

T&E COMMITTEE #2
February 28, 2022

MEMORANDUM

February 23, 2022

TO: Transportation and Environment (T&E) Committee

FROM: Glenn Orlin, Senior Analyst

SUBJECT: Corridor Forward: The I-270 Transit Plan, and selection of transit project(s) to be funded with Opportunity Lanes toll revenue¹

PURPOSE: Worksession

Councilmembers: Please bring your copy of the Final Draft Plan to this worksession.

The purpose of this worksession is for Councilmembers to gain an understanding of the options developed by the Planning Board and its staff, to consider the public hearing testimony and Council staff's recommendations, and to engage in a discussion with staffs, including any requests for further information. At a second worksession on March 9—in combination with its worksession on Mass Transit projects in the Recommended FY23-28 Capital Improvements Program (CIP)—it is anticipated that the Committee will formulate its recommendations so that the full Council can take up this matter later in the month. As of this writing, the Council has yet to receive the Executive's Fiscal Impact Statement on this Plan.

Those anticipated to attend include:

Casey Anderson, Chair, Planning Board
Gwen Wright, Director, Planning Department
Carrie Sanders, Chief, Midcounty Planning, Planning Department
Jason Sartori, Chief, Countywide Planning, Planning Department
Jessica McVary, Master Planner/Supervisor, Midcounty Planning
Jesse Cohn McGowan, Project Manager, Countywide Planning
Christopher Conklin, Director, Department of Transportation (DOT)
Hannah Henn, Deputy Director for Transportation Policy, DOT
Andrew Bossi, Director's Office, DOT
Jonathan Parker, Planning Program Manager, Washington Metropolitan Area Transit Authority (WMATA)

¹ Key words: #CorridorForward, plus search terms I-270, transit, Metrorail, monorail, bus rapid transit, MARC

Options studied. After an initial screening of a larger number of options, the Planning staff winnowed the alternatives to five:

- Providing for both peak and off-peak bi-directional service on the MARC Brunswick Line by adding a third track along much of its length and adding master-planned stations at White Flint and Shady Grove.
- Constructing a monorail or light rail line from Shady Grove to the City of Frederick, mostly in the I-270 right-of-way except for diversions to Metropolitan Grove, Germantown Town Center, Clarksburg/COMSAT, Urbana, and Downtown Frederick.
- Constructing Phases 1 and 2 of the master-planned Corridor Cities Transitway (CCT) from Shady Grove to the Life Sciences area, Kentlands, Metropolitan Grove (Phase 1 terminus), Germantown Town Center and the former COMSAT site in Clarksburg (Phase 2 terminus).
- Enhancing commuter express bus service using the State’s proposed toll lanes and several direct ramps to and from them.
- Extending Metrorail’s Red Line from the Shady Grove Metro Station to the Germantown Town Center, with intermediate stops in Olde Towne Gaithersburg and at Quince Orchard Road.

The Planning Board treated the only other planned major expansion of transit in the I-270—the MD 355 Bus Rapid Transit (BRT) line between Bethesda and Clarksburg—as a given, presumably because it’s planning is well advanced. Phase 1 of the CCT is further along in its planning than the MD 355 BRT—its Environmental Assessment was completed five years ago. However, with no appreciable movement towards implementation over the past two decades, the Planning Board did not take it as a given.

After a review of these alternatives according to several metrics, the Planning Board is recommending:

- In the short term, construct the Veirs Mill Road and MD 355 BRT lines. This mirrors the County Executive’s proposal in the Recommended FY23-28 CIP, which would build the Veirs Mill Road BRT by FY27 and the center section of the MD 355 BRT by FY28. He also recommends complete design for the northern and southern segments of the MD 355 BRT in FY24, having them in position to compete for Federal construction funds.
- In the medium term, construct six “Corridor Connectors”: dedicated bus lanes on existing roads in the general vicinity of the CCT, either by adding lanes or repurposing them, depending on the circumstances. The portions of the master-planned CCT that are not part of one or more Corridor Connectors would be removed from the master plan.
- In the long term, extend Metrorail to the Germantown Town Center, as noted above.

Hearing testimony. The Council held its public hearing on the Plan on February 15, and as part of the hearing it also solicited input on what transit project(s) should be funded with Opportunity Lanes toll revenue. The most significant comments were these:

- The County Executive casts considerable doubt on the route, cost, and operational feasibility of the Red Line Extension and recommends removing it from the time frame of the Plan, although he stops short of ruling it out in the long term. He also believes that the I-270 express bus service should be an element of the Plan, that other existing routes as well as portions of the reserved CCT right-of-way be evaluated for dedicated bus lanes, that MARC improvements are

not sufficiently recognized for their regional importance, and that park-and-ride function has been largely ignored (©1-4). The Executive appended WMATA's comments to the Planning Board, which suggest that BRT and improved MARC service should receive priority, and that any proposed extensions of Metrorail—here or elsewhere—would wait until WMATA puts the Metrorail system in a state of good repair and addresses several expensive core capacity issues (©5-9).

- The City of Gaithersburg is concerned with removal of segments of the CCT from the Plan, especially those that would provide service to the Crown, Kentlands, and Watkins Mill Town Center transit-oriented developments (TODs). The City supports improvements necessary to enhance MARC service. It is also concerned about the impacts of extending the Red Line through Olde Towne, and that it is premature to require a 62'-wide dedication for it. Finally, it does not support a Metro Station at MD 124; if the Red Line extension were to happen, it should be at Metropolitan Grove (©10-12).
- The City of Rockville devoted its testimony not to the Plan's options, but to aver that relatively little of the initial phase of the MD 355 BRT is being built within the City (©13-14).
- The Gaithersburg-Germantown Chamber of Commerce supports the Red Line extension to Germantown as a long-term option, but not at the expense of MARC improvements. Like Gaithersburg, it is concerned about removing from the master plan large portions of the reserved CCT right-of-way, and it questions the feasibility of repurposing travel lanes (©15-16).
- The Action Committee for Transit argues that MARC improvements would provide much more benefit than Corridor Forward would give it credit for (©17-20). Rodolfo Perez, P.E., also testified in support of MARC improvements instead of the Red Line extension (©21-23).
- Robert Eisinger, Chairman of the Board and President of The High Road Foundation, enumerates the benefits of monorail over other alternatives, especially regarding cost, ease of construction, and lack of environmental impact (©24-27). Last year the State completed a feasibility study of a monorail line with six stations between Shady Grove and Frederick City ([Monorail Feasibility Study.pdf](#)).

What a master plan can and can't do. Regarding transportation, master and sector plans are about what rights-of-way should be reserved and where, and the function and general design of transportation facilities. They do not make operational decisions - that is left to the operating agencies. So, for example, while the Plan might determine that a certain road be widened or lanes of it repurposed as dedicated bus lanes, it is left to the operating agency (DOT and WMATA) to specify the bus routes that would use the lanes.

Master plans are not merely aspirational - they have real consequences. For example, if a right-of-way is identified in the Plan, then the Planning Board is charged with exacting that right-of-way as a dedication. Impact taxes are only eligible to be spent on master-planned facilities. Perhaps most importantly, zoning on a property may be approved if there is master-planned transportation facility to serve it. *Therefore, a transportation facility should be included in a master plan only if there is a reasonable expectation that it can happen in the long term: that there is a plausible right-of-way available (or if not, that it be undergrounded), that the community and environmental impacts are not too severe, and that the cost is not unreasonable.*

Finally, the Council is not the only decision maker for many of the options studied under Corridor Forward. The Plan recognizes that its recommendations are advisory only within the bounds of

Rockville and Gaithersburg since each municipality possesses its own planning and zoning authority. Changes to the dimensions and use of I-270, MD 355, and other State highways in the corridor must be approved by the State Highway Administration. Changes to MARC requires approval by CSX and the Maryland Transit Administration. An extension of the Red Line would require approval by the WMATA Board of Directors and the Maryland Department of Transportation (MDOT).

Council staff agrees with most of the County Executive’s comments.

Red Line extension. The assumption for the Red Line extension is that it would run at grade next to CSX for nearly the entire length from Shady Grove to the Germantown Town Center is unrealistic. Doing so would cut off access to Washington Grove from the west by removing the Railroad Street at-grade crossing and render impossible that the East Deer Park Drive (“Humpback”) bridge could be rebuilt to meet the grade of Railroad Street on the east side. It would also cut off access on Summit Avenue and Chestnut Street between the east and west sides of Olde Town Gaithersburg. So, it would be reasonable to assume that if this route is followed, it would be underground from south of the Railroad Street crossing to north of the Chestnut Street crossing. Furthermore, the northern section, which is in a deep cut, would need to go underground from just north of the Waring Station Road overpass of CSX to the Germantown Town Center. These two segments conservatively comprise about two miles of the 7.8-mile extension. The stations at Olde Towne and Germantown Town Center would need to be underground as well, while the intermediate station at either MD 124 or Metropolitan Grove plausibly could be at grade.

For Council staff’s cost analysis WMATA staff suggested using the general unit costs (in 2020 dollars) shown on ©28. The unit cost of underground construction of track is more than 20 times that of at-grade construction, and that an underground station costs three-and-a-half times that of an at-grade station. Using these unit cost values, Council staff estimates the capital cost of the extension to be about \$3 billion, greater than the \$1.6-2.5 billion range cited by Corridor Forward. The Executive questions whether following the CSX route would best serve TODs in the corridor, but any other route would certainly need to be undergrounded for near its entire length, raising the capital cost exponentially higher.

The Executive and WMATA point out that any further investments in Metrorail, beyond what is necessary to provide for a state of good repair, is to greatly improve its core capacity in the center of the region. The cost estimate for the core capacity improvements is \$5.4 billion (in 2018 dollars) and includes such projects as a new tunnel under the Potomac to separate the Blue and Orange Lines, pedestrian tunnels between Farragut North and Farragut West and between Gallery Place and Metro Center, additional rail cars to provide for all trains to consist of eight cars, and many other projects that serve the region. These projects will take decades to achieve, and future extensions will take a back seat to them.

Some have suggested that our plans should include the extension as a “marker,” especially if other regional jurisdictions will be promoting line extensions. It has been noted that Northern Virginia aspires to extend the Orange Line along I-66 and the Yellow Line along I-95 to Prince William County, and Prince George’s County has a vision of extending the Purple Line south along the Beltway to

National Harbor. These ideas are only aspirations and have little or no chance of occurring, even in the long term.²

WMATA points out that the Red Line extension would not meet its criteria for line expansions, which would require much higher densities than envisioned in current master plans in Olde Towne, at MD 124 or Metropolitan Grove, and in the Germantown Town Center. The criteria are displayed on ©29, and it shows that nearby density less than 12 households/acre or 19 employees/acre would be in the “Low” range. According to the most recent Council of Governments Cooperative Forecast, the Germantown Town Center currently has a density of only 2.4 households/acre and 12.5 employees/acre. Even with forecasted growth during the subsequent quarter century, the density in the Germantown Town Center is anticipated to grow by Year 2045 to only 4.1 households/acre and 17.6 employees/acre, still well in the Low range. For comparison, in 2045 White Flint is projected to have densities of 21.9 households/acre and 61.0 employees/acre, and the Bethesda CBD is anticipated to have densities of 17.7 households/acre and 99.8 employees/acre.

For these reasons the Red Line extension should be deleted from Corridor Forward, even as a long-range option. It is unrealistic to believe it would ever happen, and there are other means for providing much improved transit in the corridor.

I-270/I-495 Express Bus Service. The Executive recommends that express bus service using the Opportunity (Op) Lanes—and the direct ramps to be built to and from them—to be an important element of the Plan. He also recommends that expanded park-and-ride be evaluated in the corridor. Council staff strongly concurs. The benefit of such service has likely been underestimated in Corridor Forward. Planning staff modeled four express bus routes, described, and diagrammed on ©30-31. Three of the routes would divert from the Op Lanes for long segments, diminishing the services’ utility for many potential riders. The number of direct ramp connections planned for Phase 1 South (south of I-370) and likely to be planned for Phase 1 North (I-370 to Frederick City) will provide much more flexibility for point-to-point non-stop express service that would operate at the speed limit, regardless of congestion on the general use lanes. Even though not transit, literally, carpools and vanpools would also benefit from the Op Lanes and direct ramps: although not free to them, the toll per rider could be minimal, depending on the number of passengers.

