From:	Rogers, Elizabeth C.
То:	MCP-Chair
Cc:	Brewer, Robert G.; James D. Policaro
Subject:	Testimony for Public Hearing on Corridor Forward Plan (Agenda Item #4)
Date:	Wednesday, December 8, 2021 11:39:50 AM
Attachments:	Letter to Planning Board Regarding Corridor Forward Public Hearing Draft (12 8 21)(4360413.1).pdf

Dear Chair Anderson and Members of the Montgomery County Planning Board,

Please find attached our written testimony on the Public Hearing Draft of Corridor Forward: the I-270 Transit Plan.

Thank you for your consideration of our comments.

Best, Elizabeth Rogers Robert Brewer

Elizabeth C. Rogers, Attorney

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Elizabeth C. Rogers Attorney 301-841-3845 ecrogers@lerchearly.com

December 8, 2021

VIA ELECTRONIC DELIVERY

Mr. Casey Anderson, Chair and Members of the Montgomery County Planning Board Maryland-National Capital Park & Planning Commission 2425 Reedie Drive, 14th Floor Wheaton, MD 20902

Re: Corridor Forward – I-270 Transit Plan Testimony of Lerner Enterprises

Dear Chair Anderson and Members of the Planning Board:

Our firm represents Lerner Enterprises, LLC, the owner and master developer of Black Hill – a multi-phase, mixed-use development located on approximately 107 acres north of the Germantown Town Center, and just south and east of Black Hill Regional Park (the "Property"). The purpose of this letter is to provide the Planning Board with comments on the Public Hearing Draft of the Corridor Forward Plan (the "Public Hearing Draft"), particularly as it relates to recommendations for the Corridor Connectors.

The Public Hearing Draft "re-envisions the master planned [Corridor City Transitway] as the Corridor Connectors, a network of more buildable dedicated bus lanes, which connect I-270 corridor communities to the county's existing and planned rapid transit network." (*See* page 6). The Corridor Connectors include six different components that collectively provide service to Germantown, Clarksburg, Great Seneca, Lakeforest, and Montgomery Village. The Property would be served by the "Manekin West Connector." The Manekin West Connector provides service between the Germantown Town Center, and ultimately the MD 355 BRT line, and appears to terminate at or near the Property. We support the Public Hearing Draft's objective to implement the purpose of the CCT by bringing transit options to Up-County in the nearer term in a manner that overcomes certain barriers. However, we want to ensure that the Public Hearing Draft does not unnecessarily impede future connectivity across I-270. The Public Hearing Draft recommends eliminating "the expensive grade-separated interchanged planned for Dorsey Mill and Century Boulevard," given that the interchange is "no longer necessary" and its elimination will "reduc[e] implementation cost of rapid transit." (*See* page 32). The Public Hearing Draft goes on to state that "[w]hile vehicular access is no longer necessary" over I-270, "pedestrian/bicycle connective over or under I-270 [should] continue to be explored." (*See* page 32).

Simply because the Dorsey Mill Road bridge connection is no longer "necessary" for transit use does <u>not</u> mean that this connectivity is no longer desirable for general vehicular connectivity. Lerner Enterprises has invested a considerable amount of money in engineering and designing this grade separate interchange – in fact, Lerner Enterprises spent \$2,039,426 for which it has certified transportation impact tax credits through an agreement with MCDOT in February, 2019. Furthermore, the Dorsey Mill Road bridge is included in the County's current Capital Improvements Program. This bridge provides an important, multi-modal east-west connection between existing and planned residential, commercial and mixed used developments, as well as parks and recreational areas, on both sides of I-270 in Germantown.

Given the significant financial investment that has already been made by Lerner Enterprises in the design and engineering for this crossing, we urge the Planning Board to include explicit language in the Corridor Forward Plan that recognizes the importance this Dorsey Mill Road bridge crossing will have for vehicle, bicycle and pedestrian connectivity, even if this connection is no longer deemed "necessary" for the current transit network. We appreciate your consideration of our comments.

Sincerely,

Robert G. Brewer, Jr.

Elizabeth C. Rogers

Cc: James Policaro

From:	Coello, Catherine
To:	MCP-Chair
Subject:	FW: Memo from Director Conklin re Corridor Forward
Date:	Wednesday, December 8, 2021 9:37:53 AM
Attachments:	image001.png
	12-8-21-Corridor Forward the I-270 Transit Plan MCDOT Comments on the Public Hearing Draft.pdf

From: Jeffrey, Heather <Heather.Jeffrey@montgomerycountymd.gov>

Sent: Tuesday, December 7, 2021 3:16 PM

To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>; Coello, Catherine <catherine.coello@mncppc-mc.org>

Cc: christopher.conklin@montgomerycountymd.gov; Henn, Hannah

<Hannah.Henn@montgomerycountymd.gov>; Erenrich, Gary

<gary.erenrich@montgomerycountymd.gov>; Bossi, Andrew

<Andrew.Bossi@montgomerycountymd.gov>; Pitts, Corey <corey.pitts@montgomerycountymd.gov>;

Conklin, Joana < Joana.Conklin@montgomerycountymd.gov>

Subject: Memo from Director Conklin re Corridor Forward

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Please see the attached Memo from Director Conklin regarding Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft.

Thank you,

Heather Jeffrey Senior Executive Administrative Aide Office of the Director Montgomery County Department of Transportation 101 Monroe Street, 10th Floor Rockville, MD 20850 <u>heather.jeffrey@montgomerycountymd.gov</u> or 240-777-7168 Follow us on Twitter: MCDOT@MCDOTNow



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Marc Elrich County Executive Christopher R. Conklin

Director

DEPARTMENT OF TRANSPORTATION

M E M O R A N D U M

December 8, 2021

- TO: Casey Anderson, Chair Planning Board
- FROM: Christopher Conklin, P.E., Director, Department of Transportation (MCDOT)
- SUBJECT: Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft

Thank you for the opportunity to review the Fall 2021 Public Hearing Draft for Corridor Forward: the I-270 Transit Plan ("Corridor Forward" or "the Plan"). Over the last several months, MCDOT staff has been working closely with Planning staff on many aspects of this plan. We greatly appreciate the time and effort that the Planning team members have dedicated to work collaboratively with us to strengthen the final product to facilitate eventual implementation by MCDOT. We strongly support many aspects of this plan, including the prioritization of the MD 355 and Veirs Mill BRT lines as well as the prioritization of other transit, bicycle, and pedestrian improvements in the corridor.

