



MEMORANDUM

TO: Transportation Planning Board
FROM: Lyn Erickson, Plan Development and Coordination Program Director
SUBJECT: Public Comment for the March 2023 TPB Meeting
DATE: March 15, 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), Visualize 2045 Initial Project List Feedback Form (<https://www.surveymonkey.com/r/Viz2050Update>), and phone. Comments are collected until noon on the Tuesday before the TPB meeting. These comments are compiled and shared with the board at the meeting the following day.

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

Between noon on Tuesday, February 14 and noon on Tuesday, March 14, 2023, the TPB received seven comments submitted via email, seven comments from the Visualize 2045 Initial Project List Feedback Form, and one request for in-person public comment.

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

PUBLIC COMMENT FROM VISUALIZE 2045 FEEDBACK FORM

Allen Muchnick – Project Comment via Online Form – February 27, 2023*

Muchnick provided feedback about the I-66 Improvement project, suggesting that VDOT should consider submitting the remaining elements of the megaproject as separate projects, tying I-66 widening to a commitment to toll I-66 in both directions, and reconfiguring the tolling system. Muchnick also suggested a commitment to complete all unbuilt segments of the National Capital Trail Network by 2030 and to list each unbuilt trail segment as a separate project.

Anonymous – Project Comment via Online Form – February 27, 2023*

A commenter provided feedback about the Arcola Boulevard Improvement project and suggested a project for consideration in Virginia.

Anonymous – Project Comment via Online Form – February 28, 2023*

A commenter provided feedback about the Union Station to Georgetown Streetcar Line in the District of Columbia.

Anonymous – Project Comment via Online Form – March 3, 2023

A commenter provided feedback about the I-66 Improvements (I-66 and US 29 Interchange, Widen and Construct US 29 and VA 55) stating that they believe part of the project has been completed, and incomplete or future elements should be resubmitted as a separate, new project.

Allen Muchnick – Project Comment via Online Form – March 3, 2023

Muchnick provided feedback about the Grant Avenue Road Diet suggesting that any unfunded elements should be resubmitted as a new, separate, and re-scoped project. Muchnick added that unbuilt segments of the National Capital Trail Network should be completed by 2030 and outlined key projects in Prince William County.

Anonymous – Project Comment via Online Form – March 13, 2023

A commenter provided feedback about the I-270, stating that any highway widening project will create induced demand and pollution, and to direct investments in transit. They also provided feedback on MARC improvements stating that rail infrastructure should be prioritized.

Anonymous – Project Comment via Online Form – March 13, 2023

A commenter provided feedback about the VA 123 Widening (Fairfax), stating that lane widening projects create induced demand and worsen congestion.

PUBLIC COMMENT

Kacy Kostiuk – Comment via Email – February 14, 2023

Kostiuk, a former TPB member, shared a letter about the Technical Inputs Solicitation for the Long-Range Transportation Plan. She asked the TPB to consider several questions, and that clarified definitions and measurable data will help understand if projects meet the synthesized policy framework.

Tad Aburn – Letters via Email – February 20, 2023

Aburn, a former Maryland Department of the Environment representative on MWACQ, provided letters following up to his comments on February 14. His letter contains asks TPB to provide an update on activities that the Board or its members are taking to meet climate change goals and including CO2 as part of the transportation conformity process. In addition, enclosed is a letter submitted to the MWCOC Air and Climate Public Advisory Committee (ACPAC).

Arlene Montemarano – Article via E-mail – February 24, 2023

Montemarano shared an article, "[Lessons learn from Boston could shape a more collaborative process on I-495 toll lanes project](#)" by Arthur Katz, with commentary celebrating Boston's transportation decisions.

Arlene Montemarano – Article via E-mail – March 9, 2023

Montemarano shared a statement from Transurban about the Maryland express lanes project. She expressed gratitude to different people involved in advocacy efforts about the project.

Tad Aburn – Letters via Email – March 14, 2023

Aburn provided comment asking the TPB to consider the need for additional climate change considerations in transportation issues. He added concerns that the Visualize 2045 EJ analysis did

not address health and environmental risk to vulnerable populations. In addition, there are enclosed supporting letters to his comment.