Some have cast doubt that the Phase 1 South and North will ever be built now that there has been a delay in the awarding of a contract to a Phase 1 South concessionaire. This is likely only a temporary delay. Even if a concessionaire is not selected by the time Governor Hogan’s term ends, the strong likelihood is that the project will be implemented. One has only to recall the saga of the Intercountry Connector (ICC), a project surrounded by much more controversy than Phase 1 of the Op Lanes project. The ICC was brought to the brink of approval by Governor Ehrlich during 2002-2006, but Governor O’Malley, who defeated and succeeded him, also decided to support the ICC, and brought it to completion during his terms in office. Similarly, Governor O’Malley brought the Purple Line to the brink of funding, and his successor from the opposing party, Governor Hogan, ultimately decided to support it. Major transportation capital projects that are well advanced in planning and design and have significant wells of support are usually implemented, regardless of changes in political leadership.

² Particularly improbable is a Yellow Line extension along I-95, given that the extension of high-occupancy toll (HOT) lanes to Fredericksburg is close to completion, and VRE is very well established in the corridor serving much the same market.

I-270/I-495 express bus service using the Op Lanes and their direct ramps should be a priority in the Plan, and the means to increase park-and-ride should be explored. This service would serve longer distance transit trips within the County, as well as origins and destinations in Frederick and Fairfax Counties, so its market would not significantly overlap with the MD 355 BRT or the proposed Corridor Connectors, which are designed to serve the local transit market.

Enhanced MARC rail. The Executive’s critique of the Plan’s handling of MARC Brunswick Line improvements is also on point. Corridor Forward is correct in implying that, even with improvements, MARC will continue to serve a smaller transit market than Metrorail and the Corridor Connector and express bus services. However, it can be enhanced by selective additions of third track which could provide the ability to run some off-peak and bi-directional trains. It can also be enhanced by replacing some or all the limited service at the Garrett Park and Washington Grove stations with master-planned stations at White Flint and Shady Grove, respectively, where considerably more potential riders will live and work. Service at other historically significant stations in the County have been eliminated or relocated, notably Forest Glen (decades ago) and Silver Spring (recently).

While Red Line ridership is currently at a low ebb, the expectation is that it will eventually return once riders become more comfortable traveling with others on trains. It will be a slow recovery, because telecommuting has caught on, especially with Federal employees. Nevertheless, perhaps later than sooner, Red Line ridership will approach its designed capacity, even with 8-car train consists. MARC provides a viable alternative to reach Downtown Washington, and it can become more viable with selected improvements noted above, and the potential connection to Virginia Railway Express. **The MARC improvements recommended in existing County master plans should be retained.**

The CCT and Corridor Connectors. The CCT route has always been a somewhat dubious one. While it would serve commuters in the Life Science Center area coming from the Shady Grove Metro Station, nearly the same service could and will be provided by the “interim” bus lines designed by DOT, and two of them are budgeted for construction by FY24. The CCT was never a viable option for Germantown and Clarksburg commuters attempting to reach the Shady Grove Metro Station for points further south; express buses from these locations provide a much quicker connection. The CCT became even less viable after the County routed it even more circuitously to pass through the Belward Farm in 2010. Furthermore, some of the master-planned route, especially the grade separations at MD 124/MD 117 and over the interchange at I-270/Shady Grove Road would be extraordinarily expensive. So, Corridor Forward is on the right track to follow DOT’s approach to enhance bus service between the Red Line on the east to the Life Science Center and Kentlands to the west and, in addition, to provide similar enhanced connections in the Germantown/Clarksburg area.

The Plan recommends six Corridor Connectors, which are described and mapped on pp. 34-42 of the Plan. These Connectors envision the creation of dedicated bus lanes on these roads, although the Plan would defer to a future DOT facility planning study to determine whether each would achieve this by adding two lanes or repurposing two of them. A more detailed study of each Connector is indeed warranted; for example, it may be possible to achieve bus priority by providing queue jumpers in some locations rather than dedicated lanes along the entire length of a road segment. There may be other segments, particularly on portions of six-lane sections of Great Seneca Highway and Germantown Road, where repurposing two of their lanes as dedicated bus lanes will not bring their congestion to a level worse than the applicable Growth and Infrastructure Policy standard.

Both the Executive and the City of Gaithersburg remark that Corridor Forward does not adequately take advantage of certain segments of the already dedicated CCT right-of-way for use as a Corridor Connector, nor does the system serve all the TODs in the area. The Executive also points out that there are perhaps better existing roads to route a Connector; for example, he believes that Redland Road or Shady Grove Road would be a better route to reach the Shady Grove Metro Station than Gude Drive. Although likely to be unpopular with King Farm residents, King Farm Boulevard—in conjunction with Gaither Road—may be a better connection than any of them.³ The Connector system also does not include a route across the planned Dorsey Mill Road bridge, which will likely be built anyway as a point where direct ramps to and from the Op Lanes can be provided.

Concur with the concept of the Corridor Connectors. However, identifying specific routes for dedicated lanes or queue jumpers should await completion of a comprehensive Phase 1 facility planning study to evaluate the feasibility all reasonable options, including utilizing certain dedicated segments of the CCT. DOT staff estimates that such a study would take 18 months to complete; they are developing a cost estimate for the study which should be ready to share at the worksession. **There are two alternative ways to proceed:**

- 1. Do not include in the Plan the road-specific recommendations on pp. 34-42, and amend the plan in 2024 once the facility planning work is done; or**
- 2. Remand the Plan until the facility planning work is done, at which point the Planning Board could reconsider the road-specific recommendations.**

Monorail or light rail to Frederick. The usefulness of any fixed-route transit line in the upper I-270 corridor—including monorail or light rail—is limited by the density within walking distance of the stations and the amount of park-and-ride capacity than can be built at them. The advantages of monorail over light rail are the minimal footprint and the relative ease of construction; a disadvantage is that because monorail is so rare as a public transit mode in the U.S, the ability to maintain it, find parts, etc., would be more of a challenge.

Unlike the other options studied, monorail is the only one that could proceed only if there is consensus between Montgomery and Frederick Counties. **By 2024, when the Plan would be amended or finalized (see Alternatives 1 and 2, above) the leaders of the two counties should determine whether they can agree whether monorail should be a priority over express bus service or MARC improvements.**

Selection of transit project(s) to be funded by Op Lane revenue. MDOT has promised \$360 million for transit associated with Phase 1 South of the Op Lanes project: \$60 million up front and \$300 million in regular payments over the term of the project. The Executive is assuming that the term of the project is 50 years, meaning the County would receive \$6 million annually. Using a conservative net present value discount rate of 5.0%, \$6 million annually for 50 years translates to about \$110 million in

³ When the King Farm development was approved by the County Planning Board, King Farm Boulevard was designed with a wide median explicitly to accommodate the CCT. Only after the City of Rockville annexed the King Farm and residents moved in did this route become unpopular, even though it would provide much better service for residents and employees of the King Farm and, with the County's decision to electrify the bus fleet, transit would be quiet and have zero emissions.

current dollars. Together with the up-front \$60 million, the State’s commitment would be just under \$170 million in current dollars.

The Executive’s Recommended FY23-28 CIP proposes using the \$170 million thusly:

- \$131,507,000 toward the \$314,370,000 cost to plan, design and build the MD 355 Central BRT between Montgomery College/Rockville to Montgomery College/Germantown;
- \$28,472,000 toward the \$86,800,000 cost to plan, design and build the Veirs Mill Road BRT between the Wheaton Metro Station and Montgomery College/Rockville, including along MD 355 between the Rockville Metro Station and Montgomery College/Rockville; and
- \$9,700,000 for the design of the MD 355 South BRT between the Rockville and Bethesda Metro Stations and the MD 355 North BRT from Montgomery College/Germantown to Clarksburg.

The Executive’s proposal should be approved for use of \$170 million from Phase 1. It would create a transitway to Germantown, and between Wheaton and Rockville, where no such service exists. Both routes would serve several Equity Emphasis Areas. The only “overlap” with high quality transit would be the segment along MD 355 between the Rockville and Shady Grove Metro Stations, but Montgomery College/Rockville, which sits between them, is currently not served well by either station. The design funds for the balance of the MD 355 BRT, once completed in FY24, would render these segments eligible for Federal funding for construction.

The City of Rockville is getting a fair share of the benefit from this proposal. Between the Veirs Mill and MD 355 Central lines, there will be 6.0 miles of BRT and 7 stations within the City. By comparison, Gaithersburg will receive the benefit of 4.0 miles of BRT and 6 stations within its boundary. (Neither municipality is contributing funds for these projects.) The non-municipal portion of these lines will comprise 7.6 miles of BRT and 10 stations, less than the two cities combined.

Council staff requested OMB to conduct a sensitivity analysis regarding the \$300 million Op Lane contribution. Assuming a combination of a somewhat lower discount rate and a shorter payout duration would result in more net present value (NPV) that could be used for County transit projects in the corridor:

	50-year Payout	40-Year Payout	30-Year Payout
Annual Payout	\$6,000,000*	\$7,500,000	\$10,000,000
NPV – 5.0% discount rate	\$109,535,553*	\$128,693,148	\$153,724,510
NPV – 4.5% discount rate	\$118,572,047	\$138,011,883	\$162,888,885
NPV – 4.0% discount rate	\$128,893,108	\$148,445,804	\$172,920,333

* Executive’s assumptions.

For example, if the payout were negotiated to occur over 40 years, and if the discount rate were assumed to be a slightly less conservative 4.5%, then this would generate a NPV of about \$138.0 million, \$28.5 million higher than the Executive’s assumption. This would be enough funding needed to complete the White Flint Metro Station Northern Entrance project: \$26.1 million. **In finalizing the agreement with the \$300 million payout from the State, try to negotiate a shorter period and a more favorable discount rate.**




OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

M E M O R A N D U M

February 14, 2022

TO: Gabe Albornoz, President
Montgomery County Council

FROM: Marc Elrich, County Executive 

SUBJECT: Corridor Forward: the I-270 Transit Plan Comments on Planning Board Draft

Over the last several months, the Department of Transportation (MCDOT) staff have been working closely with Planning staff on aspects of Corridor Forward: the I-270 Transit Plan (“Corridor Forward” or “the Plan”). I appreciate the time and effort that the Planning team members have dedicated to work collaboratively with my transportation team toward an improved draft for consideration. I strongly support several aspects of this plan, including the prioritization of the MD 355 and Veirs Mill BRT lines as well as the prioritization of other transit, bicycle, and pedestrian improvements in the corridor. Dramatic improvement to our transit network is an important way to improve accessibility for our residents and to encourage continued growth of key activity centers and industry clusters.

However, I must highlight significant concerns with some recommendations of the Plan. The specific comments outlined below are offered for your consideration, and I hope that, upon your consideration, you join me in the opinion that these concerns are significant enough to justify further refinements to the Plan.

Red Line Extension: The Plan’s recommendation for a Red Line extension is not adequately supported by the analysis. There are technical, organizational, and financial hurdles that have not been studied at the level of detail necessary to include the recommendation as a viable solution for the corridor.

For example, the plan does not evaluate the possible alignment of the extension but decides that it should just follow the CSX railroad. This choice results in a duplication of the current MARC rail alignment and fails to include major potential growth areas located to the east of the railroad, particularly within the City of Gaithersburg. It is unclear to me whether following the CSX railroad is an appropriate alignment for an extension. If it is, the plan did

not assess if the additional 100+ feet of right-of-way could be attained along the CSX track, or if CSX would even allow for a parallel heavy rail service.

