

## **B. AGENCY COMMENTS ON DEIS**

# **1. FEDERAL**

**SUMMARY OF AGENCY COMMENTS ON DEIS (FEDERAL)**

<b>ENVIRONMENTAL REVIEW AND REGULATORY AGENCIES</b>		<b>RESPONSE LOCATION (Section &amp; Page #)</b>
US. Army Corps of Engineers Date: 10/3/01 (see page VI-140)	<ul style="list-style-type: none"> <li>• Provided the following comments: strongly encourage the selection of Option E @ Swan Creek because of minimization of impacts to Wetland S9.</li> </ul>	See page VI-140 See page VI-141
Federal Emergency Management Agency Date: 7/30/01 (see page VI-142)	<ul style="list-style-type: none"> <li>• Suggested coordination with the Floodplain Management Officers of the appropriate communities to assure that project meets ordinances in Highway Design.</li> </ul>	See page VI-142
National Capital Planning Commission Date: 6/13/01 (see page VI-143)	<ul style="list-style-type: none"> <li>• DEIS does not discuss Metro-rail station near National Harbor. Intermodal transportation effects of this station on improvements of MD 210.</li> </ul>	See page VI-143
United States Department of the Interior Date: 8/17/01 (see page VI-145)	<ul style="list-style-type: none"> <li>• No objection to Section 4(f) approval by DOT.</li> </ul>	See page VI-145
United States Environmental Protection Agency Date: 7/24/01 (see page VI-146)	<ul style="list-style-type: none"> <li>• Assigned a rating of Environmental Concerns to the DEIS, has also assigned a rating of 2 (additional information required) to the quality of the document due to questions pertaining to Environmental Justice.</li> <li>• Supports the concept of improving the existing facility through the addition of interchanges, overpasses and HOV lanes.</li> <li>• Strongly suggests all efforts be made to avoid or minimize impacts to the Natural Environment.</li> </ul>	See page VI-146



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
BALTIMORE DISTRICT, U.S. ARMY CORPS OF ENGINEERS  
P.O. BOX 171F  
BALTIMORE, MD 21203-171F

3 October 2001

Operations Division

Maryland State Highway Administration  
Attn: Ms. Heather Amick  
707 North Calvert Street  
Baltimore, MD 21202

Dear Ms. Amick:

The purpose of this letter is to summarize the Corps' concerns on the alternatives identified in the Draft Environmental Impact Statement for the MD Route 210 Multi-Modal Study, in Prince Georges County, Maryland.

Our primary concern is with the interchange at Swan Creek Road. We note that Interchange Option E has the potential to reduce the impacts to wetlands 9 and 9A by more than 2 acres. The 404(b)(1) Guidelines require an analysis of practicable alternatives, and the selection of the practicable alternative which is least damaging to aquatic resources. We could not find cost information for either Option D or Option E in the DEIS. We understand that Option E is the preferred option of the Fort Washington Hospital because it would provide the most direct connection to the Hospital for motorists from the south, via Livingston Road (see DEIS, p. VI-47). Option E also provides a direct link between the Hospital and the Lexington Health Care Center, which provides related medical services. In addition, the avoidance of wetland 9 with Option E would allow the existing trees in wetland 9 to continue to serve as a visual buffer behind the homes on Gable Lane and Merck Place.

We strongly encourage the selection of Option E, even if it is more expensive than Options C or D, because of its many advantages. Please coordinate with us further before making a final selection of interchange option at Swan Creek Road.

Sincerely,

Paul R. Wettlaufer  
Transportation Program Manager

THE WILSON T. BALLARD COMPANY

TELEPHONE MEMORANDUM

PROJECT:	MD 210 Multi-Modal Study	DATE:	10/3/01
FILE NO.:	100-221	TIME:	
CALL TO:	Paul Wettlaufer - Corps of Engineers		
CALL FROM:	Mark Lotz		
TELEPHONE NO.:	410-962-5676		

SUBJECT: Letter from Corps, dated 10/3/01, regarding Swan Creek Road Option E

I called Paul at the request of Anne Elrays to respond to the letter. I told Paul that the cost of Option E is shown on Table IV-14 and is \$18.4 million, as compared to the costs of Options C and D, which are each \$13.6 million.

I told Paul that SHA Bridge Design and Highway Design are reviewing Option E in further detail. There may be some concern over the bridge span skew and length and the amount of retaining wall. Void of any serious concerns along those lines, Option E may become the Team's preferred option at this location given that it reduces total project wetland impacts by half, or 2 acres. We agree that it also has traffic operations advantages over the other options, primarily related to hospital access.

Paul thought there might be opportunities to reduce the costs of this option. In some cases, the acquisition of businesses (e.g., gas station, bank, or Wendy's on west side; former restaurant/proposed CVS pharmacy on east side) may be cheaper than the large retaining walls proposed. Paul recommended investigating the feasibility and merits of advance acquisition of the proposed CVS site to reduce/eliminate retaining walls on the east side, provide better service road geometry and possibly reduce bridge skew.

The Team will report back to Paul regarding the comments from Highway Design and Bridge Design on Option E.

By Mark D. Lotz

cc: Mr. Dennis Atkins  
Ms. Heather Amick  
Ms. Anne Elrays  
File

VI-140

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THE WILSON T. BALLARD COMPANY  
17 GWYNNS MILL COURT  
OWINGS MILLS, MARYLAND 21117

OFFICE MEMORANDUM

**DATE TYPED:** December 11, 2003  
**PROJECT:** MD 210 Multi-Modal Study  
**FILE:** 100-226.10  
**SUBJECT:** Follow-up Discussion in Response to the U.S. Army Corps of Engineers  
Letter dated October 3, 2001

Subsequent to the October 3, 2001 discussion with Mr. Wettlaufer, review comments from the SHA Bridge Design and Highway Design divisions, as well as subsequent coordination with the Focus Group and representatives of the Safeway shopping center, led to several design iterations for the MD 210/Swan Creek Road interchange. Interchange Option G resulted from these design iterations. Option G maintains the original intent of the Corps-suggested Option E, which is to minimize impacts to Wetlands S9 and S9A, but addresses concerns expressed by others related to shopping center visibility and accessibility. Alternative 5A Modified, including Option G at the MD 210/Swan Creek Road intersection, is the SHA-Selected Alternative.

By: Joe DeMent

Cc: Ms. Chisa Winstead  
Ms. Heather Amick  
File



MT

# Federal Emergency Management Agency

Region III  
One Independence Mall, Sixth Floor  
615 Chestnut Street  
Philadelphia, PA 19106-4404

8/21/01  
D  
J  
P

July 30, 2001

Ms. Cynthia Simpson, Deputy Director  
Office of Planning and Preliminary Engineering  
Mailstop C-301  
State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

RE: U.S. Route 1, College Park, and MD 210 Multi-Modal Study

Dear Ms. Simpson:

The Federal Emergency Management Agency (FEMA) received your Environmental Assessment for U.S. Route 1 in College Park and your Draft Environmental Impact Statement for the MD 210 Multi-Modal Study. These reports described proposed projects in areas that have been mapped by FEMA as Zone AE, areas subject to flooding during the 1% annual chance (100-year) event with base flood elevations determined.

The National Flood Insurance Program (NFIP) is administered by FEMA and is designed to reduce flood losses through local floodplain management and provide flood insurance to property owners. The NFIP requires participating communities to adopt and enforce floodplain management ordinances with stipulations about modifications of the 100-year floodplain. As such, each floodprone community has an ordinance requiring permits for all proposed construction within Zone AE areas and also requiring that the flood carrying capacity of a relocated stream be maintained.

To prove that the flood carrying capacity of impacted watercourses will be maintained may require an engineering study and completion of the enclosed Conditional Letter of Map Revision Application. Please coordinate with the Floodplain Management Officers of the appropriate communities to assure that the project meets the requirements of their floodplain management ordinance.

If you have any questions or problems, please call me at 215-931-5524.

Sincerely,

Jon Janowicz, P.E.  
Civil Engineer  
Mitigation Division

Enclosure

cc: State Coordinator  
FEMA Region 3 Community File  
Chron File



# Maryland Department of Transportation State Highway Administration

September 27, 2001

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

Mr. Jon Janowicz  
Mitigation Division  
Federal Emergency Management Agency  
Region III  
One Independence Mall, Sixth Floor  
615 Chestnut Street  
Philadelphia, PA 19106-4404

Dear Mr. Janowicz:

Thank you for your comments on the Environmental Assessment (EA) for US 1 in College Park and the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study. We would like to respond to the concerns outlined in your letter.

You requested that the Maryland State Highway Administration (SHA) coordinate with the Floodplain Management Officer of the appropriate community to assure that the projects meet the requirement of their floodplain management ordinance. The US 1 College Park project and the MD 210 Multi-Modal Study are both in the Project Planning phase, and a Selected Alternative has not yet been identified for either project. Once an alternative is selected and the projects move into the final design phase, SHA will complete detailed hydrology and hydraulics studies to determine if the water surface elevation would be changed by the proposed projects. If required, SHA will complete the Conditional Letter of Map Revision Application and coordinate with the affected communities.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI-142

VI-143

IN REPLY REFER TO:  
NCPC File No. 1200

JUN 13 2001

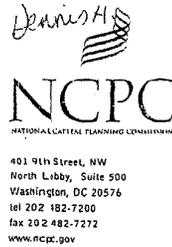
Ms. Cynthia D. Simpson  
Deputy Director  
Office of Planning and Preliminary Engineering  
Mail stop C-301  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Dear Ms. Simpson:

Thank you for the opportunity to review the Federal Highway Administration (FHWA) and Maryland State Highway Administration (SHA) Draft Environmental Impact Statement (DEIS) for the Maryland Route 210 (MD 210) Multi-Modal Study evaluating measures to improve safety and relieve congestion on a 10-mile segment of this roadway in southwestern Prince George's County, Maryland. This examination is limited to the Commission's role as the central planning agency for the federal government in the National Capital Region and expresses our general views on planning and environmental issues. This review does not constitute an approval of the proposed action.

After fully evaluating the analysis and conclusions of the DEIS, the Commission staff agrees that the proposed mitigation measures described in the DEIS, if implemented by SHA, would address most short- and long-term environmental effects for the proposed alternative roadway configurations. However, the Commission staff takes this opportunity to express concern on the issue of associated transportation and traffic congestion identified in the DEIS that is projected to emanate from the MD 210 travel corridor.

Recent transportation planning initiatives in the MD 210 area have identified potential Metro-rail stations near the capital beltway. The proposed alternatives in the DEIS, nonetheless, specify no acknowledgement of the now planned Metro-rail station in the vicinity of National Harbor by the Washington Metropolitan Area Transit Authority (WMATA), near the northern section of the MD 210 mainline at Oxon Hill. The Commission staff recommends that SHA provide further discussion and consideration of the intermodal transportation effects of the potential location of this WMATA station in relation to planned improvements of MD 210. Particularly, an evaluation of the WMATA station access to and from MD 210 should be presented. In this respect, station access is particularly important because the station would be the closest transit connection to the MD 210 mainline. And although the Commission recognizes the station construction may be some years away, provisions for possible access points in conjunction with MD 210 should be considered. Early planning information for the proposed National Harbor Station can be obtained from WMATA.



Maryland Department of Transportation  
State Highway Administration

September 21, 2001

Ms. Patricia E. Gallagher, AICP  
Executive Director  
National Capital Planning Commission  
401 9<sup>th</sup> Street, NW  
North Lobby, Suite 500  
Washington, D.C. 20576

Dear Ms. Gallagher:

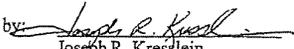
Thank you for your letter dated June 13, providing comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the MD 210 Multi-Modal Study. You have requested that the final document include consideration of the planned Washington Metropolitan Area Transit Authority (WMATA) metro-rail station in the vicinity of National Harbor, near the northern section of the MD 210 mainline at Oxon Hill.

The MD 210 Multi-Modal study team includes representatives from WMATA. Coordination to incorporate the latest WMATA plans in the area, including metro-rail and bus service, are on-going. As the Preferred Alternative selection process continues for the MD 210 study, consideration will be given to providing consistency with the Woodrow Wilson Bridge Project, the National Harbor Project, future metro-rail plans, and evaluation of possible future WMATA station access. A discussion of the planned National Harbor vicinity Metro-rail station will be included in the final document.

Thank you again for your comments. We will provide a copy of the Final EIS and the subsequent Record of Decision to you upon their completion. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

by:   
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

NATIONAL CAPITAL PLANNING COMMISSION

My telephone number is \_\_\_\_\_

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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

Ms. Cynthia D. Simpson  
Page Two

We appreciate your consideration of our comments. The Commission looks forward to better identification of the specified issue in the Final EIS, and adoption of mitigation measures listed in the DEIS to implement the project. Please provide a copy of the Final EIS and subsequent Record of Decision to the Commission when available.

