



MEMORANDUM

TO: Transportation Planning Board
FROM: Lyn Erickson, Plan Development and Coordination Program Director
SUBJECT: Public Comment for the January 2023 TPB Meeting
DATE: January 18, 2022

The Transportation Planning Board accepts public comment on a rolling basis. Comments can be submitted via email (tpbcomment@mwkog.org), online (mwkog.org/tpbcomment), 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 the December 2022 TPB meeting and noon on Tuesday, January 17, 2023, the TPB received two comments submitted via email with attached letters and one request to provide public comment in-person.

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

PUBLIC COMMENT

Arlene Montemarano – Email – January 11, 2023

Montemarano, submitted an e-mail forwarding a 2023 article about highway widening and congestion. A copy of the remarks is attached.

Tad Aburn – Letters via Email – January 17, 2023

Aburn, a former Maryland Department of the Environment representative on MWACQ, provided written comment, letters, and supporting attachments asking TPB to consider updating regional policies and projects that may contribute to environmental justice issues. The written comment, letters, and concept paper are attached.

Bill Pugh, Coalition for Smarter Growth – In-person – January 18, 2023

Pugh, on behalf of the Coalition for Smarter Growth, will provide in-person public comment at the TPB meeting on January 18, 2023.

Marcela Moreno

From: Arlene Montemarano <mikarl@starpower.net>
Sent: Wednesday, January 11, 2023 12:15 AM
Subject: Why do we just keep widening highways?

Why indeed! Widening urban roads, history shows us again and again, causes more problems than it solves. Much destruction, little benefit, and that little benefit is short-term. So why not rethink this outmoded response to traffic woes?

Even more self-destructive than urban road widening itself, would be turning the entire thing over to a private international corporation to implement and draw private profits from, with its inherent loss of public control, for decades to come. That's a noose we do want to avoid.

(Bolding is mine.)

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https://www.nytimes.com/2023/01/06/us/widen-highways-traffic.html?unlocked_article_code=lyyll-PBE5sQIdJs9A5ILp7utntdGWlzzpjH6bkM798177kO59u5WoiOUNaRL5-splohAc7_FKh1brTCyVHukZvFNOz9ChfKChCnZEsauCxSVzQoq9mV8rsRMzPzWusJgdjEOjNKGz8QLvwbTsrYTEk0w8_QxyKV5wPt-LGHED3wqrB3bY-6_7Mx5HO_LDZca3yA3zRvLcSHXDvDzxbHTbWfYs7sbCZ73APNDuqHzVklAJJyoqcCHui48kylwGl_fhyTHDZLY_6f-C8wWr4vccvKh6OOwkgwFQYH7XX3KEG6AXDTYNjxS-PI5b4PwrAbaUvni6BdeKrn_Qc&smid=share-url

Link shows many graphics to accompany article.

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

Widening Highways Doesn't Fix Traffic. So Why Do We Keep Doing It?
By Eden Weingart and Alyssa Schukar | Jan. 6th, 2023

Interstate 710 in Los Angeles is, like the city itself, famous for its traffic. Freight trucks traveling between the city and the port of Long Beach, along with commuters, clog the highway. The trucks idle in the congestion, contributing to poor air quality in surrounding neighborhoods that are home to over one million people.

The proposed solution was the same one transportation officials across the country have used since the 1960s: Widen the highway. But while adding lanes can ease congestion initially, it can also encourage people to drive more. **A few years after a highway is widened, research shows, traffic — and the greenhouse gas emissions that come along with it — often returns.**

California's Department of Transportation was, like many state transportation departments, established to build highways. Every year, states spend billions of dollars expanding highways while other solutions to congestion, like public transit and pedestrian projects, are usually handled by city transit authorities and receive less funding.

Over the next five years, states will receive \$350 billion in federal dollars for highways through the

infrastructure law enacted last year. While some have signaled a change in their approach to transportation spending — including following federal guidelines that encourage a “fix it first” approach before adding new highway miles — many still are pursuing multibillion dollar widening projects, including in Democratic-led states with ambitious climate goals.

The Biden administration has suggested that states should be more thoughtful in their solutions to congestion. Sometimes widening is necessary, Transportation Secretary Pete Buttigieg said, but other options for addressing traffic, like fixing existing roads or providing transit options, should be considered. **“Connecting people more efficiently and affordably to where they need to go,” he said, “is a lot more complicated than just always having more concrete and asphalt out there.”**

Some communities and government officials are pushing back on widening plans. In Los Angeles, this opposition had an impact. After \$60 million was spent on design and planning over two decades, the Route 710 expansion was canceled last May.

“We don’t see widening as a strategy for L.A.,” said James de la Loza, chief planning officer for Los Angeles County’s transportation agency.