Kacy Kostiuk – Comment via Email – March 14, 2023

Kostiuk followed up on her letter about the Technical Inputs Solicitation for the Long-Range Transportation Plan on February 14. She asks the TPB to consider how the questions in the technical solicitation process can be modified to better measure and assess whether projects meet TPB's goals and aspirations. She also asks the TPB to consider a TPB-wide discussion on project priorities before the submission process.

Bill Pugh – Comment via Email – March 14, 2023

Pugh, Senior Policy Fellow of the Coalition for Smarter Growth, provided comment asking for members of the public to watch the Visualize 2050 listening sessions for transparency in the zero-based budgeting process and a more informed public feedback.

Public Comment Received from February 15 – March 14, 2023

The comments outlined below were received from the Visualize 2045 Initial Project List Feedback Form (<https://www.surveymonkey.com/r/Viz2050Update>) from February 15 – March 14, 2023 at noon. TPB staff has organized the original responses to the feedback form by state. Comments are reported monthly at the TPB Technical Committee and TPB meetings.

Table 1. District of Columbia Project Comment

Project	How did you learn about this project?	I support this project's inclusion in Visualize 2050?	Explain why you support/do not support the project's inclusion in the Visualize 2050. You can also share other comments about the project's inclusion in the plan.	Name
Union Station to Georgetown Streetcar Line	Project webpage	Neutral		

Table 2. Maryland Project Comment

Project	How did you learn about this project?	I support this project's inclusion in Visualize 2050?	Explain why you support/do not support the project's inclusion in the Visualize 2050. You can also share other comments about the project's inclusion in the plan.	Name
I-270"	Advocacy organization	Disagree	Any highway widening project 1) will induce MORE driving, not less, adding more pollution to the air, and 2) is a missed opportunity to invest in better bus rapid transit, light rail, or heavy rail. If so many people are using these highways and getting stuck in traffic it's a sign to "upgrade" to a higher-capacity system like buses or rail. Please apply my comment to any and all proposed highway widening projects in Maryland.	
MARC Improvements	Advocacy organization	Strongly agree	We NEED to prioritize better rail infrastructure. Electrification; greater service frequency; and better connections to other public transit systems must be top of the list and should be prioritized above ANY highway-widening projects to meet our climate goals and protect the environment for our children.	

Table 3. Virginia Project Comment

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

Grant Avenue Road Diet		Neutral	This project is largely, if not entirely, funded and about to go to construction. If any element is not fully funded for construction, it should be resubmitted as a new, separate, re-scoped project. This project would not expand roadway capacity.	Allen Muchnick
VA 123 Widening (Fairfax)	Advocacy organization	Strongly disagree	Any lane widening plan is doomed to failure from the start. The last thing needed is an extra lane for such useless endeavors. Especially when it makes the commute worse by creating an induced demand of vehicles thus creating more traffic than necessary. Northern Virginia is already polluted with enough cars and enough traffic, the last thing we need is a wider lane just for more traffic to congest it all over again. Northern Virginia requires more bike lanes, more train lines, more anything else but highway/freeway/route lane expansions. We NEED less traffic and less people in cars not more people in cars and more congestion on our roads.	

Table 4. Virginia Project Suggestions

Do you have any suggested projects that should be considered for the long-range transportation plan (Visualize 2050)?	Name
BRT	

Table 5. Multi-jurisdictional Project Suggestions

Do you have any suggested projects that should be considered for the long-range transportation plan (Visualize 2050)?	Name
Complete all unbuilt segments of the National Capital Trail Network by 2030. Each unbuilt trail segment should be listed as a separate project.	Allen Muchnick
Complete all unbuilt segments of the TPB's National Capital Trail Network by 2030. The individual trail segments could be listed as separate, standalone trail projects. For Prince William County, the key projects would include 1) the East Coast Greenway (Occoquan River to Stafford County line), 2) the I-66 Trail (Route 15 to Bull Run Rd in Fairfax County,	Allen Muchnick

