THE MARYLAND-NATIONAL CAPITAL
Park and Planning Commission

SPECIAL MEETING of the M-NCPPC

June 6, 2019

11:00 a.m. - 12:30 p.m.

The Commission will be meeting by teleconference at the following locations:

County Administration Building
Planning Board Auditorium
14721 Gov. Oden Bowie Drive
Upper Marlboro, MD 20772

Montgomery Regional Office
Auditorium
8787 Georgia Avenue
Silver Spring, MD 20910

Topic of Discussion

I-495 and I-270 Managed Lanes Study Briefing
(Maryland Department of Transportation/State Highway Administration)
(MDOT-SHA)
Discussion and Approval of Commission Staff Recommendation on the Alternatives Retained for Detailed Study (ARDS)

MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
SPECIAL MEETING AGENDA
Thursday, June 6, 2019
11 a.m.

Via Teleconference from

MRO (Auditorium)
CAB (Planning Board Auditorium)

			ACTION Motion	Second
1.	**Approval of Commission Agenda** *(11:00 a.m.)*	(+*) Page 1		
2.	**Action and Presentation Items** *(11:15 a.m.)*			
	a) I-495 and I-270 Managed Lanes Study Briefing (Maryland Department of Transportation/State Highway Administration) (MDOT-SHA). Discussion and Approval of Commission Staff Recommendation on the Alternatives Retained for Detailed Study (Rubin/Hancock)	(+*) Page 3		

(+) Attachment (++) Commissioners Only (*) Vote (H) Handout (LD) Late Delivery

THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
6611 Kenilworth Avenue • Riverdale, Maryland 20737

May 29, 2019

Caryn J. G. Brookman
Environmental Program Manager
Maryland Department of Transportation
State Highway Administration
I-495 & I-270 P3 Office
601 North Calvert Street
Baltimore, MD 21202
By email: CBrookman@mdot.maryland.gov

Dear Caryn,

Pending Request

At the Interagency Working Group (IAWG) meeting to the I-495/I-270 Managed Lanes Study (Study) held on May 8, 2019, you asked to be notified by May 29th if there are substantive issues that would preclude any agency from concurring on the proposed list of alternatives retained for detailed study (ARDS). Specifically, you asked for informal input on whether the ARDS recommended by MDOT SHA would meet the Purpose and Need and are adequate to support moving ahead with detailed study required for the draft environmental impact statement (DEIS). We recognize that your request is in anticipation of MDOT SHA seeking cooperating agency concurrence to the list of ARDS by June 12, 2019.

In response to that request, the purpose of this letter is to inform you that the technical staff of The Maryland-National Capital Park and Planning Commission (M-NCPPC) will recommend that its governing body not concur with the ARDS selection as currently proposed. We have made clear throughout our interaction that M-NCPPC is the regional planning agency and the steward of the natural and built environment for both Montgomery and Prince George's Counties as established by state law. In that regard, M-NCPPC must be assured that a comprehensive analysis of the alternatives selected to move forward in the Study include not only environmental protection measures, but also reasonably reflect best practices in transportation and land use planning to responsibly assess potential project impacts. We anticipate presenting our staff recommendation during a meeting of the M-NCPPC that is being scheduled for next week, on June 6, 2019.

With that in mind, it is understood that our staff comments and observations are informational in nature and offered at this time for the convenience of MDOT SHA. More importantly, although we will continue to cooperate in MDOT SHA's effort to maintain an ambitious schedule, you have acknowledged that this response does not constitute the M-NCPPC's final comment and does not, in any way, preclude our governing body from providing substantive comments on the question of concurrence that may differ from those included below.

Background

As a cooperating agency, M-NCPPC has been very engaged with MDOT SHA and the IAWG team during every stage of review in the Study, and we take our role and our responsibilities very seriously. By memorandum dated May 1, 2019, we provided detailed comments to the draft ARDS Paper presented to the IAWG at the April meeting. We understand that many of those comments can be addressed as the Study progresses from the ARDS to the Preferred Alternative. However, there are several basic decisions in the selection of the ARDS that are critical before the required studies can reasonably begin.

Multi-Modal Scope for Both Counties

In addition to those needs as listed below, MDOT SHA's official response to Post-Concurrence Comment to the official statement of Purpose and Need[1] received from Cooperating and Participating Agencies included the following:

> "Language has been added to the Purpose and Need regarding multimodal mobility and connectivity of regional roadway and transit system. Transit elements and alternatives are being considered as well as high-occupancy vehicle lanes and high-occupancy toll lanes."
>
> - Accommodate Existing Traffic and Long-Term Traffic Growth.
> - Enhance Trip Reliability.
> - Provide Additional Roadway Travel Choices.
> - Accommodate Homeland Security.
> - Improve Movement of Goods and Services.

The purpose of the Study, to develop a travel demand management solution that addresses congestion, trip reliability and enhances existing and planned multimodal mobility and connectivity requires solutions for both regional and local travel needs.[2]

The ARDS must include meaningful transit elements that serve both needs. Simply allowing buses to use the managed lanes is not enough to address a NEPA required multimodal solution or a publicly desired *local* serving transit alternative. Reducing the I-495 and I-270 congestion can and should be handled through a combination of added capacity where appropriate and providing the means to reduce the number of vehicles travelled. Accommodating existing traffic and long-term traffic growth is about moving people, not just moving vehicles.

