



Village of North Chevy Chase

These comments are submitted on behalf of the Village of North Chevy Chase, a municipality in Montgomery County, Maryland. We have a strong interest in Managed Lane Study, as our municipality is immediately adjacent to the Connecticut Avenue interchange with I-495. Representatives of the Village Council attended the Public Workshop conducted by MDOT/SHA on July 25, 2018, at the Pyle Middle School in Bethesda, MD, and the comments provided below are based on information provided at that event.

The Village clearly recognizes the many difficulties that traffic congestion on I-495 and I-270 historically and currently pose for residents of the State of Maryland and fully appreciates the desire to consider all possible measures to alleviate these difficulties. At the same time, however, we are concerned that whatever solutions are selected will in fact actually serve to alleviate the problems identified in a reasonable, cost-effective manner. Furthermore, it is important to insure that whatever solutions are selected will neither saddle Maryland residents, including those residing within the Village of North Chevy Chase, with excessive costs nor prove ineffectual in addressing the problems that have been identified. It is from that perspective that the following comments are provided. The Village looks forward to continuing its involvement and participation in this process and consideration of various alternatives moves forward.

Proper Assessment of Environmental Concerns

With regard to the overall approach described at the Pyle Public Workshop, MDOT/SHA identified six screening criteria for evaluating the various alternatives, one of which was specifically delineated as “environmental.” However, the specific elements listed under this screening criteria do not appear in any way to capture or reflect the true environmental impact that any of the proposals under consideration would have. There are four criteria listed, consisting of: (1) would the alternative require additional property; (2) would the alternative impact park properties; (3) would the alternative impact historic properties; and (4) would the alternative impact wetlands and waters. Unfortunately, these four criteria completely ignore the most significant environmental factor that must be considered, which is the extent to which each of proposed alternatives would have an adverse impact on quality of life (including considerations such as noise, light and air pollution) on those individuals residing adjacent to the affected roadways. Indeed, in the summary that MDOT/SHA provided of the initial comments received during the prior round of public workshops conducted in the April/May timeframe, one of the key points highlighted was concerns with effects to the environment, noise, air and property. According to your own data, 22% of the initial comments you received mentioned these environmental concerns (the second highest response rate for the various subjects you listed). Yet your proposed environment screening criteria **completely** ignore these factors. We believe that it is imperative that the environmental screening criteria be revised to fully and appropriately capture these quality of life considerations; a failure to do so would render the entire environmental impact assessment invalid.

Impact of Autonomous Driven Vehicles

It is absolutely essential that the potential impact of autonomous driven vehicles be assessed in the Managed Lanes Study, including how the presence of such vehicles on roadways will affect the intended functioning of any managed lanes. The widespread introduction of autonomous driven vehicles, which is very likely to



Village of North Chevy Chase

occur during the course of the implementation phase of the Managed Lane program under consideration, may in itself serve to significantly reduce the congestion problems that are currently being experienced. Moreover, at a minimum, it is critical to determine what impact, if any, the operation of autonomous driven vehicles would have on the function of and intended benefits to be derived from the introduction of managed lanes along I-495 and I-270, including an assessment of the likelihood that the introduction of autonomous driven vehicles could neutralize if not completely undermine any of the purported benefits of a managed lane approach. From a perspective of fiscal responsibility, the last thing that the State of Maryland needs to be doing is to embrace a technology like managed lanes, at the very time that such a technological approach would become outdated and obsolete.

Considerations Relating to the American Legion Bridge

It looking at the current traffic problems encountered on the Maryland side of I-495, the difficulties certainly begin at the American Legion Bridge. Given that this does not seem to be addressed at all in the Managed Lanes Study, it immediately raises the concern of whether any proposed solution that does not include the American Legion Bridge could have any meaningful effect on traffic congestion, and at best would represent nothing more than a band aid response to the serious traffic congestion problem that currently exists.

Design Considerations Affecting All Managed Lane Proposals

It is important to note that, while certain of the alternatives deal separately with I-495 and I-270, the predominant thrust of the Managed Lane Study appears to view both roadways as raising similar issues. That, however, is not the case at all, either in terms of the current day-to-day usage being made of the two roadways or the impact that the introduction of additional lanes would have on each roadway. For example, there is likely limited benefit for accommodation of a rapid bus transit (RBT) solution on I-495 because of its configuration and the areas that it provides access to. However, recognizing that the I-270 corridor is being billed as a high-tech corridor with significant employment opportunities, increased availability of affordable public access transportation could offer significant public benefits that would warrant more serious consideration on I-270 of the addition of RBT lanes.

Design criteria for managed lanes may also differ significantly between I-495 and I-270. Given that local access lanes already exist along I-270, the ability to access managed lanes from every interchange point along I-270 may be relatively easy to implement. However, in the case of I-495, that may be much harder to achieve from a design perspective, potentially resulting in the replication of the situation currently in place on the Virginia side of I-495, where the introduction of managed lanes involves very limited options for ingress and egress to the managed lane system. On the other hand, presumably the design decisions utilized in determining the managed lane configuration on the Virginia side were largely driven by cost considerations and those same considerations may very well carry over to the design choices made on the Maryland side as well. However, a failure to have access to managed lanes at each interchange point on the Maryland side of I-495 would likely diminish the ultimate value of the implementation of a managed lane approach, particularly given that substantial traffic volume I-495 on the Maryland side involves relatively short duration trips along that roadway. In short, what may be an appropriate solution for I-270 may be



Village of North Chevy Chase

completely inappropriate for I-495 and vice-versa. The Managed Lane Study fails to full take this into account.

Indeed, looking more broadly at the experience to date with various managed lane approaches in the region, it is questionable at best whether any of these approaches can be characterized as producing anywhere near the beneficial results that were promised. These shortcomings should in themselves serve to raise some significant red flags as to the desirability of introduction of additional managed lanes at this time. In his regard, let the current examples speak for themselves:

- **I-66 in Virginia inside the Beltway**, where the implementation of a managed lane approach has resulted only in the imposition of absurdly high toll charges on vehicles utilizing that roadway during rush hour period.
- **I-495 on the Virginia side of the Beltway**, where design choices have severely limited the utility of managed lanes that have greatly limited their utility, given the limited number of entrances and exits where the managed lanes can be accessed. Add to this is the horrendous re-entry difficulties encountered by vehicles using the managed lanes into the main stream of traffic during periods of congestion, particularly in the case of east-bound I-495 traffic reintegrating with regular lanes shortly before coming to the American Legion Bridge.
- **Intercounty Connector in Maryland**, where the implementation of a managed lane approach has only resulted in a massively underutilized roadway that at best can be called a fiscal nightmare.
- **I-95 north of Baltimore**, where there are again serious design flaws or limitations in the implementation of managed lanes that have greatly limited their utility, the principal one being that the I-695 interchange is not accessible from the I-95 managed lanes, rendering the utility of that as a significant traffic reducer virtually non-existent.

Conclusion

We believe that the Managed Lane Study as currently designed is seriously flawed in a number of key respects. A failure to address the concerns identified above and to modify the Managed Lanes Study to appropriately take those concerns into consideration can only result in decisions that are unlikely to resolve the underlying problems they are intended to address and that will impose significant costs and disruptions on the citizenry of the State of Maryland.

Submitted by Village of North Chevy Chase Council
August 27, 2018