

## Item 12 - Correspondence

**From:** [M.Schoenbaum](#)  
**To:** [MCP-Chair](#)  
**Subject:** Comments on draft Complete Streets Design Guide  
**Date:** Tuesday, July 21, 2020 11:23:47 AM

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

Dear Planning Board Commissioners,

1. The design guide should be based on a design PERSON, not a design vehicle. And the design person should be a 4th-grader walking to/from school without an adult. If the road is safe for the design person, then it's safe. If the road is not safe for the design person, then it's not safe, and it needs to be changed so that it is safe.
2. Current levels of non-motorist activity should not be a factor in road classification. Current levels of non-motorist activity are the result of current road design. Current road design should not be used to justify the perpetuation of non-motorist-hostile road design in the future.
3. Just as we currently build roads for peak motorist activity (though we shouldn't), we should build sidewalks and bike lanes for peak pedestrian/bicycle activity. For example, sidewalks and crosswalks next to schools should be big enough to accommodate all users without delay at arrival and dismissal.
4. Shared-use sidepaths should not be the default bicycle/pedestrian facility. They are bad for both pedestrians and bicyclists. The default should be to separate the modes: sidewalks for pedestrians, buffered or protected bike lanes for bicyclists.
5. However, sidewalks must be designed to be safe for people who feel more comfortable biking on sidewalks, with special attention to curb radii at driveways.
6. The maximum target speed for all roads in Montgomery County must be 35 mph or less (except 270, the Beltway, and the ICC). That includes county roads classified as "major highways," such as Father Hurley Boulevard, Randolph Road, and Shady Grove Road. All of these are roads that people walk, bike, and take the bus on.
7. Channelized right turn lanes (slip lanes) and right-in-right-out driveways with islands must be prohibited.
8. Multi-lane roundabouts must be prohibited.
9. Use of the 85th percentile speed "rule" to set speed limits must be prohibited
10. The control vehicle should not be a 47' fire truck (Fire & Rescue should buy smaller equipment), and the design vehicle should not be a 30' truck. Both are too big. No more building wider/faster roads so that Fire & Rescue can more easily

access the severe/fatal crashes caused by the wider/faster roads.

11. The default corner radius must be 10', not 15'.

12. In constrained ROW, the default must be to reduce lane width/number of lanes to reallocate road space away from cars and to pedestrians, bicyclists, and trees.

13. Motor-vehicle parking on the shoulder must be prohibited on roads with "bikeable shoulders," because shoulders with motor vehicles parked in them are not bikeable.

14. The primary consideration in road diets must be safety, not current or projected future motor-vehicle traffic volume.

15. All legs of signalized intersections must have marked/signalized crosswalks with pedestrian signal heads, unless pedestrians are prohibited from the roadway, or if there is physically no pedestrian access on either corner and no likelihood that access can be provided.

16. The maximum number of motor-vehicle through lanes for roads classified as Downtown Boulevard, Town Center Boulevard, and Boulevard must be 4, not 6, because motor-vehicle through lanes create barriers to safe movement for people walking, biking, or taking transit.

17. All pedestrian signals must either have passive/automatic pedestrian-activity sensors or be on pedestrian recall.

18. Traffic sensors at signals must be programmed to include bicycle detection.

19. Both sides of bridges must have equally good pedestrian/bicycle facilities.

20. Every road built in Montgomery County since at least 1980 is overbuilt. Too many lanes, lanes too wide, speeds too high. Everything in the road code that contributes to this overbuilding must be removed.

Thank you for considering my comments,

Miriam Schoenbaum  
15004 Clopper Rd  
Boyd MD 20841

**From:** [Gilbert Chlewicki](#)  
**To:** [MCP-Chair](#)  
**Subject:** Testimony for Montgomery County Complete Streets Documents  
**Date:** Tuesday, July 21, 2020 5:55:41 PM

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

My name is Gil Chlewicki, PE. I am a transportation planner/engineer. I am the Director of Advanced Transportation Solutions. I am the chair of the Intersection Subcommittee of the Transportation Research Board (TRB).

While this topic is part of my professional expertise, I am writing as a County resident and as a Director, Board Member, and Transportation Committee Chair of the Kemp Mill Civic Association, near Wheaton.

I am very happy that the County is so focused on pedestrian, bicycle, and transit issues. I am a big advocate for better pedestrian and bicycle design to improve safety and operations for these users. This document is a great start. That being said, I do have concerns with the content.

#### Bigger Picture Items

While there needs to be more focus on pedestrian and bicycle issues, there are too many places in this document where the consequences to motorists are being ignored. A complete street includes all modes of transportation.

As shown on Figure 1-2 on page 9, there are about 4X as many serious and fatal crashes of motorists than non-motorists in the county. While we must work on getting pedestrian and bicycle fatalities towards zero deaths, we cannot ignore how some design effects to improve pedestrian and bicycle safety may increase motorist deaths if not thought through carefully.

Similarly, there are nearly 4X as many severe and fatal crashes occurring on our arterials compared to minor streets, which are generally in our suburban and rural areas. This document does not do a great job of addressing the significantly different issues in the suburban and rural environments, which I will get to later in these comments.

And while safety needs to remain a high priority, we must not forget the main purposes of streets as stated in Section 1.2. Streets are the economic lifeblood of our County. But the various contexts of streets affect our economy very differently. In urban destinations, the economic activity is on the street level. Vehicle mobility is not a high priority in these locations. But along the arterials and highways that connect people and good to destinations, mobility is extremely important for a vibrant economy. We must find safe solutions for all users in these contexts without losing the importance of mobility. In short, we can apply urban solutions everywhere.

