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Hello Rick,

You have asked me to provide you a list of the flaws I have discovered in the Alternative Analysis Report for Commercial Property Owners published April 2014 and the Alternative Analysis Report for the Mission Hills community published May 2014. Please see my findings below.

Flaw 1: Selections are Arbitrary: In both reports, the determination of the preferred Options appear arbitrary and not based on any defined criteria and/or weighting. In some cases, the preferred option was selected based on cost, other options based on environmental impact and still other selections were based on the change in commute times. While all are important and I understand tradeoffs are required, clearly defined and consistent criteria are needed.

Flaw 2: No Accountability: Both reports are silent on the person or people who are selecting the preferred options. The report refers to the CCT Project Team, MTA, MTA Project Team, and the SHA. There is no consistency or transparency relative to the decision making process or participants.

Flaw 3: Scope of Impact: Both reports disregard the impact to the 800 homes of Washingtonian Woods. Along the Phase I 9 mile CCT proposed alignment, the most negatively impacted residents would be those living in the Washingtonian Woods community. With respect to other established neighborhoods, such as the Kentlands, the CCT passes through the existing commercial areas.

Flaw 4: Safety: Both reports are negligent by excluding accepted safety criteria in the evaluation of the options. In one example, the consequences of the addition of 2 lights at each of the Midsummer Drive entrances, resulting in 4 lights within about 0.5 miles, would result in a doubling of expected crashes based on information provided by the US Department of Transportation, Federal Highway Administration, with the Benefits of Access Management brochure per the table below. The brochure can be found at the following URL:
<http://www.safety.fhwa.dot.gov/geometric/pubs/accessmgmtbrochure/access.htm>

Increasing the distance between signals also reduces the incidence of crashes. A review of crash data from seven states demonstrated that the crash rate increased substantially with additional signals per mile. [4] This is partly related to access spacing, which is presented next.

Signals Per Mile	Crashes Per Million VMT
Under 2	3.53
2-4	6.89
4-6	7.49
6+	9.11

Flaw 5: Disclosure: The Mission Hills report, Section II Mission Hills Alternatives, Paragraph A Study Area on page 4, references the Great Seneca Science Corridor (GSSC) Master Plan specifications for widening Muddy Branch Road to six through travel lanes between Darnestown Road (MD28) and West Diamond Avenue (MD 117). The report notes again in Section III. Summary/Conclusions under Option 1 on page 25, that the future widening (of Muddy Branch Road) would not be accommodated. As this change is not aligned with the GSSC Master Plan, the study should have disclosed these facts, acknowledged the conflict and outlined the actions required to address this conflict

Flaw 4: Surreptitiousness Additions: The Mission Hills report, Section II Mission Hills Alternatives, Paragraph C. Option 1: Median of Muddy Branch Road on page 11, without explanation or purpose, changed Belward North from a transitway only to a proposed new right-in, right-out access with Muddy Branch Road. This is in conflict with the GSSC Master Plan and not considered in any other report to date, including the Alternative Analysis Report for Commercial property Owners Coalition. While this proposal would increase traffic significantly, the study did not provide any details on the impact on the traffic, impact of residences of either Washingtonian Woods or Mission Hills, and safety issues.

Flaw 5: Misrepresentation: Edgar Gonzalez, Deputy Director for Transportation Policy for MCDOT representing the Montgomery County Department of Transportation, repeatedly raised technical opposition to both studies which the CCT Team has to date disregarded. In his email to yourself and Diane Ratcliff, dated Monday May 19, 2014 9:39 AM, he noted that your findings should be noted as preliminary in nature. The reports, the CCT website, and your own dialogue discussing the alignment with the residents of Washingtonian Woods continues to portray the alignment down the median of Muddy Branch as the selected alignment.

Flaw 6: Conflict with the Montgomery County Department of Transportation: The above mentioned, email from Edgar Gonzalez, raised multiple points of technical opposition, including shifting major problems and costs from MTA to the County, adding an entrance to Belward Farm from Muddy Branch road without consideration of the additional traffic, and not considering the impact these changes would have on the residents in Washingtonian Woods. On August 5, 2014, Mr. Arthur Holmes, Jr. Director of the Montgomery County Department of Transportation wrote to Mr. Henry Kay, Executive Director for Transit Development and Delivery, Maryland Transit Administration, reiterating the May 2014 concerns and requested MTA to respond. As of Monday, August 18, no response has been received.

Based on the flaws found above and other considerations, we request the following actions:

1. Clearly define the selection process and criteria used in weighing the different options.
2. Clearly define the decision making process along with who is responsible and accountable.
 - a. with respect to determining which options are preferred or not preferred.
 - b. how a preferred option becomes a recommendation.
 - c. how a recommendation becomes a final decision or solution.

3. Re-open or perform a new study including the traffic and safety impact on Washingtonian Woods residences considering the LPA route, Option 1 Median of Muddy Branch Road, and Options 2, 3 and 4 which bypass Muddy Branch Road and continues down Great Seneca Highway. Study should also take into consideration the existing GSSC Master Plan to widen Muddy Branch Road to six lanes.
4. Provide explanation and supporting documentation with respect to the history of the proposed Belward North right right-in, right-out access onto Muddy Branch Road.
5. Publicly disclose, by posting on the CCT Website, the 'preferred Option 1 Median of Muddy Branch Road is not compliant with the GSSC Master Plan and requires approval by the appropriate local government officials'. In addition, please provide any upcoming dates on when proposals to local government officials will be made.
6. Publicly respond to the Montgomery Country Department of Transportation for each of the points raised by both Mr. Gonzalez and Mr. Holmes.