MCPB
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Montgomery County Complete Streets Design Guidelines Work Session #1

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Completed: 09/03/2020

RECOMMENDATION

Staff is seeking Planning Board comments on the Public Draft of the Montgomery County Complete Streets Guidelines version 1.0. Planning staff and Andrew Bossi, from the Montgomery County Department of Transportation, will summarize and review the guidelines as well as public testimony received as part of the Public Hearing held on July 23, 2020. This review is anticipated to take 4 to 5 work sessions. Work Session #1 will focus on the overall comments received and a review of specific comments related to the vision, public process and street typologies presented in the study. At the end of all work sessions and at the Planning Board's direction, staff will consolidate Planning Board comments into a letter to the County Executive and the County Council. Staff will also draft applicable revisions to the guidelines document, which will be forwarded to the County Executive and the County Council along with the letter for further review and consideration.

INTRODUCTION

A public draft of the Montgomery County Complete Streets version 1.0 has been prepared jointly by Montgomery Planning and the Montgomery County Department of Transportation. This document was provided to the Planning Board for the June 23 Public Hearing. We recommend that Planning Commissioners bring this document to all work sessions.

PUBLIC TESTIMONY

A total of 16 letters were submitted to the Chair's office between July 21, 2020 and August 4, 2020. A list of the individuals and their affiliations are listed on the following page. Attached with this staff report as Attachment A is the public testimony received at and following the July 23 Public Hearing. Attachment B is a detailed summary of the testimony received noting the name of the commenter, subject area of comment, relevant chapter in the document, and comment provided.

Testimony – Received by the Chair's Office for the Complete Streets Design Guidelines

Number	Name	Representing	Page(s) in Attachment A	Comments in Attachment B
1	Shruti Bhatanagar	Sierra Club Montgomery County	29	NA
2	Robert Tworkowski	Rustic Roads Advisory Committee	32-33	5, 6
3	Allison Gillespie	Self (Chair of MCCPTA Safe Routes to School)	44-45	7-9
4	Kristy Daphnis	Self (Chair of PBTSAC)	41-43	10-18
5	Lori Bowes	Self	58-63	19-29
6	Melvin Tull	Self	30-31	30-38
7	Jane Lyons	Coalition for Smart Growth	34-35	39-44
8	David Helms	Self	36-40	45-63
9	Peter Gray	Washington Area Bicyclist Association	56-57	64-71
10	Charles Crawford	Capital Area Guide Dog Users, Inc.	27-28	72-76
11	Dan Wilhelm	Greater Colesville Citizens Association	21-26	77-86
12	Dr. Seth Morgan & Patricia Gallalee	Commission on People with Disabilities	18-20	87-96
13	Scott Plumer	Darnestown Civic Association	9-17	97-114
14	Gilbert Chlewicki	Self	3-8	115-164
15	Miriam Schoenbaum	Self	1-2	165-176
16	Jack Cochrane	Montgomery Bicycle Advocates	46-55	177-237

Work Session No. 1 – Comments for Review/Response

Work session No. 1 will focus on a summary presentation of the Public Hearing process, and then staff will review with the Planning Board comments and proposed responses related to the study Vision, Public Process and Street Typologies in Work Session No. 1. There are 67 comments in these categories.

From: M Schoenbaum
To: MCP-Chair
Subject: Comments on draft Complete Streets Design Guide
Date: Tuesday, July 21, 2020 11:23:47 AM

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
Boyds 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

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 convertis 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 **N**CHRP (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 cyclsits. 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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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
scott.plumer@verizon.net
301-367-6632

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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 meet 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 quite 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

[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,
Aging and Disability Services| 401 Hungerford Drive, Rockville, Maryland 20850
Direct: (240) 777-1256 | Cell: (240) 418-4865|
Like us on Facebook: facebook.com/MCCPWD and facebook.com/MCGCVA
www.montgomerycountymd.gov/cpwd
www.montgomerycountymd.gov/veterans
"Strive for progress, not perfection."