Express buses on the managed lanes are limited in their service in the same way that other vehicles are limited by the managed lanes. Direct access on and off the managed lanes, and access between the managed and general-purpose lanes indicate that the managed lanes are driven more toward a regional traffic solution than a solution for local highway users. Therefore, in addition to addressing the

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[1] Although M-NCPPC did not concur on the Purpose and Need document, we understand that the next step in the process is to consider whether the selected ARDS meet the Purpose and Need as concurred upon by FHWA.

[2] As we note again at the outset, based upon local transportation master plans approved in Montgomery County after many years of analysis by experienced transportation and land use planners, the I-270 corridor has been considered appropriate for expansion, while the very constrained I-495 corridor in that county never has.

deficiencies in appropriate access to and from the managed lanes, each of the selected ARDS must incorporate a local serving transit system, both as a critical element to the overall design and as a supplementary component for detailed study of the ARDS as the Study moves toward a Preferred Alternative. These elements could include planning and funding planned route service such as the Corridor City Transitway and the MD Route 355 bus rapid transit (BRT), and a meaningful commitment of a portion of the toll revenue to fund public transit investments[3]. To similar effect, Prince George's County has developed a series of Sector Plans and Master Plans to anticipate parallel roadways and accommodations for multimodal uses in an effort to help alleviate congestion.

Project Segmentation and Phasing

We have requested at each stage of the Study that MDOT SHA pursue a revised approach to the segmentation and phasing of the Study, and we continue to do so. The segmentation selected by MDOT SHA demonstrates a lack of understanding of the local transportation problems, travel demands and constraints on I-495 and I-270. When viewed from a long-range need, the I-270 section of this Study with the addition of the northern portion of I-270 from the Frederick County line and connection along I-495 between the I-270 Western Spur and over American Legion Bridge is the priority corridor in Montgomery County (Western Corridor).

In Prince George's County, the segmentation selected by MDOT SHA fails to account for significant land use and transportation plans that already exist within the development pipeline and, for example, how they will impact MDOT SHA's proposed selection of interchanges. One such development is the new University of Maryland Capital Region Medical Center, located in Largo Town Center with access from the Arena Drive exit off I-495. It will have 205 private rooms, a Level 2 Trauma unit with 45 treatment bays and include the Mount Washington Pediatric Hospital with an additional 15 beds. The ability to get to this new facility from any managed lane alternative is of paramount importance to and must be addressed directly in any alternative considered.

Undisclosed Data

Without sufficient background data that indicates otherwise, it would not be prudent or reasonable for M-NCPPC to concur on moving the ARDS forward as proposed. In this regard, without offering any explanation, MDOT SHA has declined to honor our request for basic underlying data, particularly its origin/destination studies.

Nevertheless, based on information pertaining to Montgomery County that we have gleaned from the public workshops and other sources, we understand that the projected traffic volumes for 2018, 2025 and 2040 are consistently higher on I-270 than on I-495. And according to the limited origin/destination data we have been able to find, almost 30% of the destination for southbound passenger vehicles travelling southbound on I-270 is bound for the American Legion Bridge, and almost 20% of the destination for passenger vehicles travelling southbound from I-95 via I-495 to the west is bound for the American Legion Bridge. Therefore, our staff would insist that MDOT SHA first focus on the Western

[3] This is an industry-standard practice with managed lane facilities and is now being implemented on the I-66 (I-66 Transform project) in Virginia.

Corridor, transportation demand management (TDM) improvements to I-495, and diversion of regional traffic to the ICC between I-95 and I-270. The constrained section of I-495 between the I-270 west spur and I-95 should only be examined after the Western Corridor and TDM is addressed. Even more difficult, however, our agency staff has not been afforded the opportunity to review any comparable data for Prince George's County.

Scope of Project and (Study)

MDOT SHA has not afforded our agency a coherent explanation for terminating the project in Prince George's County in the vicinity of I-495 and Route 5 (Branch Avenue). According to statements made by the Secretary of the Maryland Department of Transportation, the Virginia Department of Transportation (VOOT) will determine the design of this segment at some unspecified point in the future.

The State of Maryland apparently intends to rely upon the Commonwealth of Virginia to design and implement a segment of I-495 that provides access to the most significant economic assets in Prince George's County – that also includes one the most challenged north-south connections to the District. It is unclear what incentive the Commonwealth of Virginia has to ensure safe, accessible and reliable travel to the National Harbor community that includes MGM. It is also unclear what interim condition that segment of I-495 will experience between the completion of improvements terminating south of MD 5 and the implementation of a design alternative determined by VDOT.

Conclusion

In summary, the staff concludes that the following issues must be addressed in order to justify recommending anything other than a vote of non-concurrence by M-NCPPC on the ARDS:

- Realistic incorporation of local transit components for each of the ARDS;
- Adjustment to the segmentation and phasing of the Study to address roadway improvements in the pipeline;
- Further disclosure and explanation of the data used to support key baseline assumptions; and,
- Adequate accounting for the project terminus at MD 5 in Prince George's County.

As we have indicated by Carol Rubin's previous email, representatives of M-NCPPC will make ourselves available for further discussions, including a Principals + One meeting.

Sincerely,

Carol S. Rubin
Special Project Manager
Montgomery County Planning Department

Crystal Hancock

Crystal S. Hancock
Acting Planning Supervisor
Prince George's County Planning Department