

November 9, 2020

Honorable Gregory Slater
Secretary of Transportation
State of Maryland
7201 Corporate Center Drive
Hanover, MD 21076

Honorable Shannon Valentine
Secretary of Transportation
Commonwealth of Virginia
1111 East Broad Street
Richmond, VA 23219

RE: Public Comment for Maryland's I-495 and I-270 Managed Lanes Project, Virginia's 495 NEXT Project, and the joint I-495/American Legion Bridge Transit and TDM Project

Dear Secretaries Slater and Valentine:

The Greater Washington Partnership (the Partnership) commends your leadership, and that of Governors Hogan and Northam for close coordination to deliver a world-class transportation system for the Capital Region of Baltimore, Washington, and Richmond. The Partnership is a civic alliance of the leading employers in the region who employ more than 250,000 residents and are committed to making the region one of the best places to live, work, and build a business.

We write today to offer public comments supporting your continued forward momentum to deliver upon the promise of the historic Capital Beltway Accord announced in 2019, which requires successful completion, and close coordination, of Maryland's I-495 and I-270 Managed Lanes Project, Virginia's 495 NEXT Project, and your shared efforts on the I-495/American Legion Bridge Transit and TDM Project. These projects, once complete, will alleviate the Capital Region's number one vehicle bottleneck – the American Legion Bridge – and provide more reliable travel for those in cars and new mobility options for millions of residents, employers and visitor to access worksites, educational opportunities and our region's rich cultural assets. The replacement and expansion of this bridge has been a priority for the region's leaders for decades, but a solution has been elusive until now. We cannot let this opportunity pass us by and we support your efforts to get all three projects done as early as possible.

In 2018, the Partnership [released our principles for the development and delivery of a performance-driven toll network](#), which, if implemented, can reduce congestion and single-occupancy vehicle use by creating incentives for residents to divert trips to non-peak periods, increase the number of vehicle occupants, or choose public transportation and carpooling. As a result, congestion on those roadways is reduced, speeds are increased, transit use may rise, and reliability improves for everyone.

We provide the following comments that are cross-cutting for all three projects:

Toll planning should be coordinated regionally to deliver the benefits of greater mobility, accessibility, and reliability to all users of the transportation system

We are encouraged by the close coordination occurring between each of your teams, as well as with regional stakeholders, local elected officials, and residents. Strong regional collaboration and policy alignment is necessary across these projects to ensure the roadway tolling policies are complementary and seamless for residents. The close coordination must continue as these projects move forward.

Prioritize enhanced connectivity for the greatest number of people, not moving the most vehicles or generating the most revenue

Prioritizing people throughput enhances the efficiency of the roadway's carrying capacity, providing the greatest number of people reliable access to their destination. This is a long-recognized goal for the region's transportation investments, and we recommend that the Preferred Alternatives for these projects be the one that is most effective at moving the most people via multiple modes of transportation.

Enhance planning and investments to limit adverse impacts for historically marginalized communities, and proactively work to ensure residents of all income levels benefit from the tolling investment, including those without the financial means to afford the tolls

We must be intentional about limiting adverse impacts for communities of color and low-income areas. The Washington Post's article from October 17, 2020 titled [Maryland Beltway expansion might require moving part of historic African American cemetery](#) raises serious concerns. We cannot support a long-term investment that disproportionately impacts communities where most of the residents are minority or low-income, or Environmental Justice ("EJ") communities. At the same time, we strongly encourage both states to proactively improve mobility and access for EJ communities through these projects by making investments in high-quality public transportation options adjacent to or near the toll corridor, provide incentives that encourage HOV use, and/or provide vouchers or discounts to low-income residents. Additionally, these projects should reduce barriers to using the toll facilities that disproportionately impact those without access to the internet, bank accounts and credit cards—the assets often required to efficiently pay tolls and use the tolling technology. As you advance these critical projects, we also urge you to work to deliver quality jobs and community benefits, and to maximize job opportunities for Capital Region residents providing them access to strong workforce and apprenticeship programs with a proven track record for placing people in careers. Additionally, we support deployment of a robust Minority Business Enterprises (MBEs) and Women Business Enterprises (WBEs) contracting program.

Clarify how these projects, collectively, will enhance public transportation and other mobility options

It is critical that these new tolling projects provide residents the freedom to opt out of paying the toll all together through high-quality, cost-effective non-toll trip alternatives (e.g. carpool, vanpool, bus, rail, and cycling). These travel options should be supported by toll revenues. The I-495/American



Legion Bridge Transit and TDM Project is expertly tackling this question. We recommend the following measures to mitigate the projects' environmental impacts be included:

- Construct a new multi-use trail option to safely access and traverse the American Legion Bridge;
- Specify the process and expected revenue that would be generated to support transit investments within Maryland and Virginia, and those that connect both jurisdictions, including high-quality commuter bus transit using the HOT managed lanes, Bus Rapid Transit in parallel and nearby arterial roads, and improvements to the MARC system;
- Design the new American Legion Bridge to accommodate future rail transit options and/or conduct a thorough cost-benefit analysis to compare the bridge's design with and without future rail transit options; and,
- Explore innovative concepts to incent meaningful behavioral change, such as matching employer transit benefits to incent different travel patterns.

Specific to Maryland's I-495 and I-270 Managed Lanes Project, we recommend that Alternative 9 and Alternative 13B be further explored using the priorities in this letter to inform the ultimate Preferred Alternative. In addition, we recommend that the state select the Preferred Alternative that will minimize the Project's impact and costs, and ensure the Project is delivered in a reasonable time period. If the EIS schedule gets severely delayed due to public concerns raised about this Project, we encourage the state to consider limiting the scope of the Preferred Alternative and the analysis in the FEIS by only including the Managed Lane Study Corridors' segments included in the state's I-495 & I-270 P3 Program Phase 1 solicitation.

Thank you both for your leadership and continued commitment to collaboration and unity.

Sincerely,



JB Holston
Chief Executive Officer
Greater Washington Partnership

CC: Stephen Brich, Commissioner, VDOT
Jennifer Mitchell, Director, Virginia DRPT
Kevin Quinn, Administrator, MDOT MTA
Tim Smith, Administrator, MDOT SHA

