



February 9, 2022

Honorable Gabe Albornoz
Council President
Montgomery County Council
100 Maryland Avenue, 4th Floor
Rockville, MD 20850

RE: Corridor Forward: The I-270 Transit Plan

Dear Council President Albornoz:

The City of Gaithersburg appreciates the opportunity to provide comment on the Corridor Forward I-270 Transit Plan (Plan) going before the County Council for a public hearing on February 15, 2022. Upon review of the document, the City offers the following comments for consideration. The City supports the intent of the Plan to increase beneficial transit options that connect residents to jobs. However, the City does have questions and concerns regarding the Plan. We offer the following related to the Plan's recommendations:

MD 355 BRT:

The City appreciates and fully supports the priority given to the MD 355 BRT line and further supports the County Executive in identifying the portion of this line serving Gaithersburg to be included in construction CIP for FY '23.

Corridor Connectors:

The City's support of the Corridor Cities Transitway (CCT) is well documented. The City has planned and/or approved transit-oriented developments (TOD) such as Crown, Kentlands Commercial District, and the Watkins Mill Town Center leveraging planned CCT stations. The Plan's recommendation to replace the CCT with a collection of infrastructure facilities, Corridor Connectors, raises concerns for the City:

- The CCT was a transit service with the Phase I associated infrastructure fully constructed at one time.
- The Corridor Connectors do not serve many of the City's CCT-based TODs referenced above.

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- The Corridor Connectors are solely infrastructure facilities (dedicated bus lanes) with no associated transit service; has sections in the City that cannot facilitate dedicated bus lanes without property takings; and will have a potentially disjointed, piecemeal implementation creating conflict points with traffic should the lanes be bi-directional (two-way on one side of the road). There are several additional concerns such as how are buses to enter and exit the Connectors while crossing opposite flow traffic? The Plan does not define specifics as to how these lanes are to be configured on roads.
- The CCT transitway (planned bi-directional) and station location future land reservations in the City were granted by property owners to facilitate a branded service, often specifically referencing the CCT for dedication. Roads, such as Decoverly Drive, in the City, were designed and constructed with a 50 foot wide median for the CCT that will go unused and unserved under the current Corridor Connectors plan.
- For the Corridor Connectors to be effective, at a minimum, the Great Seneca and Life Sciences Connectors should be built in a single-phase and not separated. This construction should be in coordination with the full funding of the Great Seneca Transit Network Lime (including extended), Pink, and Cobalt lines.
- The draft MDOT State Transit Plan and the MCDOT Great Seneca Transit Network both identify the CCT as the ultimate planned project goal.

MARC:

The City acknowledges the Plan supports MARC enhancements and expansion, but questions why MARC was not included in the Plan's recommended network. MARC expansion was a cornerstone of the adopted 2013 Countywide Transit Corridors Functional Master Plan. The City questions the arguments made against including MARC in the Plan's network. MARC expansion of the Brunswick Line is the top priority in the draft MDOT State Transit Plan and phased implementation, as was discussed in the State's MARC Cornerstone Plan, should be addressed in the Plan.

Metro Red Line Expansion:

Expansion of the Metro Red Line is the ambitious long-term goal of the Plan. Specific concerns related to this recommendation include:

- The impacts to the City and in particular Olde Towne, are downplayed in the Plan. The majority of property impacts/takings will occur in Equity Emphasis Areas within the City.
- The Plan discusses a specific alignment along the CSX tracks, but acknowledges alternative alignments may be considered should expansion move forward following a feasibility study. The City is of the opinion that the Plan is premature in recommending acquiring 62 feet of right-of-way (ROW) along CSX with no feasibility study completed and alignment determined.

- Much of the justification for Red Line expansion expressed in the Plan is based upon a single service trip, but the goal of the Plan is to provide an interconnected network between services. If this is truly the goal, then the Red Line expansion justification is reduced.
- The Plan states the Red Line expansion does not meet current WMATA standards but does not provide either a discussion in the standards gap (how close or far from meeting standards) or a plan to meet such standards.
- The City does not support creating a new transit station near MD 124 resulting from a Red Line expansion and relocating the Metropolitan Grove MARC Station. Much as with the CCT discussion, the City has proactively created both commercial and residential TODs immediately near the Metropolitan Grove MARC Station. It is anticipated that by early next year there will be almost one million square feet of bio/life science uses in the immediate area. There is currently a new residential plan that includes up to 287 new single-family ownership units immediately across the CSX tracks from the station entering the public hearing process, with more residential forthcoming.
- The proposed relocated station location does not have the extensive and intensive development existing or planned and would only create additional property takings without being able to create the jobs or housing found near Metropolitan Grove.
- Any new multi-service transit hub should be analyzed as part of a Metro expansion feasibility study and the current detailed recommendation removed from the Plan.

Thank you for your consideration of our concerns and recommendations.

Respectfully submitted,



Jud Ashman

Mayor

City of Gaithersburg