



Committee: T&E
Committee Review: Completed
Staff: Glenn Orlin, Senior Analyst
Purpose: To make preliminary decisions – straw vote expected
Keywords: #I-270, transit

AGENDA ITEM #5
March 22, 2022
Worksession

SUBJECT

Corridor Forward: The I-270 Transit Plan

EXPECTED ATTENDEES

(See attached staff report.)

COUNCIL DECISION POINTS & COMMITTEE RECOMMENDATION

The Transportation and Environment Committee unanimously concurred with a network of Corridor Connectors developed by Planning, DOT, and Council staffs, shown on ©28-29 and ©31 of the staff report. The Committee also unanimously concurred with the summary of recommendations on ©30, with two minor text revisions.

SUMMARY OF KEY DISCUSSION POINTS

The first priority is to construct the MD 355 and Veirs Mill Road BRT lines. The next priority is to build out the network of Corridor Connector dedicated bus lanes. Progress on other alternatives (express bus service on I-270 using the Opportunity Lanes and their direct ramps, MARC system and station improvements, extending Metrorail, etc.) may be pursued, but not all will be completed in short- or medium-term.

This report contains:

Staff report
Staff report attachments

pages 1-4
© 1-31

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MEMORANDUM

March 17, 2022

TO: County Council

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 to review T&E Committee recommendations

Councilmembers: Please bring your copy of the Final Draft Plan to this worksession.
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The purpose of this worksession is for Councilmembers to review the Transportation and Environment (T&E) Committee's recommendations regarding the Final Draft Plan. Action on the Plan will be scheduled once a draft resolution has been prepared reflecting the Council's revisions to the Final Draft.

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)
Joana Conklin, RTS Development Manager, Department of General Services
Corey Pitts, Planning Section Manager, DOT

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 Final Draft recommended:

- 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](#)).

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.

Instead of a single-line CCT, therefore, the Final Draft calls for a series of “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.

Both the Executive and the City of Gaithersburg remarked that the Final Draft Corridor Connector network 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. The Connector system also does not include a route across the planned Dorsey Mill Road bridge, which is master-planned and programmed, and may be built a point where direct ramps to and from the Opportunity Lanes can be provided.

After a discussion of these issues during its February 28 worksession, the T&E Committee urged that Planning, DOT and Council staffs develop a consensus set of recommendations regarding the Corridor Connectors and the relative priorities of all the options studied. The results are shown on ©28-31. The consensus network combines most of the elements of the Final Draft's six proposed routes with many of the six routes in DOT's Great Seneca Science Corridor network, two of which are already programmed for construction by FY24.

T&E Committee recommendations (3-0): Concur with the staff consensus network described on ©28-29 and ©31. Also, concur with the staff consensus summary of recommendations on ©30, except to:

- **change the name of the last category to “Regional Opportunities”; and**
- **revise item “R” to read “Explore a direct transitway connection between the recommended WMATA Metrorail Red Line terminus and Frederick City.”**



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

MEMORANDUM

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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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 at 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

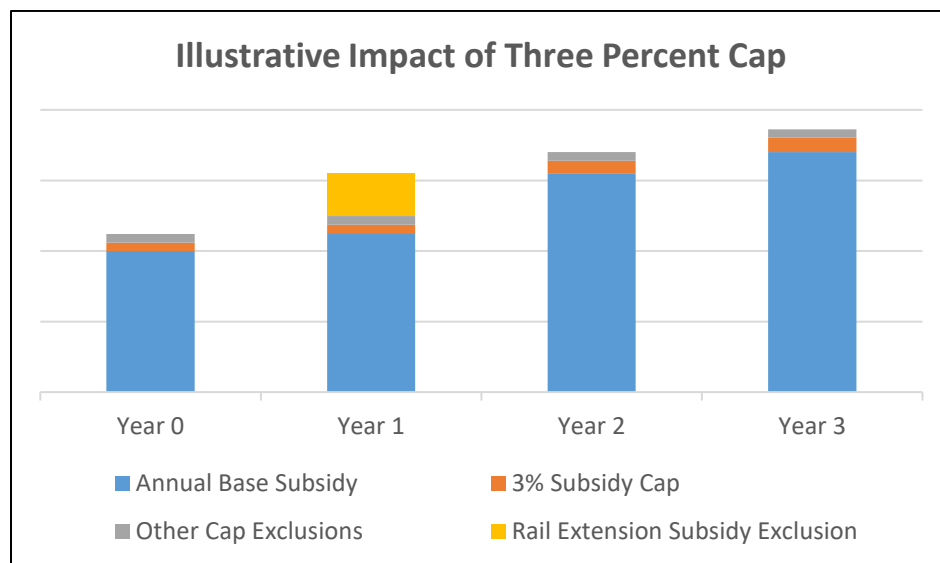
⁴ Metro's Transit Corridor Expansion Guidelines can be found here: <https://planitmetro.com/wp-content/uploads/2015/12/Task-5-Final-Report-2015-03-25.pdf>

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.

