



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

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To: The Commission

Date: October 11, 2018

From: Carol S. Rubin, Special Project Manager
I-495 & I-270 Managed Lanes Study

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Subject: Briefing and Discussion for October 2018 Full Commission Meeting
I-495 & I-270 Managed Lanes Study

The purpose of this Memorandum is to brief the Commission on the status of the I-495 & I-270 Managed Lanes Study; more specifically i) to solidify your understanding of the project and our role in the process – not just as a “cooperating agency” for the National Environmental Policy Act (NEPA) purposes, but as the stewards of the natural and built environments in Montgomery and Prince George’s Counties, ii) to brief you on what the M-NCPPC staff have been doing to assure you that staff is working diligently to address the Commission’s responsibilities, and iii) to discuss next steps in the process and how we intend to meet the aggressive project schedule. The most significant part of the discussion will center on staff’s analysis of the 15+ Alternatives presented by the Maryland State Highway Administration (SHA) at the July 18th meeting so that we can get a sense of your most critical issues/concerns as we attempt to influence SHA towards their selection of the Alternatives Retained for Detailed Study (ARDS).

I. Background.

Project Description: Per the SHA web page <https://495-270-p3.com/program-overview/>, the project is described as follows: “To help address some of Maryland’s transportation challenges, the Traffic Relief Plan [introduced by the Governor] will incorporate many projects around the state by providing a ‘system of systems’ for users including improvements to highways and transit. The largest initiative in the Traffic Relief Plan will evaluate improvements in the I-495 and I-270 corridors...” The Federal Highway Administration (FHWA) and SHA have initiated the I-495 & I-270 Managed Lanes Study of those highway corridors to evaluate a range of travel demand management alternatives on I-495 from south of the American Legion Bridge in Fairfax County, Virginia to east of the Woodrow Wilson Bridge and on I-270 from I-495 to I-370, with the northern portion of I-270 planned for study next year. Bound by Federal Executive Order to reach permit stage within two years, SHA has proposed an extremely aggressive schedule to

meet NEPA requirements that will culminate with construction/project implementation commencing in late 2020 utilizing a Public Private Partnership (P3).

Whether or not we agree with the approach, FHWA and SHA regard the I-495 & I-270 Managed Lanes Study as a single NEPA project, *not as a transportation plan for the region*. The I-495 & I-270 Managed Lanes Study is essentially a highway project with the limited purpose of developing a travel demand management solution that provides the opportunity for reliable travel times on I-495 and I-270 within the study limits, *enhancing* existing and planned multimodal mobility and connectivity. That message has become clearer with the recent revisions to the program overview description on the SHA web page. Further, they note in the Purpose and Need Statement that the study will address the following needs, further demonstrating SHA's focused view of the project:

- **Accommodate Existing Traffic and Long-Term Traffic Growth.** High travel demand from commuter, business, and recreational trips results in severe congestion from 7 to 10 hours per day on the study corridors, which is expected to deteriorate further by the planning horizon year of 2040.
- **Enhance Trip Reliability.** Congestion on I-495 and I-270 results in unpredictable travel times...and in recent years, the study corridors have become so unreliable that uncertain travel times are experienced daily. More dependable travel times are needed to ensure trip reliability.
- **Provide Additional Roadway Travel Choices.** Travelers on I-495 and I-270 do not have enough options for efficient travel during extensive periods of congestion. Additional roadway management options are needed to improve travel choices, while retaining the general-purpose lanes.
- **Accommodate Homeland Security.** The National Capital Region is considered the main hub of government, military, and community installations related to homeland security. These agencies and installations rely on quick, unobstructed roadway access during a homeland security threat.
- **Improve Movement of Goods and Services.** I-495 and I-270 are major regional transportation networks that support the movement of passenger and freight travel within the National Capital Region. Efficient and reliable highway movement is necessary to accommodate passenger and freight travel, moving goods and services through the region.

II. Fulfilling the Role of M-NCPPC.

A. As Cooperating Agency

M-NCPPC has been identified as a "Cooperating Agency" in this process, which means that under NEPA our concurrence or concurrence with comment (together referred to as "concurrence") is needed for certain stages of federal funding to be advanced for the project. Those stages are: i) the Purpose and Need Statement (the introduction to the EIS) – which was due May 2018, ii) selection of the Alternatives Retained for Detailed Study (ARDS) – expected January 2019, and iii) selection of the final alignment or Preferred Alignment (PA) – expected March 2019. The Montgomery County and Prince

George's County Governments have been identified as a "Participating Agencies," which means that comments are accepted for the Record of Decision, but concurrence is not required for funding. ***While neither the County Council's nor the Executive Branch's concurrence is a required part of the process for this project, M-NCPPC has been collaborating closely with both Montgomery and Prince George's County Departments of Transportation and looking to our respective county's elected officials for guidance at each step as the process moves forward.***

Purpose and Need Statement. The purpose of NEPA is to ensure that environmental factors are weighted equally when compared to other factors in the decision-making process undertaken by federal agencies. The Purpose and Need Statement sets the stage for selection of the ARDS from the initial list of alternatives proposed. But since it serves as the preamble to the Environmental Impact Statement (EIS), the final draft that would incorporate agency comments will not be complete until after the Preferred Alignment is selected.