Operational considerations, such as lack of capacity of the Metrorail service south of Shady Grove station – particularly south of the Bethesda Station, have not been studied or considered at all. Limitations elsewhere on the Red Line may necessitate billions in investment to support expansion of the line. In addition, WMATA must focus on state-of-good repair, absorbing expansions not yet in operation, and achieving financial sustainability in the coming years. Notably, WMATA provided comments to the Planning Board in December of 2020 noting significant concerns with the Red Line extension concept (see attached letter).

Notwithstanding these and other significant technical constraints, the analysis shows that the costs of a Red Line extension far outweigh the anticipated benefits. The estimated cost is \$1.6-2.5 billion, and the project is anticipated to generate about 5,000 new transit trips in the county by 2045 (increase of 0.14% transit ridership), a VMT reduction of 157,000/day (0.07% of the County's daily total VMT), and an increase of 2,000 jobs (+0.1% impact to County). These transportation benefits of the Red Line extension are one-quarter to one-half of those of the bus rapid transit in the corridor at more than twice the cost. The results of the Corridor Forward analysis indicate that investment in high-quality, bus-based transit provides a much higher return-on-investment than rail expansion.

As indicated in the Plan, significant feasibility analysis and land use considerations are still needed to determine if a Red Line extension is a feasible or desirable option in the future. Clearly, implementation of such a project would fall well outside of the lifespan of this plan. I recommend removal of the Red Line as a primary recommendation within the timeframe of this plan until further analysis can be completed, although it may be appropriate to represent the Red Line as a longer-term idea.

I-270 Express Bus Service: The Plan presents conflicting or absent information on operating bus services along I-270, with or without the State's proposed "Opportunity Lanes" or "Op Lanes" project (formerly referred to as "Managed Lanes"). The County and the Maryland-National Park and Planning Commission (M-NCPPC) have been insisting that the State include transit in the proposed Op Lanes project, and it is important that Corridor Forward is consistent with this position by reinforcing the importance of providing enhanced transit service that uses I-270. Clearly such services meet very different needs than those within our community, but should, nevertheless, be an element of this plan.

The Plan should evaluate how to best use the Interstate corridor, such as identifying activity centers, potential park-and-ride locations, dedicated bus access along local roadways, and associated right-of-way needs to support these uses. It is also important to identify right-of-way requirements at points crossing I-270 and potential facility connections needed at interchanges and on bridge structures.

With or without the Op Lanes project, there is a market for highway-running express bus service and park-and-ride access in the corridor to serve upcounty residents, travel from outlying counties, and for those who are unable to access bus rapid transit. It should be noted that express services operated by the County and MTA historically have been very popular. The transit solution for this corridor will necessitate a wide variety of options, likely including express bus services, and Corridor Forward should include and clarify this need.

Corridor Cities Transitway (CCT): The CCT has already obtained right-of-way dedication and accommodating design commitments from developers, notably at the Belward and PSTA sites. This plan, as drafted, would remove the requirement for transit infrastructure through these future developments. It does not seem that this change has been adequately considered and aligned with goals to promote transit-oriented development. There are also communities and major generators intended to be served by the original CCT that are no longer served by the Corridor Forward proposal, such as the Universities at Shady Grove, King Farm, and Crown Farm/RIO. While I have advocated for changing the alignment of the CCT, I am not convinced that the alignment proposed adequately serves the transit needs of the area.

Specifically, I suggest that the newly proposed alignment along Gude Drive be reconsidered to be on Shady Grove Road or Redland Boulevard, both of which have more transit-supportive land use. Additionally, we recommend that the Corridor Forward Plan not change the “transit” designation on any roadway until additional analysis can be conducted as part of area master plan amendments and updates. The draft’s implementation plan also needs to make clearer that the responsibility for implementation of a major transit project in this area should remain a State responsibility as a continuation of work on the CCT.

MARC Stations: The Plan largely downplays the importance of MARC service in the overall transit network for the corridor, even though commuter rail may be an efficient and effective transit option for many Upcounty residents. While support for the State’s proposed MARC improvement plans is mentioned, the Plan does not adequately elevate MARC rail and its potential to the level of importance it should have in the regional network. MARC can provide connections that are similarly time efficient and may provide connections not possible by Metrorail. Examples include cross-county links between the I-270 corridor and Kensington and Silver Spring, connections to Union Station and Capitol Hill, and in the longer term, connections to L’Enfant Plaza, National Landing, National Airport, and Alexandria using a regional commuter rail system.

The recommendations for MARC stations also do not appear to have adequate supporting analysis. They need to more directly address technical constraints of a potential MARC Station at Shady Grove, as well as how the addition of two new stations would affect lower-ridership stations such as Washington Grove or Garrett Park. This draft also presents unclear information as to the role of the Metropolitan Grove station in relation to the proposed transit hub at I-270 and MD 124 and recommends relocating this station to align with the proposed

Red Line extension. We suggest language be added to clarify that this recommendation is contingent on feasibility studies for the Red Line extension or otherwise justify the relocation of this station.

Park and Ride and Land Use Assumptions: In making recommendations for the best way to serve the corridor with transit, the plan has ignored that park-and-ride infrastructure is likely to be needed for a considerable time if we expect Upcounty and residents from beyond the County to access transit. Before the pandemic, many of our park-and-ride facilities were over-capacity, limiting access to transit. If the Metrorail Red Line is extended to Germantown without park-and-ride capacity at one or more stations and high levels of densification, ridership will not justify the tremendous resource investment.

In general, the plan does little to address necessary changes in complementary land use policy to make the new transit services successful. Without adequately addressing these issues, transit expansion could result in the illusion of accessibility but actually accelerate exurban sprawl and reliance on automobile travel as the only truly viable choice for some residents. Improving the transit supportive land use near the proposed facilities and providing for access for those more distant are both needed given the lower concentrations of development in the Agricultural Reserve and in surrounding counties.

I appreciate the Council's consideration of these concerns. Corridor Forward is an opportunity for us to work together to get the future of transportation right for the County, and now is the time to pay attention to detail and make necessary adjustments to the draft for the best possible final plan.

Enclosure: WMATA Comments to the Planning Board

cc: Christopher Conklin, Director, MCDOT
Yaakov "Jake" Weissmann, Assistant Chief Administrative Officer, CEX
Claire Iseli, Special Assistant, CEX
Ken Hartman, Director of Strategic Partnerships, CEX
Hannah Henn, Deputy Director of Policy, MCDOT
Gary Erenrich, Special Assistant to the Director, MCDOT
Andrew Bossi, Senior Engineer, MCDOT
Corey Pitts, Planning Section Manager, MCDOT
Joana Conklin, Bus Rapid Transit Program Manager, DGS

December 7, 2021

Casey Anderson, Chair
Montgomery County Planning Board
2425 Reedie Drive, Wheaton, MD 20902



Re: Metro's Comments on Corridor Forward: The I-270 Transit Plan
Public Hearing Draft

Dear Mr. Anderson,

On behalf of the Washington Metropolitan Area Transit Authority (Metro) we are submitting comments on the Corridor Forward: The I-270 Transit Plan ("the draft plan"), Public Hearing Draft. Metro appreciates the opportunity to comment on the draft plan.

The draft plan recommends the following investments, among others:

- Prioritizing MD355 and Viers Mill Road Bus Rapid Transit (BRT) projects,
- Recasting the Corridor Cities Transitway as a "corridor connector,"
- Supporting MARC Brunswick Line right-of-way acquisition,
- American Legion Bridge improvements to allow rail transit (to support a possible Purple Line extension),
- Updated supporting master land use plans, and
- An extension of the Metrorail Red Line to Germantown Town Center, with two intermediate stations at Old Town Gaithersburg and MD124.

Metro applauds the intent to advance high-capacity transit solutions throughout the region and is currently working collaboratively with jurisdictions to advance major initiatives. We appreciate county planning staff's coordination with us and inclusion of some of Metro's priorities in the public hearing draft report. Metro is willing to consider its support of the plan with the Planning Board and County's additional consideration and responses to our comments below.

Metro would also like to emphasize the following points for your consideration.

- We suggest that some form of MARC Brunswick Line improvements, similar to those envisioned in the Greater Washington Partnership's Capital Region Rail Vision, coupled with planned BRT investments and focused master planning, may offer a more cost-effective solution to the needs of the I-270 corridor. Given that the MARC Brunswick Line already serves much of the corridor, enhanced bus, BRT and MARC service, including 15-minute peak and all-day bidirectional service called for in the Rail Vision, may offer more robust benefits to the higher growth and equity mid- and east-county communities noted in the draft plan. Moreover, if MARC service is eventually extended into Virginia via a new planned Long Bridge crossing, additional Brunswick Line trips to L'Enfant Plaza, Crystal City and beyond, would expand job access opportunities for communities on both sides of the Potomac beyond those assumed in the draft plan. Regarding the implementation challenges and other concerns noted in

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*A District of Columbia,
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the draft plan, the county could engage with MTA and regional stakeholders refine the assumptions in the Cornerstone Plan and Rail Vision to better reflect the county's needs.¹

- With respect to discussions surrounding extensions to Metrorail, Metro has indicated [previously and consistently](#) that any further extension of Metrorail can only be contemplated after solutions and funding commitments have been made that remedy Metrorail's existing core capacity issues. Metro remains committed to this position.
- The envisioned Red Line Metrorail extension does not meet the Authority's minimum guidelines for density, ridership, and connectivity, as noted in the report. For the proposed Red Line extension to be a responsible and effective regional investment, the corridor's proposed station areas would need to accept significant land use changes and increases in population and employment density.
- Metro is legislatively required to keep annual operating subsidy increases at or below three percent with certain exemptions.² Although the first year operating subsidies resulting from major capital projects, such as Metrorail extensions, are excluded from the three percent cap, subsequent operating subsidy payments resulting from such projects are not. As a result jurisdictional financial capacity will likely constrain the region's ability to financially support major new investments and additional operating and maintenance costs beyond Metrorail's current footprint for the foreseeable future.
- Prior to advancing any future Metrorail extension, Metro staff will need to conduct an independent study to understand impact of the proposals on the agency's capital assets and operations and maintenance needs.
- The proposed Metrorail Red Line extension would require significant capital investments and entail considerable implementation risks. As the plan notes, a new railyard would need to be built adjacent to the corridor at or near the proposed terminus, resulting in a locally unwanted land use along an already modestly developed corridor. Based on the draft plan's assumed alignment, implementation would require successful negotiation with and right-of-way acquisition from CSX Transportation, the Brunswick Line's owner, for use of the railroad corridor at their sole discretion. The report should make clear that locating a new rail yard facility adjacent to the corridor and acquiring new right-of-way from CSX would be a challenging and expensive undertaking.
- We encourage the county to arrive at consensus decision regarding BRT in the I-270 corridor. These proposed BRT routes are important to advancing the county's land use goals at the Shady Grove and Rockville Metrorail stations, where the services could have major connections. Due to capacity limitations as these locations, the transit facilities may need to be reconfigured to support the BRT services, which could add significant costs and may require additional space and reduce the land area that could be available for development. The advancement of real estate development opportunities will be dependent upon finalizing the transit facilities program.

The following are Metro's specific comments on elements of the Public Hearing Draft:

Chapter 1 – Executive Summary

¹ Aside from MTA's Cornerstone Plan noted in the draft plan, see the Greater Washington Partnership's Rail Vision found here: <https://greaterwashingtonpartnership.com/capital-region-rail-vision/>

² Northern Virginia Transportation Commission's Three Percent Cap Report can be found here: http://www.novatransit.org/uploads/WMATA/NVTC_3PctCap_FullReport_WEB.pdf

Metro appreciates that the study clearly identifies many of the challenges and constraints associated with extending Metrorail in this corridor, as briefly noted in the Executive Summary and documented in more detail in Chapters 4 and 6. These are critical considerations that should be highlighted during any Metrorail extension discussion. To highlight their importance for policy makers, Metro recommends these specific considerations be included in the Executive Summary.

