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April 30, 2021

Charles Allen, Chair
National Capital Region Transportation Planning Board
Metropolitan Washington Council of Governments
777 North Capitol Street NE, Suite 300
Washington, DC 20002-4239

Dear Chair Allen and Members of the Board

Thank you and the National Capital Region Transportation Planning Board (TPB) for your diligent efforts to update the Region's long-range transportation plan, Visualize 2045. We appreciate the opportunity to provide comments on the projects listed under this plan.

This letter provides the City of Rockville's specific concerns regarding the I-270 and I-495 Traffic Relief Plan P3 – a plan which was to “consider transformative solutions” for users “including improvements to highways and transit.” This plan would convert the existing HOV lanes to HOT and add one (1) managed lane in each direction. Vehicles with three (3) or more people would travel free – a change from the current requirement of two (2) people. Additionally, MDOT's preferred alternative might require the State to provide a subsidy of up to \$482 million to the P3 contractor and \$50 million for predevelopment costs if the project doesn't move forward as planned. According to recent findings, taxpayers may be on the hook for up to \$2 billion to move existing water and sewer lines along I-270. Consequently, we join the entire Montgomery County Council in our support of MDOT's No-Build Alternative (which still provides for multiple highway improvements) and urge you to do the same for the following reasons:

The TPB has been a champion when it comes to air quality and has made much needed progress in this area in recent years. TPB's Vision Goal #5 is to plan and develop a “transportation system that enhances and protects the region's natural environmental quality, cultural and historic resources, and communities.” The proposal for I-270 is tone-deaf to environmental justice concerns and will cause further degradation of our efforts to reach the Washington Metropolitan Region's Council of Governments unanimously approved 2030 Climate Resiliency goals. According to the International Panel of Climate Change, GHG (global greenhouse gas emissions) must be reduced by at least 45% between 2010 and 2030 and reach carbon neutrality by 2050. The proposal is also inadequate in addressing environmental impacts to Rockville's natural resources and related systems, including critically important stormwater management, parks and open space and the Watts Branch, Rock Creek and Cabin John Creek watersheds – all of which are part of the greater Potomac River Basin which itself drains into the Chesapeake Bay

The Draft Environmental Impact Statement (DEIS) was begun prior to the COVID 19 pandemic, which has resulted in radical changes in daily lifestyles, commuting patterns and telework opportunities. The move to approve any portion of this P3 prior to a new DEIS being approved is unthinkable. Rockville and the County question the validity of the outdated Travel Demand Model used to project 2040 travel volumes and patterns. The wide acceptance of teleworking and extensive use of virtual

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meetings suggests that travel models must be revised taking into consideration these changes in order to accurately project future demand.

Goal # 4 of TPB's strategies is to support Regional, State and Federal programs which promote a cost-effective combination of technological improvements and transportation strategies to reduce air pollution, including promoting use of transit options, financial incentives, and voluntary emissions reduction measures. This project clearly lacks the application of any significant transit option.

Similarly, the proposal ignores social justice concerns. TPB's vision goal #1 is for the region's transportation system to provide reasonable access at reasonable cost to everyone in the region. The proposed tolls will be unsustainable for those who have moved outside the Beltway to find more affordable homes. The exorbitant cost of tolls at peak periods, which are expected to be \$2 per mile for a 25-mile stretch during rush hour, and an average of \$0.77 per mile for other times, is simply unaffordable for most regional commuters. This does not support social equity, as required by NEPA, and is totally unacceptable.

The focus on increasing capacity in the southern portion before fixing north I-270 is equally concerning as currently there are only two lanes in each direction between I-370 and Frederick. The daily bottleneck is a result of that choke point, and adding capacity on the northern part of the highway should be the first priority of any future project to address congestion. A 2001 MWCOC study showed that by 1999, traffic counts along the I-270 exceeded those predicted for 2010 and traffic congestion had already returned to unacceptable levels. What's going to be different this time?

There are nine City of Rockville neighborhoods abutting I-270, along with Julius West Middle School, Rockville Nursing Home, First Baptist Church of Rockville, Rockville Christian Church, and the Wee Center, a children's early learning program. Three of our bridges span I-270 and the traffic impacts caused by reconstruction and congestion will be monumental. The plan to convert Wootton Parkway and Gude Drive to toll lane access roads will further impact our residents with additional noise and air pollution, and will be hazardous to those who use our bike/pedestrian paths, which run adjacent to these roads. Wootton Parkway and Gude Drive are already overburdened and are used as alternative routes to Rockville Pike when there are incidents or congestion on I-270.

Further exacerbating congestion on our local roads, the I-270 managed lanes will function as a "highway within a highway," with no interconnections between managed and free lanes. Cars will have to exit the managed lanes onto local roads, and then take local roads to another ramp to get back on the managed lanes. I-270 will also lose one free lane in each direction, likely sending more drivers onto our roads to escape congestion.

In the City's official comments on the DEIS (attached), submitted in November 2020, we laid out our many concerns about the project and the deficiencies in the DEIS. I refer you to those comments and the accompanying list of 23 specific areas of concern. All of those issues as well as the ones described in this letter to you remain current and unaddressed.

Another TPB Vision Goal (# 7), is to achieve an enhanced funding mechanism(s) for regional and local transportation system priorities that cannot be implemented with current and forecasted

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Federal, State, and Local Funding. However, this P3 is a fifty-year financial commitment on a massive scale which offers no benefit to anyone except a private entity whose sole responsibility is to their shareholders. This puts all Maryland taxpayers at great risk. The negative impacts to the City of Rockville and Montgomery County residents, as well as regional commuters, must not be overlooked. By considering alternative approaches, such as the monorail and other environmentally sustainable options, together we can find a solution that is environmentally, socially and economically viable.

We respectfully request your strong support in removing this project from those listed under the Maryland Major Highways in the Visualize 2045 Plan, and we pledge to work together with you to find a more environmental, equitable and sustainable solution to the Region's traffic congestion along the I-270 and 495 corridors

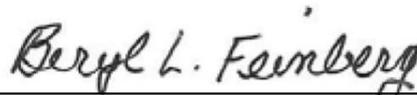
Sincerely,



Bridget Donnell Newton
Mayor



Monique Ashton, Councilmember



Beryl L. Feinberg, Councilmember



David Myles, Councilmember



Mark Pierzchala, Councilmember

And Councilmembers Ashton, Feinberg, Myles and Pierzchala.

cc:

Senator Benjamin Cardin
Senator Christopher Van Hollen
Congressman David Trone
Congressman Jamie Raskin
Congressman Anthony Brown
District 17 Delegation
Montgomery County Council President and Councilmembers
Montgomery County Executive