Sincerely,

  
Patricia E. Gallagher, AICP  
Executive Director

Ms. Patricia E. Gallagher  
Page Two

cc: Ms. Heather Amick, State Highway Administration  
~~Mr. Dennis M. Atkins~~, State Highway Administration  
Mr. Bruce Grey, State Highway Administration  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration



United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240

RECEIVED  
AUG 26 2003  
THE WILSON T. BALLARD CO.  
BY \_\_\_\_\_



Maryland Department of Transportation  
State Highway Administration

October 16, 2001

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

ER 01/385

AUG 17 2001

Ms. Cynthia D. Simpson  
Deputy Director  
Office of Planning and Preliminary Engineering  
Mailstop C-301  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Dear Ms. Simpson:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental Impact Statement and Section 4(f) Evaluation for **MD-210 (Indian Head Highway)** Multi-Modal Study, between I-95/I-495 (Capital Beltway) and MD-228, Prince George's County, Maryland.

We concur that there is no prudent and feasible alternative to the proposed project, if project objectives are to be met. We also concur with the proposed measures to minimize harm to Section 4(f) resources which may be affected by the proposed project.

The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation.

We appreciate the opportunity to provide these comments.

Sincerely,

Willie R. Taylor  
Director, Office of Environmental Policy  
and Compliance

Mr. Willie R. Taylor  
Director, Office of Environmental  
Policy and Compliance  
United States Department of the Interior  
Office of the Secretary  
Washington, D.C. 20240

Dear Mr. Taylor:

Thank you for your comments regarding the MD 210 Multi-Modal Study Draft Environmental Impact Statement (DEIS).

The Maryland State Highway (SHA) appreciates your concurrence that there is no prudent and feasible alternative to the proposed project. We also acknowledge that the Department of Interior has no objection to Section 4(f) approval of the project by the Department of Transportation.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

by:   
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

cc: Ms. Heather Amick, State Highway Administration  
Mr. Dennis M. Atkins, State Highway Administration  
Mr. Bruce Grey, State Highway Administration  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
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Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI-145



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION III  
 1650 Arch Street  
 Philadelphia, Pennsylvania 19103-2029

2001 JUL 24



U.S. Department  
 of Transportation  
 Federal Highway  
 Administration

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 AUG 28 2001

THE WILSON T. BALLARD CO.  
 BY \_\_\_\_\_  
 Maryland Division  
 The Rotunda  
 711 West 40<sup>th</sup> Street, Suite 220  
 Baltimore, Maryland 21211

September 19, 2001

Mr. Nelson Castellanos  
 Division Administrator  
 Federal Highway Administration  
 The Rotunda - Suite 220  
 711 West 40<sup>th</sup> Street  
 Baltimore, Maryland 21211

Re: MD 210 Multi-Modal Study  
 I-95/I-495 to MD 228  
 Prince George's County, MD

Dear Mr. Castellanos:

In accordance with the National Environmental Policy Act, Section 309 of the Clean Air Act, and Section 404 of the Clean Water Act, EPA has reviewed the Draft Environmental Impact Statement for the MD 210 Multi-Modal Study. Based on the potential impacts to streams, Chesapeake Bay Critical areas, historic resources, and residential, business/commercial, and church/school properties, we have assigned a rating of Environmental Concerns ("EC") to the DEIS. EPA has also assigned a rating of "2" (additional information required) to the quality of the document due to a number of questions pertaining to the Environmental Justice evaluation.

In general, EPA supports the concept of improving the functioning of an existing transportation facility through the addition of grade-separated interchanges, overpasses, and High Occupancy Vehicle (HOV) lanes. We suggest that the Federal Highway Administration and the Maryland State Highway Administration continue to work with the local citizens to develop an acceptable solution to the area's transportation needs.

EPA strongly suggests that all efforts to avoid and minimize impacts to Chesapeake Bay Critical Areas, streams, wetlands, and floodplains should be included in the design of the proposed facility. If the impacts are unavoidable, mitigation measures should be developed to offset these impacts.

Regarding the evaluation of the project's potential for a disproportionate impact to low income and minority communities under the Executive Order for Environmental Justice, and Title VI of the Civil Rights Act, EPA has the following questions.

- Is the definition of minorities as cited by the document on page III-3 limited to members of those groups only? Is this definition completely accurate and inclusive?

Project No. AW534B11  
 MD 210 Multi-Modal Study  
 I-95/I-495 to MD 228  
 Draft EIS  
 Prince George's County, Maryland

Mr. Richard Pepino  
 Environmental Protection Agency  
 Region III  
 1650 Arch Street  
 Philadelphia, PA 19103-2029

Dear Mr. Pepino:

Thank you for your letter on the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study. The Federal Highway Administration (FHWA) and the Maryland State Highway Administration (SHA) appreciate the US Environmental Protection Agency's (EPA) comments and ratings on the alternates being considered. We would like to address some of the concerns outlined in your letter.

The FHWA and the SHA will continue to work with the local citizens to develop an acceptable solution to the area's transportation needs. In addition, the FHWA and SHA will make all efforts to avoid and minimize impacts to the Chesapeake Bay Critical Areas, streams, wetlands, and floodplains in the design of the proposed facility. If these impacts are determined to be unavoidable, we will develop appropriate mitigation measures.

Concerns were raised in relation to the project's potential for a disproportionate impact to low income and minority communities under the Executive Order for Environmental Justice and Title VI of the Civil Rights Act. We offer the following responses to your questions:

VI-146

- Is environmental justice limited to addressing concerns related to public participation and disproportionately high impacts resulting from alternatives under consideration? What about outreach and education of the public regarding the project under study? Should the public be a meaningfully involved participant in decision making?
- What is the relevance of citing the fact that certain census tracts have minority population percentages exceeding 50%? Is this a benchmark value that is being used? If so, please document and justify its use.
- How do the percentages of minorities and low-income populations in the area compare to those found in the state as a whole? Comparisons should be made at the state level as well in order to provide additional perspective.
- In the future, it may be helpful to hold a group meeting with the church leaders to explain the project and to solicit their assistance directly in helping you spread the word to their congregations. Direct contact with the ministers may increase the community participation in the project.
- In the context of this project, how does the Federal Highway Administration, Maryland Division, and the Maryland State Highway Administration, ensure compliance with Title VI of the Civil Rights Act of 1964? Please provide details.
- In Section IV-4 there is a paragraph which begins, "This information may not be indicative of the local racial population group composition where displacements are projected to occur." Please explain.

Thank you for providing EPA with the opportunity to comment on this project. We look forward to working with you to resolve our concerns with the Environmental Justice evaluation. If you have any questions regarding our comments, please feel free to contact Ms. Denise Rigney at (215) 814-2726.

Sincerely,

  
for Richard V. Pepino, Director  
Office of Environmental Programs

- The definition of "minority" on page III-3 of the DEIS is contained in FHWA's Technical Advisory (TA) 6640.23, "FHWA Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." The TA states the following:

*These definitions are intended to be consistent with the draft definitions for EO 12898 that have been issued by the Council on Environmental Quality (CEQ) and the Environmental Protection Agency (EPA). To the extent that these definitions vary from the CEQ and EPA draft definitions, they reflect further refinements deemed necessary to tailor the definitions to fit within the context of the FHWA program.*

- Outreach to and education of the public along with the provision of opportunities for the public to provide input as part of the project decision-making are important parts of the Environmental Justice process. As stated throughout the DEIS, the MD 210 Multi-Modal Study has complied with these goals through the following:
  1. Formation of a Citizens' Focus Group, with diverse representation from all communities in the study area, with over 20 meetings in three years;
  2. Outreach (via letter) to the area National Association for the Advancement of Colored People (NAACP) chapter, soliciting comments on the project;
  3. Outreach (via letter) to over 100 area churches, many of which have predominantly minority congregations, providing project information and an open invitation to meet with SHA staff. As stated in the DEIS, a meeting giving an overview of the MD 210 project was held at the Whitehall Baptist Church on November 16, 2000;
  4. Several meetings with area business owners concerning access and economic viability issues;
  5. A meeting with potentially relocated residents to discuss the project and relocation procedures;
  6. Three public meetings, including two informational workshops and a formal public hearing, each of which was well attended; and
  7. Other various small group meetings, as cited in the DEIS, to present project information and solicit input.
- The statement that certain census tracts have a minority population exceeding 50% has no relation to benchmark values or policy. It is a qualitative means of summarizing the racial characteristics of the study area to provide reviewers and decision-makers helpful information in understanding the social environment. A value exceeding 50% was selected arbitrarily based on the fact that it represents those census tracts with minorities representing a majority of the population in that given area.
- According to 1990 census information, minority populations comprised 30.4% of the population in Maryland. This information will be added to the final environmental document. 2000 census data was not used because it was not available.

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- As stated in the DEIS, letters were sent directly to over 100 churches in the study area containing an open invitation to meet with SHA representatives. At their request, a meeting giving an overview of the MD 210 project was held at the Whitehall Baptist Church on November 16, 2000.
- The FHWA and SHA are committed to the principles of environmental justice (EJ) as addressed in Title VI of the Civil Rights Act of 1964, and reinforced in Executive Order #12898. Other documents which have been issued to further clarify the Executive Order are the US Department of Transportation's (DOT) Order on Environmental Justice, dated April, 1997; the Council on Environmental Quality's (CEQ) "Environmental Justice Guidance Under the National Environmental Policy Act", dated December, 1997; and the Federal Highway Administration's (FHWA) Order on Environmental Justice, dated December, 1998. The goal of the FHWA and SHA is to identify minority and low-income populations, bring them into the project development process, and ensure that reasonable efforts are made to address their concerns and provide them opportunities to provide meaningful input into transportation decision-making.

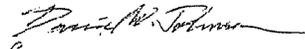
Minority and low-income populations were identified through community mailings, meetings, and the formation of a Citizens' Focus Group, with diverse representation from all communities in the study area, as well as through census data collection. In addition, community input on alternatives was solicited at every step of the process through the above-referenced meetings and correspondence. The project team held two informational workshops and one public hearing where the public was provided with details related to the MD 210 Multi-Modal Study and community input was solicited. These public involvement processes help to eliminate participation barriers and engage minority and low-income populations in transportation decision making.

- Further clarification was requested regarding the statement in Section IV-4, "This information may not be indicative of the local racial population group composition where displacements are projected to occur." The information being referred to is the previous paragraph's summarization of county and study area racial populations as percentages of the total (county and study area) populations. The study area is known to be 62% minority based on a synthesis of data from individual study area census tracts for which racial composition is publicly available information. It appears that the residential and/or business displacements are extremely small in comparison to the size of the census tracts, and there may be no correlation between the racial composition of the census tracts and the racial composition of impacted residents. Determining the racial composition of potentially relocated residents can be a difficult task to accomplish in a legal and respectable fashion. However, based on those attending a meeting held to discuss the project with potentially relocated landowners, it appears that a relatively small percentage of potential relocations are minority.

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Thank you again for your comments. If you have any comments or questions, please feel free to call Ms. Mary Huie of my staff at 703-519-9800.

Sincerely yours,

  
Nelson J. Castellanos  
Division Administrator

cc:

- Heather Amick, SHA
- Dennis Atkins, SHA
- Joseph Kresslein, SHA
- Cynthia D. Simpson, SHA
- Caryn J. G. Brookman
- Dan W. Johnson
- Greg Wolf
- Mary Huie

Cbrookman:jeh 9/19/01 s:\cbrookman\210epa.doc

## **2. STATE**

**SUMMARY OF AGENCY COMMENTS ON DEIS (STATE)**

<b>ENVIRONMENTAL REVIEW AND REGULATORY AGENCIES</b>		<b>RESPONSE LOCATION (Section &amp; Page #)</b>
<p>Chesapeake Bay Critical Area Commission Date: 7/12/01 (see page VI-151)</p>	<ul style="list-style-type: none"> <li>• Alternatives 5B and 5C impact the CBCA. Additionally, a 100-foot buffer to a tributary stream may be impacted. SHA should coordinate with the CBCA Commission through final design regarding proposed impacts.</li> </ul>	<p>See page VI-151</p>
<p>Maryland Department of Natural Resources Date: 7/20/01 (see page VI-153)</p>	<ul style="list-style-type: none"> <li>• Requested proposed stream impacts be defined in more detail, develop a conceptual mitigation informational package.</li> </ul>	<p>See page VI-153</p>
<p>Maryland Department of Planning Date: 7/18/01 (see page VI-157) 8/3/01 (see page VI-159)</p>	<ul style="list-style-type: none"> <li>• Continue coordination between MDP and SHA/MDOT with regard to PFA law compliance as project progresses. Requests a more detailed analysis of transit enhancements and provision of park and ride facilities. Requests more specific information on pedestrian and bicycle facility improvements. Include an analysis in Section II how proposed HOV lanes would improve MD 210. Analysis conclusions should be revised or clarified within the SCEA analysis. Discussions of secondary effects on PFA's and on non-PFA's should be integrated in the SCEA analysis.</li> <li>• The Maryland Departments of Housing and Community Development including the Maryland Historical Trust, Natural Resources, and Charles County found this project to be consistent with their plans, programs and objectives.</li> <li>• The Maryland Department of the Environment and Prince George's County found this project to be generally consistent with their plans, programs and objectives.</li> </ul>	<p>See page VI-158a VI-158b VI-158c VI-314 VI-315 VI-316</p>

Judge John C. North, II  
Chairman



STATE OF MARYLAND  
CHESAPEAKE BAY CRITICAL AREA COMMISSION  
1804 West Street, Suite 100, Annapolis, Maryland 21401  
(410) 260-3460 Fax: (410) 974-5338

*Dennis*  
*Joe K.*  
Ren Serey  
Executive Director



Maryland Department of Transportation  
State Highway Administration

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

October 18, 2001

Ms. Lisa A. Hoerger  
Chesapeake Bay Critical Area Commission  
1804 West Street, Suite 100  
Annapolis, MD 21401

Dear Ms. Hoerger:

Thank you for your comments regarding the MD 210 Multi-Modal Study Draft Environmental Impact Statement (DEIS). The Maryland State Highway Administration (SHA) has reviewed your letter and would like to take this opportunity to address your questions and comments.