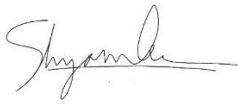


For example, as shown in the graphic above, operating subsidies resulting from the first year of operation for a Metrorail line extension would be exempt from the three percent cap. However, in every following year these resulting rail operating subsidies would become part of the baseline cap calculation. 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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CITY MANAGER
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:

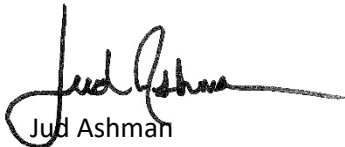
Expansion of the Metro Red Line is the ambitious long-term goal of the Plan. Specific concerns related to this recommendation include:

- 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,

A handwritten signature in black ink, appearing to read "Jud Ashman", with a long, sweeping horizontal line extending to the right.

Jud Ashman
Mayor
City of Gaithersburg



City of Rockville
111 Maryland Avenue
Rockville, Maryland
20850-2364
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240-314-5000
TTY 240-314-8137

February 15, 2022

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

Dear Council President Albornoz,

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.

MAYOR
Bridget Donnell Newton

COUNCIL
Monique Ashton
Beryl L. Feinberg
David Myles
Mark Pierzchala

CITY MANAGER
Robert DiSpirito

CITY CLERK/DIRECTOR OF
COUNCIL OPERATIONS
Sara Taylor-Ferrell

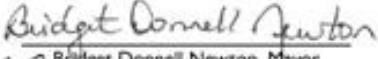


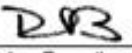
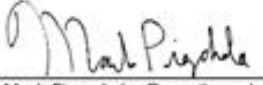
CORPORATE COUNSEL
Robert E. Dawson

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

910 Clopper Road, Suite 205N, Gaithersburg, Maryland 20878 (301) 840-1400, Fax (301) 963-3918

**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.

Follow Up to Planning Board, MCDOT, and Council Staff Discussion of Corridor Forward

The T&E Committee directed the Planning Board, MCDOT, and Council staff, to find consensus on the alignment of the Corridor Connectors and to reevaluate the prioritization of the options in the long-term vision.

Corridor Connectors:

- Overarching Rationale for changes
 - o Better alignment with the Great Seneca Transit Network
 - o Leverage CCT dedications
- Changes
 - o Update the Life Sciences Connector to include Redland Boulevard between MD 355 and Piccard Drive and Piccard Drive between Redland Boulevard and Gude Drive (instead of Gude Drive between MD 355 and Piccard Drive).
 - o Provide a more efficient connection between Rockville and the Life Sciences Center (than Redland Boulevard) by either Gude Drive or MD 28.
 - o Update the Life Sciences Connector to use Medical Center Drive between Falls Grove Boulevard and Great Seneca Highway (instead of continuing on Falls Grove Boulevard). Remove language discussing MD 28 as an alternative to Falls Grove Boulevard.
 - o Maintain the option for dedicated lanes on Medical Center Drive between Great Seneca Highway and Key West Avenue through the redevelopment of the Public Safety Training Academy (PSTA) site and from Belward Campus Drive to Muddy Branch Road through the redevelopment of the Belward site, consistent with the existing Corridor Cities Transitway alignment. The alignment for the Life Sciences Connector in this location should be determined through the facility planning process.
 - o Add a Corridor Connector between I-370 and the Life Sciences Center, along Fields Road, Decoverly Drive, and Broschart Road.
 - o Update the Great Seneca Connector to divert from MD 124 and instead use Clopper Road between MD 124 and Watkins Mill and then use Watkins Mill between Clopper Road and MD 355. Retain the Corridor Connector along MD 124.
 - o Include the Dorsey Mill bridge in the Corridor Connectors, but note that it is not the responsibility of the transit project to implement the bridge.
- General language about facility planning
 - o Potential language: The Plan recommends rights-of-way to accommodate dedicated lanes in support of the proposed transit network, and acknowledges that further detailed analysis will be completed through subsequent facility plans. Specific alignments are subject to modification during the facility planning process. This Plan does not make recommendations regarding transit operations such as transit routes, frequency of service, or details of station design.
- Additions to the ROW Table
 - o Montgomery County Roads (Table 14)
 - All roads were designated 2T in the MPOHT with the same ROW recommended for Corridor Forward, except the highlighted Medical Center Drive segment which was just 4 lanes (but still 100-150 feet ROW).