However, we have some concerns with the recommendations in their current form and believe further refinements are necessary. As we have been meeting with Planning staff over the last several weeks, it is our understanding that these issues will be discussed during the upcoming work sessions, and we are hopeful that many of them will be resolved and addressed in the Planning Board draft. The comments below summarize our most significant concerns.

1. <u>Additional Transit Services:</u> The Plan presents conflicting or absent information on important existing projects. Notably, the Great Seneca Transit Network and the North Bethesda Transitway are both in active development and should be reflected as near-term priority transit services. The North Bethesda Transitway is included in the Constrained Long Range Plan (CLRP) and the Countywide Transit Corridors Functional Master Plan.

Office of the Director

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Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft December 8, 2021 Page 2 of 5

In addition, its implementation has been accelerated by Council in the CIP due to its importance as an east-west connector between MD355, White Flint, Rock Spring, and potentially Northern Virginia via I-270. Facility Planning on this project began this year, and it should be treated as important a connector as the other new connectors identified in the Plan's near-term transit network. While support for the North Bethesda Transitway is included as a supplemental recommendation in the Plan, we feel strongly that it should be given a higher priority and included in the recommended near-term transit network.

Similarly, the plan largely ignores MCDOT's Great Seneca Transit Network (GSTN) project, which has been funded by Council for advancement of the first two service lines into construction. This project is critical to further development of the life sciences center, and support for it should be emphasized in the Plan's recommendations. GSTN is incorrectly described seemingly as an afterthought in the Plan as an "operational improvement" but it includes infrastructure investment relevant to Corridor Forward such as dedicated transit lanes, transit signal priority, and upgraded bus stations. We strongly urge the Planning Board to include GSTN more prominently either in the near-term transit network or as a supporting recommendation.

Information on the North Bethesda Transitway also appears to establish the eastern terminus at White Flint, despite past efforts choosing to leave this option open between White Flint or Grosvenor until the two could be more fully evaluated during Facility Planning. We recommend that the eastern terminus not be established as part of this plan's efforts.

2. <u>I-270 Express Bus Service:</u> The Plan presents conflicting or absent information on operating bus services along I-270, such as in the State's proposed Managed Lanes (recently renamed "Op Lanes"). The County has been advocating heavily with the State to include transit in the proposed project, and it is important that Corridor Forward reinforce the importance of providing transit service if the project moves forward.

The Plan should evaluate how to best use these lanes, such as identifying activity centers, potential Park & Ride locations, dedicated bus access along local roadways, and associated right-of-way needs to support these uses. It is also important to identify right-of-way requirements at points crossing I-270 and potential facility connections needed at interchanges and on bridge structures.

With or without the Op Lanes project, there is a market for highway-running express bus service and park-and-ride access in the corridor to serve upcounty residents who do not live within practical distance to a BRT or future Red Line station. The transit solution for this corridor will necessitate a wide variety of options, including support for express bus services.

Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft December 8, 2021 Page 3 of 5

3. <u>Red Line Extension:</u> The Plan's recommendation for a Red Line extension is not adequately supported by the analysis and lacks the appropriate degree of feasibility study for inclusion as a primary recommendation in the Plan. As mentioned in the Plan, there are significant technical hurdles to realizing this recommendation, many of which have not been studied in any level of detail to realistically support the recommendation. For example, it is unclear whether an additional 100+ feet of right-of-way would be able to be dedicated along the CSX track, or if CSX would even allow for a parallel heavy rail service along their line. Operational considerations, such as downstream capacity, have not been studied or considered in any meaningful way. In addition, given the substantial maintenance backlog, WMATA is appropriately focused on state-of-good repair, so it is unclear if they would support a system expansion.

Notwithstanding these and other significant technical constraints, the analysis shows that the costs of a Red Line extension far outweigh the anticipated benefits. The estimated cost is \$1.6-2.5 billion, and the project is only anticipated to generate about 5,000 new transit trips in the county by 2045 (increase of 0.14% transit mode share), a VMT reduction of 157,000/day (-0.07% of the County's daily total VMT), and an increase of 2,000 jobs (+0.1% impact to County). By means of comparison, the MD355 BRT project, with an estimated cost that is half that of the Red Line Extension, is expected to increase transit ridership in the corridor by 8,000 to 9,000 per day and reduce daily VMT by more than 700,000. The results of the Corridor Forward analysis seem to indicate that investment in high-quality, bus-based transit provides a higher return-on-investment than rail expansion.

While MCDOT is concerned with the wisdom of this recommendation, if the Planning Board decides to keep the Red Line extension in the Plan, we request that the following changes be considered with regard to this recommendation:

- Add flexibility to consider other potential alignments and station locations (such as an alignment to Lakeforest, which is slated for major redevelopment and could have potential for a transformative transit-oriented development project).
- The implementation plan item for this recommendation should be to conduct a feasibility study, which could include items A-E currently listed in the plan. Items F and G should be deleted, as it is premature to generate advocacy for the concept (and one could argue this is not appropriate to be included in a master plan), and it is also premature to recommend anything related to NEPA or inclusion in the CLRP at this time.
- 4. <u>Corridor Cities Transitway (CCT)</u>: The CCT has already obtained right-of-way dedication and accommodating design commitments from developers, notably at the Belward and PSTA sites. This plan as drafted would remove the requirement for transit

Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft December 8, 2021 Page 4 of 5

> infrastructure through these future developments, seeming short-sighted and not aligned with goals to promote transit-oriented development. There are also communities and major generators served by the original CCT that are no longer served by the Corridor Forward proposal, such as the Universities at Shady Grove, King Farm, and Crown Farm/RIO. While we are open to considering modifications to the CCT, we are hesitant to endorse specific changes until we are fully confident that the alternatives proposed adequately serve the transit needs of the area. Specifically, we suggest that the newly proposed alignment along Gude Drive be reconsidered to be on Shady Grove Road or Redland Boulevard, both of which have more supportive transit land use. Additionally, the draft's implementation plan needs to make clear that the responsibility for implementation of connectors such as the Great Seneca and Life Sciences should be a State responsibility as a continuation of work on the CCT.

