

I-495/I-270 Managed Lanes Update SDEIS

November 4, 2021

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Park and Planning Commission

► Timeline Update



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2021 TIMELINE OVERVIEW

January 2021
Present MDOT RPA to the Public

May 2021
Present MDOT Revised RPA to the Public

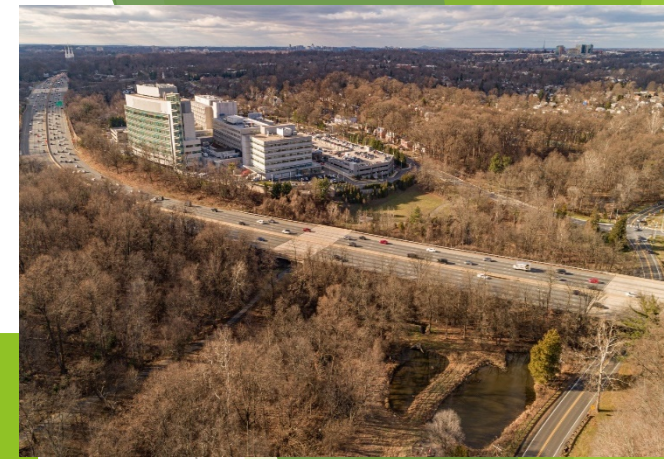
June 2021
Agency Concurrence Requested on the Revised RPA

October 2021/November 2021
Publish SDEIS
45-Day Comment Period
Virtual Hearings

January 2022
Review Administrative Draft FEIS
March 2022
Planning Board Approval of Park Mitigation Plan

May 2022
Publish FEIS
June 2022
Public ROD

July 2022
Mandatory Referral Hearing #1
Spring 2023
Mandatory Referral Hearing #2



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FALL 2021 Activities



SDEIS PUBLISHED OCTOBER 1, 2021



45-DAY COMMENT PERIOD
OCTOBER 1 – NOVEMBER 15, 2021



VIRTUAL PUBLIC HEARING
OCTOBER 1 – NOVEMBER 15, 2021



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► Major Issues Update



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MAJOR ISSUES OVERVIEW

Parkland Impacts and Mitigation

Environmental Justice /
Historic and Cultural Impacts and
Mitigation

Shifting Bottleneck Issues Related
to Project Design

Local Road Impact Analyses

Stormwater Management



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Major Issues Update

1. Environmental Justice

- ▶ The DEIS and now the SDEIS has provided inadequate analysis and no proposed mitigation of environmental justice impacts.
- ▶ The SDEIS indicates that environmental justice issues omitted from the SDEIS will be remedied in the FEIS, which is not a best practice and obstructs public comment and community input since the FEIS comes at the end of the process.



Major Issues Update

2. Shifting Bottleneck Issues Related to Project Design

Staff Recommendations

- a. Phase 1A and 1B should be constructed concurrently to reduce or eliminate bottlenecks on I-270.
- b. For the other bottleneck issues, we recommend the following design changes to the Preferred Alternative:
 - i. Eliminate the managed lanes from the I-270 Eastern Spur between I-270 and I-495 because I-270 traffic headed south to the eastern spur would not use the managed lane network. The managed lanes would provide minimal travel time benefits for drivers from Gaithersburg and Rockville to most Montgomery County destinations.
 - ii. Eliminate the managed lanes and exit/entrance ramps from I-495 between the two spurs.
 - iii. Managed lane traffic destined to and from the Inner Loop should enter/exit the managed lane network at the River Road crossover interchange.



Major Issues Update

3. Local Road Impact Analyses

- ▶ The Interchange Access Point Approval (IAPA) study now under development must be extended beyond a single intersection since the increased congestion on I-270 and I-495 will undoubtedly lead to both peak spreading effects and local traffic diversions that have not been adequately considered to-date.
- ▶ When it can take over 30 minutes to travel 2 to 3 miles on some segments of the Beltway as presented in this SDEIS, traffic will not subject themselves to this on a daily basis, and they will find the shorter travel time route, regardless of local street impact. For this reason, the IAPA study should be extended beyond a single intersection from the highway entrance.



Major Issues Update

4. Parkland LOD

- ▶ Significant comments addressing deficiencies in the proposed Limits of Disturbance (LOD) have not been addressed and continue to be pushed off to future project milestones. Issues include required avoidance and minimization measures and addressing existing highway impacts that will only be exacerbated by adding additional lanes to the network.
- ▶ Once MDOT SHA awards a contract to an outside firm to undertake the project, there is a clear risk that the LOD will need to change from what is reflected in the SDEIS. The project still needs to identify an efficient mechanism to make changes to the LOD as part of the project development process that demonstrates a commitment to further avoid resource impacts and responsibly address issues that will only be fully understood once more detailed design begins.



Major Issues Update

5. Storm Water Management

- ▶ Storm Water Management (SWM) plans proposed by MDOT SHA continue to target only the minimum legal requirements and fall well short of State goals set for onsite water quality treatment. A project of this caliber should be held to a standard that achieves a net benefit to the receiving waters.
- ▶ The existing highways are among the worst water quality offenders in Montgomery County and are not addressed with the proposed plan. Any off-site Compensatory SWM being leveraged by the project must be implemented in close proximity to the impacts, regardless of the owner. SWM opportunities should not be eliminated due to their location on Parkland.



Major Issues Update

6. Inadequate 4(f) Mitigation Plan for Natural Resources

- ▶ M-NCPPC will require a thorough and implementable mitigation package to include park enhancements and extensive parkland replacement. The parkland affected by this project has significant value due to its geographic location in a largely developed area with little “unused” land. Meaningful mitigation commitments and progress are absent from the SDEIS and significant advancements are necessary prior to publication of the FEIS.
- ▶ A Parkland Mitigation Plan for impacts resulting from the proposed Phase 1 South RPA will need to be approved by the Planning Board. When staff is satisfied with a plan proposed by MDOT/SHA, it will be brought for review and approval before the FEIS is published.



Major Issues Update

7. Inadequate 4(f) Mitigation Plan for Historical and Cultural Resources

- ▶ Section 4(f) requires avoidance of the use of historical and cultural resources unless other alternatives are demonstrated to be infeasible and contrary to the purpose and use of the undertaking.
- ▶ There has been some additional investigation in the form of GPR (Ground Penetrating Radar) in a limited area of the Moses Hall Tabernacle and Cemetery, but additional investigation is needed in order to establish the location of gravesites. MDOT SHA has made a commitment that no gravesites will be disturbed but they can only honor this commitment if they know where the gravesites are located.
- ▶ In addition, no updated programmatic agreement has been provided yet for Section 4(f) use of the Moses Hall Tabernacle and Cemetery, the Gibson Grove Church, and the Carderock Springs National Register Historic District.



Major Issues Update

8. Priority Bicycle and Pedestrian Connections to Remove Barriers and Provide Connectivity

- ▶ Congress passed a once-in-a-generation investment in infrastructure throughout the U.S. with bi-partisan support. Included in the measure is a commitment to “Reconnecting Communities,” a concept that was not mentioned in the SDEIS.
- ▶ While the project has the potential to improve pedestrian and bicycle connectivity across the freeways that was severed when I-495 and I-270 were initially constructed, in many instances they make it harder to improve pedestrian and bicycle connectivity because they do not provide space to accommodate sidewalks and bikeways.
- ▶ In the SDEIS, MDOT SHA has made a commitment to priority bicycle and pedestrian connections to remove barriers and provide connectivity for bicyclists and pedestrians consistent with connections identified in the Montgomery County and City of Rockville master plans and priorities.





Questions



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