

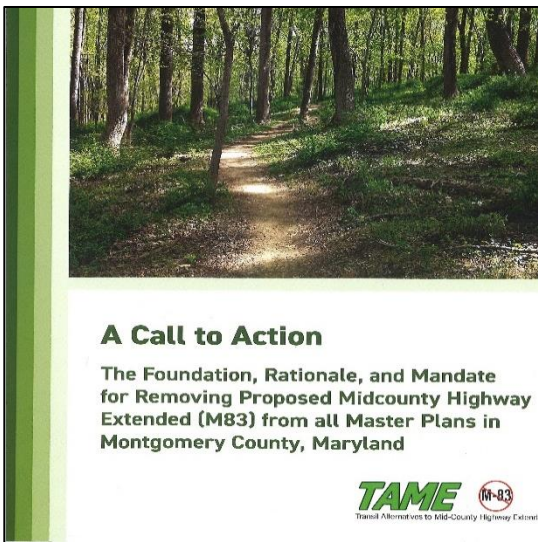


Transit Alternatives to Mid-County Highway Extended

August 26, 2024

Dear Planning Board Chair Artie Harris, Vice-Chair Mitra Pedoeem, and Commissioners Hedrick, Bartley, and Linden:

The Coalition for Transit Alternatives to Midcounty Highway Extended (TAME Coalition) submits the following letter and attachments¹, including the [Call to Action](#), as formal commentary into the public record for the Master Plan of Highways and Transitways 2024 Technical Update.



The Call to Action publication contains an assemblage of fundamental issues, justifiable reasons, and actions for removing M83 highway from Master Plans.

- 1) Recent Government Actions to Cancel Proposed M83 Highway and Remove it from Master Plans
- 2) Definitive Findings in Support of Cancelling Proposed M83 Highway and Removing it from Master Plans
- 3) Avoid Community Harm and Promote Social Justice
- 4) Protect and Maintain Parkland, Forests, Biodiversity, and the Agricultural Reserve
- 5) Adopt Transportation Alternatives and Smart Growth Solutions
- 6) Choose Climate Sanity
- 7) Final Actions Required to Remove M83 Highway from all Master Plans

All revisions and updates to county master plans are technical in nature, involving thorough reviews, detailed analyses, and specific policy recommendations and actions regarding the myriad issues addressed in such plans. Five (5) categories of technical changes are included in the draft Master Plan of Highways and Transitways (MPOHT), including, 1) Removal of Streets; 2) Changes to Street Classification, Target Speeds, and Planned Lanes; 3) Addition or Removal of Transitways; 4) Addition or Removal of Transit Stations; 5) Creation of Growth Corridor Street Types.

¹We respectfully request that this letter, the attached six (6) letters, and the TAME Coalition’s report, “*Call to Action. The Foundation, Rationale, and Mandate for Removing Proposed Midcounty Highway Extended (M83) from all Master Plan in Montgomery County, Maryland,*” be included in the official public record for the Planning Board’s public review period and public hearing. The six (6) letters found at: <http://tamecoalition.org/m83-opposition/> were sent to the County Council from transit, environmental, and civic organizations that describe the harms M83 would cause, and that demand action be taken to permanently cancel and remove the entirety of the proposed M83 highway from the MPOHT.

The MPOHT 2024 Technical Update must not foreclose other specific transportation elements from consideration.

1. The entirety of the Midcounty Highway Extended (M83) is one such technical component that TAME Coalition and its partners are requesting the Planning Board to remove from the MPOHT.
2. The 2024 MPOHT update is the appropriate instrument for removing M83 highway.
3. Nearly 20% of all public comments received by the county on the 2024 MPOHT update were with regard to M83 highway, and all of these comments stated that M83 needs to be removed from the MPOHT. <https://montgomeryplanningboard.org/agenda-item/june-27-2024/> (item No. 12).
4. No comments were received requesting M83 highway be retained.
 - a. This reflects the overwhelming public agreement that final and permanent removal of M83 highway from the MPOHT and all county master plans is in the public interest.
 - b. Numerous environmental and civic organizations also demand that the Planning Board and County Council take action to permanently cancel and remove the entirety of the proposed M83 highway from the MPOHT.

