

<u>Summary of Staff Recommendations for ARDS Non-Concurrence</u>

Among other things, the Purpose and Need document states that "MDOT SHA recognizes the need to <u>plan</u> and <u>design</u> the project in an environmentally responsible manner." Selection of the alternatives has narrowed the scope too much for environmental review to reach reliable conclusions about impact. Accordingly, staff has recommended non-concurrence for the following reasons:

- 1) <u>Segmentation and Phasing</u>. Identifying the need and scope of improvements to I-495 is dependent upon addressing whether by-pass or through traffic can be diverted to I-270 and drawn off of the constrained area of I-495 between I-270 and I-95. The phasing is an important factor because diverting traffic to use the ICC requires the I-270 phase to be complete first.
- 2) <u>Termini</u>. The Study Area in Montgomery County omits I-270 north of I-370 (from Rockville to Frederick), and in Prince George's County omits I-495 from MD 5 to the Woodrow Wilson Bridge. The impacts from those omitted areas will result in incomplete conclusions for environmental impact.
- 3) <u>Transit</u>. Meaningful, local serving transit and transportation demand management must be integral components of the project for any of the Alternatives to be studied.
- 4) <u>Parkland Management</u>. The public value in parkland extends to passive and active impacts recreation, stormwater management, water quality, etc. It is imperative for the study alternatives to attend and account for the Commission's parkland acquired either under the Capper-Cramton Act or the agency's other statutory responsibilities.