



October 18, 2021

Stephanie Pollack
Acting Administrator
Federal Highway Administration
1200 New Jersey Ave. SW
Washington, DC 20590

Subject: I-495 & I-270 Managed Lanes Study

Dear Administrator Pollack:

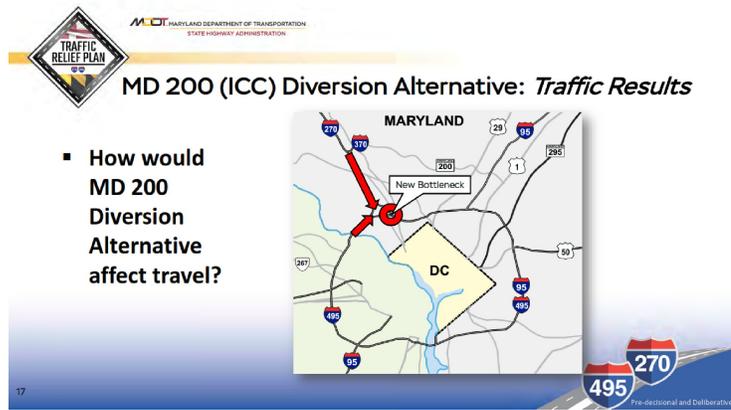
On October 1, FHWA and the Maryland Dept. of Transportation issued a Supplemental Draft Environmental Impact Statement for the I-495 & I-270 Managed Lanes Study. The subject of the SDEIS is a new alternative, not addressed in the DEIS, which adds toll lanes from the George Washington Bridge in Virginia to I-370 in Maryland. MDOT has selected this as the Preferred Alternative, leaving the choice of alternative for the remainder of I-495 undetermined.

The SDEIS contains no valid information on how the Preferred Alternative will affect vehicle movement because its traffic model is invalid. The output of the SDEIS's traffic model is contrary to common sense, logic, and traffic forecasting done by MDOT itself before Maryland suddenly reversed its policy. As a result, the SDEIS provides no basis for determining whether the Preferred Alternative satisfies the project's Purpose and Need, what the air pollution and noise impacts will be, and whether it will disproportionately harm Environmental Justice populations.

We therefore request that you withdraw the SDEIS and instruct MDOT to identify the causes of the traffic model's failure, develop a valid model, and reissue the SDEIS with an explanation of the reasons for the previous failure and a thorough validation of the new model.

A key location where the SDEIS traffic model fails spectacularly is the merge at Wisconsin Avenue where the I-270 east spur meets the Capital Beltway. This is already one of the most congested parts of the Beltway. It is obvious that feeding in three more lanes of traffic (two from the Beltway and one from I-270), without adding capacity at the merge point, will worsen congestion there. This is a crucial difference between the new Preferred Alternative and the build alternatives studied in the DEIS, which all increase capacity at that merge point.

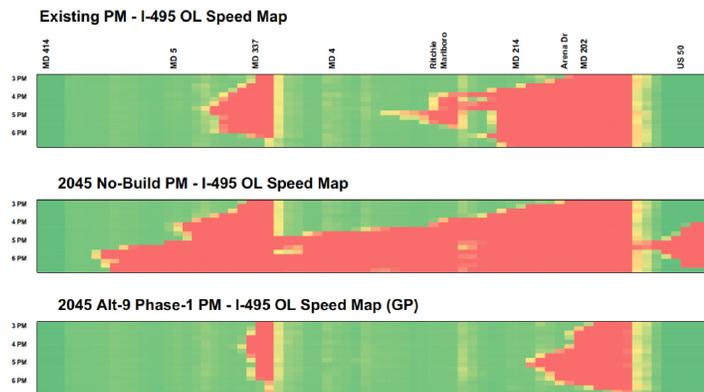
MDOT said just that on November 7, 2019. At that time, the Maryland agency was resisting demands for the DEIS to study an “ICC diversion” alternative that would add toll lanes to I-270 and the American Legion Bridge but not widen the Beltway at the Wisconsin Avenue merge. MDOT told the National Capital Planning Commission that this would create a “New Bottleneck” at the merge point. The slide on the right is from MDOT’s presentation to NCPC.



But then there was a sudden policy reversal. In May of this year, MDOT announced its new Preferred Alternative – with the Beltway no longer widened at the merge. The “New Bottleneck” then vanished.