<p>especially the crossing of Bull Run from the east end of Balls Ford Rd [and perhaps also from Vandoor Dr]), 3) the Rte 234/Manassas Bypass Trail from Brentsville Rd to I-66/VA-29 in Gainesville, 4) all Minnieville Rd shared-use path gaps, especially north of Rte 294 (erroneously depicted as existing), 5) Shared-use path crossings of I-95 and US-1, especially at Rte 234, Rte 294, Rte 123, Dale Blvd, and Opitz Blvd, 6) Rte 29 Trail (Fairfax Co. line to Fauquier Co. line), and 7) Signal Hill Rd from Liberia Ave to Signal View Dr (also erroneously depicted as existing). The other NCTN elements in PWC would presumably be built as part of concurrent road widening projects which are of otherwise dubious value.</p>	
<p>Cancel all highway widening projects - they will only increase car pollution and greenhouse gas emissions, making our planet hotter and deadlier. All money should be invested in electrification and public transportation, as well as making towns and cities accessible by bike and on foot.</p>	

Marcela Moreno

From: Kacy Kostiuk <kostiukk@gmail.com>
Sent: Tuesday, February 14, 2023 9:28 PM
To: TPBcomment
Subject: Item 1 Virtual Comment Opportunity

Good evening,

I am submitting the following public comments to be shared with the TPB for the Feb. 15 meeting. They are also saved [here](#). Thank you.

Dear Members of the TPB,

Thank you for the opportunity to share my comments. I'm writing about Item 7, adoption of the Technical Inputs Solicitation for the Long-Range Transportation Plan.

I applaud the TPB's decision to undertake the LRTP update earlier than normal and through a process different from "business-as-usual," with the aim of creating a plan that better aligns with the TPB's policy and climate goals.

As you consider the technical inputs solicitation, please think about the following questions:

- How will member agencies know if their projects meet the TPB's goals?
- How will the TPB know if projects meet your goals?
- How can the TPB ensure future LRTPs meet TPB's goals?

Clarifying definitions and collecting measurable data can help with each question. The Synthesized Policy Framework document is an excellent overview tool, but its "measuring performance" section is too minimal and does not identify measurable ways to identify whether projects or the entire LRTP are in line with the framework.

Some flexibility of interpretation can be useful, but this is too vague. In the past, highway expansion projects have checked boxes identifying themselves as reducing GHG emissions and improving transit. While they may make minor improvements related to these elements, they clearly do not go as far as other projects could to truly achieve those goals. With hundreds of projects in the LRTP, unclear data makes it difficult to identify how the plan or individual projects measure up.

The Technical Inputs Solicitation booklet mentions an "input solicitations guide" that will be shared with agencies but is not included in the TPB packet. It's my understanding that this guide will be the same as for past LRTPs, even though this plan is meant to be different.

I suggest that you request a copy of that document and review it as a Board, adding guidance on how agencies should answer questions so they and you can have a common understanding and produce useful data. One option is a scale or percentage of how much a project meets a particular goal, but there are many possible approaches. This will help not only for this LRTP but for future LRTPs.

Thank you for your work for this region.

Sincerely,

Kacy Kostiuk
Takoma Park
Former TPB member

Marcela Moreno

From: George Aburn <tadaburn@gmail.com>
Sent: Monday, February 20, 2023 11:20 AM
To: TPBcomment
Cc: Lyn Erickson
Subject: Fwd: Additional Information Letter for 2/15/23 TPB Meeting
Attachments: 021523 Final TPB Letter.pdf; AQPAC Letter on Process 013023 Final.pdf

Lyn - thanks for your feedback on this submission. I'm submitting it again - to the correct email address ... hoping that you could post it on the "other board packet materials" page. If possible, I would appreciate it. I do not expect it to get any attention, but I'm trying to keep the record as clean as I can.

I simply did not understand that public comment letters (not the comments) also need to go through the TPBcomment address. You live and you learn. If what I am asking is not possible ,, so be it ... there is always a next meeting.

Thanks again ... Tad

----- Forwarded message -----

From: George Aburn <tadaburn@gmail.com>
Date: Tue, Feb 14, 2023 at 8:19 AMgh
Subject: Additional Information Letter for 2/15/23 TPB Meeting
To: Lyn Erickson <lerickson@mwkog.org>
Cc: Jeffrey King <jking@mwkog.org>, Kanti Srikanth <ksrikanth@mwkog.he proprtorg>, Monica Beyrouti Nunez <mbeyrouti@mwkog.org>

The letter with additional information mentioned in my short written comment document for the 2/15 TPB meeting is attached.