Montgomery Parks submitted their comments to the draft Purpose and Need Statement to SHA in early spring, and all but a few of their critical concerns have been addressed. We continue to include those outstanding issues with our other priorities. Montgomery Planning submitted their comments to SHA in early August, followed shortly thereafter by both Prince George's departments. Despite our repeated requests, SHA has not yet responded to any comments other than Montgomery Parks, and we don't expect anything until mid-November. Responses to our comments to the Purpose and Need would have been helpful to make recommendations moving forward from the 15+ Alternatives to the ARDS. In fact, the federal guidance on NEPA indicates that "the project purpose and need drives the process for alternatives consideration, in-depth analysis, and ultimate selection."

However, since SHA is continuing to move forward and is maintaining the aggressive schedule mandated by the Federal Executive Order, it would be less than prudent to delay that review while we wait for their responses. The federal guidance on NEPA further states that "the purpose and need section of the project may, and probably should, evolve as information is developed and more is learned about the project and the corridor." Therefore, as part of this next stage in the process, working toward selection of the ARDS, we will ask that the concerns we have raised during our Purpose and Need Statement review be addressed by the studies to be procured for the ARDS. With that process, each of our concerns should be considered in determining the Preferred Alignment.

The following are critical priorities staff raised in our Purpose and Need review, which we submitted to SHA:

1. The Purpose and Need does not clearly articulate the problem, as congestion is merely a symptom. Specifically, we are looking for analysis of the regional travel patterns that contribute to the congestion now experienced on I-495 and I-270,

- what type of congestion is occurring and whether it is link or merge and weaving capacity, where is the congestion occurring, and how frequently it occurs.
2. The metrics to be applied to the 15+ Alternatives need to be more clearly and objectively articulated so that those alternatives can be appropriately evaluated during selection of the ARDS.
 3. The NEPA process emphasizes evaluating multimodal strategies. The Alternatives are heavily skewed towards motorists. There is only one transit alternative and it appears that it will be evaluated on its own against the other alternatives that increase capacity for SOV's. If the ARDS incorporate transit and other multimodal strategies as elements of other alternatives, then analysis of the multi-modal/transit elements should be as robust as the stand-alone highway alternatives.
 4. Segmentation and expansion of the Study Area for both traffic and land use patterns, as well as existing ROW should be explored and evaluated. With regard to the Study Area boundaries, the project cuts off critical portions of I-270 (north from 370 to I-70), and I-95 (east from exit 7 to the Woodrow Wilson Bridge) which will make it impossible to evaluate alternatives for a comprehensive solution so as not to create a new bottleneck. We believe the most appropriate segmentation for operations are:
 - a. I-270 from I-70 and south over the American Legion Bridge;
 - b. I-270 spur and east to I-95;
 - c. I-95 east to Rte. 50; and
 - d. Rte. 50 to the Woodrow Wilson Bridge.
 5. Emphasize equitable transportation solutions that address the mobility needs of all users by providing a range of transportation options.
 6. We need a commitment that the P3 will be required to meet more than the stormwater management requirements for "maintenance." In other words, at least some of the existing conditions need to have stormwater treatment, particularly if there is any impact on stream valley parkland.
 7. "Environmental Stewardship" must be identified as a "distinct need" (as was the case for the ICC).

B. As Stewards of the Natural and Built Environments in Montgomery and Prince George's Counties

Each of the Planning and Parks departments has assigned staff to review all aspects of this Study through a variety of lenses with overall coordination by designated project coordinators, Carol Rubin for Montgomery County, and Debra Borden for Prince George's County. For the Planning departments, we have created internal teams of transportation planners for review using best practices in transportation and land use planning. After the ARDS are released, Planning staff must review all the studies performed to influence a Preferred Alignment. And before SHA can select their Preferred Alignment, they must bring the proposal before M-NCPPC for Mandatory

Referral Review (expected early March 2019), which Planning staff must prepare for Commission action.

For the Parks departments, we have created internal teams of environmental specialists to consider the environmental, cultural and historic resource impacts of any of the alternatives proposed, as well as to prepare for any required mitigation. The parkland impact within the Study Area considering the alternatives proposed could include as much as 209 acres of parkland in Montgomery County and 50 acres of parkland in Prince George's County, so *any* build alternative selected is likely to have significant impacts on parkland and associated facilities, programs, and natural and cultural resources. The magnitude of the potential impact of this project as well as potential 4(f) and 404 mitigation are being carefully evaluated by Parks' staff in coordination with Planning staff.

None of these teams are working in silos, as the staff from *all* departments are regularly coordinating their respective review, analyses and recommendations.

We will be asking SHA to provide supplemental staff and/or funding for additional staff to address the significant strain on our resources for a work program that was not budgeted in FY19. Although we could have anticipated some of the project needs, we had not anticipated the extremely aggressive schedule that is having an impact on staff while they continue to maintain the loads of their existing work programs. As previously indicated, we are coordinating and collaborating with our colleagues in each county's Department of Transportation. And to address any potential impacts to stream-valley parks acquired with funding through the Capper-Cramton Act, we are coordinating and collaborating with the National Capital Planning Commission (NCPC), also named as a "Cooperating Agency" by SHA.

