

## **Testimony on behalf of the Washington Biologists' Field Club, to the Montgomery Co. MD Transportation Committee hearing 24 January 2023**

Plummers Island, C & O Canal National Historical Park, Montgomery Co., Maryland, is an ecologically sensitive nature reserve, and Washington Biologists' Field Club Research Station for 122 years. The Island would be directly threatened by the expansion of the American Legion Bridge onto the Island. The WBFC has been a consulting party with the MDOT and Federal Section 106 process for 2 years. As part of that process Plummers Island and the WBFC were determined to be eligible for registration with the National Trust for Historic Places.

The current Accelerate-Maryland MDOT plan (as illustrated in the WAPO article of December 30, 2022) envisions a new bridge of 17 lanes and 4 shoulders, plus a bike and pedestrian lane, and a gap between north and south-bound bridges. This would be the widest bridge in America. It would overhang a significant area, shade much more, and extend toxic runoff, noise, and air pollution onto Plummers Island. WBFC is opposed to this plan.

There are several rare plant species within the Limits of Disturbance on the Island. WBFC has a long-term research plot within the Limits of Disturbance that would be destroyed, and another long-term plot, and rare plant communities within and just beyond the LOD that would be affected by the extended bridge shadow. About 2 dozen trees would be cut down, and a line of three piers of 10 ft diameter would be placed on the island. The flow of Plummers Channel (AKA Rock-Run Culvert in DEIS and SDEIS, or oxbow in FEIS) would be significantly altered and affect flooding regimes on the Island.

In short, this plan would be disastrous to the continuity of long-term ecological and biodiversity research on Plummers Island, a primary reason for which the Club was founded in 1901.

As for the P3 plan, we believe it should be rejected that on grounds that:

- 1) The luxury tolling lanes will not speed traffic for most Marylanders'. This is social injustice.
- 2) Once the P3 bridge expansion with luxury tolling lanes plan is put into place there would be no turning back on extending the expansion and tolling around the beltway for the simple reason that the widened bridge would create a huge bottleneck where it connected with narrower portions of 495.
- 3) Handing the highway expansion project over to foreign corporate interests is a bad idea. Smaller tolls paid to Maryland and Federal Agencies by all crossing the bridge could pay for public investment in any improvements to the bridge.

We have a general concern regarding the negative impact of Single Occupancy Vehicles fueling climate change. Mass transit options are preferred.

Robert Soreng PhD  
President of the Washington Biologists' Field Club (<http://WBFC.science>)  
&  
Resident of Montgomery Co.  
5506 Uppingham St.  
Chevy Chase, MD 20815



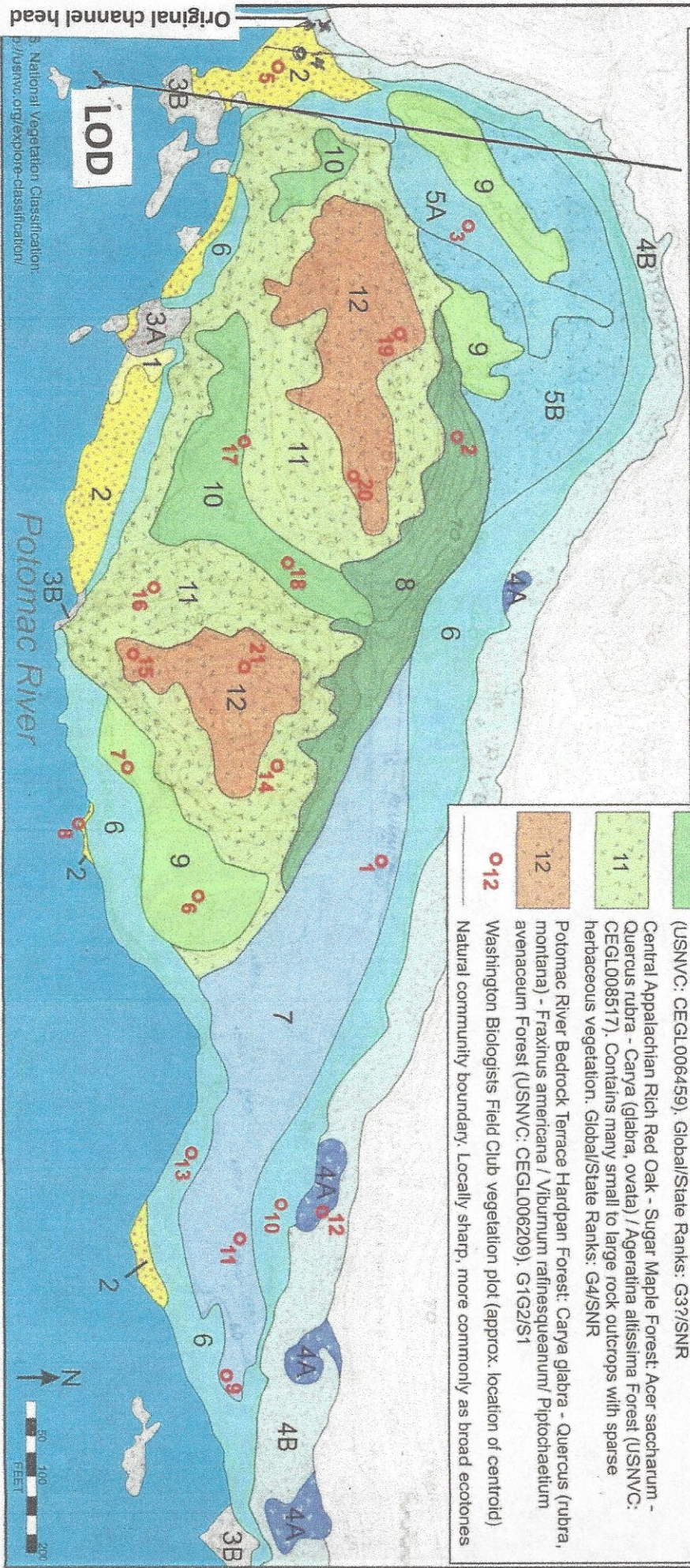




### Natural Communities of Plummers Island Montgomery County, Maryland by R.H. Simmons, A.H. Fleming, and R.J. Soreng, June, 2016

