

**"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.