#### Specific Items

Section 2.2 - Street types should identify in the key features (a) vehicle activity and (b) the possible land-use contexts. Preferably, land-use contexts should match closely with the latest

AASHTO Green Book that classifies five contexts: urban, urban center, suburban, rural, and rural town. All street types should identify where pedestrian, bicycle, transit, and motor vehicles are located. It is not acceptable for exhibits in a complete street document to not feature any of these modes. For example, in Neighborhood Yield Streets, there is county bus service on some of these streets (i.e. Inwood.Ave near Wheaton).

Section 3.2 - General note 1 states correctly that "AASHTO allows for flexibility". Yet in much of this document there are fairly rigid minimums and maximums, along with a lot of items that are not recommended. Yes, the figures that follow are supposed to be just a starting point for discussion. But then the next section states that in some cases, these values are going to be required. Flexibility needs to be a two-way street.

Figure 3.2 - Lots of issues with values that often don't take into account context and/or research.

- Target Speed - It is appropriate and desirable to have higher target speeds in suburban and rural environments. Treatments for pedestrians and bicycles must be thought of differently in these contexts that account for higher speeds. Speed is not the main cause of pedestrian and bicycle fatalities. The lack of access and well-designed crossing opportunities is the primary reason.
- Max # of Vehicle Thru Lanes - Context may create different answers here.
- Max Spacing for Protected Crossing - 400' max spacing between crossings can create significant safety issues for vehicular traffic and is generally unrealistic from a funding standpoint. Spacing should be based on context and need. Max spacing value is unadvisable.
- Max Spacing between signals - Again will be context based. Values are mostly unrealistic.
- Left Turn Lane - Dimensions under 11' can have significant safety issues for motorists and should often be used only as a last resort in constrained areas.
- TWLTL - Do not understand how this affects pedestrians and bicycles since crossings generally do not go over TWLTLs. Generally wider TWLTLs increase safety for motorists.
- Inside Travel Lane - A 10' max width is highly inappropriate when speeds are greater than 25 mph and creates significant safety concerns for motorists.
- Parking lanes along streets with speeds greater than 25 mph creates significant safety and operational issues. Preferable if no on-street parking is allowed on these streets. Otherwise, may consider 12'-14' parking lanes. Keep in mind that every on-street parking space is a conflict point and injury crashes are going to increase when speeds are greater than 25 mph.
- Street Buffers - Not always feasible and/or needed depending on the context.
- Pedestrian Clear Zone - Consider renaming to Walkway. Clear Zone has a safety connotation and is confusing to most planners and engineers.

Section 4.6 - Sign Sight Distance is missing a very important element. Placement of signs near pedestrian crossings can often lead to pedestrian sight distance issues with turning vehicles. This happens a lot more often than one might think. We have this issue in Kemp Mill.

Section 4.7 - BRT Stations - Don't "date" the document by stating the 1st BRT is under construction. For most readers, this will be in the past by the time they read it. (Not a very constructive comment; force of habit reviewing documents.)

Section 4.8 - Open Section Roadways needs more input. Pedestrians and bicycles are common on many of these streets and used as a shared roadway. Transit is also common along open section roadways, especially school buses (which is never mentioned in the document other than a design vehicle for right turns). Another example on how suburban and rural issues are being ignored even though more severe and fatal crashes are occurring in these contexts.

Chapter 5 - This entire section is focused only on urban contexts. Complete streets need to be implemented in all contexts and arguably is most needed in the suburban context (particularly as it relates to Vision Zero), without trying to change the context to an urban one.

Section 5.3 - Curbside zone needs to include transit stops. Ride Hailing Loading/Unloading Zones can be an issue on neighborhood and rural roadways where there is nowhere to pull off and can block bike lanes.

Section 5.4 - The most common lane width is not 10 feet and should only be used in slow speed/urban environments. Otherwise it creates significant safety issues for motorists as shown in the Highway Safety Manual (HSM) and other research. Suburban and rural lanes need to be a minimum 11' in most cases and often should be 12' when speeds exceed 40 mph.

There is no text at all related to shoulders. Shoulders are a very important safety element for all users in rural (and some suburban) environments. Shoulder widths should be determined based on context and the HSM.

It is not always true that TWLTLs increase crash risk. Again it depends on the context. For example, a road diet that converts a 4-lane roadway to a 2-lane roadway with a TWLTL and bike lanes is a significant safety improvement all around. TWLTLs may also be preferable in corridors where there is not enough room to have a raised median and left turn lane.

Section 5.5 - There are no examples currently of rural roadways with wide medians in the county, but there could be in the future such as along MD 97, MD 355, or MD 28. Wide medians are often preferable in these contexts for safety reasons on high speed roadways.

Chapter 6 - Again, the focus here is too much on urban environments and not enough on suburban and rural contexts.

Section 6.1 - Intersection safety is much more complex than making an intersection as compact as possible. If not done properly, compact intersections can increase crashes for all users.

Sections 6.3 - 6.5 - Complete support for the write-up here in an urban context. But this will not be true in many suburban contexts and can be particularly problematic in rural contexts. Trucks are not the only concern. Farm equipment, vehicles with trailers, and RVs will have issues with tight radii at intersections.

Section 6.6 - Recessing the stop bar increases the intersection dimension for motorists. This is both an operational and safety issue for motorists. Operationally, it requires an increase in the yellow clearance time (along with not allowing RTORs). Safety-wise there is a greater chance a vehicle will not clear the intersection before the next phase, creating dangerous angle crashes. So context again becomes very important here. Recessing the stop bar can work in urban environments better than suburban or rural contexts.