- Funding commitments³ must be made for Metrorail's core capacity needs – determined by Metro's documented evaluation – prior to advancing any new extensions,
- An extension must meet or exceed Metro's station area land use density, ridership, and connectivity targets,⁴
- An extension's complete lifecycle investment – capital investment and ongoing operations and maintenance needs – must be financially affordable for the State of Maryland and the Metro Compact members,⁵ and
- An extension must be able to navigate implementation challenges, such as building a new corridor railyard facility and acquiring right-of-way from of corridor majority owner CSX Transportation.

We appreciate that the draft plan notes the need to support transit recommendations with master plan changes and appreciate the inclusion of Metro's guidelines for density, ridership, and connectivity. Understandably, many suburban and exurban communities lack the density needed to support Metrorail and land use change takes decades. However, Metro asks that the Executive Summary be clear about the magnitude of land use changes that the county would have to implement – and the community would have to accept – along the corridor for the proposed Metrorail Red Line extension to meet Metro's guidelines.

Chapter 4 – Initial Evaluation

While we understand that the draft plan was intended to evaluate and recommend transit options to meet county goals and address challenges for an expansive I-270 corridor, we suggest that the draft plan include a more robust alternatives discussion about the appropriate roles of each mode in meeting these goals. This would allow a more nuanced understanding of land use and ridership targets for high-capacity transit (bus rapid transit, commuter rail, etc.) versus Metrorail service.

For example, the draft plan's proposed 7.8-mile Red Line extension forecasts about 8,000 riders in 2045, which assumes over two decades of corridor growth. In context, Metro's Expansion Guidelines suggest the extension should target an average daily ridership of between about 27,000 and 55,000 riders to be a financially sustainable for Metro and the region, a target three to seven times above the draft plan's forecast. While additional station area master land use planning could enhance corridor population, employment and ridership, policy makers today should be clear to the community and other stakeholders about the magnitude of changes required beyond current plans. For a regional example of how to address land use targets, we would point to Virginia Department of Rail and Public

³ Funding commitments entail Metro Board-endorsed solutions to modify the Adopted Regional System, funding commitments included in the Transportation Planning Board's adopted Long-Range Plan, and accompanying line items in jurisdictional budgets

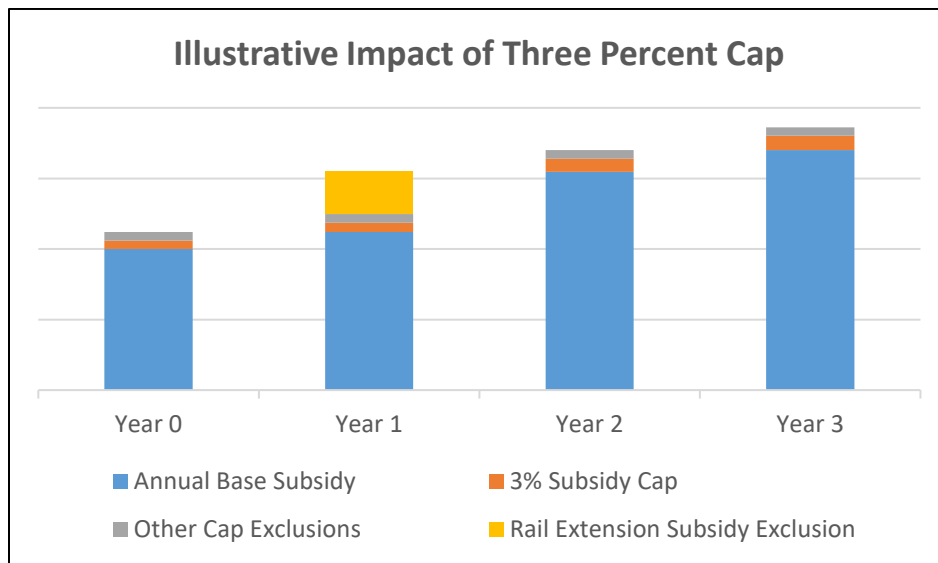
⁴ Metro's Transit Corridor Expansion Guidelines can be found here: <https://planitmetro.com/wp-content/uploads/2015/12/Task-5-Final-Report-2015-03-25.pdf>

⁵ Metro Board policy assigns capital funding responsibility for new Metrorail extensions to the jurisdiction(s) where the project is located and assigns the resulting ongoing operating subsidy and maintenance funding responsibility to all Metro Compact members.

Transportation's 2015 Route 1 Corridor Study which highlighted land use changes needed to accompany a proposed Metrorail Yellow Line extension to Hybla Valley in Fairfax County.⁶ This is important context for making an informed decision about the type of mobility solution best suited for the corridor.

Other Considerations

The three percent cap creates pressure to minimize current and future operations and maintenance (O&M) costs, even if Metrorail extension first year operating subsidies are exempted. Metro's growing capital program is mostly focused on repairing and modernizing the existing system. However, the addition of future major new capital projects would add asset ownership and operational responsibility on top of Metro's existing state of good repair backlog, unfunded capacity needs, financial obligations, and legislative mandates.



For example, as shown in the graphic above, operating subsidies resulting from the first year of operation for a Metrorail line extension would be exempt from the three percent cap. However, in every following year these resulting rail operating subsidies would become part of the baseline cap calculation. Additional subsidies such as these create external financial pressure on the agency's budget and the region, constraining Metro's ability to consider alternative investment choices. These factors, among others, necessitate the expansion prerequisites and independent evaluation process noted above.

Metro appreciates the work undertaken to date and the opportunity to comment on the draft plan. If you have any questions or would like to discuss any of the comments, please contact Jonathan Parker at jhparker@wmata.com or 202-962-1040.

⁶ The reference to the plan is discussed here: <https://planitmetro.com/2015/10/29/metrorail-core-capacity-needs-and-the-challenges-of-outward-expansion/>. The plan itself is here: <http://www.drpt.virginia.gov/transit/planning/route-1-multimodal-alternatives-analysis/>

Sincerely,

A handwritten signature in black ink, appearing to read "Shyam Kannan", with a horizontal line extending to the right.

Shyam Kannan
Managing Director, Office of Planning

Cc:

Regina Sullivan, WMATA
Charlie Scott, WMATA
Steven Segerlin, WMATA
Allison Davis, WMATA
Jonathan Parker, WMATA
Melissa Kim, WMATA
Jessica McVary, Montgomery Planning
Jesse McGowan, Montgomery Planning
Patrick Reed, Montgomery Planning
Gary Erenrich, Montgomery DOT



February 9, 2022

Honorable Gabe Albornoz
Council President
Montgomery County Council
100 Maryland Avenue, 4th Floor
Rockville, MD 20850

RE: Corridor Forward: The I-270 Transit Plan

Dear Council President Albornoz:

The City of Gaithersburg appreciates the opportunity to provide comment on the Corridor Forward I-270 Transit Plan (Plan) going before the County Council for a public hearing on February 15, 2022. Upon review of the document, the City offers the following comments for consideration. The City supports the intent of the Plan to increase beneficial transit options that connect residents to jobs. However, the City does have questions and concerns regarding the Plan. We offer the following related to the Plan's recommendations:

MD 355 BRT:

The City appreciates and fully supports the priority given to the MD 355 BRT line and further supports the County Executive in identifying the portion of this line serving Gaithersburg to be included in construction CIP for FY '23.

Corridor Connectors:

The City's support of the Corridor Cities Transitway (CCT) is well documented. The City has planned and/or approved transit-oriented developments (TOD) such as Crown, Kentlands Commercial District, and the Watkins Mill Town Center leveraging planned CCT stations. The Plan's recommendation to replace the CCT with a collection of infrastructure facilities, Corridor Connectors, raises concerns for the City:

- The CCT was a transit service with the Phase I associated infrastructure fully constructed at one time.
- The Corridor Connectors do not serve many of the City's CCT-based TODs referenced above.

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Tanisha R. Briley

- The Corridor Connectors are solely infrastructure facilities (dedicated bus lanes) with no associated transit service; has sections in the City that cannot facilitate dedicated bus lanes without property takings; and will have a potentially disjointed, piecemeal implementation creating conflict points with traffic should the lanes be bi-directional (two-way on one side of the road). There are several additional concerns such as how are buses to enter and exit the Connectors while crossing opposite flow traffic? The Plan does not define specifics as to how these lanes are to be configured on roads.
- The CCT transitway (planned bi-directional) and station location future land reservations in the City were granted by property owners to facilitate a branded service, often specifically referencing the CCT for dedication. Roads, such as Decoverly Drive, in the City, were designed and constructed with a 50 foot wide median for the CCT that will go unused and unserved under the current Corridor Connectors plan.
- For the Corridor Connectors to be effective, at a minimum, the Great Seneca and Life Sciences Connectors should be built in a single-phase and not separated. This construction should be in coordination with the full funding of the Great Seneca Transit Network Lime (including extended), Pink, and Cobalt lines.
- The draft MDOT State Transit Plan and the MCDOT Great Seneca Transit Network both identify the CCT as the ultimate planned project goal.

MARC:

The City acknowledges the Plan supports MARC enhancements and expansion, but questions why MARC was not included in the Plan's recommended network. MARC expansion was a cornerstone of the adopted 2013 Countywide Transit Corridors Functional Master Plan. The City questions the arguments made against including MARC in the Plan's network. MARC expansion of the Brunswick Line is the top priority in the draft MDOT State Transit Plan and phased implementation, as was discussed in the State's MARC Cornerstone Plan, should be addressed in the Plan.

Metro Red Line Expansion:

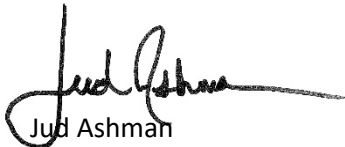
Expansion of the Metro Red Line is the ambitious long-term goal of the Plan. Specific concerns related to this recommendation include:

- The impacts to the City and in particular Olde Towne, are downplayed in the Plan. The majority of property impacts/takings will occur in Equity Emphasis Areas within the City.
- The Plan discusses a specific alignment along the CSX tracks, but acknowledges alternative alignments may be considered should expansion move forward following a feasibility study. The City is of the opinion that the Plan is premature in recommending acquiring 62 feet of right-of-way (ROW) along CSX with no feasibility study completed and alignment determined.

- Much of the justification for Red Line expansion expressed in the Plan is based upon a single service trip, but the goal of the Plan is to provide an interconnected network between services. If this is truly the goal, then the Red Line expansion justification is reduced.
- The Plan states the Red Line expansion does not meet current WMATA standards but does not provide either a discussion in the standards gap (how close or far from meeting standards) or a plan to meet such standards.
- The City does not support creating a new transit station near MD 124 resulting from a Red Line expansion and relocating the Metropolitan Grove MARC Station. Much as with the CCT discussion, the City has proactively created both commercial and residential TODs immediately near the Metropolitan Grove MARC Station. It is anticipated that by early next year there will be almost one million square feet of bio/life science uses in the immediate area. There is currently a new residential plan that includes up to 287 new single-family ownership units immediately across the CSX tracks from the station entering the public hearing process, with more residential forthcoming.
- The proposed relocated station location does not have the extensive and intensive development existing or planned and would only create additional property takings without being able to create the jobs or housing found near Metropolitan Grove.
- Any new multi-service transit hub should be analyzed as part of a Metro expansion feasibility study and the current detailed recommendation removed from the Plan.

Thank you for your consideration of our concerns and recommendations.

Respectfully submitted,



Jud Ashman
Mayor
City of Gaithersburg



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February 15, 2022

The Honorable Gabe Alborno, Council President
Montgomery County Council
100 Maryland Avenue
Rockville, Maryland 20850

Dear Council President Alborno,

The Mayor and Council of the City of Rockville thank you for the opportunity to comment on the Bus Rapid Transit (BRT) projects and the Op Lanes Funds.

The City of Rockville supports Montgomery County's Transportation Project for the Veirs Mill and MD 355 Bus Rapid Transit (BRT) projects for design and construction. Both projects will benefit the community in Rockville and surrounding neighborhood, not just as a transit improvement, but also for safety, health, economics, and environmental benefits.

