

7 PUBLIC INVOLVEMENT AND AGENCY COORDINATION

Outreach to and engagement with the public, stakeholders and agencies has continued since the publication of the DEIS in July of 2020. The summary of outreach that occurred up to the publication of the DEIS is available in Chapter 7 of the DEIS and DEIS, Appendix P.

DEIS, Chapter 7: https://495-270-p3.com/wp-content/uploads/2020/11/2020-06-02_DEIS_07_PIA_Coordination.pdf

DEIS, Appendix P: https://495-270-p3.com/wp-content/uploads/2020/07/DEIS_AppP_PITR_web.pdf

This SDEIS chapter updates coordination from July 2020 through June of 2021, including:

- The public involvement efforts during the DEIS Comment Period, including specific outreach to environmental justice populations,
- Stakeholder and community engagement, and
- Agency coordination that has occurred related to NEPA, Permitting, Section 106 and Section 4(f) coordination.

7.1 Introduction

A comprehensive public involvement and agency coordination program has been conducted throughout the I-495 & I-270 Managed Lanes Study (Study). This chapter summarizes the outreach, engagement, and agency consultation that has occurred since publication of the Draft Environmental Impact Statement (DEIS) on July 10, 2020.

7.2 Public Involvement

7.2.1 DEIS Notice of Availability and Comment Period

The DEIS was published on July 10, 2020 and was made available on the I-495 & I-270 P3 Program webpage (<https://495-270-p3.com/deis/>) and on the US Environmental Protection Agency (EPA) EIS Database webpage. The DEIS comment period was 120-days, from July 10, 2020 to November 9, 2020.

Opportunities to comment on the DEIS were provided by the following ways:

- Oral testimony at one of the Public Hearings in the main hearing room
- Oral testimony to a court reporter at a Public Hearing in private in a separate room
- DEIS comment form at <https://495-270-p3.com/DEIS/>
- Email to MLS-NEPA-P3@mdot.maryland.gov
- Written comments on a comment form at a Public Hearing
- Letters to Lisa B. Choplin, DBIA, I-495 & I-270 P3 Program Director, I-495 & I-270 P3 Office, 707 North Calvert Street, Mail Stop P-601, Baltimore MD 21202

Four virtual or online hearings were held during the DEIS Comment Period on the following days:

- Tuesday, August 18, 2020
- Thursday, August 20, 2020

- Tuesday, August 25, 2020
- Thursday, September 3, 2020

Two in-person hearings were held during the DEIS Comment Period on:

- Tuesday, September 1, 2020
- Thursday, September 10, 2020

To provide persons without electronic access to view the DEIS in hard copy, MDOT SHA and FHWA employed innovative approaches due to widespread closures of many public facilities, including libraries, caused by the global, 2020 COVID-19 pandemic. Due to these closures of public facilities, temporary facilities to house the DEIS for public review were provided at eight community-based public library parking lot locations along the study corridors, as well as one location in Washington, D.C. Lobbies at six centrally-located post offices in Montgomery and Prince George's Counties were also used for DEIS viewing locations. Locations were available during the week and weekend days, with day and evening hours to provide adequate options for the public to view the documents. Lastly, six select MDOT SHA, Maryland Transportation Authority (MDTA), and Virginia Department of Transportation (VDOT) offices within or near the study area were also open to the public for viewing of the DEIS and Technical Reports. Each DEIS viewing location was compliant with the Americans with Disabilities Act (ADA) and equipped with required Personal Protective Equipment (PPE), including masks, hand sanitizers, and antibacterial cleaning solution. A strict safety protocol, in compliance with the State-mandated COVID-19 guidelines, was followed to ensure the safety of the public and MDOT SHA staff. A full list of the 21 DEIS viewing locations and hours when the location was open for viewing the documentation are included in **Table 7-1**.

Table 7-1: DEIS Viewing Locations

COUNTY		LOCATION	VIEWING TIMES
1	Prince George's	LARGO-KETTERING LIBRARY 9601 Capital Ln Largo, MD 20774	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
2	Prince George's	NEW CARROLLTON LIBRARY 7414 Riverdale Rd New Carrollton, MD 20784	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
3	Prince George's	GLENARDEN LIBRARY 8724 Glenarden Pkwy Glenarden, MD 20706	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
4	Prince George's	SPAULDINGS LIBRARY 5811 Old Silver Hill Rd District Heights, MD 20747	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
5	Prince George's	MDOT SHA D3 OFFICE 9300 Kenilworth Ave Greenbelt, MD 20770	Mon. – Fri. 11 AM – 7 PM Sat. & Sun. 12 PM – 5 PM
6	Prince George's	KENILWORTH POST OFFICE 6270 Kenilworth Ave Riverdale, MD 20737	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 12 PM
7	Prince George's	HAMPTON PARK POST OFFICE 9201 Edgeworth Dr. Capitol Heights, MD 20790	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 4 PM
8	Prince George's	LARGO POST OFFICE 9801 Apollo Dr.	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 3 PM

COUNTY		LOCATION	VIEWING TIMES
		Upper Marlboro, MD 20774	
9	Prince George's	TEMPLE HILLS POST OFFICE 4806 Saint Barnabas Rd. Temple Hills, MD 20748	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 2:30 PM
10	Montgomery	CHEVY CHASE LIBRARY 8005 Connecticut Ave Chevy Chase, MD 20815	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
11	Montgomery	DAVIS (N. BETHESDA) LIBRARY 6400 Democracy Blvd Bethesda, MD 20817	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
12	Montgomery	KENSINGTON PARK LIBRARY 4201 Knowles Ave Kensington, MD 20895	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
13	Montgomery	POTOMAC LIBRARY 10101 Glenolden Dr Potomac, MD 20854	Tues. & Thurs. 11 AM – 7 PM Sun. 12 PM – 5 PM
14	Montgomery	MDOT SHA GAITHERSBURG SHOP 502 Quince Orchard Rd Gaithersburg, MD 20878	Mon. – Fri. 11 AM – 7 PM Sat. & Sun. 12 PM – 5 PM
15	Montgomery	MDOT SHA MD 200 WEST OPERATIONS 16902 Crabbs Branch Way Rockville, MD 20855	Mon. – Fri. 11 AM – 7 PM Sat. & Sun. 12 PM – 5 PM
16	Montgomery	MDOT SHA FAIRLAND SHOP 12020 Plum Orchard Rd. Silver Spring, MD 20904	Mon. – Fri. 11 AM – 7 PM Sat. & Sun. 12 PM – 5 PM
17	Montgomery	MDOT SHA SILVER SPRING OFFICE 8537 Georgia Ave Silver Spring, MD 20904	Mon. – Fri. 11 AM – 7 PM Sat. & Sun. 12 PM – 5 PM
18	Montgomery	WEST LAKE POST OFFICE 10421 Motor City Dr Bethesda, MD 20817	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 1 PM
19	Montgomery	ROCKVILLE POST OFFICE 500 N. Washington St Rockville, MD 20850	Mon. – Fri. 9 AM – 5 PM Sat. 9 AM – 4 PM
20	Fairfax, VA	VDOT N. VA DISTRICT OFFICE 4975 Alliance Dr Fairfax, VA 22030	Mon. – Fri. 9 AM – 4 PM
21	Washington, DC*	SHEPHERD PARK LIBRARY 7420 Georgia Ave NW Washington, DC 20012	Mon. – Fri. 11 AM – 2 PM and 3 PM – 7 PM