Section 6.7 - Channelized Right Turn Lanes are not always bad for pedestrians and can be an important safety element for motorists and cyclists when designed properly. There is mixed data on channelized right turn lanes when it comes to pedestrians in general, especially in the suburban and rural contexts.. And there are now "smart" channelized right turn lanes that control the speed and flow of drivers much better. There should not be any specific discouragements of these elements in general as there needs to be flexibility for all users and it is possible that this can be designed to be advantageous for pedestrians too. Instead, just focus on how to design them properly.

Section 6.8 - Roundabouts should never be discouraged or require engineering judgment. Roundabouts are a clear measure of virtually eliminating all severe and fatal crashes for all users. The fastest way to accomplish Vision Zero is to convert all intersections to roundabouts. (I don't think there has been a single pedestrian death at a roundabout in the US!) There are of course other considerations to whether an intersection should be a roundabout. Roundabouts should minimally be recommended for neighborhood connectors, neighborhood streets, and town center streets.

Section 6.9 - For design considerations, skewed intersections are often a great reason to install a roundabout and often it does not require any significant realignment. The Design Considerations section should simply ask readers to refer to the latest roundabout guidance. Note that the 3rd edition of the NCHRP (spelling in text) roundabout guide should be coming out sometime next year.

Multi-lane roundabouts can be very effective in areas with high levels of bicycle and pedestrian activity. Two MD examples are the multi-lane roundabouts in Maple Lawn, just across the county border up US 29, and the Towson roundabout in Baltimore County. In an urban low-speed environment, multi-lane roundabouts can be great for pedestrians and cyclists. They can become more problematic in higher speed suburban and rural contexts. Please remove the anti-recommendation of multi-lane roundabouts as once again, it depends on contexts.

This section should also introduce the option of other innovative intersections. Montgomery County has jughandles (US 29/Fairland and Blackburn roads), Median U-Turn Intersections (US 29/MD 193), Quadrant Roadway Intersections (MD 586/Randolph Road) and elements of a Continuous Flow Intersection (Randolph Road/Parklawn Drive). These innovative intersections can have significant safety and operational advantages for all users when designed properly.

Section 6.10 - The County's preferred standard for curb ramps is considered a Best Practice for ADA when it comes to low-vision pedestrians and wheelchair alignments.

Section 6.11 - Protected Intersections are great in urban environments. It gets more complicated though in suburban and rural contexts. They should not be the default treatment for all contexts.

Two-stage Turn Queue Boxes should include an option where RTOR would still be permissible. Again, context matters. In suburban environments, RTOR can be a necessary design feature.

Bike Boxes can be problematic in suburban and rural contexts to vehicle safety and

operations.

Bike Crossings at Freeway Ramps do not necessarily require grade separation if the ramp can be designed at a slow speed at the crossing. Elements of this are at ICC/MD 97 (which I designed). Unsignalized treatments are possible and shouldn't be anti-recommended, especially if the context does not require controlled treatments.

For Traffic Signals and Bicycles, change to the minimum yellow and red clearance interval.

Chapter 7 - An element of a "Green Street" that gets left out is the ability to minimize vehicular stops, which creates emissions and affects air quality.

Chapter 9 - This chapter might be the most problematic of the document. There needs to be a balance between safety and operations and that balance changes based on the context. There also needs to be an understanding of how much safety is improved for each user including people in vehicles. And speeds need to match the context, not the other way around, since we have seen in a lot of research that drivers will base their speed on context much more than a posted speed. There is definitely evidence of that on roads in the County that have reduced their posted speeds over the past decade-plus.

Section 9.2 - All the information here is good until getting to target speed. Target speed needs to be based on the context of the road, not the street type. There also needs to be a recognition that there is a major difference between "streets", "roads", and "highways". "Streets" are generally urban and/or slow-speed contexts. "Highways", whether a minor 2-lane highway of a major interstate are high speed contexts that are extremely important to our economy and environment. "Roads" (or "boulevards", "connectors" are going to be somewhere in between based again on context. When there are attempts to change context based on target speed, it always fails. Therefore, these target speeds must be increased outside of urban and residential streets.

Section 9.3 - Speed management needs to prioritize the context of the street and surroundings. There are ways to provide safe, comfortable, and reasonable access for non-motorized users in higher speed situations.

Road diets -

- Center turn lanes can be effective when there are two or more thru lanes in each direction based on the context and shouldn't be a blanket anti-recommendation.
- Elimination of turn lanes outside of slow-speed urban contexts can significantly increase vehicular crashes.

Lane Diets - The reference to narrower lanes reducing crash rates is very misleading. That document references another study, which when read carefully does not show that lane diets actually reduce crashes. All other studies, including those in the Highway Safety Manual, show that lane reductions increase crashes, with double digit percentage increases once a lane is narrowed below 11 ft on roadways with posted speeds above 25 mph.

Roadway Curvature - Applying AASHTO Green Book for Low-Speed Urban Streets on contexts other than urban streets is very dangerous. There is a very specific reason that the Green Book is recommending for an urban context only. It has only been proven through

research to be safe in that context.

What is being recommended for suburban contexts is essential to convert the roadway to an urban roadway that is out of context. This violates the Green Book and will end up hurting safety, operations, air quality, and the economy.

Enforcement - Complete streets are not self-enforcing streets. The objective of complete streets is simply to provide the proper operations and safety for all users for the roadway.

