

July 30, 2009

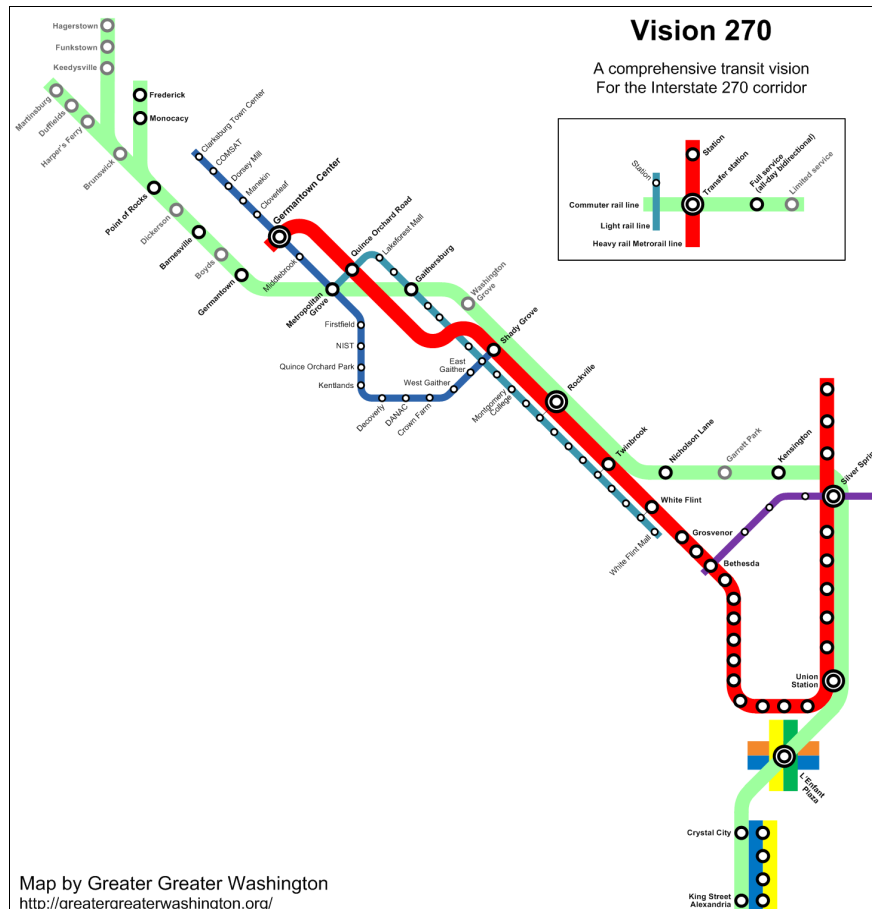
Mr. Russell Anderson, Project Manager
Maryland State Highway Administration
Project Management Division
707 North Calvert Street, Mail Stop C-301
Baltimore, MD 21202

Subject: I-270 Corridor Study, Comment on DEIS

Dear Mr. Anderson:

The Action Committee for Transit urges MDOT to analyze an all-transit alternative in the I-270 Corridor environmental statement. This alternative would provide more and better transportation, do more for economic development, and be better for the environment, compared to the \$3.8 billion highway expansion recommended by the Montgomery County Planning Board. Yet it would cost less money.

Here is a map showing the alternative we recommend for analysis:



This alternative has the following components:

- Red Line to Germantown. A Metrorail extension along the I-370 and I-270 right of way from Shady Grove to an underground station within the Germantown town center. This would be the first major expansion of Montgomery County's transit backbone, and it would be affordable based on the budget in the DEIS.
- MARC expansion. The Maryland Transit Administration developed a plan to expand MARC to an all day, both directions service several years ago, and we along with many residents and commuters are eager to see it implemented. The current MTA plan includes expanded all-day two-way service to Frederick with trains no more than 15 minutes apart in rush hour, at a cost of \$531 million. Our alternative also includes a new MARC line to Hagerstown, using the partially abandoned right of way of the Washington County Branch of the B&O Railroad. Rail service will contribute to the revitalization of Hagerstown as an urban center.
- Route 355 as a multimodal urban boulevard. Master plans from downtown Bethesda to Gaithersburg foresee Route 355 as the main axis of the County's primary urban development corridor. Light rail, where feasible on a dedicated right-of-way in the center of the roadway, is clearly needed along this axis to supplement Metro as far as Gaithersburg. Our plan includes not only light rail, but also rebuilding the roadway as an attractive European-style boulevard, along the lines recommended by the White Flint Partnership, Rockville's plans for its downtown, and Gaithersburg's plan for South Frederick Avenue
- The Corridor Cities Transitway as light rail. We also include an extension to Clarksburg Town Center, fulfilling the promise of a transit-oriented town made to the residents of that community. Making the CCT part of a comprehensive plan, with connections at Germantown and Metropolitan Grove, will greatly enhance its usability and ridership, and increase the chances of winning federal funding for light rail.

A transit scenario much like this, and including the Purple Line, was tested in Montgomery County's Transportation Policy Report of 2001. Traffic modeling showed transit ridership was huge, with the Metro extension alone showing more ridership than the current eastern Red Line outside Silver Spring. The expanded MARC service also showed very high ridership. Transit improvements stimulate a different, more compact growth pattern than do new road lanes, even high-occupancy lanes. The TPR shows the combined benefits of balanced transit-oriented growth and a transit system tailored to serve it.

The TPR transit scenario was not adopted, although the common response was that it was very effective, but too expensive. This was before anyone imagined that widening I-270 would cost so much. Our rough estimate is that the transit scenario, including the incremental costs of building the CCT as light rail, would cost around \$3 billion. This is less expensive

than the road widening alternative recommended by the Planning Board. Further analysis in the DEIS process is needed to refine the cost estimate.

Unlike the monolithic I-270 widening, the transit system would lend itself well to phasing. Each of the components would be useful by itself. The plan could move forward in parallel with other parts of the state, such as the Baltimore Rail Plan and MARC's plans for the Penn and Camden Lines. Projects with extant plans, like MARC improvements, could be built first.

The Obama Administration is seeking to transform national transportation policy, resulting in a level playing field for transit project reviews, and substantially more money for commuter rail and transit. Studying and planning for a comprehensive transit system alternative would position Maryland to win funding for this expanded transit system.

A transit system such as this would further the state's goal of promoting economic development in an environmentally sustainable manner, and it could be phased to fit with transit needs of the rest of the state. It offers advantages that none of the current DEIS alternatives provide for many crucial economic development locations, such as Frederick City, Germantown town center, Lakeforest, Old Town Gaithersburg, and the Rockville Pike Corridor. It also provides support for the revitalization of Hagerstown, an important objective from the standpoints of Smart Growth, economic development, and environmental justice.

We urge you to study this alternative as part of the current Environmental Impact Statement process. In all alternatives now under study, at least 80% of the investment goes to road-building. Including an all-transit alternative in the study is necessary to provide decision-makers with a full-range of choices.

Sincerely,

\signed\

Ben Ross
President