- 5. <u>MARC Stations:</u> The recommendations regarding MARC stations do not appear to have adequate supporting analysis. They need to more directly address technical constraints of a potential MARC Station at Shady Grove, as well as how the addition of two new stations would affect lower-ridership stations such as Washington Grove or Garrett Park. This draft also presents some unclear information as to the role of the Metropolitan Grove station in relation to the proposed transit hub at I-270 and MD 124 and recommends relocating this station to align with the proposed Red Line extension. We suggest language be added to clarify that this recommendation is contingent on feasibility studies for the Red Line extension feasibility.
- 6. <u>Germantown / Clarksburg Dedicated Lanes:</u> The Plan proposes several branches to the MD 355 BRT line. It is important to bear in mind that each branch of a line can directly affect the bus frequency along the trunk of that line, and the MD355 BRT project to date has not considered buses accessing the trunk line from feeder locations. While Planning staff indicates that Corridor Forward is a plan for infrastructure and not for transit service, the proposed configuration included in the Plan could result in necessary changes to accommodate service levels for a project that is currently in design.
- 7. <u>Treatment of Right of Way:</u> In the Plan's right-of-way tables on pages 40-41, it is unclear what is meant by the footnote "provision of transit lanes required" on these roadways. Required when? And why is this a requirement rather than a recommendation given that no traffic analysis or engineering has been done to verify a specific requirement on these corridors? In addition, we believe the recommendation in Table 15 to "eliminate capital improvement projects that support the addition of new travel lanes and turn lanes" is overly restrictive and confusing (and, in some cases, in conflict with Planning Board's project prioritization for projects such as MD355 widening and Observation Drive construction). This recommendation may also conflict with or restrict minor roadway and intersection modifications needed to optimize and support transit options and identify the options that warrant planning, design, and implementation as funding

Corridor Forward: the I-270 Transit Plan MCDOT Comments on Public Hearing Draft December 8, 2021 Page 5 of 5

opportunities become available." The recommendation in Table 15 falls outside of the purpose of this plan and should be deleted. The ROW requirements are already specified earlier on pages 40-41 as they relate to transit, so that should be all that is needed.

We appreciate the Planning Board's consideration of these concerns, and again, we would like to thank Planning staff for continuing to work with us on improvement of this very important plan that is likely to inform investment in I-270 corridor transit improvements for years to come. Should you have any questions regarding our comments on the Plan, please feel free to contact me or Ms. Hannah Henn, Deputy Director, at <u>hannah.henn@montgomerycountymd.gov.</u>

cc: Hannah Henn, MCDOT Gary Erenrich, MCDOT Andrew Bossi, MCDOT Corey Pitts, MCDOT Joana Conklin, DGS

From:	Paul Goldman
To:	MCP-Chair
Subject:	"Corridor Forward" Plan for Transit in the I-270 Corridor
Date:	Tuesday, December 7, 2021 5:39:41 PM
Attachments:	2021-12-09 Revised Corridor Forward Testimony Action Committee for Transit.pdf

Action Committee submits the attached revised testimony that corrects several errors in the testimony we previously submitted for the December 9 meeting on the Corridor Forward Plan. Please substitute the attached file for the testimony we submitted on December 3.

Paul Goldman President, Action Committee for Transit



Montgomery County's Advocates for Better Transportation

P.O. Box 7074, Silver Spring, MD 20907

"Corridor Forward" Plan for Transit in the I-270 Corridor

Testimony to Montgomery County Planning Board, December 9, 2021

For 60 years, Montgomery County planners have tried to create walkable, transit-oriented new towns north of Rockville. For 60 years, they have failed. But the staff draft Corridor Forward plan makes no effort to change course. Rather than trying to correct the mistakes of the past, it preserves the policies and practices that create auto-oriented suburban sprawl. Even where it proposes new bus lanes, it runs them along pedestrian-hostile high-speed highways where buses will never be attractive alternatives to driving.

The draft recommends prioritizing a Red Line extension to Germantown over MARC. This project would require an entirely new right of way and does not meet WMATA criteria for Metrorail projects. MARC service, unlike the Red Line extension, can be increased incrementally as funds are available. The practical effect of prioritizing the Red Lline would be to reject any new rail transit service in the upcounty for the indefinite future.

The rationale given for this recommendation is cost-effectiveness. The project consultants calculated that spending \$1.2 billion on MARC will yield 3800 added transit rides per weekday, while spending \$1.5 billion on the Red Line will yield 8400 new rides. But estimates of cost and ridership are quite uncertain at the study's level of analysis, and the consultants' analysis (summarized on pages 21-27 of Appendix 3) is heavily slanted to favor the Red Line over MARC.

We believe that a realistic analysis would show MARC expansion to be more cost-effective. And beyond that, MARC expansion has great advantages that cost-effectiveness analysis does not capture. Expanded MARC service should be the highest priority for transit upgrades in this corridor, both short-term and long-term.

Cost

The number of new MARC trains you get per dollar of new track is the outcome of a negotiation with CSX, rather than a direct outcome of the engineering. The study says \$1.2 billion will get you only 16 added round trips per day. This is very pessimistic. The 2007 MARC Growth & Investment Plan said \$530 million gets you that many round trips or more.

The MNCPPC consultant's assumptions for the MARC third track seem to be based on the MTA's MARC Cornerstone Report, which we see as largely an exercise in coming up with excuses for not expanding MARC service.

The 2007 MARC plan assumed third track is needed only from Point of Rocks to the Beltway. The Cornerstone Plan, like the consultant report, assumes it must go all the way to Union Station. Not only that, it lists the track between Silver Spring and Union Station as the first critical-path item for added service. Since this is the most difficult and expensive section to build new track, it basically rules out sequential improvements. It is also contrary to common sense, because you would think a passing track would be most useful to CSX in the middle of the two-track section between Brunswick and Ivy City, not at one end. (To preserve the option of maintaining current freight capacity by turning off-peak trains around before they reach the two-track section, Corridor Forward should amend the White Flint master plan to provide right of way for pocket tracks at the future White Flint MARC station.)

While overstating the likely cost to run MARC trains, the consultants low-balled the cost of a Red Line extension. They first estimated this cost at \$1.8 billion. But they reduced this number to \$1.5 billion, contrary to their own opinion, at request of MCDOT (see appendix p 26). The effect of prioritizing the Red Line is to postpone any added rail service into the indefinite future. The upcounty deserves more train service.

Ridership

The study assumes (see appendix p 6) I-270 is widened north of Shady Grove, with 4 southbound and 5 northbound lanes between Clarksburg and I-370, and 4 lanes in each direction between Clarksburg and Frederick. MDOT's contract with Transurban makes this widening very unlikely without a giant state subsidy.

