

City of Greenbelt
Department of Planning and Community Development
15 Crescent Road, Suite 200, Greenbelt, Maryland 20770
(301) 345-5417 Fax (301) 345-5418

Memorandum

TO: Ms. Nicole Ard, City Manager
VIA: Terri Hruby, Director of Planning and
Community Development
FROM: Molly Porter, Community Planner
DATE: August 3, 2020
RE: I-495 & I-270 Managed Lanes Study Draft
Environmental Impact Statement Overview

Background:

On July 10, 2020 the Federal Highway Administration (FHWA) and the Maryland Department of Transportation State Highway Administration (MDOT SHA) released the Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation for the I-495 & I-270 Managed Lanes Study. Comments on this study will be accepted until October 8, 2020.

The stated purpose of the DEIS is to, “provide a detailed description of the Study Purpose and Need, reasonable alternatives, the existing environmental conditions, and the analysis of the anticipated beneficial and adverse environmental effects and consequences of the alternatives, and potential mitigation.”

The DEIS analyzes seven (7) different alternatives:

- Alternative 1: No Build
- Alternative 8: 2-Lane, Express Toll Lane (ETL) Managed Lanes Network on I-495 and 1-ETL and 1-Lane High Occupancy Vehicle (HOV) Managed Lane on I-270
- Alternative 9: 2-Lane, High Occupancy Toll (HOT) Lanes Network on both I-495 & I-270
- Alternative 9 Modified (9M): 2-Lane, HOT Managed Lanes Network on west and east side of I-495 and on I-270; 1-Lane HOT Lane on top side of I-495
- Alternative 10: 2-Lane, ETL Managed Lanes Network on I-495 & I-270 plus 1-Lane HOV Lane on I-270 only
- Alternative 13B: 2-Lane, HOT Managed Lanes Network on I-495; HOT Managed,

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Reversible Lane Network on I-270

- Alternative 13C: 2-Lane, ETL Managed Lanes Network on I-495, ETL Managed, Reversible Lane Network and 1-Lane HOV Lane on I-270

Throughout the review of this project the City has advocated against the widening of the Capital Beltway (I-495) due to the significant impact this would have on the natural, socioeconomic, cultural, and built environments. The City has advocated for the State to study and identify alternative congestion relief approaches, including dedicating more funding to transit and other alternative modes of transportation.

The transit alternatives that were included in the preliminary range of alternatives are no longer under consideration in the DEIS. With respect to transit, the DEIS states that buses would be permitted to free usage of the managed lanes and direct and indirect connections to existing transit stations and planned Transit Oriented Development would be accommodated.

Financial Viability:

The Managed Lanes project was introduced with the promise that it would come at no expense to taxpayers and that the private sector would bear the financial responsibility. In the last few months the City learned of an unexpected cost responsibility that would be borne by WSSC ratepayers in Prince George's and Montgomery Counties. In a March 12, 2020 presentation representatives from WSSC detailed that the cost to be borne by ratepayers would range from \$1.3 billion to \$2.0 billion.

The DEIS details preliminary construction costs for all of the remaining alternatives. This analysis considered the preliminary capital costs, initial revenue projections, preliminary operations and maintenance costs, and the likely methods for how construction phases would be financed. A preliminary estimate is provided for each alternative for low, mid, and high capital costs. The study shows that a needed State subsidy could range from \$482 million to \$1,088 million. The study states, "If a state subsidy is required, it would typically be paid to the developer at the beginning of the contract, whereas if positive excess cashflows are anticipated, they could be paid to the State at the beginning of the contract and/or as revenue sharing payments to the State during the operation of the facility."

Tolling:

All of the remaining Build Alternatives would operate under a dynamic tolling approach for the managed lanes for the full length of the study. The study defines a dynamic



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tolling approach as one where, “the toll rates would change in response to real-time variations in traffic conditions such as travel speeds, traffic density, and traffic volumes.” The cost range for the toll rates has not been determined at this time. The DEIS outlines the process for setting the toll rate range which includes a traffic and revenue study, 60-day public comment period, and approval by the MDTA Board Members.

The toll rate will be determined to accomplish three (3) goals: managed traffic demand and congestion on the I-270 and I-495, ensure a minimum average operating speed of 45 miles per hour within the overall managed lanes system, and ensure maximum volumes are not exceeded in the managed lanes. The study anticipates that the average daily toll rates would range between \$0.68/mile to \$0.77/mile depending on the selected alternative.

Section 4(f) Properties:

A Section 4(f) property is “publicly-owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of an historic site of national, state, or local significance.” In total the study identified that the total potential impacts to Section 4(f) Properties, including park and historic properties range from 144.7 acres to 149.0 acres.

