



U.S. Department
of Transportation
**Federal Highway
Administration**

Maryland Division

July 18, 2022

31 Hopkins Plaza, Suite 1520
Baltimore, MD 21201

In Reply Refer To:
HAD- MD

The Honorable Bridget Donnell Newton
Mayor of Rockville
Rockville, MD 20850

Dear Mayor Newton:

Thank you for your letter to Secretary of Transportation Pete Buttigieg asking for reissuance of the Supplemental Draft Environmental Impact Statement (SDEIS) for the I-495 I-270 Managed Lanes Study. You and members of the City Council asked that the SDEIS be reissued to address the City of Rockville's concerns related to Environmental Justice (EJ), local roads, and greenhouse gas emissions (GHG).

The Federal Highway Administration (FHWA) published the Final Environmental Impact Statement (FEIS) on June 17, 2022, for a 30-day public availability period. The Record of Decision (ROD), which is the final administrative action in review of the project under the National Environmental Policy Act, is scheduled to occur following the availability period. This separation of the FEIS and ROD will allow time for all interested parties to review the FEIS and express any remaining concerns they may have. The Maryland Department of Transportation State Highway Administration (MDOT SHA) and FHWA will consider substantive comments received. The ROD will explain the basis for the decision and summarize any mitigation measures or community enhancements incorporated in the project.

The initial analysis of potential EJ impacts in the Draft Environmental Impact Statement (DEIS) focused on the entire study area, reflecting a broad geographic area surrounding the 48-mile study limits for the Build Alternatives assessed in the DEIS. The DEIS study area included I-495 from south of the George Washington Memorial Parkway in Fairfax County, Virginia, including the American Legion Bridge (ALB) across the Potomac River, to west of MD 5 in Prince George's County, Maryland; and I-270 from I-495 to I-370 in Montgomery County, including the east and west I-270 spurs north of I-495. Public and agency input expressed concerns about property impacts under the Build Alternatives analyzed in the DEIS, including considerable impacts to EJ populations.

As a result, MDOT SHA and FHWA identified the Preferred Alternative, Phase 1 South in the SDEIS, which substantially reduced the number and location of potentially impacted EJ populations analyzed in the DEIS. The Preferred Alternative Phase 1 South is 14 miles and focuses on the west side of I-495 including the ALB and I-270 from I-495 to I-370. The SDEIS disclosed impacts to the EJ populations in comparison to non-EJ populations. The FEIS summarizes the final technical analyses on impacts to both EJ and non-EJ populations and considered mitigation and community enhancements. Both beneficial and/or adverse impacts to EJ populations were considered in the EJ analysis. Based on the reasoning documented in the

SDEIS and FEIS, FHWA and MDOT SHA have determined that there are no disproportionately high and adverse impacts to EJ populations that would occur as a result of the I-495 and I-270 Managed Lanes Study Preferred Alternative.

The Preferred Alternative was evaluated and compared to the No Build condition in the design year of 2045 for several key operational metrics, including delay, travel time, speed, level of service, throughput, and the effect on the local network. These results have been updated in the FEIS to reflect the latest forecasts and design based on stakeholder input to further improve operations and/or minimize property and environmental impacts. The Preferred Alternative will significantly increase throughput across the ALB and on the southern section of I-270 while reducing congestion. Speeds along the I-495 inner loop and I-270 northbound are limited by downstream congestion at existing bottlenecks (i.e., along the inner loop from the I-270 east spur toward I-95 and along northbound I-270 north of the Phase 1 South limits where the highway reduces to two lanes). Some congestion would still be present during the PM peak period on I-270 northbound and the I-495 inner loop in the design year of 2045 due to downstream bottlenecks outside of the Preferred Alternative limits, but travelers on most corridors would experience significantly faster, more reliable trips.

The FEIS demonstrates that the net impact of the project will be an overall reduction in delay on the surrounding arterials (including a 4.8 percent decrease in delay on Montgomery County arterials), despite some localized increases in arterial traffic near the managed lane access points interchanges. Coordination between MDOT SHA and the City of Rockville resulted in additional improvements considered and incorporated where feasible, including modifications to the right-turning movement from the I-270 off-ramp onto eastbound MD 189, and additional turn lanes at Wootton Parkway at Seven Locks Road, Gude Drive at Research Boulevard, and MD 189 at Great Falls Road. All these enhancements will help manage and improve the function of the local roadway network based on 2027 and 2045 traffic volumes compared to the No Build Alternative. Improved direct and indirect connections to park and ride lots, Metrorail, bus and other transit facilities are anticipated to occur as a result of addressing congestion on these regional roadways, thus providing a system of systems approach to addressing overall transportation needs in the National Capital Region.

Regarding GHG emissions, MDOT SHA used the best available data, including an emissions model approved by the Environmental Protection Agency to estimate GHG emissions associated with the Preferred and No-Build Alternatives as detailed in the FEIS. The FEIS analysis shows GHG emissions under the Preferred Alternative are expected to decline in the Opening and Design years for all GHG pollutants when compared to existing conditions.

The FEIS also documents Maryland's commitment to reducing GHG and to preparing the State for the impacts of climate change. Statewide analyses do not indicate that the I-495 and I-270 managed lanes will impede Maryland's ability to meet its GHG emission reduction goals. In fact, the State's Greenhouse Gas Reduction Act (GGRA) Plan documents Maryland's existing and future emissions reductions under several scenarios, all of which include the I-495 and I-270 Managed Lanes Study. The GGRA document illustrates that Maryland will not only meet the 2030 goal of reducing GHG emissions by 40 percent, but the State is dedicated to exceeding that goal by striving for a 50 percent reduction by 2030.

The FEIS reflects the comments received from other agencies, local and State officials, citizens, and organizations. I can assure you that MDOT SHA and FHWA will carefully consider and address all substantive comments received on the FEIS.

Sincerely,

Gregory Murrill
Division Administrator