With the assumed widening of I-270, 39% of the new transit trips predicted for a Red Line extension to Germantown are from people who live outside Montgomery County (see p 38 of this staff report). However, if I-270 is not widened north of Germantown, MARC trips originating in Frederick County would be much more attractive and driving on I-270 to a Germantown Red Line station would be less attractive.

Moreover, even if Transurban eventually builds HOT lanes to Frederick, it will manage the tolls to keep traffic highly congested at the Clarksburg merge point. We doubt that the consultant's traffic modeling took this into account.

The ridership model assumed that future jobs and population in the downcounty downtowns of Silver Spring, Rockville, and Bethesda are constrained by current zoning. This is not a reasonable assumption for a study that predicts 2045 ridership, let alone for infrastructure upgrades that will shape land use for a half-century and more. Master plans for the county's built-up downtowns only designed to accommodate growth for 10 or 20 years and are regularly updated to reflect growing regional population and the increasing demand for walkable urbanism. All-day MARC service will significantly upgrade transit access to Rockville and Silver Spring, whereas a Red Line extension would not add rail service anywhere south of Shady Grove. Ridership predictions for MARC should reflect residential and job growth in the downtowns that get new service.

Perhaps as a result of these assumptions, the consultants estimate added MARC ridership in 2050 at only 20% of the new seats. This seems very pessimistic when the Brunswick Line was running close to capacity before Covid.

Other benefits of all-day MARC

This highly uncertain cost-benefit calculation is entirely the wrong basis for a transportation choice that will play out over decades. No one can say with any confidence today whether a Red Line extension or a MARC third track will attract more new riders per dollar. The plan should start from our overall planning goals, decide which of these two transit lines best serves them, and then examine what needs to be done to make that choice cost-effective.

From this point of view, all-day MARC service is clearly the superior alternative. Advantages not considered in the study include:

- By creating another axis of all-day transit service, it would strengthen the transit-oriented nodes of Silver Spring, White Flint, and Rockville and create new nodes in Kensington, Gaithersburg, and Germantown by making car-free living far more convenient.
- Expansion of MARC service can begin now, with more trains added sequentially as sections of new track are built. Prioritizing Red Line extension, which requires one giant expenditure, postpones any action into the indefinite future. The upcounty should not wait decades for more train service.
- Two-way MARC service would give Montgomery County transit riders access to the walkable downtowns of Frederick and Brunswick, and potentially to Hagerstown.

Even with its slanted assumptions, the study predicts 26 new riders per new train trip for the Red Line extension versus 119 per new train trip for MARC. This is further evidence of MARC's effectiveness in serving the county's land-use planning goals.

Bus upgrades

Like many past planning documents, Corridor Forward promises change in lofty generalities and then entrenches the status quo in its specifics. Its proposed bus lane network exemplifies this problem.

The report promises to "limit the addition of non-transit travel lanes" (p. 10) and recommends that the county "convert existing auto travel lanes to dedicated transit lanes" (p. 45). But a footnote on page 40 renders these words utterly meaningless: "Ultimate number of lanes and right-of-way width to be determined by traffic study."

Allowing a "traffic study" to determine the size and design of a city street -- let alone a transitway -- is the negation of sound planning. Traffic studies design roadways to avoid traffic congestion. This inherently privileges drivers over pedestrians and transit riders. Traffic jams in urban places are a sign of success; a downtown with no traffic backups is a failure. In a transit-oriented area, and especially along a transitway, streets must be designed primarily for walkability and only secondarily for the movement of private motor vehicles.

Another symptom of Corridor Forward's automobile-first orientation is the excessively wide transitway rights of way. Even "business district streets" are 100 to 136 feet wide -- wider than

Wisconsin Avenue in downtown Bethesda. Wide multi-lane highways are a barrier to pedestrian movement.

A bus that stops along a 6-lane highway with traffic whizzing by at 40, 50, or 60 miles per hour will always be second-class transportation, with few riders other than those who can't drive or can't afford to drive. Bus lanes and fancy bus shelters will not fix that. Corridor Forward must amend existing master plans to make the transitways true transitways. That requires narrower rights of way, design speeds of 30 mph or less, elimination of plans to add lanes to existing highways, and a ban on slip lanes, extra right-turn lanes, and double turn lanes.

In one area, Corridor Forward does recognize and correct past mistakes. This is the alignment of the Corridor Cities Transitway. We support the plan's revision.

Conclusion

Just five months ago, the Planning Board passed judgment on past efforts to make the upcounty transit-oriented. These words were included in the Great Seneca Science Corridor Minor Master Plan Amendment:

Development has not achieved the urban style form envisioned; the form of the built environment remains relatively unchanged. New development, although it employs best design practices like high quality construction materials and infill redevelopment of surface parking lots, remains primarily suburban and auto-centric in form.

Corridor Forward, as now written, perpetuates the bad choices that caused this failure. It pushes expansion of rail transit off into the indefinite future by ruling out any added MARC train service. And it envisions buses as a second-class form of transportation, fated to carry a disadvantaged minority of travelers. The upcounty needs a much more ambitious transit plan, centered on all-day MARC service.

From:	Parker, Jonathan
То:	<u>MCP-Chair</u>
Cc:	Kannan, Shyam; Sullivan, Regina A.; Scott, Charlie; Segerlin, Steven C.; Davis, Allison; Parker, Jonathan; Kim, Melissa L.; McVary, Jessica; McGowan, Jesse; Reed, Patrick; Erenrich, Gary
Subject:	Metro's Comments on Corridor Forward: The I-270 Transit Plan Public Hearing Draft
Date:	Tuesday, December 7, 2021 5:09:32 PM
Attachments:	2021-12-07 WMATA I-270 Corridor Forward Draft Comments.pdf

Mr. Chair,

Please see the attached I-270 transit plan comments sent on behalf of Shyam Kannan, Vice President of Planning at Metro.

Thank you,

Jonathan Parker, PE, AICP Strategy, Planning and Program Management Washington Metropolitan Area Transit Authority <u>jhparker@wmata.com</u> 202-962-1040 December 7, 2021

Casey Anderson, Chair Montgomery County Planning Board 2425 Reedie Drive, Wheaton, MD 20902



Metro's Comments on Corridor Forward: The I-270 Transit Plan Public Hearing Draft

Dear Mr. Anderson,

Re:

On behalf of the Washington Metropolitan Area Transit Authority (Metro) we are submitting comments on the Corridor Forward: The I-270 Transit Plan ("the draft plan"), Public Hearing Draft. Metro appreciates the opportunity to comment on the draft plan.