Although the I-495 & I-270 Managed Lanes Study is a state initiative, as the stewards of the natural and built environment for the region, the residents of and special interest groups established throughout Montgomery and Prince George's Counties look to the Commission as a resource; particularly since SHA staff is not as readily available to the general public outside of the NEPA-required public process. Staff is helping to translate SHA's communications and processes, provide transparency as appropriate, and assist our stakeholders as they navigate through the difficult and complicated NEPA process and the aggressive schedule being applied to this initiative. We have attended community meetings and responded to numerous direct inquiries from the public. We have developed, and regularly update a dedicated web page to provide information about the Study, housed on the Montgomery Planning Department website but accessible to all through direct links.

Our goal is not to create roadblocks for SHA, but to ensure that they are fully compliant with NEPA and other legal requirements, and that they apply best practices in

transportation and land use planning while moving forward with the Study, taking into account that they view it as a single project within a “system of systems.”

III. Next Steps.

A. Immediate Project Schedule

- 10/17/18: Commission Meeting – Discussion of and comments to the Alternatives to influence SHA recommendation of ARDS
- 11/14/18: Inter-Agency Working Group (IAWG) Meeting - SHA presentation of recommended ARDS prior to agency comment
- 11/21/18: Commission Meeting - ***Briefing and discussion only needed if the Commissioners want staff to present preliminary comments on the MDOT SHA recommended ARDS before the 12/5 deadline for staff response***
- 12/5/18: Preliminary agency/staff level comments due on ARDS
- 12/12/18: IWAG – discussion of ARDS comments received
- 12/19/18: Commission Meeting
- 1/16/19: Commission Meeting – ***Briefing and discussion of SHA recommended ARDS for agency concurrence unless, due to Open Meetings requirement, M-NCPPC concurrence is scheduled for after public release of ARDS***
- 1/23/19: IAWG - Cooperating Agency concurrence (or concurrence with comment) to ARDS due to MDOT SHA
- 2/20/19: Commission Meeting - ***Briefing and discussion of SHA recommended ARDS for M-NCPPC concurrence if not considered at 1/16/19 meeting***
- Spring 2019: Mandatory Referral prior to selection of Preferred Alignment (serves as M-NCPPC concurrence of Preferred Alignment)

B. Review of Alternatives

To influence the MDOT SHA recommendation of the ARDS, the critical next deliverable is staff's analyses and recommendations on the 15+ Alternatives originally presented by SHA. They are included as an attachment to this memo for ease of reference.

Technical staff from all four departments, Prince George's Planning, Prince George's Parks and Recreation, Montgomery Planning and Montgomery Parks have been meeting to review all Alternatives, and we will be prepared at the Full Commission meeting on October 17th to present our analyses and recommendations. Due to the aggressive schedule that has been established for this project, and because the internal technical staff discussions are so difficult to coordinate across all departments, we did not have advance recommendations for your review with this memo. However, we welcome a robust discussion at the Commission meeting so that any critical concerns you may have that staff has not addressed will be included in our final comments to SHA.

Attachment A: Alternatives for discussion, including definitions



Definitions

- **General Purpose (GP) Lanes:** freeway or expressway lanes open to all motor vehicles
- **Managed Lanes:** highway facility or set of lanes where operating strategies are used to control number of vehicles using the lanes
- **Priced Managed Lanes** combines two highway management tools:
 - *Congestion Pricing:* use of road user pricing that varies with the level of congestion and/or time of day to control traffic demand during peak periods, providing incentives for some motorists to shift trips to off-peak times, less-congested routes, or alternative modes
 - *Lane Management:* approach that restricts access to designated highway lanes based on occupancy or vehicle type in designated lanes to maintain a desirable level of traffic service
- **High-occupancy Vehicle Lanes (HOV):** lanes reserved for high-occupancy vehicles, a motor vehicle carrying at least two or more persons including carpools, vanpools, and buses



