MEMORANDUM

August 29, 2018

TO: Caryn Brookman, Environmental Program Manager
Maryland State Highway Administration, I-495 & I-270 P3 Office

FROM: Christopher Conklin, P.E., Deputy Director for Policy
Montgomery County Department of Transportation

SUBJECT: I-495 and I-270 Managed Lane Study – Inter-Agency Working Group
Comments on Alternatives and Screening Criteria

Thank you for the continued opportunities through the Inter-Agency Working Group to provide input on the I-495 and I-270 Managed Lanes Study. We would like to offer the following comments on the screening criteria shown at the Inter-Agency Working Group meeting on July 11, 2018:

1) **Existing Conditions / Needs:** Data collection and analysis should identify the current needs and congestion points. While the I-270 corridor may be able to utilize past studies and projects (including the ongoing ICM project), the I-495 corridor has not had as much past study and could potentially benefit significantly from a similar approach as the series of small treatments included in the I-270 ICM project.

2) **Transit Alternatives:** We feel that potential transit projects serving the target areas could score highly as potential alternatives, and urge that transit be thoroughly considered as part of the solution to mobility needs on the I-270 and I-495 corridors. We suggest the following alternatives for consideration:
   a. 14A HRT – 3rd Track MARC and service improvements; run MARC trains two-way throughout the day the weekends
   b. 14A HRT – Extend Red Line to Metropolitan Grove
   c. 14A HRT – Extend Red Line to the Germantown Transit Center
   d. 14B LRT – A light rail alignment along MD 355
   e. 14B LRT – Extend Purple Line to Tysons Corner
   f. 14B LRT – Extend Purple Line to Largo Town Center
   g. 14B LRT – Extend Purple Line to National Harbor / Alexandria
   h. 14C BRT – The MD 355 North and South BRT corridors
i. 14C BRT – The MD 586/MD193 BRT corridor
j. 14C BRT – The Randolph Rd/North Bethesda Transitway BRT corridor
k. 14C BRT – Provide BRT from Montgomery Mall to Tysons Corner
l. 14C BRT – Provide BRT from New Carrollton to Largo Town Center
m. 14C BRT – Provide BRT from New Carrollton to National Harbor / Alexandria
n. 15 BRT – Bus on Shoulder

3) **Additional Alternatives:** In addition to the transit alternatives noted above, we also suggest that the State give consideration toward the expansion of alternative routes around the DC region to shift traffic away from the I-95/495 corridors. This evaluation could build on past study of corridors such as:
a. I-97/US 301 to the east of the Washington D.C. region

4) **Screening Metric Comments:**
   a. **ENGINEERING #1**
      Replace “Traffic” with “Travel Demand” to generalize vehicles to people.
   b. **ENGINEERING #2**
      Add “for all modes”
   c. **ENGINEERING #3**
      Expand to include options beyond highway travel, or add another metric related to the availability of alternate modes to highway travel.
   d. **ENGINEERING #4**
      Consider combining this with general phrasing related to safety and reducing the risk of collisions. Alternately, Safety might be a screening metric in its own right.
   e. **HOMELAND SECURITY #1**
      How will the transit alternatives be measured against this criterion? To what distance or destination is it deemed adequate to evacuate to for purposes of this measurement, and under what conditions would an evacuation be likely?
   f. **HOMELAND SECURITY #2**
      How will the transit alternatives be measured against this criterion? Would this be given as N/A, or would it be a “Yes” presuming emergency services have access to transit facilities/vehicles?
   g. **HOMELAND SECURITY #3 (NEW)**
      Does the alternative provide a redundant travel option in the event of a disaster or attack on the highway corridor?
h. **MOVEMENT OF GOODS & SERVICES #1**
How will the transit alternatives be measured against this criterion? Will it be “N/A” as trucks would not be on heavy rail or are unlikely to be on LRT/BRT facilities? Or “No” for the same reason: trucks would be barred from their facilities? Or “Yes” on a presumption that mode shift would expand capacity for trucks?

i. **FINANCIAL VIABILITY**
What range of revenue tools is the state willing to consider – for example a regional revenue model, like Northern Virginia, could provide a revenue stream to substitute for P3 generated revenue to support some alternatives?

j. **ENVIRONMENTAL (ALL)**
Consider rephrasing each metric into a response of Low, Med, High.

5) **Additional Screening Metrics:**

a. **ENGINEERING** – Consider an additional metric evaluating the constructability / MOT impacts on a scale of Low, Med, High.

b. **ENGINEERING** – Consider an additional metric evaluating an alternative’s ease of access to between the new lanes and the arterials directly serving / served by I-270.

c. **HOMELAND SECURITY** – Consider an additional yes/no metric “Does the alternative provide adequate area for traffic enforcement to operate?” This would particularly be affected by the loss of shoulders along the left and/or right sides of any sections with 3+ lanes.

d. **FINANCIAL VIABILITY** – Consider an additional metric evaluating each alternative’s cost to the facility users by Low, Med, High.

e. **MULTI-MODAL CONNECTIVITY** – Consider an additional metric related to Engineering #3: Does the alternative increase or reduce the incentive for users to utilize vehicles at a higher occupancy?

f. **MULTI-MODAL CONNECTIVITY** – Consider an additional metric evaluating the alternative’s impacts on the NADMS goals of area master plans by Low, Med, High.

g. **ENVIRONMENTAL** – Consider additional metrics relating to environmental/social justice, such as equity, toll affordability across socioeconomic populations, and access to the facilities by transit vehicles.

h. **ENVIRONMENTAL** – Consider an additional low/med/high metric “What is the alternative’s scale of impact on adjacent properties?”
i. **ENVIRONMENTAL** – Consider an additional low/med/high metric “What is the alternative’s scale of impact on the tree canopy?”

j. **ENVIRONMENTAL** – Consider an additional low/med/high metric “What is the alternative’s scale of impact on Vehicle-Miles Traveled?” [this could potentially satisfy any interest in considering Fuel Consumption and Emissions]

6) **Individual Segments:** Consider separate & distinct alternatives for each of at least four segments, as noted below. There may not be a “one-size fits all” alternative, and different options – minding transitions – may better fit some segments than others.

   a. I-270
   b. I-495 west of I-270
   c. I-495 between the I-270 spurs
   d. I-495 between I-270 and I-95
   e. I-495 east of I-95

Should you have any questions regarding our comments on the plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at 240-777-7200.

CC:ab

cc:  Al Roshdieh, MCDOT  
     Gary Erenrich, MCDOT  
     Andrew Bossi, MCDOT  
     Casey Anderson, MNCPPC  
     Stephen Aldrich, MNCPPC  
     Glenn Orlin, Montgomery County Council  
     Craig Simoneau, City of Rockville  
     Ollie Mumpower, City of Gaithersburg  
     Vic Weissberg, PG-DPWT  
     Matt Baker, SHA