Maryland Sierra Club
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August 26, 2018

Lisa B. Choplin, Director
Maryland Department of Transportation
State Highway Administration
I-495 & I-270 P3 Office
707 North Calvert Street
Baltimore, MD 21202

Dear Director Choplin,

Re: I-495 and I-270 Managed Lanes Study: Purpose and Need, Screening Criteria, and Preliminary Range of Alternatives

We are submitting these public comments on the I-495 and I-270 Managed Lanes Study on behalf of the Maryland Chapter of the Sierra Club, the volunteer-led, community-based environmental organization with more than 71,000 members and supporters in the state. The Sierra Club is America's oldest and largest environmental grassroots organization and has more than 3 million members and supporters nationwide.

While the State Highway Administration's recent public meetings focused on discussing 15 preliminary alternatives, we are commenting first on the statement of purpose and need -- introduced since last spring's scoping open houses -- as it sets the stage for the screening criteria and shapes the preliminary range of alternatives that have been proposed.

Purpose and Need
The current purpose and need statement is based on flawed assumptions and inadequately addresses the needs of Marylanders. Any purpose and need statement for a proposed project of this magnitude needs to recognize that the state's transportation system should be determined by what Maryland residents want for the future and not what is expedient based on what has been done in the past. An ever-increasing number of people today want alternative ways of getting to where they need and want to go - especially alternatives that pollute less, don't encourage more driving and sprawl, and generally are better for their health and the environment.

The statement of purpose needs to add a critical constraint -- *that the solution must enable us to reduce greenhouse gas emissions*. Transportation is now the largest source of greenhouse gas emissions in the state, and in 2016 the Maryland General Assembly reauthorized Greenhouse Gas Reduction Act requiring that the state reduce

overall carbon emissions, including transportation sector emissions, 40% by 2030. It also is critically important this constraint be included in the purpose and need statement as the state pursues its goal of working with neighboring states to find collaborative solutions to limit transportation pollution and to develop a clean transportation economy through partnerships such as the Transportation Climate Initiative.

The purpose of the study should be to "develop a travel demand management solution that addresses congestion, improves trip reliability on the I-495 and I-270 ***corridors*** within the study limits and ***both*** enhances ***and integrates*** existing and planned multimodal mobility and connectivity.*"* The word *"corridors"* should be added to ensure there is going to be a realistic study of all practical alternatives on those corridors and not just the option to expand toll lanes on the highways. Adding the word "*integrates*" would make the study comply with the 2035 Maryland Transportation Plan (under Managing Congested Infrastructure) that states, "For the long term, Maryland's congestion solutions must integrate highways and transit with land-use decision making, so that the public and businesses have multimodal options that meet their needs." The state's draft 2040 Transportation Plan provides similar guidance to improve multimodal connectivity and accessibility.

Troublesome and biased terminology in the current purpose and need statement that should be removed includes "accommodate …long term traffic growth" and "provide additional roadway travel choices." Such terms incorrectly presume highway expansion is the only or best option to handle the expected increase in the number of residents and visitors in the future. Similarly, trains can handle much of the anticipated increase in freight travel vs. expanding highways, and getting more people onto transit, sharing rides, working from home and living near work would lessen traffic so local freight delivery can use existing roadways.

Screening Criteria

With the transportation sector now the leading source of greenhouse gas emissions in the state, the proposed screening criteria must include how each alternative would impact the state's ability to meet its legally-mandated requirement to reduce economy-wide greenhouse gas emissions 40% by 2030 as discussed above.

The criteria also must include a determination of each alternative's impact on residents' health from air pollution since the alternatives that would add lanes would encourage more people to drive because they believe their travel times would lessen. Gas and diesel-powered vehicles on our roads are a major source of toxic emissions including benzene, nitrous oxide, sulfur dioxide and carbon monoxide that are linked to cancers, diabetes, heart disease, asthma, emphysema and other respiratory diseases. The criteria should also factor in how the alternatives would impact overburdened and undeserved communities that breathe in a disproportionate amount of air pollution near busy roads or have limited access to transportation options.

It is critical that the study also include criteria that monitor each alternative's impact on the number of properties of residents, businesses and communities that would be directly affected by construction of the expanded highways including it exits and entrances. An additional criterion for evaluating alternatives should be evaluating congestion that occurs when vehicles exit that alternative method of transportation. Even if cars were to spend less time on managed lanes, they still would become stuck in traffic when attempting to exit onto local roads that already are congested. However, transit

alternatives, especially those on rail or with dedicated lanes, would not have this problem.

