Gaithersburg
A CHARACTER COUNTS! CITY

August 12, 2013

Mr. Jack Dinne, CENAB-OP-RMN
U.S. Army Corps of Engineers
Baltimore District
P.O. Box 1715
Baltimore, Maryland 21203-1715

Mr. Sean McKewen
Maryland Department of the Environment
Wetlands and Waterways Program
160 South Water Street
Frostburg, Maryland, 21532

Dear Sirs

The City of Gaithersburg would like to take this opportunity to further comment on the Midcounty Corridor Study (MCS) 2013 Draft Environmental Effects Report. The City would like to amend and clarify its position stated in the comment letter dated July 17, 2013 (attached) regarding the various Alternatives Retained for Detailed Study.

While the statements expressed in the July 17 letter's "General Comments" stand, the City recognizes the potential benefits of an additional north-south major arterial roadway paralleling both Interstate I-270 and Maryland (MD) 355 within the defined study area. Regarding the "build" alternatives discussed in the MCS, the City reaffirms its opposition to Alternatives 5 and 8. To make clear, the City has determined Alternative 9 is the least objectionable of the various build alternatives and should be designated as the "Preferred Alternative" with the requests expressed in the July 17 letter; however, based upon the benefits defined in the MCS, the intersection improvements associated with Alternative 2 should be incorporated into any and all of the build alternatives. Thank you for the opportunity to clarify the City of Gaithersburg's position.

Sincerely,

Rob Robinson III, Lead
Long Range Planning
City of Gaithersburg

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July 17, 2013

Mr. Jack Dinne, CENAB-OP-RMN
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P.O. Box 1715
Baltimore, Maryland 21203-1715

Mr. Sean McKewen
Maryland Department of the Environment
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160 South Water Street
Frostburg, Maryland, 21532

Dear Sirs

The City of Gaithersburg would like to take this opportunity to comment on the Midcounty Corridor Study (MCS) released for public hearing. The City has long been involved with this project as a stakeholder and offers the following:

General Comments:

The City acknowledges the need for regional transportation alternatives to serve a growing population in this region. The MCS defines the "Project Need". Prior to comments related to specific Alternatives, the City offers the following related to the "Project Need":

Reduce existing and future congestion.
The document discusses the congestion on I-270 as a detriment to future economic growth; however, no data is provided to show how the various alternatives will impact I-270. While analysis of the alternatives is shown regarding congestion reductions on MD 355, the City would recommend that as part of any final environmental impact study (FEIS) modeling be restudied using current data. Based upon recent traffic counts initiated by the City, it appears that east/west traffic has been reduced significantly since 2011: Much of the data used in the MCS may no longer be accurate or reflect changing dynamics. Further, the study states MWCOG Regional Forecast Round 8.0 was used in the modeling. It is to be noted the current round is 8.2 with 8.3 to begin Fall 2013 and 9.0, Fall 2014. Lastly, the City supports the inclusion of a rapid transit vehicle (RTV) system as proposed in the County Executive's "Transit Task Force Report" and how such a system impacts the need for any expansion of M-83, Midcounty Highway as part of this study. While it is stated that the potential RTV system was not included because it is not funded or in the CLRP, continued references to an unplanned/unfunded possible connection to the ICC are made as a benefit to specific alternatives. This is not consistent.

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Improve vehicular safety.

The City questions the improvement to vehicular safety stated because the majority of conflict points, i.e. curb cuts on MD 355 remain regardless of alternative selected and further, as shown in the study, the City of Gaithersburg accident rates will be relatively unaffected regardless of alternative selected.

Enhance the efficiency of the roadway network and improve the connections between economic centers.

The City has concerns regarding the claimed improvements to the roadway network. Some of the alternatives proposed may divert traffic to City streets not currently impacted. The economic centers discussed include the Life Sciences Center and businesses such as MedImmune-both well outside of the study area. Further, the City questions the proposed benefits of the "ladder configuration" discussed. It does not seem efficient that a driver would exit a congested I-270 to drive past MD 355 to join M-83, especially if the intended destination is anywhere but the Shady Grove Metro area. As to efficiency, the City notes that the travel time savings along MD 355 illustrated in Figure 3-12 at best equates to ±8 minutes northbound (Alternative 8) and ±10 minutes southbound (Alternative 9) during the peak hour; however, this savings is over an approximately 5 mile span and potentially unnoticeable by a driver not traversing the full 5 mile route. The City again questions the overall impacts of the alternatives for such a relatively small savings in drive time.