I understand that this is not covered during the opportunity for public comment but that it can be made available to the Board through the 2/15 TPB Board Packet.

Thanks again.

Tad

tadaburn@gmail.com
(443) 829-3652n

Tad Aburn
39724 East Sun Drive, Unit 213
Fenwick Island, DE 19944
tadaburn@gmail.com
(443) 829-3652

February 15, 2023

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

RE: Additional Information for the 02/15/2023 TPB Meeting

Chairman Collins, Board members, thank you for providing the opportunity to provide public comment for the February 15, 2023 TPB meeting. This letter is the letter containing the additional information mentioned in my short written public comments for the 02/15/2023 TPB meeting.

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

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

The attached January 30th letter to the Air and Climate Public Advisory Committee (AQPAC) provides additional information on these issues.

The issues are not new issues.

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

on January 18th highlighted how regional transportation, air quality and land use policies are now driving unintentional racial inequity across the entire region. Today I am urging TPB to work through MWCOCG to update two critical transportation issues driven by climate change.

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

The two climate change issues are:

1. The work TPB is now doing to meet current MWCOCG climate change goals (50% by 2030) may be wasteful as the region needs to update its climate change goals to be consistent with the science and the goals set by other leadership organizations. Climate change goals in the 60% reduction by 2030 ... and net-zero emissions by 204 range ... are more consistent with the science and goals set in other leadership areas. This is particularly important to transportation planning as the strategies to meet the weaker, short-term climate change goals may not be the same as the strategies needed to meet tougher, long-term climate change goals.
2. TPB needs to include carbon dioxide (CO₂) as part of the transportation conformity process required under the Clean Air Act. This will ensure that updates to the region's Transportation Improvement Plans (TIPs) and Constrained Long-Range Plans (CLRPs) are consistent with the region's climate change goals ... before those plans are adopted. The models used by TPB to complete transportation conformity analyses already produce results for CO₂, so this should not be a resource intensive task to undertake.

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

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

George S. Aburn Jr.

Tad Aburn
tadaburn@gmail.com

(443) 829-3652

Cc: TPB Members
Dr. Sacoby Wilson, UMCP CEEJH
Ted Dernoga, Prince George's County Council
Hannah Ashenafi, DC DOEE

Additional information is provided in my letter to TPB dated 2/15/2023 provided to COG staff and available in your Board packet. This letter attaches a letter to ACPAC (the region's climate change public advisory committee). The issue will also be raised to CEEPC. Unfortunately, these committees do not routinely provide the opportunity for public comment at their meetings.

In closing, transportation planning, racial equity and climate change are three of the most important issues that TPB and MWCOG must address. I urge you to show real leadership and aggressively pursue solutions to these critical issues.

Tad Aburn
39724 East Sun Drive, Unit 213
Fenwick Island, DE 19944
tadaburn@gmail.com
(443) 829-3652

January 30, 2023

Tara Failey, Chair
Era Pandya, Co-Chair
ACPAC Committee Members
MWCOG Air and Climate Public Advisory Committee (ACPAC)
777 North Capitol St. N.E.
Suite 300,
Washington, DC 20002

Madame Chairman and ACPAC members:

Thank you for providing the opportunity for the public to listen in on your January 23, 2023 ACPAC meeting.

I am writing to make a request for ACPAC to discuss a specific issue at their next meeting and to provide public comment on several issues that were discussed during the January 23 meeting. I continue to have concerns over the process for public involvement in ACPAC. It seems inappropriate for a public advisory committee to ban the public from asking questions verbally or through the chat on the topics that are being discussed during meetings that are open to the public.

Since November, I have asked ACPAC leadership to include a session during your meetings on environmental justice ... from a community perspective. One of the most critical things that government needs to do on environmental justice is to listen to front-line community members who have to breathe the air. I would be happy to work with COG staff to identify community representatives and other local organizations with expertise on this issue (like Sacoby Wilsons CEEJH program) to participate in a 45 minute session.