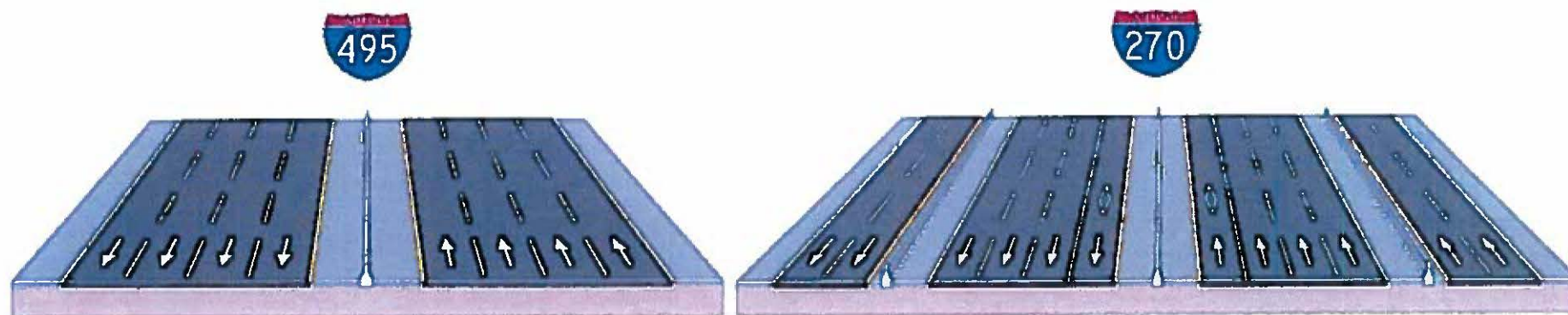
Definitions

- **Contraflow Lanes:** lanes operating adjacent to but in the opposite direction of the normal flow of traffic during peak-direction travel; usually separated by pylons or movable barrier
- **Reversible Lanes:** lanes where direction of traffic flow can be changed to match peak direction of travel, typically inbound in the morning and outbound in the afternoon
- **Transportation Systems Management (TSM):** operating strategies that improve the operation and coordination of transportation facilities
- **Travel Demand Management (TDM):** strategies or incentives to provide the most efficient and effective use of existing transportation services and facilities (e.g., rideshare and telecommuting promotion, managed lanes, preferential parking, road pricing, etc.)



1 No Build (Existing)

All projects in Constrained Long-Range Plan (CLRP) including I-270 Innovative Congestion Management (ICM) Improvements



Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes Could Include Buses

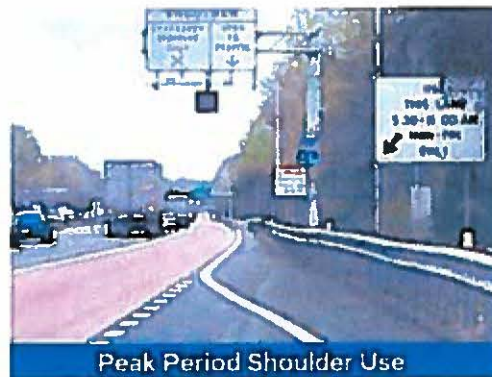


2 Transportation System Management (TSM) / Travel Demand Management (TDM)

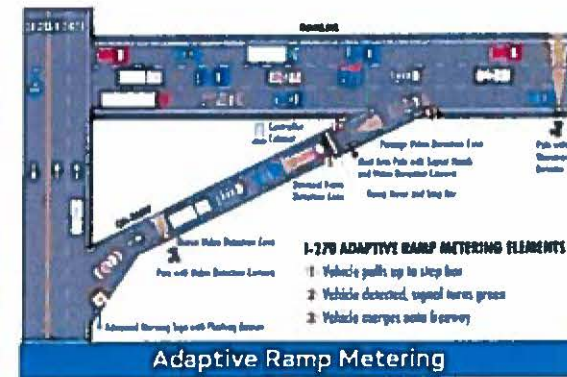
Solutions along I-495 and I-270: restriping within existing pavement, peak period shoulder use, ramp metering and Active Traffic Management (ATM) strategies



Active Traffic Management



Peak Period Shoulder Use



Adaptive Ramp Metering



3 Add 1 General Purpose (GP) Lane

Add one general-purpose lane in each direction on I-495 and I-270



Legend

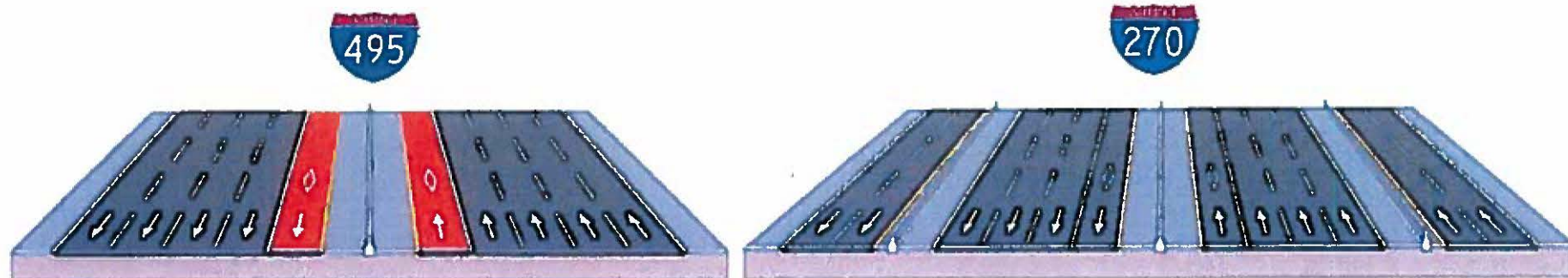
- New GP Lanes
- New HOV Managed Lanes
- New HOV Managed Lanes Could Include Buses
- New Priced Managed Lanes
- Confluence Lanes

- Motor Managed Lanes



4 1-Lane, High-Occupancy Vehicle (HOV) Managed Lane Network

Add one lane in each direction on I-495 and retain existing HOV lane in each direction on I-270