Accommodate planned land use and future growth.

For the City of Gaithersburg, many of the proposed alternatives conflict with City goals and Master Plan recommendations including not facilitating RTV on Frederick Avenue, losing passive open space, and potentially impacting current and future commercial properties and growth along Frederick Avenue. The study in fact states Alternative 5 would have the greatest potential for long-term indirect effects on businesses through changes in access attributable to the closure of existing entrances and the construction of service roads.

Provide bicycle and pedestrian connections.

The City's adopted 2009 Transportation Element identifies the deficiencies of the MD 355 bicycle/pedestrian facilities. The City believes none of the alternatives proposed address these issues. The bicycle/pedestrian facilities proposed would have little benefit to the City as it relates to MD 355 or connectivity for activity nodes within the City.

Improve the quality of life.

The City has no comments regarding Homeland Security issues. As to improving quality of life, the study presented states this is accomplished through reduced commuting times and offering safer alternatives to congested local roads; however, as shown previously the City questions whether these claims are valid as it relates within our incorporated limits. While the quality of life may improve for Clarksburg and Germantown-at what cost to Gaithersburg?

Comments Related to Alternatives:

Alternative 2:

The City can support Alternative 2, TSM/TDM methods. This alternative is shown in the MCS to alleviate congestion and improve drive times with minimal investment utilizing the existing infrastructure and public rights-of-way, coupled with new express bus service. While this alternative is stated to not substantially improve vehicular traffic safety or mobility; would not provide a new highway or additional lane capacity; and would not provide additional bicycle and pedestrian connections as opposed to other alternatives, the City as discussed has questioned these claims regardless. This alternative would have the least impact to natural resources, parks, and property while still providing relief on MD 355 within the City.

Alternative 5:

The City would like to re-emphasize our opposition to this alternative. The City of Gaithersburg has long expressed its opposition to any alternative that directs traffic onto MD 355, Frederick Avenue. The proposed improvements, such as services roads and MD 355 widening, seem more "theoretical" rather than feasible. The MCS acknowledges such improvements will involve property acquisitions and land use impacts conflicting with zoning approvals previously granted by the City. The City further questions whether there is consensus from State Highway Administration (SHA) regarding these proposed changes. The City would like to review SHA's position on this alternative and Alternative 8. Again as stated, this alternative does not address the inclusion of a RTV system as proposed in the County Executive's "Transit Task Force Report" and currently being studied.

Alternative 8:

This City also opposes this alternative in that it includes the fundamental issues related to the previous alternative discussed, plus the impacts to Blohm Park opposed in Alternative 9. In order for this alternative to work a number of improvements are needed that cannot be made without impacting existing properties located within the City. Further, the City is opposed to adding any M-83 "thru" traffic to the local streets. We continue to express concerns on the true impacts to the adjacent streets such as Russell Avenue and Christopher Avenue as well as the impacts to future redevelopment efforts in this vicinity. The study references M-83 as a northern Great Seneca Highway; however, it is the City's opinion that this type of traffic should not be directed onto the City streets in this area.

Alternative 9:

The City has long documented its concerns regarding the Master Plan Alignment and its impacts to the City's Blohm Park. This alternative would fundamentally change if not effectively destroy the form and function of this park. The passive, scenic park would no longer exist.

Should this alternative be chosen as the preferred alternative, the City would request the following be considered as part of the alternative:

- Relocation of the existing gazebo structure;
- Location of new parking as a result of the loss of on-street spaces;
- An exchange of County owned parkland adjoining the City's corporate limits to replace impacted acreage; and
- Participation in constructing a repurposing of the park as an "active" amenity which could include design/build of a new skate park or similar type use.

In short, the City would prefer Alternative 2, but should it have to choose between the three other alternatives located within the City of Gaithersburg, the Master Plan alignment would be the least objectionable provided the considerations discussed above were made part of Alternative 9. Thank you for the opportunity to comment on the Midcounty Corridor Study.

Sincerely,

Rob Robinson III, Lead
Long Range Planning
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