Note: Documentation included approximately 150 Flyers, 20 Executive Summaries, Staff Reference sheets, Comment Forms, Sign-in sheets, and Brochures.

*Flash drive only (no other documentation)

The extensive and innovative efforts to provide opportunity for public comment on the DEIS was unprecedented in Maryland. MDOT SHA and FHWA successfully held four virtual public hearings, each lasting nine hours, to maximize the opportunity for participation throughout the day. The virtual public hearings were held on the following dates from 9 AM to 8 PM (including two short breaks):

- Tuesday, August 18, 2020;
- Thursday, August 20, 2020;
- Tuesday, August 25, 2020; and
- Thursday, September 3, 2020.

Approximately 400 people participated in the virtual public hearings.

Two, in-person public hearings were also held in early September 2020, each lasting nine hours, in full compliance with State-mandated COVID-19 guidelines to keep both the public and staff safe. In-person hearings included a live presentation repeated at the beginning of the morning, afternoon, and evening sessions. The in-person public hearings were held on the following dates from 12 PM to 9 PM (including one short break):

- Tuesday, September 1, 2020, at Homewood Suites by Hilton (9103 Basil Court, Largo, MD 20774); and
- Thursday, September 10, 2020, at Hilton Executive Meeting Center (1750 Rockville Pike Rockville, MD 20852).

A total of 22 people attended the in-person public hearings.

Each virtual and in-person hearing could be listened to live via phone to accommodate persons without access to a computer. The public and elected officials could register to provide verbal testimony during both the virtual and in-person hearings and had the option to provide voicemail testimony during any of the six public hearings. The virtual hearings held were live-streamed on YouTube with automatic closed captioning. For full transparency, the recorded testimony was transcribed and posted on the I-495 & I-270 P3 Program webpage (<https://495-270-p3.com/your-participation/past-public-outreach/>) along with the in-person public hearing testimony transcripts. Plain-text versions of the presentation script and display boards were also uploaded to the program website so that website visitors may use Google translate and/or text-to-voice programs for the visually impaired.

The MDOT SHA and FHWA granted a 30-day extension of the public comment period for the DEIS. A 90-day comment period was originally provided on the DEIS, twice the minimum time required by FHWA. Based on input from the public, community partners, stakeholders and local and federal officials, MDOT SHA supported extending the comment period to 120 days and made a formal request to FHWA, which has authority to grant any extension. FHWA approved the request, and comments on the DEIS were accepted until November 9, 2020.

7.2.2 Public Outreach with Environmental Justice (EJ) Populations

In addition to standard public notifications of the availability of the DEIS and notification of the Public Hearings and associated comment period, MDOT SHA implemented additional notification methods to encourage meaningful involvement by low-income and minority race/ethnicity populations, as well as other traditionally marginalized populations in review of the DEIS and participation in the Public Hearings. These efforts include the following:

- Mailed flyers in English, Spanish, Amharic, and French¹ flyers to approximately 200 affordable housing complexes, schools, and places of worship² in the study area. Emailed PDFs of these flyers to the organizations that have email addresses listed online. A cover letter was sent with both forms of distribution.
- Uploaded to the project website the DEIS Executive Summary translated into Spanish, Amharic, and French.
- Provided hard copies of the translated DEIS Executive Summary at the DEIS viewing locations.
- Spanish language advertisements in *El Tiempo Latino*, *Washington Hispanic*, and on eltiempo.com.
- Additional County outreach:
 - Montgomery County News press release;
 - Inclusion in Montgomery County Executive's weekly newsletter;
 - Inclusion in Montgomery County Department of Transportation bi-weekly newsletter and social media posts;
 - Distribution of flyer via Maryland-National Capital Park and Planning Commission (M-NCPPC) Prince George's County Planning email databases;
 - Planning Department listserv with approximately 19,200 email addresses;
 - Community Association listserv with approximately 700 email addresses;
 - Inclusion in Prince George's County social media posts; and
 - Coordination with Prince George's County Faith-Based Advisory Board to distribute information to their ministry listserv with approximately 70 email addresses.
- Additional translation of flyer to Simplified Chinese, Korean, Malayalam, Punjabi, Tagalog, and Yoruba, uploaded to the project website, and distribution of hard copies to groceries largely serving immigrant communities.
 - ALDI (Beltsville, Lanham)
 - Anarkali Bazar (Greenbelt)
 - Giant Food (Greenbelt, Largo, Marlow Heights)
 - Global International Grocery (Silver Spring)
 - Great Wall Supermarket (Rockville)
 - Jumbo Food International Supermarket (Temple Hills)
 - La Colonia International Supermarket (Camp Springs)
 - Las Americas Market (Rockville)
 - Latino Market Grocery (Gaithersburg)
 - Lidl (District Heights)
 - Periyar Asian Grocery (Landover Hills)
 - Safeway (Greenbelt)

¹ Spanish, French, and Amharic are the top primary languages of English for Speakers of Other Languages (ESOL) learners in both counties.

² Includes Environmental Justice (EJ)- area schools with above-average participation in the Free and Reduced-price Meals Program; places of worship in EJ areas; and all affordable-housing complexes within the study area.