Rockville appreciates the opportunity to provide input on those projects and their funding source, specifically the portion provided by the state's Op Lanes funds. As currently proposed, a significant portion of the Op Lanes funding is being used on BRT outside of the Op Lane's northern limit at I-370. The City has serious concerns about this approach and requests the County Council reconsider the use of the state's Op Lanes funds and revise the 355 Central BRT project limits and/or sequence.

The MD 355 Central BRT project is the only portion currently proposed for design and construction on MD 355 and has been identified as the portion between Montgomery College campuses in Rockville and Germantown. While 42% of the funds for this project comes from the Op Lanes project, the City of Rockville – the most impacted by the Op Lanes project – will get a negligible benefit from the MD 355 Central BRT project since only one stop out of ten falls within the City of Rockville. This is not an appropriate or fair distribution of the Op-Lanes funds. I ask the County reconsider the funds allocated for this project and to revise the MD 355 Central BRT project's limits.

Looking at the forecast passenger boardings for the MD 355 BRT project, it is clear that projected daily boardings for the northern three stations of the MD 355 Central BRT are very low compared to any station in the MD 355 South BRT project. The total projected daily boardings for the northern three stations of the MD 355 Central BRT project **combined** is approximately 1,000 boardings per day, while three out of the four northern stations of the MD 355 South exceed 1,000 boardings per day each (please see the attached graph). One of them (Twinbrook) actually exceeds 1,500 boardings per day, and the White Flint station exceeds 2,000 boardings per day. If the Op Lanes funds will be used to fund the MD 355 Central BRT project, the limits should include stations in Rockville, at a minimum the Rockville Metro station and down to Twinbrook or preferably White Flint stations. If it is not possible to add the Rockville Metro station and others from Rockville, then the city recommends shifting the MD355 Central BRT project three stations to the south. This will eliminate the northern three stations that have the lowest projected boardings and instead add the three northern stations currently in the MD355 (Rockville Metro, Mt. Vernon and Edmonston), which have much higher boardings.

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CITY MANAGER
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COUNCIL OPERATIONS
Sara Taylor-Ferrell

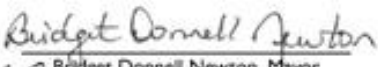

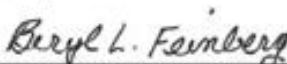
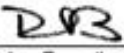
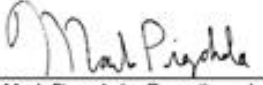
CORPORATE COUNSEL
Robert E. Dawson

The Honorable Gabe Albornoz, Council President
February 15, 2022
Page Two

Finally, the Op Lanes Work Group currently being formed by MDOT is supposed to be taking up the issue of prioritizing transit funding, therefore the proposed Montgomery County budget pre-empts the cooperative intent of that group. We further recommend that the County Council consider only funding the overall 355 BRT project and defer a decision on the exact alignment and stations in the first phase until after the Op Lanes Maryland Work Group confers.

This will ensure that a collaborative solution is implemented that serves more Montgomery County residents sooner and provides a more equitable distribution of Op Lanes Maryland funding to the neighborhoods most affected by the State project.

Sincerely,

 Bridget Donnell Newton, Mayor	
 Monique Ashton, Councilmember	 Beryl L. Feinberg, Councilmember
 David Myles, Councilmember	 Mark Pierzchala, Councilmember

Rockville Mayor and Council

cc: Montgomery County Council

**CORRIDOR FORWARD: The I-270 Transit Plan Public Hearing Draft
PUBLIC HEARING – Montgomery County Council
February 15, 2022**

Thank you for the opportunity to comment on the working draft of the Corridor Forward: The I-270 Transit Plan. The Gaithersburg-Germantown Chamber of Commerce has engaged in the public process and is very interested in increasing transportation capacity in the I-270 corridor. We also want to thank planning staff for their efforts in involving the community throughout the various stages of the draft plan.

Overall we are encouraged by the number of options provided in the transit network, understanding that some of the projects will take significantly longer to implement than others

We would like to comment on the following aspects:

1. Red Line Metro to Germantown – We understand that this is a long-term transit option and agree that the option of adding metro to Germantown would greatly increase transportation capacity. We fully support future study. This should not be instead of expansion of MARC Rail.
2. Corridor Connectors – The “corridor connectors” provide significant transit options in the corridor as they tie into existing transit options including the proposed Great Seneca Transit Network. However, eliminating the original Corridor Cities Transitway project eliminates a critical north-south transit connection between Gaithersburg / Germantown / Clarksburg. The proposed alternative to the original CCT route is not ideal. It takes a high-quality BRT route with dedicated roadways and splits it in half with portions running in mixed traffic. Although the project will provide a “one-seat” ride from the life science center to residential hubs of Germantown and Clarksburg, it is no longer rapid. Using the proposed 355 BRT route on the East side of I-270 does not take the place of the CCT. The Chamber has been a steady advocate for the Corridor Cities Transitway for the past fifteen years. A significant amount of time and money has already been spent on this transit project. The right-of-way exists to move this project forward.
3. Repurposing Lanes – We question the suggestion that existing general-purpose travel lanes could be repurposed solely for transit. As staunch advocates of the CCT, we wholeheartedly agree that BRT is most effective with designated travel lanes. We also know that it will be extremely difficult to repurpose auto lanes to make that happen. We understand that future traffic studies will determine whether repurposing lanes is feasible. Anecdotally, anyone who drives these roads on a daily basis will tell you it is impossible. The BRT options included in the

plan need to assume construction of designated travel lanes and not be conditional on repurposed lanes.

Thank you for your consideration.

Contact: Marilyn Balcombe, mbalcombe@ggchamber.org

**"Corridor Forward" Plan for Transit in the I-270 Corridor
Action Committee for Transit
Testimony to Montgomery County Council, February 15, 2021**

Unfortunately, the issues we raised in our testimony to the Montgomery County Planning Board in December were not addressed. Therefore, we are resubmitting the testimony (appended below) to the Montgomery County Council for this hearing.

**"Corridor Forward" Plan for Transit in the I-270 Corridor
Action Committee for Transit
Testimony to Montgomery County Planning Board, December 9, 2021**

For 60 years, Montgomery County planners have tried to create walkable, transit-oriented new towns north of Rockville. For 60 years, they have failed. But the staff draft Corridor Forward plan makes no effort to change course. Rather than trying to correct the mistakes of the past, it preserves the policies and practices that create auto-oriented suburban sprawl. Even where it proposes new bus lanes, it runs them along pedestrian-hostile high-speed highways where buses will never be attractive alternatives to driving.

The draft recommends prioritizing a Red Line extension to Germantown over MARC. This project would require an entirely new right of way and does not meet WMATA criteria for Metrorail projects. MARC service, unlike the Red Line extension, can be increased incrementally as funds are available. The practical effect of prioritizing the Red Line would be to reject any new rail transit service in the upcounty for the indefinite future.

The rationale given for this recommendation is cost-effectiveness. The project consultants calculated that spending \$1.2 billion on MARC will yield 3800 added transit rides per weekday, while spending \$1.5 billion on the Red Line will yield 8400 new rides. But estimates of cost and ridership are quite uncertain at the study's level of analysis, and the consultants' analysis (summarized on pages 21-27 of Appendix 3) is heavily slanted to favor the Red Line over MARC.

We believe that a realistic analysis would show MARC expansion to be more cost-effective. And beyond that, MARC expansion has great advantages that cost-effectiveness analysis does not capture. Expanded MARC service should be the highest priority for transit upgrades in this corridor, both short-term and long-term.

Cost

The number of new MARC trains you get per dollar of new track is the outcome of a negotiation with CSX, rather than a direct outcome of the engineering. The study says \$1.2 billion will get you only 16 added round trips per day. This is very pessimistic. The 2007 MARC Growth & Investment Plan said \$530 million gets you that many round trips or more.

The MNCPPC consultant's assumptions for the MARC third track seem to be based on the MTA's MARC Cornerstone Report, which we see as largely an exercise in coming up with excuses for not expanding MARC service.

The 2007 MARC plan assumed third track is needed only from Point of Rocks to the Beltway. The Cornerstone Plan, like the consultant report, assumes it must go all the way to Union Station. Not only that, it lists the track between Silver Spring and Union Station as the first critical-path item for added service. Since this is the most difficult and expensive section to build new track, it basically rules out sequential improvements. It is also contrary to common sense, because you would think a passing track would be most useful to CSX in the middle of the two-track section between Brunswick and Ivy City, not at one end. (To preserve the option of maintaining current freight capacity by turning off-peak trains around before they reach the two-track section, Corridor Forward should amend the White Flint master plan to provide right of way for pocket tracks at the future White Flint MARC station.)

While overstating the likely cost to run MARC trains, the consultants low-balled the cost of a Red Line extension. They first estimated this cost at \$1.8 billion. But they reduced this number to \$1.5 billion, contrary to their own opinion, at request of MCDOT (see appendix p 26). The effect of prioritizing the Red Line is to postpone any added rail service into the indefinite future. The upcounty deserves more train service.

Ridership

The study assumes (see appendix p 6) I-270 is widened north of Shady Grove, with 4 southbound and 5 northbound lanes between Clarksburg and I-370 and 4 lanes in each direction between Clarksburg and Frederick. MDOT's contract with Transurban makes this widening very unlikely without a giant state subsidy.

With the assumed widening of I-270, 39% of the new transit trips predicted for a Red Line extension to Germantown are from people who live outside Montgomery County (see p 38 of this staff report). However, if I-270 is not widened north of Germantown, MARC trips originating in Frederick County would be much more attractive and driving on I-270 to a Germantown Red Line station would be less attractive.

Moreover, even if Transurban eventually builds HOT lanes to Frederick, it will manage the tolls to keep traffic highly congested at the Clarksburg merge point. We doubt that the consultant's traffic modeling took this into account.

The ridership model assumed that future jobs and population in the downcounty downtowns of Silver Spring, Rockville, and Bethesda are constrained by current zoning. This is not a reasonable assumption for a study that predicts 2045 ridership, let alone for infrastructure upgrades that will shape land use for a half-century and more. Master plans for the county's built-up downtowns only designed to accommodate growth for 10 or 20 years and are regularly updated to reflect growing regional population and the increasing demand for walkable urbanism. All-day MARC service will significantly upgrade transit access to Rockville and

Silver Spring, whereas a Red Line extension would not add rail service anywhere south of Shady Grove. Ridership predictions for MARC should reflect residential and job growth in the downtowns that get new service.

Perhaps as a result of these assumptions, the consultants estimate added MARC ridership in 2050 at only 20% of the new seats. This seems very pessimistic when the Brunswick Line was running close to capacity before Covid.

Other benefits of all-day MARC

This highly uncertain cost-benefit calculation is entirely the wrong basis for a transportation choice that will play out over decades. No one can say with any confidence today whether a Red Line extension or a MARC third track will attract more new riders per dollar. The plan should start from our overall planning goals, decide which of these two transit lines best serves them, and then examine what needs to be done to make that choice cost-effective.

From this point of view, all-day MARC service is clearly the superior alternative. Advantages not considered in the study include:

- By creating another axis of all-day transit service, it would strengthen the transit-oriented nodes of Silver Spring, White Flint, and Rockville and create new nodes in Kensington, Gaithersburg, and Germantown by making car-free living far more convenient.
- Expansion of MARC service can begin now, with more trains added sequentially as sections of new track are built. Prioritizing Red Line extension, which requires one giant expenditure, postpones any action into the indefinite future. The upcounty should not wait decades for more train service.
- Two-way MARC service would give Montgomery County transit riders access to the walkable downtowns of Frederick and Brunswick, and potentially to Hagerstown.

Even with its slanted assumptions, the study predicts 26 new riders per new train trip for the Red Line extension versus 119 per new train trip for MARC. This is further evidence of MARC's effectiveness in serving the county's land-use planning goals.

