

Montgomery County Department of Transportation

Response to the City of Gaithersburg Letter, Dated July 17, 2013
February 4, 2014

Comments on the Purpose and Need

1. Reduce existing and future congestion.

The document discusses the congestion on I-270 as a detriment to future economic growth; however, no data is provided to show how the various alternatives will impact I-270. While analysis of the alternatives is shown regarding congestion reductions on MD 355, the City would recommend that as part of any final environmental impact study (FEIS) modeling be restudied using current data. Based upon recent traffic counts initiated by the City, it appears that east/west traffic has been reduced significantly since 2011: Much of the data used in the MCS may no longer be accurate or reflect changing dynamics. Further, the study states MWCOG Regional Forecast Round 8.0 was used in the modeling. It is to be noted the current round is 8.2 with 8.3 to begin Fall 2013 and 9.0, Fall 2014. Lastly, the City supports the inclusion of a rapid transit vehicle (RTV) system as proposed in the County Executive's "Transit Task Force Report" and how such a system impacts the need for any expansion of M-83, Midcounty Highway as part of this study. While it is stated that the potential RTV system was not included because it is not funded or in the CLRP, continued references to an unplanned/unfunded possible connection to the ICC are made as a benefit to specific alternatives. This is not consistent.

Response: The focus of the MCS was placed on improving local roadways within the study area because of the existing shortcomings that are being experienced on the local roadways such as congestion, travel delays, high accident rates, inferior pedestrian/bicycle facilities and lack of mobility. While MCDOT recognizes the congestion on I-270 as another transportation concern, I-270 is a major state facility that is being studied separately by SHA.

The travel demand models that are used for developing traffic volume projections for facility planning studies are constantly being updated by MWCOG. MCDOT has monitored changes in the MWCOG model throughout the facility planning study process and has incorporated the updated model results into the study when deemed appropriate based on the magnitude of the changes. For example, when RK&K updated the analysis being used for the current study back in 2011, major changes in the planned land use in and around the study area had been proposed as part of the update to the Germantown Master Plan. As a result, RK&K incorporated the updated model results. We feel this model has provided an accurate estimate of future traffic growth and has enabled our team to develop an accurate analysis of future traffic operations for each of the alternatives. MCDOT will continue to monitor changes to the model and a decision will be made at the appropriate time whether observed changes warrant further updates. Lastly, the references to a more direct connection to the ICC reference the fact that Alternative 9 will provide a complete partially access controlled arterial from Clarksburg to the ICC via Shady Grove Road which will improve access to the ICC with or without the missing segment of the "ICC Connector". Also, the Transit Task Force report is an "aspirational" document that was never approved by the County Executive or County Council.

2. Improve vehicular safety.

The City questions the improvement to vehicular safety stated because the majority of conflict points, i.e. curb cuts on MD 355 remain regardless of alternative selected and further, as shown in the study, the City of Gaithersburg accident rates will be relatively unaffected regardless of alternative selected.

Response: Alternative 5 would be expected to have some minor improvements to vehicular safety within the City due to the removal of driveway entrances and installation of service roads in select locations. Alternative 9 would also provide a safer alternative travel route compared to MD 355 because the roadway has access controls that limit access to local roadway intersections. This partial access controlled roadway will benefit all users of the roadway whether they reside in Gaithersburg, Germantown, Clarksburg or other outlying areas. One of the other benefits of Alternative 9 is that it reduces traffic volumes on MD 355 which we would anticipate to have the effect of reducing congestion and improving safety throughout the MD 355 corridor, thus benefiting residents and businesses in the City who use the road.

3. Enhance the efficiency of the roadway network and improve the connections between economic centers.

The City has concerns regarding the claimed improvements to the roadway network. Some of the alternatives proposed may divert traffic to City streets not currently impacted. The economic centers discussed include the Life Sciences Center and businesses such as MedImmune-both well outside of the study area. Further, the City questions the proposed benefits of the "ladder configuration" discussed. It does not seem efficient that a driver would exit a congested I-270 to drive past MD 355 to join M-83, especially if the intended destination is anywhere but the Shady Grove Metro area. As to efficiency, the City notes that the travel time savings along MD 355 illustrated in Figure 3-12 at best equates to ± 8 minutes northbound (Alternative 8) and ± 10 minutes southbound (Alternative 9) during the peak hour; however, this savings is over an approximately 5 mile span and potentially unnoticeable by a driver not traversing the full 5 mile route. The City again questions the overall impacts of the alternatives for such a relatively small savings in drive time.