Legend

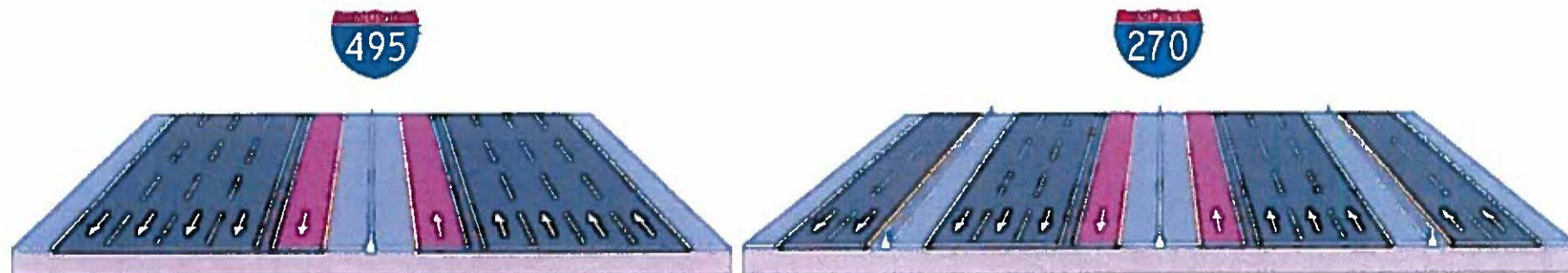
- New GP Lanes
- New HOV Managed Lanes
- New Priced Managed Lanes
- Contraflow Lanes

* Note: Managed Lanes
Could Include Rules



5 1-Lane, Priced Managed Lane Network

Add one priced managed lane in each direction on **I-495** and convert one existing HOV lane in each direction to a price managed lane on **I-270**



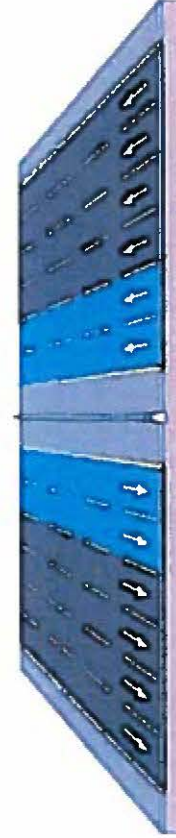
Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes
Could Include Buses



6 Add 2 General Purpose (GP) Lanes

Add two general-purpose lanes in each direction on I-495 and I-270



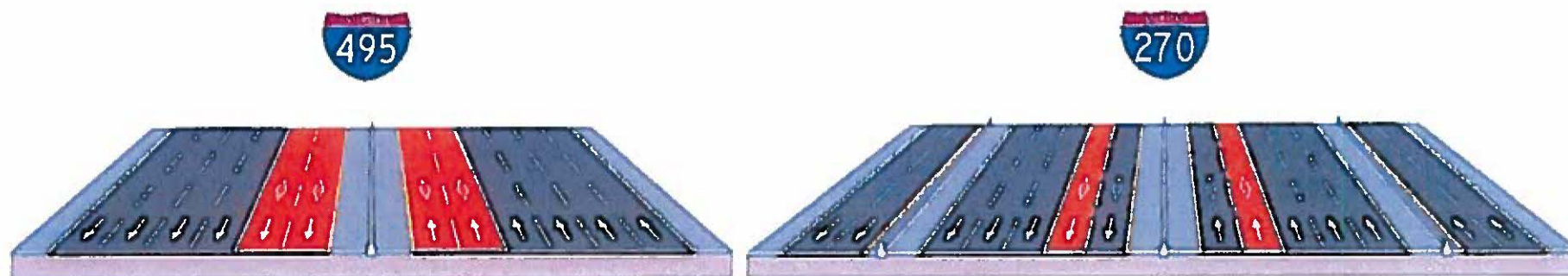
Legend

	New GP Lanes
	New HOV Managed Lanes
	New HOV Managed Lanes • Meter Managed Lanes • Could Include Buses
	New Priced Managed Lanes • Contraflow Lanes



7 2-Lane, High-Occupancy Vehicle (HOV) Managed Lane Network

Add two HOV managed lanes in each direction **on I-495** and retain one existing HOV managed lane and add one HOV lane in each direction **on I-270**



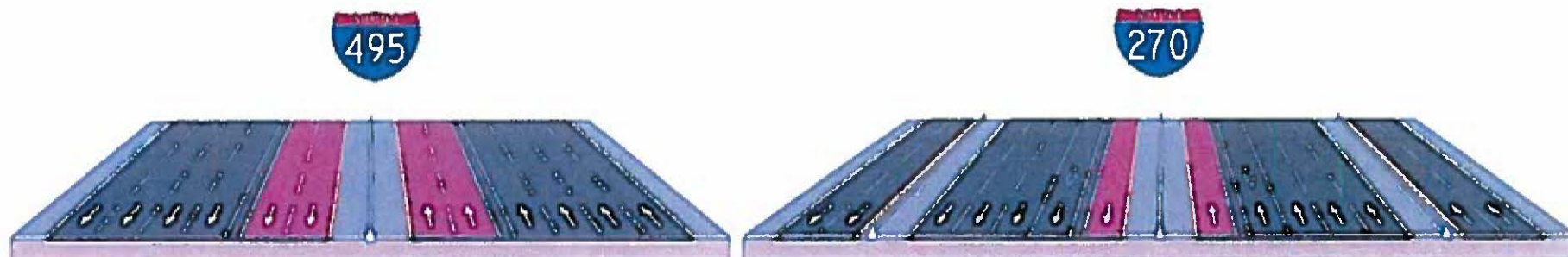
Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes Could Include Buses