It remains to be seen if the cancellation is the start of a trend or an outlier. Widening projects are still in the works for highways in Texas, Oregon and Maryland, to name a few. New York City is even considering re-widening the traffic-choked Brooklyn Queens Expressway.

The cancellation of the Route 710 expansion came after California learned the hard way about the principle of “induced demand.”

In 2015, a \$1 billion project to widen a 10-mile stretch of Interstate 405 through Los Angeles was completed. For a period, “congestion was relieved,” said Tony Tavares, the director of Caltrans, California’s Department of Transportation.

But that relief did not last. **Rush hour traffic soon rebounded**, he said.

When a congested road is widened, travel times go down — at first. But then people change their behaviors. After hearing a highway is less busy, commuters might switch from transit to driving or change the route they take to work. Some may even choose to move farther away.

“It’s a pretty basic economic principle that if you reduce the price of a good then people will consume more of it,” Susan Handy, a professor of environmental science and policy at the University of California, Davis, said. “That’s essentially what we’re doing when we expand freeways.”

The concept of induced traffic has been around since the 1960s, but in a 2009 study, researchers confirmed what transportation experts had observed for years: In a metropolitan area, when road capacity increases by 1 percent, the number of cars on the road after a few years also increases by 1 percent.

For years, critics of the Route 710 plan had voiced concerns that the widened highway would lead to more greenhouse gas emissions and the bulldozing of the communities around it.

The 2018 proposal for this segment of Route 710 would have widened the roadway to four lanes in either direction, added two truck bypass lanes in either direction and widened the road shoulders.

In late 2020, the E.P.A. ruled that the widening plan violated the federal Clean Air Act, and officials paused the project. Then last spring, Caltrans canceled the project altogether. Mr. Tavares said it was

“probably the most significant” cancellation in the agency’s history.

Caltrans is considering alternatives to address traffic on the Interstate, including moving freight to a rail line.

“Caltrans in the past was very focused on dealing with congestion primarily,” Mr. Tavares said. “We have since pivoted, completely done a 180.”

State transportation agencies said they have shifted their focus to **providing people with options other than driving** and were planning to divert money to projects that would benefit communities surrounding Route 710. Options include improving air filtration in schools, providing better access to green spaces and investing in a zero-emissions truck program.

Yet there are still plans to widen other highways in the state. “One size does not fit all for transportation, and California is definitely not one size,” Mr. Tavares said.

On an unseasonably warm day last November, dozens of northern New Jersey residents gathered in the shadow of a highway overpass in Jersey City, just across the Hudson River from New York. In a densely populated state with expansive transit infrastructure, many in attendance wondered why officials were planning to widen the highway.

“If we want to be a leading state, look at what Colorado is doing in ending their highway expansions. Look at Los Angeles,” Jimmy Lee, president of Safe Streets JC, said.

New Jersey transportation officials plan to reconstruct and add up to four lanes to sections of the New Jersey Turnpike leading to the Holland Tunnel. In addition to carrying traffic into Manhattan, the turnpike is, like Route 710 in Los Angeles, an artery heavily trafficked by freight trucks carrying goods between ports and warehouses in the area.

The project, which will cost an estimated \$10.7 billion, includes rebuilding elevated roadways and the bridge over Newark Bay on the 66-year-old highway.

“Congestion is not safe,” Ms. Gutierrez-Scaccetti said. “I don’t advocate widening roads just for the sake of widening.”

The project has the support of New Jersey’s governor, Philip D. Murphy, a Democrat who set ambitious climate goals for the state, and local labor leaders. Mark Longo, director of an organization representing heavy equipment operators, said the expansion is “the single most important road project for the economic future of New Jersey.”

The proposed expansion would add two lanes in either direction on the bridge over Newark Bay, one lane in either direction on segments in Bayonne and Jersey City and widen the road shoulders. The last segment leading up to the Holland Tunnel would remain at two lanes in each direction but be widened to add shoulders.

The New York Times

Critics of the plan say the congestion can be addressed in other ways, including investing in public transit. Officials in Hoboken and Jersey City, which surround the highway and have some of the worst air quality in the country, have denounced the plan.

“There are other types of mobility that people value instead of just cars,” Jersey City Mayor Steven Fulop said.

Image

An aerial view of a wide highway, with the skyline of Houston in the background.

The expansion of the Katy Freeway in Houston was initially hailed as a success. But within five years, peak hour travel times were longer than before the expansion. Credit...Alyssa Schukar for The New York Times

An aerial view of a wide highway, with the skyline of Houston in the background.

HOUSTON

For critics of widening projects, the prime example of induced demand is the Katy Freeway in Houston, one of the widest highways in the world with 26 lanes.

