

## **Tips for Residents on Giving Comments on Draft EIS on I-495 and I-270 plan**

**Background:** The Maryland Department of Transportation State Highway Administration (MDOT SHA) and the Federal Highway Administration (FHWA) issued a [draft I-495/I-270 expansion Environmental Impact Statement](#) (DEIS) on July 10, 2020 under the National Environmental Policy Act (NEPA). NEPA is a bedrock federal law that aims to ensure federal agencies consider potential environmental (physical, social, and biological) impacts and alternatives before making a decision on an infrastructure project. (This [one page fact sheet](#) summarizes the NEPA process.)

**Public comments are critical.** Public comments alert agencies to unmet problems and, if they remain unmet in the final EIS, lay the foundation for future legal and political action to protect communities, the environment, and taxpayers. The final EIS is currently expected in May 2021.

**MDOT is taking public comments until 11:59 pm on October 8th, 2020.**

**Who can comment?** Anyone concerned citizen can give comments. You do not need special expertise.

**How do I comment?** You can e-mail a written comment to [MLS-NEPA-P3@mdot.maryland.gov](mailto:MLS-NEPA-P3@mdot.maryland.gov).

You can attend [a virtual or in person public hearing by signing up here](#). **You will have 3 minutes to speak.**

**You can mail a comment to:**

Lisa B. Choplin, DBIA Director, I-495 & I-270 P3 Office  
Maryland Department of Transportation State Highway Administration, I-495  
& I-270 P3 Office  
707 North Calvert Street  
Mail Stop P-601  
Baltimore, MD 21201

For more information contact [495cabe@gmail.com](mailto:495cabe@gmail.com) or [transportation@mdsierra.org](mailto:transportation@mdsierra.org)

## Developing Spoken and Written Comments on the DEIS

General comments that an action, like expanding the Beltway, will have “significant environmental effects” will not help an agency make a better decision. It’s critical to explain the relevant causes and environmental effects.

We hope the following tips will help you develop more effective comments. Below is a suggested structure and list of how to give a comment.

### How to Give A Comment:

1. **Clearly introduce yourself**
  - a. Start with your name and where you live (and describe if you are close to the project).
  - b. It can also help to state your occupation or background, especially if you have relevant expertise (engineering, law, etc.)
  - c. Also say if you are authorized to speak on behalf of an organization.
  
2. **State clearly that you DO NOT support the project and “support a no-build option.”** Then you may choose one or more of the following points about the DEIS and feel free to elaborate or customize:
  - a. **“A preferred alternative should not be chosen until the true monetary and environmental costs are known.”**
  
  - b. **“MDOT SHA must evaluate additional alternatives for detailed study** including public transit, Transportation Demand Management telecommuting, that weren’t considered in depth.”
  
  - c. **“MDOT SHA’s mitigation measures were vague, insufficient, or altogether missing.”**

\*\*Background: You can say the above phrases marked in quotations word for word. Saying you **“support a no-build” and/or one or more of the quoted phrases is important.** “No-build” means that you don’t support any option being considered--which currently are [only different versions widening the Beltway and I-270](#). Any option that the administration is considering to address the “purpose and need” of the project of providing congestion relief is called an “alternative” because it is an alternative to not building anything. A preferred alternative is the option that will be chosen at the end of the NEPA process to put in the final contract-i.e. 4

private toll lanes in both directions which the administration has already started soliciting for but can't formally select until the NEPA process is over.

3. **Explain how the proposed expansion project will impact your life and loved ones**, particularly if you live near the proposed expansion you. [This is a list of some locations that would be impacted](#). To determine the impacts you should address, ask yourself the following questions:
  - a. Are you concerned that air pollution from the project will have an impact on your health? If so explain.
  - b. Do you attend or visit schools, community centers, parks, places of worship, etc. near the proposed expansion? How would that impact your future experience?
  - c. Do you rent or live in a property that could be impacted by the proposed expansion?
  - d. Do you live in a neighborhood that has already high levels of air pollution, noise pollution, and vehicle traffic? How would the expansion exacerbate these impacts?
  - e. Are there any cultural resources of significance to you that could be impacted from the project?
  - f. Do you live in an area with frequent flooding near the proposed project? How could additional stormwater runoff from the project affect you?
  - g. Have you asked for information at other public workshops during the NEPA project that you didn't get the information to?
  - h. Is the 90 day public comment period too short for you to understand the impact the project will have on you during COVID?
  - i. Are there alternatives [they dropped from consideration](#) that would have benefited your life? Would you be impacted by high tolls? Please explain.
4. **Select 1-3 bullets from an outline of [“key issues of concern”](#) to identify additional impacts** (time-permitting during the public hearing).

## **Five More Tips for Effective Comments.**

- Effective comments are clear, concise, relevant, solution-oriented and provide specific examples.
- Effective comments avoid general opinions. (They are not considered substantive.)
- Verbal comments at hearings should focus on the most important tips you make in your written testimony to fit in the 3-minute window.
- Written testimony and written comments can make more than one point.
- It helps if you can support your points by referring to the sections, chapters, page numbers, paragraphs and special studies in the DEIS that deal with your concerns.

## **Sample Details to Include**

- Factual errors or data issues that undermine basic assumptions
- Missing or confusing details on impacts on streams, streets, air quality, homes, communities, or other critical omissions.
- New information that could change the analysis and conclusions
- A substantially different alternative that meets the purpose and need statement but was not adequately considered.