Bus upgrades

Like many past planning documents, Corridor Forward promises change in lofty generalities and then entrenches the status quo in its specifics. Its proposed bus lane network exemplifies this problem.

The report promises to "limit the addition of non-transit travel lanes" (p. 10) and recommends that the county "convert existing auto travel lanes to dedicated transit lanes" (p. 45). But a footnote on page 40 renders these words utterly meaningless: "Ultimate number of lanes and right-of-way width to be determined by traffic study."

Allowing a "traffic study" to determine the size and design of a city street -- let alone a transitway -- is the negation of sound planning. Traffic studies design roadways to avoid traffic congestion. This inherently privileges drivers over pedestrians and transit riders. Traffic jams in urban places are a sign of success; a downtown with no traffic backups is a failure. In a transit-oriented area, and especially along a transitway, streets must be designed primarily for walkability and only secondarily for the movement of private motor vehicles.

Another symptom of Corridor Forward's automobile-first orientation is the excessively wide transitway rights of way. Even "business district streets" are 100 to 136 feet wide -- wider than Wisconsin Avenue in downtown Bethesda. Wide multi-lane highways are a barrier to pedestrian movement.

A bus that stops along a 6-lane highway with traffic whizzing by at 40, 50, or 60 miles per hour will always be second-class transportation, with few riders other than those who can't drive or can't afford to drive. Bus lanes and fancy bus shelters will not fix that. Corridor Forward must amend existing master plans to make the transitways true transitways. That requires narrower rights of way, design speeds of 30 mph or less, elimination of plans to add lanes to existing highways, and a ban on slip lanes, extra right-turn lanes, and double turn lanes.

In one area, Corridor Forward does recognize and correct past mistakes. This is the alignment of the Corridor Cities Transitway. We support the plan's revision.

Conclusion

Just five months ago, the Planning Board passed judgment on past efforts to make the upcounty transit-oriented. These words were included in the Great Seneca Science Corridor Minor Master Plan Amendment:

Development has not achieved the urban style form envisioned; the form of the built environment remains relatively unchanged. New development, although it employs best design practices like high quality construction materials and infill redevelopment of surface parking lots, remains primarily suburban and auto-centric in form.

Corridor Forward, as now written, perpetuates the bad choices that caused this failure. It pushes expansion of rail transit off into the indefinite future by ruling out any added MARC train service. And it envisions buses as a second-class form of transportation, fated to carry a disadvantaged minority of travelers. The upcounty needs a much more ambitious transit plan, centered on all-day MARC service.

I oppose the current Corridor Forward Plan for the reasons explained herein. The only element of the plan that I support is the Corridor Cities Transitway alignment.

I respectfully offer this testimony in context with my forty years of transportation engineering experience, and my pro bono service in the Montgomery County Transportation Policy Task Force from 2000 to 2002.

Rodolfo Pérez, P.E.

The Corridor Forward Plan equivocally recommends a Red Line Extension instead of improving MARC Rail.

The plan concludes that in the long-term, the only cost-effective solution is to extend the Metro Red Line to Germantown. The analysis supporting this conclusion is flawed, and lacks an objective comparison with MARC improvements which have been in the books for many years. The cost for the MARC improvements is \$1.403 billion, while the costs of the recommended Red Line Extension is \$1.826 billion (30% more).

For example, the plan created benefit-to-cost ratios (BCR) that favored the Red Line Extension with a methodology different from the Federal Transit Administration (FTA) cost guidelines. This raises questions because the Red Line had the highest BCR of the transit options but *without accounting* for such costs as right-of-way, operations, and maintenance facilities. This methodology is also problematic because any Metro extension will depend on a federal Full Funding Grant Agreement that requires full adherence to FTA guidelines.

The plan incorrectly asserts that extending 7 miles of the Red Line at a cost of \$1.7 billion, is a better investment than improving 45.8 miles of track and associated infrastructure for MARC at the lower cost of \$1.3 billion.

The plan justifies spending \$115.5 million for 42 additional railcars for the Red Line Extension, over the lower cost of \$79.9 million for 9 locomotives and 39 railcars for MARC. The plan also assumes that the Red Line would yield higher ridership and better regional benefits. These assumptions are improbable due to the following challenges:

- The Metro Extension requires complex grade separations, 20 acres of right of way to meet rail safety requirements, and 70 acres of land for operations and maintenance facilities with costs not included in the estimates above.

- Washington Metro is reluctant to build new extensions because Metro is focused on bringing its built network back to a state of good repair, and has far more pressing safety and capacity needs to address.
- The purported ridership gains are moot considering the decades that it would take to build an expensive extension facing these challenges.

In contrast, the planned MARC improvements can start immediately as these only require agreement between CSX and the state to add train service in return for public investments in track capacity.

All-day, two-way, seven-day MARC service would connect walkable communities along the whole length of the line, including Silver Spring, Kensington, Rockville, Gaithersburg, Germantown, Frederick, Brunswick, and Harper's Ferry.

With seven stations north of Germantown, the MARC provides more regional travel benefits than an uncertain 7 mile Metro extension. The MARC already carries 95% of commuting trips, offers 70% of its passengers easy driving access to the stations, and connects to over 1.3 million jobs within a 30-minute walk or transit trip to the stations.

The Corridor Forward Plan contradicts the goals of the Maryland-National Capital Park and Planning Commission, and relies on dubious promises.

The M-NCPPC has been on the record for pursuing the comparative (not separate) study of transportation alternatives, and pursuing the goal of less auto-centric communities along the I-270 corridor. The Corridor Forward Plan is contrarian to those goals and entrenches the status quo by depending on highway toll revenues.

In the Frequently Asked Questions portal of the Corridor Forward Plan, its authors say that the plan does not propose transit alternatives to the Toll Lanes Project, and will not compare the potential of transit with highway projects as these are studied separately. The authors add that the Corridor Forward recommendations (likely to be completed before the toll lanes construction) *may be a reference to future negotiations to potentially direct toll revenues to either build transit facilities or to pay lump sums to the impacted jurisdictions.*

Such empty promises make the Corridor Plan a pro forma exercise contingent to future negotiations, and contradict the goals that M-NCPPC stated in its non-concurrence with the Toll Lanes Project. The M-NCPPC unequivocally stated that the Toll Lanes Project lacks specific, binding, and adequate multi-modal and transit elements (like MARC rail improvements) essential for reducing the need for additional road capacity. Further, the

M-NCPPC considered the TransUrban \$300 million contribution and other proposals for running buses on the toll lanes as simply inadequate tokens.

President Biden's ambitious infrastructure plan includes far more tangible funding for transit than the aleatory crumbs that this plan promises. For example, the FTA announced this month that \$5 billion in transit formula funding is available to transit agencies and states to support public transportation, and public transportation jobs throughout the county.

EISINGER TESTIMONY 2/15/22, MNCPPC 270 Corridor Forward Report, COUNTY COUNCIL HEARING

The introduction to the Original October 7th Planning Staff Report indicated that the purpose of the Corridor Forward plan was to look at the transportation network extending through the County between points north to the city of Frederick and south to DC and Northern Virginia. Unfortunately, thru later modifications the study falls far short of its original objective. Regarding the BRT elements it is now a near term recommendation with limited lifespan, with the metro extension: in an ain't never going to happen time frame.

I am here addressing the 270 issues, not to discuss whether someone can classify a bus as a BRT when it is merged with traffic, so enough said on that. In its phasing, the plan recommends 1) extending the Metro Red Line on the MARC rail track to Germantown and no further, staying inside the County and 2) increasing service on the MARC rail train, which has a very limited connection to Frederick. Metro would require the cooperation of the surrounding government entities that compose WMATA and would take years as well as negotiating with CSX, which has been historically impossible. Increasing passenger capacity on MARC So, it proposes extending metro, which currently cannot even keep 50% of its fleet in service due to fatigue of the metal wheels, since it so old now and antiquated, and essentially putting direct pressure on the Ag Preserve to keep funneling commuters through it at an ever-increasing

rate with possible new stations that could require road improvements in the Ag Preserve.

I established The High Road Foundation to not just protect the Ag Preserve from the neglect demonstrated by the planners but also to protect the Economic Base of the County, by modernizing our transportation system to Frederick and Northern Virginia, make it cost effective, make it environmentally sound, and get unnecessary single passenger automobiles off the roads and prevent further expansion of our asphalt impacting the MS4 program and our pocketbooks:: and here is how:

Existing publicly owned transportation corridors have the capacity to accommodate additional transportation infrastructure so WHY NOT REUSE THEM? Selecting an elevated transit mode that will have a small footprint, that can be designed to avoid underground utility conflict, that can be constructed at night on land already in the public domain, in less time, and with less risk at less expensive accomplishes this goal: We are talking about a transit mode that has technologically come into its own in the last 10 years, just like electric cars have: An elevated Monorail. It is not Disneyland, and it is not Homer Simpson, so our planners need to wake up.

A recent MDOT study concluded Monorail is viable, its construction costs per mile are comparable to light rail, while carrying five times the number of passengers as Light rail and costs one quarter the cost of an extension of Metro while carrying the same amount of passengers as a metro.

Per passenger carried, Monorail is 5 times cheaper than light rail, and 4 times cheaper than metro.

The Foundation has done preliminary civil engineering, ridership and economic impact studies for a multi-leg monorail network over existing public rights-of-ways in and thru the County connecting outside jurisdictions:

And guess what:

- The public owns 98% of the land required. No land acquisition costs required and no one to approve it or disapprove it. We own the ground. No delay to acquire the ground, and the NEPA studies are essentially already done.
- This system is completely grade separated and does not interfere with existing bikes, pedestrians, automobiles, or wildlife, i.e no roadkill, and is 100% safer than on grade transit,
 - It can be constructed off site and erected at night to remove existing traffic impacts during construction
 - It has a very small footprint and fits in the existing rights of ways dodging utility relocation costs and shedding very very little storm water into our streams
 - The structural system of a monorail has a life span of 100 years, and the propulsion is electric. The cars even last longer than light rail systems or metro.
- By Limiting the contingency of land acquisition, the element that blew up the Purple Line budget, you can determine construction cost with 95% certainty.

There is no other transit mode that offers these benefits. Keeping the northern transit corridor in the

existing 270 right of way is the only solution that takes pressure off the AG Preserve, gives us a transit mode carrot to attract employers to the county and fulfills the original goal of the Study.

Thank you for your time.