Take 10 minutes to be counted now – visit: https://2020census.gov/

For COVID-19 Information and resources, visit:
www.montgomerycountymd.gov/COVID19

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

[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
	Downtown Land Use (page 18)	Very High		Very High
Major or Arterial	Downtown Blvd (page 24)	high *(Very High)*	High	Frequent *(High)*
Business Street or Arterial	Downdown Street (page 26)	high	Moderate	Moderate or Frequent *(Moderate)*
	Town Center Land Use (page 19)	Medium to High *(High)*		Medium *(high)*
Major or Arterial	Town Center Blvd (page 30)	high or moderate *(high)*	Moderate or High	Frequent *(high)*
Business Street or Arterial	Town Center Street (page 32)	Moderate to High	Moderate	Moderate
	Suburban Land Use (page 19)	Medium to Low *(Moderate to Low)*		Medium to Low *(High, Moderate, Low, None)*
Freeway, Interstate	Major	Low (*Low or None*)	High	Moderate to Frequent (*High, Moderate, Low, None typically on side roads*)
Major Road or Arterial	Blvd (Page 28, *Could be urban in nature*)	Moderate *(Moderate to Low)*	Moderate or High	Frequent *(High or Moderate)*
Minor Arterial	Neighborhood Connector (page 34)	Moderate *(Moderate to Low)*	Moderate	Moderate or High *(low)*
Primary or Secondary Residential	Neighborhood Street (page 36)	Moderate *(Moderate to Low)*	Low	Limited or None *(None)*
Secondary or Tertiary Residential	Neighborhood Yield Street (Page 38)	Moderate *(Moderate to Low)*	Low	None
	Industrial Land Use (page 20)	Low to Moderate		Moderate
Industrial Street	Industrial Street (page 40)	Moderate *(Low)*	Moderate	Moderate *(Low)*
	Country Land Use (page 20)	Low		Low
County Arterial	County Connectors (page 42)	Moderate or Low *(Low)*	Moderate or High	moderate or low *(Low or None)*
County Road	County Road (page 44)	Moderate or Low *(Low)*	Moderate or High	Moderate or Low *(None)*

-

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

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

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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.

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Thank You for considering our suggestions.

Sincerely

Daniel L Wilhelm, GCCA President

From:	Charles Crawford
To:	MCP-Chair
Cc:	marc.elrich@public.govdelivery.com; Councilmember.Katz@montgomerycountymd.gov; 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

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.

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

Shruti,

Thank you for your support of the design guide. It has been a great example of collaboration toward a shared goal.

Sincerely,

Chris

Christopher Conklin, Director
Montgomery County Department of Transportation
240-777-7198

From: Shruti Bhatnagar <shruti.bhatnagar@mdsierra.org>
Sent: Thursday, July 30, 2020 1:24 PM
To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>; mcp-chair@mncppc-mc.org
Cc: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>
Subject: Sierra Club letter supporting Complete Streets Design Plan

[EXTERNAL EMAIL]

Dear Chair Anderson and Planning Board members –

I am sharing a letter as an attachment to this email, on behalf of the Sierra Club Montgomery County group in support of the Complete Streets Design Guide. We are impressed and enthusiastically support this guide which is aligned with the Sierra Club Montgomery County Land Use and Transportation committees' principles, stated in the letter.

We believe that if it's advice is followed, it will contribute to safer and more pleasant streets that address mobility for all users. We look forward to the Planning Board approving the Guide and urge the County to follow the Guide's advice as it makes future transportation decisions.

Best,
Shruti

Shruti Bhatnagar
pronouns: she/her/hers
Chair, Sierra Club Montgomery County Maryland
Cell:240-498-3459
shruti.bhatnagar@mdsierra.org

https://www.sierraclub.org/maryland/montgomery-county

Chairman Anderson, Commissioners:
Please include this letter in the record of Complete Streets public hearing on July 23, 2020.

I admire your stamina to read through the Complete Streets document, consider the many parameters it brings together and sort through the many possible ways those features may be expressed in the future. Fortunately, staff descriptions of this Complete Streets document have dubbed it "aspirational" rather than guidelines or other regulatory form.

Complete Streets is well illustrated, but casual reading discovers minor oversights that raise concern about the whole, such as Figure 4.16 which misidentifies a Bethesda location as Silver Spring.

Starting at that point one must wonder about the foundation of Complete Streets. It is built upon the "responsibility" of the county to maintain the infrastructure resulting from good ideas in the report. Before you call for raised crosswalks/speedtables at downtown street intersections I ask you to look outside your office building at the broken, heaved, unmaintained 1980s brick sidewalk and consider again whether the proposed infrastructure can survive an absence of the required maintenance, repair and replacement. That sidewalk is the basic pedestrian environment. When the sidewalk provides such an uneven and unsafe example of unreliable maintenance can Complete Streets move forward without including a mechanism for the county to do the maintenance?