- Save A Lot (Forestville)
- Shoppers (College Park, Forestville, Largo, New Carrollton)

Since the DEIS publication and in response to comments from the EPA, an EJ Working Group was established to support the EJ analysis and outreach efforts to be conducted for the Study moving forward. Agency members include FHWA, EPA, MDOT SHA, Maryland Department of Planning (MDP), Montgomery County Department of Transportation (MCDOT), M-NCPPC, and Prince George’s County Department of Public Works and Transportation (DPW&T). The goals of the EJ Working Group are to:

- Develop potential mitigation measures and identify additional outreach opportunities using federal, state, and local experience;
- Identify potential commitments to EJ/public health mitigation measures related to social/health vulnerability indicators; and
- Identify recommendations for additional engagement opportunities including Final Environmental Impact Statement (FEIS) notifications and post-NEPA outreach to communities.

Since the DEIS was published, two EJ Working Group meetings have occurred (**Table 7-2**).

Table 7-2: Environmental Justice Working Group Meetings

DATE	AGENDA ITEMS
March 2, 2021	Kick-off Meeting; introductions, goals
April 7, 2021	Data collection to support existing conditions discussion in EJ Analysis; Discussion on EJ Public Outreach Plan and future opportunities; Mitigation considerations
September 15, 2021	EJ Outreach and Engagement Plan Through SDEIS/FEIS/ROD

7.2.3 Other Community Meetings and Stakeholder Outreach Events

Engagement with communities, stakeholders and elected officials continued to occur after the DEIS was published in July 2020 (**Table 7-3**). All meetings except for one were held virtually due to the COVID-19 Pandemic. The focus of this engagement was to better understand comments received on the DEIS, provide Study related updates, and seek feedback on a host of topics including effects of COVID-19 on traffic, transit opportunities, alternatives design, managed lanes access, bicycle and pedestrian improvements, economic benefits and environmental concerns. MDOT SHA continued engaging with stakeholder working groups that were either initiated before the DEIS or developed after including the Transit Working Group, Regional Economic Working Group, and Environmental Justice Working Group, as discussed above. In February 2021, MDOT SHA reinitiated meetings, held virtually, with several Homeowners’ Associations (HOAs) and Community Associations. Active engagement with stakeholders, communities, and elected official will continue to occur as the Study progresses. On April 6, 2021, an e-mail blast was sent to more than 600 e-mail addresses compiled from the Montgomery County Mailing List Generator for Homeowners Associations, Citizens and Civic Associations. HOA and CA leaders along the project corridor were invited to schedule a project briefing by the project team for their community. Ten groups responded, seven briefings were scheduled and held, and three briefings are planned for later in the year. In addition, MDOT SHA has held over 40 meetings with elected officials.

Table 7-3: Stakeholder and Community Meetings

DATE	ORGANIZATION
July 9, 2020	Northern Virginia Transportation Alliance
July 20, 2020	Montgomery County Council Transportation & Environment Committee Briefing
July 21, 2020	Greater Washington Partnership
September 3, 2020	Stakeholder Group Briefing (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
September 14, 2020	Montgomery County Department of Transportation
September 15, 2020	Prince George's County Department of Public Works and Transportation
September 22, 2020	Prince George's County Council Briefing
October 5, 2020	Virginia Department of Transportation 495 NEXT Project Public Hearing
October 6, 2020	Frederick County Department of Transportation
October 8, 2020	Virginia Department of Transportation 495 NEXT Project Public Hearing (in-person)
October 26, 2020	Montgomery County Council Transportation and Environment Committee
November 6, 2020	Disadvantaged Business Enterprise Opportunity MDOT Networking Event
November 10, 2020	Northern Virginia Transportation Alliance "What You Need to Know About Transportation" Seminar
November 16, 2020	Upcounty Citizens Advisory Board Land Use Committee
November 18, 2020	Greater Washington Partnership Capital Region Transportation Forum
November 20, 2020	Frederick County Department of Transportation
November 20, 2020	Stakeholder Group Update (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
December 1, 2020	Great Seneca Science Corridor IAC
December 4, 2020	Maryland Transportation Builders and Materials Association Together for Transportation Coalition
December 9, 2020	Montgomery County Business Roundtable
December 18, 2020	Stakeholder Group Update (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
January 15, 2021	Stakeholder Group Update (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
January 19, 2021	Northern Virginia Transportation Alliance/Suburban Maryland Transportation Alliance Joint Briefing
January 19, 2021	MDOT Office of Small Business Policy Small Business Enterprise Outreach Event
January 26, 2021	Transit Work Group
February 3, 2021	Regional Economic Work Group
February 4, 2021	Laborers International Union of North America
February 8, 2021	Montgomery County Economic Development Corporation
February 10, 2021	Leadership Montgomery

DATE	ORGANIZATION
February 12, 2021	Asian American Chamber of Commerce
February 19, 2021	Stakeholder Group Update (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
February 19, 2021	Montgomery County Department of Transportation Office of Small and Minority SBE Outreach
February 24, 2021	Regency Estates Civic Association
February 24, 2021	Conference of Minority Transportation Officials
February 25, 2021	Lantian Development
March 1, 2021	Washington Biologists' Field Club (WBFC)
March 12, 2021	ASHE Potomac Chapter
March 19, 2021	Hispanic Chamber of Commerce of Montgomery County
March 30, 2021	Peterson Companies
March 31, 2021	Regional Economic Work Group
April 14, 2021	Frederick County Chamber Transportation Advisory Committee
April 16, 2021	Stakeholder Group Update (Suburban Maryland Transportation Alliance, Northern Virginia Transportation Alliance, AAA Mid-Atlantic, Chambers of Commerce, Greater Washington Board of Trade, Maryland Transportation Builders and Materials Association)
April 20, 2021	Montgomery County Civic Federation
April 26, 2021	ITE Annual Meeting
April 29, 2021	George Mason University P3 Panel
April 30, 2021	Rubenstein Partners
May 6, 2021	Opportunity MDOT Stakeholders Meeting
May 11, 2021	Avonglen HOA
May 20, 2021	Rosemont Citizens Association
May 25, 2021	Maplewood Park HOA
May 26, 2021	Regional Economic Work Group Steering Committee
June 2, 2021	North Potomac Citizens Association
June 2, 2021	Friends of Moses Hall Cemetery and First Agape AME Zion Church Stakeholder Group
June 8, 2021	Luxmanor Citizens Association
June 10, 2021	Joint Briefing for Budget Committee Staff
June 11, 2021	Leadership Montgomery
June 15, 2021	Rock Creek Conservancy Advocacy Committee
June 24, 2021	Regional Economic Work Group
July 22, 2021	Hispanic Chamber of Commerce of Montgomery County
August 3, 2021	Frederick County Department of Transportation
August 13, 2021	Frederick Keys Baseball Game (Pop-up Event with informational booth)
August 18, 2021	Shady Grove Farmers Market (Pop-up Event with informational booth)
August 28, 2021	Derwood Farmers Market (Pop-up Event with informational booth)
September 4, 2021	Rockville Arts Festival (Pop-up Event with informational booth)

Note: All meetings held virtually unless otherwise denoted.