On the EJ toolkit issue that was discussed on the 23rd, the one comment made by a committee member on adding more to the tool kit that ensures that it is actually being

used by MWCOG organizations is critical. As far as I can tell, I do not believe the tool kit is actually being used. The tool kit should address all three of the areas identified in the framework document that I attached to my comments for the 1/23 meeting. Right now the tool kit only addresses step 2. Steps 1 and 3 are actually the bigger challenges. Finally, there was good discussion on external reviewers. The one glaring omission from that discussion was the need to ask actual community members ... the people that breathe the air ... for input. I believe this is absolutely critical if the tool kit is to really begin to get at the issue of making progress on environmental justice. These comments were made through the chat during the 1/23 meeting, but I believe the COG staff did not allow those chat comments to be seen by committee members.

I am very concerned over the briefing and discussion on the 2023 ACPAC priorities. The basic purpose of any public advisory committee is to provide policy makers with input from the public on key issues of concern to the public. In ACPAC's case ... air quality and climate change. The concept included in the presentation that ACPAC can only work on "pre-approved" issues is not at all consistent with this concept. Having been on MWAQC when the original AQPAC was created, I believe that the elected officials want a totally independent public advisory committee ... not a committee that only works on a small set of pre-approved topics. I have listed three issues (in the form of questions) below that I believe should be high priorities for ACPAC in 2023 and discussed during your next meeting:

- What can be done to begin to reverse the inequitably high exposures to air pollution (hot spots) in overburdened communities of color that are being driven by outdated regional (MWCOG) air quality, transportation and land-use policies and programs.
- Why hasn't the region adopted stronger climate change goals consistent with science and other leadership organizations? The goals for a sophisticated, affluent area like MWCOG should be something like a 60% reduction by 2030 with a mandatory goal of net-zero emissions by 2045. Having weak goals can result in the wrong policies being chosen and implemented ... especially for the transportation sector.
- Why does the region not include carbon dioxide (CO₂), the most critical greenhouse gas, as part of the transportation conformity process required under the Clean Air Act. The models used to do the conformity process generate results for CO₂. With the underlying purpose of the transportation conformity process being to make sure that transportation plans are consistent with regional air quality (and now climate change) goals ... It seems clear to me that including CO₂ in that process is now critical.

Thank you again for allowing public comments. I would be happy to discuss these comments during your next meeting or with a smaller group of ACPAC leadership.

George S. Aburn Jr

Tad Aburn

tadaburn@gmail.com

(443) 829-3652

cc (to be distributed to MWCOG members by MWCOG staff):

Kate Stewart, Chair, MWCOG BOD

Anita Bonds, Chair, MWAQC

Tom Dernoga, Vice Chair, MWAQC

Takis Karantonis, Chair, CEEPC

Reuben Collins, Chair, TPB

Collin Burrell, DC DOEE

Dr. Sacoby Wilson, UMCP CEEJH

Hannah Ashenafi, DC DOEE

Sheila Salo

Karen Moe

Laila Riaz

Dylan Galloway

Marcela Moreno

From: Arlene Montemarano <mikarlgm@gmail.com>
Sent: Friday, February 24, 2023 11:44 PM
Subject: Lessons learned from Boston could shape a more collaborative process on I-495 toll lanes project

How nice to be able to celebrate decisions made long ago that have proven themselves successful today. Successful in saving the integrity of a city's social fabric and character by not tearing it apart with urban highways. Bravo Boston.

In the future, will Maryland celebrate its transportation decisions being made today? Or, (hopefully not), will we lament them? Maybe it depends upon the process.

(bolding is mine)

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<https://www.marylandmatters.org/2023/02/23/opinion-lessons-learned-from-boston-could-shape-a-more-collaborative-process-on-i-495-toll-lanes-project/?eType=EmailBlastContent&eld=3ec067b5-d3ff-4c12-a4e7-31095a1728b3>

www.marylandmatters.orgmarylandmatters.org

Feb. 23rd, 2023

By Arthur Katz

The writer is a resident of Rockville and critic of former Gov. Larry Hogan's proposed toll lane project along the D.C. Beltway.

There has been a long running controversy about the value of adding toll lanes to portions of I-270 and I-495. Many options and alternatives have been proposed in place of present plans, but the approach driven by controversy has been unsystematic – lacking a serious dialogue.

