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May 15, 2024

Ms. Christina Henderson, Chair  
Transportation Planning Board  
Metropolitan Washington Council of Governments  
777 North Capital Street NE, Suite 300  
Washington, DC 2002

Mr. Paul J. Wiedefeld, Secretary  
Maryland Department of Transportation  
7201 Corporate Center Drive  
Hanover, Maryland 21076

SUBJECT: Visualize 2050 and proposed I-270 Op Lanes

Dear Chair Henderson and Secretary Wiedefeld:

The City of Rockville (City) appreciates the opportunity to meet with your team on to discuss our concerns regarding Segment D of the I-270 Op Lanes project in the Transportation Planning Board's (TPB) Visualize 2050 Air Quality Conformity Analysis. While progress has been made, we need to reaffirm our opposition to managed toll lanes along I-270 within the Rockville City limits, which would take currently free lanes and convert to paid toll lanes and convert HOV2 to HOV-3 lanes. The City of Rockville continues to request that the Maryland Department of Transportation (MDOT) remove [Segment D](#) (from I-270 spur to I-370) from the Transportation Planning Board's (TPB) Visualize 2050 Air Quality Conformity Analysis. Without a meaningful approach by MDOT to more strongly protect Segment D from tolls now and in the future, provide sound wall barriers as well as further engage with the community regarding how the phased approach proposed in the plan would impact the City, the City cannot support its inclusion in Visualize 2050. Over the course of this project, the City has raised numerous concerns regarding the expanded freeway and toll lanes to various entities, including the Maryland Governor's Office, MDOT, the U.S. Department of Transportation, and the MWCOG Transportation Planning Board. Issues and considerations still needing to be addressed are included in Attachment A.

The City recognizes and appreciates that MDOT has indicated it will "deemphasize" the I-270 segment in Rockville, however, the April 17, 2024, Transportation Planning Board meeting materials (dated March 29, 2024) show Segment D as unchanged with its inclusion in the plan. The City requests that Segment D of the I-270 project be removed so collaboration with regional stakeholders can occur and additional mitigations be proposed, similar to Segment E. The City supports Visualize 2050's proposed recommendation to study Segment E. The City requests a similar recommendation for Segment D if removal does not occur, and supports efforts to clarify its status as deemphasized until 2045. Simply stating it is deemphasized does not assume the necessary mitigation will be performed. While the City will not support a version of the plan that includes Segment D, we appreciate MDOT's agreement to modify the implementation date for Segment D to 2045 from 2040; and the emphasis put on re-engaging with Rockville as noted in the Resolution to be introduced on 5/15 that commits MDOT to reengage with Rockville before any work begins.

Managed toll lanes will result in additional vehicle traffic on I-270 through Rockville; as well lead to more traffic on MD 355 and City neighborhood roads when people try to avoid paid toll lanes and increased traffic in the free lanes and increase noise for residents and businesses along the I-270 corridor. Eliminating the High Occupancy Vehicle (HOV) two+ travel lane on I-270 and replacing it with High Occupancy Toll

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Monique Ashton

COUNCILMEMBERS  
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Marissa Valeri  
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ACTING CITY MANAGER  
Craig Simoneau

CITY CLERK/DIRECTOR OF  
COUNCIL OPERATIONS  
Sara Taylor-Ferrell

CITY ATTORNEY  
Robert E. Dawson

(HOT) three+ lanes is a significant concern. This represents a tangible impact to Rockville residents who will be required to pay to use the HOT lane. The managed toll lanes will introduce more vehicle traffic in the region by only directly helping to alleviate the issue for those who can regularly pay the toll, creating equity concerns for low-income residents and those who live further from the city center because of high housing costs.

Prior to the I-270 Op-Lanes project, the City of Rockville and MDOT SHA had coordinated on a Type 2 noise barrier along I-270 within the city and abutting the Woodley Gardens neighborhood. This area was studied, and it was determined that the noise generated by I-270 traffic warranted a Type 2 noise barrier. This finding was made prior to the I-270 Op Lanes project. The level of noise generated by new traffic using the toll lanes will further exceed acceptable thresholds, to the detriment of the Woodley Gardens community. Unfortunately, the City has been long awaiting the promised noise barrier project and this issue must still be addressed.

The City recognizes the impacts of traffic congestion on the region as well as the need to alleviate congestion in the immediate term in certain areas, such as along the American Legion Bridge. However, a regional toll lane network will perpetuate many of these issues in the long term. The City cannot support the Visualize 2050 Plan if Segment D is included for construction and will vote against the current Plan since it does not represent the will of the community. However, we acknowledge and thank MDOT for their continued coordination and open discussions with the City in recent weeks and we look forward to continued engagement with MDOT.