Section 9.4 - Applying urban solutions to suburban contexts will hurt safety for all users, particularly in Example A. Horizontal curves significantly increase the risk of crashes for vehicles and cyclists. Crosswalks near horizontal curves only increase the risk of crashes, especially when providing landscaping that further reduces sight distance. These examples should only apply to an already urban or town center environment.

### Conclusions

There is a lot of great material here involving complete streets, especially in the urban context. If this was renamed Montgomery County Urban Complete Streets with the deletion of suburban and rural references, this document would be close to perfect.

My main objections to the document is trying to apply these urban solutions to suburban and rural contexts throughout the County. It will end up hurting safety for all users as well as having adverse effects on our economy, air quality, and quality of life. There are better complete street solutions for suburban and urban contexts. Please don't turn the County into one big city. And please don't provide solutions that will make our roads less safe.

I would be happy to discuss further either by e-mail, web call, or phone (301.395.9971).

Gil Chlewicki PE



**From:** [Scott Plumer](#)  
**To:** [MCP-Chair](#)  
**Subject:** July 23 - Item 12 - Complete Streets Design Guide - Public Hearing - Darnestown Civic Association Written Testimony  
**Date:** Wednesday, July 22, 2020 10:24:23 AM  
**Attachments:** [image001.png](#)  
[DCA CSDG TESTIMONY 200723 FINAL.pdf](#)

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

Thank you for allowing us to testify. We plan to verbally present an abbreviated version of the attached written testimony on Thursday July 23, 2020.

Sincerely,

**Scott Plumer**

Staff Assistant for Research and Special Projects  
Darnestown Civic Association Executive Board and Committees  
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**Darnestown Civic Association**

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## DCA CSDG TESTIMONY 200723

Hello everyone. For the record my name is Scott Plumer. I am representing Vision Zero Darnestown, a project of the Darnestown Civic Association's Roads Task Force (DCA RTF). We are dedicated to eliminate vehicle involved death and severe injury while increasing safe, healthy, equitable mobility for all.

We wish to thank Chair Anderson, Vice Chair Fani-Gonzalez, and the rest of the board for allowing us to testify today. We also wish to thank Director Wright and the entire Montgomery Planning staff for their exceptional work which we enjoy every day as we live our lives in Montgomery County. Additionally, we would like to thank Montgomery County Department of Transportation Director Conklin and staff for their dedication in helping create a direct joint collaborative work product produced by Montgomery Planning and the Executive Branch. Bringing synchronized, consensus built solutions before the County Council will result in a better future. We are hopeful District 3 of the Maryland Department of Transportation's State Highway Administration will fully participate and support these efforts.

Longer term we hope to see all government entities, including MCPS doing more direct joint collaborative work products building on the current more distant method of coordination, inter-agency technical task forces, boards, committees, and commissions.

The challenge we face as a complete community is to corral disparate government entities, overcome their differing definitions of our place, and advocate for our community based cohesive vision. We still expect timely implementation and operational excellence even while clearly faced with a myriad of planning cycles and competition for scarce resources.

## Overall Impressions

We understand the Complete Streets Design Guide (CSDG) is about the roads we want not the roads we have. Even so, as planners we know when a definition of a desired state is accepted and compared to the current state there is an implicit statement about what is needed now. Certain variances call for near term corrective action, especially in a Vision Zero environment. One is not zero. Perhaps, an apropos leadership quote is “the difference between vision and hallucination is execution”. Near term corrective actions pave the way for long term excellence. Deference to inaction on picking up the metaphorical banana peels littering our roads needs to end.

We believe the built environment can cause people to choose safer behaviors. We also believe continuous messaging and education is required to reinforce safer behaviors. Egregious behaviors must be met with powerful corrective measures.

Safer roads need to be a higher priority than throughput. Engineering and public policy measures related to capacity must be tempered with risk assessment.

Our focus is on Country Connectors, Country Roads and neighborhood street types. A vast majority of roads in our community do not have shoulders, curbs, or sidewalks.

We are honored to have three of our streets pictured in the Guide.

There is an addendum in our written testimony providing a bit of background on the DCA RTF.

We offer the following specific changes and observations to the current draft CSDG.

### 1. Country Roads and Country Connectors

It seems very few if any current Country Connectors are four lanes, yet the illustration shows four lanes with a wide right-of-way. A massive buildout is not feasible nor widely desired and we suggest a modified illustration with two lanes and Bikeable Shoulders be shown along with a modified discussion. Two lanes is a more achievable design.

Streetlights are an out of place element shown in the illustration. Per the specification on page 36 for Country Roads, streetlights would only be at intersections and pedestrian crossings. Country Connectors would likely have even less lighting. The illustration should drop the Street Lights.

We are confident in suggesting Seneca Road (112) should take Esworthy Road's place as a Country Road in the CSDG. Seneca Road is too tight with limited sight lines, too short at three miles, and loaded with approximately 45 driveways, a day camp, and is a recreational bicycle route with no shoulders making it unsuitable as a good example of a Country Connector but an excellent example of a Country Road. A lane width reduction, slower speed limit, and Bikeable Shoulders may make it safer, yet it would still be best considered as a County Road.

We think of Esworthy Road as a Neighborhood Street. The intersection of Seneca Road (112) and Esworthy at the state context driven level is currently a demarcation point between Suburban Zone D and Rural. We plan to advocate for some fine tuning of those boundaries as we learn more.