Significant, high-level actions have already been taken that invalidate the M83 highway.

1. County Council Resolution No. 18-957, *Transportation Solutions for Northwest Montgomery County*, nullified and stripped reliance on M83 highway in all future master plans, and for addressing future roadway capacity needs and regional traffic movement.

https://apps.montgomerycountymd.gov/ccllms/DownloadFilePage?FileName=8710_1_4855_Resolution_18-957_Adopted_20171031.pdf

Resolution No.: 18-957
Introduced: September 19, 2017
Adopted: October 31, 2017

**COUNTY COUNCIL
FOR MONTGOMERY COUNTY, MARYLAND**

Lead Sponsor: Council Vice President Riemer
Co-Sponsors: Council President Berliner and Councilmembers Elrich, Navarro, and Leventhal

SUBJECT: Transportation Solutions for Northwest Montgomery County

Background

1. Mobility for Upcounty residents is limited due to congestion and a lack of public transportation alternatives to I-270, MD 355, and other roads serving Clarksburg, Germantown, Montgomery Village, Gaithersburg and surrounding areas.
2. Four major infrastructure projects serving this area are envisioned in county master plans, including expanded capacity on I-270, the Corridor Cities Transitway, Bus Rapid Transit on or near MD 355, and the extension of Midcounty Highway (M-83) north of Montgomery Village Avenue.
3. For many years, there has been no clear consensus to extend Midcounty Highway to the north, yet master plans have assumed the availability of such an extension to put these plans in balance between land use and transportation.
4. Montgomery County is committed to protecting our environment and doing our part to stem the carbon emissions that are driving global climate change, as demonstrated in the following actions:
 - a. Resolution 18-846, adopted on June 20, 2017, reaffirmed the Council's commitment to meet the goals of the Paris Climate Agreement.
 - b. The Montgomery County Department of Transportation has adopted a Sustainability Policy that commits that the County will "Plan and implement a transportation system that broadly considers ecosystem and climate impacts, reduces and prevents waste and pollution, uses renewable resources, uses sustainable sources of energy and reduces energy consumption."
 - c. The Countywide Transit Corridors Functional Master Plan, approved by the Council in 2013, states that "Expanding transit infrastructure through more efficient use of public rights-of-way is essential if current and future congestion is

Page 2

Resolution No.: 18-957

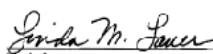
to be mitigated. In addition to reducing Countywide travel time for drivers, an expanded transit network is necessary to support the County's land use, environmental, and economic development goals and make transit a reliable alternative to driving in the County's developed core."

Action

The County Council for Montgomery County, Maryland approves the following resolution:

1. The Council supports expanded capacity on I-270, the Corridor Cities Transitway, Bus Rapid Transit on or near MD 355, and improvements on MD 355. These improvements will provide significant, immediate relief for Upcounty residents. These improvements align with our economic development strategies, providing the broadest and most diverse benefits, and minimize impervious surface, stormwater runoff, carbon emissions, and other environmental impacts.
2. The Council directs the Montgomery County Planning Board not to assume additional road capacity from the northern extension of Midcounty Highway when calculating the land use - transportation balance in future master plans, including but not limited to the upcoming Gaithersburg East Master Plan and the Germantown Plan for Town Sector Zone. This step ensures that any new development allowed under these plans does not rely on the northern extension of Midcounty Highway, while retaining the right-of-way for this extension in these plans.

This is a correct copy of Council action.