As stated in your letter, Alternatives 5B and 5C each propose 7.3 acres of impact within the Chesapeake Bay Critical Area. In addition, the 100-foot buffer to a tributary stream may be impacted by either alternative. The potential stream buffer impact is within a Habitat Protection Area (HPA), and the selection of either Alternative 5B or 5C would require Chesapeake Bay Critical Area Commission approval. Additionally, impacts to Forest Interior Dwelling Bird (FID) habitat would require Commission approval.

The SHA will continue to coordinate with the Commission through final design regarding proposed impacts within the Critical Area, appropriate mitigation ratios, and proposed sediment and erosion control measures and stormwater management techniques. All appropriate state, local and federal permits will be obtained prior to Commission approval, and every effort will be made to locate stormwater management facilities outside of any designated HPAs.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

Branch Office: 31 Creamery Lane, Easton, MD 21601  
(410) 822-9047 Fax: (410) 320-5093

TTY FOR DEAF ANNAPOIS: 974-2600 T.C. MPTRO: 586-0450

VI-151

July 12, 2001

Ms. Cynthia D. Simpson  
Deputy Director  
Office of Planning and Preliminary Engineering  
Mailstop C-301  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Re: Project N. PG 221A11  
MD 210 Multi-Modal Study, I-95/I-495 to MD 228  
Prince George's County, Maryland

Dear Ms. Simpson:

Thank you for forwarding the above-referenced project to this office for review and comment. I have reviewed the proposed alternatives for the MD 210 project. According to the information provided, it appears that the options associated with alternatives 5B and 5C will have a total of 7.3 acres of impact to the Chesapeake Bay Critical Area.

It also appears that the 100-foot Buffer to a tributary stream will be impacted. Since the Buffer is considered a Habitat Protection Area (HPA) under the Critical Area Criteria, the selection of alternative 5B and 5C will require approval by the Chesapeake Bay Critical Area Commission. The report also references potential disturbance to Forest Interior Dwelling Bird (FID) habitat. This disturbance would also require Commission approval.

Regardless of the selected alternative, the State Highway Administration is required to forward all projects in the Critical Area to this office for staff review and comment. This project will likely require some form of forest, FID, and/or Buffer mitigation depending on the selected alternative. The mitigation ratios are dependent on the amount and type of disturbance. We will be happy to provide more detailed information once the alternative is selected.

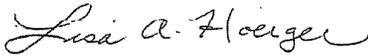
Ms. Simpson  
Page Two  
July 12, 2001

In general, any disturbance to FID habitat requires a minimum 1:1 mitigation ratio and that mitigation must be creating new FID habitat. Therefore, the proposed planting area must be adjacent to an existing FID forest. Buffer disturbance generally requires a 3:1 mitigation ratio and that mitigation must occur in back in the 100-foot Buffer. The order of preference is in the Buffer on-site or at a nearby off-site location.

We will also be interested in the proposed sediment and erosion control measures and the proposed stormwater management technique used for the project. If the project will require Commission approval, all necessary State, local and federal permits that are required should be obtained prior to Commission approval. All stormwater management facilities shall be located outside of any designated HPAs.

If I can provide you with further assistance, please do not hesitate to contact me at (410) 260-3478.

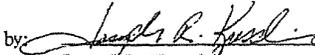
Sincerely,



Lisa A. Hoerger  
Natural Resources Planner

cc: Ms. Regina Esslinger, Chief, Project Evaluation

Ms. Lisa A. Hoerger  
October 16, 2001  
Page Two

by:   
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

cc: Ms. Heather Amick, State Highway Administration  
Mr. Dennis M. Atkins, State Highway Administration  
Mr. Bruce Grey, State Highway Administration  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration



Parris N. Glendening  
Governor  
Kathleen Kennedy Townsend  
Lt. Governor

Maryland Department of Natural Resources  
ENVIRONMENTAL REVIEW

Tawes State Office Building  
Annapolis, Maryland 21401

July 20, 2001

Sarah J. Taylor-Rogers, Ph.D.  
Secretary

Stanley K. Arthur  
Deputy Secretary

Ms. Cynthia D. Simpson  
Deputy Director  
Office of Planning and Preliminary Engineering  
Mailstop C-301  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

Dear Ms. Simpson:

The Maryland Department of Natural Resources (DNR) has conducted a review of the Draft Environmental Impact Statement/Section 4(f) Evaluation (DEIS) for the MD 210 Multi-Modal Study project (Project No. PG221A11, MD 210 from I-95/I-495 to MD 228, Prince George's County). We have the following comments on the draft document:

1. Page III-46 (3. Fish Fauna) - A statement is made in this paragraph that, "The only anadromous fish with documented spawning in the project area is the white perch..." It appears that this statement may have been used to refer only to the results of certain specific surveys that were evaluated during the writing of this section, although this is not entirely clear. As indicated in the DNR letter describing fisheries resources in the Study Area (dated July 11, 2000, from Ray Dintaman to Joseph Kresslein), anadromous herring species (*Alosa sp.*) have also been documented spawning within the Study Area. The spawning by herring was documented during previous anadromous fish surveys by DNR biologists. We request that the presence of spawning herring be added to the text in this section. While it is acceptable to rely heavily on the specific surveys referenced to describe the fish species present in the area (provided that the surveys were thorough studies with the intent of characterizing the entire fish population of the sampled sites), other fisheries documentation (such as the presence of spawning herring) that is available should not be excluded. This section of text also references the fish list that is included in the Appendix. That list, found on page IX-1, and also the terrestrial fauna list which follows it, should include more specific title information describing the source of the information and the dates or year range of data collection. The fish list includes yellow perch, which is considered an anadromous fish (or semi-anadromous fish) in this region. While its presence on the fish list does not necessarily indicate spawning within the Study Area, it may be appropriate to also reference this species in the statement on anadromous fish species.

Telephone: (410) 260-8330  
DNR TTY for the Deaf: (410) 260-8835



Maryland Department of Transportation  
State Highway Administration

September 28, 2001

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

Mr. Ray C. Dintaman, Jr., Director  
Maryland Department of Natural Resources  
Environmental Review Unit  
Tawes State Office Building, B-3  
580 Taylor Avenue  
Annapolis, Maryland 21401

Dear Mr. Dintaman:

Thank you for your July 20 letter providing comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the MD 210 Multi-Modal Study. The purpose of this letter is to address some of the concerns outlined in your letter. The following numbered responses correspond to the numbered comments in your letter:

1. The presence of spawning herring will be added to the text of the final environmental document in the section corresponding to DEIS p. III-46 (3. Fish Fauna). More specific title information describing the source of the information included in the Appendix will also be added. We will perform additional research to determine if it would be correct to add yellow perch to the listing of anadromous fish species.
2. The final environmental document will include a statement in the stream impacts section regarding sediment spills as a potential construction impact.
3. Subsequent to publication of the DEIS, SHA undertook a more detailed analysis of the potential MD 210 stream impacts to provide further definition. Stream impacts were inventoried for each alternative according to whether they were relocation or pipe impacts, and whether the stream segment impacted was perennial or ephemeral. All of these results will be included in the final environmental document.
4. We concur with the suggested text revisions, and will incorporate them into the final environmental document.
5. We appreciate this comment and will continue to include, as appropriate, information similar to that contained in the fauna impacts section in future environmental documents.
6. Your concerns regarding the wording in reference to cumulative impacts to wetlands are noted, and your suggestions will be considered in developing this section in the final environmental document.

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

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100 North Street • Baltimore, Maryland 21202

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1a D. Simpson  
20, 2001

Page 2

2. At the top of page IV-43, potential impacts from construction are referenced. Accidental spills are referenced, but supporting information indicates that this is a reference mostly to equipment and machinery fluids. This section should prominently reference sediment spills or discharge from the construction areas, as sedimentation of downslope and downstream areas is one of the most critical potential impacts from construction activities. While sedimentation is referenced in subsequent pages, it should not be omitted from this introductory section.
3. On pages IV-43 and IV-44, stream impacts are discussed. The information explains that much of the stream impact total length is due to culvert extensions and grading for proposed fill slopes (grading and relocation of existing ditches and ditch streams). It further explains that actual stream relocations may only total approximately 235 linear feet. This explanation is very useful, as figures for total stream impacts can sometimes be misleading because they group into one statistic some of the least significant (roadside ditch relocation) and most significant (natural stream piping or relocation) types of natural resource impacts. We recommend that as the project study continues, the proposed stream impacts be further defined as feasible. One possible suggestion would be to present total stream impacts, and then also provide sub-categories to describe and enumerate the linear measurements of the different types of stream impacts that are included. This will provide a much more accurate description of the stream impacts to be expected.
4. On page IV-74, we recommend that an additional sentence or phrase be added to the third paragraph, after the existing sentence, "Impacts from the Build Alternates on F.I.D.s is expected to be minimal because most impacts are within the existing edge habitat." The additional language should convey the following point: "however, forest clearing and construction along the existing roadway associated with the Build Alternates may, in some areas, cause the further extension of edge habitat into nearby existing forest interior areas." To improve the accuracy of the text, the word "minimal" in the existing sentence referenced above should be changed to "limited" or "minimized".
5. We found many detailed references on potential impacts to various wildlife resources in the section on Environmental Consequences; Fauna (pages IV-73 to IV-81). The overall scope of the concepts presented in this section are impressive, and we commend the efforts made by the preparers of the document to put this section together. We hope to see similar information on the varied potential impacts from road construction to fauna in future environmental documents.
6. We recommend against use of the following statement, which can be found on page IV-159 in a discussion of cumulative impacts to wetlands: "However, given the current Federal and State regulatory framework contained in Section 404 of the Clean Water Act, the Maryland Nontidal Wetlands Protection Act and the 'no net loss' wetlands policies, impacts to wetlands under the future land use scenario are expected to be minimal". A similar statement can be found near the top of Page IV-166 in the first paragraph. The reason for our concern with this statement, and especially the use of the term "minimal", is that wetland impacts are not prohibited by State or Federal wetland protection laws; the laws only require avoidance and minimization efforts in relation to the purpose and need of various projects, along with consideration of alternative analyses for the projects. The term "minimal" conveys the idea that not only will these impacts be

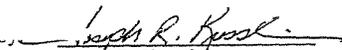
Mr. Ray C. Dintaman, Jr.  
Page Two

7. Conceptual mitigation of stream impacts will be addressed following the identification of a Preferred Alternative. A Conceptual Mitigation informational package will be developed for agency review at that time. We appreciate your detailed input regarding mitigation concepts at this early stage, as they will be evaluated for incorporation into the development of our informational package.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

  
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

cc: Ms. Heather Amick, State Highway Administration  
Mr. Dennis M. Atkins, State Highway Administration  
Ms. Caryn Brookman, Federal Highway Administration  
Mr. Michael Clifford, Washington Metropolitan Council of Governments  
Ms. Elizabeth Cole, Maryland Historical Trust  
Mr. Prakash Dave, State Highway Administration  
Mr. John Dinne, U.S. Army Corp of Engineers  
Mr. Elcer Ghigiarelli, Maryland Department of the Environment  
Mr. Greg Golden, Maryland Department of Natural Resources  
Mr. Bruce Grey, State Highway Administration  
Ms. Susan Hinton, National Park Service  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration  
Mr. J. Rodney Little, Maryland Historical Trust  
Mr. Mark Lotz, Wilson T. Ballard Company  
Mr. John Nichols, National Marine Fisheries Service  
Ms. Melinda Peters, State Highway Administration  
Ms. Barbara Rudnick, Environmental Protection Agency  
Ms. Bihui Xu, Maryland Department of Planning  
Mr. Robert Zepp, Fish and Wildlife Service

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minimized, but also that the final tally will not be of significance. In some cases of development, rather significant wetland impacts may be authorized for individual projects, and certainly the cumulative impacts that can be authorized over time in a developing area are likely to be considered more than "minimal". Also, we note that "no net loss" policies address the need for compensatory mitigation as much as they do impact avoidance and minimization, so "no net loss" does not directly provide assurances against future significant wetland impacts. Examples of more accurate language that still makes a similar point can be found nearby in the document in discussions of other resources. For example, on page IV-160 in the last paragraph, the following statement is made: "However, impacts to woodlands would be regulated under the Maryland Forest Conservation Act and the Chesapeake Bay Critical Area Protection Law, and effects would be offset through reforestation requirements." Also, on page IV-165 in the last paragraph, the following statement is made: "...the current regulatory framework for stormwater management and sediment and erosion control requirements would help to minimize the impacts to surface waters from development under the future land use scenario." More cautious and less conclusive language similar to these two examples (i.e. use of the term "minimized" rather than "minimal") should be used for the statements regarding wetlands impacts in the Secondary and Cumulative Effects Analysis section of the document.