Sincerely,

 _____ Monique Ashton, Mayor	
 _____ Kate Fulton, Councilmember	 _____ Izola (Zola) Shaw, Councilmember
 _____ Barry Jackson, Councilmember	 _____ Marissa Valeri, Councilmember
 _____ David Myles, Councilmember	 _____ Adam Van Grack Councilmember

City of Rockville Mayor and Council

BBW/EE/kmc

Attachment A

cc: Mayor and Council  
Day file

## **Attachment A**

The City of Rockville (City) has submitted multiple letters discussing the I-270/I-495 widening and managed lanes project between May 2018 and the present. Recipients of these letters included the Maryland Governor's Office, the Maryland Department of Transportation, the U.S. Department of Transportation, the Federal Highway Administration, the MWCOG Transportation Planning Board, and the Army Corps of Engineers. These letters provided the city's response and comments to impact determinations, public comment requests for the Draft and Final Environmental Impact Statement, concerns raised about environmental justice and sustainability, and issues related to the project and its process.

The below list includes issues raised in the letters that have not yet been fully resolved. Each issue below is quoted from the city's letters on the project and organized by topic. The full text of the letters as well as a statement to City of Rockville residents are available on the city's website at <https://rockvillemd.gov/2371/I-495-and-I-270-Managed-Lanes-Project>.

### **Property Impacts**

- The Mayor and Council advocate against any project that does not protect the homes, businesses and infrastructure of the nine Rockville neighborhoods that abut I-270 from being affected. Many residents are anxious about the uncertainty surrounding their homes, neighborhood, and community.
- The City remains strongly opposed to any alternative that will take residences, businesses or infrastructure, or include multi-parcel takings, or any potential loss of City property in order to add lanes or widen I-270 in either direction through Rockville. It is essential that the State understands that leaving a home untouched, while potentially taking a portion of a yard, playground, park, or other amenity would damage our community.
- In April 2022, the city concurred that the project would have *de minimis* Section 4(f) impacts on three (3) parks owned and managed by the City: (i) Rockmead Park, (ii) Woottons Mill Park, and (iii) Rockville Senior Center and Park. The concurrence was contingent upon (i) delivery to the City of the mitigation commitments by MDOT, including 7.22 acres of specific replacement parkland across four separate properties, and (ii) incorporation of context-sensitive design solutions. These commitments were intended to compensate the City for the 5.4 total acres of City-owned parkland to be affected by the Proposed I-495 / I-270 Project—should the Project proceed beyond a Record of Decision.
- At no point from the beginning of this project has MDOT explained how they will deal with the taking of city assets such as the bridges at Gude Drive and Wootton Parkway, as well as the bike bridge at MD 28, and how the city will be compensated.

### **Traffic Impacts**

- The traffic study is flawed because it neglected the impact of the pandemic altogether and the Travel Demand Model assumed traffic volumes will resume to pre-COVID levels and then further increase. There are doubts about the Travel Demand Model used to project 2040 traffic volumes and patterns. Travel habits and the extensive use of video meetings as well as the wide acceptance of teleworking during recent months suggest that travel demand models should be revised taking into consideration all recent changes and project future demand accordingly.
- The City has concerns about the wider traffic impact of this project on city streets, such as Wootton Parkway and W. Gude Drive, up to the next state road in each direction; MD 355 to the east and MD 28 and MD 189 to the west.

### **Transit Considerations**

- Transit components are not adequate in the study: No standalone transit alternative has been proposed and the project does not include public mass transit. It is critical that MDOT reinstate transit as a key project element. Suggestions to improve Park & Ride lots and enhance current transit lines will not be acceptable, since the benefit of these transit improvements is expected to be negligible.

### **Cost and Equity Considerations**

- The potential toll rates per mile are high enough to deter many drivers from using the toll lanes.

### **Utility Impacts**

- Utility impacts have not been fully addressed.

### **Environmental Impacts**

- The City is concerned that the project does not address the expected impacts to Rockville's waterways and stormwater management (SWM). The latest project studies provide inadequate stormwater management treatment for current and future impervious surfaces. Additionally, staff believes that proposed roadway changes and the increase in runoff added to already undersized and deteriorated SHA pipes may overwhelm our storm drain system, increase our stream erosion, and cause more issues for the City to deal with in the future.
- Latest project studies targeted to show compliance with State and Federal regulatory requirements. However, Rockville's local SWM regulations have higher standards that require water quantity control or alternative mitigation for larger storms, which were not currently addressed.
- The City's Forest Conservation Act (FCA) and the City Forest and Tree Preservation ordinance were not considered during any stage of this project.
- The City requires the Forest Conservation Easements (FCE) impacts be mitigated by planting trees or acquiring forested parcels within boundaries of the city or, as a last resort, via fee-in-lieu money paid to the City, not the County. The report should reflect this requirement.

### **Noise Impacts**

- For the noise studies, the City requests additional review for the east side of I-270 on Redland Blvd., just south of Shady Grove Road, as well as the west side of I-270, just south of MD 189, at the Falls Ridge Neighborhood near Seven Locks Road. In addition, the City would like MDOT to reexamine noise levels near Wootton Parkway and consider adding noise barriers in this area.