7.2.4 SDEIS Comment Period and Public Hearing

FHWA and MDOT SHA invite interested elected officials, state and local governments, other Federal agencies, Native American tribal governments, organizations, and members of the public to provide comments on the SDEIS.

The public comment period opens on October 1, 2021 and will continue until November 15, 2021. *Written and oral comments will be given equal consideration*, and FHWA will review all comments, and consider and respond to all substantive comments received or postmarked by that date in the preparation of the FEIS. Comments received or postmarked after that date will be reviewed and considered to the extent practicable. Comments on the SDEIS may be made by:

- Oral testimony at the Virtual Public Hearing, on November 1, 2021
- SDEIS comment form at oplanesmd.com/SDEIS
- Email to MLS-NEPA-P3@mdot.maryland.gov
- Letters to Jeff Folden, I-495 & I-270 P3 Program Deputy Director, I-495 & I-270 P3 Office, 707 North Calvert Street, Mail Stop P-601, Baltimore MD 21202
- Call-in a comment at 855-432-1483 and leave a voicemail that is limited to three minutes

The SDEIS Virtual Public Hearing will be held on November 1, 2021 with two sessions to provide the public an opportunity to provide live oral testimony on the SDEIS. Session 1 is from 2 PM to 4 PM and Session 2 is from 6 PM to 8 PM. Individuals are required to register in advance to be admitted to the phone queue for comment. Registration is available at oplanesmd.com/SDEIS or by calling 855-432-1483. Instructions will be emailed to registered individuals with their approved session time prior to the hearings.

At the start of each session, the Hearing Officer will give a brief presentation which includes the purpose of the hearing, ground rules of the hearing, how to comment on the SDEIS, and instructions on how to testify. He will also explain Title VI, on behalf of MDOT SHA. Responses to questions will not be given at the hearing; responses to comments will be provided in the FEIS.

In addition to verbal public testimony, stakeholders may provide one-on-one testimony during the call-in hearing sessions by calling 855-432-1483 and leaving a single voicemail message limited to three minutes. The public can listen live to the hearing sessions via telephone by calling 855-432-1483 or livestream at oplanesmd.com/SDEIS. After the hearing, transcripts will be available on the website.

The SDEIS document, supporting appendices, hearing materials, information displays, and interactive digital mapping will be available on the Program website oplanesmd.com/SDEIS beginning Friday, October 1, 2021.

7.3 Agency and Stakeholder Coordination

The FHWA and MDOT SHA actively engaged the Federal, state, regional, and local agencies, as well as the adjacent counties, Metropolitan Planning Organizations (MPO), and other agency stakeholders throughout the Study process, simultaneously with other public involvement efforts. Additional detail on agency coordination conducted up to DEIS publication is available in **DEIS, Chapter 7** (https://495-270-p3.com/wp-content/uploads/2020/11/2020-06-02_DEIS_07_PIA_Coordination.pdf) and **DEIS, Appendix P** (https://495-270-p3.com/wp-content/uploads/2020/07/DEIS_AppP_PITR_web.pdf).

Since the DEIS was published in July 2020, MDOT SHA has continued to meet with FHWA, as the Lead Federal Agency, the Cooperating Agencies and other state and local agencies and stakeholders. The meetings are listed in **Table 7-4** and focused on discussing individual agencies' and stakeholders' DEIS comments and working towards a resolution of critical study topics. Other ongoing agency involvement collaboration and consultation has included: Section 106 Consulting Parties meetings, Executive Steering Committee meetings, and the establishment of the Environmental Justice Working Group. MDOT SHA continues to address DEIS comments and further minimized the limits of disturbance based in part on agency coordination. Areas of substantial resource avoidance or minimization include the American Legion Bridge area where impacts have been reduced by over fifty percent since the DEIS; the Morningstar Tabernacle No. 88 Moses Hall and Cemetery where design refinements resulted in complete avoidance; and M-NCPPC parkland where MDOT SHA continues to address location specific comments and outfall stabilization. These avoidance and minimization efforts were based on the extensive agency coordination as detailed in **Table 7-4** through **Table 7-8**. Another focus area for avoidance and minimization was located adjacent to the I-495 inner loop just south of Cabin John Parkway.

Table 7-4: Agency & Stakeholder Coordination Meetings Post-DEIS Publication

DATE	PURPOSE	AGENCIES AND/OR STAKEHOLDERS REPRESENTED
August 3, 2020	Stream Mitigation Calculator Coordination	US Army Corps of Engineers (USACE) and Maryland Department of the Environment (MDE)
August 6, 2020	Water and Science Administration Working Meeting	MDE
August 17, 2020	Park Impacts and Mitigation Meeting	M-NCPPC Montgomery County
September 3, 2020	Wetland Mitigation Meeting	National Park Service (NPS) and FHWA
September 21, 2020	Park Impacts and Mitigation Meeting	M-NCPPC Montgomery County
September 28, 2020	Park Impacts and Mitigation Meeting	M-NCPPC Prince George's County
September 29, 2020	Informal Section 7 Consultation	US Fish and Wildlife Service (USFWS), FHWA, and Maryland Department of Natural Resources (MDNR)
October 5, 2020	Wetland Mitigation Meeting	NPS
October 20, 2020	Park Impacts and Mitigation Meeting	M-NCPPC Montgomery County
October 20, 2020	Bicycle and Pedestrian Improvements Coordination Meeting	M-NCPPC Prince George's County and Prince George's County DPW&T
November 2, 2020	Right-of-Way Coordination Meeting	M-NCPPC Montgomery County
November 23, 2020	Permitting Strategy Meeting	FHWA, USACE, MDE, and EPA
December 1, 2020	Biweekly FHWA Coordination Meeting	FHWA
December 1, 2020	Northwest Branch Stormwater Management Meeting	M-NCPPC Montgomery County
December 2, 2020	Permitting Strategy Meeting	USACE, MDE, EPA, and FHWA
December 8, 2020	Plummers Island Avoidance and Minimization Efforts Meeting	NPS, MDNR, USFWS, MDE, USACE, and FHWA
December 11, 2020	Bicycle and Pedestrian Improvements Coordination Meeting	M-NCPPC Montgomery County and Montgomery County Department of Transportation (DOT)
December 11, 2020	Culvert Field Meeting	EPA, MDE, USACE and FHWA
December 14, 2020	DEIS Comments Review Meeting	NPS and FHWA
December 15, 2020	Reoccurring FHWA Coordination Meeting	FHWA
December 17, 2020	Permitting Strategy Meeting	FHWA, USACE, MDE, and EPA
January 12, 2021	Reoccurring FHWA Coordination Meeting	FHWA