7. We have the following recommendation related to the project, but not directly related to the DEIS contents: linear stream impact figures will likely be quite high for this project, although as discussed above, much of this impact could be affecting lesser quality roadside ditches. In any case, it will be important to develop a comprehensive package of compensatory mitigation that successfully addresses any significant non-vegetated wetland stream impacts, separate and in addition to the mitigation for vegetated wetlands. Very high quality fisheries resources, including additional anadromous fish spawning areas and a significant recreational largemouth bass fishery, are found in the Potomac River mainstem just outside and downstream of the Study Area for this project. Mitigation for stream impacts, if necessary, should include consideration of each of the following important categories as the mitigation package is developed: stormwater retrofits throughout the area to improve downstream water quality and habitat, streambank stabilization and habitat improvements in the tributaries in the area, and habitat improvements in the Potomac River mainstem which might improve regional fisheries resources that could be affected by runoff from the project during and after construction. We understand that the stream mitigation package may or may not require a site search extensive enough to consider mitigation projects outside the Study Area. In case it may provide needed information for your mitigation search, we advise that the DNR Fisheries Service has conducted a preliminary investigation of potential locations for clean rubble placement in the Potomac River to create structures that would improve habitat for largemouth bass and other species. Consideration was given to rubble placement locations that might provide benefits further than simple sport fish attraction and concentration. Additional benefits could include juvenile fish refuge and creation of protected areas where submerged aquatic vegetation (SAV) can further establish in the river. Our preliminary information on potential rubble placement sites is available upon request. Only placement of clean rubble should be considered for these structures, and we note that preliminary comments that have been gathered indicate that rubble placement should be considered only for creation of submerged or emergent offshore structures, and not for shoreline stabilization or other shoreline structures.

Cynthia D. Simpson  
July 20, 2001  
Page 4

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We appreciate the attention that has been given in the draft document to natural resource assessment and protection. We advocate and support your continued efforts to optimize protection of natural resources during future planning phases for this project. If you have any questions concerning these comments, you may contact Greg Golden of my staff at 410-260-8334.

Sincerely,



Ray C. Dintaman, Jr., Director  
Environmental Review Unit



Parris N. Glending  
Governor

Kathleen Kennedy Townsend  
Lt. Governor

Harriet Tregoning  
Secretary

Ronald N. Young  
Deputy Secretary

July 18, 2001

Ms. Cynthia D. Simpson, Deputy Director  
Office of Planning & Preliminary Engineering  
Maryland State Highway Administration  
P.O. Box 717  
Baltimore, MD 21203-0717

Attention: Ms. Gay L. Olsen

**Re: Draft Environmental Impact Statement and Section 4(f) Evaluation -  
MD 210 Multi-Modal Study**

Dear Ms. Simpson:

Transportation planning staff at the Maryland Department of Planning have reviewed the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study. We are providing abbreviated comments through the Maryland State Clearinghouse as well as this letter with more extensive comments for SHA's consideration.

As noted in the DEIS, portions of the project alignment are outside the Prince George's County Priority Funding Area (PFA). Coordination between MDP and SHA/MDOT with regard to the PFA law compliance of the project is ongoing. It should be indicated in the sections discussing PFAs on page S- 4, S- 8, and IV-36.

Our specific comments on the DEIS document are provided as follows.

**Summary**

We suggest that a summary of the Secondary and Cumulative Effects Analysis be included in the Summary section.

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**II. Alternatives Considered**

A more detailed analysis of transit enhancements and provision of park and ride facilities should be included. Has the travel demand forecast for this project included the proposed transit enhancements and other TDM measures? How would transit enhancements influence people travel along the MD 210 corridor? What are the projected transit riderships under No-Build or Built Alternatives? How would HOV lanes, park and ride facility improvements, signal prioritization, and other strategies enhance transit usages? More detailed discussions will help the agencies and the public to better understand how non-SOV options could help to meet the project purpose and what non-SOV options could be part of the selected alternative.

More specific information on major pedestrian and bicycle facility improvements should be provided. The DEIS generally indicated that sidewalks and bike lanes will be considered for cross roads, but there is no information on the locations of the proposed sidewalks/bike lanes and associated safety improvements, e.g., (if any) crosswalks, safety islands, and pedestrian and bicycle friendly signals. SHA staff indicated to us previously that SHA tries to design or choose interchanges that will be bicycle/pedestrian-friendly. Some discussion on this effort may be useful.

The DEIS indicates that sidewalks and bike lanes would be provided only within the limits of roadway improvements. However, such an approach may not reasonably address the need for pedestrian and bicycles. Some extended sidewalks or bikeways may be needed to make reasonable connections to adjacent land uses.

There is no a particular analysis or discussion of how the proposed HOV lanes would help to improve travel along MD 210. Such an analysis should be included in Section II. G. to assist the evaluation of the Build Alternatives. Using ADT or vpd may not be the best way to present HOV lanes' traffic carrying ability. The major function of HOV lanes is to manage peak period traffic; therefore, peak period traffic data for HOV lanes should be considered. In addition, HOV lanes should be measured for the ability to carry persons rather than cars. Therefore, we suggest that SHA consider using "Persons per lane per day," or "persons per lane per hour," or "persons per lane AM/PM peak" traffic volumes for HOV lanes. For a comparison purpose, such traffic volume data may also be developed for the general use lanes.

**IV. Environmental Consequences – M. Secondary and Cumulative Effects Analysis**  
Evidently, SHA and the Study Team have made good efforts on collecting SCEA data and information. The SCEA information and data presented are useful for the analysis.

It appears to us that the consequences of cumulative impacts on some resources are downplayed by the analysis conclusions. These conclusions should either be revised or be clarified based on reasonable justifications:

- **Surface Waters** We believe that related MDE regulations can help to reduce some impacts to surface water but cannot help to minimize such impacts. It is not appropriate to use the word of "minimize" to describe the effect of MDE regulation control. The DEIS indicates that "the amount of developed land within

the SCEA boundary is projected to nearly triple” from 1997 to 2020. It also states that stormwater management practices cannot offset all of cumulative impacts on water quality due to significant transformation of forest/woodland land to built environment in the future.

- 8 • **Woodlands** The DEIS should provide an explanation of why current regulation controls could offset the substantial impacts to woodlands. Will there be net loss of woodland/forest resources in the SCEA area even with implementation of the state regulations? It is unclear to us.
- 9 • **Agricultural Land** In the last paragraph of Section f. (page IV-163), it should point out that in Prince George’s County since the agriculture areas between the Piscataway Creek and the Charles County line are allowed for low density residential development, such agricultural land can be impacted by future development.

The followings are the comments regarding Section 4. Secondary Effects and Section 5. Conclusions from page IV-163 to IV-166.

- 10 • Examination of the secondary effects on areas in PFA and in non-PFA is part of the Smart Growth implication evaluation. For this project and other SHA’s projects, discussions of secondary effects on PFAs and on non-PFAs should be integrated in the SCE analysis. PFA boundaries should be shown on related maps to assist the analysis. For instance, PFA boundaries could be overlaid with the SCEA development activities on Figure IV-10.
- 11 • On page IV-163, the definition of “secondary effects” is incomplete. As quoted in the SHA’s SCEA Guidelines, secondary effects “may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water on other natural systems, including ecosystems.”
- 12 • It should be noted that changes in land use pattern could occur without changing the type of development that is defined by a local master plan. In this project’s SCEA area, agricultural land, woodland and forest land could be changed to residential uses in accordance with local zoning regulations. This land use pattern change will increase impervious areas and population density. And the MD 210 project could trigger, facilitate and accommodate the residential development in these agricultural/woodland areas. As the result, growth rate could be altered. This is the secondary effect that should be addressed by the SCE analysis and documented in the DEIS. In this case, the type of development, i.e., residential uses may not be changed to other uses, e.g., to commercial uses, but the land use patterns would be changed. If the transformation from agricultural and forest land to low density residential uses occurs outside PFAs, that may be an adverse secondary effect that the State Smart Growth policy is intended to discourage.
- 13 • Sometimes highway improvements could provoke changes in the type of development. For instance, land near a new interchange could be rezoned from residential use to commercial uses, or from low density land uses to high density development. It is unclear whether such changes could occur along the MD 210 corridor after the roadway becomes a freeway. If the changes are within PFAs,

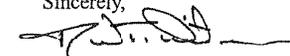
there might not be negative effects. An assessment of changes in development types (if any) may be included.

- 14 • On page IV-163, the statement, “Public facilities must be adequate to accommodate the growth envisioned by the master plans,” may not be consistent with the State Smart Growth policies. The State of Maryland intends to invest public facilities in PFAs to support and accommodate growth in PFAs. Environmentally insensitive low-density developments outside of PFAs, even they are called for by local master plans, should not be supported by state dollars. We suggest deleting the sentence.

15 All in all, the secondary and cumulative effects of the project should be thoroughly assessed and adequately documented. Implementation of current regulatory controls may not be the only approach to mitigate the SCE impacts. Additional SCEA mitigation strategies should be investigated. To our concerns, mitigations strategies to minimize land development impacts outside of PFAs may be explored.

Should you have any questions with regard to our comments, please do not hesitate to contact me at 410-767- 4564 or Bihui Xu at 410-767-4567.

Sincerely,



David T. Whitaker, AICP  
Principal Planner  
Transportation Planning

cc: Ron Young, MDP  
Joe Tassone, MDP  
Bob Rosenbush, MDP  
Nelson Castellanos, FHWA  
Barbara Rudnick, EPA  
Paul Wettlaufer, COE  
Ray Dintaman, DNR  
Attention: Greg Golden  
Elder Ghigiarelli, MDE  
Don Halligan, MDOT  
Fatimah Hasan, MDOT  
Michael Day, MHT  
Attention: Ms. Ann Bruder  
Ms. Beth Cole



Robert L. Ehrlich, Jr., Governor  
Michael S. Steele, Lt. Governor

Robert L. Flanagan, Secretary  
Neil J. Podewes, Administrator

MARYLAND DEPARTMENT OF TRANSPORTATION

RECEIVED

MAR 15 2004

BY WILSON T. BALLARD CO

March 12, 2004

Re: Project No. PG221A11  
MD 210 Multi-Modal Study  
I-95/I-495 to MD 228  
Prince George's County

Mr. David T. Whitaker, AICP  
Principal Planner  
Transportation Planning  
Maryland Department of Planning  
301 West Preston Street, Suite 1101  
Baltimore, MD 21201-2305

Attention: Ms. Bihui Xu

Dear Mr. Whitaker:

Thank you for your July 18, 2001 letter in which you provided comments on the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study. Since that time, the State Highway Administration (SHA) has developed and selected a modified alternative, Alternative 5A Modified. Your comments spanned a wide range of issues that needed to be addressed as we refined our preferred, and subsequently selected, alternative. In this intervening time period, we have conducted the necessary studies and coordination to adequately address the issues raised. The Selected Alternative and Conceptual Mitigation Package is attached. We anticipate that the Final Environmental Impact Statement (FEIS) will be approved by the Federal Highway Administration (FHWA) and circulated this Summer.

The following is provided in response to your letter, with response numbers corresponding to circled comment numbers shown on an attached copy of your letter. Where appropriate, we have addressed your comments as they relate to the SHA-Selected Alternative.

1. The SHA-Selected Alternative, Alternative 5A Modified, complies with the Linear Features Regulation and is therefore consistent with Maryland's Priority Places Strategy. This information will be cited in the Summary and Environmental Consequences Chapter of the FEIS.
2. A summary of the Secondary and Cumulative Effects Analysis will be included in the Summary section of the FEIS.