River Road seems like a wonderful Country Connector illustrative example and demonstration project. River Road has the right of way and heavy recreational bicycle traffic. Beyond the Seneca Road (112) junction River Road has enormous potential as it is a county road, goes through a wildlife management area and a historic district, has Poole's Store as a home base, and has Riley's Lock / Seneca Landing Park.

The changes we suggest above are consistent with the Bicycle Master Plan.

All three Country Connector examples in the CSDG are state roads and points to the importance of close collaboration with all levels of MDOT to continuously improve our roads.

“Figure 3-3. Priorities in constrained rights of way” for Country Roads and Country Connectors does not reflect our experience or understanding of the risk profile of these road types. We suggest revisiting the grid.

## 2. Speed Gradients and Design Changes along a single road

Numerous roads throughout the county see their character and associated Street Type change as the road traverses radically different land uses and other contextual changes. The criteria for a Street Type change is not yet detailed enough and the speed gradient changes are left open to broad interpretation.

Figure 2.1 shows how Georgia Avenue undergoes multiple street type changes along its path.

The examples at the end of Chapter 9 discuss the challenges of a road whose street type changes along the road’s route. We would like to see much more specificity around criteria for stepping down speeds including contextual changes such as bicycle usage, driveways, institutions, capacity for delivery vehicle stops, transit stops, and susceptibility to corridor overflow. These criteria have broad applicability and are more informed than a primary dependency on density and land use changes. These contextual criteria can apply for all situations requiring speed gradients and other calming measures. A few grids around Street Type transition criteria and priorities would be useful.

There is mention of keeping the federal classification system of Arterials, Collectors, and Local Streets as an overlay. A grid showing how the proposed street types map into the federal overlay would be useful. There is mention of arterials throughout the CSDG but they are not defined. We find it alarming to have arterials mentioned as a corridor. Perhaps a new street type or overlay of Corridor is emerging. Corridors without containment create bloat and overflow.

Section 9.4 talks about Retrofit but only in the context of arterials. We believe retrofitting requires greatly expanded coverage in the CSDG. Much of the work to achieve the proposed designs will be retrofit work.

Section 9.4 also touches on one of our highest priority items: corridor overflow. The problem for us is people bail out from lower throughput roads and overrun roads designed for lower capacities and single mode use. Lower speeds and flow control devices like roundabouts are some of the very few defenses we have against increased risk due to overflow volumes.

### 3. Roundabouts

Roundabouts can offer lifecycle cost efficiencies particularly if accident reduction is considered. They are an effective speed management measure and we believe they should be included in “Figure 9-3: Appropriate speed management measures by street type”. We believe roundabouts have broad applicability on Country Roads and Country Connectors.

### 4. Maintenance

Once we realize implemented designs we wonder whether maintenance upkeep will be programmed and verified or will require “pulling teeth” just to do simple “blocking and tackling” like upkeep of lane markings. We suggest street design is complete when it includes a build specification, an implementation path to materialize the design, and a maintenance regime to keep it complete. We believe maintenance deserves to have its own section in the Implementation chapter and be more than a few paragraphs in section “10.3 Project Development Process”.

Maintenance specifications need to address countywide monitoring, reporting, and all upkeep aspects in a greatly improved version of the already exceptional Traffic Engineering & Operations streetlight and traffic signal issues reporting systems. Maintenance issues reporting and resolution systems need to add capability for handling Traffic Signs and Markings. A maintenance item grid by

street type designed to prioritize the never-ending maintenance needs would be useful for setting, sharing and meeting expectations.

## 5. Rustic Roads

Given there is a Rustic Roads Master Plan update in process it is vital to have direct collaborative work between the Rustic Roads team and the CSDG team. The two teams need to work together to exchange and synchronize their evolving designs and descriptions.

Rustic Roads often initiate and / or terminate on Country Connectors and Country Roads. In some cases the speeds are currently one hundred percent apart. These intersections have special design guideline considerations requiring input from both teams.

We have around eleven rustic roads in Darnestown and they are precious. A member of the DCA RTF is a former Chair and Engineer of the RRAC.

We are challenged with safe bicycle usage on rustic roads and CSDG precepts need to be applied to rustic roads by the rustic roads team in consultation with the CSDG team. Pedestrians, bicycles, and vehicles all share the rustic roads in our community. The special character of rustic roads requires an interpretive implementation of behavioral cues for users.

We have recreational access issues along our rustic roads. We have dangerous and quite often illegal shoulder parking, overcrowding, and other issues related to overcapacity usage. Our watershed features and extensive trail network need more well controlled access and our rustic roads need to be safe for all users, with deference to resident's right to quiet enjoyment.

## 6. Corridor Failure

Design aspects of corridor overflow prevention are recognized but not dealt with in the CSDG. Mitigation during incidents is not a primary design performance metric covered in any of the P3 or managed lanes engineering documents we have reviewed nor are they top of mind for the engineers we have met. The capability in road design and implementation to minimize the effects of an incident without inducing overflow is not properly incented.

Causing volumes to frequently inundate primary and secondary roads providing service to neighborhoods is not good design. Unintended road use obviates design, greatly reduces safer behavior and propagates incidents.

## 7. Speedy is Greedy

20 is plenty ..... for neighborhoods

35 to survive and thrive ..... everywhere else (except highways)

Thank you for your time. We are committed to work with you to continuously improve our roads.



## Addendum

The DCA RTF spent two hours discussing the CSDG with Stephen and Andrew and are excited to be a small part of a herculean effort.