Roadway	From	To	Designation	Minimum ROW'	Preferred Number of Dedicated Bus Lanes
Dorsey Mill Road	Century Boulevard	Observation Drive	Business Street, B-14	150	2
Decoverly Drive	Gaithersburg City Limit	Diamondback Drive	Arterial, A-284	100-150	2
Diamondback Drive	Decoverly Drive	Key West Avenue	Arterial, A-261b	100-150	2
Broschart Road	Key West Avenue	Medical Center Drive	Arterial, A-261b	100-150	2
Medical Center Drive	Fallsgrove Boulevard	Broschart Road	Arterial, A-261d	100-150	2
Medical Center Drive	Broschart Road	Great Seneca Highway	Arterial, A-261d	100-150	2
Medical Center Drive	Great Seneca Highway	Key West Avenue	Arterial, A-261d	100-150	2
Johns Hopkins Drive	Key West Avenue	Belward Campus Drive	Arterial, A-261d	100-150	2
Decoverly Drive	Muddy Branch Road	Johns Hopkins Drive	Arterial, A-284	100-150	2
Muddy Branch Road	Decoverly Drive	Great Seneca Highway	Major Highway, M-15	170	2

○ Roads within Municipalities (Table 15)

Roadway	From	To	Jurisdiction	Preferred Number of Dedicated Bus Lanes
Redland Boulevard	Piccard Drive	MD 355	City of Rockville	2
Piccard Drive	Redland Boulevard	Gude Drive	City of Rockville	2
Fields Road	I-370	Decoverly Drive	City of Gaithersburg	2
Decoverly Drive	Fields Road	Gaithersburg City Limit	City of Gaithersburg	2
Clopper Road	Quince Orchard Road	Watkins Mill Road	City of Gaithersburg	2
Watkins Mill Road	Clopper Road	MD 355	City of Gaithersburg	2

Updated Summary of Recommendations (Table 2)

Recommendation language is unchanged, except where changes are tracked (J) or split from original Recommendation A (now A, B, and F). The T&E Committee also recommended revising the “Future Considerations” header to “Regional Opportunities” and suggested minor edits to recommendation R.

Recommended Near-Term Transit Network	
A.	Implement the MD 355 BRT and Veirs Mill Road BRT.
B.	Implement the Corridor Connectors, a network of dedicated bus lanes in the midcounty and upcounty, which include refinements to the Corridor Cities Transitway.
C.	Support the Great Seneca Transit Network. <i>(Refer to Table 13, Chapter 5.)</i>
D.	Support the North Bethesda Transitway alignment as master-planned. <i>(Refer to Chapter 5.)</i>
E.	Continue state-provided commuter bus service on I-270, making use of the Corridor Connectors when diverting to bus stations in Montgomery County’s population and employment centers via the Corridor Connectors. <i>(Refer to Table 10, Chapter 4.)</i>
Recommended Long-Term Transit Vision	
F.	In the long-term, work with local, state, and regional partners to advance the recommendation for a Red Line Extension to Germantown Town Center. <i>(Refer to Table 11, Chapter 5.)</i>
G.	Support the long-term potential of the Maryland Transit Administration MARC Rail Brunswick Line. <i>(Refer to Table 7, Chapter 4.)</i>
H.	Promote strategic and equitable MARC Rail access by supporting new stations. <i>(Refer to Table 7, Chapter 4.)</i>
Supporting Recommendations	
I.	Convert existing general-purpose travel lanes to dedicated transit lanes on targeted streets to maximize person throughput and improve the relative travel time competitiveness and convenience of transit, including—but not limited to—the streets detailed in the right-of-way table (Table 14). <i>(Refer to Table 18, Chapter 6.)</i>
J.	Develop a multimodal transit hub within the vicinity of Metropolitan Grove as part of implementation of the Red Line Extension to serve local bus, BRT, Metrorail and MARC services. <i>(Refer to Table 16, Chapter 5.)</i>
K.	Prioritize the provision of dedicated transit lanes and spaces for walking, bicycling and other micromobility modes over auto capacity to maximize person throughput and improve the relative travel time competitiveness and convenience of transit. <i>(Refer to Table 18, Chapter 6.)</i>
L.	Ensure safe and efficient access to planned transit stops for pedestrians, bicyclists, and other micromobility modes. <i>(Refer to Table 16, Chapter 5.)</i>
M.	Update relevant land use plans and guidelines to support master-planned transit facilities. <i>(Refer to Table 16, Chapter 5.)</i>
N.	Maximize the travel potential of dedicated bus lanes. <i>(Refer to Table 17, Chapter 6.)</i>
O.	Where beneficial and/or necessary, support the incremental implementation of dedicated bus lanes. <i>(Refer to Table 17, Chapter 6.)</i>
Regional Opportunities Future Considerations	
P.	Study extensions of the Purple Line to understand if and where extension(s) of the county’s light rail service may be warranted. <i>(Refer to Chapter 4.)</i>
Q.	Design and construct the American Legion Bridge to support rail transit. <i>(Refer to Table 6, Chapter 4.)</i>
R.	Explore a direct transitway connection between the recommended WMATA Metrorail Red Line terminus and Frederick City County . <i>(Refer to Table 8, Chapter 4.)</i>