My telephone number/toll-free number is \_\_\_\_\_  
Maryland Relay Service for Impaired Hearing or Speech: 1.800.735.2268 Statewide Toll Free  
Street Address: 701 North Calvert Street • Baltimore, Maryland 21202 • Phone: 410.546.0300 • www.marylandroads.com

Mr. David T. Whitaker  
MD 210 Multi-Modal Study  
Page Two

3. Throughout the detailed studies portion of this Project Planning study, SHA worked closely with the Maryland Transit Administration (MTA), the Washington Metropolitan Area Transit Authority (WMATA) and Metropolitan Washington Council of Governments (MWCOG) to develop an enhanced transit network that would maximize transit use in the MD 210 corridor. This enhanced transit network was then modeled by MWCOG to determine effects on ridership and travel times for both High Occupancy Vehicle (HOV) lane and non-HOV lane scenarios. MTA and WMATA developed an all inclusive transit enhancement package consisting of additional express routes, reduced head-ways, and additional park and ride capacity that was considered the maximum practicable transit network enhancement. The detailed elements of the enhanced network are attached as part of MWCOG's MD 210 Corridor Study Regional Travel Demand Analysis Report, dated January 21, 2000 (attached). The basic conclusion of the MWCOG report was that transit enhancements alone in the MD 210 corridor would increase transit ridership by approximately 3,600 person-trips per day over baseline conditions; however, when combined with HOV lanes, all of the increased transit-ridership would be lost as these patrons shifted to the HOV lanes. HOV lanes would have ten times the benefit as transit in removing traffic from Limited Occupancy Vehicle (LOV) lanes. HOV lanes were modeled assuming direct connections to I-295 and the Capital Beltway (west only). Interchanges on MD 210 were assumed at all roadway crossings from Old Fort Road South to the Capital Beltway. The proposed transit service modifications that are assumed to be implemented along with the SHA-Selected Alternative, consistent with WMATA/MTA recommendations, will be outlined in the Effects on Public Transportation Services section of the Environmental Consequences chapter of the FEIS.
4. Pedestrian and bicycle studies and consideration of improvements along MD 210 have been completed. The Alternatives Considered and Environmental Consequences Chapters of the FEIS will contain more detail concerning the locations of sidewalks on the cross-roads, how transit stops will be accessed and how bicycle traffic will be accommodated. Details regarding dimensions of intersection islands and traffic signal phasing for pedestrians will be resolved during the final design phase.
5. SHA coordination with Prince George's County Department of Public Works and Transportation staff will continue into the design stage regarding many project issues, including sidewalk and bikeway issues. Given that the side roads are county facilities, SHA is limited as to what improvements can be made outside the limits of the approach roadway work near the interchanges.
6. Information concerning traffic volumes and levels of service associated with HOV and non-HOV alternatives is summarized in the DEIS. Figures II-2A through II-2C present ADTs of total, HOV and non-HOV traffic throughout the corridor along with intersection levels of service at at-grade intersections and ramp terminals. Table II-2 summarizes levels of service at ramp merge/diverge locations for all alternatives. During document preparation, it was

VI-158A

Mr. David T. Whitaker  
MD 210 Multi-Modal Study  
Page Three

believed that this was sufficient information for comparing alternatives without overwhelming the lay reader with extensive technical traffic information.

The SHA-Selected Alternative, Alternative 5A Modified does not include HOV lanes. The rationale for choosing this alternative was based on the analyses of the traffic operations, environmental impacts and public/agency input for each of the alternatives. Person-throughput, defined as the actual number of people (not just vehicles) using the highway in a given period of time, was not a significant factor in the decision-making process, except that public comments indicated that they were quite aware that the HOV alternatives (5B and 5C) provided more, and in their view excessive, capacity as compared to the non-HOV alternative. The public was overwhelmingly opposed to HOV because it would, in their view, induce further sprawl growth in Charles County and directly impact and adjacent to MD 210. SHA-Selected Alternative 5A is forecast to provide satisfactory traffic operations through the design year 2020, thus meeting purpose and need, with lower cost and environmental impact as compared to the HOV alternatives.

7. The FEIS will include a revised statement that the current regulatory framework for stormwater management and sediment and erosion control requirements administered by MDE would help to reduce the impacts to surface waters from development under the future land use scenario.
8. The Secondary and Cumulative Effects Analysis included in the FEIS will incorporate additional information with regard to the Maryland Reforestation Law requirements as discussed below:

*For every acre of forest cleared above the allowable clearing threshold, one acre of forest must be replaced, in accordance with the Natural Resources Article, Section 5-103, which became law on January 1, 1988. This reforestation would help offset the forest impacts. It is not certain, however, that all of the reforestation would be completed within the SCEA boundary, although it would likely be accomplished within the county where forest impacts occur. Therefore, impacts to woodlands within the SCEA boundary would likely contribute to cumulative forest resource impacts in the SCEA boundary, but because of reforestation, would not contribute substantially to cumulative impacts to woodlands in Prince George's County or Charles County. Other projects in the SCEA area potentially contributing to cumulative effects, such as private developments, are subject to county reforestation requirements that are at least equal to, and in certain cases more stringent than, the state requirements with regard to reforestation ratio requirements.*

Mr. David T. Whitaker  
MD 210 Multi-Modal Study  
Page Four

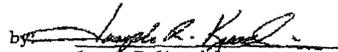
9. A statement will be included in the FEIS that the agricultural land zoned Residential - Agricultural, located generally between Piscataway Creek and the Charles County line, can be impacted by future development because the zoning classification allows low density residential development.
10. No land use changes are anticipated with the SHA-Selected Alternative. Subsequently, no secondary effects in terms of induced changes in the type of development or land use as envisioned in the area master plans are anticipated. The FEIS will include this conclusion.
11. The full definition of secondary effects, as quoted in SHA's SCEA Guidelines, is stated at the beginning of the SCEA on page IV-133 of the DEIS. This definition will also be included in the FEIS.
- 12/13. The level of improvement to MD 210 proposed by the SHA-Selected Alternative is consistent with the current Subregion V Approved Master Plan, which assumes MD 210 as a freeway from I-295 to MD 228. The speculative nature of potential land use and zoning changes cited in your comments are not reasonably foreseeable.
14. The FEIS will not include the following statement: "Public facilities must be adequate to accommodate the growth envisioned by the master plans."
15. With regard to the comment that additional SCEA mitigation strategies should be investigated, SHA is not in a position to mitigate directly for impacts caused by other projects, such as by developers or by the county. Substantial mitigation is proposed for the direct impacts anticipated by the SHA-Selected Alternative. This mitigation of direct impacts does, in turn, provide some mitigation for the cumulative impacts that may take place in the SCEA area.

Mr. David T. Whitaker  
MD 210 Multi-Modal Study  
Page Five

Thank you again for your comments and suggestions. Should you have any additional questions, please feel free to contact the environment manager, Ms. Heather Amick at (410) 545-8526 or the project manager, Mr. Mark Lotz at (410) 363-0150.

Sincerely,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

by   
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

Attachments

cc: Ms. Heather Amick, SHA-PPD  
Mr. Bruce Grey, SHA-PPD  
Mr. Joseph Kresslein, SHA-PPD  
Mr. Mark Lotz, WTB  
Ms. Chisa Winstead, SHA-PPD

VI-158C



Parris N. Glendening  
Governor  
Kathleen Kennedy Townsend  
Lt. Governor

Roy W. Kienitz  
Secretary  
Ronald N. Young  
Deputy Secretary

August 03, 2001

Ms. Cynthia Simpson, Deputy Director  
Office of Planning and Preliminary Engineering  
Maryland Department of Transportation  
707 North Calvert Street, Mail Stop C-301  
Baltimore, MD 21202

**REVIEW AND RECOMMENDATION**

State Application Identifier: MD20010615-0487  
Description: Draft Environmental Impact Statement and Section 4(f) Evaluation - MD 210 Multi-Modal Study From I-95/I-495 (Capital Beltway) to MD 228  
Applicant: Maryland Department of Transportation  
Location: Prince George's County  
Approving Authority: U.S. Department of Transportation  
Recommendation: Endorsement with Qualifying Comments

Dear Ms. Simpson:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 14.24.04, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter with attachments, constitutes the State process review and recommendation. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Departments of Environment, Housing and Community Development including the Maryland Historical Trust, Natural Resources, Charles and Prince George's Counties; and the Maryland Department of Planning.

As noted in the DEIS, portions of the project alignment are outside Prince George's County Priority Funding Area (PFA). Coordination between our department and SHA/MDOT with regards to the PFA law compliance of the project is ongoing. In general, we support the MD 210 multi-modal study but we urge SHA to conduct a true multi-modal analysis for this project. The letter we addressed to you, dated July 18, 2001, contains our detailed comments on this project.

The Maryland Departments of Housing and Community Development including the Maryland Historical Trust, Natural Resources, and Charles County found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of the Environment, and Prince George's County found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below and discussed in the attached comments.

**Summary of Comments:**

The Maryland Historical Trust has determined that the project will have "no adverse effect" on historic properties and that the federal and/or State historic preservation requirements have been met.

361 West Preston Street • Suite 1101 • Baltimore, Maryland 21201-2305  
Tel: 410.767.4500 • Fax: 410.767.4490 • Toll Free: 1.800.767.6272 • TTY Users: Maryland Relay  
Internet: www.mdp.state.md.us

Ms. Cynthia Simpson  
August 03, 2001  
Page 2

The Maryland Department of the Environment in their attached comments, addressed issues relating to solid waste, and underground storage tanks.

Prince George's County Department of Planning made the following comments: "The study area is located within a geographic area covered by two master plans: the 1981 Subregion V Master Plan and the 993 Subregion VII Master Plan. The master plans recommend HOV lanes within this corridor as well as interchanges at all street crossings. While alternative 5A facilitates travel demand in the short-term, as a long-term solution, it is not compatible with our master plans due to the continued presence of at-grade intersections. Alternatives 5B and 5C incorporate an HCV concept [as] the current master plans recommend. [Therefore], it would appear that Alternative 5C is the option that is most compatible with our master plans".

Prince George's County Department of Public Works and Transportation made the following comments: "Alternative 5A Capacity Option 2 is the preferred option among the proposed alternative solutions, as it includes the greatest number of interchanges considered necessary to achieve Level of Service D (LOS D) or better during the peak periods. Due to the apparent local opposition to Alternatives 5B and 5C from the affected communities, the Department of Public Works and Transportation will further analyze the alternatives and, therefore, will take no position regarding HOV lanes along the MD Route 210 project at this time".

Any statement of consideration given to the comments should be submitted to the approving authority, with a copy to the State Clearinghouse. Additionally, the State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the recommendation cannot be accommodated by the approving authority.

Please remember, you must comply with all applicable state and local laws and regulations. If you have any questions about the comments contained in this letter or how to proceed, please contact the State Clearinghouse at (410) 767-4490. Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.

We appreciate your attention to the intergovernmental review process and look forward to your continued cooperation. If you need to contact a staff person, please call 410-767-4490.

Sincerely,

Linda C. Janey, I.D.  
Director, Clearinghouse & Plan Review Unit

LCJ:AM:da

Enclosures

(\* indicates with attachments)

- cc: Joane Mueller - MDE
- Ray Dintaman - DNR
- Steve Magoon - CHAS
- Beverly Warfield - PGEO
- Kathryn Orosz - DHCD
- Joe Tassone - MDPC
- Bob Rosenbush - MDPM

VI-159



Maryland Department of Planning

Farris N. Glendening
Governor
Kathleen Kennedy Townsend
Lt. Governor

Roy W. Kienitz
Secretary
Ronald N. Young
Deputy Secretary

MEMORANDUM

Please complete this form and return it to the State Clearinghouse upon receipt of notification that the project has been approved or not approved by the approving authority.

TO: Maryland State Clearinghouse
Maryland Department of Planning
301 West Preston Street
Room 1104
Baltimore, MD 21201-2365
DATE:
FROM:
PHONE:
RE: State Application Identifier: MD20010515-0487
Project Description: Draft Environmental Impact Statement and Section 4(f) Evaluation - MD 210 Multi-Modal Study From I-95/I-495 (Capital Beltway) to MD 228

PROJECT APPROVAL
This project/plan is:
Name of Approving Authority:
Date Approved:
FUNDING APPROVAL
The funding (if applicable) has been approved for the period of
OTHER

VI-160

PLEASE COMPLETE YOUR REVIEW & RECOMMENDATION BEFORE June 11, 2001

RETURN COMPLETED FORM TO: Linda C. Janey, J.D., Director, Clearinghouse & Plan Review Unit, Maryland Department of Planning, 301 West Preston Street, Room 1104, Baltimore, Maryland 21201-2365

State Application Identifier: MD20010515-0487
Clearinghouse Contact: Azz Mammad
Applicant: Maryland Department of Transportation
Description: Draft Environmental Impact Statement and Section 4(f) Evaluation - MD 210 Multi-Modal Study From I-95/I-495 (Capital Beltway) to MD 228

Based on a Review of the Information Provided, We Have (checked) Checked the Appropriate Determination Below
CONSISTENT RESPONSES - STATE AGENCIES ONLY
C1 It is consistent with our plans, programs, and objectives.
C2 It is consistent with the policies contained in Executive Order 01.01.1992.27 (Maryland Economic Growth, Resource Protection, and Planning Act of 1992), Executive Order 01.01.1998.04 (Smart Growth and Neighborhood Conservation Policy), and our plans, programs, and objectives.
C3 (MHT ONLY) It has been determined that the project will have "no effect" on historic properties and that the federal and/or state historic preservation requirements have been met.
C4 (DNR ONLY) It has been determined that this project is in the Coastal Zone and is not inconsistent with the Maryland Coastal Zone Management Program.
C7 (MDP ONLY) It is consistent with the requirements of State Finance and Procurement Article 5-7B-02; 03;04 and 05 Smart Growth and Neighborhood Conservation (Priority Funding Areas).
CONSISTENT RESPONSES - COUNTY & LOCAL AGENCIES ONLY
C5 It is consistent with our plans, programs, and objectives.
C6 It is consistent with the Economic Growth, Resource Protection, and Planning Visions (Planning Act of 1992), State Finance and Procurement Article 5-7B Smart Growth and Neighborhood Conservation (Priority Funding Areas), and our plans, programs, and objectives.
OTHER RESPONSES - ALL AGENCIES
R1 GENERALLY CONSISTENT WITH QUALIFYING COMMENTS: It is generally consistent with our plans, programs and objectives, but the attached qualifying comments is submitted for consideration.
R2 CONTINGENT UPON CERTAIN ACTIONS: It is generally consistent with our plans, programs and objectives contingent upon certain actions being taken as noted in the attached comment.
R3 NOT CONSISTENT: It raises problems concerning compatibility with our plans, programs, objectives, or Planning Act visions/policies; or it may duplicate existing program activities, as indicated in the attached comment. If a meeting with the applicant is requested, please check here.
R4 ADDITIONAL INFORMATION REQUESTED: Additional information is required to complete the review. The information needed is identified below. If an extension of the review period is requested, please check here.
R5 FURTHER INTEREST: Due to further interest/questions concerning this project, we request that the Clearinghouse set up a conference with the applicant.
R6 SUPPORTS "Smart Growth" and Federal Executive Order 12872 (Federal Space Management), which directs federal agencies to locate facilities in urban areas.

