May 14, 2019

The Honorable Peter Franchot
Comptroller of Maryland

Dear Comptroller Franchot:  Re: P3 authorization vote: Oppose

I am writing on behalf of the Neighbors of the Northwest Branch of the Anacostia River, a 501(c)(3) nonprofit volunteer watershed organization with members in Montgomery and Prince Georges counties. We have been working since 2003 to restore the health of the 19-mile long Northwest Branch of the Anacostia River. We want to see this urban treasure safely enjoyed by wildlife, our families, and generations to come.

As a member of the Maryland Board of Public Works, you will soon vote on the Maryland Department of Transportation (MDOT) plan to expand the beltway and I-270 by adding from two to four toll lanes to both, using several P3 contracts. In our view, approval of this huge project would be a huge mistake. The proposal does not protect the best interests of Maryland’s citizens—neither their lives nor their wallets. It is unworthy, actually, of such a forward-looking state as Maryland.

We are deeply concerned that MDOT wants to proceed without benefit of a completed assessment of the effects that construction and operation of the lanes would have on the Northwest Branch and on the other streams and parks that make Montgomery and Prince Georges counties wonderful places to live and work. The health of these streams, including the Northwest Branch, is fragile, dependent on the surrounding watersheds. Untreated runoff from roads such as the beltway contribute greatly to its ill health, and runoff has become all the more problematic because our area is predicted to receive even more rain as the climate warms. Obviously, degraded streams produce a degraded Potomac River and Chesapeake Bay, and ultimately have negative financial and quality of life impacts on the State of Maryland.
Further, we know that we have little time to make major changes in our society to address a climate emergency already upon us. The Montgomery County Council recognized this in 2017, and increased its emissions reductions goal to 100% by 2035, with an interim goal of 80% by 2027. The resolution includes ALL sources of greenhouse gases. And right now, motor vehicles are our largest source of emissions. Every additional lane mile of roadway, according to a 2007 study by Sightline Institute, increases net CO2 emissions by more than 100,000 tons over 50 years. And while we know that we have “no carbon budget left to avoid catastrophe,” this project adds potentially 236.1 more lane miles (not counting interchanges), which would result in some 23,640,000 additional tons of CO2 released in our atmosphere. How is this addressing our urgent climate goals?

We also know from decades of research and our personal experience in Montgomery County with I-270 expansion and construction of the Intercounty Connector that adding more lanes is not a long-term solution to moving people. At a recent meeting, Mr. Slater told us to expect another million residents in this area. Why then would we go to such great expense and environmental sacrifice to build a system that enables a limited number of people to bypass the ever more severe congestion miring the rest of the population? Why not build a scalable system that can handle this million and the next one, and that serves everyone? Start with all day service for existing VRE and MARC. Add light rail lines as, for instance, Denver has done, or Bus Rapid Transit on existing roadways. Serving more people can then be addressed by simply lengthening the trains or adding more buses, not destroying our state’s environmental assets.

As for cross-county commuting, what transportation relief will the completed Purple Line provide? Shouldn’t we find that out before considering such a risky upheaval? But the selection criteria for this project defined transit out of the possible alternatives.

We are sensitive to the argument that nearly everyone prefers to drive--and will, if provided the lanes. In fact, the Virginia experience is that the toll lanes have resulted in ever more cars on the road because those who carpooled previously can now, for a price, drive alone. People who used what little transit there is now might well choose to drive. That is how induced travel works. Our state should aim to shift the incentives toward forms of mass transit because not only does an individual on a train take up less space than in a car, an electrified train carrying 1000 people is much better for our air, water, and climate than those same people in 1000 cars, even if some are electric.

A former governor who wrestled hard with the question of building the Intercounty Connector to solve mobility problems ultimately came to this conclusion:

“We can’t think we can continue to solve traffic and congestion problems by building more highways and adding more lanes. We are losing all of our open space and doing immense damage to the climate. It is so unneeded.... And when I looked into the financing, think what we could have done with $4 billion.” -- Governor Glendening
The proposed set of P3 highway expansion projects would lock us into a fossil fuel transportation future while at the same time destroying another 300 acres of CO2 absorbing trees—when we cannot afford to lose another day in reducing our emissions. Maryland needs a long-term transportation plan that protects its environment, our quality of life, and our financial well-being.

**We respectfully urge you to oppose moving forward with this project.** Approval is at the very least, premature.

Sincerely,

Laura Turbe, President

---


ii The study factors in emissions from highway construction, allows for 10% more electric vehicles each year, and gives credit for several years of lowered emissions from initially better traffic flow. [http://www.jtc.sala.ubc.ca/reports/analysis-ghg-roads.pdf](http://www.jtc.sala.ubc.ca/reports/analysis-ghg-roads.pdf)

iii Dr. Michael Mann, climate scientist, quoted in the report on the Montgomery County climate resolution cited above.

iv Reflect on the lessons of the Intercounty Connector. It cost $4 billion with interest, locked up a good portion of our federal transportation money ([https://bethesdamagazine.com/bethesda-magazine/september-october-2013/the-intercounty-connector/](https://bethesdamagazine.com/bethesda-magazine/september-october-2013/the-intercounty-connector/)), cut through communities, and crossed five stream valley parks, wiping out 88 acres of parkland and more acres of trees. In 2016, after the tolls were lowered, the State Highway Administration declared it a success at relieving congestion. If that is so, why are we now, just 3 years later, considering additional lanes on the beltway? See: [https://patch.com/maryland/rockville/new-data-offer-conclusive-proof-icc-has-reduced-area-traffic](https://patch.com/maryland/rockville/new-data-offer-conclusive-proof-icc-has-reduced-area-traffic)