



January 26, 2015

Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

RE: State Transportation Priority Letter

Dear County Councilmembers,

The Coalition for Smarter Growth would like to offer comments regarding the county's annual Transportation Priority Letter to the state. As the leading non-profit group advocating for transit and walkable communities in the DC region, our organization counts over 4,000 supporters in Montgomery County. Over the past few years, we have applauded the gradual alignment of the priority list with the county's stated goals for smart growth and transit investment. However, the list still contains several oversized and costly road capacity projects that threaten to undermine those goals. In light of the long term documented trend towards less driving, we urge you to reconsider continuing to prioritize scarce state resources on those projects.

State law governing the priority letter process "requires MDOT and the local jurisdictions seeking project funding to demonstrate the relationship between prioritized projects and the long-term goals of the Maryland Transportation Plan and local land use plans." The goals of the Maryland Transportation Plan focus on safety for all users, system preservation, and environmental conservation.

Restatement of the County's highest transportation priorities: We applaud the high priority placed on the critical transit investments of construction funding for the Purple Line, Metrobus Priority Corridor Network (PCN) implementation, and the 355 and US 29 BRT routes. We don't see in the staff's recommendation the critical need for WMATA's multi-year capital improvements program that will include eight-car trains, and urge you to include that as a top priority in the letter again this year. We also recommend including MARC improvements for the Brunswick Line.

Beyond these highest priorities, we find the priorities for the list of construction, and development and evaluation programs to be a mixed bag of projects. Some will help, and some will hurt, the county's ability to provide better and more sustainable transportation choices for its residents. We applaud the many Bus Rapid Transit line projects that occur throughout the lists, as well as the focus on Bicycle Pedestrian Priority Areas that will complement the smart investments in transit the county plans to make.

We are alarmed, however, by the county's continued commitment to a long list of costly road capacity projects despite growing emphasis on creating a sustainable transportation network that increases the role of transit. The list includes at least 6 grade-separated interchanges, each of which cost well over \$100 million dollars. In most cases, these projects were planned years or decades ago, long before the well-documented downward trend in driving

began. With vehicle miles traveled on the decline in Montgomery County for over 10 years now, we suggest the county do an audit of these costly road projects to see which can be right-sized or eliminated. With very limited state and county funds, we must make wise choices with limited funds to build the right projects to support county and state goals.

The current draft list you are considering today begins to shift this lopsided investment approach, but to complement its sustainable transportation goals, the county needs to leverage state funds to support road projects that enhance the safety and access for all users. As the Council considers the draft list of projects, we ask you to prioritize advancement of transit projects, and increased investment in road and intersection improvements that enhance safety and accessibility for pedestrians and bicyclists.

Below are our suggestions on the draft priority letter that better supports the county's goals of relieving the burden of traffic congestion, making it easier for residents not to drive, and fight climate change.

CONSTRUCTION PROGRAM – as we stated before, we recommend adding and modifying the following:

WMATA Momentum: Funding for 8-car trains, and other capital improvements.

MARC Growth and Investment Plan: MARC ridership is booming, and the Brunswick Line provides a much-needed alternative in the busy I-270 corridor. We urge the County to request funding for the Brunswick Line upgrades for 2020 as outlined in the MARC Growth and Investment Plan, and as recommended by the Planning Board.

Corridor Cities Transitway Stage 2: We urge the county to lower costs for the Corridor Cities Transitway by following the recommendations of the Kittelson report to eliminate to the extent possible tunnels and grade-separated interchanges, which will only create unsafe pedestrian conditions and drive up costs.

ADA best practices for pedestrians along all BRT routes and around rail stations construction funds: As the county builds the Purple Line and Bus Rapid Transit, it should ensure that state roadways have sidewalks and pedestrian infrastructure that meet ADA best practices, as specified in the new Countywide Transit Corridors Functional Master Plan.

Bicycle-Pedestrian Areas Capital Funding Program: Capital funds should be allocated through this program to implement State Bicycle-Pedestrian Areas (BPPA). These areas will enhance pedestrian/bike access to transit and help alleviate traffic congestion, and reduce pollution.

DEVELOPMENT AND EVALUATION PROGRAM

We support the needed funds to complete the planning studies for BRT on 355 and 29, planning funding for BRT on New Hampshire Avenue, and the BPPAs, though we would urge you to more highly prioritize the BPPA funding. We recommend the following additions to the Development and Evaluation Program:

Additional cycletracks to support and connect new bikeshare network. To support the County's new bikeshare network, Montgomery should prioritize funding cycletrack connections between stations.

CONSTRUCTION PROGRAM - Projects to reconsider and defer

Montrose Parkway East: We ask the Council to reconsider the purpose of this project, and its expanding scope and cost. Montrose Parkway East undermines White Flint's walkable future by creating a new, fast moving roadway that will be an unsafe barrier for pedestrians and cyclists. We ask that the county instead seek funds for reconfiguring of the state roads (355 and Old Georgetown Road) needed to create a new street grid for White Flint.

MD 28 (Norbeck Rd.), Georgia Avenue to Layhill Road: widen to 4 lanes, intersection improvements to Georgia Avenue/Norbeck Avenue intersection.

MD 97 (Georgia Avenue)/MD 28 (Norbeck Road): We request that the widening and costly interchange proposal be reevaluated and deferred in light of other more important investments. These projects are part a wasteful half billion dollar proposed investment in road capacity directly parallel to the \$2 billion ICC. With ICC use continuing to fall below original projections, spending money on parallel road capacity will only draw commuters away, cutting needed toll revenue and ensuring that the investment in the ICC will continue to be underutilized. The county should consider SHA's newer plans for a much lower impact, lower cost alternative to improve pedestrian safety and access in the corridor.

US 29/Fairland Road/Musgrove Road and US 29/Tech Road grade-separated interchanges. We urge the Council to defer this and other US 29 interchange projects and pursue US 29 BRT improvements first for a similar cost. Providing high quality transit will help alleviate the burden of traffic congestion and create a more sustainable transportation system into the future. Furthermore, many of the studies calling for US 29 interchanges were completed several years ago and need to be updated with current data and assumptions.

MD 124 (Woodfield Road), Midcounty Highway to Airpark Drive: widen to 4 lanes. The County should consider whether the ICC has made widening unnecessary in this location in order to save capital costs.

DEVELOPMENT AND EVALUATION PROGRAM - projects to reconsider and defer

MD 355 (Rockville Pike)/ Gude Drive grade-separated interchange. We urge the Council to reconsider and defer this project. This is another intersection on one of the highest priority BRT corridors, right by Montgomery College, which will be a major transit trip generator. Building a grade-separated interchange here is incompatible with the County's investments in bikeshare and coming BRT to this area.

MD 119 (Great Seneca Highway)/Sam Eig Highway and Muddy Branch Road: grade-separated interchanges. We ask the Council to defer and re-evaluate this project given that these costly grade-separated interchanges associated with the CCT will only serve to create a more pedestrian unfriendly environment. We ask that the CCT be used to divert traffic to transit trips to alleviate traffic congestion, and avoid interchanges, which are high cost facilities.

Thank you for your consideration.

Sincerely,

Kelly Blynn
Transit Campaign Manager