



MONTGOMERY COUNTY COUNCIL
ROCKVILLE, MARYLAND

Casey Anderson, Vice-Chair
The Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, MD 20910

May 9, 2019

Dear Mr. Anderson:

Montgomery County residents have grown increasingly concerned about the Maryland Department of Transportation's (MDOT) plans to widen the Capital Beltway and Interstate 270 as proposed in the I-495 & I-270 Managed Lanes Study. As the owner of a significant amount of property along the project right of way, the Maryland-National Capital Park and Planning Commission (M-NCPPC) is playing an important role in the project as a cooperating agency in the National Environmental Policy Act process required of this substantial project.

M-NCPPC has unique responsibilities as a cooperating agency that must be factored into its review of the Managed Lanes Study. M-NCPPC is both the owner of parkland held in trust for the residents of Montgomery County, and through the Planning Board, is the regional planning agency responsible for providing advice and recommendations on land use and transportation policy to the Montgomery County Council (acting as the District Council). Therefore, any decision made by M-NCPPC in connection with the Managed Lanes Study must take into account the need to protect our precious natural resources as well as the application of best practices in land use and transportation planning. These considerations are critical to the County Council as we balance the needs of the affected communities and approve local master plans that contribute to the development and well-being of our county.

In that vein, the Montgomery County Council, in a letter to Maryland Transportation Secretary Pete Rahn dated March 15, 2019, expressed specific concerns with the sequencing, screened alternatives, scope and impacts of the Managed Lanes Program (letter enclosed). To summarize, consistent with our land use and transportation plans, and in support of our environmental sustainability goals, **Montgomery County has**

advocated additional high-occupancy vehicle (HOV) or high-occupancy toll (HOT) lane capacity on the American Legion Bridge, continuing along I-495 to the western spur to I-270, and on I-270 to Frederick County. In addition, the Council believes that any project adding roadway capacity on I-270 and I-495 should be accompanied by additional state investment in transit along those corridors and the addition of transit options as an integral component of the project. The “highway-only” solution to congestion is counter to the county’s transit-first policy. Therefore, **we must insist at a minimum that MDOT include a substantial transit component** in all the build alternatives such as the Corridor Cities Transitway, and enhancements to the MARC Brunswick Line Service, and accommodating some form of rail infrastructure in the design of the rebuilt American Legion Bridge for current or future transit service.

Furthermore, the constrained section of I-495 east of the western spur should be examined only *after* the American Legion Bridge and I-270 to Frederick have been addressed. Consistent with Montgomery County’s most recent Transportation Priority Letter and approved transportation plans, improvements to that constrained section of I-495 should be limited to Transportation Systems Management without expanding beyond the current footprint of the highway.

Our parks along the Beltway and I-270 were damaged by the original construction of those roads. Our watershed has been compromised and has not been restored by receipt of stormwater mitigation funds. Our parks and watershed should not be further degraded by the widening of these highways.

In addition, at the time M-NCPPC reviews the mandatory referral for the Preferred Alternative, all impacts to parkland and appropriate mitigation measures must be fully enumerated, clarified and appropriately mitigated.

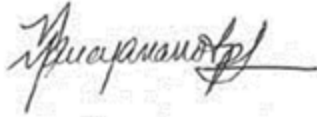
In response to widespread concerns from our constituents about the potential impacts of the proposed highway expansions on park properties, **we request that M-NCPPC decline to transfer any parkland to MDOT until:**

- **Receipt of an independent rating assessment survey to allow us to understand the fiscal risk to our taxpayers;**
- **Publication of a Final Environmental Impact Statement (FEIS) for I-495 that complies with the National Environmental Policy Act (NEPA), to give us a better understanding of the impacts of this proposal on natural resources including parks and stream valleys; and**

- **Receipt of the express consent of the Montgomery County Council.**

Thank you.

Sincerely,



Nancy Navarro
Council President



Sidney Katz
Council Vice President



Tom Hucker
Transportation Committee
Chair



Hans Riemer
Councilmember At-large



Gabe Albornoz
Councilmember At-large



Evan Glass
Councilmember At-large



Will Jawando
Councilmember At-large



Craig Rice
Councilmember, District 2



Andrew Friedson
Councilmember, District 1

Cc: Board of Public Works
Maryland Congressional Delegation
Montgomery County Senators
Montgomery Delegates
Prince George's County Council
Montgomery County Executive