



SIERRA CLUB

MARYLAND CHAPTER

P.O. Box 278
Riverdale, MD 20738

National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002

March 25, 2024

Chair Henderson and members of the TPB:

I am submitting these comments on behalf of the Maryland Chapter of the Sierra Club regarding Visualize 2050, the National Capital Region Transportation Plan (NCRTP). We call on the Transportation Planning Board (TPB) to provide accountability to your adopted goals, targets, and policy framework. Projects that undermine the body's established regional goals should be removed before moving forward with air quality modeling.

In 2022, the Transportation Planning Board adopted a greenhouse gas (GHG) emission reduction goal of 50% of 2005 levels by 2030. We applaud this vision and are pleased to see multiple Bus Rapid Transit projects and MARC service improvements included in the Visualize 2050 project summary table. However, we are concerned that the 900 lane miles of new and expanded highways also included would greatly increase the region's GHG emissions due to the well-documented phenomenon of induced demand. Additionally, we are concerned that the draft plan proposed only half as much spending for projects that would reduce GHG emissions as compared to the amount for road expansion.

We urge you to remove all projects that would expand I-495 and I-270 with toll lanes and conflict with the TPB's goals including:

- I-495/I-270 (West Spur) Express Toll Lanes Widening: I-270 to George Washington Memorial Parkway
- I-270 Express Toll Lanes Widening: I270 Spur to I-370
- I-495 Southside Express Toll Lanes (SEL): Springfield Interchange to MD 210.

These projects are not consistent with TPB's policy framework and undermine progress towards meeting climate goals. Additionally, the I-495 Southside Express Toll Lanes project would block a future extension of Metro's Blue Line from being built over the Woodrow Wilson Bridge. Decisionmakers ensured the Woodrow Wilson Bridge would be able to carry rail and currently there is a WMATA-led study to extend the Blue Line. However, the Southside Express Toll Lanes would take away this space that was reserved for rail and create a strong incentive for Virginia to not support any Metrorail extensions using the Woodrow Wilson Bridge.

We are also concerned by the other following road widening projects that would fuel sprawl development patterns, add to VMT, and increase GHG emissions:

- Frederick Freeway (US-15) Grade Separation at Biggs Ford Road and Widening, North of Biggs Ford Road to I-270;
- Branch Ave (MD-5) Widening, US 301 to I-495; and
- Pennsylvania Ave (MD-4) Widening, I-495 to Woodyard Rd.

Currently, the plan anticipates only a 5 percent decrease in per capita vehicle miles traveled (VMT) by 2045, despite analysis showing that a 25-30 percent decrease is needed by 2050 to meet the TPB's climate target. Visualize 2050 should provide a scenario comparison that includes a 25-30 percent VMT reduction, supported by climate-friendly transportation projects and land use policies. TPB should factor in WMATA's Visionary Bus Network among these projects that would result in reductions of 14,570 metric [tons of greenhouse gas emissions](#) as a result of more high frequency service.

Additionally, we urge TPB to categorize projects by highway capacity, highway preservation, transit preservation, and transit capacity. This categorization system is currently used by the Baltimore Regional Transportation Board (BRTB) and will help distinguish between State of Good Repair projects and expansion projects that have an impact on our climate goals.

Thus, we urge the TPB to pause the development of Visualize 2050 to comply with the TPB's requirement set forth in Resolution R-19-2021 that the development of future NCRTPs should include conditions of multiple build scenarios for each project and an analysis of each scenario's impact on the region's adopted goals and targets. A more thorough analysis of the submitted projects is needed to verify claims that highway and road widening projects will reduce GHG emissions. This can be done in the extra year TPB has to comply with its federal deadline.

Thank you for your consideration.

Sincerely,

Jane Lyons-Raeder
Chair, Transportation Committee
Maryland Sierra Club