DATE	PURPOSE	AGENCIES AND/OR STAKEHOLDERS REPRESENTED
January 19, 2021	Issue Resolution Kick-off Meeting	M-NCPPC Montgomery and Prince George's County
January 20, 2021	Northwest Branch Stormwater Management Meeting	M-NCPPC Montgomery County
February 1, 2021	Collaborative Leadership Summit	FHWA, USACE, EPA, NPS, National Park and Planning Commission (NCPC), USFWS, US Postal Service (USPS), National Oceanic and Atmospheric Administration National Marine Fisheries Service (NOAA NMFS), US NAVY, MDNR, MDE, M-NCPPC, VDOT, Maryland Historical Trust (MHT), MDP, MDTA, Maryland Transit Authority (MTA), MC DOT, and PG DW&T
February 3, 2021	DEIS Comments Review Meeting	NCPC and FHWA
February 3, 2021	Reoccurring FHWA Coordination Meeting	FHWA
February 8, 2021	American Legion Bridge and Baltimore-Washington Parkway Impacts Coordination Meeting	NPS and FHWA
February 9, 2021	MLS and I-495 NEXT Coordination Meeting	VDOT
February 9, 2021	DEIS Comments Review Meeting	MDNR and FHWA
February 10, 2021	DEIS Comments Review Meeting	USACE, MDE, and FHWA
February 11, 2021	Reoccurring FHWA Coordination Meeting	FHWA
February 18, 2021	DEIS Comments Review Meeting	EPA and FHWA
February 25, 2021	Executive Steering Committee	FHWA, USACE, US Department of Agriculture (USDA), EPA, NPS, NCPC, USFWS, USPS, NOAA NMFS, US Navy, US Airforce Joint Base Andrews (JBA), MDNR, MDE, M-NCPPC, VDOT, MHT, MDP, MDTA, MTA, MC DOT, and PG DPW&T
February 26, 2021	Carderock and Bethesda Property Impacts Meeting	US Navy and FHWA
March 2, 2021	Reoccurring FHWA Coordination Meeting	FHWA
March 4, 2021	American Legion Bridge, Baltimore-Washington Parkway, and George Washington Memorial Parkway Impacts Coordination Meeting	NPS and FHWA
March 10, 2021	DEIS Comments Review and Stormwater Management Meeting	M-NCPPC Montgomery County
March 15, 2021	DEIS Comments Review Meeting	M-NCPPC Montgomery County
March 17, 2021	Reoccurring FHWA Coordination Meeting	FHWA
March 19, 2021	Stormwater Management Meeting	M-NCPPC Prince George's County
March 24, 2021	DEIS Comments Review and Stormwater Management Meeting	M-NCPPC Prince George's County
April 1, 2021	Transportation Use and Property Boundary Meeting	NPS and FHWA
April 6, 2021	American Legion Bridge and Resources Update Meeting	USACE and MDE
April 6, 2021	Reoccurring FHWA Coordination Meeting	FHWA

DATE	PURPOSE	AGENCIES AND/OR STAKEHOLDERS REPRESENTED
April 9, 2021	DEIS Comments Review and Stormwater Management Meeting	M-NCPPC Prince George's County
April 12, 2021	Rock Creek DEIS Comments Review Meeting	M-NCPPC Montgomery County
April 13, 2021	Stormwater Management Site Meeting	M-NCPPC Montgomery County
May 4, 2021	Reoccurring FHWA Coordination Meeting	FHWA
May 12, 2021	Phase 1 South Park Impacts and Mitigation Meeting	M-NCPPC Montgomery County
May 18, 2021	SDEIS Air and Noise Coordination Meeting	FHWA
May 26, 2021	Executive Steering Committee	FHWA, USACE, EPA, NPS, NCPC, USFWS, USPS NOAA NMFS, US Navy, JBA, MDNR, MDE, M-NCPPC, VDOT, MHT, MDP, MDTA, MC DOT, and PG DPW&T
June 1, 2021	Reoccurring FHWA Coordination Meeting	FHWA
June 2, 2021	Mosses Hall Cemetery and First Agape AME Zion Church Bicycle and Pedestrian Connection on Seven Locks Road Meeting	First Agape AME Zion Church at Gibson Grove, Friends of Moses Hall, M-NCPPC Montgomery County, MCDOT, and FHWA
June 8, 2021	Air Quality Conformity Determination Meeting	FHWA
June 10, 2021	Compensatory Stormwater Management Plan Meeting	FHWA
June 21, 2021	Park Impacts and Mitigation Meeting	NPS and FHWA
June 21, 2021	American Legion Bridge Trail Connection Meeting	M-NCPPC, MCDOT, NPS, and FHWA
June 21, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT
June 23, 2021	Transportation Use and Property Boundary Meeting	NPS and FHWA
June 30, 2021	Transportation Use and Property Boundary Meeting	NPS and FHWA
July 7, 2021	Air Quality Conformity	FHWA
July 8, 2021	Transportation Use and Property Boundary Meeting	NPS and FHWA
July 12, 2021	Park Impacts	NCPC, NPS, FHWA
July 13, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT
July 14, 2021	NPS Parkland Impacts	FHWA
July 20, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT
July 27, 2021	NEPA and Section 106 Process	FHWA
August 3, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT
August 9, 2021	Air Quality and Environmental Justice Meeting	FHWA
August 16, 2021	SDEIS Comments	FHWA
August 17, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT

DATE	PURPOSE	AGENCIES AND/OR STAKEHOLDERS REPRESENTED
August 18, 2021	Highway Deed Easement Process with NPS and SDEIS Comments	FHWA
August 18, 2021	Reoccurring FHWA Coordination Meeting	FHWA
August 23, 2021	I-495 NEXT and MLS Coordination Meeting	VDOT and Fairfax County Department of Transportation
August 25, 2021	SDEIS Comments	
August 26, 2021	Air Quality SDEIS Comments	FHWA
August 30, 2021	SDEIS Comments	FHWA
August 31, 2021	Maryland and Virginia 495 Interface Technical Coordination	VDOT
September 1, 2021	Review of Common SDEIS Comments	FHWA, NPS, USACE, EPA, NCPC, MDE, M-NCPPC, MCDOT
September 7, 2021	Reoccurring FHWA Coordination Meeting	FHWA

Note: All meetings held virtually unless otherwise denoted.

