congestion, support bus lanes and more space for walking and biking, and that future generations will thank us more for clean transportation, transit, walking, and biking investments than for wider roads.
- Some jurisdictions have project packages that support this approach and applaud the transit, pedestrian, bicycle and safe local complete streets projects.

#### **#4 Recommended steps to fix Visualize 2050 before starting the Air Quality conformity modeling:**

1. Project sponsors provide the required information for their projects and fix errors and obvious inconsistencies in their results.
2. TPB staff develop a quantitative assessment of the collective list of proposed projects, and compare these data with the last plan Visualize 2045's regionally significant projects and key TPB goals, targets, priority strategies, and performance measures. This assessment could include easily calculated metrics such as:
  - # miles new highway and arterial lanes
  - # miles of new dedicated bus lanes
  - # miles of road diets (reduced lane capacity)
  - # miles of new rail track
  - # new rail stations
  - Total project costs for roadway capacity expansion
  - Total project costs for transit network expansion
  - Land use goal assessment - comparison of recent (construction data for 2019-2023) and planned (Round 10) development patterns versus COG/TPB goals for locating 75% of new housing and jobs in High Capacity Transit station areas and in Activity Centers.
3. Analysis based on above metrics of how the new projects in total are likely to perform with respect to TPB's GHG target, safety targets, and priority strategies (e.g., Expand BRT and Transitways; Reduce travel times on all bus services; Move more people on Metrorail and commuter rail; Improve walk and bike access to transit)
  - Available tools like the [SHIFT calculator](#) are available for quick analysis.
4. Reconsideration of projects for submission into plan by TPB member agencies based on these results.

Visualize 2050 is the region's last long-range plan that can shape whether the region, states, and localities meet 2030 greenhouse gas targets and support the 2030 COG housing targets. The urgency of the climate crisis, our housing challenges, failed road safety targets, and equity needs are why this board voted for Resolution R19-2021.

Thank you for your attention to this issue.

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