The criterion that the alternatives have the potential to be financially self-sufficient inappropriately favors alternatives that would be popular with private companies seeking to profit from the tolls from adding managed lanes. This should be altered to ensure that the criterion be to serve the public interest and reduce traffic rather than allowing private companies to build and operate toll lanes to maximize their profits.

Preliminary Range of Alternatives

We are strongly opposed to the proposal to add 4 toll lanes each on I-495 and I-270, and urge MDOT to instead adopt comprehensive, clean, equitable, and modern alternatives to relieve traffic, most of which are not among the 15 preliminary alternatives listed.

Multiple studies show expanding highways encourages more driving and traffic, stimulates sprawl[1], and that money can be better spent on needed clean transportation solutions that will offer lasting relief vs. expanded highways that often become congested again in as little as three to five years. Increasing the number of lanes and allowing a greater volume of traffic would also increase greenhouse gas emissions and air pollution, exacerbating the impacts of climate change and increasing the number of people suffering from toxic air pollution that is hazardous to human health.

The pollution from tailpipes especially affects those who live or work near busy roads, particularly in our most vulnerable communities. Expanding highways would also be an injustice to local homeowners and business persons who would be displaced by this construction. Another problem is that the expanded highways would include toll lanes only the wealthier can afford, as seen by similarly managed lanes in Virginia with tolls that exceed $40 during peak traffic.[2]

We urge you adopt a combination of the following (but by no means exhaustive) alternative solutions that would relieve traffic while supporting efforts to transition to a clean, equitable, and 21st century transportation system:

- Add 1 or 2 reversible lanes for High Occupancy Vehicles (HOV) and express buses or BRT;
- Run express buses or BRT on highway shoulders;
- Expand the MARC Brunswick line between Frederick & Washington DC to provide all day service in both directions on weekdays, evenings and weekends;
- Build a monorail between Frederick & Shady Grove or Bethesda Metro;
- Build a comprehensive Bus Rapid Transit network including BRT on MD 355 (Bethesda to Clarksburg);
- Make an existing lane on both highways reversible during peak periods;
- Create more interconnected bike paths;

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[1] The National Academies of Science, Engineering, and Medicines. *Closing the Induced Vehicle Travel Gap Between Research and Practice.* April 2018. Available at: https://trrjournalonline.trb.org/doi/abs/10.3141/2653-02

[2] Virginia Department of Transportation. *66 Express Lanes Inside the Beltway Usage Update Statistics following Tuesday a.m. rush hour.* December 2017. Available at: http://virginiadot.org/newsroom/northern_virginia/2017/66_express_lanes_inside121513.asp

- Add more “park and ride” locations;
- Incentivize businesses to offer ride-sharing programs or van pools for their employees;
- Encourage more telecommuting and other work from home;
- Encourage more use of Metrorail and Metrobus;
- Apply Transportation Systems Management and Travel Demand Management strategies;
- Increase the frequency of the Purple Line and review how much it will reduce traffic on I-495;
- Build a straightened Corridor Cities Transitway linking Clarksburg & Shady Grove;
- Offer reduced prices on transit for low and moderate-income individuals;
- Encourage more transit-oriented development that includes affordable housing;
- Educate the public on clean transportation alternatives.

In summary, we specifically request answers to the following questions:

- Will the screening criteria for the environmental impacts of the alternative proposals include assessing the amount of climate-disrupting greenhouse gas and toxic air pollution that would be emitted compared to the no-build alternative?
- Will the screening criteria assess how much residential displacement would occur with each alternative?
- When will SHA tell the public what existing residential, commercial and medical buildings will need to be removed to make way if 4 lanes are added each way on I-495 and I-270?
- How would SHA mitigate the increases in air, water and noise pollution from the increased number of cars that inevitably would use the widened highways?
- Are all the alternatives proposed now in the state’s long range 2035 or 2040 transportation plans? If not, that indicates exceptions are being made, so MARC expansion should be added to the list of alternatives to be studied.
- Transit serves low income and an increasing number of young workers who don’t own cars. How would that sizable and growing portion of the populace be served if only managed lanes are built?

As the study process continues, we encourage you to hold multiple, inclusive public engagement sessions that allow Marylanders to provide input into this process. We request that these sessions be advertised in multiple communication channels throughout the state and communicated at least one month in advance of each session. As much as possible, these public engagements sessions need to be accessible via public transit and held during evening hours or weekends.

We hope that you will take our comments into serious consideration to ensure Maryland can become a national leader in creating a 21st century transportation system that relieves congestion, limits pollution, and creates thriving economic centers and vibrant spaces to live, work, and recreate.

Sincerely,

Brian Ditzler
Executive Committee Chair
Maryland Sierra Club

Lindsey Mendelson
Transportation Representative
Maryland Sierra Club