

May 7, 2013

Ms. Francoise Carrier
Chairperson
Montgomery County Planning Department
8787 Georgia Avenue
Silver Spring, MD, 20910

Re: **City of Rockville Comments on the Draft Countywide Transit Corridors
Functional Master Plan (CTCFMP)**

Dear Ms. Carrier:

Thank you for the opportunity to comment on the Countywide Transit Corridors Functional Master Plan (CTCFMP). We, as well as our Planning Commission and staff, have reviewed the Plan and have received very informative presentations from your staff. These presentations have helped us gain a better understanding of the draft plan, given the fairly short time frame granted to thoroughly review the document and submit comments for the record. Our comments are therefore the result of discussions between staff, the City's Planning Commission and ourselves.

General Comments:

The City supports the concept of increased public transportation options in the County and region. We recognize that the plan's central purpose is to identify the optimum routes for a future system and also identify the rights of way that will be necessary to support them. However, we have observations, questions and concerns based on our understanding of the draft plan.

1. The MD 355 routes would have significant redundancy with the Metro Red Line. Although there appears to be sufficient traffic to justify this, we are concerned that any new line must add value for Rockville residents and businesses as well as for through traffic. More stops along the MD 355 North and South routes are recommended. We would welcome more detailed planning on the question of how the line can serve Rockville residents, as well as those for whom Rockville is a destination.
2. We are concerned about the potential impact on current local bus service along the corridors contemplated for Bus Rapid Transit (BRT) service in the future. Many City

- of Rockville residents rely heavily on the existing system for access to locations that would not be served by the BRT system. It is very important that such service levels be retained for these critical routes and other local bus services be enhanced. A better and broader network may also enhance BRT (and Metro) ridership through a more robust multi-modal spread.
3. Have transit options other than BRT been considered? We question whether buses with infrequent station stops would meet the expectations and travel demand of City of Rockville residents who need to make intra-city trips. Has Light Rail been considered for the routes with less frequent stops? Have streetcars been considered for the routes where more frequent stops are indicated, such as MD 355 North and South?
 4. Has consideration been given to how the system might be financed? It appears there should be strong consideration given to who the system will benefit and who will contribute toward its implementation and operations. We recognize that it is too early to make definitive decisions on financing and consideration of other modes, but our citizens are asking these questions.
 5. We appreciate the initial preliminary process that went into the County's planned placement of stops along all the corridors. However, we feel this should be coordinated very closely with the City, given our land use plans and authority over development projects that will ultimately generate ridership demand for the system. We are particularly concerned that the placement of stations be adjusted to track more closely with current and planned areas of high pedestrian activity. This would allow effective use of the transit corridors by pedestrians and bicyclists, which could be further enhanced by placement of bike-share stations in coordination with the transit corridor stations.
 6. We have concerns about the impact on the Rockville Metro Station with the convergence of three significant BRT routes within that very congested and constrained space. Finding solutions will require close coordination between multiple parties, including the City, to identify an appropriate arrangement without negatively impacting the adjoining neighborhoods; and may call for flexibility in routes and treatments.
 7. We are opposed to the general concept of lane repurposing, but acknowledge that there are numerous technical issues to be resolved. It will be imperative that the City work closely with the Montgomery County Department of Transportation (MCDOT), and the Maryland Department of Transportation (MDOT), to determine the lane treatments for Rockville.

Route-Specific Comments:Corridor 3: MD 355 North

8. This route, with its potential to enhance transit service to Montgomery College and pull users to central Rockville, is valuable to the City. However, we question the ability to physically accommodate the additional necessary right of way to implement the level of BRT treatment recommended on this route. Unlike the segment on MD 355 South, where we are completing an update to the Rockville Pike Plan, we have not had an opportunity to explore this portion of the corridor in any detail. We have directed City staff to evaluate potential cross sections for MD 355 North. We will examine options including the value of lane repurposing; adequate right of way, vehicular movements, sidewalks, bicycle lanes, landscaping, etc. It is likely this preliminary analysis will be concluded in time for the City to submit comments in the fall to the Montgomery County Council.

Corridor 4: MD 355 South

9. In large part, the space to accommodate a two-way median BRT in the median already exists for this route. The City's 1989 Rockville Pike plan and the cross-sections in the draft update to the plan, which is currently in progress, provide more than 240 feet between building faces for much of the length of the MD 355 South corridor within the City. The cross-sections in the draft plan preserve three travel lanes in each direction *plus* the two-way dedicated transit lanes. However, we acknowledge that there are significant issues in the northern portion of the route, between Rockville Metro Station and Richard Montgomery Drive. A variety of lane treatments will need to be considered to determine the most feasible alternative for Rockville.
10. We strongly believe, due to the cross-section we are planning for the portion of MD 355 South within the City, combined with the land use plan, that additional stops should be programmed along this corridor. We are particularly concerned that sections of the route would be underserved by the stations recommended in the CTCFMP, which are too few and too far apart to serve Rockville's needs. A system that provided more stations (or stops) would work better for Rockville.
11. Provided that a transit system that would work for Rockville can be devised, we would support the MD 355 South route being built out as a final configuration as soon as feasible, with no halt, or change of treatment, at the City-County boundary.

Corridor 10: Veirs Mill Road

12. We support additional transit options on this critical route but understand that it is a very complex and difficult undertaking, from both a land use and an engineering perspective. Veirs Mill Road within the City is especially challenging as it bisects residential neighborhoods. We understand a technical working group has been

evaluating this segment under the direction of the State Highway Administration and we believe it is best to let the current working group continue its more detailed study. The City will offer additional recommendations once the working group has completed its work and has provided further guidance as to the feasibility of this option. At that point, it will be most important to work together closely, and to include significant public input, as we all consider the various alignment and treatment options explored and recommended by this working group. This route, as a new transit option and under-served transportation direction, is valuable to the City.

Next Steps

13. Finally, one overarching concern is that, moving forward, there should be close coordination between M-NCPPC, the cities of Rockville and Gaithersburg, Montgomery County DOT, Maryland DOT and WMATA to develop a recommendation that meets the needs of all stakeholders. Any future system will need to work for City of Rockville citizens, not just for those passing through the City on their way to White Flint, Wheaton, down County, D.C., or the future Great Seneca Science Center. Furthermore, we understand that an inter-agency implementation team has been formed, but that the cities have not been invited to participate. Cities must be involved at every step, as implementation will depend on our participation. We recommend this committee be expanded to include the City of Rockville.

Thank you for the opportunity to provide comments on the draft plan.

Yours truly,

cc: