

June 17, 2023

# Chesapeake BAY CROSSING STUDY

TIER 2 NEPA

## PUBLIC COMMENT FORM

Comments

Covered walk way for pedestrians  
rest area  
filtered water station  
parking at one end

The sides are so low that it look like  
I'll fall over the side so I never go on  
that bridge.

IF you do transit make sure it goes to  
DC.

This form may be submitted by mail to:  
Bay Crossing Study, Maryland Transportation Authority  
Division of Planning & Program Development  
2310 Broening Highway, Baltimore, MD 21224



This form may also be submitted online at [baycrossingstudy.com](http://baycrossingstudy.com) or by email to [info@baycrossingstudy.com](mailto:info@baycrossingstudy.com).

Bay Crossing Study

Dear Folks:



24 June 2023

Please don't spend multiple fortunes (that are so badly needed for other things) on a new behemoth bridge over the Bay.

Is this not an opportunity to return to the concept of moving humans in groups, not wastefully in singles? Ferries worked well for a long time. Could not specialty bus lines be developed running between various spots on the Western and Eastern Shores?

Now that office workers, in many cases, are mixing at-home and in-office hours, people's schedules are more flexible. Surely that adds options for travel days and times. And as to vacation travel, I've long wondered why reservations at beaches must all be Saturday to Saturday. The property owners (not to mention cleaners) might be glad to mix up rental schedules.

Work-schedule flexibility should

lead to travel schedule flexibility,  
for both commuters and vacationers.

As to trucks and Americans' unfortunate fantasy that they must have everything delivered to their door as quickly as possible, that is a destructive delusion that should not be indulged. Trucks should get inducements to use highways and bridges at lower-capacity hours and days.

Please, let's stop catering to cars. A moment seems to be happening when mass transit is coming back into our consciousness. Please take advantage of that. Try to alleviate (forget fix) bridge crowding with various creative changes. Imagination!

Thanks.

Another Bridge?



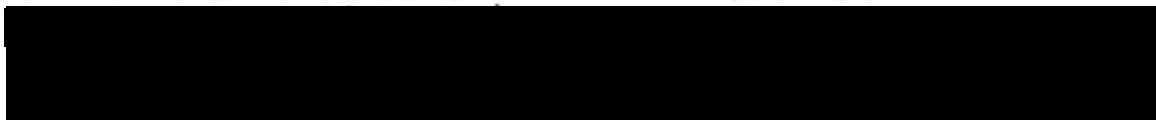
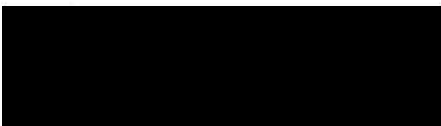
Is anyone thinking about the impact on wildlife? Dead fish are covering the beaches at times.

When I was nine years old my family would cross the bay on a ferry with our car. We did love the ride.

Couldn't the ferries work again?

Maybe people would spend the money and time to enjoy the scenery and a bite to eat.

There will always be a backup on 50 -  
Too many people - too many cars -  
not enough roads to for all.



Bay Crossing Study

[REDACTED]

This letter is to support the NO BUILD option. I understand the you are looking more closely at the feasibility and environmental impact of constructing a third bridge at Sandy Point.

One could posit that the \$9 billion dollar price tag could better serve the more citizens of Maryland via increasing affordable housing, improving healthy food access, medical care, education resources....

In the world of ethics it is called "distributive justice" and spending finite resources of limited time and energy and dollars in one area reduces spending in others.

Thank you for the opportunity to share my views.

[REDACTED]

Baltimore City

RECEIVED  
JUL 05 2023  
BY: *[Signature]*

# Chesapeake

## BAY CROSSING STUDY

TIER 2 NEPA

### PUBLIC COMMENT FORM

Comments

[Redacted]

I am not interested  
in additional space.

I would suggest that  
Maryland MDTA  
Advocate for  
Road Repair starting  
with Rowe Blvd  
to Annapolis Md  
there was a time  
when Road Crews  
always fixed the  
Roads

[Redacted]

As for the Bay Bridge & in  
that Rts 50 & 301  
Align - +30 part of Defense  
Hwy - what is the contribution  
of the Fed? their  
input?

This form may be submitted by mail to:

Bay Crossing Study, Maryland Transportation Authority  
Division of Planning & Program Development  
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U.S. Department of Transportation  
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Bay Bridge Crossing (S) comments:

I believe the only path to consider is the current corridor of Route 50/301. While either a northern approach would benefit some northern Marylanders and a southern approach would benefit some southern Marylanders, the real benefit would go to Pennsylvania and Virginia residents. I love both our northern and southern friends but unless they are willing to put up 35 percent of the total cost (bridge and all road enhancements required) of either project – my love stops at the pay point!

I believe the project should be with the future growth considered. Therefore we should be putting up eight additional lanes in play. I would propose that two lanes be added to both side of both existing bridges giving us a total of 13 total lanes. During off peak hours (maybe 10PM to 5AM) all but two lanes in both directions would be used, thus to save money on wear and tear. While there are many existing lane approaches to the current site, it may be that additional lanes will need to be added.

Bridge construction: I am not a structural engineer but I have worked around and with many over the years and have a rough understanding of stress and load benefits and requirements. I would propose to add two lanes to both sides of the current bridges and have current pilings share some of the load that would help reduce cost of the total project (perhaps significantly). The use of keystone and arches would also be involved to reduce cost.

I would suggest an undercarriage be utilized beneath the east bound right most new lanes that could be used for bicycle and foot traffic. It should be enclosed with chain link fence to prevent jumpers. Every 200 feet there should be observation decks like or on scenic mountain roadways or like on the Bay Bridge and Tunnell system because people will want to observe and take pictures. Observation decks would reduce potential congested areas. The undercarriage would need to be strong enough to support emergency equipment in the event of an accident.

I would suggest a similar undercarriage on the west bound right most new lanes for commuter buses that would only operate during peak travel hours. Large park and ride areas would need to be strategically placed on both sides of the bay (maybe as much as a mile away from the bridges themselves).

I am sure there are nay sayers that throw this idea out without proper consideration and so be it but I believe it deserves proper consideration.

A side note: I think the newly installed gates are an accident waiting to happen! On Tuesday evening (June 13<sup>th</sup>) around nine thirty PM I was headed west bound, the center lane on the west bound bridge was closed and east bound traffic was using the far lane. With all the headlights coming east bound (especially the new ultra bright lights) you could not see the gates even with all their red lights. Even in daylight hours, I find tem confusing – there are two many mergers and out-of-state drivers and I try to stay away from the gates (open or closed).

Thank You for reading,





July 11, 2023

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Alan L. Wurtzel

Bay Crossing Study  
2310 Broening Highway  
Baltimore, MD 21224.

Dear Bay Crossing Study Team:

The Chesapeake Bay Foundation (CBF) appreciates this opportunity to comment on the transit and bicycle/pedestrian considerations that should be addressed in the Tier 2 NEPA Bay Crossing Study. Evaluation of transit and other operational alternatives should be substantiated with the most current and accurate information about projected user demand and land use and infrastructure changes that the crossing is reasonably expected to induce. Maryland should minimize the potential adverse impacts of the crossing to communities and the environment by coordinating with localities to adopt smart growth and resource protection policies as a condition of the crossing's construction.

CBF commends MDTA for the commitment on its *Chesapeake Bay Crossing Study Tier 2 NEPA* website to "evaluate specific transportation alternatives within the Study Corridor, including conducting detailed engineering and environmental impact analyses." Consistent with our earlier written comments dated May 10, 2021 and December 15, 2017 (attached and incorporated here by reference), these analyses should:

- I. **Account for post-pandemic changes in travel demand.** Design and deployment of transit and bicycle/pedestrian elements should be based on information that accurately reflects current demand, which experts suggest has significantly changed from pre-pandemic levels. (CBF 5/10/21 Item I)
- II. **Combine transit with enhanced land use and demand management strategies to minimize need for increased vehicle crossing capacity.** *The 2006 Task Force on Traffic Capacity Across the Chesapeake Bay* documents community interest in "creating viable jobs, businesses, and industry on the Eastern Shore," which can help "reduce demand for capacity across the Bay." Land management strategies should be considered in concert with transit alternatives, which MDTA projects can "attract ridership and provide some congestion relief at the existing Bay Bridge" (*Analysis of Transit Only Concepts to Address Traffic Capacity Across the Chesapeake Bay*, 2007). CBF agrees with MDTA that "transit could be an important component of any future studies" and recommends that multi-modal



transit systems as well as bicycle and pedestrian lanes be thoroughly considered in the Phase II analysis. (CBF 12/15/17 Item III)

- III. **Project-induced demand for transportation services caused by Bay crossing enhancements.** MDTA's conclusion that constructing additional lanes will spur land development justify an account by the agency of the number, location, and type of new homes and businesses expected to be located in the region and any commensurate change in transportation infrastructure anticipated to be needed to serve these facilities, including transit modes and new travel lanes leading to and from the crossing. Impacts expected from the development of any transportation alternative should be fully documented and analyzed to support decision-making. (CBF 5/10/21 Item II; CBF 12/15/17 Items III and IV)
  
- IV. **Scenario-plan land use change and propose policy and regulatory measures that minimize adverse impacts.** Growth projection modeling tools available at the University of Maryland National Center for Smart Growth Research and Education, Maryland Department of Planning, and Chesapeake Bay Program should be engaged to evaluate induced demand for new housing and businesses whose development is subject to current land use policies and regulations. Projections should also be made for such development based on new or updated policies and regulations that would optimize achievement of the State's smart growth standards that include locating development in an around existing growth centers and minimizing development in areas designated for agriculture and resource conservation. The study should recommend that such policy and regulatory changes developed in partnership with local governments to attenuate the adverse effects of the crossing on communities and the environment are a condition of the crossing's construction. (CBF 12/15/17 Item III)

Thank you for your consideration of these comments. Please contact me at [REDACTED] or [REDACTED] if you have questions or would like more information.

Sincerely,

[REDACTED]

[REDACTED], Ph.D.  
Maryland Executive Director



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*Saving a National Treasure*

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May 10, 2021

Ms. Heather Lowe  
Maryland Transportation Authority  
Point Breeze  
2310 Broening Highway  
Baltimore, MD 21224

RE: CHESAPEAKE BAY CROSSING STUDY: TIER 1 NEPA  
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Lowe:

The Chesapeake Bay Foundation appreciates this opportunity to comment on the Bay Crossing Study's Draft Environmental Impact Statement Tier I NEPA report.

Established more than 50 years ago to Save the Bay, CBF currently represents approximately 94,000 members in Maryland. Our education department operates 15 field programs for students and teachers across the Chesapeake Bay watershed. Several of these facilities, as well as other CBF landholdings, are located near or within the Corridor Alternatives Retained for Analysis (CARA). In addition, our land and oyster restoration programs have created and enhanced oyster reefs in the Chesapeake Bay and its tributaries and established riparian buffers, wetlands, and forests throughout the Maryland portion of the watershed.

CBF provided detailed comments on the purpose, need and scope for the Bay Crossing Study on December 15, 2017. We appreciated the opportunity to meet with you and other members of the project team shortly thereafter. We were encouraged to see several of our concerns noted in the Draft Environmental Impact Statement (draft EIS), especially the potential for a new bridge to generate excessive development pressure on rural, working lands. Elimination of Corridors 1-5 and 9-14, along with the recommendation not to advance Corridors 6 and 8 will avoid potentially extreme consequences for water quality and communities in those locations.

However, the draft EIS fails to address several key issues and CBF remains concerned about the potential environmental impacts of a new span across the Bay in any location. Temporary and permanent direct impacts of a new bridge, plus intensification of access routes and increased development pressure could irrevocably harm the Bay and many communities along the route. **Stakeholders are entitled to a quantitative accounting of these potential impacts. In contrast, on many NEPA-required issues the draft EIS retreats to a speculative narrative that fails to provide an actionable statement of potential impact.**

PHILIP MERRILL ENVIRONMENTAL CENTER  
6 HERNDON AVENUE | ANNAPOLIS, MD 21403 | 410-268-8816 | CBF.ORG

The draft EIS must incorporate recent trends to estimate changes in demand for crossing capacity in future years, and more fully quantify the direct effects, indirect effects, and water quality implications of the Maryland Transportation Authority (MDTA) Recommended Preferred Corridor Alternative. At present, the study does not:

- I. Account for post-pandemic changes in travel demand and recent improvements to transportation systems management (TSM) on the existing bridge;
- II. Quantify potential indirect effects due to induced growth;
- III. Reflect the likely scope of access improvements and their associated impacts;
- IV. Account for water quality impacts to impaired waters.

Given these omissions, the draft EIS inappropriately disqualifies the no-build alternative, other modal options, and their potential combinations. As such, CBF respectfully requests that MDTA hold the study unless and until these omissions can be cured with updated travel patterns, quantifiable growth impact forecasts, full scoping of access improvements, and accounting associated with the Chesapeake Bay Total Maximum Daily Load (TMDL).

- I. **The draft EIS is incomplete without accounting for post-pandemic changes in travel demand and recent improvements to transportation systems management (TSM) on the existing bridge.**

The traffic projections in the draft EIS do not account for the dramatic decrease in travel during the COVID-19 pandemic and, more consequentially, potential permanent shifts in post-pandemic travel patterns. While the study could not reasonably have foreseen a global pandemic at the outset, it is not appropriate to continue the study as if nothing has changed. In California, aggregated cell phone data show a sustained 33% drop in commutes to and from work. These same data show a 26% decrease in retail trips and an 11% reduction in grocery and pharmacy trips (numbers correlated with an increase in online shopping and delivery services).<sup>1</sup> Experts suggest that as many as 30% of employees will work at least partially remotely by the end of 2021 in a new, post-pandemic normal.<sup>2</sup> Telework alone could significantly increase localized employment opportunities and result in the leveling off of cross-Bay weekday traffic growth in the future.

The draft EIS also fails to provide sufficient evidence for disqualifying transportation systems management (TSM) as part of an alternative to a build option. The draft does not appear to provide a quantified estimate for changes in level of service (LOS) resulting from TSM strategies. In addition, the draft EIS mentions but does not account for improvements in service from the actual recent installation of all-electronic tolling on the eastbound span. Anecdotally, it appears that this change has resulted in a very substantial LOS improvement on weekday evenings, especially when contra-flow is in effect on the westbound span.

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<sup>1</sup> Reese, Phillip. "Cell Data Offers Look at California Pandemic Travel Patterns." *Government Technology*; March 16, 2021. Accessed online at <https://www.govtech.com/analytics/cell-data-offers-look-at-california-pandemic-travel-patterns.html>

<sup>2</sup> Lister, Kate. "Work-At-Home After Covid-19—Our Forecast." *Global Workplace Analytics*; Accessed May 6, 2021 online at <https://globalworkplaceanalytics.com/work-at-home-after-covid-19-our-forecast>

The origin-destination study in the draft EIS reveals that nearly half of all weekday trips over the Bridge are local to Anne Arundel and Queen Anne's counties. Even on a summer Sunday, more than one quarter of trips are local to these counties. These figures suggest that telework and transit alternatives may be sufficient to offset a future with comparatively reduced demand due to durable changes in commutes and shopping behavior. This potential is buttressed by the fact that Average Daily Traffic (ADT) on the Bay Bridge has been flat for a decade, and that state growth projections for future travel demand on the Bridge have consistently overshot reality by a wide margin.<sup>3</sup> Predictions of continuing and persistent increases to 2040 (almost a 23 percent growth for non-summer weekday, and a 14 percent growth for summer weekend day) also fail to factor road (and beach-town) capacities and congestion as themselves limiting factors during summer weekends. MDTA should not advance the draft EIS without observing and accounting for changes in demand due to these factors, and increased efficiency from TSM improvements.

**II. The draft EIS is incomplete without quantifying potential indirect effects from land development and examining alternatives for managing induced demand.**

The draft EIS is rightly concerned about the potential indirect effects of induced development activity from the addition of travel capacity across the Chesapeake Bay. CBF agrees with MDTA's conclusion that constructing additional lanes will spur land development at a pace and extent greater than the no-build option.

However, the draft EIS provides no quantifiable account of the potential development activity that the agency expects to result from any of the corridor alternatives, including the Recommended Preferred Alternative. It is therefore not possible for the agency or stakeholders to use the DEIS to weigh the purported benefits of new construction against the potential impacts of this development activity. Nor can the agency or stakeholders effectively compare the Recommended Preferred Alternative to the no-build option. MDTA could reasonably provide quantifiable growth projections and associated impact statements in the draft EIS. Multiple growth projection models are currently in operation at the University of Maryland Center for Smart Growth, the Maryland Department of Planning (MDP), and the Chesapeake Bay Program (CBP). These models can test multiple scenarios with differing assumptions about demand and infrastructure improvements. These models can also incorporate local land use planning and zoning, and MDP's model can provide granular, parcel-level projections about the amount and intensity of future growth generated by each scenario. At least some of these tools should be in reach of the Bay Crossing Study as MDP is a coordinating agency on this project.

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<sup>3</sup> The 2004 Needs Assessment projected traffic counts of approximately 135,000 vehicles per day at the Bay Bridge by the year 2025. In 2015, MDTA revised projected traffic at the Bridge down to 92,800 vehicles per day by 2040 – less than half the original projected increase over nearly twice the time.<sup>(2)</sup> The actual average daily traffic at the eastbound toll plaza was 73,100 in 2016, which is less than the number of vehicles that crossed the Bridge in 2007.

The use of one or more growth models would also enable MDTA to robustly evaluate land use policy changes as a no-build alternative in conjunction with transit, TSM, and telework. Demand may be reduced if local jurisdictions partner to manage future growth in a way that minimizes the need for cross-Bay travel. Mixed-use zoning could provide employment and commercial opportunities that are currently only available to Eastern Shore residents by crossing the Bridge. In addition, compact development in growth areas and robust protections from sprawl in rural districts would help support transit alternatives.

### **III. The draft EIS lacks analysis of direct effects if the evaluation of access improvements is limited to the current corridor boundaries.**

It is not clear whether the Corridor boundaries shown on the draft EIS maps mark the limits of analysis for the impacts from access improvements required to serve a new span across the Bay. If so, we believe those limits are too narrowly construed and should be substantially expanded along the feeder routes. We restate from our prior comment letter that NEPA regulations require MDTA to evaluate all connected, cumulative and similar actions associated with proposed alternatives.<sup>4</sup> Among other criteria, actions are considered connected when they “cannot or will not proceed unless other actions are taken previously or simultaneously,” or when they “are interdependent parts of a larger action and depend on the larger action for their justification.”<sup>5</sup> MDTA’s 2015 *Life Cycle Cost Analysis* clearly states that the efficacy of expanded capacity across the Bay is dependent upon improvements to access corridors, stating that:

If improvements were only made to the Bay Bridge, they would not address the potential capacity limitations of US 50/301 on both sides of the bridge and would, therefore, not provide the regional transportation improvements needed to accommodate future traffic demand.<sup>6</sup>

As an example, the 2006 Task Force report stated that for a southern crossing between Calvert and Dorchester counties, “MD 4 would need to be upgraded with one to two additional lanes in each direction with greater controls of access from I-495 to Prince Frederick (32 miles). An access-controlled freeway could be needed around Prince Frederick.”<sup>7</sup> This expansion would be on top of the four-lane divided highway that already exists for much of its length.

Similarly, changes in traffic flow resulting from the Recommended Preferred Alternative are likely to extend for many miles beyond the US-50 / I-97 and US-50 / US-301 splits. Lengthy vehicle queues are already common at traffic signals along US-50 at MD 213, MD 404, and intersections at the approach to the Town of Easton. If LOS is substantially improved at the Bridge without capacity expansions at these other intersections, the problem will simply move ‘downstream’ and these intersections (possibly also the intervening linear segments) would fail at an increased rate. A reasonably foreseeable next

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<sup>4</sup> 40 C.F.R. §1508.25(a).

<sup>5</sup> 40 C.F.R. § 1508.25(a).

<sup>6</sup> MDTA (2015), p. 1.

<sup>7</sup> MDTA (2006), p. 12.

step would be to substantially intensify this entire portion of the US-50 corridor or build another regional bypass. In either case, the need for these changes would be driven directly by the Recommended Preferred Alternative. Therefore, their direct and indirect impacts – which would likely be substantial -- must be evaluated in this EIS.

**IV. The draft EIS is incomplete without accounting for nutrient and sediment discharges to impaired waters, and their expected water quality impacts.**

The Chesapeake Bay and its tributaries affected by the Recommended Preferred Alternative are impaired by excess nitrogen, phosphorus, and sediment. These impairments required the development of a Chesapeake Bay Total Maximum Daily Load (TMDL) for these pollutants. Maryland was also required to adopt a series of Watershed Implementation Plans to provide reasonable assurance that the pollution reduction targets in the Bay TMDL would be achieved.

Under the TMDL framework, it is highly likely that expanded travel capacity across the Bay will result in new pollution loads from construction activity, land conversion and future growth that increase the total load flowing into several Bay segments. As stated in our prior comment letter, construction of a new crossing and associated improvements along access corridors could result in significant short term increases in pollution loads including nutrients, sediment, and toxic contaminants. In fact, the Chesapeake Bay Watershed Model recognizes construction activity among the highest loading non-agricultural sources of nitrogen, phosphorus, and sediment on a per-acre basis.<sup>8</sup> Systemic, long term increases in pollution loads could result from the conversion, filling, or degradation of porous, bio-active resource lands such as forests, wetlands, pastures, hay fields and mixed open areas along the route. Growth and development induced by the project is likely to increase pollution loads through additional wastewater flows, increased stormwater volumes, and new sources of air deposition from associated vehicle trips and energy consumption.

The Clean Water Act requires that new or expanding loads to an impaired waterbody be accounted for and fully offset so there is no increase in pollution. As drafted, the EIS does not include such an accounting among the corridor and no-build alternatives, nor does it outline options to offset these loads. The federal-state Chesapeake Bay Program partnership maintains tools that can assist agencies in quantifying the potential changes in pollution loads due to construction, changes in land cover, and air emissions. Many of the coordinating agencies on this project are also CBP partners with access to these tools.

**Conclusions**

CBF believes the EIS is deficient as currently drafted and improperly disqualifies the no-build alternative on its own and in combination with telework, transportation systems management, transit, and land use strategies. If MDTA wishes to proceed, a revised EIS must properly observe and integrate current travel patterns, quantify induced growth and

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<sup>8</sup> Chesapeake Bay Program (2017). *Phase 6 Watershed Model – Section 2 – Average Loads - Draft Phase 6*.

its likely effects, describe the full scope and both direct and indirect effects of access improvements, and account for nutrient and sediment discharges under the Bay TMDL.

Once again, we appreciate the opportunity to comment on this DEIS. Please do not hesitate to contact my office at [REDACTED] if you have any questions or would like to discuss this matter in further detail.

Sincerely,

[REDACTED]

Executive Director Maryland Office  
Chesapeake Bay Foundation



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December 15, 2017

Mr. Kevin Reigrut, Executive Director  
Maryland Transportation Authority  
2310 Broening Highway  
Baltimore, MD 21224

SUBMITTED AT [WWW.BAYCROSSINGSTUDY.COM](http://WWW.BAYCROSSINGSTUDY.COM)  
AND VIA EMAIL TO [info@baycrossingstudy.com](mailto:info@baycrossingstudy.com)

RE: MDTA Chesapeake Bay Crossing Study  
Tier I Environmental Impact Statement

Dear Mr. Reigrut:

The Chesapeake Bay Foundation appreciates this opportunity to comment on a potential purpose, need and scope for the Maryland Transportation Authority's Tier One Environmental Impact Statement ("EIS") for the Chesapeake Bay Crossing Study prepared pursuant to the National Environmental Policy Act ("NEPA"). Per your invitation at the November 15, 2017 webinar, we respectfully request to meet with the project team to discuss our comments and other aspects of the study in further detail.

Established 50 years ago, CBF is the largest non-profit organization dedicated solely to the restoration of the Chesapeake Bay. We maintain offices in three states and the District of Columbia and represent approximately 94,000 members in Maryland. Our education department operates 15 field programs for students and teachers across the watershed. Several of these facilities are located within the study's "sub-area" boundaries. In addition, our land and oyster restoration programs have created and enhanced oyster reefs in the Chesapeake Bay and its tributaries and established riparian buffers, wetlands, and forest stands in the Maryland portion of the watershed. We encourage MDTA to protect these resources and ensure that the study fully accounts for the state's commitments to clean water as described in the Chesapeake Bay TMDL and Watershed Implementation Plans.

CBF respectfully submits the following comments and recommendations on a potential purpose, need and scope for the Tier I EIS. In summary, we believe that the purpose and need should reflect the goals and objectives of state and regional plans. The study should not reject alternatives to a new crossing out of hand. The analysis of direct, indirect and cumulative impacts of proposed alternatives must account for



the full extent of improvements to access corridors, changes in land use, and impacts on state goals for climate change and the health of the Chesapeake Bay.

Specifically, we note that the stated need for a new crossing requires additional justification using updated projections for population growth and travel behavior. It also requires more solid grounding in applicable state, regional and local transportation and land use plans. The scope of the study should include alternative actions that emphasize growth and land use policy changes, enhanced transit, and additional transportation demand management options in lieu of and in combination with “build” alternatives. The scope must be sufficiently broad to account for improvements and impacts along potential access corridors for a new crossing. Finally, the review of direct, indirect and cumulative effects should examine the impact of proposed alternatives on Maryland’s progress towards commitments established to address climate change and water quality under the Greenhouse Gas Emissions Reduction Act and the Chesapeake Bay TMDL.

**I. MDTA should revise outdated population and traffic projections and conduct a constrained analysis of demand that accounts for reasonably attainable changes to travel patterns across the region.**

Comments by the project team during the November 15, 2017 on-line scoping meeting indicated that the Tier I EIS will consider and, presumably, build upon the 2004 Transportation Needs Assessment and the 2006 Task Force Report. CBF agrees that these past efforts provide important context for the current study in terms of stakeholder views and the various considerations and impacts associated with a new crossing. However, we believe that the population and traffic projections included in these prior studies do not provide a valid basis to restrict the purpose and need of the Tier I EIS to the construction of a new vehicular crossing.

The 2004 and 2006 studies were completed during a time of nearly unprecedented growth, and many of the population and traffic projections included in these studies have since been revised downward. For example, the 2004 Needs Assessment cites a growth rate of almost 20% in Queen Anne’s County, 11% in Upper Eastern Shore counties and 8% in counties on the lower Eastern Shore from 2000 to 2010.<sup>1</sup> Recent estimates from the Maryland State Data Center indicate that the growth rate on the Upper Eastern Shore has fallen to 1% since 2010. The growth rate on the Lower Eastern Shore is approximately 2% over the same time period. Six of the nine Eastern Shore counties have experienced decreases in population since 2010.<sup>2</sup>

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<sup>1</sup> MDTA (2004). *Transportation Needs Report, William Preston Lane Jr. Memorial (Bay) Bridge*. Vol 1, p. 3-1.  
<sup>2</sup> MDP (2017). *Table 1A, Total Resident Population for Maryland’s Jurisdictions, April 1, 2010 Thru July 1, 2016*. Accessed online December 12, 2017.

The dramatic reduction in growth on the Eastern Shore calls into question the applicability of traffic projections from these early studies. The 2004 Needs Assessment projected traffic counts of approximately 135,000 vehicles per day at the Bay Bridge by the year 2025, which would exceed capacity of the Bay Bridge and approach roadways by 60%.<sup>3</sup> In 2015, MDTA revised projected traffic at the Bridge down to 92,800 vehicles per day by 2040 – less than half the original projected increase over nearly twice the time.<sup>4</sup> The actual average daily traffic at the eastbound toll plaza was 73,100 in 2016, which is less than the number of vehicles that crossed the Bridge in 2007.<sup>5</sup>

The traffic projections in the 2015 Life Cycle Cost Analysis are based on more recent trends; however, these projections alone are insufficient to justify limiting the scope to a new crossing. First, the unconstrained model employed in the analysis is likely to overstate future conditions because it does not fully account for adaptive behaviors by travelers or transit providers. To our knowledge, the six-hour, 12-mile daily queues produced by the analysis would be unprecedented and are not supported by experience on more heavily traveled routes and toll facilities across the state. If congestion increases, more drivers are likely to alter their departure or arrival time. Commuters may opt to share rides, take transit or add telework days. In addition, the 2015 analysis did not include an origin-destination study, which is needed to determine whether (and if so, where) a new crossing would effectively increase accessibility in the region. Furthermore, it is unclear at this point to what extent the significant delays experienced along the westbound approach to the Bridge are related to conditions at the Bridge. Traffic studies conducted as part of the Tier I EIS should examine these dynamics and not prematurely foreclose the possibility that alternatives to a new crossing would be sufficient to address capacity concerns. Without this information, it is premature to restrict the purpose and need of the study to a new crossing.

**II. MDTA should identify a purpose that is consistent with state, regional and local plans, including an emphasis on system preservation, environmental stewardship and coordination with land use planning.**

Maryland's transportation system includes more than 32,000 miles of roads and 5,000 bridges serving urban and rural communities across the state. As you know, MDOT balances and prioritizes investments in this transportation network with a set of planning and funding tools including the Maryland Transportation Plan (MTP), short-

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<sup>3</sup> MDTA (2004). p. ES-2.

<sup>4</sup> Md Transportation Authority (2015). *US 50/301 William Preston Lane Memorial (Bay) Bridge Life Cycle Cost Analysis*. p. 12.

<sup>5</sup> [http://www.marylandroads.com/Traffic\\_Volume\\_Maps/Traffic\\_Volume\\_Maps.pdf](http://www.marylandroads.com/Traffic_Volume_Maps/Traffic_Volume_Maps.pdf). Accessed online December 13, 2017.

and long-range plans from Maryland's six Metropolitan Planning Organizations, and transportation planning elements in local comprehensive plans. In particular, the MTP is used to "identify the State's most critical transportation needs...serves as MDOT's guiding policy document...incorporates related State goals for sustainable growth, the economy, and the environment...and how and where to direct Maryland's transportation investments."<sup>6</sup> The plan is informed by an extensive stakeholder process and other important planning tools including the State Development Plan and the Greenhouse Gas Emissions Reduction Act Plan.

Federal transportation statutes state that the objectives of a proposed transportation project may include "achieving a transportation objective identified in an applicable statewide or metropolitan transportation plan," and "supporting land use, economic development, or growth objectives established in applicable Federal, State, local or tribal plans."<sup>7</sup> CBF could not identify a new crossing in any adopted state or regional transportation plan. The adopted MTP heavily emphasizes system preservation, environmental stewardship, and better coordination of transportation investments and land use planning, both as guiding principles and as specific strategies to manage congested infrastructure.<sup>8</sup>

Given that a new crossing is a novel project in terms of state and regional planning, it is imperative that the purpose, need, and alternatives presented in the Tier I EIS reflect adopted state goals and objectives. As of now, the purpose of the Tier I EIS appears limited to "adequate capacity, dependable and reliable travel times, and flexibility to accommodate future maintenance and rehabilitation."<sup>9</sup> Failure to expand the purpose and scope could create conflicts between the selected alternative and other state projects and needs, long-range land use planning, and established goals for environmental protection.

Accordingly, we strongly recommend that MDTA expand the purpose of the Tier I EIS to include these core state planning objectives in a manner consistent with applicable federal statutes. This may lead MDTA to target a level of service at Bay crossing facilities that partially accommodates anticipated travel demand, which the Life Cycle Cost Analysis identified as a reasonable and available course of action.<sup>10</sup> In any case, incorporating state and regional planning objectives will provide MDTA

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<sup>6</sup> MD Dept of Transportation (2014/2016). *2035 Maryland Transportation Plan: Moving Maryland Forward*. p. 3.

<sup>7</sup> 23 U.S.C. § 139(f)(3).

<sup>8</sup> MDOT (2014/2016). pp. 9, 16, 18.

<sup>9</sup> MDTA (2017). *Chesapeake Bay Crossing Study Tier 1 NEPA, On-line Scoping Meeting November 15, 2017*. Slide 27.

<sup>10</sup> MDTA (2015) p. 23.

with the flexibility needed to balance perceived capacity needs with established goals for environmental protection and growth management.

**III. MDTA should include alternatives that combine enhanced land use management with transit and transportation demand management strategies alone and in combination with expansion or replacement of an existing span.**

The on-line scoping meeting materials state that the purpose of the Tier I EIS is to “identify the corridor of a new crossing.”<sup>11</sup> A reasonable interpretation of this purpose is that the decision to build a new vehicular crossing has been made and that the study will be limited to identifying a specific location. CBF believes this conclusion is premature and should be evaluated within the study among a wide range of alternatives, not used to define the study’s parameters. Additional alternatives should include, at a minimum, enhanced land use management, increased transit options, and rehabilitation or expansion of existing spans.

The 2006 Task Force report highlights the importance and potential efficacy of enhanced land use management to reduce demand for capacity at the Bridge while satisfying other community and regional goals. Specifically, the report states that:

The Task Force, particularly those representing Eastern Shore counties, expressed concern that new capacity would negatively affect communities and other resources within all four zones...They recommended that state and local jurisdictions focus on creating viable jobs, businesses, and industry on the Eastern Shore for its citizens so more roads are not needed.<sup>12</sup>

Many Task Force members commented on the potential to slow growth and reduce the demand for capacity across the Bay. Some suggested that because growth follows the addition of highways and public utilities, limiting that type of infrastructure would also limit growth and the demand for a new crossing.<sup>13</sup>

Clearly, a wide cross-section of stakeholders believed that enhanced land use management could reduce demand for cross-Bay travel such that an additional crossing might not be needed. Land use management strategies could also influence the effectiveness of “build” options, including the relative suitability of a replacement span compared to a new crossing elsewhere on the Bay.

Increased options for transit may have similar reductive effects on traffic congestion. The Maryland Transportation Authority’s *Analysis of Transit Only Concepts to*

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<sup>11</sup> MDTA (2017) Slide 14.

<sup>12</sup> MD Transportation Authority (2006) *Task Force on Traffic Capacity Across the Chesapeake Bay*. p. 29.

<sup>13</sup> *Ibid.*, p. 30.

*Address Traffic Capacity across the Chesapeake Bay* (2007) found that expanding transit could have positive effects on congestion at the Bridge. While the study did not recommend a *transit only* solution, the study states that “because transit is projected to attract ridership and provide some congestion relief at the existing Bay Bridge, it is clear that transit could be an important component of any future studies on additional capacity across the Chesapeake Bay.”<sup>14</sup> It is possible that better matches between proposed transit service locations and the results of the origin-destination analysis would increase the projected effectiveness of transit. Preferential toll pricing for ride-sharing and other transportation demand management programs should also be explored to reduce cross-Bay travel demand.

These strategies are likely needed under any alternative that MDTA ultimately selects. The 2006 Task Force report found that even with the construction of a southern crossing between Calvert and Dorchester counties, “major capacity issues would remain on the existing bridge. US 50 outside Annapolis would remain severely congested.”<sup>15</sup> Construction of a northern crossing between Baltimore and Kent counties would not relieve congestion on US 50, either.<sup>16</sup> Given these findings, it is difficult to envision a successful alternative that does not include enhanced land use, transit and transportation demand management.

The cumulative effect of enhanced land use management, increased transit options, and additional strategies to reduce or flatten peak travel demand may be sufficient to justify a no-build alternative. These strategies may reduce the size and scope of the investment needed and the impacts associated with an expansion or replacement of the existing spans. These strategies appear to be essential to address congestion at the existing spans even if MDTA were to build a new crossing elsewhere on the Bay. MDTA has a responsibility under NEPA regulations to analyze reasonable alternatives not within the jurisdiction of the lead agency.<sup>17</sup> CBF recommends that these alternatives include, at a minimum, enhanced land use management, increased transit, and transportation demand management strategies in lieu of a new crossing and in combination with alternatives that would expand or replace existing spans.

**IV. MDTA should ensure that the study’s scope fully accounts for impacts associated with improvements to access corridors serving a new or expanded span.**

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<sup>14</sup> Md Transportation Authority (2007). *Analysis of Transit Only Concepts To Address Traffic Capacity Across the Chesapeake Bay*. p. 3.

<sup>15</sup> MDTA (2006). p. 12.

<sup>16</sup> *Ibid.* p. 12.

<sup>17</sup> 40 C.F.R. § 1502.14(c).

Federal NEPA regulations require that MDTA evaluate all connected, cumulative and similar actions associated with proposed alternatives.<sup>18</sup> Among other criteria, actions are considered connected when they “cannot or will not proceed unless other actions are taken previously or simultaneously,” or when they “are interdependent parts of a larger action and depend on the larger action for their justification.”<sup>19</sup> The 2015 Life Cycle Cost Analysis clearly identifies the efficacy of expanded capacity across the Bay as dependent upon improvements to access corridors, stating that:

If improvements were only made to the Bay Bridge, they would not address the potential capacity limitations of US 50/301 on both sides of the bridge and would; therefore, not provide the regional transportation improvements needed to accommodate future traffic demand.<sup>20</sup>

In these cases, the scope and impact of improvements required to access corridors are likely to be substantial and could extend beyond the approximate “sub-area” boundaries identified for analysis during the on-line scoping meeting. The 2006 Task Force report states that for a southern crossing between Calvert and Dorchester counties:

MD 4 would need to be upgraded with one to two additional lanes in each direction with greater controls of access from I-495 to Prince Frederick (32 miles). An access controlled freeway could be needed around Prince Frederick. In Dorchester County, an upgrade to MD 16 or construction of a new roadway may be necessary. This upgrade or new construction would impact small communities and roughly 20 miles of sensitive environmental areas (along and near MD 16). Because 85 percent of Dorchester County is covered by wetlands, the length of roadway bridges could be greater than the Bay crossing itself.<sup>21</sup>

The Tier I EIS must identify the full geographic extent and material scope of improvements necessary for access corridors to adequately support additional capacity across the Bay. The EIS must also include an analysis of the impacts associated with these improvements. We strongly encourage MDTA to employ a conservative approach in demarcating the study areas for each alternative to ensure that the full extent of necessary corridor improvements and their associated direct, indirect and cumulative impacts are adequately considered.

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<sup>18</sup> 40 C.F.R. §1508.25(a).

<sup>19</sup> 40 C.F.R. § 1508.25(a).

<sup>20</sup> MDTA (2015). p. 1.

<sup>21</sup> MDTA (2006). p. 12.

**V. MDTA should account for the direct, indirect and cumulative impacts of each proposed alternative on Maryland’s commitments for air and water quality.**

Federal regulations specifically anticipate that a Tier I EIS should “focus on broad issues such as general location, mode choice, and areawide air quality and land use implications of the major alternatives.”<sup>22</sup> These implications can include “growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.”<sup>23</sup> CBF concurs with the findings of the 2006 Task Force report that a new crossing is highly likely to focus substantial demand for growth and infrastructure in areas that otherwise would not experience such levels of development pressure. These indirect and cumulative impacts, along with the direct impacts associated with construction, land conversion and increased vehicle miles traveled could have deleterious effects on local and regional air and water quality. These activities may also impact subsurface habitat and system function for oysters, fish, and benthic communities.

As you may know, the Chesapeake Bay and many of its tributary rivers and streams are listed as impaired waterways under Section 303(d) of the Clean Water Act. As result of those impairments, the Chesapeake Bay states including Maryland asked the US Environmental Protection Agency to develop a Total Maximum Daily Load (TMDL) for nitrogen, phosphorous and sediment in the Chesapeake Bay and the tributaries to the Bay. The Chesapeake Bay TMDL establishes specific pollution loading limits for all major source sectors, including agriculture, wastewater, stormwater, septic systems, atmospheric deposition, and forest.<sup>24</sup> These limits represent the maximum amount of pollution that the Chesapeake Bay can assimilate while meeting water quality standards. Specific target loads for each sector have been assigned for the Bay watershed, the State of Maryland, major basins within the state, and county jurisdictions. All of these allocations require reductions from current loads. The state, in coordination with its local jurisdictions and the U.S. Environmental Protection Agency, has developed a Watershed Implementation Plan to provide reasonable assurance that these reductions will be achieved.

Construction of a new crossing and associated improvements along access corridors could result in significant short term increases in pollution loads including nutrients, sediment and toxic contaminants. In fact, the Chesapeake Bay Watershed Model

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<sup>22</sup> 23 C.F.R. § 771.111(g).

<sup>23</sup> 40 C.F.R. § 1508.8(b).

<sup>24</sup> United States Environmental Protection Agency (2010). *Chesapeake Bay Total Maximum Daily Load for Nitrogen, Phosphorus and Sediment*.

recognizes construction activity among the highest loading non-agricultural sources of nitrogen, phosphorus and sediment on a per-acre basis.<sup>25</sup> Systemic, long term increases in pollution loads could result from the conversion, filling or degradation of porous, bio-active resource lands such as forests, wetlands, pastures, hay fields and mixed open areas along the route. Growth and development induced by the project is likely to increase pollution loads through additional wastewater flows, increased stormwater volumes, and new sources of air deposition from associated vehicle trips and energy consumption.

Under the TMDL framework, new or expanding loads to an impaired water body must be accounted for and fully offset so there is no increase in pollution.<sup>26</sup> It is highly likely that expanded travel capacity across the Bay will result in new pollution loads from construction activity, land conversion and future growth. These activities may also impede Maryland's ability to achieve goals that support habitat, fisheries and resource lands in the Chesapeake Bay Agreement. The Tier I EIS should examine the relative contribution to changes in pollution loads caused by each alternative's direct, indirect and cumulative impacts and identify any conflicts with the Bay Agreement, the Chesapeake Bay TMDL, local TMDLs, and any limits to assimilative capacity under Maryland's anti-degradation framework. MDTA should identify the feasibility and expense of offsetting these loads in accordance with federal law.

CBF also recommends that MDTA evaluate the impacts of each proposed alternative on Maryland's progress toward statutory greenhouse gas reduction goals. The 2016 Greenhouse Gas Emissions Reduction Act of mandates development of a plan to achieve 40% reduction in emissions by 2030.<sup>27</sup> This plan is under development now; strategies in the current plan (written to achieve earlier reduction goals) include support for transportation investments that reduce vehicle miles traveled ("VMT") and increase the availability of transit.<sup>28</sup> The Tier I EIS should evaluate the relative effectiveness of each proposed alternative in achieving these goals and identify any alternatives that would increase VMT or limit the provision of transit.

In closing, CBF recognizes that traffic congestion at the Bay Bridge can result in delays during peak travel periods that many Marylanders consider unacceptable. We are also cognizant that a new crossing could have profound impacts on the health of the Chesapeake Bay and the communities that call it home. CBF seeks to be a

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<sup>25</sup> Chesapeake Bay Program (2017). *Phase 6 Watershed Model – Section 2 – Average Loads - Draft Phase 6*.

<sup>26</sup> 40 CFR § 122.4(i)

<sup>27</sup> Md. ENVIRONMENT Code Ann. § 2-1205(c).

<sup>28</sup> MD Department of the Environment (2015). *Greenhouse Gas Emissions Reduction Plan Update*.



constructive participant to help MDTA arrive at a solution that advances the state's goals for transportation, growth management and environmental protection. In that regard, we would appreciate the opportunity to meet with the project team and discuss the purpose, need and scope of this project in further detail.

Thank you again for the opportunity to comment on the Tier I EIS. Please do not hesitate to contact our office at [REDACTED] to discuss these comments or schedule a meeting.

Sincerely,

[REDACTED]

[REDACTED] AICP  
Maryland Land Use Planner and Assistant Director

## **Comments on Chesapeake Bay Crossing Tier 2 Study**

July 11, 2023

Maryland Sierra Club is submitting the following comments on the Chesapeake Bay Crossing Tier 2 National Environmental Policy Act (NEPA) Study that is analyzing alternatives to provide congestion relief and improve travel reliability, mobility and safety across the Chesapeake Bay.

We strongly support the development of an integrated combination of modal and operational alternatives that would address growing traffic congestion and be more cost-effective and much better for the environment than adding another bay crossing.

The combination of alternatives we support include an enlarged rapid transit system using electric buses, significant bicycle infrastructure, a robust electric ferry system, possibly a rail line, together with a number of options offered by transportation system management (TSM) and transportation demand management (TDM).

It should be noted that the above alternatives were considered in the Tier 1 Study only as stand-alone alternatives so were eliminated from consideration because they were not viable by themselves. Had they been considered as part of an integrated clean transportation solution that used existing roads and bridges, in addition to the many reasons not to build a new bay crossing that are summarized at the end of this document, we believe the Tier 1 Study would have concluded the No Build Alternative made the most sense vs. the Selected Corridor Alternative (Corridor 7) containing the existing Bay Bridge. Fortunately, the Tier 1 FEIS/ROD commits the state to consider in its Tier 2 Study an alternative that combines modal and TSM/TDM alternatives.

We incorporate by reference similar viewpoints further discussed in the Queen Anne's Conservation Association's Preliminary Comments on the Tier 2 NEPA Study.

### **Transit alternatives**

The addition of more reliable, affordable, accessible, and rapid electric public transit traveling across existing roadway and bridges would attract ridership and allow many people to leave their cars at home, thereby reducing traffic congestion. Public transit also is more equitable than adding more roads or another bridge because it serves residents at all income levels (including those who cannot afford a car), and would be much more environmentally-friendly than cars and SUVs that emit greenhouse gas emissions and other health-damaging air pollution.

Effective modeling by transportation planners could determine the best routes and schedules for existing and additional transit to attract and serve the most people, particularly local residents traveling to and from jobs, and could determine whether use of vans and mini-buses should be part of the vehicle mix. Data would need to be routinely collected on ridership to allow routes and schedules to be modified as needed to work in coordination with other alternatives, better serve riders and lessen traffic congestion.