8 2-Lane, Priced Managed Lanes Network on I-495, 1-Lane Priced and 1-Lane, HOV Managed Lane Network on I-270 Only:

Add two priced managed lanes in each direction on **I-495** and add priced managed lane and retain one HOV lane in each direction on **I-270**



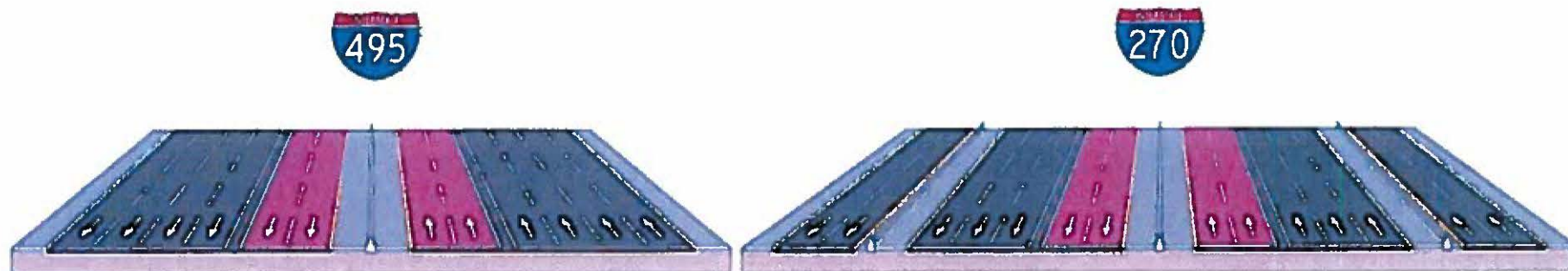
Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes Could Include Buses



9 2-Lane, Priced Managed Lane Network

Add two priced managed lanes in each direction on **I-495** and convert one existing HOV lane to a priced managed lane and add one priced managed lane in each direction on **I-270**



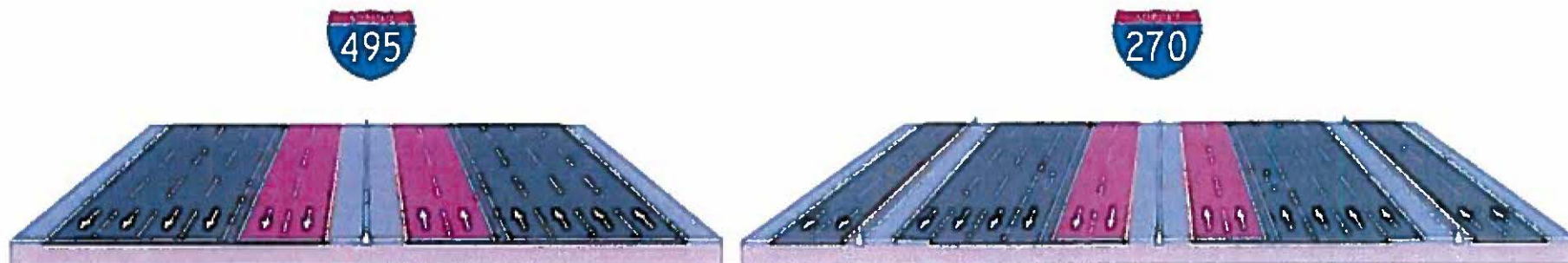
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- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contrailow Lanes
- * Note: Managed Lanes Could include Buses



10 2-Lane, Priced Managed Lane Network and 1-Lane HOV Managed Lane Network on I-270 Only

Add two priced managed lanes in each direction on I-495 and on I-270 and retain one existing HOV lane in each direction on I-270 only

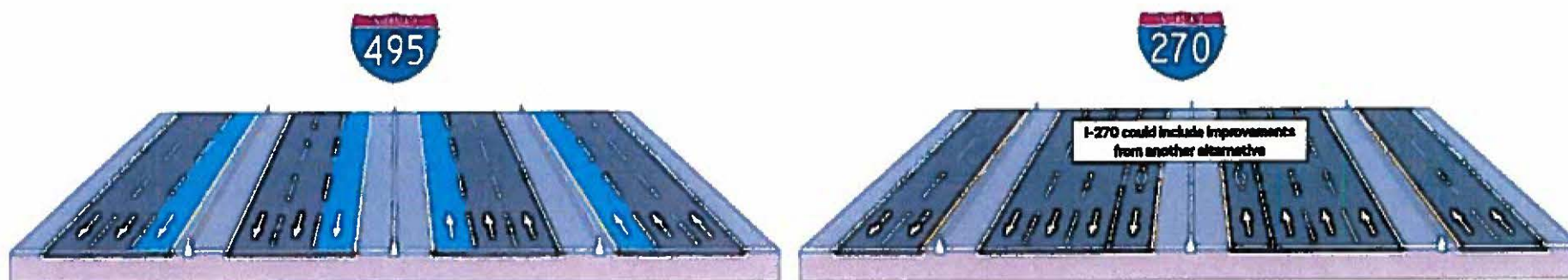


Legend	
	New GP Lanes
	New HOV Managed Lanes
	New Priced Managed Lanes
	Contrast Lanes

