



MEMORANDUM

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

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 on Tuesday, January 16, 2024 and noon on Tuesday, February 20, 2024, the TPB received two comments submitted via email.

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

PUBLIC COMMENT

Tad Aburn – Comments and Letters via Email – February 19, 2024

Tad Aburn, a member of a DC Environmental Justice Coalition, provided a comment regarding his earlier comments and letters on Transportation Related Air Pollution. They ask the TPB to follow its federally approved public participation guidance and policies and to respond appropriately to the issues raised in the comments and letters of the past year on air pollution local hot spots. Mr. Aburn offered language that he says he found in various documents regarding public input and various policies.

Bill Pugh – Comments via Email – February 20, 2024


Bill Pugh, a Senior Policy Fellow with the Coalition for Smarter Growth, provided comments that relate to lowering greenhouse gas emissions and climate change. Mr. Pugh noted that at the current rate of progress on the National Capital Trail Network, its completion will take 30 years. Mr. Pugh also noted that within the past two years since the board adopted its GHG reduction targets, there have been no performance metrics or tracking of strategies reported back to understand how the region is meeting its goals. Mr. Pugh commends the TPB's climate resilience work but emphasized that the TPB also needs to be a regional convener and leader on GHG reduction for transportation.

Item 1 Virtual Comment Opportunity

George Aburn <tadaburn@gmail.com>

Mon 2/19/2024 8:52 AM

To:TPBcomment <tpbcomment@mwkog.org>;Lyn Erickson <lerickson@mwkog.org>
Cc:chenderson@dccouncil.gov <chenderson@dccouncil.gov>;callen@dccouncil.gov <callen@dccouncil.gov>;William Washburn <william.washburn1@comcast.net>;Tene Lewis <MzTLewis616@gmail.com>;Janet Phoenix <jphoenix@gwu.edu>;Parisa Norouzi <parisa@empowerdc.org>;Darden, Wesley <Wesley.Darden@montgomerycountymd.gov>;Jeffrey King <jking@mwkog.org>

 2 attachments (145 KB)

TPB 02212024 Final Written TPB Comment Tad w DC EJC.pdf; TPB Letter 02212024 Final Supplemts 2-21 virtual comments.pdf;

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

My comments are attached.

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

I have also attached a letter for your 2/21/24 TPB meeting materials that provides supplemental information.

Thanks again for your help.

Tad Aburn

(443) 829-3652

Comments for the February 21, 2024 TPB Meeting

Tad Aburn¹

DC Environmental Justice (EJ) Coalition

tadaburn@gmail.com

(443) 829-3652

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 Environmental Justice (EJ) Coalition including 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, William Washburn, Climate Justice Chair, Washington DC Branch, NAACP and myself.

Our comment today is very simple.

Is TPB ignoring substantive public comment?

Last month, we submitted comments requesting that TPB respond to our numerous earlier comments and letters on Transportation Related Air Pollution or “TRAP” ... specifically ... how is TPB addressing the now well documented problem of high-risk air pollution hot-spots being created in environmental justice communities of color across the DC region by TPB transportation plans and projects. A copy of our January 17, 2024 comments is attached.

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. In 2022, I was the Chair of MWAQC TAC. I was an MWAQC member for over 10 years. For almost 20 years I was the Director of the air pollution program in Maryland. I worked for MDE for 40 years.

TPB's federally approved procedures for public participation require that TPB "provide information on how public input will be used." This has not happened.

I have also submitted a short letter to TPB and the MWCOG Board to supplement these comments as the virtual comments allowed by TPB must be less than 375 words.

Thank you again for providing the opportunity to provide public comment. We would be happy to discuss our concerns with you.

Tad Aburn
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February 21, 2024

Christina Henderson, Chair, MWCOG Transportation Planning Board (TPB)
Charles Allen, Chair, MWCOG Board
Members, MWCOG TPB
777 North Capitol St. N.E.
Suite 300
Washington, DC 20002

RE: Public Participation Concerns

Chair Henderson, Chairman Allen, TPB members:

This is the “supplemental information” letter mentioned in my virtual public comments for the February 21, 2024 TPB meeting.