According to the SDEIS, in the evening rush hour from 3:00 to 7:00, when congestion is at its worst, 400 fewer eastbound vehicles will pass through the merge if the toll lanes are built than if they aren’t. To the east on the Inner Loop, between Georgia Avenue and I-95, the model predicts even larger drops in traffic volume. This leads the model to conclude that Inner-Loop traffic in Montgomery County will get worse where the highway is widened and get better where it is not.¹ These model outputs are contrary to common sense.

The SDEIS model also predicts that the Preferred Alternative will reduce evening rush-hour traffic volumes by up to 4% on the northbound Beltway south of US 50 in Prince George’s County, nearly eliminating congestion there. A 4% reduction in traffic is also predicted for US 50 toward Annapolis. There is surely something deeply wrong with a model that shows traffic jams vanishing in Prince George’s County when a highway is widened on



Detail from SDEIS, Appendix A, page 127

¹Table 4 of Appendix A states that the Travel Time Index worsens from 6.6 to 6.9 in the untolled lanes west of I-270 but improves from 4.8 to 3.0 between I-270 and I-95.

the other side of Washington.²

These are not the only inexplicable model forecasts. A widespread decline in traffic headed out of Washington toward the northeast during the evening rush hour is predicted if the Preferred Alternative is built, compared to no-build. The model predicts fewer vehicles headed outbound from every Beltway interchange from US 29 to US 50, except for a small increase on I-95. The traffic forecast for the College Park-Greenbelt area is especially dubious – 15.9% fewer cars on Kenilworth Avenue, 12.8% on Route 1, and 9.9% on the Baltimore-Washington Parkway.

Added capacity due to construction of the toll lanes on I-270 cannot be the cause of the reduction in outbound evening traffic between US 29 and US 50 predicted by the model. While I-270 and the ICC are an alternative route that will draw some traffic away from US 29 and I-95, they are not a reasonable alternative for people driving toward Annapolis. Moreover, the predicted increase in traffic exiting northbound I-270 onto I-370 toward the ICC, 1515 vehicles, is much smaller than the 5095-vehicle decline that is predicted for outbound traffic in the US29-to-US50 sector.

Model-predicted change in outbound rush hour traffic

| Highway | No. of Vehicles | Percentage Change |
|---------|-----------------|-------------------|
| US 29 | -340 | -2.9% |
| MD 193 | -190 | -2.6% |
| MD 650 | -395 | -3.8% |
| I-95 | +530 | 1.6% |
| US 1 | -950 | -12.8% |
| MD 201 | -1,090 | -15.9% |
| MD 295 | -1,395 | -9.9% |
| MD 450 | -35 | -0.3% |
| US 50 | -1,230 | -4.1% |

When a model exhibits such severe and pervasive errors, none of its output can be trusted. Such a model is not a credible basis for federal decision-making. It must be corrected.

The necessary first step in fixing the model is to identify the root cause of its failure. One possible explanation to consider is a discrepancy in the input data, erroneously telling the model that fewer home-to-work trips originate in the Greenbelt-Laurel-Bowie area in the Preferred Alternative than in the No-Build alternative. That would explain the otherwise mysterious predictions that the Preferred Alternative will reduce evening rush-hour traffic volumes traveling toward that area from all directions – northbound on the Outer Loop in Prince George’s County, eastbound on the Inner Loop in eastern Montgomery County, and outbound from D.C. (inside and outside the Beltway) throughout northern Prince George’s County.

Comparison of alternatives, the fundamental purpose of an Environmental Impact Statement, is impossible when the traffic model lacks all credibility. Moreover, the public cannot intelligently comment on key aspects of the environmental analysis – among them whether the Preferred Alternative satisfies the Purpose and Need, air and noise pollution, and whether the project will

²The SDEIS, on page 3-10, absurdly explains the model output showing less congestion on the Beltway Outer Loop in Prince George’s County as a consequence of cars no longer backing up from I-270 in Bethesda.

help or harm Environmental Justice populations. We therefore request that you withdraw the Supplemental Draft Environmental Impact Statement and reissue it with a corrected and thoroughly validated traffic model.

Sincerely,

Benjamin Ross, Chair³
[Maryland Transit Opportunities Coalition](#)

Barbara Coufal, Co-Chair
[Citizens Against Beltway Expansion](#)

Janet Gallant and Sally Stolz, Coordinators
[DontWiden270.org](#)

cc: Senator Ben Cardin
Senator Chris Van Hollen
Rep. Jamie Raskin
Rep. Anthony Brown
Elizabeth Hewlett, Chair, M-NCPPC
Casey Anderson, Chair, Montgomery County Planning Board

³Please direct any technical questions or correspondence to Dr. Ross at [REDACTED] or [REDACTED].