* Note: Managed Lanes Could Include Buses

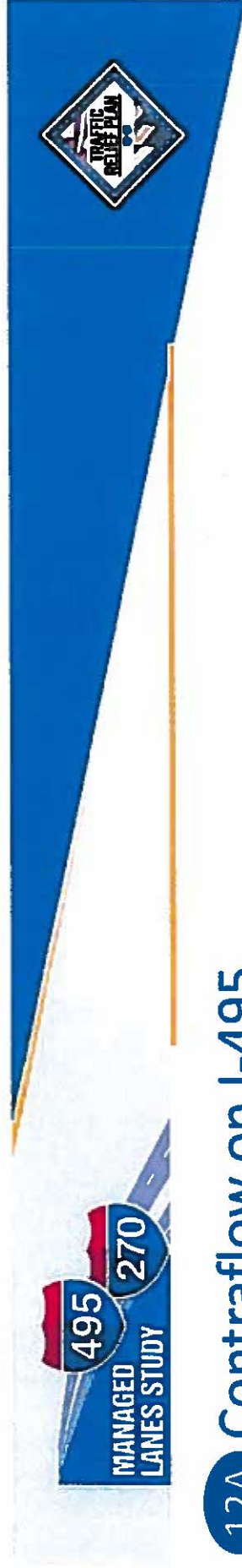
11 Collector/Distributor on I-495

Physically separate traffic using collector-distributor (C-D) lanes, adding two GP lanes in each direction on I-495; retain existing lanes and on I-270



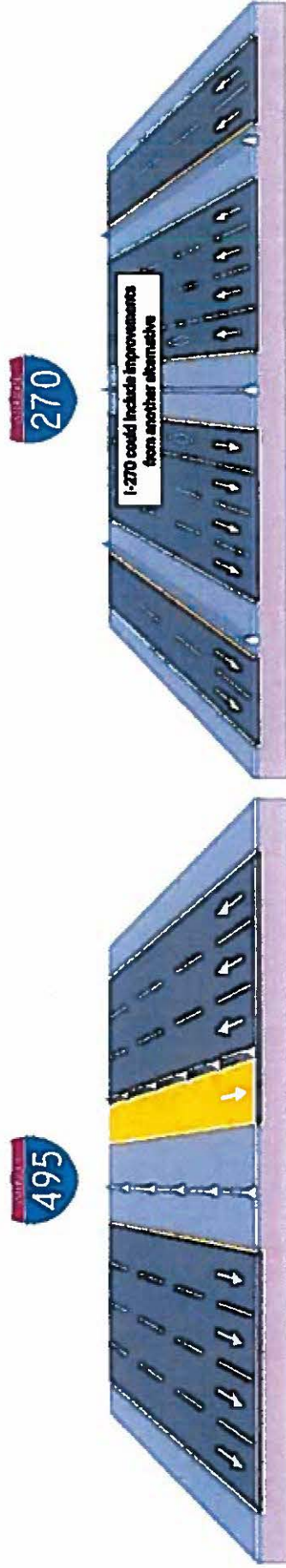
Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes
Could Include Buses



12A Contraflow on I-495

Convert existing general-purpose lane on I-495 to contraflow lane during peak periods

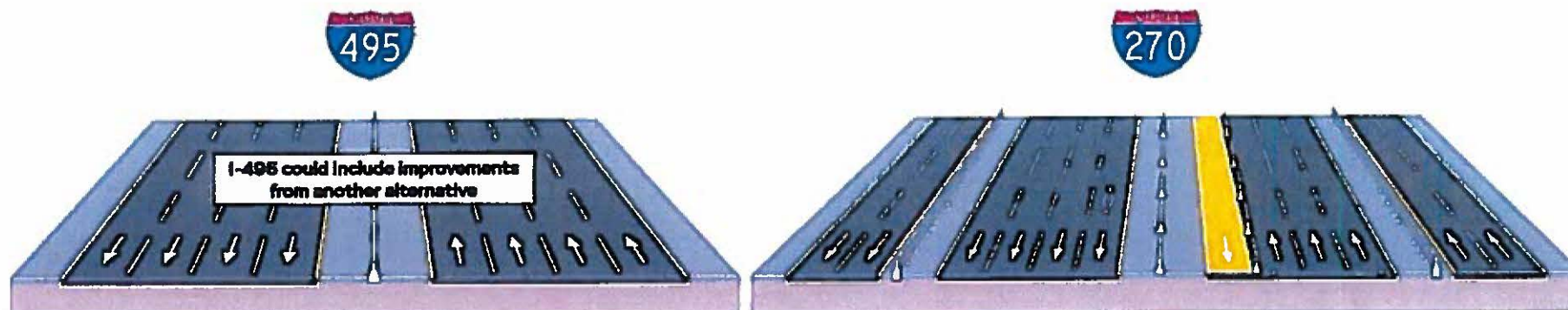


- Legend**
- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
 - Near Managed Lanes Could Include Bus