To enable rapid travel across the current the bay crossings, buses would need to have dedicated lanes, have off-board fare payment to speed up boarding, and have transit signal priority in intersections. Full coordination among state, county and local government transportation departments in funding and planning decisions would be needed to create a seamless, integrated network of high performing public transit options.

Another possibility to be explored would be for bus service to be offered during summer months between population centers like the Washington metro region (using a highly transit-accessible location in Maryland such as Silver Spring) and Ocean City, with a brief stop in Annapolis and possibly another city or two along the way to pick up and drop off passengers. Surveys would need to be taken to determine what days during the week the buses should run and the best departure times in order to have sufficient travelers to justify the bus service.

### **Bicycle infrastructure**

The large number of bicyclists who spoke at MDTA's Tier 2 Study Virtual Listening Meeting on June 27, 2023, is testament to the popularity of including bike infrastructure on a bay crossing. Biking not only is a non-polluting and effective way for individuals to travel, it also has been shown to reduce health costs. For bicyclists to be able to travel safely on roads and a bay crossing, they would need to have one-way, well-marked, protected bike lanes to travel in and definitely not just a designated portion of lanes being actively used by cars, trucks or buses.

If allocating space for protected, one-way bike lanes would be difficult to provide on a bay crossing when traffic is at its peak, one solution would be to designate a number of consecutive hours between peak travel times when biking on a bay crossing would be permitted.

### **Electric ferry service and rail travel**

A robust ferry service and having light or heavy rail running across the bay are options that

should be given serious consideration as well. The ferries should be powered by rechargeable electric batteries so they would be non-polluting, and the trains should run on electricity vs. diesel. To attract riders to the ferry service, pedestrians and bicyclists possibly could ride free; there would be a charge for cars. Transportation planners should be tasked with determining which alternatives would be able to attract sufficient ridership to be economically feasible, and also should determine how each alternative could be implemented in a manner that complements and works in full coordination with other alternatives.

Electric ferries probably could be leased for use in a pilot study which would keep costs down. Establishing a light or heavy rail service would make most sense if made part of a rail system that serves a larger area than just to cross the bay. Building a rail system not only would help eliminate congestion crossing the bay, it would provide economic and social mobility that would advance the region's economic potential.

### **TSM and TDM options**

TSM options that should be considered include using congestion pricing during peak travel times and/or reducing tolls during off-peak travel, having lower-priced or possibly no tolls for high occupancy vehicles, implementing traffic signal coordination, and using other proven techniques for managing traffic congestion. TDM options could include having high occupancy vehicle lanes, creating more park and ride locations on both sides of the bay, and incentivizing employers in the region to offer flexible work schedules and/or staged work schedules that have employees starting and leaving work at different times. Other TDM options include incentivizing employers to allow more telework and to provide transit subsidies and not free parking for employees who travel to work, and incentivizing property rental companies on the Eastern Shore to offer weekly rental periods that start and end on different weekdays.

### **Additional reasons why another bay crossing should not be built**

As stated at earlier, we believe existing traffic congestion on the current bay crossings warrants the state taking action. However, we strongly recommend an integrated combination of modal and operational alternatives be implemented to relieve growing traffic congestion and provide more equitable access to economic and social mobility vs. building another bay crossing.

The impact of climate change on future growth patterns can't be ignored. Climate change is already happening and may fundamentally alter growth and traffic to Eastern Shore communities. According to the Maryland Department of the Environment, "With 3,100 miles of shoreline, Maryland is the fourth most vulnerable state to suffer the effects of sea-level rise associated with climate change. Rising sea levels and increased storm intensity could have devastating and far-reaching impacts on the Atlantic coast and the Chesapeake Bay ecosystem that affect the environmental, recreational and economic benefits enjoyed by Maryland and its visitors."

Projections of future growth in traffic to the Eastern Shore are not reliable because they are based on past experience, before climate change became so evident. With increasing adverse impacts on our state's shoreline being inevitable, planning to build another multi-billion dollar bay crossing would not be prudent, and that money would be better spent for other purposes such as building a Red Line in Baltimore or creating a high performing electric transit system and ferry service that would reduce the number of cars seeking to cross the current bay bridges.

Transportation is the largest source of climate-damaging greenhouse gas (GHG) emissions in our state. Numerous academic studies and many years of practical experience have shown that expanding highways or adding another bridge would "induce demand", that is, attract more drivers who believe their travel would be faster. This means traffic congestion would continue and the increased number of drivers would generate increased GHG emissions and other health-damaging air pollution. That is the opposite of what should be happening now to enable Maryland to meet its goal of a 60% reduction in GHG emissions by 2031, with zero emissions by 2045.

A 3<sup>rd</sup> bay crossing would damage the bay. Even though Corridor 7, the preferred alternative selected in the Tier 1 Study, is projected by MDOT to have the smallest environmental impact of all the corridors studied according to the DEIS, it still would affect more than 10,000 acres of tidal wetlands and more than a thousand acres each of non-tidal wetlands, oyster resources, and other sensitive areas, according to the Chesapeake Bay Foundation (CBF).

Also, the increasing amount of air pollution (that contains nitrogen oxides) generated in the watershed area by the increased number of vehicles would be bad news for the bay and its tributaries. Roughly one-third of the nitrogen pollution in the bay comes from the air, according to CBF. Excess nitrogen can fuel the growth of algae blooms, which can block sunlight from reaching underwater grasses and create low-oxygen "dead zones" that suffocate marine life.

Adverse impacts on the communities on the Eastern Shore also are a major concern. The Tier 1 FEIS/ROD stated that, “It is anticipated that any new crossing capacity over the Chesapeake Bay would lead to potential land use changes and development on the Eastern Shore.” The additional traffic across a new bay crossing plus new traffic arising from such development could significantly harm the health and wellbeing of communities on the Eastern Shore and cancel out any potential congestion improvements anticipated to come from a third bay crossing. The increased air pollution from the additional number of vehicles and the problems with worsened local congestion – such as increased difficulties for emergency vehicles, school children and commuters – would be a major concern. See further information on the need to account for and study these concerns in Queen Anne’s Conservation Association’s Preliminary Comments on the Tier 2 NEPA Study.

### **Conclusion**

The implementation of a fully integrated, comprehensive clean transportation solution composed of alternatives described above would address current and future traffic congestion on the current bay bridges in a safe, more cost-effective, equitable, reliable and more environmentally-friendly manner than adding a third bay crossing.

██████████ Clean Transportation Co-Chair

Maryland Sierra Club, ██████████

Personal address: ██████████