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  
Department of Transportation

SUBJECT: I-495 and I-270 Managed Lane Study – Inter-Agency Working Group  
Reiterated Comments on the Purpose and Need

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. As stated previously in correspondence and during the IAWG’s meetings, we continue to have reservations about the Project’s Purpose and Need. Our reservations are primarily related to the focus on congestion relief instead of a broader goal of mobility improvement for the area served by the highway corridors. While we agree that these highways are subject to significant, recurring congestion, the Project should incorporate solutions other than expanding and managing highway capacity.

The Purpose and Need should be modified to account for the mobility benefits of transit and high-occupancy vehicle (HOV) alternatives that are additive to any impact they may have on congestion. Additional language should be included to expand upon the prioritization of transit and other high-occupancy vehicles serving the corridor. Metrics such as person-throughput, household and employment center accessibility, and the Non-Auto Drive Mode Share (NADMS) for these corridors are possibly more important than metrics related to highway congestion mitigation. Expansion of the Purpose and Need will help ensure that the proposed solutions are in keeping with the County’s master plans, programs, and policies that are broadly based on improved transportation sustainability and expanding the range of travel options – including improvements to the highway system.

With an improved Purpose and Need, we support inclusion of transit alternatives both within the highway corridors and those that serve the travel markets of the highway corridors. Stronger language in the Purpose & Need toward high occupancy vehicles would also help to ensure that there is no reduction in HOV incentives from existing conditions, which currently help to increase the capacity of I-270 and move a greater volume of people through the corridor. The continued provision of HOV access may also be a component of equity considerations. Some variation of priority access for HOV and transit must be maintained at least for I-270 and we urge it be considered also for I-495.
We also suggest that the study area be expanded back to I-70. While we recognize that the State feels the area north of I-370 may not be as pressing a need, we feel that congestion in the vicinity of MD 117 and MD 124 as well as near the northbound bottleneck north of MD 121 are all issues that may benefit from this project’s evaluations.

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.

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