



**MONTGOMERY COUNTY COUNCIL**  
ROCKVILLE, MARYLAND

October 27, 2021

Jeanette Mar  
Environmental Program Manager  
Federal Highway Administration, Maryland Division  
George H. Fallon Federal Building  
31 Hopkins Plaza, Suite 1520  
Baltimore, MD 21201

Jeff Folden  
Deputy Project Director  
I-495 and I-270 P-3 Project Office  
Maryland Department of Transportation State Highway Administration  
707 North Calvert Street, Mail Stop P-601  
Baltimore, MD 21202

Dear Ms. Mar and Mr. Folden,

We are writing to ask for an extension of the comment period on the I-495 & I-270 Managed Lanes Study Supplemental Draft Environmental Impact Statement (SDEIS) required by the National Environmental Policy Act. Preparation of an SDEIS was required due to a major change in scope of the project. The SDEIS was issued for public comment on October 1 with a 45-day comment period and a November 1 hearing date.

[Serious questions](#) have been raised about the validity of the traffic modeling that underpins the SDEIS, which focuses on the new project scope (Phase 1 South). The traffic modeling feeds into toll rate assumptions, financial assumptions, and congestion, air quality, and noise impacts, so errors in the traffic modeling affect determination of impacts across a wide range of types.

We need time for our county's transportation and planning staff to independently analyze the traffic effects of this project.

The comment period for the SDEIS has been set at 45 days, which is 78 days shorter than the comment period for the earlier Draft Environmental Impact Statement (DEIS). This compressed time period of 45 days does allow our county staff time for meaningful review and comment.

Our constituents, including over 40 [stakeholder groups](#), the City of Rockville, and [citizen groups](#), have already raised concerns and requested a longer comment period. Among the reasons are that the 8,000-page SDEIS cross-references a 19,000-page DEIS and that multiple comment periods (Section 106 and toll rate range setting) for the project have overlapped the current SDEIS comment period. The COVID epidemic and delta variant also present difficulties for review and information sharing with affected groups. Furthermore, the project is highly [controversial](#), may not address [congestion](#), and has known adverse impacts on communities, environment, and nationally and internationally important historic sites.

We support our constituents' reasonable requests for comment period extension, and we need the extension to conduct our own traffic analysis given the questionable validity of the traffic modeling used in the SDEIS.

We strongly urge the agencies to extend the comment period until the questions about the validity of the traffic model have been resolved with a minimum of 120 days. We also suggest there be at least two hearing dates after the traffic modeling issue has been resolved.

Thank you for your prompt attention to this matter.

Sincerely,



Tom Hucker  
Council President



Gabe Albornoz  
Council Vice President



Evan Glass  
Councilmember At-Large



Will Jawando  
Councilmember At-Large



Sidney Katz  
Councilmember District 3



Nancy Navarro  
Councilmember District 4