We have inventoried approximately 118 streets and divided them into 28 neighborhoods. We have approximately 11 rustic roads. Three of our roads are highlighted in the CSDG.

We have four state roads within Darnestown: MD-190, MD-112, MD-28, and MD-118. Three of those state roads terminate in Darnestown, each terminating at an intersection with another state road. Our village is at the termination of MD-112 on MD-28. Just outside of Darnestown on the eastern and western edges, four additional state roads, MD-107 and MD-117 to the west, and MD-124 and MD-119 to the east, all terminate on MD-28.

We are only sixteen square miles with approximately 6500 people. Within our community, we have two major watersheds and their confluence with the Potomac River, an adjoining very large historic district, local parks, a state park and a national park, and we border the Ag Reserve. The DCA is currently working to expand our community place description and look forward to sharing what we think is an exceptional collection of attributes.

Our intent is to “map” our current issues inventory for every street in our community to the new standards and begin to prioritize and advocate for changes including making Vision Zero changes. We also intend to help each neighborhood specifically detail what each street looks like in a fully implemented future.

Parking is an example of the many road issues we are cataloging in our small community. Recreational access issues and occasional heavy shoulder parking exists on our rustic roads and on 118 at Seneca Creek, 28 at Seneca Creek and on 28 at our local Park when sporting events are taking place. Proper protections for shoulder parking are not in place at any of these locations.

**From:** [Luecking, Betsy](#)  
**To:** [MCP-Chair](#)  
**Cc:** [County Executive IQ](#); [Council President](#); [Crowel, Raymond L.](#); [Brunetto, Odile](#); [Seth Morgan \(cpwdchair@gmail.com\)](#); [Patricia Gallalee](#)  
**Subject:** Complete Streets Design Testimony for July 23, 2020  
**Date:** Wednesday, July 22, 2020 10:31:50 AM  
**Attachments:** [Outlook-1508437486.png](#)  
[CPWDcompletestreetsdesignplantestimonyV2 \(2\).docx.docx](#)

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

Dear Mr. Anderson,

Dr Seth Morgan, Chair, Commission on People with Disabilities has asked me to forward to you testimony regarding the Complete Streets Design Draft. Patricia Gallalee, Vice-chair will be testifying on behalf of the Commission tomorrow. Please let me know if you need any additional information from the Commission. Thank you.

Warm Regards,

Betsy Tolbert Luecking, Community Outreach Manager  
Commission on Veterans Affairs - Commission on People with Disabilities | Montgomery County Department of Health and Human Services,

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Commission on People with Disabilities  
Testimony before the Montgomery County Planning Board  
Complete Streets Design Draft  
July 23, 2020

Seth Morgan, MD – Chair  
Patricia Gallalee – Vice-Chair

The most important priority of the Commission on People with Disabilities in regard to transportation is to ensure pedestrian safety for everyone, including children/students, people with disabilities, older adults and the general public. Currently, the County has numerous transportation plans and projects which affect pedestrian safety, including:

- Bicycle Master Plan
- Safe Streets to Schools
- Pedestrian Master plan
- Vision Zero
- Visually Impaired Urban Navigation Study and Pilot Design
- Complete Streets Design Draft

There are probably many others which we're not aware of. This fragmented approach is not only confusing for the public, but also leads to haphazard design that puts people of all ages and abilities at risk. For example, specific school safety issues have been left out of the Complete Streets Design Plan. We are asking the County to align the plans to have a consistent and comprehensive approach to pedestrian safety. This will result in effective transportation planning with the goal of-preventing serious or fatal accidents resulting in making the County a safer community.

On page 8 of the document, there are six common principles from Montgomery County's Vision Zero Action Plan. We believe this plan fails to comply with all except for the first one that states: "Transportation-related deaths and severe injuries are unacceptable." The remaining 5 principles are not achievable with this existing draft.

Below are several serious safety issues with the Complete Streets draft we would like to bring to your attention:

1. Bus stops should be located on the sidewalk curb, not a floating bus stop, so the location is predictable and consistent with the most common design standards nationally and internationally. The design of the floating bus stops poses a severe safety risk to peoples who are blind, have low vision, or who have a mobility limitation. We strongly recommend that a moratorium be placed on the installation of floating bus stops and that the existing ones be removed based on the concerns raised by numerous individuals who are blind and advocacy and support organizations

2. The Commission is not averse to making bike riding safer. The US Census American Community Survey indicates that 1.1% of the population commutes to work. The County should consider locating bike paths on roads that do not have bus routes or consider putting bike lanes in the middle of the road. This would maintain the use of sidewalks by pedestrians of all stages of life who need them to participate and be included in community life.
3. Continuous sidewalks should exist on main arteries to schools. As you know, this past year there were accidents regarding grade school and high school students, and it is noted that school safety issues are not specifically addressed in the document. On page 207 of the Montgomery County Complete Streets draft, there are no safety speed targets for school zones while schools are in session. The document does not specifically address having consistent school safety standards.–We recommend that school safety be incorporated as part of Vision Zero planning.
4. For passengers of taxis, paratransit/MetroAccess and other vehicles there needs to be **safe pick-up and drop-off zones**. Page 101 of the draft guide mentions them in the context of rideshare vehicles and taxis, but many drivers need to safely drop-off passengers at the curb, especially passengers who have difficulty walking. Also, MetroAccess drivers leave their vehicle, place a traffic cone at the traffic side of the vehicle, and guide riders who are blind and who need assistance finding the door to the building, which may take 5-10 minutes.
5. The current design does not address accessible street parking. The current reduction in road width makes it difficult if not impossible for the average person to safely get out of their car without being hit by an oncoming vehicle. It is impossible for drivers who exit their car on the driver side with their wheelchair and a service animal. We request that DOT revisit the policy given the fact that the 2011 Proposed Guidelines do include designs for accessible street parking.

It appears that transportation funding may be diminishing due to COVID-19. Bus routes have been cut to 40% and rail to 30%. We encourage you to use precious funds to ensure that people have adequate access to public transportation and that sidewalks are installed and maintained as needed. We recommend that the County slow down and carefully evaluate transportation projects that do not have direct, immediate and significant safety value for residents of all ages and abilities.

It is the responsibility of this Commission to advise the County on issues and the needs of people with disabilities, yet we were not approached to provide input into the bike plan and other plans prior to it going for approval by the Council. We recommend that all transportation plans be vetted ahead of time and be signed off on by agency American with Disabilities Act Compliance Managers and the Montgomery County Commission on People with Disabilities. There is a saying “Nothing for us, without us”. And surely not after it is done, but in the pre-planning stages. This will save both lives and resources.

c: The Honorable Marc Elrich, County Executive  
The Honorable Sidney Katz, President, County Council  
Dr. Raymond Crowel, Director, DHHS  
Dr. Odile Brunetto, Chief, Aging & Disability Services, DHHS

**From:** [Dan Wilhelm](#)  
**To:** [MCP-Chair](#)  
**Subject:** July 23, Item 12 Hearing  
**Date:** Wednesday, July 22, 2020 11:41:30 AM  
**Attachments:** [Complete streets.docx](#)  
[image001.png](#)

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

If the table doesn't print correctly, the word document is attached.

## Greater Colesville Citizens Association

PO Box 4087  
Colesville, MD 20914  
July 22, 2020

Montgomery County Planning Board  
Attn: Casey Anderson, Chair  
8787 Georgia Ave  
Silver Spring MD 20910

Re: Complete Streets

Dear Chairman Anderson:

The Greater Colesville Citizens Association (GCCA) has a number of comments on the Draft Complete Streets Design Guidelines, which follow.

1. Terminology not Consistent in Chapter 2. When we read different terms in technical or legal documents (including this master plan), we assume that they are not the same and strive to determine the difference. For example, what is the difference between medium and moderate? What is the difference between frequent and high? We think of them as the same. We propose the terms: "very high, high, moderate, low and none" be used to express differences in pedestrian and bicycle activity, vehicle activity, and transit activity.
2. Levels not Consistent in Chapter 2. The levels are not consistent between land use and the applicable streets. How can the downtown land use for pedestrian and bicycle activity be very high but the streets be only high or moderate. The same question arises for transit activity (most of the transit activity is from buses, not Metrorail). We prepared the following table that contains levels in use in the draft document. Then our suggestions are shown in bold, italic and underlined text. Our proposal also corrects for terminology inconsistencies.
3. Relationship to MPOHT Needed. It is not clear what road type the proposed streets are in relationship to the Master Plan of Highways and Transitways, which was approved just in December 2018. These two documents use totally different names for the same level of street. We recommend that Complete Streets Design Guidelines include a table that provides the

relationship with the road types found in the MPOHT. The table that follows contains in Column A our understanding of the relationship with the MPOHT.

4. Relationship of Residential Streets. When comparing Figures 2-33 and 2-34 with 2-36 thru 2-38, the only difference between a residential street (secondary) and residential yield street is whether there are many vehicles parked on the street. Whether residents decide to park on the street most often has to do with the land-use density. Where the land zoning is R-90 and below people frequently park on the street (residential yield street) and for zoning above R-90 few people park on the street (residential street). This doesn't apply to a primary residential street since they are wider with two travel lanes plus parking on both sides (see Figure 2.32).

MPOHT Road Name	Land Use Context and Related Street Types	Ped & Bicycle Activity	Vehicle Activity	Transit Service
	<b>Downtown Land Use (page 18)</b>	<b>Very High</b>		<b>Very High</b>
Major or Arterial	Downtown Blvd (page 24)	high ( <i>Very High</i> )	High	Frequent ( <i>High</i> )
Business Street or Arterial	Downtown Street (page 26)	high	Moderate	Moderate or Frequent ( <i>Moderate</i> )
	<b>Town Center Land Use (page 19)</b>	<b>Medium to High (<i>High</i>)</b>		<b>Medium (<i>High</i>)</b>
Major or Arterial	Town Center Blvd (page 30)	high or moderate ( <i>High</i> )	Moderate or High	Frequent ( <i>High</i> )
Business Street or Arterial	Town Center Street (page 32)	Moderate to High	Moderate	Moderate
	<b>Suburban Land Use (page 19)</b>	<b>Medium to Low (<i>Moderate to Low</i>)</b>		<b>Medium to Low (<i>High, Moderate, Low, None</i>)</b>
Freeway, Interstate	Major Blvd (Page 28, <i>Could be urban in nature</i> )	Low ( <i>Low or None</i> )	High	Moderate to Frequent ( <i>High, Moderate, Low, None typically on side roads</i> )
Major Road or Arterial	Neighborhood Connector (page 34)	Moderate ( <i>Moderate to Low</i> )	Moderate or High	Frequent ( <i>High or Moderate</i> )
Minor Arterial	Neighborhood Street (page 36)	Moderate ( <i>Moderate to Low</i> )	Moderate	Moderate or High ( <i>Low</i> )
Primary or Secondary Residential	Neighborhood Yield Street (Page 38)	Moderate ( <i>Moderate to Low</i> )	Low	Limited or None ( <i>None</i> )
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Industrial Street	Industrial Street (page 40)	Moderate ( <i>Low</i> )	Moderate	Moderate ( <i>Low</i> )
	<b>Country Land Use (page 20)</b>	<b>Low</b>		<b>Low</b>
County Arterial	County Connectors (page 42)	Moderate or Low ( <i>Low</i> )	Moderate or High	Moderate or low ( <i>Low or None</i> )
County Road	County Road (page 44)	Moderate or Low ( <i>Low</i> )	Moderate or High	Moderate or Low ( <i>None</i> )