One thing missing in the prescription for a sidewalk is consideration of signage for the businesses and shops that line the sidewalk behind the trees and bike lanes along commercial area downtown streets and boulevards. I believe part of the vitality of a commercial area, particularly a downtown, involves being able to tell you are in a commercial area, to see the shops, to identify them. If the only place Complete Streets will allow a shopkeepers sign to be seen is at a big box plaza, where the big box gets the visible signage, you should think it through again. To inform a person riding through on a bus, or even in a car, Complete Streets designers should consider novel approaches. Perhaps a county installed electronic signboard in each block for the merchants in that block would be a bit ahead of its time, but please seek a way to avoid cutting off the shops from the customers.

Complete Streets is a compilation of Engineering Design. Engineering is one of the 3 E's for road safety. Enforcement is another, easily dumped on the police. The third, often overlooked is Education. Education should be addressed here because Complete Streets embarks on a wild ride of new mixes of features. Just as the sudden appearance of painted stripes and green areas of new bikeways were a dangerous mystery to pedestrians, drivers, bus operators, and bike riders, Complete Streets proposed to create a confusing new mix that will not be continuous from block to block, or even within a block. Education needs to be highlighted and stressed as any part of Complete Streets is implemented. Not just a news release, a web page, or a pamphlet placed in a rack at the Transit Center.

Next a word about commercial downtown areas. Not all shops have an alley behind, and many do not go through to the alley, so please don't rely on a street plan that does not recognize a need for deliveries and trash/garbage pick-up from the front, across the sidewalk, through the trees, across the bike lane, etc. Please think it through, particularly the garbage storage and collection process.

Last, but not least, the future fast approaches and Complete Streets should be ready for many possibilities. I think here of 5G transmission and the need for much larger poles with antennas in the sidewalk environment. Have we been told yet how the 5G wavelength is affected by trees?

As you and I continue to contemplate the complexities of Complete Streets lets work together to figure out where to pile snow, whether economic conditions suggest the time has come for a sidewalk Homeless Tent Zone, and whether Montgomery County climate change efforts should include painting road surfaces heat reflective white?

Thank you for the opportunity to contribute to the Complete Streets discourse.
Mel Tull

Melvin Tull
301-717-2327

RUSTIC ROADS ADVISORY COMMITTEE

July 30, 2020

Casey Anderson, Chairman, and Commissioners Fani-Gonzalez, Cichy, Patterson and Verma
Montgomery Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

RE: Complete Streets Design Guide Public Hearing

Dear Chairman Anderson and Commissioners:

One of the duties of the Rustic Roads Advisory Committee is to review and comment on County policies and programs, and to advise the Planning Board, the County Executive and Council on matters that may affect the Rustic Roads. As such, we have reviewed the Draft Complete Streets Design Guidelines. We are greatly impressed with the scope and detail of the guide.

During our meeting on July 24, 2020, our Committee voted unanimously in support of the draft guidelines with the following comments. We appreciate that in the document under the section in Chapter 2, Rustic and Exceptional Rustic Roads are included as Special Street Types, and that it is made clear that the Rustic Roads code supersedes the information in the Guide, since rustic and exceptional rustic roads have specific legal protections.

We would like to recommend additional language to state that roads are added and removed from the Rustic Roads program through local master plan amendments as well as through amendments to the Rustic Roads Functional Master Plan.

Safety for all users on rustic roads is important to the Committee. Therefore, the Guidelines' confirmation of the need for reduced speeds in order to reduce crashes is strongly supported by the Committee. We appreciate seeing research showing that narrower travel lanes can contribute to lower operating speeds and reduced crash rates and severity. Chapter 9 on Speed Management addresses target speeds, and the Committee would welcome a review of whether lower target speeds in some areas on some rustic roads could help reduce crashes and crash severity. We support the use of "Neckdowns" as tools for narrowing the travelway to a single lane, encouraging motorists to yield to oncoming traffic before proceeding, and this tool is used to provide for safe and slow passage over our one-lane bridges on rustic roads.

Thank you for giving us the opportunity to review and comment on this document. If you have any questions, you may reach our committee through our staff coordinator, Darcy Buckley, at 240-777-7166 or Darcy.Buckley@montgomerycountymd.gov.