Linda M. Lauer, Clerk of the Council

2. The Transportation Planning Board of the Metropolitan Washington Council of Governments (MWCOG/TPB) removed M83 highway from its *Visualize 2045: A Long Range Transportation Plan for the National Capital Region*, including the FY 2023—2026 Transportation Improvement Plan and its Air Quality Conformance Analysis.

2022 Update to VISUALIZE 2045 AIR QUALITY CONFORMITY NETWORK INPUTS (highway)												6/23/2021
	PIT Project ID	Con ID	Project ID	Improvement	Facility	From	To	Facility		Lanes		Completion Date
								Fr	To	Fr	To	
240				Widen	Little Seneca Parkway	MD355	Observation Drive	3	3	2	4	2035
241	CE1245	172	MC11A	Construct	M-83 MidCounty Highway-Extended	MD-27 Ridge Road	Middlebrook Road	0	2	0	4-6	2025-2045
242	CE1245	204	MC11D	Construct	M-83 MidCounty Highway-Extended	Middlebrook Road	Montgomery Village Avenue	0	2	0	4-6	2025-2045
243		113	MC12F	Widen	MD 118 Germantown Road Extended	MD 355	M 83 at Watkins Mill Road	2	2	3	4	2020
244	CE1229	161	MC14G	Widen	Middlebrook Road Ext.	MD 355	M 83	2	2	3	4	2025-2045
245	3703	214	MC15B	Construct	Montrose Parkway East	Eastern Limit of MD 355/Montrose Interchange	Veirs Mill Road/Parkland Road Intersection	0	2	0	4	2022-2045

https://www.mwcog.org/events/2021/?F_committee=196 Resolution R19-2021. Chart is page 28 of 58.
Yellow cells below denote changes to Montgomery County roadways from previous long-range plan.

3. The MWCOG/TPB's draft of *Visualize 2050* also removed the M83 highway as shown on the Air Quality Conformity Input Table. <https://visualize2050.org/>
The MWCOG/TPB's federally-mandated transportation planning process for the Washington Metropolitan Region concluded that excessive air quality violations would result if proposed M83 was constructed.

VISUALIZE 2050 AIR QUALITY CONFORMITY NETWORK INPUTS
COG/Transportation Planning Board removed M83 Highway

	PIT Project ID	Con ID	Project ID	Agency ID	Improvement	Facility	From	To	Fr	To	Lanes From	Lanes To	Completion Date
247	CE1577	199	MC43		Construct	Dorsey Mill Road Bridge over I-270	Century Blvd.	Milestone Center Dr--Observation Dr.	0	3	0	4	2030 2040
248	T3049	112	MC7A		Widen	Goshen Road South	South of Girard Street	1000 feet north of Warfield Road	3	3	2	4	2030 2040
249	T7503	11221			Widen	Little Seneca Parkway	MD355	Observation Drive	3	3	2	4	2035
250		113	MC12F		Widen	MD-118 Germantown Road Extended	MD 355	M-83 at Watkins Mill Road	2	2	3	4	2020
251	CE1229	161	MC14G		Widen	Middlebrook Road Ext.	MD-355	M-83	2	2	3	4	2045
252	3703	214	MC15B		Construct	Montrose Parkway East	Eastern Limit of MD-355/Montrose-interchange	Veirs Mill Road/Parkland Road Intersection	0	2	0	4	2045
253	T7503	11220			Construct	Extend Observation Drive	Waters Discovery Lane	West Old Baltimore Road	0	3	0	4	2035
254	T7503	11222			Construct	Extend Observation Drive	Little Seneca Parkway	Existing Observation Drive near Stringtown Road	0	3	0	2	2045
255	CE1236	119	MC34		Widen	Snouffer School Road	MD 124 Woodfield Road	Centerway Road	3	3	2	4	2021 completed

4. Montgomery County Department of Transportation's *Midcounty Corridor Study Supplemental Report*, dated February 10, 2017, concludes that MD 355 Bus Rapid Transit, along with intersection improvements and other enhancements to existing transportation systems are superior to building M83 highway, based on multiple transportation performance metrics.