5. US29 BRT. BRT on US29 is 14 miles and that number should be used on Page 7. The current design has separated travel lanes north of Tech Road which is not 9 miles found in the draft master plan so the number there is not correct. We also question the distance for the Purple Line.
6. Lane width. Lane width is proposed to be 10.5 or 11 feet for many road types. We think this is too narrow for safe passage of vehicles. A school bus is 8 feet and a 40 foot-long metro bus and tractor trailer are 8.5 feet. These measurements surely don't include the side mirrors which can extend out at least another two feet (one foot on each side.) A large 10.5 foot vehicle can't often be driven in the exact center of a lane. Also, the narrower road width will slow down the traffic, which is one objective but the slower speed also adds to congestion since the slower speed reduces the road capacity. We think the lane width should be at least 11 feet.
7. Roundabouts. We have found that the mini roundabout shown in Figure 6-16 does not provide

enough space for large vehicles to go around them. Rather, the back wheels just go over the planted area in the middle. We had them removed for that reason in Colesville.

8. Design Speed too low in Section 9.2. We recommend that the design speed for residential streets be split so the target speed for primary residential streets is 25mph, and 20 mph for secondary streets.
9. Road Pavement. In section 6.12, the road pavement at bus stops should be constructed with concrete rather than asphalt to keep the road service from being pushed up during hot summers outside of where the tires run. We have seen cases where the asphalt is 3-4 inches higher than the surface where the tires run and vehicles with low clearance actually scrape their under carriage. That condition is unsafe for the operation of cars.
10. Transit stop locations. WMATA and Ride On need to share bus stops to minimize the confusion to the public and reduce the impact on others using the road. *The* location of near-side or far-side should consider the impact on reducing road capacity for other vehicles. For example, where there is a high volume of right-turns, the near-side stop should be avoided if possible. (These are problems on New Hampshire Ave northbound at Powder Mill Rd.)

Thank You for considering our suggestions.

Sincerely

Daniel L Wilhelm, GCCA President

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Sincerely

Daniel L Wilhelm, GCCA President

**From:** [Charles Crawford](#)  
**To:** [MCP-Chair](#)  
**Cc:** [marc.elrich@public.govdelivery.com](mailto:marc.elrich@public.govdelivery.com); [Councilmember.Katz@montgomerycountymd.gov](mailto:Councilmember.Katz@montgomerycountymd.gov);  
[christopher.conklin@montgomerycountymd.gov](mailto:christopher.conklin@montgomerycountymd.gov); "Hucker, Thomas"  
**Subject:** Serious concerns with " Complete Streets " and associated documents and activities.  
**Date:** Wednesday, July 22, 2020 12:44:51 PM

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**[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.**

Memorandum:

To: Mr. Casey Anderson: Chair: Montgomery Planning Board.  
From: Mr. Charles Crawford: Past President: Capital Area Guide Dog Users Inc.  
Date: July 22, 2020.  
Via: Electronic Mail:  
Re: Serious concerns relative to the " Complete Streets " and associated documents.

I write to you this morning to request that the Montgomery Planning Board revisit the entire process and program of complete streets and associated activities such as Vision Zero with a view towards insuring the participation and approval of Montgomery County residents with Disabilities in general and Blindness in particular. I do not make this request lightly, and nor do I do this without having raised the following issues both at meetings with County officials and town hall meetings. Before going further, please let me associate myself with the comments of the County Commission on persons with disabilities, and with the President of the National Capital Area Chapter of the American Council of the Blind of Maryland.

1. Cagdu strongly objects to the construction of the so called " Floating Bus Stops " since they have been constructed to accommodate bicycle lanes along side of sidewalks and thusly creating dangerous crossings for Blind and otherwise disabled person. We have worked with County staff to try and make the bus stops more safe, and while some progress has been made, we still maintain these stops remain dangerous and ought to be torn down and the buses returned to the original stops at the sidewalk.
2. While we have seen some increasing activity on the part of the County to work with us and the larger Disability community on the planning and realization of the various plans associated with Vision Zero, we have seen little concrete action on the part of the County to realize an environment that truly meets the objectives of Vision Zero for all community residents. In fact, if you look at the 7 goals of Vision Zero, all but the first are violated by the current County Activities.
3. We sincerely appreciate the intentions of the County to create a highly usable travel environment for County residents, however intentions without successful activities to accomplish them are little more than friendly gestures without real follow up.

In closing, I ask that you work with the County and our community to successfully design and environment where Pedestrians of all stripes can continue to use the infrastructure that has traditionally been constructed for them, Bicyclists and other moving vehicles be given the proper consideration to insure their enjoyment of and safe use of the space made available for them, and that traditional space and sidewalks continue to be available to traffic and Paratransit vehicles.

These are serious concerns and should the County choose to move forward without the cooperation and assistance from our communities, then I shall recommend to the concerned parties that we seek whatever legal remedies we may have available to us to insure our safety.



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