Since the DEIS was published in July 2020, MDOT SHA held three virtual Interagency Agency Working Group (IAWG) meetings with members from 27 Cooperating and Participating Agencies. The focus of the IAWG meetings was to provide Study updates, present common DEIS comment themes, discuss proposed responses to common comments, discuss ongoing public and agency collaboration, present avoidance and minimization measures, and to identify the recommended preferred alternative, present justification for recommending the alternative and to listen to feedback on the alternative (**Table 7-5**).

Table 7-5: IAWG Meetings Post-DEIS Publication

DATE	IAWG MEETING #	PURPOSE	AGENCIES REPRESENTED
January 27, 2021	13	Provide MLS Study Update, Review Summary of DEIS Comments, Announce Recommended Preferred Alternative and Associated Commitments, and a New Agency and Stakeholder Collaboration Process	Advisory Council on Historic Preservation (ACHP), EPA, FHWA, USFWS, MDE, MDNR, MDOT MTA, MDP, MDTA, MHT, M-NCPPC, MC DOT, Metropolitan Washington Council of Governments (MWCOG), US Navy, NCPC, National Institute of Standards and Technology (NIST), NPS, PG DPW&T, USACE, USPS, and VDOT
February 17, 2021	14	Provide Update on Agency and Stakeholder Collaboration Efforts, Design Efforts to address common DEIS Comments, Review Recommended Preferred alternative	ACHP, EPA, FHWA, USFWS, MDE, MDNR, MDOT MTA, MDP, MHT, M-NCPPC, MC DOT, MWCOG, US Navy, NCPC, NIST, NPS, PG DPW&T, USACE, USDA, USDA, USPS, VDOT, JBA
May 12, 2021	15	Provide MLS Update, Announce a New Recommended Preferred Alternative based off of Agency and Public Feedback, Announce this SDIES, and Provide an Updated MLS Schedule	ACHP, EPA, FHWA, USFWS, MDE, MDNR, MDOT MTA, MDOT MDTA, MHT, M-NCPPC, MC DOT, MWCOG, US Navy, NIST, PG DPW&T, USACE, USDA, USPS, VDOT, JBA

MDOT SHA also met with the City of Rockville and City of Gaithersburg to discuss DEIS comments, property impacts, proposed stormwater management, parkland impacts and mitigation, bicycle and pedestrian improvements, traffic and structure design within the applicable City's limits (**Table 7-6**).

Table 7-6: City of Rockville and City of Gaithersburg Meetings Post-DEIS Publication

DATE	MEETING
March 19, 2021	City of Rockville Coordination Meeting
April 14, 2021	City of Rockville Stormwater Management Coordination Meeting
April 29, 2021	City of Rockville Parkland and Mitigation Meeting
July 22, 2021	City of Gaithersburg Parkland and Mitigation Meeting
September 2, 2021	City of Rockville Design, Traffic, and Mitigation Meeting

7.3.1 Natural Resource Agency Coordination

The regulatory and permitting process was conducted concurrently with NEPA and required agency consultation with the goal of gaining approval for a USACE Individual Section 404 Permit; MDE Wetlands and Waterways Permit; USFWS ESA Section 7; and MDE 401 Water Quality Certification. These approvals required meetings for the following purposes:

- Jurisdictional Determination;
- Permitting strategy;
- Avoidance, minimization, and mitigation;
- Wetland delineation; and
- Rare, Threatened, and Endangered Species coordination.

Table 7-7 summarizes the meeting held since July 2020.

Table 7-7: Natural Resource Related Meetings

DATE	AGENCIES	GENERAL TOPICS COVERED
July 9, 2020	MDE and USACE	Discussion of the logistics of the MLS Joint Public Hearings, both virtual and in-person, for 404/401 purposes
July 21, 2020	DNR	Review Additional Potential Fish Blockages noted by MDE and USFWS Upstream and Downstream of the Paint Branch Fish Passage Site (AN-6)
July 22, 2020	M-NCPPC Montgomery County	Montgomery County M-NCPPC Comments on the Tributary to Seneca Creek Site (CA-5) Concept Design
July 24, 2020	Washington Suburban Sanitary Commission (WSSC)	Logistics for Proposed Mitigation Site Work Over WSSC Sewer and Water Lines.
August 12, 2020	M-NCPPC Montgomery County	Montgomery County M-NCPPC & WSSC Comments on the Crabbs Branch Site (AN-1) 404 Mitigation Concept Design
August 12, 2020	USACE	Discussion of new regulatory definition of Waters of the US and any implications on the Jurisdictional Determination
August 27, 2020	MDE	Discussion of impacts within the MDE Tier II boundary and the Tier II package requirements
September 3, 2020	NPS	Discussion of the Statement of Findings requirement as it pertains to MLS and path forward for coordination meetings.

