



**Maryland Department of Transportation**  
The Secretary's Office

**Martin O'Malley**  
Governor

**Anthony G. Brown**  
Lt. Governor

**Beverley K. Swaim-Staley**  
Secretary

September 15, 2009

The Honorable Phil Andrews  
Council President  
Montgomery County Council  
100 Maryland Avenue  
Rockville MD 20850

Dear Mr. Andrews:

Thank you for allowing the State Highway Administration (SHA), the Maryland Transit Administration (MTA), and the Maryland Department of Transportation (MDOT) to provide combined comments on the Gaithersburg West Sector Planning Board Draft Plan. We recognize and appreciate the significant thought and effort that has gone into this work. We offer our comments in the spirit of improving the successful and complete implementation of your plan.

The SHA and the MTA have had the privilege of working on a task force with the Montgomery County Department of Transportation (MCDOT), the Maryland National Capital Park and Planning Commission (M-NCPPC), and the cities of Gaithersburg and Rockville on the transportation elements of the plan. All of the parties have expressed their concerns and provided further insight into the impacts associated with the increased commercial and residential density proposed in the plan. It would be our recommendation that this type of task force be set up for sector plans in the future.

Our broad concerns include the general timing of the approval of this sector plan. The entire sector plan requires some form of the CCT (funding, construction, etc) to be in place. We would like to bring to your attention that neither the determination on the feasibility of the realignment or a selection of the locally preferred alternative or mode have been made. We recommend that the sector plan approval be delayed until these decisions are made. The proper sequencing of plans, one for land use and the other for transportation infrastructure, is especially significant in this sector plan. It would be counter-productive to increase the density in the sector plan area if it was revealed that the realignment is not cost-effective and the transit project could not be realized.

Specifically, the Plan must clearly demonstrate the projected impacts of the proposed infrastructure. This includes projected cost, potential property relocations, impacts to the Corridor Cities Transitway (CCT) alignment and environmental impacts. Excluding the cost of

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widening Key West Avenue to eight lanes (as noted in the plan) and the costs associated with what we believe to be necessary right-of-way, we estimated the price for the interchanges and the realignment of the CCT through the Life Sciences Center to be approximately \$1.3 billion. As you know, priorities for improvements to state roads are vetted through the Montgomery County Executive, County Council and legislative delegation. We look for this and municipal support when we make funding decisions on which projects to advance to planning and design, and ultimately construction. In 2008, Montgomery County's list for projects for addition to SHA's construction program exceeded \$800 million. This list does not include projects such as the I-270/US 15 Multi-Modal Corridor Study, future needed improvements to I-495 and other projects currently in the planning process; the costs of these projects alone could be well over \$7 billion. Given the current economic and fiscal climate, we suggest that a financial feasibility analysis be added as part of this document to fully demonstrate the viability of the proposed development program.

The impact to the CCT also needs to be strongly considered. Along many parts of the original master-planned alignment, right-of-way has been reserved for the CCT. If interchanges are constructed at the Great Seneca Highway/Muddy Branch Road intersection and Sam Eig Highway/Great Seneca Highway intersection, we believe that the CCT will be required to acquire additional right-of-way so the larger intersection footprints can be accommodated. This could result in project schedule delays, additional property takes, and additional costs (which in turn could hurt the cost-effectiveness of the transit project).

We took careful note of the discrepancy between the number of households and the number of jobs in the area. In the scenario of high households and high jobs, this discrepancy becomes over 47,000 more jobs than households. With the M-NCPPC staff recommendations for the medium number of households and the high number of jobs, this discrepancy becomes more severe. As a result of this imbalance, our concern is that employees have little choice than to commute in from areas throughout the Washington region. Toward this end, the SHA conducted a regional analysis to determine the effects of the new trips on the larger regional system. The results indicated that there will be a significant number of new trips along I-270 between north of Muddy Branch Road to MD 28, along Sam Eig Highway and the interchange at I-270 at MD 28. To mitigate these new trips, a new lane in each direction along I-270, an additional lane in each direction on Sam Eig Highway from I-270 to Great Seneca Highway, and ramp modifications to MD 28 at I-270 would be needed on top of current planned highway efforts. Without these improvements, the over 21,000 new daily trips will be forced onto the local road network resulting in severe congestion. We suggest that this impact can be reduced if the gap between households and jobs were more in balance with one another. We would be pleased to go over our analysis with you.

Another concern we have resulting from the regional analysis has to do with the transit mode share. When looking at just the number of transit riders, there is a large increase due to the construction of the CCT and the proposed densities associated with the Gaithersburg West Sector Plan, specifically in the Life Sciences Center areas. However, this number as a percentage of the

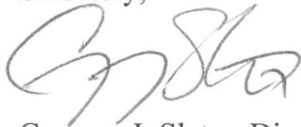
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overall employees and population is much lower than the 30 percent that is automatically assumed in the sector plan. In order to reach this 30 percent goal, increases in transit service, further transportation demand management (TDM) strategies, and a jobs/housing balance will be required.

We would strongly encourage you to consider ensuring that mobility and accessibility needs are adequately addressed during each phase of the development. We believe it is imperative to get the development and transportation infrastructure sequencing properly aligned as the area develops instead of constructing the majority of the major roadway improvements in the last stage. Based on our analysis, we would recommend moving the Sam Eig Highway interchanges to an earlier stage, as this will be the main access route from I-270.

Thank you again for allowing the SHA, MTA and MDOT provide comments on the Gaithersburg West Sector Plan Planning Board Draft Plan. If we may be of further assistance, please do not hesitate to contact us or Eric Beckett, SHA's Assistant Regional Planner at 410-545-5666, toll-free 888-204-4828 or via email at [ebeckett@sha.state.md.us](mailto:ebeckett@sha.state.md.us).

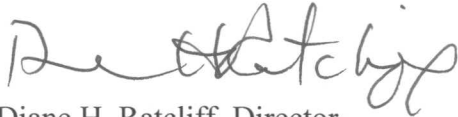
Sincerely,



Gregory I. Slater, Director  
Office of Planning and Preliminary Engineering  
State Highway Administration



Don Halligan, Director  
Planning and Capital Programming  
Maryland Department of Transportation



Diane H. Ratcliff, Director  
Office of Planning  
Maryland Transit Administration

cc: Mr. Eric Beckett, Assistant Regional Planner, SHA  
Mr. Neil Pedersen, Administrator, State Highway Administration  
Ms. Beverley K. Swaim-Staley, Secretary, Maryland Department of Transportation  
Mr. Paul Wiedefeld, Administration, Maryland Transit Administration

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bcc: Mr. Russell Anderson, Project Manager, SHA  
Ms. Mary Deitz, Chief, Regional and Intermodal Planning Division, SHA  
Mr. Rick Kiegel, Project Manager, MTA  
Mr. Darrell Mobley, District Engineer, SHA  
Ms. Heather Murphy, Deputy Director, Office of Planning and Capital Programming,  
MDOT  
Ms. Tina Saxon, Administrative Assistant, SHA  
Mr. Douglas H. Simmons, Deputy Administrator/Chief Engineer for Planning,  
Engineering, Real Estate and Environment, SHA