



**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

**To:** The Commission

**Date:** April 29, 2019

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

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**Subject:** Briefing and Discussion for May 1, 2019, Full Commission Meeting  
I-495 & I-270 Managed Lanes Study

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The Maryland Department of Transportation and State Highway Administration (MDOT SHA) have described the I-495 & I-270 Managed Lanes Study as the largest initiative in the Traffic Relief Plan [introduced by the Governor] to evaluate improvements in the I-495 and I-270 corridors. The Federal Highway Administration (FHWA) and MDOT SHA have initiated the I-495 & I-270 Managed Lanes Study 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 at MD 5, and on I-270 from I-495 to I-370. The next phase to be studied will, according to MDOT SHA, begin this Spring and will include the northern portion of I-270 and I-495 west of MD 5 to the Woodrow Wilson Bridge.

At the October Commission meeting, the next stage in the basic project schedule required M-NCPPC as a Cooperating Agency to concur/concur with comment to the Alternatives Retained for Detailed Study (ARDS) by January 2019, before MDOT SHA was proposing to release the ARDS to the public. Therefore, in order to retain the confidentiality of the information provided to the Inter-Agency Working Group (IAWG), you authorized us to concur with comments on behalf of the Commission based upon the discussion of the Preliminary Alternatives held at the October meeting.

After the October meeting, MDOT SHA revised the Study Process by adding an interim step before recommending the ARDS to the IAWG. In February 2019, MDOT SHA released recommended Screened Alternatives to the IAWG and requested comments in March, which deadline staff was able to meet based on the October discussion with the Commissioners. On April 10, 2019, MDOT SHA released its recommended ARDS to the IAWG and followed through with a confidential "ARDS Paper." Although the ARDS and some background information has since been released to the public through a series of Public Workshops, some of the materials included in the ARDS Paper is not available to the public and must remain confidential.

The purpose of this briefing is to discuss staff's comments to the recommended ARDS in advance of our releasing our response to the ARDS Paper (due May 1, 2019) and assist as we prepare to concur with comment to the ARDS (due June 5, 2019) in accordance with the authority you granted to us at the October Commission meeting.

Many of our comments to the Screened Alternatives were not reflected in the ARDS Paper, and in fact, MDOT SHA made almost no change from the Screened Alternatives to the ARDS. Therefore, we will

explicitly incorporate those comments into our comments to the ARDS Paper. We have included a summary of the comments to the Screened Alternatives at the end of this memorandum. Our additional comments and concerns with regard to the draft ARDS Paper are as follows in summary for reference. Because there are so many, and many of them quite technical in nature, we have highlighted in bold those comments that staff believes are the most critical for discussion.

1. **Proposed Managed Lane access decisions appear to be based entirely on geographic impact without consideration of the relationship to existing and future origin-destination patterns, planned land use, economic development considerations, social equity or safe and efficient access to transit facilities.**
2. **Impacts to parkland along I-495 and I-270 have likely been underestimated due to discrepancies in ownership/control along and including portions of the highway.**
3. **Public transportation must be considered as an integral element in design of the Preferred Alternative.**
4. **Relocations on I-495 and property impacts should include evaluation of whether partial takings result in nonconforming properties under current environmental and zoning laws.**
5. **The benefits and impacts from any of the Alternatives will be incomplete without a local road system/interchange analyses, particularly given the selection of limited access to the Managed Lanes.**
6. **Commitment to Corridor Cities Transitway**
7. Interactive ArcGIS Mapping Tool (SHA Map) needs enhancements and improvements.
8. Travel demand assumptions and methodology are necessary to properly evaluate the ARDS selections.
9. More detail is needed on the noise impact evaluation process, including noise barrier or other proposed mitigation detail to address project impact.
10. Removal of C/D Lane System on I-270 was added to reduce impacts, but a bias has been created in any Build Alternative evaluation without the proper transportation analysis of this Alternative as a stand-alone alternative.
11. Traffic Operations Evaluation in ARDS paper provided no detail as to how the existing traffic congestion was calibrated on connecting roads and on I-495 and I-270.
12. Since financial viability is one of the criteria for selection of the ARDS, the preliminary capital cost estimates and detailed breakdowns by construction items must be included.
13. Design of the American Legion Bridge improvements should provide designated space for transit and walking and cycling.
14. Tie-in from the eastern terminus south of MD 5 across the Woodrow Wilson Bridge should accommodate future transit and bicycle/pedestrian connections.
15. Need for bicycle and pedestrian connections crossing the two corridors.
16. Four-Hour analysis periods are inadequate given the seven to ten hours of congestion identified in the Purpose and Need Statement.
17. Evaluation of the metrics that M-NCPPC provided on February 6, 2019, with our comments to the Purpose and Need Statement is needed.
18. Parks has requested the Stormwater Management Report from MDOT SHA and will provide comments regarding the stormwater management approach once we have the opportunity to review the report.