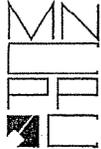
Attach additional comments if necessary OR use the spaces below for brief comments.

Name: Joane D. Mueller
Organization: TARSA/MDE
Address: 2500 Broening Highway Baltimore MD 21224 (410) 631-4120
Signature: [Signature]
Date Completed: 6/2/01
Check here if additional comments attached.

### **3. LOCAL**

**SUMMARY OF AGENCY COMMENTS ON DEIS (LOCAL)**

<b>ENVIRONMENTAL REVIEW AND REGULATORY AGENCIES</b>		<b>RESPONSE LOCATION (Section &amp; Page #)</b>
<p>Maryland – National Capital Park and Planning Commission Dept. of Parks and Recreation Date: 7/15/01 (see page VI-162)</p>	<ul style="list-style-type: none"> <li>• Parkland to be protected from debris, sedimentation and stormwater runoff. Coordinate with agency if any changes to Henson Creek Stream Valley Park trail. Keep agency apprised of activity within the Oxon Hill Manor View shed.</li> </ul>	<p>See page VI-162</p>
<p>Maryland – National Capital Park and Planning Commission Countywide Planning Division Date: 7/23/01 (see page VI-164)</p>	<ul style="list-style-type: none"> <li>• Build Alternatives are consistent with area Master Plan recommendations. Prince George's County Council has designated MD 210 as a growth policy corridor in their Adopted and Approved Biennial Growth Policy Plan. Department will not support No-Build Alternative. Alternative 5A not fully compatible with master plan. Alternative 5B, 5C is most compatible with the master plans. Strongly supports development of sidewalks and bike lanes on both sides of all side roads; Supports development of wide shoulders on MD 210 and allow access to bicycle commuters. Maintain Henson Creek Stream Valley Trail tunnel through the planning and development of the project. Preserve the opportunity for development of a stream valley trail along Piscataway Creek. The MD 210 project should tie into and complement a proposed Oxon Hill Road interchange. Bicycle sensitive traffic detectors or push button light activators are suggested for the Farmington and Old Fort Road intersections.</li> </ul>	<p>See page VI-164</p>
<p>Prince George's County Fire/EMS Department Headquarters Date: 6/12/01 (see page VI-168)</p>	<ul style="list-style-type: none"> <li>• Shoulders should be provided on MD 210 northbound and southbound. Opticom should be provided for Fire/EMS use on all traffic lights.</li> </ul>	<p>See page VI-168</p>
<p>Prince George's County Fire/EMS Department Headquarters Date: 8/30/01 (see page VI-169)</p>	<ul style="list-style-type: none"> <li>• Supports Alternative 5C, Option B @ Palmer Road/Livingston Road, Option C @ Old Fort Rd North, Option D @ FT. Washington Rd, Options C, D or E @ Swan Creek Rd/Livingston Rd, Option C @ Old Fort Rd South.</li> </ul>	<p>See page VI-169</p>
<p>Washington Metropolitan Area Transit Authority Date: 8/1/01 (see page VI-171)</p>	<ul style="list-style-type: none"> <li>• Recommend preserving a preferential option for transit and ridesharing in the corridor. Support HOV lanes. Prefer direct access ramps to HOV lanes and direct connections from HOV lanes to I-295 and I-95/I-495. Continue coordination between the MD 210 study team and the Woodrow Wilson Bridge design team.</li> </ul>	<p>See page VI-171</p>



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION  
 Department of Parks and Recreation  
 6600 Kenilworth Avenue Riverdale, Maryland 20737



Maryland Department of Transportation  
 State Highway Administration

September 18, 2001

Parris N. Glendening  
 Governor  
 John D. Porcari  
 Secretary  
 Parker F. Williams  
 Administrator

July 15, 2001

Ms. Cynthia Simpson, Deputy Director  
 Office of Planning and Preliminary Engineering  
 State Highway Administration  
 707 North Calvert Street  
 Mailstop C-301  
 Baltimore, Maryland 21202

Ms. Marilyn Lewis, Senior Planner  
 Park Planning and Development  
 Maryland-National Capital Park and Planning Commission  
 Department of Parks and Recreation  
 6600 Kenilworth Avenue  
 Riverdale, Maryland 20737

Dear Ms. Lewis:

Thank you for your comments regarding the MD 210 Multi-Modal Study Draft Environmental Impact Statement (DEIS). The Maryland State Highway Administration (SHA) has reviewed your letter and would like to take this opportunity to address your questions and comments.

Strict enforcement of the SHA sediment and erosion control procedures and the Maryland Department of the Environment (MDE) stormwater management regulations will minimize water quality effects during and after construction. Wherever possible, mitigation requirements will be met within the areas of impact.

We understand that the Henson Creek Stream Valley Park trail is a heavily used resource within the project area. We will coordinate with your agency during the Final Design phase of the project to ensure that any changes to the trail will meet or exceed current standards. In addition, we will keep you apprised of activity within the Oxon Hill Manor view shed through copy of our coordination with the Maryland Historical Trust.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
 Deputy Director  
 Office of Planning and  
 Preliminary Engineering

RE: Maryland 210, Multi-Modal Study (Indian Head Highway)

The Division of Park Planning and Development, in the Department of Parks and Recreation of the Maryland-National Capital Park & Planning Commission, is responsible for the review, approval and coordination of any and all changes and/or impacts to park land (and any associated mitigation).

It is imperative that park land, including the stream valleys be protected from debris, sedimentation and storm water run off, for the construction of the MD Rte 210. The stream valleys and our associated park land are frequently impacted by development from surrounding upland areas. It is important that mitigation due to impact/disturbance, as associated with this project, be handled within the areas of impact.

Equally important, is the major trail which runs through the Henson Creek Stream Valley Park. This is a multi-modal trail accommodating hikers/bikers and equestrians. This one of the most heavily used trail systems in the southern region of Prince George's County. Health, safety, welfare and maintenance regarding our trails are paramount. Any changes to the existing conditions must meet or exceed current standards.

We are also concerned with potential impacts to the Oxon Hill Manor and its view shed. This property is not only an historic site (on the National Historic Register), but a revenue producing facility, therefore, we must be kept apprized of any associated activity within the area.

My telephone number is \_\_\_\_\_

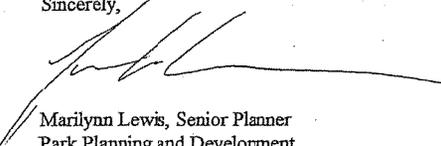
Maryland Relay Service for Impaired Hearing or Speech  
 1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
 Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI-162

Thank you for the opportunity to submit comments on this Draft Environmental Impact Statement. We look forward to working with your representatives on this project. If you have any question, please contact me at 301-699-2574 or at [lewis\\_marilynn@pgparks.com](mailto:lewis_marilynn@pgparks.com).

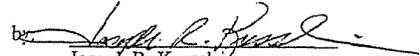
Sincerely,



Marilynn Lewis, Senior Planner  
Park Planning and Development

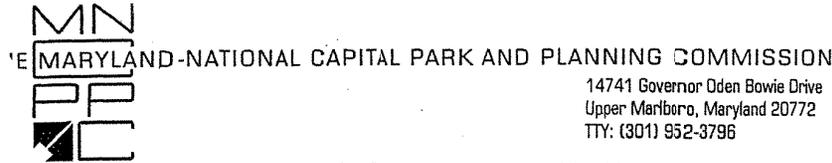
cc: Charles Montrie, Planning Supervisor  
Eileen Nivera, Planner Coordinator

Ms. Marilyn Lewis  
Page Two



Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

cc: Ms. Heather Amick, State Highway Administration  
~~Mr. Dennis M. Atkins~~, State Highway Administration  
Ms. Elizabeth Cole, Maryland Historical Trust  
Mr. Greg Golden, Maryland Department of Natural Resources  
Mr. Bruce Grey, State Highway Administration  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration  
Mr. Donald Sparklin, State Highway Administration



Prince George's County Planning Department  
Office of the Planning Director

14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772  
TTY: (301) 952-3796

(301) 952-3595  
www.mncppc.org

July 23, 2001

Ms. Cynthia Simpson  
Deputy Director  
Office Of Planning and Preliminary Engineering  
State Highway Administration  
707 North Calvert Street  
Mailstop C-301  
Baltimore, Maryland 21202

**RE: Draft Environmental Impact Statement  
MD 210 Multi-Modal Study**

Dear Ms. Simpson:

As requested in the referral of the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study, this letter transmits the Planning Department's staff comments on the proposed alternatives. Staff from our Transportation Planning Section, including the Trails Planner, coordinated this review with our Community Planning and Environmental Planning staff. Comments on the DEIS are contained in this letter for your use in preparing the Final EIS.

**CONSISTENCY WITH MASTER PLANS**

The study area is located within a geographic area covered by two master plans: the Subregion VII Master Plan, approved in October 1981, and the Subregion V Master Plan approved in September 1993. Both master plans recommend full access controls along MD 210, including interchanges, service roads and collector-distributor roads. The Subregion V Master Plan also included a recommendation for HOV lanes along MD 210 in order to accommodate the travel demand anticipated with master plan build out in both Prince George's and Charles Counties. Both master plans also specified locations for park and ride facilities in the MD 210 corridor which were subsequently constructed or are currently under design.

Given that the recommendations in these master plans are now 8-20 years old, we believe that most of the build alternatives are consistent with the master plans' concept of a multi-modal controlled-access facility. To the extent that the interchanges, service roads, collector-distributor roads, HOV lanes and park and ride facilities are part of the proposed alternatives, they are consistent with the master plans' recommendations for the transportation improvements needed



Maryland Department of Transportation  
State Highway Administration

Parris N. Glendening  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

October 4, 2001

Dr. Fern Piret  
Prince George's County Planning Director  
The Maryland-National Capital Park and Planning Commission  
14741 Governor Oden Bowie Drive  
Upper Marlboro, Maryland 20772

Dear Dr. Piret:

Thank you for your letter dated July 23, 2001, providing comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the MD 210 Multi-Modal Study. The purpose of this letter is to address the concerns identified in your letter.

We acknowledge your conclusion that the Build Alternatives are consistent with the area Master Plans' recommendations for the transportation improvements needed for the build out of the MD 210 corridor, to the extent that the interchanges, service roads, HOV lanes and park & ride facilities are part of the proposed alternatives.

The Final Environmental Impact Statement (FEIS) will reflect the Prince George's County Council's designation of MD 210 as a growth policy corridor from the District of Columbia to Livingston Road in their Adopted and Approved Biennial Growth Policy Plan (BGP?).

The projected average daily traffic (ADT) volume along Oxon Hill Road has been reviewed and updated to reflect the development of National Harbor. The revised projected 2020 ADT volume along Oxon Hill Road in the vicinity of the MD 210 intersection ranges from 43,000 to 45,000 vehicles per day. The FEIS will reflect the revised ADT

Your support for Alternative 5B or 5C with the maximum number of interchanges under consideration (Capacity Option 2) will be considered in the on-going process of developing a Preferred Alternative. We furthermore acknowledge your support for Alternative 5A as a short-term solution due to the continued presence of at-grade intersections.

The following responses address specific numbered comments contained in your letter regarding potential impacts of the alternatives presented in the DEIS:

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

VI-164

July 23, 2001

for build out of the MD 210 corridor. Lesser improvements to at-grade intersections along MD 210 will provide the capacity needed up to the year 2025, and would therefore be considered as staging elements of the master plan.

Commission 2000 has recommended that MD 210 be designated as a corridor in the General Plan Update. The Prince George's County Council has accepted this recommendation and, in their Adopted and Approved Biennial Growth Policy Plan (BGPP), designated MD 210 as a growth policy corridor from the District of Columbia to Livingston Road.

#### PREVIOUS TRANSPORTATION STUDIES

In 1990, the *Statewide Commuter Assistance Study* examined future needs in the MD 210 corridor, and recommended a program which includes enhanced express bus service along with intersection improvements to provide a fully access controlled facility between MD 228 and the Capital Beltway (I-95/495).

#### TRAFFIC FORECASTS

Under the Purpose and Need section of the DEIS, is a graphic (Figure I-1) which depicts the forecasted average daily traffic (ADT) volume along Oxon Hill Road, east of MD 210 as 25,800 vehicles. This figure does not appear to reflect the development of National Harbor and should be revised in the Final EIS.