The draft plan recommends the following investments, among others:

- Prioritizing MD355 and Viers Mill Road Bus Rapid Transit (BRT) projects,
- Recasting the Corridor Cities Transitway as a "corridor connector,"
- Supporting MARC Brunswick Line right-of-way acquisition,
- American Legion Bridge improvements to allow rail transit (to support a possible Purple Line extension),
- Updated supporting master land use plans, and
- An extension of the Metrorail Red Line to Germantown Town Center, with two intermediate stations at Old Town Gaithersburg and MD124.

Metro applauds the intent to advance high-capacity transit solutions throughout the region and is currently working collaboratively with jurisdictions to advance major initiatives. We appreciate county planning staff's coordination with us and inclusion of some of Metro's priorities in the public hearing draft report. Metro is willing to consider its support of the plan with the Planning Board and County's additional consideration and responses to our comments below.

Metro would also like to emphasize the following points for your consideration.

We suggest that some form of MARC Brunswick Line improvements, similar to those envisioned in the Greater Washington Partnership's Capital Region Rail Vision, coupled with planned BRT investments and focused master planning, may offer a more cost-effective solution to the needs of the I-270 corridor. Given that the MARC Brunswick Line already serves much of the corridor, enhanced bus, BRT and MARC service, including 15-minute peak and all-day bidirectional service called for in the Rail Vision, may offer more robust benefits to the higher growth and equity mid- and east-county communities noted in the draft plan. Moreover, if MARC service is eventually extended into Virginia via a new planned Long Bridge crossing, additional Brunswick Line trips to L'Enfant Plaza, Crystal City and beyond, would expand job access opportunities for communities on both sides of the Potomac beyond those assumed in the draft plan. Regarding the implementation challenges and other concerns noted in

Washington Metropolitan Area Transit Authority

600 Fifth Street, NW Washington, DC 20001 202/962-1234

wmata.com

A District of Columbia, Maryland and Virginia Transit Partnership the draft plan, the county could engage with MTA and regional stakeholders refine the assumptions in the Cornerstone Plan and Rail Vision to better reflect the county's needs.¹

- With respect to discussions surrounding extensions to Metrorail, Metro has indicated previously and consistently that any further extension of Metrorail can only be contemplated after solutions and funding commitments have been made that remedy Metrorail's existing core capacity issues. Metro remains committed to this position.
- The envisioned Red Line Metrorail extension does not meet the Authority's minimum guidelines for density, ridership, and connectivity, as noted in the report. For the proposed Red Line extension to be a responsible and effective regional investment, the corridor's proposed station areas would need to accept significant land use changes and increases in population and employment density.
- Metro is legislatively required to keep annual operating subsidy increases at or below three percent with certain exemptions.² Although the first year operating subsidies resulting from major capital projects, such as Metrorail extensions, are excluded from the three percent cap, subsequent operating subsidy payments resulting from such projects are not. As a result jurisdictional financial capacity will likely constrain the region's ability to financially support major new investments and additional operating and maintenance costs beyond Metrorail's current footprint for the foreseeable future.
- Prior to advancing any future Metrorail extension, Metro staff will need to conduct an independent study to understand impact of the proposals on the agency's capital assets and operations and maintenance needs.
- The proposed Metrorail Red Line extension would require significant capital investments and entail considerable implementation risks. As the plan notes, a new railyard would need to be built adjacent to the corridor at or near the proposed terminus, resulting in a locally unwanted land use along an already modestly developed corridor. Based on the draft plan's assumed alignment, implementation would require successful negotiation with and right-of-way acquisition from CSX Transportation, the Brunswick Line's owner, for use of the railroad corridor at their sole discretion. The report should make clear that locating a new rail yard facility adjacent to the corridor and acquiring new right-of-way from CSX would be a challenging and expensive undertaking.
- We encourage the county to arrive at consensus decision regarding BRT in the I-270 corridor. These proposed BRT routes are important to advancing the county's land use goals at the Shady Grove and Rockville Metrorail stations, where the services could have major connections. Due to capacity limitations as these locations, the transit facilities may need to be reconfigured to support the BRT services, which could add significant costs and may require additional space and reduce the land area that could be available for development. The advancement of real estate development opportunities will be dependent upon finalizing the transit facilities program.

The following are Metro's specific comments on elements of the Public Hearing Draft:

Chapter 1 – Executive Summary

¹ Aside from MTA's Cornerstone Plan noted in the draft plan, see the Greater Washington Partnership's Rail Vision found here: <u>https://greaterwashingtonpartnership.com/capital-region-rail-vision/</u>

² Northern Virginia Transportation Commission's Three Percent Cap Report can be found here: http://www.novatransit.org/uploads/WMATA/NVTC_3PctCap_FullReport_WEB.pdf

Metro appreciates that the study clearly identifies many of the challenges and constraints associated with extending Metrorail in this corridor, as briefly noted in the Executive Summary and documented in more detail in Chapters 4 and 6. These are critical considerations that should be highlighted during any Metrorail extension discussion. To highlight their importance for policy makers, Metro recommends these specific considerations be included in the Executive Summary.

- Funding commitments³ must be made for Metrorail's core capacity needs determined by Metro's documented evaluation prior to advancing any new extensions,
- An extension must meet or exceed Metro's station area land use density, ridership, and connectivity targets,⁴
- An extension's complete lifecycle investment capital investment and ongoing operations and maintenance needs – must be financially affordable for the State of Maryland and the Metro Compact members,⁵ and
- An extension must be able to navigate implementation challenges, such as building a new corridor railyard facility and acquiring right-of-way from of corridor majority owner CSX Transportation.

We appreciate that the draft plan notes the need to support transit recommendations with master plan changes and appreciate the inclusion of Metro's guidelines for density, ridership, and connectivity. Understandably, many suburban and exurban communities lack the density needed to support Metrorail and land use change takes decades. However, Metro asks that the Executive Summary be clear about the magnitude of land use changes that the county would have to implement – and the community would have to accept – along the corridor for the proposed Metrorail Red Line extension to meet Metro's guidelines.

Chapter 4 – Initial Evaluation

While we understand that the draft plan was intended to evaluate and recommend transit options to meet county goals and address challenges for an expansive I-270 corridor, we suggest that the draft plan include a more robust alternatives discussion about the appropriate roles of each mode in meeting these goals. This would allow a more nuanced understanding of land use and ridership targets for high-capacity transit (bus rapid transit, commuter rail, etc.) versus Metrorail service.