Under Section 4(f) of the US Department of Transportation Act of 1966, the FHWA cannot approve a transportation project that uses Section 4(f) property unless: there is no feasible and prudent avoidance alternative to the use of land from the property, and the action includes all possible planning to minimize harm to the property resulting from such use or the use of the Section 4(f) properties, including any measures to minimize harm (such as avoidance, minimization, mitigation or enhancement measures) committed to by the applicant will have a *de minimis* impact on the property. A *de minimis* impact is defined as one that will not adversely affect the activities, features, or attributes that qualify the resources for protection under Section 4(f).

Within the study corridor area 111 Section 4(f) Properties have been identified. Of these 111 properties, five (5) are located in the City of Greenbelt and have been determined to be Section 4(f) properties with use. These properties are the Greenbelt Historic District, Buddy Attick Lake Park, Indian Springs Park, McDonald Field, and Greenbelt Park. FHWA intends to apply *de minimus* impact findings for the Greenbelt Historic District, Buddy Attick Lake Park, McDonald Field, and Indian Springs Park because, “many of the anticipated uses of Section 4(f) properties consist of minor impacts along the edge of the properties in question adjacent to the existing transportation facility.” The study outlines that upcoming coordination with the City will include, “Draft Section

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4(f) Evaluation review of City properties.”

Environmental Resources, Consequences & Mitigation:

Chapter 4 of this document, “presents an overview of the socio-economic, cultural, natural, and other environmental resources along the study corridors, the anticipated effects to those resources, and a preliminary assessment of measures to avoid, minimize, and mitigate unavoidable effects to these resources.”

Throughout this review process the City has continually voiced a concern that the impact on greenhouse gas emissions and air pollution was not included in the screening criteria. The DEIS claims that, “the Build Alternatives are not predicted to increase emission burdens compared to the No Build Alternative in 2040, aside from a slight increase in GHG emissions.” This prediction is based on the projection that vehicles will become more energy efficient and that additional lanes will reduce congestion and increase speeds. The topic of greenhouse gas emissions requires further study to fully understand the impacts this project will have on the region.

Concerns have also been raised consistently about the impact on established adjacent neighborhoods and the loss of existing homes and businesses. The DEIS provides additional detail about these impacts. The study details that Alternative 9M would result in 29 full property acquisitions (25 residential relocations and four business relocations). Alternatives 8, 9, 10, 13B, and 13C would each result in 38 full property acquisitions (34 residential relocations and four business relocations). The Build Alternatives would impact between 313.4 and 337.3 acres of right-of-way from properties adjacent to the existing I-495 and I-270 roadway alignments.

Strong concerns have also been raised about the impacts that this project would have on wetlands and waterways in the study area. The DEIS states that, “Direct impacts to wetlands and waterways associated with construction of the Build Alternatives include fill from roadway and interchange construction, drainage improvements, and temporary construction-related activities.” The study found that 16.1 to 16.5 acres of wetlands and 155,229 to 156,984 linear feet of streams have the potential to be affected.

It is also important to note that this project would impact 1,477 to 1,515 acres of forest canopy. These impacts would include the physical removal and disturbance of vegetated areas, including forests, for land needed for construction.

The Study also provides information about the significant impacts to the Baltimore Washington Parkway (BW Parkway). During their coordination with MDOT SHA and



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FHWA, the National Park Service provided comments about having no direct access to BW Parkway in response to the draft options for avoiding Greenbelt Park, BW Parkway, and Suitland Parkway. In response to these comments a traffic analysis to determine the implications of no direct access on I-495 and BW Parkway was completed. This analysis showed that direct access was needed to meet the Study's Purpose and Need. The Build Alternatives now include the realignment of the ramp from eastbound Greenbelt Road to southbound Baltimore-Washington Parkway.

It is anticipated that 69.3 acres of the BW Parkway will be impacted by the Build Alternatives. The study also identifies the known adverse effect on the BW Parkway as "limits of disturbance impacts to contributing features and diminishment of the integrity of setting and association." The City has consistently raised concerns about the impacts this project will have on the BW Parkway due to the original intent of the scenic highway and aesthetic underpinnings.

Conclusion:

The DEIS outlined the significant impacts that this project would have on the natural, socioeconomic, cultural, and built environments. This study also provides greater information on the potential costs of this project that were not initially anticipated.

In addition to these negative impacts it is not currently known how travel patterns will continue to be affected in the future by COVID-19. Understanding these impacts is critical for this project. Virtual public hearings on this project are scheduled for August 18th, August 20th, August 25th, and September 3rd. In-person hearings are also scheduled for September 1st and September 10th.

City Staff plans to continue reviewing the DEIS and will be reaching out to neighboring jurisdictions to share comments and concerns. Staff anticipates bringing this item back to City Council prior to the October 8, 2020 comment deadline. At that time staff will present a draft letter of formal comments with the recommendation that City Council transmit this letter before the end of the DEIS comment period.