DATE	AGENCIES	GENERAL TOPICS COVERED
September 4, 2020	USACE and MDE	Discussion with the regulatory agencies about how to apply the MSMF stream calculator and which stream assessments to use.
September 29, 2020	M-NCPPC Montgomery County	404 Mitigation Magruder Branch (CA-2/3) Site Preliminary Design
September 29, 2020	FHWA	Culvert and permitting
September 29, 2020	USACE and MDE	Provide project updates and receive updates from the regulatory agencies related to MLS permitting.
September 29, 2020	DNR and USFWS	MLS Informal Section 7 Consultation – 2020 Bat Survey Results
October 5, 2020	NPS	Wetland Mitigation Meeting for CHOH and GWMP
October 14, 2020	NPS	Wetland Mitigation for NPS National Capital Parks- East
October 15, 2020	FHWA, USACE, and MDE	Permitting
October 16, 2020	MDE, USACE, DNR, and EPA	404 Mitigation Magruder Branch (CA-2/3) and Pebblestone Dr. Tributary Preliminary Designs
October 29, 2020	USACE and MDE	404 Permitting Update Meeting
November 9, 2020	FHWA, USACE, and MDE	Permitting
November 12, 2020	USACE and MDE	404 Permitting Update Meeting
November 18, 2020	M-NCPPC Montgomery County	Stormwater Field Meeting
November 19, 2020	USACE and MDE	Stream Assessment Field Meeting
November 19, 2020	MDE and USACE	404 Mitigation Magruder Branch (CA-2/3) Wetland Delineation Field Review
November 24, 2020	USACE and MDE	Permitting
December 1, 2020	M-NCPPC Montgomery County	Stormwater Field Meeting
December 2, 2020	M-NCPPC Prince George's County	ROE Agreement Extension
December 8, 2020	USACE, MDE, FHWA, DNR, USFWS, and NPS	Plummers Island Coordination
December 10, 2020	USACE and MDE	404 Permitting Update Meeting
December 11, 2020	EPA, MDE, USACE, and FHWA	Culvert Field Meeting
December 14, 2020	EPA, FHWA, USACE, and MDE	Phased Permit Process
December 21, 2020	MDE and USACE	Culvert Field Meeting
January 7, 2021	USACE and MDE	404 Permitting Update Meeting
January 14, 2021	MDE and USACE	Seneca Creek Tributary (CA-5) and Crabbs Branch (AN-1) Wetland Delineation Field Reviews
January 19, 2021	MDE, USACE, and EPA	401 Water Quality Certification (WQC) Working Session
January 21, 2021	USACE and MDE	404 Permitting Update Meeting
January 22, 2021	MDE	404 Mitigation Henson Creek (RFP-5) and Mill Swamp Creek (RFP-6) Wetland Delineation Field Reviews
February 4, 2021	USACE and MDE	404 Permitting Update Meeting
February 16, 2021	USACE and MDE	A presentation to the regulatory agencies of how the Maryland Stream Mitigation Framework stream calculator is being applied to the MLS.
February 18, 2021	USACE and MDE	404 Permitting Update Meeting
February 22, 2021	MDE, USACE, and EPA	401 WQC Working Session
March 1, 2021	NPS	Washington Biologists Field Club Coordination Meeting
March 4, 2021	USACE and MDE	404 Permitting Update Meeting

DATE	AGENCIES	GENERAL TOPICS COVERED
March 9, 2021	MDE and USACE	Cabin Branch (RFP-2) and Pebblestone Dr. Tributary (AN-3) Wetland Delineation Field Reviews
March 18, 2021	USACE and MDE	404 Permitting Update Meeting
March 19, 2021	PEPCO	404 Mitigation Tributary to Seneca Creek (CA-5) Semi-Final Design
March 24, 2021	M-NCPPC Montgomery County, MDE, and USACE	404 Mitigation Tributary to Seneca Creek (CA-5) Semi-Final Design
April 1, 2021	MDE and USACE	404 Mitigation Indian Creek and Tributaries at Konterra (RFP-1) Wetland Delineation Field Review
April 9, 2021	MDOT SHA Plan Review Division (PRD)	404 Mitigation PRD Comments on the Magruder Branch (CA-2/3) Site Development Submittal
April 16, 2021	MDE and USACE	404 Mitigation Indian Creek and Tributaries at Konterra (RFP-1) Wetland Delineation Field Review
April 22, 2021	MDE and USACE	404 Permitting Update Meeting
May 6, 2021	M-NCPPC Montgomery County, MDE, and USACE	404 Mitigation Magruder Branch (CA-2/3) Semi-Final Design
May 20, 2021	MDE and USACE	404 Permitting Update Meeting
June 15, 2021	MDE and USACE	Discussion of impact presentation in JPA and NEPA Documents
June 25, 2021	MDE and USACE	Compensatory SWM Site Wetlands & Waterways Delineation Field Review
June 30, 2021	DNR	Mussel Survey
June 30, 2021	M-NCPPC Montgomery County, MDE, and USACE	404 Mitigation Tributary to Seneca Creek (CA-5) Semi-Final Field Meeting
July 1, 2021	MDE and USACE	404 Permitting Update Meeting
July 12, 2021	M-NCPPC Montgomery County and MDE	404 Mitigation M-NCPPC Comments on the Magruder Branch (CA-2/3) Semi-Final Design
July 15, 2021	MDE and USACE	404 Permitting Update Meeting
July 23, 2021	DNR	Rare, Threatened, and Endangered Species and Boring Locations
August 4, 2021	MDE and USACE	LOD Review Meeting
August 19, 2021	USACE	Change in Jurisdiction for Navigable Waters Protection Rule
August 26, 2021	MDE and USACE	404 Permitting Update Meeting
September 7, 2021	M-NCPPC Montgomery County	4(f) Mitigation Cabin John Creek Field Meeting
September 9, 2021	MDE and USACE	404 Permitting Update Meeting

7.3.2 Section 106 Consultation

Agency and interested parties consultation is being conducted in accordance with Section 106 of the National Historic Preservation Act of 1966 that considers the effects of the proposed action on historic properties. FHWA and MDOT SHA notified the agencies and other consulting parties of an update to the undertaking's Area of Potential Effects (APE), new architectural eligibility determinations, and effects assessments on July 23, 2020. The agencies and other consulting parties received archaeological reports documenting archaeological and architectural survey and evaluation efforts for stream and wetland mitigation areas identified by the Study, as added to the APE in July 2020, as well as determination of eligibility forms for architectural resources associated with the proposed off-site wetlands and water quality mitigation sites on February 11, 2021.

The FHWA and MDOT SHA held a fourth consulting parties' meeting virtually on March 10, 2021. A draft Programmatic Agreement was distributed for review and comment to the consulting parties on March 10, 2021 with the comment period ending April 12, 2021. MDOT SHA has continued to coordinate with individuals consulting parties through informal meetings, email and other means as impacts to specific resources are evaluated. MDOT SHA has conducted additional field work at the Moses Hall Cemetery, and closely coordinated this effort with key consulting parties including the Friends of Moses Hall, the trustees of the property, and the First Agape AME Zion Church at Gibson Grove. A draft report documenting the fieldwork effort at Moses Hall Cemetery, with additional information on the Gibson Grove AME Zion Church was provided to consulting parties for comment on May 27, 2021.

On September 8, 2021, MDOT SHA provided additional consultation materials including: additional Ground Penetrating Radar results at the Morningstar Tabernacle No. 88 Moses Hall and Cemetery, a revision to the APE to reflect the Phase 1 South limits including avoidance and minimization measures, archaeological and historic architectural assessments of the proposed stormwater mitigation locations, new determinations of eligibility, and revised effect determinations to reflect the reduced APE based on the Phase 1 South limits. Additionally, a comment from VDHR was addressed to revise the effect determination on one archaeological site in Virginia. Concurrence was requested from MHT on the eligibility determinations and revised effect determinations, in accordance with each agency's jurisdictional authority.