10.0	Guideway, Track, and Structures				
10.01	Guideway				
10.011	At-Grade	2020	LF	\$	3,252
10.012	Aerial	2020	LF	\$	15,354
10.013	Tunnel - Single Track	2020	LF	\$	27,789
10.014	Tunnel - Double Track	2020	LF	\$	67,530
10.02	Track				
10.021	Ballasted	2020	TF	\$	1,335
10.022	Direct Fixation	2020	TF	\$	1,028
10.031	Single Crossover (#15 Turnouts) Tunnel	2020	Each	\$	11,381,683
10.032	Single Crossover (#15 Turnouts) Aerial	2020	Each	\$	6,693,399
10.033	Single Crossover (#15 Turnouts) At-Grade	2020	Each	\$	1,771,193
20.0	Stations, Stops, Terminal, Intermodal				
20.01	At-Grade Station				
20.011	New At-Grade Station or Retained Cut/Fill, Full	2020	Each	\$	80,000,000
20.012	New Mined Tunnel Station - Simple, Full	2020	Each	\$	300,000,000
20.013	New Mined Tunnel Station - Complex, Full	2020	Each	\$	800,000,000
20.014	New Elevated Station, Full	2020	Each	\$	120,000,000
-	-	2020	-		-
30.0	Support Facilities: Yards, Shops, Administration Buildings				
30.03	-				
30.061	Silver Line Phase 2 Yard and Facilities Improvements	2020	Each	\$	90,000,000
-	-	2020	-		-
40.0	Sitework and Special Conditions				
40.08	Site Utilities				
40.081	Miscellaneous Utility Relocation	2020	LF		51
40.09	Site Preparation				
40.091	Erosion and Sediment Control, Stormwater Management, Landscaping, Mai	2020	LF		14
-	-	2020	-		-
50.0	Systems				
50.02	Train Control and Signal System				
50.021	Signal system, train control, allocated TCR cost	2020	LF		1146
50.02	Train Control and Signal System				
50.051	Communications infrastructure	2020	LF		159
50.02	Train Control and Signal System				
50.061	Traction power, third rail, insulator, and allocated TPSS/TBS	2020	LF		3874
Construction Subtotal					
60.0	ROW, Land, Existing Improvements				
60.01	ROW				
60.011	Purchase of Land	2020	Percentage		0.02
-	-	2020	-		-
70.0	Vehicles				
70.01	Heavy Rail Vehicle				
70.011	Heavy Rail Vehicle - Rail Cars	2020	Each		2524896
-	-	2020	-		-
80.0	Professional Services				
<i>Applies to Construction Subtotal (SCC 10-50)</i>					
80.011	Preliminary Engineering/NEPA	2020	Percentage		0.04
80.021	Final Design	2020	Percentage		0.08
80.031	Project Management for Design and Construction	2020	Percentage		0.1
80.041	Construction Administration & Management	2020	Percentage		0.075
80.051	Professional Liability and other Non-Construction Insurance	2020	Percentage		0.02
80.061	Legal; Permits; Review Fees by other agencies, cities, etc.	2020	Percentage		0.02
80.071	Surveys, Testing, Investigation, Inspection	2020	Percentage		0.02
80.081	Start up	2020	Percentage		0.01
-	-	2020	-		-
90.0	Contingency				
90.01	Unallocated				
90.011	Unallocated, General	2020	Percentage		0.25
-	-	2020	-		-
100.0	Finance Charges				
Total Cost					
Total Cost per Mile					

Mode	Criteria	Metric	Thresholds		
			Low	Medium	High
Suburban Metrorail	Density	Households per Acre	<12	12-18	>18
		Employment per Acre	<19	19-26	>26
	Ridership	Ridership per Mile	<3,500	3,500-7,000	>7,000
	Built Environment	WMATA Walkshed Rating	<50%	50%-65%	>65%
Urban Metrorail	Density	Households per Acre	<15	15-20	>20
		Employment per Acre	<75	75-150	>150
	Ridership	Ridership per Mile	<7,000	7,000-20,000	>20,000
	Built Environment	WMATA Walkshed Rating	<65%	65%-75%	75%
Light Rail	Density	Households per Acre	<2	2-5	>5
		Employment per Acre	<6	6-13	>13
	Ridership	Ridership per Mile	<2,500	2,500-3,500	>3,500
	Built Environment	WMATA Walkshed Rating	<50%	50%-70%	>70%
Bus Rapid Transit	Density	Households per Acre	<2	2-5	>5
		Employment per Acre	<6	6-13	>13
	Ridership	Ridership per Mile	<1,000	1,000-2,000	>2,000
	Built Environment	WMATA Walkshed Rating	<50%	50%-70%	>70%
Streetcar	Density	Households per Acre	<2	2-5	>5
		Employment per Acre	<4	4-11	>11
	Ridership	Ridership per Mile	<1,500	1,500-2,500	>2,500
	Built Environment	WMATA Walkshed Rating	<50%	50%-70%	>70%
Commuter Rail	Density	Households per Acre	<1	1-2	>2
		Employment per Acre	N/A	N/A	N/A
	Ridership	Ridership per Mile	<80	80-90	>90
	Built Environment	WMATA Walkshed Rating	N/A	N/A	N/A
Limited-Stop Bus	Density	Households per Acre	<1	1-2	>2
		Employment per Acre	<4	4-11	>11
	Ridership	Ridership per Mile	<1,000	1,000-2,000	>2,000
	Built Environment	WMATA Walkshed Rating	(29) <50%	50%-70%	>70%

Figure 14. Managed Lanes Enhanced Commuter Bus Illustrative Service Diagram

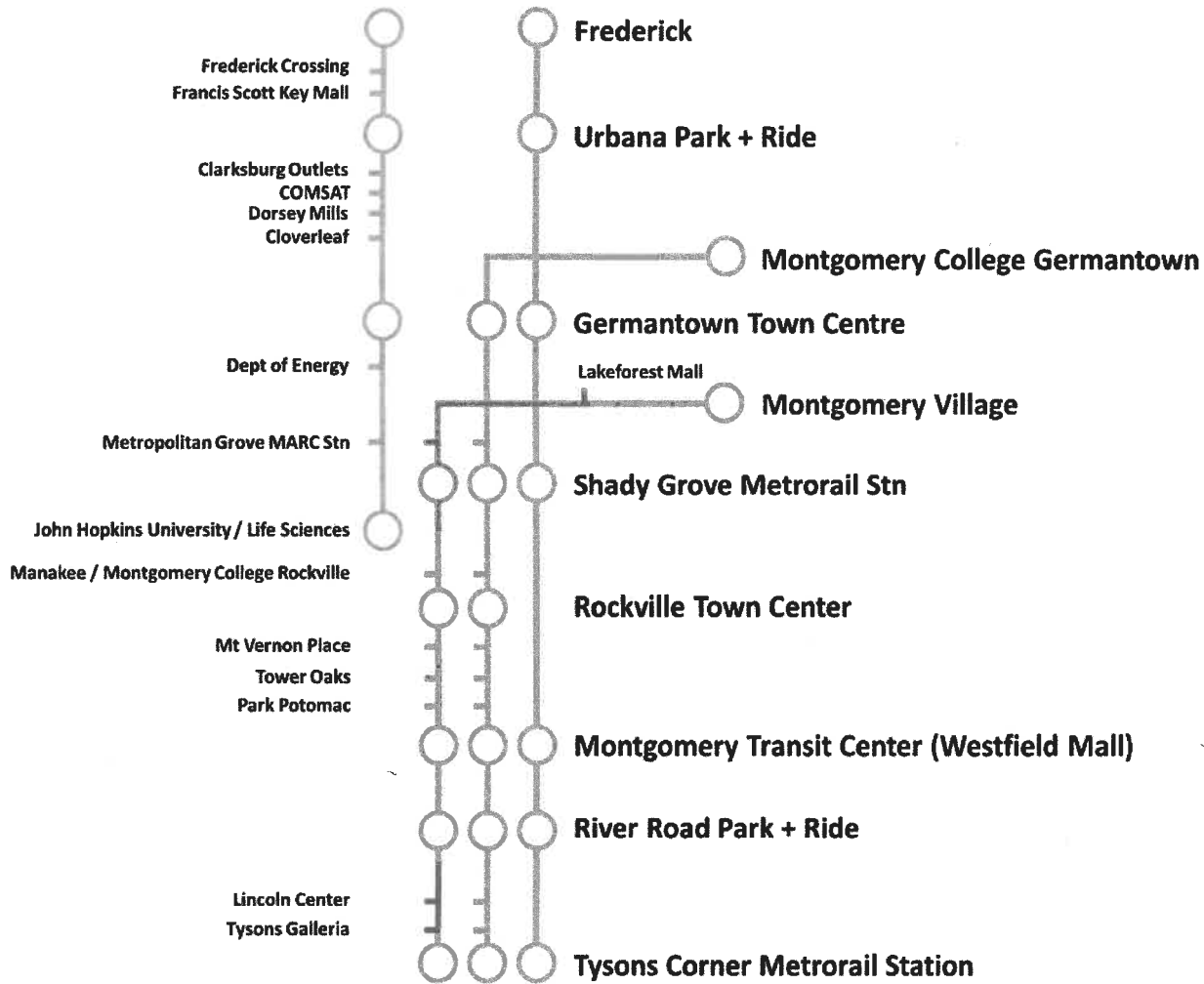


Table 26. Managed Lanes Enhanced Commuter Bus Service Patterns and Headways

Station	Pattern A: Downtown Frederick to Life Sciences Center	Pattern B: Montgomery College Germantown to Tysons	Pattern B: Montgomery Village to Tysons	Pattern D: Frederick to Tysons Express	AM Headway (min)	AM Trips / Hr	PM Headway (min)	PM Trips / Hr
Downtown Frederick	A			D	15	4	30	2
Frederick Crossing	A				30	2	60	1
Francis Scott Key Mall	A				30	2	60	1
Urbana Park and Ride	A			D	15	4	30	2
Clarksburg Outlets	A				30	2	60	1
COMSAT	A				30	2	60	1
Dorsey Mills	A				30	2	60	1
Cloverleaf	A				30	2	60	1
Montgomery College Germantown		B			15	4	30	2
Germantown Town Center	A	B		D	7.5	8	15	4
Dept of Energy	A				30	2	60	1
Montgomery Village			C		15	4	30	2
Lakeforest Mall			C		15	4	30	2
Metropolitan Grove Station	A	B	C		6	10	12	5
Shady Grove Metrorail Station		B	C	D	6	10	12	5
Life Science Centre / JHU	A				30	2	60	1
Manakee/Montgomery College Rockville		B	C		7.5	8	15	4
Rockville Town Center		B	C		7.5	8	15	4
Mt Vernon Place		B	C		7.5	8	15	4
Tower Oaks		B	C		7.5	8	15	4
Park Potomac		B	C		7.5	8	15	4
Montgomery Transit Centre (Westfield Mall)		B	C	D	6	10	12	5
River Road Park + Ride		B	C	D	6	10	12	5
Lincoln Centre		B	C		7.5	8	15	4
Tysons Galleria		B	C		7.5	8	15	4
Tysons Metrorail Station		B	C	D	6	10	12	5

T&E COMMITTEE #2
February 28, 2022

MEMORANDUM

February 26, 2022

TO: Transportation and Environment (T&E) Committee

FROM: Glenn Orlin, Senior Analyst

SUBJECT: **Addendum** - Response to Planning Chair's critique of Council staff's February 23 report on the Corridor Forward Plan¹

PURPOSE: Worksession

On February 23, Council staff circulated a report on the Corridor Forward Plan in advance of the T&E Committee's February 28 worksession. During the evening of February 25, the Planning Board Chair's critique of the staff report was sent to Committee members and Council staff (pages 1-4). This Addendum is intended to share the Chair's critique more widely, and for Council staff to respond to his points of disagreement.

Great Seneca Transit Network (GSTN). The GSTN is a future network of six enhanced bus routes connecting the Great Seneca Science Corridor to the Red Line stations at Rockville and Shady Grove. The Council has budgeted two of the six routes (the "Pink" and "Lime" lines) at a cost of \$12.1 million to be completed and operational in the next two years. According to the project description in the CIP, "The project includes new, upgraded transit stations, *dedicated bus and bus+bike lanes*, transit signal priority, new roadway connections, upgrades to transit centers, as well as pedestrian and bicycle improvements" (*emphasis mine*).

The Chair claims the staff report mischaracterizes the GSTN by saying it would provide "nearly the same service" as the Corridor Cities Transitway (CCT). (See the second to last paragraph on page 2.) The initial two routes in the GSTN will have 1.75 miles of dedicated bus lanes, and the remaining routes will have 2.0 miles of dedicated bus lanes and queue jumps at several intersections, so the GSTN will have a higher level of transit service than, say, the Ride On Express on MD 355 or even the current FLASH service on US 29. While the master-planned CCT would provide a higher level of service along its route due to it being a continuous dedicated busway, it would still only be one route, not the six envisioned in the GSTN. So, Council staff stands by the statement that the GSTN would provide "nearly the same service" as the CCT.

The Chair infers from this statement that Council staff is characterizing the GSTN to be nearly comparable to the Corridor Connector concept. That is not what the staff report says. Indeed, Council

¹ Key words: #CorridorForward, plus search terms I-270, transit, Metrorail, monorail, bus rapid transit, MARC

staff wholly endorses the Corridor Connector concept because it would create a broader network of dedicated bus lanes than either the CCT or the GSTN.

