

July 8, 2025

Montgomery County Council
100 Maryland Ave
Rockville, MD 20850

Re: Master Plan of Highways and Transitways (MPOHT) – 2025 Technical Update

Dear Council President Stewart and members of the County Council:

Please accept these comments on behalf of the Coalition for Smarter Growth. CSG is the leading organization in the D.C. metro region advocating for walkable, inclusive, transit-oriented communities as the most sustainable and equitable way for our region to grow and provide opportunities for all.

We urge you to adopt the recommendations of the Planning Board and **remove the unbuilt northern portion of M-83 from the Master Plan of Highways and Transitways.**

M-83 is not the right path forward to provide better transportation options upcounty. The ways of thinking that informed plans for this road decades ago are fundamentally out of step with what we know today about best practices to address transportation needs, and about the vital connections between environmental health, climate resilience, and human health.

The county is well on its way to implementing a much more effective mix of bus rapid transit and local street safety improvements that, per the county's [2017 supplemental report](#), will reduce vehicle miles traveled, increase transit ridership, and reduce rush hour delays on MD 355.

The time is now to remove M-83 from our county's Master Plan of Highways and Transitways.

Sincerely,



Carrie Kisicki
Montgomery County Advocacy Manager

M-83 is based on obsolete travel and land use assumptions

[SHA traffic data](#) shows that **traffic volumes on most of the major north-south roads in the M-83 corridor have declined and did so even before the pandemic.** SHA had forecast 34-48%

growth in traffic volumes on MD 355 by 2030, but traffic volumes on 355 peaked in 2014 and 2017.

Other roads—MD 27, MD 124, MD 108, Clarksburg Rd/Stumptown Rd, Snowden Farm Parkway—haven't seen increases in traffic volumes according to SHA data. Since the pandemic, the vast increase in telecommuting and the huge vacancies in office park buildings are likely contributing to further declines in peak hour driving.

M-83 would generate higher volumes of traffic upcounty without providing lasting traffic relief

Too many communities seeking relief from traffic congestion have been sold the false promise that a new or expanded road can fix it. What we now know from study after study—including examples in our own region—is that **the temporary relief from traffic seemingly offered by new road capacity is eaten up within years** as more people decide to take more car trips because it has become more convenient to drive.

This is a phenomenon called [induced demand](#), and it eventually leads communities right back to the traffic problem they started with—as we saw in the 1990s after the state of Maryland spent \$200 million to expand I-270 from 8 to 12 lanes, only to see [traffic gridlock return in just 8 years](#).

Far from relieving traffic upcounty or providing alternative routes, **M-83 would be likely to encourage more driving trips overall while eventually experiencing just as much traffic as existing routes.**

M-83 would cause significant environmental damage to vital watersheds, stream valleys, and the climate

M-83 would not result in long-term, sustainable improvements to travel times and traffic congestion. It is, however, *highly* likely that building M-83 would result in **increased carbon emissions** from increased vehicle miles traveled, as the county's own modeling predicts. And it is a certainty that M-83 would cause **damage to sensitive ecosystems** it cuts through, including watersheds that feed into our regional drinking water supply.

As with the now well-documented phenomenon of induced demand, the connections between human and environmental health were perhaps not fully appreciated by decisionmakers decades ago when M-83 was originally planned. Now, we know better, and we need to act accordingly.

In 2024, our region experienced [extreme drought](#) and saw its [longest-ever recorded period with no precipitation](#). As climate change and extreme heat intensify, **we cannot take the health of the ecosystems that feed into our drinking water supply for granted.**

Likewise, we now know that the many byproducts of traveling by car, from auto emissions to microplastic particles produced by our tires, do not have a neutral impact on our health or on the environment. Rather, they cause negative health impacts like **increased rates of asthma for those living near roadways**, and contribute to the already-disastrous and mounting effects of climate change.

MD-355 BRT is a better alternative for improved upcounty transportation options – and already underway

There is a path forward to relieving transportation challenges upcounty without generating long-term negative environmental and health effects. The solution to upcounty transportation challenges lies in high-quality, high-capacity new transit connections; safer and more comfortable options to get around by walking and biking; and targeted intersection and street grid improvements to improve accessibility. These solutions provide a **sustainable long-term framework for relieving traffic** by offering **more and better transportation choices**.

Progress on these transportation alternatives is **no longer a hypothetical, but is well underway**. [Bus rapid transit \(BRT\) on MD-355](#) will provide a high-capacity, high-frequency bus line with service between Bethesda and Clarksburg. Its initial phase, which will provide service between Rockville and Germantown, is in the Environmental Review stage with final design projected to start next year and construction projected to start in 2028.

The County's [2017 supplemental report](#) on M-83 found that when it excluded the proposed M-83 highway from its analysis, and focused only on MD 355 BRT and improvements to existing intersections and roads, these **BRT-based scenarios excelled in producing the shortest rush hour travel times on MD 355**; the lowest number of vehicle miles traveled in private vehicles; and the highest percentage of people traveling by transit, among other key metrics. BRT with intersection improvements was **the only scenario studied that was projected to reduce, rather than increase, overall vehicle miles traveled**.

CSG has been and will continue to be a strong advocate not only for this BRT project, but more broadly for better bus service, transit-oriented development, safe streets for all users, and safer and more comfortable options for walking and biking upcounty.

We urge the County Council to move decisively forward by removing the unbuilt northern portion of M-83 from the MPOHT, and no longer keep alive in our county's plans an unbuilt and environmentally damaging highway proposal that offers false hope of traffic relief and distracts from better transportation options already underway.