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Friends of Sligo Creek has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the Maryland Department of Transportation (MDOT) for the I-495/I-270 toll lanes project, and we write to renew our opposition to this proposal. We support the “no-build” option and categorically oppose any toll lanes. We also write to express our disappointment at the failure of the SDEIS to address basic environmental impacts or seriously consider viable alternatives. This has deepened our ongoing concern that the process for advancing this proposal has been rushed and inadequate, and that plans to expand the project east along the Beltway and over the Sligo Creek watershed are likely to be revived and proceed in a similar fashion.

The SDEIS reinforces both that the project will cause significant environmental harm, and that it will not effectively address the problem it is supposed to solve. The tables in Appendix A of the SDEIS illustrate that improvements to traffic congestion in most segments are projected to be negligible, and in some segments it is estimated that commute times will actually increase. Overall, the SDEIS estimates a reduction in traffic delays of just 3 or 4 minutes per commute, a barely noticeable amount of time, and a poor return on a massive investment of tax dollars with potentially profound negative impacts on the surrounding communities and natural environment.

The SDEIS fails to consider many basic environmental issues, but those it does address are gravely concerning to Friends of Sligo Creek. For example, according to details in Appendix C, it is estimated that only about half of stormwater runoff can or will be managed onsite. A lack of clarity on how all stormwater will be treated is unacceptable. In addition, the toll lanes will impact 15 parks, and a total of over 36 acres of parkland will be affected, with a potential loss of 500 acres of forest canopy. Over 1,200 trees would be removed in 3 national parks.

These environmental impacts are bad, especially for a proposal with so little projected benefit, but what is omitted or left unaddressed by the SDEIS is equally troubling. The analysis of many essential environmental impacts has been left for a proposed future Final Environmental Impact Statement (FEIS). Thus, the SDEIS fails to provide a final Environmental Justice analysis, and it includes only a rudimentary analysis of greenhouse gas emissions and other pollutants likely to result from increased car traffic. Also deferred to the proposed FEIS is analysis of the impact of the project on wetlands and floodplains. These

are basic environmental impacts that should have been included, and their absence, or postponement, does not inspire confidence that MDOT is taking environmental concerns seriously enough.

An analysis comparing the impact of the proposed toll lane project with potential alternatives is also absent. For example, during the last year and a half, as a result of the COVID pandemic, it has become clear that policies encouraging telework can significantly reduce traffic. An assessment of the potential environmental impact of increased telework as compared to the construction of toll lanes would have been instructive, though it is welcome that this kind of analysis is according to the SDEIS “ongoing”, as presented in Appendix B.

Because many environmental impact analyses have been deferred, this SDEIS is incomplete at best. We encourage MDOT to ramp up its ongoing analysis of alternatives to highway construction like telework. Nonetheless, the analysis that the SDEIS does provide, detailing the impact on trees, parks, and stormwater, and the negligible benefits the proposal is projected to produce, have intensified our opposition to the construction of toll lanes.

It is clear to Friends of Sligo Creek that there are ways to reduce traffic congestion that will have a much less harmful impact on our environment, including our creeks and streams, than building toll lanes and increasing the number of cars on our highways. Friends of Sligo Creek emphatically supports the “no-build” option, and opposes any construction of toll lanes.

Friends of Sligo Creek, or FOSC, is a nonprofit community organization dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed.

Sincerely,

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