## Summary List of Comments to Screened Alternatives

1. Lack of any significant transit elements in the selected screened alternatives is unacceptable.
2. Segmentation of the Corridors as follows:
  - a. I-495 between the American Legion Bridge and the I-270 western spur and I-270 between the I-270 western spur and I-370,
  - b. The I-495/I-270 triangle which is a unique configuration of interstate facilities where segmentation alternatives may need to transition,
  - c. I-495 between the I-270 eastern spur and I-95, and
  - d. I-495 between I-95 and MD 5.
3. American Legion Bridge must be designed and constructed to include future heavy rail.
4. The draft ARDS Paper specifically omits any discussion of transition between the existing I-495 local and through lanes from the Woodrow Wilson Bridge and the terminus of the managed lanes south of MD 5. According to Secretary Rahn, the Virginia Department of Transportation (VDOT) will determine the design of this transition at some point in the future. As a result, the state apparently intends to rely upon Virginia to design and implement a segment of I-495 that provides access to the most significant economic assets in Prince George's County.
5. Conversion of Existing HOV Lanes on I-270 to HOT Lanes eliminates general-purpose lanes.
6. Need specific commitment for HOV - whether free versus reduced rate in HOT Lanes.
7. Modification of I-270 Alternatives to eliminate collector/distributor road system deserves further study.
8. Environmental Screening Criteria was insufficient.
9. Alternative 2 - TSM/TDM should be retained.
10. Alternative 5 – 1-Lane HOT Managed Lane Network need not be retained for the I-270 corridor but must be advanced for the I-495 corridor
11. Alternative 8 – 2-Lane, Price-Managed Lane Network on I-495, 1-Lane Priced and 1-Lane HOV Managed Lane Network on I-270 Only should not be advanced as it is inconsistent with sound highway design and operations.
12. Alternative 9 – 2-Lane, HOT Managed Lane Network should not be advanced without repurposing the HOV Lane as a General Purpose Lane.
13. Alternative 10 – 2-Lane Express Toll Managed Lane Network Plus 1-Lane HOV Managed Lane Network on I-270 should not be advanced without repurposing the HOV Lane as a General Purpose Lane.
14. Alternative 13A – Price Managed Reversible Lanes on I-495 should be advanced for further study at certain designated segments.
15. Alternative 13B – HOT Managed Reversible Lane on I-270 is confusing in its presentation.
16. Alternative 13B – HOT Managed Reversible Lane on I-270 should advanced but revised to adequately accommodate the shoulder hour traffic demands by adding a general-purpose lane in each direction to replace the general-purpose function lost for 21 hours a day in the existing HOV lanes.
17. Alternative 13C – ETL Managed Lanes and one HOV Managed Lane Network on I-270 should be advanced and expanded onto I-495 between the American Legion Bridge and the I-270 western spur; however, we recommend that the reversible lane network concept be included for the segment of I-495 between the American Legion Bridge and the I-270 western spur.
18. All Transit Alternatives (Alternatives 14A-Heavy Rail, 14B-Light Rail and 14C-Off Alignment BRT) should be advanced as an integral component or supporting element of other Alternatives for further study.