

The Draft EIS and other independent analyses have revealed that this project would be bad for local ratepayers, Maryland tax payers, local community members. In March, the Washington Suburban Sanitary Commission (WSSC) estimated that it would cost \$2 billion to move water and sewer pipes to make way for the project, more than double the original estimate from MDOT ([Washington Post](#)). The state has consistently refused to acknowledge who will foot the bill, and WSSC has expressed concerns that this could raise their ratepayers water bills.

Despite Gov. Hogan's claims that the proposal will cost Maryland taxpayers nothing, the DEIS admits that upwards of \$1 billion in state subsidies might be needed to complete the project ([Washington Post](#)). Other P3 projects, such as the Purple Line, have run over budget and the developers have demanded state funds to keep the project alive. Currently the Purple Line is \$755 million over budget, and developers have threatened to walk away from the project unless the state agrees to pay those expenses. The DEIS acknowledges that under high cost and high interest rate scenarios, every single alternative will run a deficit between \$482 million to \$1.01 billion (Table 2-6). It remains unclear how the state intends to reconcile this fact in light of Purple Line cost overruns.

Local communities will be hit the hardest by this proposal. The DEIS acknowledges that 1,500 properties will be negatively impacted, and up to 34 homes will have to be bulldozed completely (Table ES-2). The project will disproportionately impact local communities, particularly low income communities and communities of color. They will be stuck with all of the impacts, such as increased noise and air pollution, increased risk of flooding and water pollution, all while wealthy out-of-town commuters reap the rewards. The proposal will also impact dozens of community resources such as schools, parks, hospitals, local business and more.

There are numerous environmental concerns with this proposal. The DEIS acknowledges that the project will lead to increased particulate matter, carbon monoxide, ozone, nitrous dioxide, and greenhouse gas emissions in local communities (Section 4.8.3) yet it fails to adequately address and mitigate these concerns. The entire goal of the project is to increase highway capacity, leading to more vehicles on the road and increased greenhouse gases for decades to come yet climate change is mentioned only once in the main body of the 350 page report and makes no attempt to mitigate the increased greenhouse gas emissions. This project moves Maryland drastically backwards in attempts to reduce climate pollution at a time when action is needed most.

Over 550 acres of new impervious surfaces will be added, drastically increasing stormwater runoff, pollution, and flash flood risk for local communities (Table 4-29). Nearly all of the stormwater mitigation efforts will need to be done off site of the project, and often even outside the impacted watersheds further burdening local communities and their watershed. Creeks such as Rock Creek, Sligo Creek, Northwest Branch, and more will all be hurt. Over 50 acres of wetlands could be impacted, further worsening stormwater impacts and negatively impacting wildlife. Nearly 30 miles of local streams, creeks, and rivers would be negatively impacted in total (Table ES-2).

Dozens of local parks- Greenbelt Park, the C&O Canal, Cabin John Regional Park, Indian Spring Terrace Local Park, Rock Creek Stream Valley Parks, and many many more (Table 4-5)- will be negatively impacted. They will lose precious greenspace to pavement and park features such as trails and basketball courts will be destroyed (Appendix D). In total, 86 acres will be impacted on National Parks alone, and many more in regional and local parks. In total, approximately 1,500 acres of forest canopy will be removed. And 155 acres of area of sensitive species review will be impacted, hurting wildlife, increasing habitat fragmentation, and harming endangered and threatened plant species (Table ES-2).

From the start, the DEIS review process has been deeply flawed. From day one, the state has favored an extensive-build option. Every Environmental Impact Statement is required to include a "Statement of Purpose and Need," a justification of why the proposed project should be built. This project's purpose and need includes language to ensure that the only project that could get approved are massive highway expansions that have the potential to create revenue for private corporations. Thus, all of their proposed and studied alternatives include nearly identical impacts to the environment and local communities (Table ES-2). This language intentionally allows them to exclude and not examine true alternatives to massive highway expansion- such as the expansion of transit options, traffic management, route alternatives, and more. All of these would likely have a lower cost, with fewer impacts to local resources, and still reduce traffic. But there's no way to know for sure since they are excluded from examination in the DEIS.

The DEIS openly admits to now knowing the full and true impacts of this project. The full extent of impacts will simply be figured out along the way. On top of that, this document is collectively over 18,000 pages. And there were only 90 days to fully review this document and draft comments with opinions on it.

One of the big questions surrounding this project remains, do we even need this? Even if we were to accept all of the impacts- harms to parks, water and air quality, communities, cost to taxpayers, and more- there is simply no evidence that this project will be needed once we recover from the COVID-19 pandemic. Experts agree that there is much uncertainty regarding traffic and congestion in the years to follow COVID stay-at-home orders. Work from home/telework, staggered commute times, and more will all likely impact traffic in the region. Yet the DEIS simply makes a passing reference to this fact- one short paragraph in 18,000+ pages. This is a wholly inadequate examination of something that will likely impact this project in its entirety. A recent study by the Maryland Transportation Institute at the University of Maryland found that only a 5-15% reduction in cars on the road during rush hour would virtually end congestion, making any expansion pointless ([Maryland Matters](#)). If nothing else, we should fully examine and study whether this project will even be viable if even a small percentage of people switch to telework.

Even without COVID-19, numerous studies show that expanding highways almost never result in the desired reduction of traffic and congestion. Induced demand leads to highway expansion

projects being back to pre-build traffic levels in as little as 5 years. Many studies have shown that building more highways can actually make traffic worse ([Wired, Transportation for America](#)). Finally, nearly all of the benefits listed in the DEIS for traffic speed and travel times only benefit those willing to pay the tolls. In some sections of the highway, the DEIS admits that average travel speed will actually go down for those in the toll-free lanes during peak times (Table 3-5).

In conclusion, this project is terrible for local communities and the environment. The DEIS is drastically flawed with an insanely short review time. And we probably don't even need it and it won't really work.