



# Gaithersburg-Germantown Chamber of Commerce, Inc.

August 25, 2020 - I-495 & I-270 Managed Lanes Study – DEIS Testimony

**I-495 & I-270 Managed Lanes Study  
Draft Environmental Impact Statement (DEIS)  
Federal Highway Administration, Maryland Department of Transportation, Maryland  
State Highway Administration and Maryland Department of the Environment  
Public Hearing – August 25, 2020  
SUPPORT**

Increased capacity of I-270 has been a top priority for businesses in Upper Montgomery County for a very long time. We cannot really address the significant traffic burden without a comprehensive investment in real solutions on I-270. This cannot be done without private investment. The I-495 and I-270 P3 Program is the first real opportunity to address the significant congestion along the I-270 Corridor.

The Gaithersburg-Germantown Chamber of Commerce has been engaged in this project through the years and have reviewed the results of the traffic operational analyses outlined in the Draft Environmental Impact Statement (DEIS) for the I-495 & I-270 Managed Lanes Study. We were not surprised that the No Build Alternative (#1) would not address any of the operational issues experienced under existing conditions and would not be able to accommodate long-term traffic growth. The traffic is untenable now and will only get increasingly worse.

Based on the DEIS, both Alternatives 9 and 10 “consistently perform well in all the operational metrics studied, and each alternative ranked first in three of the six key metrics.” **We reviewed both options and believe Alternative #9 to be the best option for several reasons.** The most important being the use of HOT Managed Lanes vs. ETL Managed Lanes. Having HOT Lanes will continue to provide incentives for carpooling, taking cars off the road further increasing capacity on I-270.

Other important metrics include:

- **Local Network** - While all the Build Alternatives would result in a net reduction in traffic delays on the surrounding arterials, Alternative #9 performs best in terms of improving the local network. Given to burden of traffic on local roads, this is an important metric to consider.
- **Level of Service** - Alternative #9 also performs the best on the Level of Service (LOS) metric. The study indicates that the No Build Alternative would operate at a letter grade of “F” 53% of lane-miles operating during the afternoon peak rush hour (28% “F” during

morning rush hour). While it would be great to project that the new system would never fail, but that would not be cost-effective. Alternative #9 vastly improves the No Build Alternative level of service with a failing grade of only 12% of the operating lanes-miles for both morning and evening peaks.

- **Speed of GP Lanes** - Throughout the project, there has been great concern and debate about toll lanes vs. free lanes. It is important to reiterate that all but one of the alternatives did not take away general purpose lanes. Only one alternative suggested converting a general purpose lane as a contraflow lane during peak periods. It's important that the general public understand that adding toll lanes does not slow down traffic in general purpose lanes. In fact, the average speed increases in the general purpose lanes for all No Build Alternatives. This means that even if an individual commuter chooses NOT to use a toll lane, their individual commute will be faster. Alternative 9 performs best in this metric, increasing average speed in general purpose lanes from 25mph (No Build) to an average of 41 mph.

There are a few more thoughts about the project and the DEIS.

1. We agree that the first priority for I-495 & I-270 is the American Legion Bridge. Fixing that bottle neck is not only an economic imperative, it is a matter of National security. Increasing capacity on the bridge cannot happen without the P3 project.
2. We also want to strongly oppose the MD 200 "short cut". In some circumstances the MD 200 Alternative Diversion may save time for I-95 through trips, but dumping additional cars onto I-270 from 370 to the spur, will negatively impact the travel time for those already traveling on I-270. Encouraging MD200 as a "short-cut" could be disastrous for Montgomery County and Frederick County commuters.
3. We support the option of free bus usage in the managed lanes along I-270 connecting to local bus services, as well as to the Shady Grove Metro station. Now that the Watkins Mill Interchange is open, there is also the opportunity to efficiently connect to the Metropolitan Grove MARC Station via I-270.
4. The section of I-270 between I-370, the spur, and ultimately the American Legion Bridge is in critical need of increased capacity. However, increasing capacity from I-370 north to I-70 in Frederick is equally important. We encourage fast tracking the northern phase of I-270 to create a seamless transition from the American Legion Bridge to Frederick.

Thank you for your time and consideration.

Sincerely,  
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