- 1** Piedmont / Central Appalachian Sand Bar / River Shore (Low Herbs Type): *Eragrostis hyemoides* - *Lindernia dubia* - *Ludwigia palustris* - *Cyperus squarrosus* Herbaceous Vegetation (USNVC: CEGL006483), Non-tidal mudflats. Global/State Ranks: G3/SNR
- 2** Piedmont / Central Appalachian Sand Bar / River Shore (Tall Herbs Type): *Eupatorium serotinum* - *Persicaria* (*lappathifolia*, *punctata*, *pennsylvanica*) Herbaceous Vegetation (USNVC: CEGL006481), Global/State Ranks: GNR/SNR
- 3A** / **3B** Potomac Gorge Riverside Outcrop Barren (Potomac Gorge Type): (*Hypericum proflificum*, *Eudorva racemosa*) / *Schizachyrium scoparium* - *Solidago racemosa* - *Ionactis linearifolia* Herbaceous Vegetation (USNVC: CEGL006491), Global/State Ranks: G2/S1, 3B: Other large rock outcrops in a similar setting
- 4A** / **4B** Piedmont / Central Appalachian Sycamore - River Birch Scour Woodland: *Platanus occidentalis* - *Betula nigra* - *Salix* (*caroliniana*, *nigra*) / *Apocynum sibiricum* Woodland (USNVC: CEGL003896), Global/State Ranks: G4G5/S4, Occurs within 4B: Intermittent river channel with sparse vegetation

- 5A** / **5B** Floodplain Terrace Forest: *Fraxinus pennsylvanica* - *Ulmus* spp. - *Celtis occidentalis* Forest in a moist, glade-like swale underlain by dark loamy alluvium. Similar to USNVC: CEGL002014. 5B: Same, with many inclusions of basic mesic forest (#9) on low, streamlined ridges of bedrock and sandy alluvium
- 6** Piedmont / Central Appalachian Silver Maple Forest: *Acer saccharinum* - *Acer negundo* / *Ageratina altissima* - *Laportea canadensis* - (*Elymus virginicus*, *Elymus magregorii*) Forest (USNVC: CEGL006217), Global/State Ranks: G4/S4
- 7** Piedmont / Central Appalachian Rich Floodplain Forest: *Platanus occidentalis* - *Acer negundo* - *Juglans nigra* / *Asimina triloba* / *Mertensia virginica* Forest • (USNVC: CEGL004073), Global/State Ranks: G4/S3
- 8** Central Appalachian / Piedmont Basic Mesic Forest (Twirlleaf - Blue Cohosh Type): *Acer* (*nigrum*, *saccharum*) - *Tilia americana* / *Asimina triloba* / *Jeffersonia diphylla* - *Caulophyllum thalictroides* Forest (USNVC: CEGL008412), Global/State Ranks: G4G5/S4
- 9** Coastal Plain / Outer Piedmont Basic Mesic Forest: *Fagus grandifolia* - *Liriodendron tulipifera* - *Carya cordiformis* / *Lindera benzoin* / *Podophyllum peltatum* Forest (USNVC: CEGL006055), Global/State Ranks: G4/S4
- 10** Mid-Atlantic High Terrace Hardwood Floodplain Forest: *Acer saccharum* - *Fraxinus americana* / *Carpinus caroliniana* / *Podophyllum peltatum* Forest (USNVC: CEGL006459), Global/State Ranks: G3/SNR
- 11** Central Appalachian Rich Red Oak - Sugar Maple Forest: *Acer saccharum* - *Quercus rubra* - *Carya* (*glabra*, *ovata*) / *Ageratina altissima* Forest (USNVC: CEGL008517), Contains many small to large rock outcrops with sparse herbaceous vegetation. Global/State Ranks: G4/SNR
- 12** Potomac River Bedrock Terrace Hardpan Forest: *Carya glabra* - *Quercus* (*rubra*, *montana*) - *Fraxinus americana* / *Viburnum rafinesquianum* / *Pipilochaetium avenaceum* Forest (USNVC: CEGL006209), G1G2/S1
- 012** Washington Biologists Field Club vegetation plot (approx. location of centroid) Natural community boundary. Locally sharp, more commonly as broad ecotones



5 National Vegetation Classification: <http://usnvc.org/explorer-classification/>











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UNITED STATES

DEPARTMENT OF THE INTERIOR

NATIONAL PARK SERVICE  
NATIONAL CAPITAL PARKS  
ENGINEERING BRANCH

TOPOGRAPHY

Key Bridge to Seneca Creek

GEO. WASH. MEM. PKWY. and CHESAPEAKE & OHIO CANAL

REGION

N.C.P.

WASHINGTON, D.C.

SHEET 19 OF 55

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