Response: The benefit of the ladder configuration that would be enhanced by providing another North/South route is that it gives people more options for accessing various destinations throughout the study area. If Alternative 9 is constructed, for instance, a person travelling north from Gaithersburg to Frederick (or vice versa) could use Midcounty Highway for a portion of the trip and then could access I-270 via Montgomery Village Avenue, Watkins Mill Road (with completion of the I-270 interchange), MD 118, Ridge Road, and/or Stringtown Road. Currently, that person would be forced to utilize Montgomery Village Avenue to access I-270 directly or to access via MD 355.

While the travel time numbers may not appear significant to some individuals, when you consider that these travel times affect tens of thousands of people each day, the cost savings in terms of productivity and quality of life issues are significant. Furthermore, travel time reduction is just one of several needs of the Mid-County Corridor Study project. Other benefits include travel safety, improved bicycle and pedestrian facilities, accommodation of planned growth, and mobility. Additionally, with the proposed improvements associated with Alternative 9, the opportunity will be created to provide access from Clarksburg to the I-95

Corridor without using MD 355, I-270 or I-495. This improved access would be even further enhanced with the future construction of a direct connection from the southern end of Mid County Highway to the ICC.

How each alternative satisfies the documented purpose and need and with what resultant impacts will be further documented in the PA/CM, and the Final EER will include a detailed discussion of the refined impact analysis and project outcome for the preferred alternative.

4. Accommodate planned land use and future growth.

For the City of Gaithersburg, many of the proposed alternatives conflict with City goals and Master Plan recommendations including not facilitating RTV on Frederick Avenue, losing passive open space, and potentially impacting current and future commercial properties and growth along Frederick Avenue. The study in fact states Alternative 5 would have the greatest potential for long-term indirect effects on businesses through changes in access attributable to the closure of existing entrances and the construction of service roads.

Response: We concur that some alternatives, such as Alternative 5, would impact properties along Frederick Avenue and would utilize right of way that could ultimately be utilized for the County's planned BRT system on MD 355. On the other hand, Alternative 9 would have the effect of reducing traffic volumes on MD 355. Consequently, we feel Alternative 9 could significantly enhance the ability to repurpose 2 of the existing 6 lanes on MD 355 for BRT as is outlined in the recently approved Countywide Transit Corridors Functional Master Plan (CTCFMP).

5. Provide bicycle and pedestrian connections.

The City's adopted 2009 Transportation Element identifies the deficiencies of the MD 355 bicycle/pedestrian facilities. The City believes none of the alternatives proposed address these issues. The bicycle/pedestrian facilities proposed would have little benefit to the City as it relates to MD 355 or connectivity for activity nodes within the City.

Response: As described in the Gaithersburg 2009 Transportation Master Plan Element, MD 355 has an existing shared use path and sidewalk within the City, north of Montgomery Village Avenue. Alternative 5 proposes to maintain the shared use path and sidewalk within the City limits. Along the alignment north of the City, Alternative 5 would construct continuous shared use path and sidewalks, enhancing pedestrian and bicycle connectivity to Gaithersburg.

6. Improve the quality of life.

The City has no comments regarding Homeland Security issues. As to improving quality of life, the study presented states this is accomplished through reduced commuting times and offering safer alternatives to congested local roads; however, as shown previously the City questions whether these claims are valid as it relates within our incorporated limits. While the quality of life may improve for Clarksburg and Germantown-at what cost to Gaithersburg?

Response: We believe that offering alternative travel routes with improved travel times, safety, pedestrian/bicycle facilities, and mobility benefit the residents of all the study area

corridor cities including Gaithersburg, Germantown and Clarksburg. In addition, the traffic volumes along portions of MD 355 and MD 124 within the city limits are projected to be lower under Alternative 4 Modified and Alternative 9, compared to Alternative 5, Alternative 8, and the No-Build Alternative. This reduction in traffic volumes under Alternatives 4 Modified and 9 will make it easier for city residents to access the residential and commercial areas along these roads without competing with as many drivers passing through from areas outside the city. These reductions in travel volumes on MD 355 should enhance the ability of the County to carry out the newly adopted CTCFMP and repurpose existing travel lanes for the planned BRT line.