For example, the draft plan's proposed 7.8-mile Red Line extension forecasts about 8,000 riders in 2045, which assumes over two decades of corridor growth. In context, Metro's Expansion Guidelines suggest the extension should target an average daily ridership of between about 27,000 and 55,000 riders to be a financially sustainable for Metro and the region, a target three to seven times above the draft plan's forecast. While additional station area master land use planning could enhance corridor population, employment and ridership, policy makers today should be clear to the community and other stakeholders about the magnitude of changes required beyond current plans. For a regional example of how to address land use targets, we would point to Virginia Department of Rail and Public

³ Funding commitments entail Metro Board-endorsed solutions to modify the Adopted Regional System, funding commitments included in the Transportation Planning Board's adopted Long-Range Plan, and accompanying line items in jurisdictional budgets

⁴ Metro's Transit Corridor Expansion Guidelines can be found here: https://planitmetro.com/wpcontent/uploads/2015/12/Task-5-Final-Report-2015-03-25.pdf

⁵ Metro Board policy assigns capital funding responsibility for new Metrorail extensions to the jurisdiction(s) where the project is located and assigns the resulting ongoing operating subsidy and maintenance funding responsibility to all Metro Compact members.

Transportation's 2015 Route 1 Corridor Study which highlighted land use changes needed to accompany a proposed Metrorail Yellow Line extension to Hybla Valley in Fairfax County.⁶ This is important context for making an informed decision about the type of mobility solution best suited for the corridor.

Other Considerations

The three percent cap creates pressure to minimize current and future operations and maintenance (O&M) costs, even if Metrorail extension first year operating subsidies are exempted. Metro's growing capital program is mostly focused on repairing and modernizing the existing system. However, the addition of future major new capital projects would add asset ownership and operational responsibility on top of Metro's existing state of good repair backlog, unfunded capacity needs, financial obligations, and legislative mandates.



For example, as shown in the graphic above, operating subsidies resulting from the first year of operation for a Metrorail line extension would be exempt from the three percent cap. However, in every following year these resulting rail operating subsidies would become part of the baseline cap calculation. Additional subsidies such as these create external financial pressure on the agency's budget and the region, constraining Metro's ability to consider alternative investment choices. These factors, among others, necessitate the expansion prerequisites and independent evaluation process noted above.

Metro appreciates the work undertaken to date and the opportunity to comment on the draft plan. If you have any questions or would like to discuss any of the comments, please contact Jonathan Parker at <u>jhparker@wmata.com</u> or 202-962-1040.

⁶ The reference to the plan is discussed here: <u>https://planitmetro.com/2015/10/29/metrorail-core-capacity-needs-and-the-challenges-of-outward-expansion/</u>. The plan itself is here: http://www.drpt.virginia.gov/transit/planning/route-1-mutlimodal-alternatives-analysis/

Sincerely,

month

Shyam Kannan Managing Director, Office of Planning

Cc: Regina Sullivan, WMATA Charlie Scott, WMATA Steven Segerlin, WMATA Allison Davis, WMATA Jonathan Parker, WMATA Jonathan Parker, WMATA Jessica McVary, Montgomery Planning Jesse McGowan, Montgomery Planning Patrick Reed, Montgomery Planning Gary Erenrich, Montgomery DOT

I would like to make two recommendations for "Corridor Forward" about I-270. 1) Expanding MARC service is good

2) ALL of the lanes of I-270 should be tolled.

Thank you for your service and have a great holiday season.

Daniel Marcin Economist <u>dsmarcin@gmail.com</u> <u>Homepage</u>

Dear Planning Board,

Please include MARC service expansion in Corridor Forward!

Some benefits of expanding progressive public transport in this time of climate emergency are:

 \cdot The expansion can start immediately. It only requires an agreement between the freight railroad CSX and the county/state to add trains in return for public investments in track capacity. In contrast, a Metro Red Line extension would take decades, like the Metro Silver Line or (unfortunately) the Purple Line.

· All-day, two-way, seven-day service would connect walkable communities all along the whole length of the MARC line, including Silver Spring, Kensington, Rockville, Gaithersburg, Germantown, Frederick, Brunswick, and Harper's Ferry.

· Expanded MARC service would attract 4.5 times as many new riders per train trip as a Metro Red Line extension.

Thank You,

Nic

Nicolas Kotschoubey n.kotsch@ix.netcom.com 1-202-251-9699

From:	Marilyn Balcombe
То:	MCP-Chair
Subject:	Written Testimony for Corridor Forward
Date:	Friday, December 3, 2021 11:08:15 AM
Attachments:	image001.png
	CORRIDOR FORWARD.docx

Please accept my written testimony for the Corridor Forward Plan. Unfortunately, we are unable to attend the public hearing as the date conflicts with the Chamber's annual dinner. That is in no way a reflection of our interest in this plan.

Thank you.

Marilyn

Marilyn Balcombe President and CEO



910 Clopper Road, Suite 205N Gaithersburg, MD 20878 301-840-1400 x15 <u>mbalcombe@ggchamber.org</u>



910 Clopper Road, Suite 205N, Gaithersburg, Maryland 20878 (301) 840-1400, Fax (301) 963-3918

CORRIDOR FORWARD: The I-270 Transit Plan Working Draft PUBLIC HEARING – Planning Board December 9, 2021

Thank you for the opportunity to comment on the working draft of the Corridor Forward: The I-270 Transit Plan. The Gaithersburg-Germantown Chamber of Commerce has engaged in the public process and is very interested in increasing transportation capacity in the I-270 corridor. We appreciate your commitment to finding viable solutions to our transportation needs.

Unfortunately, we are unable to attend the public hearing as the date conflicts with the Chamber's annual dinner. That is in no way a reflection of our interest in this plan.

We would like to comment on several aspects of the plan.

- Red Line Metro to Germantown We understand that this is a long-term transit option and agree that the option of adding metro to Germantown would greatly increase transportation capacity.
- 2. Corridor Cities Transitway The Chamber has been a steady advocate for the CCT for the past fifteen years. A significant amount of time and money has been spent planning this transit project. The right-of-way exists to move this project forward. It is disappointing to see the project chopped in half, with no direct through line from Shady Grove, through the life science center, Gaithersburg, Germantown, and ultimately to Clarksburg. We understand the criticism that the original planned route may not be the most efficient way to get from Clarksburg to the Shady Grove Metro, but the CCT was envisioned to be so much more than that. The importance of this transit line is moving between residential hubs and commercial hubs all along the corridor, not necessarily a commuter connection from Point A to Point B. While the replacement "corridor connectors" make sense, eliminating the CCT also eliminates a critical north-south transit connection between Gaithersburg and Germantown. The proposed BRT on the East side of I-270 does not take the place of the CCT.

