



May 3, 2021

To: Transportation Planning Board, Metropolitan Washington Council of Governments

From: Sierra Club, Maryland Chapter

Subject: Sierra Club, Maryland Chapter Comments on Visualize 2045 Plan Update

We offer these comments on the **Visualize 2045 Plan Update**. We want to highlight positive aspects of the plan as well as some serious concerns.

First and foremost, we believe that climate must be a central consideration for the Long Range Transportation Plan, and the plan should be demonstrated to put the region on track to meet its climate goals. The Metropolitan Washington Council of Governments (MWCOG), as well as its jurisdictions, have all adopted climate goals. Transportation is now the largest sector contributor to greenhouse gas (GHG) emissions. While we appreciate MWCOG's leadership in developing multi-jurisdiction climate goals, it is critical that the Transportation Planning Board (TPB) take the next step and actually integrate those metrics into the Long Range Transportation Plan.

The creation of a Long Range Transportation Plan is built on the idea that coordinated planning is required to ensure that transportation plans meet the needs of the region. The TPB has created a directive that TPB member agencies "*prioritize investments on projects, programs, and policies to reduce greenhouse gas emissions, prioritize the aspirational strategies, and achieve COG's land use and equity goals*". If climate is not a key criterion for whether a project is included in the Visualize 2045 Plan, it calls into question MWCOG's commitment to climate, or its ability to execute on that goal.

We recommend that projects which threaten progress on our climate goals be removed from Visualize 2045. Specifically, we urge you to remove the "I-270 TOLL LANES" and I-95/495 Toll Lanes" that are part of the MDOT Managed Lanes project.

Sierra Club and many organizations have pointed out the significant increase in climate emissions that would come from this project and other highway expansions in our region. Maryland Department of Transportation (MDOT) erroneously argued that highway expansion would reduce GHG emissions. These claims have been debunked. MDOT, in its pre-solicitation report for the Managed Lanes project, cited research by Dr. Stuart Batterman to attempt to



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argue that lane expansion would result in lower carbon emissions. As reported in the Baltimore Sun, Dr. Batterman wrote a letter explicitly contesting that misinterpretation.¹

In addition to the climate concerns, the I-495/I-270 toll lane expansion poses other serious environmental threats, and major process concerns. Sierra Club and partners wrote 200 pages of [comments](#) on the Draft Environmental Impact Statement, documenting expected stormwater runoff, loss of parkland, impact to historic places, and air pollution. Further, we document the unprecedented refusal to share underlying data used in the traffic models.

Sierra Club requested the origin-destination data and were denied multiple times or asked to pay \$300,000. The LRTP is supposed to include a robust public input process, but this is not possible when essential data has not been shared with the public. We've attached those comments in full, and you can find them at <http://bit.ly/495270DEIS>. Currently, one key agency, Maryland-National Capital Parks and Planning Commission, has refused to concur with the recommendations of the DEIS, the Navy sent a letter refusing to give up land, and several federal agencies have raised serious concerns. There are many critical aspects of the project that have not been shared with the public and significant impact analysis that has not been undertaken but pushed off to a time when the public will not have an opportunity to comment or request mitigation measures. The analysis of GHG emissions due to the project is one of those areas not adequately analyzed.

To include the project, especially the Beltway portion, in the region's long-term plans, despite these concerns, would be in conflict with many of the values and goals the TPB has adopted.

MWCOG has shown significant leadership on climate change, and this presents a critical moment to continue that progress, rather than backslide.

Thank you for your consideration.

Sincerely,
Josh Tulkin
Director, Sierra Club, Maryland Chapter

¹ "Researcher says Hogan administration wrongly cites study to suggest highway expansion will cut air pollution", June 4th, 2019.

<https://www.baltimoresun.com/news/environment/bs-md-highway-pollution-20190604-story.html>