In contrast, I was recently on a Zoom call that celebrated the **50th anniversary of the November 30, 1972, decision by the Republican Governor of Massachusetts Frank Sargent to eliminate all the proposed urban highways in the Boston region except for one in construction and substitute mass transit. In addition, associated with that decision was a successful bipartisan campaign to open the federal Highway Trust Fund to permit mass transit funding.**

Among those on the call were two former secretaries of Transportation for the state of Massachusetts: Alan Altschuler, a noted political science who was recognized for studies of urban freeway controversies, and Frederick Salvucci, who subsequently spearheaded successful actions to replace a massive, elevated steel section of highway in the heart of Boston with an underground alternative that changed the face of downtown. Also participating were John Wofford, the Boston Transportation Planning Review (BTPR) director who subsequently became the deputy general counsel of the U.S. Department of Transportation, as well as the former Congressman Barney Frank, and several participants who would

become important planners, politicians, and community leaders.

Most relevant to the present situation is the meaningful influence of the **unique Boston Transportation Planning Review planning process** on the final decisions and actions. The BTPR was funded as the prototype for U.S. Department of Transportation regulations for the Environmental Impact Statement process — it was 1970 and the National Environmental Policy Act had just become law. The BTPR was, in the opinion of many, one of the best, if not the **best, participatory transportation planning processes over the last 50 years. At least two books have been written about it.**

I had the opportunity to be the chief negotiator in this process for the largest coalition of community and private interest groups, including environmental groups in the Boston region called the Greater Boston Committee on the Transportation Crisis. What made the BTPR process distinctive and important was that **public and interest groups (from construction unions to local communities) as well as was public officials were present at the table and represented from the earliest moments in the discussions of the detailed design of the study, the selection of contractors and the monitoring of the products of the study as they were produced.**

Further, the BTPR incorporated specific staff to act as an ongoing liaison between the technical staff and various community officials and the public in different physical sectors of the Boston region — to assure a communication flow in in both directions

In contrast, the current process for the I-495/ 270 Study was poorly conceived — resembling the **pre-ordained 1960s view of highway construction**. The current process used public input more as a PR mechanism that adjusted concerns and problems at the margins of the design just enough, but **never created the transportation planning process that seriously looked at the options.**

The current process is a **failure of politics and imagination**. It was based on the political mantra “we will build it and you will not have to pay for it.” Once that idea was embedded in the process, only toll road projects made sense. Moreover, in the desperate search for the politically acceptable, the Maryland Department of Transportation delayed the most politically sensitive eastern Beltway portion of the toll road, ending it between the I- 270 spurs — and in the process created a massive congestion chokepoint when the toll lanes end, undermining the overall viability of the project.

The Maryland Department of Transportation and the state’s governor, comptroller and treasurer, who sit on the Board of Public Works that control the approval of public-private projects, should **revisit the whole process that underpinned the decisions**. The BTPR model is worth looking at not because it exactly matches the current study needs, but because it navigated the highly charged political process in Boston to produce a workable result.

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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

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.

Marcela Moreno

From: Arlene Montemarano <mikarl@starpower.net>
Sent: Thursday, March 9, 2023 10:53 PM
Subject: Transurban announcement

Official statement from Transurban.

[TCL Maryland Express Lanes Project update.pdf \(yourir.info\)](#)

So many people contributed to this miracle. For many, the five-year battle began with Tom Hucker's building-bursting Town Hall that drew upwards of 700 residents. (That may have been the official count, but we know it was way more 😊)... Marc Elrich's steadfastness throughout, and that of strongly supportive Council members and elected officials in Annapolis... 1500 CAFE members who did all that they could to stand in determined opposition to a horrible prospect, and the Sierra Club, which provided the clout. The leadership of CAFE, and that of our supportive sibling group, Don't Widen 270.... And our new governor, and countless others, too many to recount here.

Because of them, we have been spared a lot of destruction, a lot of loss, with likely no measurable benefit whatsoever.

Yes, Virginia, there is a Democracy.