There is also a disconnect between this working draft and the transportation priorities of the County. As recently as the Montgomery County Road Show, both the County Council and our State Delegation were advocating for full funding of the CCT as it is currently designed.

3. Repurposing Lanes – We question the underlying assumption that existing general-purpose travel lanes will be repurposed solely for transit. As staunch advocates of the CCT, we wholeheartedly agree that BRT is most effective with designated travel lanes. We also know that it will be extremely difficult to repurpose auto lanes to make that happen. We understand that future traffic studies will determine whether repurposing lanes is feasible. Anecdotally, anyone who drives these roads on a daily basis will tell you it is impossible. The BRT options included in the plan need to assume construction of designated travel lanes and not be conditional on repurposed lanes.

4. Elimination of CIP Funding for New Travel Lanes (Chapter 6, Table 15) – We fully support the need for transit and continue to advocate for increased transit capacity. But we also need roadway improvements. Given the residential geography of the Upcounty, we rely on both. The recommendation to eliminate CIP funding for new travel lanes is not a viable option and seems misplaced in this document. This plan basically circumvents the County's budgetary process. Given the severe lack of transportation funding, it can be assumed that if a road project is already in the CIP it has been fully vetted and determined warranted. We strongly disagree with the transit plan having a blanket recommendation to eliminate existing capital improvement road projects.

Thank you for your consideration.

Contact: Marilyn Balcombe, mbalcombe@ggchamber.org

Dear Montgomery County Planning Board,

My name is Shaima Nasiri. I live in Rockville at 1018 Baltimore Rd. I'm writing to urge you to prioritize the expansion of MARC train service for the next 30 year transit plan in the I-270 corridor. Two-direction, 7-day a week MARC service has the potential to transform the communities along the I-270 corridor. Expanded MARC service, together with local bus transit, bus rapid transit, and real progress in improving pedestrian and cyclist safety are needed to ensure that Montgomery County communities are attractive to people of all ages, families, and businesses.

Two-direction, 7-day a week MARC service has many positives. By creating another axis of all-day transit service, it would strengthen the transit-oriented nodes of Silver Spring, White Flint, and Rockville and create new nodes in Kensington, Gaithersburg, and Germantown by making car-free living far more convenient. Two-way MARC service would also give Montgomery County transit riders access to the walkable downtowns of Frederick and Brunswick, and potentially to Hagerstown.

It would also provide another transportation option, alleviating the commuting chokepoints that occur when there are Metro system disruptions or major roadwork and other incidents on I-270. Currently, we have a single point-of-failure mass transit system (Metro's Red Line) which any engineer will tell you is poor design.

One of the greatest benefits is that a phased expansion of MARC service could begin immediately because the tracks already exist. More trains could be added and service expanded sequentially as sections of new track are built. In contrast, prioritizing extension of Metro's Red Line would require giant expenditures as well as an incredible amount of work which would postpone any service far into the indefinite future (the Silver Line is a pointed example).

Montgomery County should prioritize passenger rail and expand MARC service. It would benefit residents, commuters, and businesses throughout upcounty and downcounty and help the county meet climate goals.

Sincerely, Shaima Nasiri

Hello,

I am a resident of Boyds and am writing to encourage you to reverse the flawed recommendation against expanding MARC service as a part of the Corridor Forward plan.

Six-years ago, my husband and I were considering leaving our home in DC for a more peaceful setting where we could raise our future family. We settled on historic Boyds for many reasons but the biggest thing that kept us in Montgomery County rather than headed into Northern Virginia or Frederick was the access to the MARC.

The MARC train is clean, reliable, and a pleasure to ride, a VERY different experience to riding metro. The only downside to the MARC is that the service needs to be expanded to 7-days a week, two-way. What a boon to our family to be able to live in this beautiful place and have access to the city and to even more natural spaces further out towards Harpers Ferry.

In light of the climate crisis, I cannot begin to understand the decision to not expand access to an *existing* public transit option that would serve the upper portion of the county that is often left out of planning decisions. Expanding 270 is a reckless proposal and is unconscionable knowing it a) won't relieve traffic and b) doesn't encourage travel by public transportation.

I spent some time living in London and the ability to travel by train from bustling cities to natural spaces was, sadly, shocking to me. Why can't we have that here using *existing* infrastructure?

I know the pandemic has greatly impacted ridership on the MARC but this plan looks at the next 30 years of growth. I know as soon as my little ones can be vaccinated, we would absolutely use the MARC to travel into DC to show them all that the city has to offer, but we would also be inclined to visit restaurants in Gaithersburg and antique shops in Kensington that flank the MARC stations. Don't let our current, temporary, situation make us lose sight of our larger picture.

In addition to these personal reasons for wanting to expand access, the Action Committee for Transit has also alerted me to these excellent points that you should consider:

- The expansion can start immediately. It only requires an agreement between the freight railroad CSX and the county/state to add trains in return for public investments in track capacity. In contrast, a Metro Red Line extension would take decades, like the Metro Silver Line or (unfortunately) the Purple Line.
- All-day, two-way, seven-day service would connect walkable communities all along the whole length of the MARC line, including Silver Spring, Kensington, Rockville, Gaithersburg, Germantown, Frederick, Brunswick, and Harper's Ferry.
- Even according to the flawed study, expanded MARC service would attract 4.5 times as many new riders per train trip as a Metro Red Line extension.

Thank you,

Katharine Blackman Boyds, MD

Hi,

As a Montgomery County resident who has commuted to The District for many years from Germantown, Takoma Park, Silver Spring, and Garrett Park, the MARC train is by far the best option available in terms of efficiency and cost compared to driving or Metro.

I'm concerned to learn that the expansion of MARC train service along the Brunswick line is not being given high priority consideration by the planning board. As a commuter, MARC train saves me time and money and is more uniformly reliable than Metro.

Thank you for your time and consideration.

Marty Brown Garrett Park, MD

Greetings,

I am a resident of Garrett Park, Maryland, and am strongly in favor of increased MARC expansion. I would like to see more stop times in Garrett Park. This is a wonderful way to get more people taking public transportation and encourage fewer cars on the road. Please expand MARC service.

Thanks so much.