My comments for that meeting are below:

“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 Environmental Justice (EJ) Coalition including 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, William Washburn, Climate Justice Chair, Washington DC Branch, NAACP and myself.

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Last month, we submitted comments requesting that TPB respond to our numerous earlier comments and letters on Transportation Related Air Pollution or “TRAP” ... specifically ... the now well documented problem of high-risk air pollution hot-spots being created in environmental justice communities of color across the DC region by TPB transportation plans and projects. A copy of our January 17, 2024 comments is attached.

TPB’s federally approved procedures for public participation require that TPB “provide information on how public input will be used.” This has not happened.

I have also submitted a short letter to TPB and the MWCOG Board to supplement these comments as the virtual comments allowed by TPB must be less than 375 words.

Thank you again for providing the opportunity to provide public comment. We would be happy to discuss our concerns with you.”

The comments submitted by the DC EJ Coalition to TPB on February 21, 2024 simply ask TPB to follow its own federally approved public participation guidance and policies and to respond appropriately to the issues raised in comments and letters over the past year on air pollution hot-spots that are created by TPB transportation plans and programs.

A sampling of specific language from TPB guidance, by-laws and policies that is not being followed is provided below:

- “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.
- “Staff strive to acknowledge receipt of public input in a timely manner and provide information on how public input will be used. This will build trust by demonstrating the value and purpose of input.”
- “Staff strive to maximize public input by involving the public early in the planning processes. Staff also strive to involve the public throughout the process to create repeat interactions with the public. This will help foster transparency and keep

the public up to date and aware of future opportunities to learn more and participate.”

- “Staff strive to incorporate an equity perspective into their work activities so that work acknowledges and seeks to accommodate different contexts, experiences, and abilities. This equity perspective is informed by COG’s Title VI Plan and Program, the TPB Equity Statement, and the TPB’s Equity Emphasis Areas.”
- “It is the TPB’s policy to provide public access and involvement under a collaborative planning process in which the interests of all TPB constituencies are reflected and considered. It is the TPB’s intent to make both its policy and technical processes inclusive of and accessible to all constituencies. The TPB believes that public input into its process is valuable and makes its products better. Regional transportation planning cannot, and should not, be based simply upon technical analysis. The information derived from public involvement is essential to good decision making.”

There have been public comments, letters, data and technical analysis submitted on the issue of environmental justice and transportation driven air pollution hotspots since late 2022. There has not been one single response or other information provided to the members of the public who have made these comments.

The courtesy of a response is requested.

Sincerely,

George S. (Tad) Aburn

Tad Aburn

tadaburn@gmail.com

(443) 829-3652

Comment for meeting tomorrow

Bill Pugh <bill@smartergrowth.net>

Tue 2/20/2024 12:01 PM

To:TPBcomment <tpbcomment@mwkog.org>

The Coalition for Smarter Growth provides the following comment for today's agenda:

- The TPB staff presentation last month on the National Capital Trail Network showed that at the current rate of progress, it will take 30 years to build out the plan.
- Completing the Trail Network is one of TPB's eight adopted GHG reduction strategies.
- It's been nearly two years since the board adopted strong GHG reduction targets and a set of strategies but there've been no products reported back to the board, and no tracking on implementation of strategies, aside from electric vehicles.
- We commend TPB for the great work on climate resilience, but TPB also needs to be a regional convener and leader on GHG reduction for transportation.
- TPB's climate change mitigation study showed that regional solutions are critical and must happen fast to meet our 2030 climate targets.
- The region's residents repeatedly ask TPB member agencies to move faster on addressing the region's largest source of GHG emission - look at the comments on the Visualize 2045 plan, last year's proposed projects for Visualize 2050, and the scientific Voices of the Region survey.
- Next month there will be a public comment period on Visualize 2050 projects and your progress toward greenhouse gas commitments. The TPB board in 2021 committed to do a new plan, an early update to strive for our climate and other regional goals.

Thank you for your work for the region.

Bill Pugh, AICP CTP | Senior Policy Fellow

Coalition for Smarter Growth

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(202) 821-3226

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