

June 18, 2024

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

Re: Remove the I-495 Southside Project from Visualize 2050

Dear Chair Henderson and Members of the TPB,

We urge you to support the motion from Prince George's County to remove the I-495 Southside Express Toll Lanes project from Visualize 2050 and the list of project submissions to the air conformity analysis. Please consider the following impacts the project will have on our environment, health, and future.

Climate and Air Quality Impacts. The 2021 Climate Change Mitigation Study conducted by the Transportation Planning Board (TPB) revealed that the Greater Washington, D.C. region needs to achieve a 15-20% reduction in per capita driving (light-duty vehicle miles traveled) below the 2030 baseline forecast, as outlined in the current transportation plan in order to reduce transportation emissions 50% by 2030 relative to 2005 levels. The Southside Project would increase vehicle miles traveled (VMT) and move us further from reaching the Transportation Planning Board's greenhouse gas goals. Additionally, the Washington D.C. region is in non-attainment of the 2015 ozone National Ambient Air Quality Standards (NAAQS). Ozone formation is traceable in significant part to emissions of nitrogen oxides ("NOx"), which are released by the combustion of gasoline and diesel fuel in on-road vehicles. Increased vehicle traffic from the Southside Project would make it more challenging for the region to achieve compliance with these standards and would further burden communities living near the Beltway with increased air, water, and noise pollution.

**Future of Metrorail Risk.** The toll lanes would put the extension of Metrorail on the Woodrow Wilson Bridge at risk by taking space on the Wilson Bridge reserved for a future extension of Metro's Blue Line. The Blue line extension would serve Rosslyn, Georgetown, downtown D.C., Navy Yard, Buzzard Point, St. Elizabeths, Forest Heights, Oxon Hill, National Harbor, and Alexandria. It is highly unlikely that the right of way can truly be preserved for future Metro given that the Virginia Department of Transportation (VDOT) has acknowledged that large toll lane

ramps may be built and then need to be removed or reconstructed for Metro extension. Additionally, the toll lanes expansion as a public-private partnership (P3) agreement would present further barriers to metro extension, especially given that most P3 models involve long term arrangements. As stated by Prince George's County Department of Public Works and Transportation: "While on the surface it can be said that a rail option will not be precluded practically speaking, once a P3 contract has been executed and toll lanes are in operation, the conversion would be presented with new obstacles that will likely be insurmountable."

The project will shift traffic bottlenecks and fail to fix congestion. It is well documented that highway expansion is not a solution to traffic congestion due to induced demand.<sup>1</sup> It is very likely that the Southside Express project would move the traffic bottleneck on the Beltway in Virginia into Prince George's County. VDOT has not studied the impacts of induced traffic from the proposed project on I-295, Route 210, Route 1, Telegraph and Van Dorn, and other roads. Additionally this project would likely generate more traffic on local streets that would have a negative impact on communities in the region.

The Southside Project is a false solution for transit riders. The Southside project is categorized as a toll lanes project for Visualize 2050. Any promises for better bus service appear to be more of an afterthought and not a guarantee. And, as stated above, the project would harm transit by creating a major barrier to extending the Blue line of Metro. The hundreds of millions of dollars used to expand the Southern portion of the Beltway that would harm local communities with more pollution and traffic would be better used if it were all spent on increasing access to more affordable public transit, bike, and pedestrian infrastructure and transportation demand management options.

Please vote to remove the I-495 Southside Project from Visualize 2050. All Beltway and I-270 toll lane expansions should be removed from the region's long-range plan and the hundreds of miles of additional highway expansion projects in the plan should be re-evaluated in light of our climate goals. Better public transit, including the Blue line extension of Metro; transit-oriented development; and Transportation Demand Management are solutions that will actually reduce congestion while cutting climate pollution; improving public health; and increasing access to jobs, education, and healthcare for residents across the region.

Sincerely,

Rebekah Whilden

Senior National Campaign Advisor, Sierra Club

<sup>&</sup>lt;sup>1</sup> https://www.sciencedirect.com/science/article/abs/pii/S0967070X18301720