#### COMMENTS ON THE ALTERNATIVES

- Alternative 1. Existing Roadway (No-Build): This alternative is not compatible with any of our master plans, and consequently, would not be supported by this department.
- Alternative 5A. Intersection Improvements: This alternative provides some at-grade intersection improvements towards the southern end of the corridor while intersections at the northern end of the corridor would be upgraded to interchanges. While this alternative will facilitate travel demand in the short term, as a long-term solution, it is not fully compatible with our master plans due to the continued presence of at-grade intersections.
- Alternatives 5B/C. HOV Lanes: These alternatives incorporate an HOV concept. As mentioned previously, the current master plans for this corridor recommend HOV lanes within the corridor as well as interchanges at all street crossings. Based on the alternatives presented, it would appear that Alternative 5C is the option that is most compatible with our master plans.

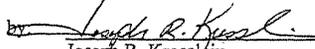
Dr. Fern Piret  
Page Two

1. and 6. Safe bicycle and pedestrian crossings will be an important consideration in the selection and refinement of the Preferred Alternative. On-going studies to identify appropriate "Thinking Beyond the Pavement" measures will comprehensively address transit accessibility, community cohesion, aesthetic and pedestrian/bicycle issues. During the design phase, SHA will consider the provision of amenities such as bicycle friendly traffic control devices. We will continue to coordinate with your office regarding this suggestion. We have noted that the Potomac Heritage On-Road Bike Route crosses MD 210 at both Farmington Road and Old Fort Road.
2. The SHA Bicycle Coordinator is currently undertaking a study of the available and planned bicycle facilities and anticipated needs for the entire study area, including an evaluation of parallel corridors. The results of this study will be used to formulate recommendations for bicycle accommodation on mainline MD 210 (e.g., shoulder use).
3. SHA staff met on-site with M-NCPPC representatives on July 20, 2001 to discuss issues related to the Henson Creek Stream Valley Trail. Except for potential minor disruption during construction, this trail underpass will be fully preserved with the proposed MD 210 Build Alternatives.
4. None of the MD 210 Build Alternatives preclude in any way the future development of a stream valley trail along Piscataway Creek under MD 210.
5. Coordination is on-going with the Prince George's County Department of Public Works and Transportation regarding the county's Oxon Hill Road capital improvement project.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Arnick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

by   
Joseph R. Kresslein  
Assistant Division Chief  
Project Planning Division

July 23, 2001

Dr. Fern Piret  
Page Three

**POTENTIAL IMPACTS**

Listed below are the master plan trails that could potentially be affected by the project, as well as other issues for consideration during the planning and development of this project.

1. Staff strongly supports the improvement of all intersections within the study area in a way that accommodates bicycles and pedestrian use. More specifically, staff supports the development of five-foot wide sidewalks and bike lanes (as shown on Figure II-1D) on both sides of all side roads. Bike lanes should be designed in accordance with the 1999 AASHTO Guide for the Development of Bicycle Facilities. These improvements should be made for both at-grade intersections and interchanges. Particular attention should be given to safe bicycle and pedestrian crossings at the on and off-ramps of these interchanges.
2. Staff also supports the development of the MD 210 mainline with wide shoulders, as indicated on page II-3. It is strongly encouraged that access to these shoulders be given to bicycle commuters. Although north-south access can be accommodated on adjacent local roads, bicycle commuters, like all commuters, are interested in the fastest, most direct route to their destination. In many cases in this corridor, that route is MD 210. Various jurisdictions across the country have shown that the shoulders of limited access highways can be used safely by bicyclists if designed properly. The use of shoulders on limited access highways for bicycles is supported by the Maryland Bicycle and Pedestrian Advisory Committee.
3. The existing M-NCPPC Henson Creek Stream Valley Trail goes under MD 210 via a tunnel. This existing trail provides recreation along the stream valley, as well as a connection between communities on both sides of MD 210. This tunnel should be maintained through the planning and development of this project.
4. The *Subregion V Master Plan* recommends a stream valley trail along Piscataway Creek. As this trail will also go under MD 210, the opportunity for the development of the trail under the roadway in the future should be preserved.
5. Discussions are currently underway with regards to the county's Oxon Hill Road capital improvement project. This project will incorporate some form of bicycle and pedestrian accommodations. The exact type of facility to be built has yet to be determined. SHA plans for this interchange should tie into and complement what is ultimately decided upon and built for Oxon Hill Road.

cc: Ms. Heather Amick, SHA  
Mr. Dennis M. Atkins, SHA  
Mr. Joseph Kresslein, SHA  
Mr. Bruce Grey, SHA  
Mr. Mark Lotz, W.T. Ballard Co.  
Mr. Harvey Muller, SHA, (w/incoming)  
Ms. Melinda Peters, SHA

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Ms. Cynthia Simpson  
Page 4

July 23, 2001

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6. The Potomac Heritage On-Road Bike Route, which was recently designated in Prince George's County, crosses MD 210 at both Farmington Road and Old Fort Road. Bicycle sensitive traffic detectors or bicycle-friendly push-button light activators are suggested at these locations.

#### RECOMMENDATION

In reviewing all of the alternatives and options presented, our department concludes that with some modification, both Alternative 5B and 5C will provide interchanges along the corridor as well as HOV lanes. Consequently, the planning department would be supportive of either of these alternatives.

In closing, I thank you again for the opportunity to comment on the DEIS. If there are further questions or comments concerning transportation issues along the corridor, please contact Mr. Glen Burton of our Countywide Planning Division at 301-952-3577 or [gburton@mncppc.state.md.us](mailto:gburton@mncppc.state.md.us).

Sincerely,



Fern Piret  
County Planning Director

c: David L. Goode, Council Administrator  
Elizabeth Hewlett, Chairman PGCPB  
Betty Hager Francis, Director, DPW&T  
Nick Motta, Division Chief, Countywide Planning Division  
Eric Foster, Supervisor, Countywide Planning Section

VI-167



THE PRINCE GEORGE'S COUNTY GOVERNMENT

Fire/EMS Department Headquarters

Office of the Fire Chief



June 12, 2001

Nelson Castellanos
Division Administrator
Federal Highway Administration
The Rotunda - Suite 220
711 West 40th Street
Baltimore, Maryland 21211

Post-it Fax Note form with fields for To, From, Co., Phone, and Fax.

Dear Mr. Castellanos:

Thank you for allowing the Prince George's County Fire/Emergency Medical Services (EMS) Department to review the MD 210 Multi-Modal Study (Draft Environmental Impact Statement and Section 4(f) Evaluation).

For the safety of the public, it is highly recommended that shoulders be provided on the north and south bound of MD 210 and opticom be provided for Fire/EMS Department use on all the traffic lights.

If you have any questions, please contact Kenny Oladeinde at 301-583-1836.

Bob Patrick Opticom

Sincerely,
[Signature]
Ronald J. Siarnicki
Fire Chief

RJS:dls

Copy to: Kenny Oladeinde, Project Coordinator, Fire Prevention and Investigations

9201 Basil Court, Fourth Floor East
Largo, Maryland 20774
VOICE-(301) 883-5200 FAX-(301) 883-5212 TDD-(301) 925-5167



U.S. Department of Transportation
Federal Highway Administration

Maryland Division
The Rotunda
711 West 40th Street, Suite 220
Baltimore, Maryland 21211

November 5, 2001

Project No. AW534B11
MD 210 Multi-modal Study
I-95/I-495 to MD 228
Draft EIS
Prince George's County, Maryland

Mr. Ronald J. Siarnicki
Fire Chief
Prince George's County Government
Fire/EMS Department Headquarters
9201 Basil Court
Largo, Maryland 20774

Dear Mr. Siarnicki:

Thank you for your letter on the Draft Environmental Impact Statement (DEIS) for the MD 210 Multi-Modal Study. The Federal Highway Administration (FHWA) and the Maryland State Highway Administration (SHA) have reviewed your letter and would like to take this opportunity to address your questions and comments.

You recommended that shoulders and opticom be provided on north and southbound MD 210. All build alternatives provide shoulders along the MD 210 mainline; Alternative 5A provides 10-foot shoulders and Alternatives 5B and 5C provide 8-foot shoulders.

Thank you again for your comments. If you have any comments or questions, please feel free to call Ms. Mary Huie of my staff at 703-519-9800.

Sincerely yours,
[Signature]
Nelson J. Castellanos
Division Administrator

cc: Ms. Heather Amick, SHA Environmental Manager, PPD
Mr. Dennis Atkins, SHA Project Manager, PPD
Mr. Joseph Kresslein, SHA Assistant Division Chief, PPD
Mr. Jim Wynn, SHA Assistant Division Chief, PPD

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THE PRINCE GEORGE'S COUNTY GOVERNMENT

Fire/EMS Department Headquarters

Office of the Fire Chief



August 30, 2001

Dennis Atkins, Project Manager
Project Planning Division
Maryland State Highway Administration
Mailstop C-301
707 North Calvert Street
Baltimore, Maryland 21202

Dear Mr. Atkins:

On June 21, 2001, personnel from the Prince George's County Fire/Emergency Medical Services (EMS) Department were afforded the opportunity to attend the Location/Design Public Hearing at Friendly High School. Previously, personnel attended the Alternatives Workshop in December, 1998. The Maryland Route 210 Corridor is a major north/south traffic artery in Prince George's County. The Woodrow Wilson Bridge project is currently underway with a scheduled completion date of 2007 and the National Harbor project is in its preliminary stages with approval from the County Council anticipated in the fall of this year. These factors, combined with the fact that many of the eleven intersections on MD 210 identified in the study are operating at or near capacity, make major roadway improvement a necessity.

I would be remiss in my duties if I did not emphasize the relation between roadway improvements and a decline in motor vehicle crashes. Anytime an at-grade, traffic signal controlled intersection is replaced with a grade-separated interchange, the probability of motor vehicle crashes occurring is reduced significantly. Prince George's County Department of Public Works and Transportation's Neighborhood Traffic Management Program has been instrumental in identifying measures, such as traffic circles and speed humps, that serve to slow vehicles down in our neighborhoods. Combine these measures with the advent of "red light cameras" and one thing is painfully clear, our drivers are traveling at greater speeds which increases the possibility of human error contributing to motor vehicle crashes. Your booklet states the possibility of reducing the number of motor vehicle crashes by two-thirds if options discussed are constructed.

After careful review of the options discussed in your booklet, the position of the Prince George's County Fire/EMS Department is to recommend Alternative 5-C. Concurrent flow HOV lanes will be needed due to considerable traffic flow both north and south on MD 210. This traffic flow is anticipated to occur during non-rush hour periods because of the attraction to National Harbor.

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Largo, Maryland 20774

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Maryland Department of Transportation
State Highway Administration

October 4, 2001

Parris N. Glendening
Governor
John D. Porcari
Secretary
Parker F. Williams
Administrator

Mr. Ronald D. Blackwell
Acting Fire Chief
The Prince George's County Government
Fire/EMS Department Headquarters
9201 Basil Court
Fourth Floor East
Largo, Maryland 20774

Dear Mr. Blackwell:

Thank you for your comments regarding the MD 210 Multi-Modal Study. The Maryland State Highway Administration (SHA) would like to take this opportunity to address your comments.

Your support for Alternative 5C will be considered in the on-going process of developing a Preferred Alternative. In addition, we acknowledge your support for Option B for Palmer Road/Livingston Road, Option C for Old Fort Road North, Option D for Fort Washington Road, Options C, D, or E for Livingston Road/Swan Creek Road and Option C for Old Fort Road South. The SHA appreciates your recommendations and will consider them in the Preferred Alternative selection process.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8526. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson
Deputy Director
Office of Planning and
Preliminary Engineering

by: [Signature]
Joseph R. Kresslein
Assistant Division Chief
Project Planning Division

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717
Street Address: 707 North Calvert Street • Baltimore, Maryland 21202

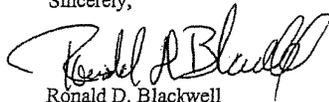
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Dennis Atkins, Project Manager  
Page 2

There does not appear to be any adverse impact on the services provided by the Fire/EMS Department to the citizens of or visitors to Prince George's County as a result of any of your options for Alternative 5-C. As stated earlier, eliminating traffic signals reduces motor vehicle crashes. With that in mind, there are preferred options with regards to public safety. Option B for location C (Palmer Road/Livingston Road) is preferred due to the lack of a cloverleaf which contribute to motor vehicle crashes when drivers do not maintain a safe speed. Option C for location D (Old Fort Road North) is preferred due to the lack of a cloverleaf. Option D for location E (Fort Washington Road) is preferred because option C includes traffic signals and is close to the Tantallon Shopping Center. Options C, D, or E for Location F (Livingston Road/Swan Creek Road) are preferred over option B. Option C for Location G (Old Fort Road South) is also preferred due to the elimination of traffic signals.

I would like to take this opportunity to express my gratification to the Maryland Department of Transportation for allowing the Prince George's County Fire/EMS Department the opportunity to provide feedback throughout the MD 210 planning process. If I may be of further assistance, please contact me.