Immediately after Katy’s last expansion, in 2008, the project was hailed as a success. But within five years, peak hour travel times on the freeway were longer than before the expansion.

Matt Turner, an economics professor at Brown University and co-author of the 2009 study on congestion, said adding lanes is a fine solution if the goal is to get more cars on the road. But most highway expansion projects, including those in progress in Texas, cite reducing traffic as a primary goal.

“If you keep adding lanes because you want to reduce traffic congestion, you have to be really determined not to learn from history,” Dr. Turner said.

“Expanding roads does not create more congestion,” transportation officials said in a statement. Rather, they said, it “helps to manage new travel demand.”

The Texas Constitution mandates that the majority of transportation funds go to improving the highway system. Over the next year, the state plans to spend about 86 percent of its budget on highway projects.

One of those is a \$9 billion plan to reconstruct and widen a section of Interstate 45, which crosses paths with the Katy Freeway. Transportation officials said the project would improve safety, reduce congestion and address flooding along the roadway.

The project runs from suburban Greenspoint to downtown Houston. The proposed design for this segment would replace the H.O.V. lane with two managed lanes in each direction, add a lane to the frontage roads in each direction and widen the road shoulders.

The plan for Route 45, Dr. Handy said, is another project being sold as congestion reduction.

The Texas transportation department estimates more than 1,000 people and 300 businesses in the surrounding neighborhoods, where most residents are Black and Hispanic, would be displaced by the expansion.

At the same time, officials at Houston’s public transportation agency are pulling together funding from bonds and federal grants for an additional way to address congestion and growth: 500 miles of improvements to public transit.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

The State's plan to add 4 private toll lanes to 495 and 270 will have significant, irreversible negative impacts on Maryland, its air, water, land, climate, residents and communities, historic resources, ecosystems, flora, and fauna.....Sierra Club. I would add its finances, which will be hobbled for 50 years, by contract.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

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Comments for the January 18, 2023 TPB Meeting

Tad Aburn

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

My comments are again on the emerging issue of transportation and environmental racism. At your November meeting, I submitted comments on this issue that focused on a specific project, the District of Columbia's Claybrick Road Project in Prince George's County Maryland - a poster child for government supported environmental racism. My comments today are on the underlying regional transportation, air quality and land use policies that are now driving this unintentional racial inequity across the entire region. You should ask the COG staff to provide a briefing on how widespread this problem has become.

The TPB is recognized as a national leader on difficult transportation issues. This is a very difficult, emerging issue involving racial equity, transportation planning and air quality policy. Significant additional information is provided in the letter dated 1/18/2023 provided to COG staff and available in your Board packet..

The bottom line is that current transportation, air quality and land use policies have unintentionally created high risk, air quality hotspots in communities of color. Every single Board member can identify a community of color in their jurisdiction where the air pollution from diesel trucks, traffic congestion and numerous other sources is much worse than the average air pollution in the region. This is not coincidental. It is a direct result of the regional transportation and air quality policies being implemented in the MWCOG region.

You can begin to fix this issue now. The 1/18/2023 letter includes a short concept paper on how to begin to right this wrong.

In closing, racial equity and transportation justice are two of the most important issues that TPB must address. I urge you to show real leadership. Begin to update older transportation, air quality, zoning and land use policies that are now well recognized to enable and promote environmental racism. Work with your members to rethink the Claybrick Road project and other similar projects going on across the region immediately ... they only add to the existing inequitable environmental burden being

forced upon communities of color by outdated policies. These projects, once they are built, last forever.

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January 18, 2023

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

RE: More Detailed Letter of Concern for 01/18/2023 TPB Meeting

Chairman Collins, Board members, thank you for providing the opportunity to provide public comment for the January 18, 2023 TPB meeting. This letter is the letter containing more detailed information mentioned in my short written public comments for the 01/18/2023 TPB meeting.

My comments are on a critical issue now surfacing in the Washington, DC metropolitan area ... racial inequity and transportation and environmental racism.

My name is Tad Aburn. Last year I was the Chair of the MWAQC Technical Advisory Committee. I was an MWAQC member for over 10 years. For almost 20 years I was the director of the air pollution program in Maryland. I am now retired and commenting today as a concerned citizen.

The recent attached letter to the MWCOG Board leadership and the Chair of MWAQC provides additional information on how transportation, air quality and zoning and land-use policies are unintentionally driving environmental racism throughout the region. It also provides a short framework for how MWCOG can begin to address this difficult issue.

In closing, racial equity and environmental racism will be one of the most important issues that MWCOG will need to address over the next 10 years. I urge you to show real leadership and begin to address this difficult issue.

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

George S. Aburn Jr.

