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CERTIFIED MAIL

November 9, 2020

Ms. Lisa B. Choplin, DBIA
Maryland Department of Transportation
707 North Calvert Street, Mail Stop P-601
Baltimore, Maryland 21202

Dear Ms. Choplin:

This letter is in response to the Draft Environmental Impact Statement (DEIS), from June 2020, by the Maryland Department of Transportation, and U.S. Department of Transportation, Federal Highway Administration. As members of the City of Rockville Traffic and Transportation Commission, and as city residents, we have significant interest in the I-495 and I-270 Managed Lanes project and submit the following comments:

This project, upon completion, will dramatically impact traffic, as well as the physical, and social ecology, of the City of Rockville. We are opposed to both the planned project and the manner in which it has been pursued by the State of Maryland. Based on the recent record of the State – including the Purple Line project and an under-utilized I-370 - we have concerns about the State's ability to manage any public/private transportation partnership in a manner that realizes acceptable public benefit.

Transit components are weak in the study with no standalone transit alternative. This project will induce automobile traffic before addressing choke points most responsible for delays and congestion – including reductions in lanes on I-270 north of Rockville and the American Legion Bridge. The resources being dedicated to the I-495 and I-270 Managed Lanes project once more prioritize automobile traffic over a truly multi-modal traffic system that is the desire of, and to the benefit of, both the citizens of Rockville and the surrounding region.

Projected average toll rate of between \$0.68 and \$0.77 per mile will be so high as to deter use for many¹. It, we believe, will be beyond the financial reach of many, especially during the peak periods when the rates are expected to be even higher. Ultimately these fees will be an exclusionary tax on lower and moderate-income persons who cannot afford the increase, yet will suffer from the higher congestion on the non-toll lanes. The inability of many to use toll lanes will severely limit the potential benefit of any modifications.

Failure of the DEIS to examine impacts on climate change and global warming is a glaring omission. The project, as a whole, is deeply problematic in relation to climate change, global warming, and the need to reduce greenhouse emissions. At a time when coastal areas of Maryland are feeling the impacts of increased tidal flooding and all areas of the State are being impacted by more severe weather, due to climate change, the absence of consideration is unacceptable to us.

¹ We suggest that the report provide information on comparative toll rates (per mile) for similar regional toll lanes

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There is no analysis of impact by proposed interchanges at Wootton Parkway and Gude Drive. The DEIS analysis predicts little to no benefit to local traffic congestion or wait times. We expect however, the interchanges will greatly increase traffic load, speeding, noise, and emissions in areas that are heavily residential. We also expect a resultant decrease in safety on these roads, especially for non-drivers, and that the interchanges will discourage use of alternative transportation modes, in particular bus ridership, biking, and walking.

There is insufficient analysis of impacts from noise² and air pollution. There is no study of the health impacts from increased noise and air pollution. Both air pollution and persistent exposure to ambient noise has been shown to have deleterious effects on health, including reducing expected lifespan. These impacts should be at the core of any environmental impact assessment and not ignored because they are difficult to forecast.

These are our major, but certainly not only, objections to the project. We consider to be flawed, backward looking in concept and potential design, and a poor use of public funds.

We appreciate having the opportunity to comment on the Draft Environmental Impact Statement (DEIS). We are happy to discuss these comments further with members of your staff. We ask the Maryland Department of Transportation and Federal Highway Administration take these concerns into consideration. We also endorse the stated position of the City of Rockville that the project not proceed.

Sincerely,

Alan Kaplan, Chairman
Jude Abanulo
Hua "Bill" He
Matthew Perkins
Marc Plante
Mike Stein
Ian Weston
Shu-Ying Wong

cc: Rockville Mayor and Council
Rob DiSpirito, City Manager
Craig Simoneau, PE, Director of Public Works
Day file

² We request that MDOT provide information on the location of noise receptor in the City of Rockville