Comments Related to Alternatives

Alternative 2:

The City can support Alternative 2, TSM/TDM methods. This alternative is shown in the MCS to alleviate congestion and improve drive times with minimal investment utilizing the existing infrastructure and public rights-of-way, coupled with new express bus service. While this alternative is stated to not substantially improve vehicular traffic safety or mobility; would not provide a new highway or additional lane capacity; and would not provide additional bicycle and pedestrian connections as opposed to other alternatives, the City as discussed has questioned these claims regardless. This alternative would have the least impact to natural resources, parks, and property while still providing relief on MD 355 within the City.

Response: Comment acknowledged and noted.

Alternative 5:

The City would like to re-emphasize our opposition to this alternative. The City of Gaithersburg has long expressed its opposition to any alternative that directs traffic onto MD 355, Frederick Avenue. The proposed improvements, such as services roads and MD 355 widening, seem more “theoretical” rather than feasible. The MCS acknowledges such improvements will involve property acquisitions and land use impacts conflicting with zoning approvals previously granted by the City. The City further questions whether there is consensus from State Highway Administration (SHA) regarding these proposed changes. The City would like to review SHA’s position on this alternative and Alternative 8. Again as stated, this alternative does not address the inclusion of a RTV system as proposed in the County Executive’s “Transit Task Force Report” and currently being studied.

Response: Comment acknowledged. We note again that the Transit Task Force report was a recommendation to the Executive with no legal standing, and it was never endorsed by the Executive or Council.

Alternative 8:

This City also opposes this alternative in that it includes the fundamental issues related to the previous alternative discussed, plus the impacts to Blohm Park opposed in Alternative 9. In order for this alternative to work a number of improvements are needed that cannot be made without impacting existing properties located within the City. Further, the City is opposed to adding any M-83 “thru” traffic to the local streets. We continue to express concerns on the true impacts to the

adjacent streets such as Russell Avenue and Christopher Avenue as well as the impacts to future redevelopment efforts in this vicinity. The study references M-83 as a northern Great Seneca Highway; however, it is the City's opinion that this type of traffic should not be directed onto the City streets in this area.

Response: Comment noted.

Alternative 9:

The City has long documented its concerns regarding the Master Plan Alignment and its impacts to the City's Blohm Park. This alternative would fundamentally change if not effectively destroy the form and function of this park. The passive, scenic park would no longer exist.

Response: Comment noted. MCDOT will continue to coordinate with City of Gaithersburg staff regarding mitigation needs for Blohm Park should the selected alternative impact the park. However, MCDOT would like to note that Blohm Park was designed and constructed well after the Master Plan Alignment was approved and adopted for the corridor, and the development of Blohm Park was completed with full disclosure of the long term planned right-of-way for the Midcounty Master Plan project.

- **Relocation of the gazebo structure.**

Response: As stated in MCDOT's May 17, 2012 letter, the MCDOT is committed to working with the City to relocate the gazebo and associated trail access to a mutually agreeable location, as desired by the City, if either Alternative 8 or 9 is selected.

- **Construction of parking to offset the loss of on-street parking with Alternative 8 or 9.**

Response: Neither Alternative 8 nor Alternative 9 would result in the displacement of on-street parking at Blohm Park. Impacted on-street parking would be replaced in-kind as part of the proposed improvements for either alternative.

- **An exchange of County-owned parkland adjoining the City's corporate limits to replace impacted park acreage.**

Response: MCDOT is committed to working with the City and MNCPPC to identify an equitable exchange of land or fair compensation to mitigate the impacts to Blohm Park.

- **Participation in constructing a repurposing of the park as an "active" amenity which could include design/build of a new skate park or similar type use.**

Response: With the exception of the area currently occupied by the gazebo and the circular trail leading to the gazebo, Blohm Park primarily consists of wetlands and floodplain.

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Repurposing the park for different uses is an action that should be undertaken solely by the City. Should the City move forward with this plan, MCDOT would be willing to work with the City to ensure safe and effective access could be provided from Watkins Mill Road.