Tad Aburn

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Cc: TPB Members

Dr. Sacoby Wilson, UMCP CEEJH

Ted Dernoga, Prince George's County Council

Hannah Ashenafi, DC DOEE

Attachment 2 - Three Basic Steps that Need to be Implemented by MWCOG to
Begin to Address Environmental Racism in the Washington, DC Region*
December 20, 2022

Step 1 - Rethink and relocate current projects that are in the works that add to the existing environmental burden and make air pollution hotspots and racial inequity worse in communities of color throughout the Washington DC region.

Many of these projects, like the Claybrick Road project and the Ivy City project can be built elsewhere ... in an area that does not impact a community of color or in an area with a larger buffer between the emissions from the project and the communities that breathe the air.

Step 2 - Begin to work with VA, MD and DC to implement programs to reduce the existing inequitable exposures (hot-spots) to air pollution in communities of color throughout the region.

The efforts in Maryland provide a template to begin this work. The Maryland efforts involve:

- *Building community partnerships.*
- *The establishment of community based, hyper-local air monitoring networks.*
- *Implementing focused community-based inspection and enforcement programs to use existing authorities to begin to reduce emissions in communities of color for sources like diesel trucks, fugitive dust and air toxics from stationary sources.*
- *Adopting new regulatory or legislative programs to address difficult issues that are not covered by existing authorities like multi-pollutant, cumulative exposure to many air pollutants at the same time.*

Maryland has begun to implement community partnerships, enhanced, community based enforcement programs and has proposed three new regulatory initiatives to begin to address the issue of environmental racism. The MWCOG staff has several reports summarizing this work in Maryland.

Step 3 - Begin regional discussions on how to change existing air quality, transportation and land-use policies that are unintentionally driving environmental racism in the region. This is a very difficult step and will take time.

The most critical policy change that is needed is to rethink current land-use policies that continue to encourage dirty businesses to be built in communities of color because of antiquated zoning concepts.

* This paper was drafted by Tad Aburn. Mr. Aburn worked for 40 years for the Maryland Department of the Environment (MDE), was the MDE Air Director and a member of MWAQC for over 10 years, chaired MWAQC TAC multiple times and played a key role at MDE in beginning to implement policies and programs to address environmental racism from air pollution. Mr Aburn has recently retired.

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December 30, 2022

Christain Dorsey

Chair, MWCOG Board of Directors

Takis Karantonis

Chair, Metropolitan Washington Air Quality Committee (MWAQC)

777 North Capitol St. N.E.

Suite 300

Washington, DC 20002

Chairman Dorsey and Chairman Karantonis:

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

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

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

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

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

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

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

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

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

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

George S. Aburn Jr.

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

Tara Failey, Chair, MWCOG AQPAC
Roger Thunell, Chair MWAQC TAC
Kelly Crawford, Air Director, DC DOEE
Cristina Fernandez, USEPA
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January 10, 2023

The Honorable Muriel Bowser
Mayor, District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, MW
Washington, DC 20004

Mayor Bowser:

I am writing as I am concerned that you have not been adequately briefed on a proposed high polluting project that the District of Columbia (DC) Department of Transportation (DDOT) is proposing be built in an overburdened community of color in Prince George's County, MD.

My name is Tad Aburn and I am currently retired, but was, through November 2022, the Air Director for the Maryland Department of the Environment (MDE). I have worked with Tommy Wells and I am good friends with both Kelly Crawford and Hannah Ashenafi in your DC DOEE offices. I am currently doing volunteer work for overburdened communities in Maryland. I work closely with Dr. Sacoby Wilson and his University of Maryland Environmental Justice Center.

What is being proposed is a classic case of government driven environmental racism. I know of your stellar record and commitment to environmental justice issues and believe that you would not allow the DC DDOT project to be built in Ivy City or one of the Districts other environmental justice communities. I can only presume that you have not been well briefed on the DC DDOT proposed project in a Maryland environmental justice area on Claybrick Road, just outside of DC in Prince George's County. The project, which links to the metropolitan area's efforts to electrify buses, is well intended and will provide significant environmental benefits to the residents, the primarily white residents, of the region ... It is unfortunately being done at the expense of a small, overburdened community of color.

I have attached a recent letter to Dr. Amber Hewitt requesting her assistance with this issue. It includes additional details on the project. I have also attached a March 2022 letter from MDE to DC DDOT on this issue which has never been answered. In working with the community, it is very clear to me that transparency and not working openly with the community are also major issues.

In closing, I thank you for your leadership in the area of environmental justice and respectfully ask that the District consider an alternative, more appropriate site for the proposed Claybrick Road Project. In a meeting with the three Maryland Mayors who have expressed concern over this project, your senior DC leadership acknowledged that other sites were available. I urge you to relocate the project.

Respectfully

George S. (Tad) Aburn Jr.

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