12B Contraflow on I-270

Convert existing HOV lane on I-270 to contraflow lane during peak periods



Legend

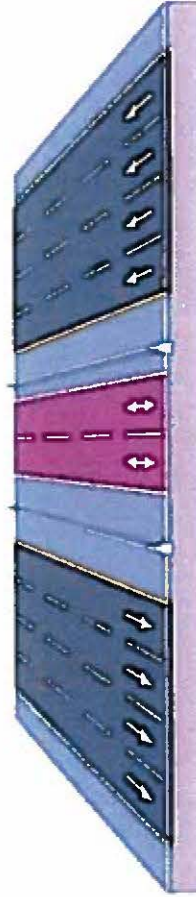
- New GP Lanes
- New HOV Managed Lanes
- New Priced Managed Lanes
- Contraflow Lanes

* Note: Managed Lanes
Could Include Buses



13A Priced Managed, Reversible Lane Network on I-495

Add two priced managed reversible lanes on I-495



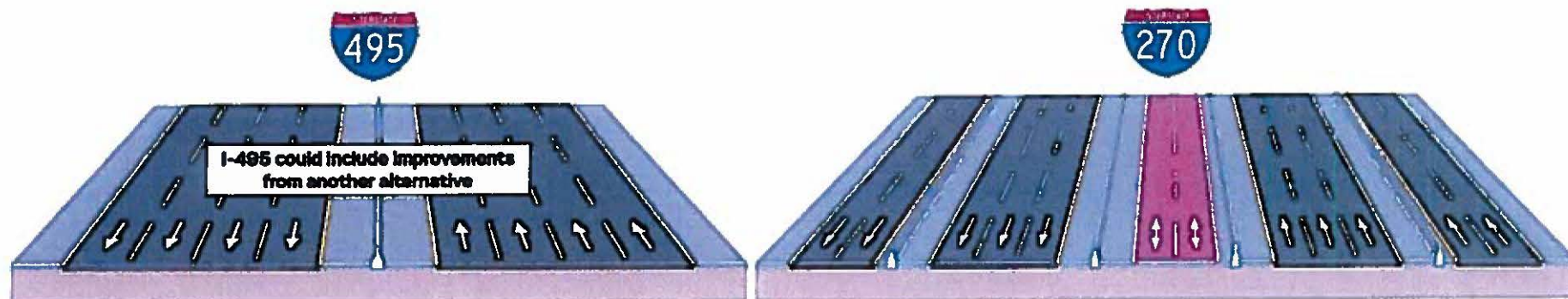
Legend

	New GP Lanes		New Managed Lanes Could Include Buses
	New HOV Managed Lanes		Concaveflow Lanes
	New Priced Managed Lanes		



13B Price Managed, Reversible Lane Network on I-270:

Convert existing HOV lanes to two priced managed reversible lanes on I-270



Legend

- New GP Lanes
 - New HOV Managed Lanes
 - New Priced Managed Lanes
 - Contraflow Lanes
- * Note: Managed Lanes Could Include Buses



Rail and Bus Transit

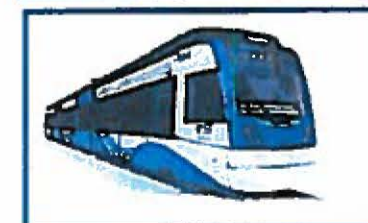
14A

Heavy Rail: This alternative considers heavy rail transit parallel to the existing I-495 and/or I-270 corridors



14B

Light Rail: This alternative considers light rail transit parallel to the existing I-495 and I-270 corridors, such as the Purple Line currently under construction



14C

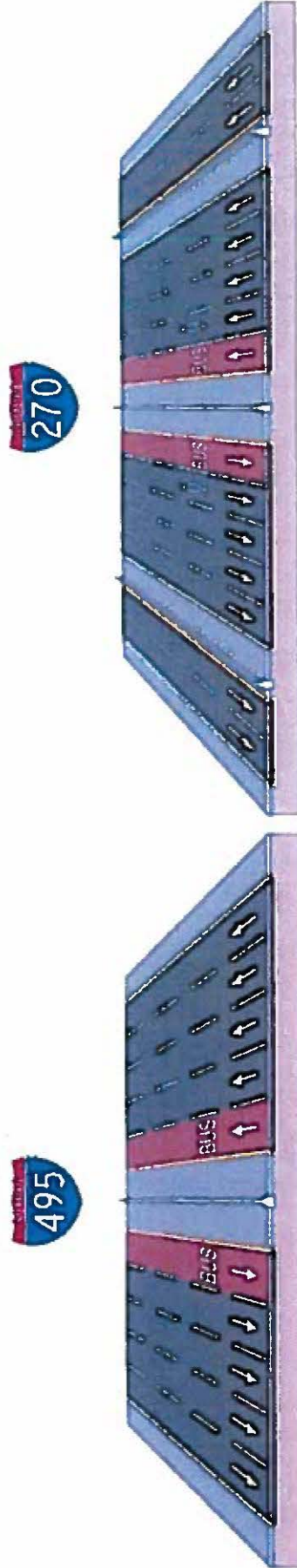
Fixed Guideway Bus Rapid Transit (Off Alignment): This alternative considers fixed guideway bus rapid transit (BRT) along a new alignment parallel to the existing I-495 and I-270 corridors





15 Dedicated Bus Managed Lane

Dedicated Bus Managed Lane on I-495 and I-270 Roadways



Legend	
	New CP Lanes
	New HOV Managed Lanes
	New HOV Managed Lanes
	New Priced Managed Lanes
	Conflow Lanes
	Notes: Managed Lanes Could Include Buses