Sincerely,



Ronald D. Blackwell  
Acting Fire Chief

Mr. Ronald D. Blackwell  
Page Two

cc: Ms. Heather Amick, State Highway Administration  
Mr. Dennis M. Atkins, State Highway Administration  
Mr. Bruce Grey, State Highway Administration  
Ms. Mary Huie, Federal Highway Administration  
Mr. Joseph Kresslein, State Highway Administration

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RDB:mlb  
Rt210



Maryland Department of Transportation  
State Highway Administration

October 26, 2001

Parris N. Glanville  
Governor  
John D. Porcari  
Secretary  
Parker F. Williams  
Administrator

Mr. Richard F. Stevens, Director  
Office of Business Planning and Development  
Washington Metropolitan Area Transit Authority  
600 Fifth Street, NW  
Washington, D.C. 20001

Dear Mr. Stevens:

Thank you for your letter dated August 1, 2001, providing comments on the Draft Environmental Impact Statement (DEIS)/Section 4(f) Evaluation for the MD 210 Multi-Modal Study. The purpose of this letter is to address some of the concerns outlined in your letter.

We acknowledge your recommendation to preserve a preferential option for transit and ridesharing in the corridor and your position that whether the High Occupancy Vehicle (HOV) lanes are concurrent-flow or barrier-separated is not as important as whether the HOV lanes are there at all.

SHA welcomes the opportunity to coordinate with WMATA to address many of the issues raised in your letter during the project planning phase of the project and agree that some of the issues are more appropriately addressed during final design. The final environmental document text and/or Record of Decision will include appropriate commitments to addressing issues of concern to WMATA, including bus stop locations and pedestrian safety and accessibility.

Your preferences for direct access ramps to HOV lanes, and direct connections from HOV lanes to I-295 and I-95/I-495 are noted and will be taken into consideration during the process of developing the Preferred Alternative, which WMATA will be a part of.

Coordination will continue between the MD 210 study team and the Woodrow Wilson Bridge design team to ensure compatibility between both the highway and transit components of each project. At this time, no alternative that provides future rail in MD 210 corridor is being considered. However, access from MD 210 to potential Metro-rail station(s) in the I-95/I-495 corridor is a consideration in the MD 210 study.

This study has recognized the long-term need for increased park and ride lot parking space capacity to support growth in commuter bus ridership. The proposed 500+ space park and ride lot expansion near the MD 210/MD 373 intersection will provide substantial improvement

My telephone number is \_\_\_\_\_

Maryland Relay Service for Impaired Hearing or Speech  
1-800-735-2258 Statewide Toll Free

Mailing Address: P.O. Box 717 • Baltimore, MD 21203-0717  
707 North Calvert Street • Baltimore, Maryland 21202



August 1, 2001

Ms. Cynthia D. Simpson  
Deputy Director  
Office of Planning and Preliminary Engineering  
Malletop C-301  
Maryland State Highway Administration  
707 North Calvert Street  
Baltimore, Maryland 21202

RE: Project No. PG221 All  
MD 210 Multi-Modal Study  
I-95/I-495 to MD 228  
Prince George's County, Maryland

Dear Ms. Simpson:

We are writing to submit the Washington Metropolitan Area Transit Authority's (WMATA) comments on the Draft Environmental Impact Statement (DEIS) for the above-referenced project. As you know, the MD 210 corridor is a very successful transit corridor - WMATA alone carries approximately 2,500 passenger trips on the highway each day - and so the Authority is particularly interested in its future development.

Overall, the Authority strongly encourages the State Highway Administration (SHA) to preserve a preferential option for transit and ridesharing in this corridor. Given the levels of congestion forecast in this study, the region's ability to offer an attractive transit option in the corridor will be vital. A bus sitting in the same gridlock traffic as everyone's personal automobile will not be able to entice people out of their cars. For this reason, we take the position that whether the HOV lanes are concurrent-flow or barrier-separated is not nearly as important as whether the HOV lanes are there at all.

That being said, each HOV option does raise issues from the point of view of transit operations. The majority of these are items appropriately addressed during the design phase of the project. We have been working with SHA staff throughout the EIS process, and look forward to continuing to do so once the project enters final design. A commitment to addressing the issues listed below in cooperation with WMATA should be part of the Record of Decision.

**Bus Access to HOV Lanes**

In order to be effective, HOV lanes must provide relatively frequent access for buses and other vehicles. Slip ramps are helpful, but not ideal, because buses must

VI-171

Washington  
Metropolitan Area  
Transit Authority

600 Fifth Street, NW  
Washington, DC 20001  
202/962-1234

By Metrorail:  
Audley Square—Red Line  
Gallery Place Chateaufort—  
Red, Green and  
Yellow Lines

By Metrobus:  
Routes D1, D3, D6, PD,  
70, 71, 80, X2

A District of Columbia,  
Maryland and Virginia  
Transit Partnership

Mr. Richard F. Stevens, Director  
October 24, 2001  
Page Two

Ms. Cynthia D. Simpson  
Page 2

merge across many lanes of traffic to use them. Direct access via a ramp from an interchange overpass is generally preferable. Restricting direct access ramps to buses may alleviate safety concerns, although Virginia's experience with these ramps (which are open to buses and personal autos) in the I-66 corridor does not indicate a history of problems.

**Bus Stop Locations/Pedestrian Safety and Accessibility**

It is likely that the opening of HOV lanes would trigger reconfiguration of WMATA's current bus operations on MD 210. However, there will continue to be a need for buses to serve people living adjacent to or along the highway. Project design should ensure that buses may safely pull out of and back into traffic as required, and that people may safely and conveniently access and wait at these locations. Pedestrian walkways, signal actuation, accessible bus stops, and passenger shelters should all be included.

**Connections to I-495 and I-295**

Direct connections from the HOV lanes to and from I-95/I-495 (in both directions) and I-295 should be provided. The alternative, requiring vehicles in the HOV lanes to safely weave across three or four lanes of traffic to access the appropriate ramps, will sharply cut into travel time savings and would introduce a great deal of weaving at a crowded section of the highway.

**Impacts of design of possible future rail in I-95/I-495 Corridor**

As the project moves forward, design should proceed to accommodate future rail in the I-95/I-495 corridor. Planning for this project has advanced in order to allow for such coordination with the design of the new Woodrow Wilson Bridge. WMATA can provide further information about this project at the appropriate time.

**Funding for bus service**

Funding for bus service to be operated on the HOV lanes, as well as for parking capacity along the corridor, should be provided as an integral part of the project.

**Lane Capacity**

While the number of automobiles projected for the routes appears to be within the capacity of even one HOV lane, it is not clear that the many WMATA and MTA buses operating in the corridor are reflected in this number. Capacity analyses for HOV lanes should specifically take into account the number of buses expected to be operating on the facility, as well as any additional capacity they will require to accommodate merging or acceleration on grades. If a single concurrent-flow HOV lane is chosen, passing lanes on upgrades may be required.

to the available corridor parking capacity. However, based primarily on the excess capacity of park and ride lots in the MD 210 project area, the need for further parking capacity is generally focused south of the MD 210 project area and/or on the adjacent US 301/MD 5 corridor. The MD 210 study will continue coordination with other on-going projects in the region, such as the US 301/MD 5 Corridor study, to evaluate park and ride capacity enhancements to support increased ride sharing. In addition, SHA will work with WMATA and MTA to identify potential funding sources for HOV bus service recognizing that the primary responsibility for this would fall on the transit agencies.

Metropolitan Washington Council of Government-modeled projections of the 2020 HOV volumes were refined by the SHA Travel Forecasting Section to account for WMATA and MTA buses. Even with the enhanced express bus network assumed in the projections, the number of buses projected constitute a relatively small percentage of the HOV traffic in the peak hour and would not be expected to cause a capacity concern for a one-lane per direction concurrent flow HOV system without passing lanes.

We appreciate the specific comments regarding the DEIS that you provided. These are generally editorial comments and questions that will be addressed in the final environmental document. In particular, the final document will illuminate that HOV forecasts for MD 210 were made assuming HOV 3+, corresponding to an HOV requirement of at least three persons per vehicle. Consideration will be given to including person throughput data in the final document. Although person throughput data is an important evaluation criteria for the alternatives, the purpose of the project is to relieve existing and projected congestion in a manner sensitive to the natural environment and surrounding communities.

Thank you again for your comments. If you have any further questions please feel free to call Dennis Atkins, the project manager at 410-545-8548, or Heather Amick, the environmental manager at 410-545-8525. Both can be reached toll free at 1-800-548-5026.

Very truly yours,

Cynthia D. Simpson  
Deputy Director  
Office of Planning and  
Preliminary Engineering

By:   
Joseph Kresslein  
Assistant Division Chief  
Project Planning Division

VI-172

Mr. Richard F. Stevens, Director  
October 24, 2001  
Page Three

Ms. Cynthia D. Simpson  
Page 3

cc: Ms. Heather Amick, SHA-PPD  
~~Mr. Dennis Adams, SHA-PPD~~  
Ms. Caryn Brookman, FHWA  
Ms. Mary Huie, FHWA  
Mr. Joseph Kresslein, SHA-PPD  
Mr. Mark Lotz, W.T. Ballard Co.  
Ms. Melinda Peters, SHA-OHD

Specific Comments on the Report

- Page I-6: Since data for this project was first collected, WMATA has revised its service in the 210 corridor and experienced a significant increase in ridership. The Authority currently operates five lines on Route 210 south of I-495 (D13, D14, W15, W17, W19,) with a total daily ridership of approximately 2,200. Other routes operating on roadways parallel to Route 210 between Oxon Hill Road and 228 (P17, P18, P19, W13, W14) have an average weekday ridership of approximately 2,600.
- Page I-6: WMATA does not own the Fort Washington Park and Ride lot.
- Page I-7: The Subregion V Master Plan also recommends HOV lanes on MD 210.
- Page II-12: The first full sentence on this page does not make sense grammatically, and it is unclear what it is meant to say. In addition, the Branch Avenue Metrorail station opened in January, 2001.
- Pages II-14 and II-15: The description of the HOV alternatives should address whether or not the HOV requirement is for two or three persons in a car. In addition, the analysis should reflect how many people are expected to travel in the lane; this is more pertinent to the Purpose and Need than the number of vehicles traveling. The report should also break out person and automobile counts for the peak hour of travel; the HOV restrictions are only in effect during peak travel hours and directions, and this is the only time of day in which congestion is a concern. The purpose of the projects to develop a transportation system that moves people more efficiently and effectively in order to handle peaked demand; therefore, the analysis should focus on how many people are able to pass through the corridor during that period of demand under each alternative; the current report does not include, let alone highlight, that information.
- Pages II-5: Does the number of vehicles (and people, if they are reported) include buses and their passengers? This should be made clear.
- Page II-21: The reference to the Variable Pricing Study should be updated.
- Page II-36: It would be helpful to see a similar chart, showing peak hour person throughput at these locations.
- Page IV-15: The references to WMATA and MTA appear to have been switched in this section.
- Page IV-16: While travel time runs may not have done for the 901 Route, travel time savings for the length of the corridor were calculated and should be reported here.
- Page IV-15: should read, "Wilson Bridge Towers Apartments."
- Page IV-17: The WMATA service revisions referenced have been implemented.

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Ms. Cynthia D. Simpson  
Page 4

Once again, we appreciate the cooperation we have received from GHA staff and consultants in this effort to date, and look forward to working with your agency as this project moves forward to final design. If you have any questions about these comments, please call Kathleen Donodeo at 202-962-1034.

Sincerely,



Richard F. Stevens  
Director  
Office of Business Planning and Development

**Supplemental Response to specific comments:**

Page I-6: The FEIS document has incorporated the WMATA revised service note.

Page I-6: The FEIS has revised the ownership of the Fort Washington Park and Ride lot.

Page I-7: HOV is no longer being considered for this project therefore, the Sub-region V Master Plan HOV recommendation has not been included in the document.

Page II-12: The ungrammatical sentence on DEIS page II-12 has been removed in the FEIS.

Pages II-14 and II-15: The rationale for deciding on the SHA-Selected Alternative 5A Modified was based on analyses of the traffic operations, environmental impacts and public/agency input for each of the alternatives. Person-throughput was not a significant factor in the decision-making process, except that public comments indicated that they were quite aware that the HOV alternatives (5B and 5C) provided more, and in their view excessive capacity as compared to the non-HOV alternative. The public was overwhelmingly opposed to HOV because it would, in their view, induce further sprawl growth in Charles County and directly impact land adjacent to MD 210. SHA-Selected Alternative 5A Modified is forecast to provide satisfactory traffic operations through the design year 2020, thus meeting purpose and need, with lower cost and environmental impacts as compared the HOV alternatives.

Page II-15: The number of vehicles includes buses, vanpools and carpools.

Page II-21: The SHA Variable Pricing Study has been dropped for the MD 210 corridor and all references have been deleted from the FEIS.

Page II-36: See Pages II-14 and II-15 note.

Page IV-15: The references to MTA and WMATA have been reversed in the FEIS.

Page IV-16: The time travel savings for the corridor, from the Metropolitan Washington Council of Governments Regional Travel Demand Analysis Study January 21, 2000, has been incorporated into the FEIS.

Page IV-16: The Wilson Towers Apartments reference is correct.

Page IV-17: The WMATA service revisions statement in the DEIS has been revised for the FEIS.

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