SCENARIO 1: MCDOT Supplemental Report Overview		14		
	No build	Scenario 1: BRT & Intersection Projects (Alt 2 & 5)	Scenario 2: BRT & 2-lane on M-83 for Alt 9A	Scenario 3: (No BRT) 4-lane on M-83 for Alt 9A
1. Lowest VMT (vehicle miles traveled)	118	115	143	149
2. Highest percentage of people in transit vehicles	9.9%	22%	18.8%	8.6%
3. Shortest travel AM and PM peak hour travel time on MD 355	3.3	2.3	3.1	3.3
4. Fewest number of intersection delays at AM & PM peak hrs	8	5	8	6
	7	3	15	5

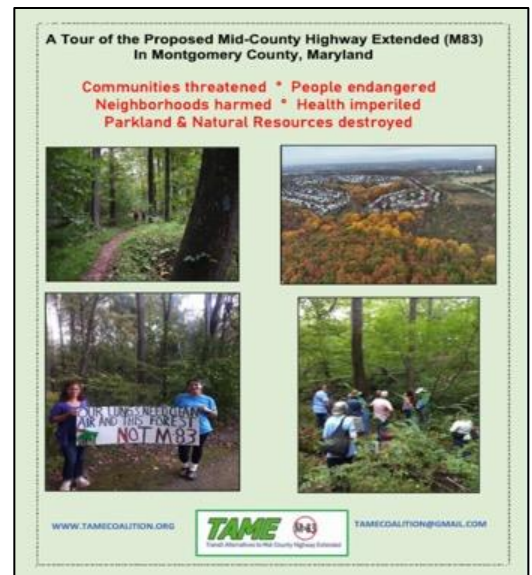
Table "MD 355 Vehicle-Miles Traveled and Person-Throughput" released later to support "MCS Suppl. Rept. Feb 10, 2017" shows that either person throughputs for No-Build and Scenario 3 are too high or those for Scenarios 1 and 2 are too low. Either old estimates with different assumptions were brought forward from previous studies of No-Build and Scenario 3 or BRT was not correctly analyzed. Other incompatibilities of No-Build and Scenario 3 vs Scenarios 1 and 2 are also noticeable.

Best Transportation Improvements for Midcounty Corridor Area, 2018 TAME Coalition report. www.tamecoalition.org

Thousands of people and hundreds of properties abut the alignment of the proposed M83 highway. Thousands more depend on the forestlands threatened by M83. The proposed alignment bisects and fragments:

- Five (5) public parks:
 1. Great Seneca Stream Valley Park
 2. North Germantown Greenway Stream Valley Park
 3. Wildcat Branch Stream Valley Park
 4. Seneca Crossing Local Park
 5. Blohm Park
- Montgomery Parks' Seneca Creek Greenway Trail
- Three (3) Montgomery Village Community Open Space Parcels:
 1. South Valley Park
 2. Seneca Spring Way Wetlands
 3. Stedwick Community Green Space

The TAME Coalition's Tour Booklet documents M83's grave impacts to neighborhoods, natural resources, and public parkland.



<http://tamecoalition.org/>

Proposed M83 highway is a fossil fuel project. Its retention in the MPOHT:

- Contradicts environmental and transit policies
- Subverts sound land use planning
- Debases your trusted role to protect healthy communities and quality of life
- Weakens your stewardship of our public recreational lands and parkland

Your decision regarding M83 highway is an environmental protection and social justice decision.

We request that the Planning Board now remove proposed M83 highway from the Master Plan of Highways and Transitways.

Sincerely,

TAME Coalition

Margaret Schoap Diane Cameron Tim Goodfellow Deborah Sarabia

TAME



Transit Alternatives to Mid-County Highway Extended

tamecoalition@gmail.com

www.tamecoalition.org

x.com/tamecoalition

facebook.com/tamecoalition