Highlighted Issues
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The Beltway Expansion project will have similar effects across the entire impacted region; however, certain areas may be more concerned about particular issues. Below is a list of potential concerns that may impact you. The bullet points describe possible arguments related to the current alternatives and offer strong avenues for commenting.

- The discussion of adverse environmental impacts could be considered inadequate.
  - Construction will likely disrupt wildlife habitat and cause segmentation of wildlife communities due to lack of crossing opportunities.
  - The study potentially does not adequately address the increase in greenhouse gases because they do not consider induced demand.
  - Construction of the project will impact a minimum of 1,434 acres of forest canopy (not including wetland trees).

- The construction may impact the historic nature of certain neighborhoods.
  - According to the Maryland-National Park and Planning Commission the DEIS has not adequately fulfilled the requirements under the Historic Preservation Act because they have not resolved the adverse effects that will occur on historic properties.

- Since the project goes through parkland, it will likely destroy already limited quiet spaces.
  - Montgomery County - The project will impact 16 Montgomery County parks.
  - Prince George’s County - The project will impact 16 Prince George’s County parks.

- The DEIS does not discuss how the project may impact property values.
  - While new roads may eventually increase property values, during construction, property values can decrease “at the rate of -$0.05 to -$0.50 per square foot of land per year and -$0.50 per square foot of structure per year.” (Siethoff, Brian & Kockelman, Kara, *Property Values and Highway Expansion: Timing, Size, Location, and Use Effects*, Transportation Research Record 1812(1), 191 (2002)).

- The DEIS was potentially improperly segmented because the I-495 & I-270 Managed Lanes Study could be argued to be fundamentally related to the I-270 from I-370 to I-70 study.

- The discussion of environmental justice impacts could be considered to be inadequate.
  - The air quality report only takes into account potential reduction in congestion and does not fully factor in induced demand. This means there could be increases of pollutants, i.e. carbon monoxide, in already disproportionately affected areas.

*This document is purely education and is not intended to provide specific legal advice.*
• The financial impact analysis neglected to include an analysis of the cost to relocate water lines and potential increases in affected ratepayers’ water bills.
  o Moving the water pipes for this project could cost up to $2 billion dollars. This cost would be placed on taxpayers, not the private partner, potentially leading to a 277% increase in water and sewer rates over the next 40 years, according to the Washington Post.

• There will likely be a considerable increase in noise pollution, with a minimum of 1714 noise receptors impacted.
  o Out of 133 noise sensitive areas, 17 will not have a noise barrier installed, 9 of which are located in EJ populations.
  o **Prince George’s County** - All of the areas in which noise abatement is not considered reasonable and feasible are in Prince George’s County.

• The evaluation of induced demand was possibly inadequate because the expansion may cause an increase in traffic on auxiliary roads.
  o The theory of induced demand, commonly referred to by the idea of “build it they will come,” is well documented. (See Melo PC, Graham DJ, Canavan S., *Effects of Road Investments on Economic Output and Induced Travel Demand: Evidence for Urbanized Areas in the United States*, Transportation Research Record, 2297(1), 163 (2012)).
  o Expanding the highways not may attract more drivers and lead to overall increases in air and noise pollution, but may result also in further congestion again in the not-too distant future. This calls into question the basic rationale for expanding the highways.

• Increased stormwater runoff may lead to increased flood risks for neighboring communities and increased pollution in regional streams/tributaries.
  o The project will create 550 acres of impervious surfaces, with limited on-site mitigation of the runoff.
  o The DEIS relies primarily on offsite rather than on-site mitigation.