The need for Phase 1 facility planning first. The Chair objects to Council staff’s proposal that, while the Corridor Connector concept should be endorsed, particular routes should not be included the plan until Phase 1 facility planning is completed. (See the paragraphs starting at the bottom of page 2.)

First, a reminder about the two phases of facility planning is in order. The first—the feasibility phase—is when alternatives are evaluated through various general metrics, including travel service for all users. At the end of the first phase a particular alternative is selected, and the project proceeds to the second phase—preliminary engineering—which is when community and environmental impacts are documented, and when the details of the project’s scope are so well defined that a fairly accurate capital cost can be estimated. Typically, the two phases take four years to complete, and for complex projects the process can take five or even six years.

In prior master and sector plans, including the 2013 Countywide Transit Corridors Functional Master Plan (commonly referred to as the BRT Plan), considerable time and expense was spent modeling traffic impacts, prior to the Planning staff—and ultimately the Board—making recommendations regarding cross sections, for road segments and intersections before recommendations were made in the plan. According to Planning staff, while the regional model was used to develop general metrics, there were not sufficient resources available to model the traffic impact of the options studied under Corridor Forward. Certainly, this is a major reason why the Plan is vague for each proposed Corridor Connector whether its dedicated bus lanes should be added to its cross-section or repurposed from existing lanes.

Furthermore, as the staff reports notes, considerable doubt has been raised by the Executive/DOT, the City of Gaithersburg, and Council staff that the six particular Connectors comprise the best network. All suggest that some of the dedicated CCT right-of-way might be used, and that some other existing or planned roads might supplant some of—or add to—the network proposed by the Planning Board. A comprehensive Phase 1 facility planning study would get to these answers. It is quite conceivable that the result would be a network of dedicated lanes *greater* than proposed by Corridor Forward. And since the Planning Board acknowledges that facility planning must occur before a project can proceed, then what is the real problem with conducting the Phase 1 study now?

The Chair avers that “The Corridor Forward master plan should come before detailed planning and design of specific facilities, not the other way around.” Council staff concurs. Phase 1 facility planning is neither detailed planning (that’s Phase 2) nor design. Phase 1 facility planning will provide the data that the Planning staff normally would have used for its analysis if it had had the time and resources to do so. Traffic impact may no longer be a consideration Downcounty (where congestion standard is in the “failure” range) or around Metro Stations (where there are no limits on allowable congestion), but most of these Connectors will lie in Upcounty areas where driving will continue to be the predominant mode of travel, even with better transit options. Even with the aggressive policies to promote transit and other non-auto-driver modes, the long-term Non-Auto-Driver Mode Share (NADMS) goals in the Great Seneca Science Corridor, Germantown, and Clarksburg are less than 30%, which means that more than 70% will be driving.

Red Line extension. Starting on page 3, the Chair enumerates the arguments for Metrorail that are made in Corridor Forward. Council staff does not challenge the conclusion that a theoretical Metrorail extension exhibits better service metrics than the alternatives studied. Council staff does challenge its viability due to its capital cost and impacts (both considerably underestimated), the improbability that it would ever be eligible for Federal aid, or gain support even from WMATA itself, given its priorities to put the system in a state of good repair and to construct more than \$5 billion (in 2018 dollars) in core improvements in and near Downtown DC.

The Chair notes that the Red Line extension would serve people where they live and work. But the other modes studied have nearly equal or better connections to where people live and work.

- Like the Red Line extension, MARC stops at Olde Towne Gaithersburg and Metropolitan Grove (Gaithersburg's choice over MD 124, if it were built) already; although it doesn't stop in the Germantown Town Center, it is but a short walk or bus trip away, and it has the potential for much more park-and-ride, as per the recently approved MARC Communities Plan.
- The proposed monorail line has planned stops along at two of the exact same locations as the Red Line extension: Metropolitan Grove (as proposed by Gaithersburg) and Germantown Town Center. It does not have a planned stop in Olde Towne Gaithersburg (which is not slated for significant additional development), but it would stop at the Clarksburg Town Center, which the Red Line extension would not reach. Nor would the Red Line reach the Urbana or Frederick City activity centers that monorail would.
- The express bus service on the Opportunity Lanes would certainly be routed to serve the Metropolitan Grove and Germantown Centers, as well as the Clarksburg Town Center and potentially others in both Montgomery and Frederick Counties.



MEMORANDUM

TO: Montgomery County Council - Transportation and Environment Committee

FROM: Casey Anderson, Chair, Montgomery County Planning Board

SUBJECT: Corridor Forward: The I-270 Transit Plan

DATE: February 25, 2022

Introduction – Why Do the Corridor Forward Plan?

After several decades of population and employment growth along the I-270 corridor, there is strong interest in sustainable transit to move people among home, work, and leisure activities. But the county cannot realistically fund and operate all the proposed transit opportunities currently in the public dialogue – and together they do not add up to a network that matches the county’s needs.

In an environment of limited funding to meet multiple competing objectives, it is imperative **to prioritize the county’s options**. As directed by the Montgomery County Council, Corridor Forward: The I-270 Transit Plan, provides a set of recommendations to help guide the County Council in setting these priorities. The Plan identifies projects and supporting recommendations that **balance pragmatism with vision, and they aim to advance the county’s longstanding land use and transportation goals while ensuring that new investment also advances equity objectives**.

Corridor Forward includes the following priority projects in the proposed transit network:

- First Priority: MD 355 and Veirs Mill Road Bus Rapid Transit (BRT) projects.
- Second Priority: The Corridor Connectors, which re-envision the Corridor Cities Transitway (CCT) as a series of dedicated bus lanes that connect corridor communities to each other and to the county’s existing and planned rapid transit network.
- Third Priority: Red Line extension, prioritizing access to Germantown Town Center.

In addition to the proposed network, the Plan includes several recommendations to support the proposed network and strengthen regional transit connectivity.

Serving Local Transit Needs – Reimagining the CCT

The County Council directed the Planning Board to examine the alignment of the Corridor Cities Transitway, as the project has been planned for many years but not implemented. In the February 23 memo, Council staff notes **that “the CCT route has always been a somewhat dubious one” and**

that the “CCT was never a viable option for Germantown and Clarksburg commuters attempting to reach the Shady Grove Metro.” The Planning Board agrees with this assessment, and as a result, has re-envisioned the CCT as the Corridor Connectors for the following reasons:

- **The CCT as previously conceived would be extremely difficult and expensive to build – the proposed Corridor Connectors provide a much more feasible, buildable alternative.** The Corridor Connectors remove several costly elements of the CCT, including two grade-separated features (an interchange and an overpass) as well as a three-mile CCT segment through State Department of Forest Land with no residential or commercial development between Metropolitan Grove and Germantown. Communities along the I-270 corridor have been promised high-quality transit for decades, and the Corridor Connectors would be easier and more likely to be built.
- **The Corridor Connectors serve more destinations more effectively than the CCT and expand the county’s bus rapid transit network.** As a network of dedicated bus lanes, the Corridor Connectors offer the potential for one-seat transit rides that utilize both the Corridor Connectors themselves as well as the infrastructure associated with the MD 355 and Veirs Mill Road BRTs. **The Corridor Connectors expand the reach of these BRT routes**, extending their connections to Bethesda, Germantown, and Wheaton to residents and employees of the Life Sciences Center, Montgomery Village, and other activity centers along the corridor.
- **The Corridor Connectors provide high-quality transit to Montgomery Village.** While many of the same communities that were to be served by the CCT are also served by the Corridor Connectors, the Corridor Connectors provide **dedicated bus lanes along Montgomery Village Avenue to Montgomery Village, an Equity Focus Area**. The Montgomery Village Connector provides an opportunity to directly connect residents of Montgomery Village to the Red Line, as well as to employment and activity centers up and down the I-270 corridor.

In addition, the Corridor Connectors **complement the Great Seneca Transit Network (GSTN)**. Council staff notes that “nearly the same service” as the CCT would be provided by the GSTN, but this characterization mistakes the purpose of the GSTN. MCDOT presentations on the GSTN continue to identify opportunities for enhanced traditional bus service. The Corridor Connectors are transit running in dedicated lanes and this network is much more in line with the ultimate objective of high-quality transit service that competes with travel by automobile. While the GSTN will enhance transit within the Great Seneca Science Corridor, more robust infrastructure – such as the Corridor Connectors – is needed to realize the potential for transit as an alternative to driving and as a magnet for investment along each route.

The Corridor Forward master plan should come before detailed planning and design of specific facilities, not the other way around. Council staff recommends excluding specific routes for dedicated lanes in Corridor Forward prior to facility planning, but **this recommendation put the cart before the horse, because it calls for master planned routes to be changed only after MCDOT has finished designing the facilities that will use the routes**. Montgomery County has **never undertaken facility planning for a transit project that is not in a master plan, and for good reason**: master plans are intended to establish the general alignment of a transit project, while **detailed work on the facilities to be constructed follows the master plan**.

The logic of the Council staff’s recommendation would have called for MCDOT to design BRT routes and bike lanes before adopting the 2013 Countywide Transit Corridors Functional Master Plan and the 2018 Bicycle Master Plan. The minimum rights of way provided in Corridor Forward for the Corridor Connectors allow flexibility for the future facility planning of each segment of infrastructure as well as for implementation through the development review process. The Planning Board acknowledges that master-planned alignments, station locations, and the provision of dedicated bus lanes may be adjusted through facility planning, as facility planning includes a more detailed analysis, but this does not mean that facilities should be designed before the master plan.

Serving Regional Transit Needs – Extending the Red Line

Corridor Forward evaluated several transit options that would serve regional needs, including a Red Line extension to Germantown, improvements to MARC rail, commuter bus along I-270, and a monorail or light rail connection to Frederick. While supporting recommendations in the Plan acknowledge the merits of the other studied modes, the Red Line extension to Germantown is included in the proposed transit network for the following reasons:

- **The Red Line extension better serves the needs of Montgomery County residents.** Most Montgomery County residents work in Montgomery County or the District of Columbia. The Red Line extension provides high-quality transit option for commuters to Rockville, White Flint, and Bethesda, as well as job centers in DC. Connections to Frederick County afforded by MARC, monorail, and commuter bus would provide a greater benefit to Frederick County residents than Montgomery County residents. We should work towards a land use and transportation vision that encourages people to live, work, and play in Montgomery County.
- **The Red Line extension shortens commutes, has more riders, links Equity Focus Areas to jobs, and is the best for the environment.** Relative to the other studied options, the Red Line resulted in the greatest reduction in transit commute times, the highest number of new transit riders, the greatest reduction in vehicle miles traveled, and the largest job accessibility benefit for residents of Equity Focus Areas. While a Red Line extension would face implementation hurdles, improved MARC service and other alternatives also face high costs and implementation challenges. Investing in a Red Line extension acknowledges that this service is the best opportunity to meet the county’s mobility, economic, environmental, and equity goals.
- **The Red Line extension supports existing and planned development.** Germantown has almost 100,000 people – more than Rockville or Gaithersburg – and saw its density increase by over 2,000 people per square mile in the past 25 years. Connecting Germantown to the Metrorail system provides this growing activity center a frequent, direct connection to Bethesda and the center of Washington, DC - areas with high concentrations of jobs, services, and amenities. Existing and planned density along the Red Line extension exceeds that for the MARC, monorail, and commuter rail options. In addition, Metrorail is the mode most suited to advancing transit-oriented development along the corridor.

- **The Red Line Extension serves people where they live and work.** Through a Red Line extension with stops in activity centers, passengers can reach high-quality transit not only by driving, but also by walking and bicycling. Transit that has stops along the interstate, such as monorail, requires an additional trip from homes or jobs to a stop along a highway, that would be difficult for pedestrians or bicyclists to access.

Corridor Forward acknowledges the magnitude of coordination, stakeholder buy-in, and resources that will be necessary to achieve the Red Line extension and details several actions to advance this long-term vision. The Plan does not assume that the Red Line extension will be constructed and operational over the Plan's horizon, but rather that steps will be taken to deliver it over the long term.