All the best, Marisa

Marisa B. Van Saanen (301) 792-9072

We need more public transportation in bus service, metro rail offerings and MARC trains. There is a huge need for more offerings in the time of day that trains run from Brunswick. There has to be a way to get the government to persuade the trains (or subsidize) to run more offerings every day - not just an early train on Fridays.

If that does not work, then we need a serious look at the monorail from Shady Grove to Frederick with stops in between.

Thank you,

Anne Sturm P.O. Box 341 Barnesville, MD. 20838

From:	liz5025@aol.com
То:	MCP-Chair
Subject:	Explore MARC expansion before committing to Metrorail extension
Date:	Monday, December 6, 2021 1:20:41 PM

"Corridor Forward" has not realistically considered what appears to be a cheaper and more rapid implementation option to extending Metrorail beyond Gaithersburg: the expansion of MARC service. Instead, your office has relied on the shaky conclusions of a flawed study. As a faithful Metro rider for many years, I am by no means opposed to its expansion BUT a viable, faster, cheaper option--MARC--would definitely be preferable. At the very least, this option should be seriously explored (i.e., not dismissed out of hand or based on unrealistic estimates). Considering the wait time of the Metro option--including the possibility that delays such as those on the Dulles extension and on the Purple Line construction--as well as the overall cost, your office needs to move forward with a comparative analysis of the MARC and Metro options that considers a range of criteria and estimates.

Elizabeth L. Malone 423 Mansfield Rd. Silver Spring, MD 20910.

Casey, please include train commuting service in the I 270 plan. This is forward looking.

Cordially,

Jonathan Bernstein

Please move forward with expanding MARC service. Expanded service will provide access to riders all along the line, and reduce auto traffic in D.C. We can make these trains available quickly, without approval of new projects and years' long construction.

Best, Melinda Salzman 1707 Black Oak Lane Silver Spring MD 20910

Dear Chair,

Please give full consideration to expansion of the MARC train service to DC. I was a train rider daily for years. It is economical to expand service compared to Metro expansion. It is the best way to get cars off I 270 to points south.

I had to stop riding the train once I had young children due to the lack of a more flexible schedule.

Thanks,

Jane Pontius

We need more Marc Trains, I truly believe that if the trains had more flexibility to them and not locked to a certain schedule More people would take advantage of them. If would be great to make appointments Please consider expanding Marc Service

I am writing in favor of expanding MARC service to DC. I have been a long time user of the MARC Brunswick line and have found it a quick and convenient means of getting from home in Germantown to Washington DC. I used to work in Rockville and commuted using Ride-On and the Metro and the time spent embarking and disembarking from the bus and train resulted in my commute being almost as long as my current commute downtown—and that's including the time it takes me to walk from Union Station to Work.

The train also is better for the environment and reduced congestion for those who, for whatever reason, must commute by car.

Giving the rapid growth in housing North of Germantown, transportation down the I270 corridor will only get worse. Please strengthen the MARC train system and promote it's use. Once people try it there is no going back.

Steve Tise 20812 Clear Morning Ct. Germantown, MD 20874

Hello,

As a long time commuter from Frederick County to Montgomery County, I was surprised to hear that MARC train expanded service is not being considered along side a red line expansion.

It seems that MARC expanded service could be a near term solution until a red line expansion could actually happen. The MARC stations are already in place and the track is already on the ground.

I urge you to reconsider including MARC train expanded service into your planning.

Thank you,

Jay Choudhary New Market, MD

Sent from my mobile

My son has a disability and is unable to drive. Because of the availability if the MARC line, he has been able to take classes, go to his doctors, go to galleries, etc.. When COVID is gone, hopefully he will be able to return to those activities.

Thank you for taking the time to consider the needs of your vulnerable constituents.

Noelie Angevine 13501 Clear Morning Pl, Germantown, MD 20874

Hello MCP-Chair,

I am writing to you to support MARC service expansion,

The expansion can start immediately. It only requires an agreement between the freight railroad CSX and the county/state to add trains in return for public investments in track capacity. In contrast, a Metro Red Line extension would take decades, like the Metro Silver Line or (unfortunately) the Purple Line.

 \cdot All-day, two-way, seven-day service would connect walkable communities all along the whole length of the MARC line, including Silver Spring, Kensington, Rockville, Gaithersburg, Germantown, Frederick, Brunswick, and Harper's Ferry.

 \cdot Even according to the flawed study, expanded MARC service would attract 4.5 times as many new riders per train trip as a Metro Red Line extension.

By expanding MARC, we reduce traffic congestion, pollution, and CO2 emissions by giving commuters expanded choices in how they move about Maryland. We also would giving remote workers expanded opportunities to live in lower cost of living communities, such as Frederick.

Thank you for your consideration,

-Steven Kraft

Steven Kraft 240-899-9915 <u>StevenKraft85@gmail.com</u> <u>https://www.linkedin.com/profile/public-profile-settings?trk=prof-edit-edit-public_profile</u>

MARC is here! Use it, expand it. Establish full day service at least up to Frederick. Don't spend the next five years arguing about it or extending the Red Line, and then another 40 years building the Red Line extension.

John Fay 12505 kuhl Rd. Wheaton, MD 20902 301-946-5599

As a former County Commissioner in Washington County, Maryland, who remains concerned about the transportation options for our citizens, I urge your Planning Commission to look at the far more expanded implications of increasing MARC service over the extension of a more limited and possibly more expensive solution with the Red Line.

Many employees of metro businesses and agencies travel from Washington County, and other points west, daily into both Baltimore and Washington, clogging highways. These highways cannot continue to be widened as a solution to traffic from a land use and air pollution perspective. The option of MARC service would further reduce carbon emissions and provide your solution with a wider audience from elsewhere in the state.

Each of these proposals are expensive in the near and long term, so you need a greater advocacy for the funds from across the state. Washington County has long been the stepchild when it comes to transportation funding. Interstates 70 and 81 intersect here. Both remain four-lane nightmares.

A 2011 plan for the widening of I-81 has languished for money to complete our 12 miles of this highway, to match what both Pennsylvania and West Virginia have completed. This 10-year delay has cost body counts and funding to our first responders, who deal with this daily.

Both the City of Hagerstown and the Town of Williamsport shut down to local traffic when I-81 is blocked for clean up. US Route 11, the alternate route for hundreds of big rigs passes through both towns. We know what it is to wait beyond a reasonable time for funding.

Linda Irvin-Craig 301-739-1481