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Arlene Montemarano, 240-360-8691, Lawndale Drive

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Arlene Montemarano, 240-360-8691, Lawndale Drive

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Arlene Montemarano, 240-360-8691, Lawndale Drive

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

Marcela Moreno

From: George Aburn <tadaburn@gmail.com>
Sent: Tuesday, March 14, 2023 8:18 AM
To: TPBcomment; Lyn Erickson
Cc: Jeffrey King; Kanti Srikanth; collinsr@charlescountymd.gov; tedernoga@co.pg.md.us; Sacoby Wilson; Fernandez.Cristina@epa.gov; Burrell, Collin (DOEE); Hannah Ashenafi; Anita Bonds; Era_A_Pandya@mcpsmd.org; Julie Kimmel; pmendelson@dccouncil.gov; Washington, Christian (Council)
Subject: Item 1 Virtual Comment Opportunity
Attachments: TPB 031523 Final Written Comment .pdf; TPB Letter 03152023 Final.pdf; MWAQC Comments Final 022223.pdf; MWAQC Comments Final 022223.pdf; AQPAC Letter on Process 013023 Final.pdf; Mayor Bowser Final Letter 011023 (1) (1).pdf

Lyn

Please register me to provide virtual written public comment during the 3/15/23 TPB meeting. My short written comments are attached.

I have also attached a letter that supplies additional information for the 3/15/23 TPB Board packet ... the letter is mentioned in my short written comments.

Thank you again for your continued help with this process.

Tad

Tad Aburn
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Comments for the March 15, 2023 TPB Meeting

Tad Aburn

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

My comments today, again focus on two key issues ... the key roles transportation has in addressing environmental justice and climate change.

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

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

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

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

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

In closing, transportation planning, racial equity and climate change are three of the most important issues that TPB and MWCOG must address. I urge you to show real leadership and aggressively pursue solutions to these critical issues.

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March 15, 2023

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

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

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

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

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

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

The issues are not new issues.

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

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

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

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

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

The two climate change issues are:

1. The work TPB is now doing to meet current MWCOCG climate change goals (50% by 2030) may be wasteful as the region needs to update its climate change goals to be consistent with the science and the goals set by other leadership organizations. Climate change goals in the 60% reduction by 2030 ... and net-zero emissions by 2045 range ... are more consistent with the science and goals set in other leadership areas. This is particularly important to transportation planning as the strategies to meet the weaker, short-term climate change goals may not be the same as the strategies needed to meet tougher, long-term climate change goals.
2. TPB needs to include carbon dioxide (CO₂) as part of the transportation conformity process required under the Clean Air Act. This will ensure that updates to the region's Transportation Improvement Plans (TIPs) and Constrained Long-Range Plans (CLRPs) are consistent with the region's climate change goals ... before those plans are adopted. The models used by TPB to complete transportation conformity analyses already produce results for CO₂, so

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

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

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

George S. Aburn Jr.

Tad Aburn

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

Copy of Comments Made by Tad Aburn
MWAQC Meeting
February 22, 2023

tadaburn@gmail.com
(443) 829-3652

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

My comments today follow up on the comments I made on December 7, 2022 and focus on the issue of how MWAQC and other MWCOG policies are creating air pollution hotspots in environmental justice communities.

My name is Tad Aburn. In October of 2022, I was the Chair of MWAQC TAC. For the past 10 years I was the MDE air director and an MWAQC member. I am now retired ... doing volunteer work for overburdened communities in Maryland ... and commenting today as a concerned citizen.

At your November meeting, my comments focused on a specific project, the District of Columbia's Claybrick Road Bus Project in PG County - a poster child for government supported environmental racism. My comments today focus more on how regional MWCOG air quality, climate change, transportation and land use policies are now working synergistically to drive unintentional racial inequity. EPA is now requiring that these issues be addressed as part of the MWAQC air quality plans.

Some are trying to characterize this issue as a "local" issue. It is not. The unfortunate combined impact of MWCOG policies is a widespread regional problem taking place in many areas across the region. The problem is driven by incomplete regional air quality, climate change, land-use and zoning policies that create air pollution "hot spots" in many low income communities of color. State and community-based monitoring shows that, although air pollution in general has improved across the region, the air quality in many communities of color remains unhealthy. Later on your

agenda today, Dr. Russ Dickerson will mention some of the high-risk black carbon air pollution problems being experienced in areas like Ivy City and the Sherriff Road/Cheverly communities.

