



VILLAGE OF NORTH CHEVY CHASE

September 21, 2020

Testimony to Federal Highway Administration (FHWA), the Maryland Department of Transportation (MDOT), the State Highway Administration (SHA) and the Maryland Department of the Environment (MDE)

As part of public testimony in response to the I-495/I-270 Managed Lanes Study Draft Environmental Impact Statement (DEIS) and as residents and elected officials of the Village of North Chevy Chase, we would like to reiterate the Village's significant concerns about any expansion of I-495, including use of MD-185 (Connecticut Ave) for toll lane access. While our community abuts the portion of I-495 that has been slated for Phase II of any potential project, given that the DEIS addresses both phases of the project, we would like to speak to our ongoing concern about the potential environmental impacts arising from the proposed public-private partnership structure and potential environmental impacts for our community and the region as a whole of any I-495 expansion.

As you can imagine, our community and numerous others are highly skeptical of the proposed public-private partnership in which any proposed construction of I-495 and I-270 would take place. The recent contract negotiations with the Purple Line Transit Partners have highlighted the significant risks to taxpayers in such arrangements, including the possibility of significant environmental disruption for a project that may ultimately fail to be constructed. While State officials and planners have highlighted that there will be no cost to taxpayers for the beltway project, utility companies such as WSSC have calculated that it could cost up to \$2 billion to move pipes and infrastructure to accommodate the planned widening of I-270 and I-495, which could add thousands of dollars to residents' utility bills and which infrastructure relocations themselves could have serious environmental impacts unaddressed at all in the DEIS. Of particular concern is how any contract would be structured to ensure that the winning bid adheres to the State's environmental requirements and critically, property acquisitions and relocations. Once control of the project shifts from government authorities to private contractors, the ability to ensure that environmental concerns rather than the economic self-interest of those private contractors are fully taken into account is a paramount concern, yet this is in no way addressed in the DEIS document.

Our community is also gravely concerned about the total lack of transparency in the project to date. The study notes that the 6 alternatives beyond No Build all involve widening the pavement of I-495. The Village has residents whose property abuts the beltway as well as MD-185/Connecticut Avenue leading to the I-495 on ramp. Residents of the Village of North Chevy Chase received letters from State Highway Administration in November 2019 notifying them that SHA would be accessing their private property to "complete field research and survey activities" as part of the I-495 & I-270 P3 Program. Despite our efforts, including State Delegates' efforts, to receive information from SHA on which properties received the letters to better understand the breadth of the survey, SHA would not disclose the information, citing an act meant to protect citizens' personal data. Adding to the perception of opaque decision making is giving individuals and communities a relatively limited time period (originally 90 days and only recently extended to 120 days) to absorb and assess an 18,000-page technical document in the middle of a pandemic.

We are very concerned about proposals to utilize Connecticut Ave (MD-185) as an on ramp to proposed toll lanes. While SHA is currently undertaking improvements to the intersection of Connecticut Ave and Jones Bridge Rd as part of the overall BRAC project, there is significant congestion throughout the area during the day, with virtually no opportunities to expand the streets further given the dense population of the area. The community has already suffered from significant canopy loss due to Purple Line construction as well as large multi-family complexes such as Chevy Chase Lake, impacting the area's air quality and storm water management capacities.

We strongly encourage you to revisit the alternatives beyond the No Build in the Managed Lane Study to draw lessons from the COVID-19 pandemic and its effects on traffic patterns. The notable reduction in traffic along I-495 and I-270 during the pandemic highlights opportunities to more fully take account of the manner in which virtual work and staggered work hours at businesses and government offices throughout the area will affect future travel volumes and density. Rather than looking forward to an honest assessment of future transportation needs and how best to meet them, it appears as though the impetus for this project is focused on a rear-view mirror assessment of problems that are in no way related to the traffic situation and transportation needs likely to be present over the next 20 years. Avoidance of unnecessary and harmful environmental impacts for a project that is ill-suited to meet the actual transportation requirements of the next quarter century should be a paramount priority for all those involved. Governor Hogan and Governor Northam have cooperated on proposals for expansion of the American Legion Bridge – it would seem beneficial for them to combine efforts in looking more thoroughly at no build alternatives as well for the region as a whole.

Sincerely,

Council of the Village of North Chevy Chase

Adrian Andreassi, Chair

Brian Hoffner, Vice Chair

Maury Mechanick, Secretary

Chas Stuart, Treasurer

Ronald Jones, Member

cc: Maryland House of Delegates Representatives Carr, Shetty and Solomon

Maryland State Senator Waldstreicher

Montgomery County Executive Elrich

Montgomery County Council Representatives Friedson, Albornoz, Glass, Jawando and Riemer

U.S. Congress Representative Raskin

U.S. Senators Cardin and Van Hollen

Maryland Governor Hogan

Maryland Comptroller, Peter Franchot

Maryland Treasurer Kopp