

## Sierra Club Verbal Comments, SDEIS Public Comment Hearing, November 1, 2021

Good afternoon. My name is Josh Tulkin. I'm the director of the Maryland Chapter of the Sierra Club offering these comments on behalf of our 70,000 members and supporters. We appreciate this opportunity to preview the serious deficiencies and problems we've identified in the SDEIS.

First, the report introduced significant new information, new traffic models, design features, and environmental impacts in a confusing 8,000-page document, difficult to navigate, with only a 45-day review period. Our organization, and many others, including legislators, have requested an extension. We have not heard back anything from MDOT yet, and we find that rather disturbing and harmful to the intended process. Secondly, the myth continues to be perpetuated that these toll lanes would be offered at no cost to the taxpayers.

The project is being subsidized by the taxpayers, and it seems clear in much of the fine print, the financial risk that would be taken on by the taxpayers through this process. Third, it's clear the sole beneficiaries of this project are the wealthy. While in the beginning, MDOT appeared to argue that all drivers would benefit from traffic reduction, the newest data demonstrates that it is largely the people who can afford the toll lanes that will receive the benefits, while there is very little clear benefit to people in the general-purpose lanes. However, there will be significant environmental and health damages that everyone will be sustaining in order to build the toll lanes that will just benefit the few -- significant stormwater, potential flooding issues, loss of 500 acres of trees, and impacts to endangered species, just to name a few.

A month ago, MDOT said that HOT lanes provide reduced congestion, trip reliability, and improved safety. But what they failed to disclose, these benefits are only available to those who can afford it, creating an inequitable two-class system. Buried in the fine print of the traffic studies is the fact that the general-purpose lanes will actually be less safe because of the increased congestion, greater concentration of 18-wheeler trucks, and a loss of the left lane shoulder.

Further, the SDEIS failed to disclose the real cost and impacts of this project. According to a national expert traffic modeler, the SDEIS greatly underreports the congestion and bottlenecks this toll plan would cause. And this was done deliberately, and the traffic model calls MDTA's toll setting exercise "theater to mollify a skeptical public." It is very clear as this project goes on the need for key information to allow the public to properly evaluate whether the environmental impacts and health impacts and noise impacts are worth the limited benefit that a few wealthy people can afford.

Thank you very much.

### ***Closing below not delivered due to first timer sounding:***

The SDEIS fails to disclose these and other significant impacts, and therefore fails to carry out the fundamental public disclosure purpose of NEPA. As Sierra Club along with over 40 other groups wrote in a letter on the day the SDEIS was issued, 45 days is an inadequate comment period. This SDEIS is a flawed environmental document that requires close technical scrutiny that the limited 45-day comment period does not afford. To fulfill the public-serving purpose of NEPA, the comment deadline for this SDEIS must be extended. Thank you.