Additional information on this issue (and the other issues mentioned below) is provided in recent letters to MWAQC leadership, TPB, the MWCOG Board and ACPAC, your advisory committee for air quality and climate change. A February 22, 2023 letter to MWAQC that attaches these other letters was provided to COG staff and I believe is included in the additional materials that COG staff has made available for today's meeting.

There are three other issues that the February 22, 2023 letter and attachments raise. These are:

1. The environmental justice toolkit needs to be expanded and improved ... it is not clear to me that anyone is using it ... you have a briefing on this later on your agenda,
2. The region's climate change goals need to be strengthened to be consistent with the science, and
3. The transportation conformity process needs to better address greenhouse gas goals to insure that air quality strategies do not conflict with long-term climate change goals.

In closing, environmental justice issues driven by MWAQC and other regional policies and climate change are two of the most important issues that TPB and MWCOG must address. I urge you to show real leadership and aggressively pursue solutions to these critical issues.

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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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Cc: Dr. Sacoby Wilson, UM CEEJH
Dr. Amber Hewitt, DC ORE
Tommy Wells, DDOE
Carla Longshore, DDOT
Kelly Crawford, DDOE
Hannah Ashenafi, DDOE
Phil Mendolson
Sheila Sailo
Kaern Moe
Laila Riazzi
Dylan Galloway

Marcela Moreno

From: Kacy Kostiuk <kostiukk@gmail.com>
Sent: Tuesday, March 14, 2023 11:41 AM
To: TPBcomment
Subject: Public comments for the TPB - March 2023 Meeting

Dear Members of the Transportation Planning Board:

Thank you for your work in your communities and across the region.

Last month, I sent a letter directly to some of you because I missed the deadline to submit the letter to the full TPB as part of public comments. In that letter, I expressed concern that more work is needed to ensure that the updated Long Range Transportation Plan is as innovative and meaningful as I think the TPB hopes it will be.

This month, I'm writing to build on my previous letter and recommend that you carefully consider the questions in the technical solicitation process and develop a better way to measure and assess whether projects meet the TPB's goals and aspirations.

Currently, the technical submissions questions appear to be the same as in the past, even though this plan is meant to be different. In order to ensure you have useful information to assess how individual projects and the overall LRTP meet the TPB's goals and aspirations, questions should be revised.

One problem is that the questions do not allow for a sense of scale. A project that creates new transit-only infrastructure, for example, would be identified as meeting the TPB's goal of expanding transit, but so would a highway expansion project that includes SOV lane expansion as well as an HOT lane available for use by both cars and transit vehicles. While these answers may be factually correct, the scale and impacts of such projects are very different.

By creating more nuanced methods for identifying the impacts of projects, as well as adding a question related to how projects contribute to the TPB's resolution on GHG reductions, the TPB can gather more meaningful data that will allow for assessing project submissions in this LRTP and progress toward its goals in LRTPs over time.

Additionally, I suggest that the TPB not only engage in jurisdiction-and-agency meetings to discuss priorities and hopes for project submissions, but that the entire TPB engage in a discussion prior to the start of submissions. Doing so after the submission process will be too late.

Thank you again for your work.

Sincerely,
Kacy Kostiuk
Takoma Park, MD

Marcela Moreno

From: Bill Pugh <bill@smartergrowth.net>
Sent: Tuesday, March 14, 2023 11:58 AM
To: TPBcomment
Cc: Stewart Schwartz
Subject: Comment for 3/15 TPB board meeting

Dear TPB board members,

The Coalition for Smarter Growth asks that the public be able to watch the three late March workshop meetings of TPB board members on Visualize 2050.

CAC members have also made this request. But were told by TPB staff that they would not be open to the public or CAC members to watch.

These meetings are a critical opportunity for the public and stakeholders to understand the projects and issues being considered by TPB board members and agencies, so that they can provide informed comments during this critical phase of the process. Making these meetings open to the public is also important for a transparent zero-based budgeting process.

Thank you for your consideration,

Bill Pugh, AICP CTP | Senior Policy Fellow
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