The FHWA and MDOT SHA have also held separate meetings with consulting parties to discuss avoidance, minimization, and mitigation efforts on adversely affected historic properties within the APE (**Table 7-8**). Note that Section 106 public involvement is being fulfilled through the same processes used for general public involvement and NEPA compliance.

Table 7-8: Section 106 Consultation Meetings Post-DEIS Publication

DATE	ORGANIZATION
September 16, 2020	Friends of Moses Hall
November 10, 2020	Friends of Moses Hall
February 10, 2021	Friends of Moses Hall
March 10, 2021	Consulting Parties
April 6, 2021	First Agape AME Zion Church at Gibson Grove
May 5, 2021	Virginia Department of Historic Resources (VDHR), VDOT, and NPS
June 2, 2021	First Agape AME Zion Church at Gibson Grove, Friends of Moses Hall, M-NCPPC Montgomery County, MCDOT, and FHWA
September 8, 2021	First Agape AME Zion Church at Gibson Grove, Friends of Moses Hall, M-NCPPC Montgomery County, MCDOT, and FHWA

7.3.3 Section 4(f) Agency Coordination

Section 4(f) of the US Department of Transportation Act of 1966 mandates that use of a publicly-owned park, recreation area, wildlife/waterfowl refuge, or historic site for a transportation project cannot be approved unless there is no feasible and prudent alternative that avoids such use and all possible planning to minimize harm to Section 4(f) properties has been included in the project. In reaching the determination that no feasible and prudent avoidance alternative exists and all possible planning to minimize harm has been included in the project, Section 4(f) regulations require the Draft Section 4(f) Evaluation be made available for coordination and comment to officials with jurisdiction over the Section 4(f) resources. The Draft Section 4(f) Evaluation was available for review and comment with the DEIS comment period July 10 through November 9, 2020. The Draft Section 4(f) Evaluation is available on the project website: https://495-270-p3.com/wp-content/uploads/2020/07/DEIS_AppF_Draft-Section-4f-Eval_web.pdf.

Since July 2020, MDOT SHA has conducted conference calls, meetings, and field reviews with or sent letters to the following officials with jurisdiction over parkland along the study corridors: NPS, M-NCPPC Montgomery County, M-NCPPC Prince George's County, NCPC, City of Rockville, City of Gaithersburg, City of Greenbelt, City of New Carrollton, and Montgomery County Department of Education. FHWA and MDOT SHA have also held meetings and coordinated with the agencies with jurisdiction over historic sites, including NPS, the Advisory Council on Historic Preservation (ACHP), MHT, and VDHR. Through this extensive coordination, MDOT SHA has provided detailed explanations of the proposed project design and its associated impacts on Section 4(f) properties. MDOT SHA has also worked closely with the officials with jurisdiction to further reduce impacts and minimize harm to Section 4(f) properties. These minimization efforts are presented in **Chapter 5** of this SDEIS. Additionally, MDOT SHA has developed preliminary Section 4(f) mitigation opportunities and provided them to the officials with jurisdiction for feedback. Coordination with the officials with jurisdiction will continue, as needed, through the development of the Final Section 4(f) Evaluation and will focus on efforts to further reduce impacts and harm to Section 4(f) properties and the development of appropriate Section 4(f) mitigation and enhancement opportunities.

In addition to Officials with Jurisdiction, the Section 4(f) Evaluation must be made available to the US Department of the Interior (USDOI) and as needed, to the USDA and the Department of Housing and Urban Development (23 C.F.R. §774.5). The Draft Section 4(f) Evaluation was provided to USDOI for review in conjunction with the DEIS in July 2020. USDOI provided preliminary comments to MDOT SHA, but those comments did not represent the formal consultation of FHWA with USDOI, as required under 23 C.F.R. §774.5(a). USDOI will again be afforded the opportunity to review and provide comments on the Updated Draft Section 4(f) Evaluation in conjunction with the SDEIS (**Chapter 5** of this document). However, formal coordination with USDOI is not expected to occur until the Final Section 4(f) Evaluation in coordination with the FEIS as this will enable USDOI to provide comments on FHWA's conclusions regarding the existence of feasible and prudent avoidance alternatives, the inclusion of all possible planning to minimize harm to Section 4(f) properties (including mitigation), and the least overall harm alternative.

7.4 Incorporation of Public and Agency Input into the Study

Following the publication of the DEIS in July 2020, MDOT SHA has considered nearly 3,000 comments submitted via email, phone, online and hard copy comment forms, and public testimony. MDOT SHA communicated with many agencies, stakeholders, and members of the public to address their questions and concerns through the following efforts:

- Aligning the Preferred Alternative and permitting process with the phased delivery approach focusing on addressing the severe congestion at the American Legion Bridge as priority.
- Avoiding and significantly reducing property, community, historic, natural resource and parkland impacts.
- Avoiding all residential and business displacements.
- Avoiding all ground disturbance at the historic Morningstar Tabernacle No. 88 Moses Hall and Cemetery.
- Identifying appropriate on-site and off-site stormwater management to meet regulatory requirements and removing or relocating stormwater management facilities from sensitive resources including parks, where feasible.
- Monitoring and analyzing traffic impacts associated with the COVID-19 Pandemic to understand any impacts to the Study.
- Committing to priority bicycle, pedestrian, and transit improvements to increase multi-modal options for travel within the study corridors.
- Including toll-free travel under the Preferred Alternative for High Occupancy Vehicles with three (3) or more user, transit buses, carpool/vanpool and motorcyclists to reduce the reliance on single occupancy vehicles and provide equitable travel options.
- Removing the existing Collector-Distributor system on I-270 to largely stay within the existing roadway footprint on I-270 to avoid and minimize environmental and property impacts.

This effort was possible through the extensive agency and stakeholder coordination that occurred since publication of the DEIS in July 2020 including:

- Establishing Economic, Transit and Environmental Justice Working Groups
- Holding over 50 individual stakeholder Meetings with municipalities, non-governmental organizations, elected officials and communities.
- Holding over 60 resource and regulatory agency meetings to discuss DEIS comments, avoidance, minimization, and mitigation opportunities; and
- Holding over 40 field and office meetings with regulatory agencies to discuss natural resource impacts, stormwater management, culvert augmentation and permitting.