Sincerely,

Robert J. Tworkowski, Chair
Rustic Roads Advisory Committee

Committee Members: Todd Greenstone, Laura Van Etten, Dan Seamans, Robert Wilbur, Kamran Sadeghi, Lonnie Luther, Leslie Saville (M-NCPPC)

cc: Stephen Aldrich, Master Planner/Supervisor, M-NCPPC
Jason Sartori, Chief, FP&P, M-NCPPC

Coalition for Smarter Growth
DC • MD • VA

July 21, 2020

Montgomery County Planning Board
8787 Georgia Ave.
Silver Spring, MD 20910

Item 12 – Complete Streets Design Guide (Support)

Testimony for July 23, 2020

Jane Lyons, Maryland Advocacy Manager

Good evening and thank you to Chair Anderson and Planning Commissioners. My name is Jane Lyons and I'm speaking on behalf of the Coalition for Smarter Growth, the leading organization in the D.C. region advocating for walkable, inclusive, transit-oriented communities. We enthusiastically support the Complete Streets Design Guide.

Thank you and congratulations to the staff who worked on this project – who has yet again solidified Montgomery Planning as a national leader in creative suburban planning. We are pleased that the Complete Streets Design Guide is clear in prioritizing safety, sustainability, and vitality, and provides a roadmap for how to balance competing needs. When we prioritize street space correctly, streets can become an engine for healthy people, a healthy economy, and a healthy environment.

The biggest challenge in actualizing safe, green, vibrant streets is reengineering the county's arterial roads, especially in lower income neighborhoods where traffic fatalities are more common. The vision in Thrive 2050 is for these arterials to become safe, green, multimodal boulevards, and this document will be a critical guide for those changes.

A few constructive comments:

- Page 55: We'd like it to be clear that a sidepath is always preferable to bikeable shoulders.
- Page 57: We recommend that bikeways be listed as a high priority for downtown boulevards, downtown streets, town center boulevards, and town center streets.
- Page 82: Bus shelters, in addition to BRT stations, should consider opportunities to provide additional passenger amenities such as seating, local area information, wayfinding, and real time traveler information.
- Page 88: We urge the county to update its policy for snow events. Especially in downtowns and town centers, the county – not the building owners – should be responsible for clearing snow on sidewalks, sidewalk ramps, and sidewalk-level bicycle facilities.
- Page 232: Public engagement should also include on-the-street direct outreach strategies, as well as strongly encourage paid community focus/advisory groups to ensure diverse input for major decisions.
- Finally, we ask that the design guide be open to amendment upon the completion of the Pedestrian

Master Plan and Vision Zero Action Plan.

Implementing the Complete Streets Design Guide is key to achieving the county's Vision Zero goal, as well as improving connectivity and helping shift mode-share away from single occupancy vehicles. We look forward to the comprehensive update of the Master Plan of Highways and Transitways that is necessitated by the guide, along with its implementation throughout new projects, resurfacing, construction, and maintenance. Wherever possible, we encourage the Planning Board, MCDOT, DPS, and the Council to codify the guide into law and regulation.

Thank you for your consideration.

TO: Montgomery County Planning Board
Casey Anderson, Chair
8787 Georgia Avenue
Silver Spring, Maryland 20910
Email to MCP-Chair@mncppc-mc.org
Staff:
Email: stephen.aldrich@montgomeryplanning.org

FROM: David Helms, member Pedestrian, Bicycle, and Traffic Safety Advisory Committee (PBTSAC)

SUBJECT: Recommended changes to the draft Complete Streets Design Guide (CSDG), Item 12 of July 23, 2020 Planning Board Agenda

Dear Planning Board Members,

Clearly, a Planning Staff has developed a significant list of specific treatments which may be implemented to achieve a contect "Complete Street". This is an impressive body of work!

Unfortunately, the Complete Streets Design Guide (CSDG) does not provide adequate description of how these various treatments will *function as a system* "ensuring that the transportation network as a whole provides safe and efficient access for all roadway users and only provides designated spaces for each mode when needed." (Ref: p.2 Complete Streets definition).

Based on the draft Complete Streets Design Guide's issues, offer the following recommendations.

A. Complete Streets Design Guide (CSDG) does not provide adequate description of how these various treatments will *function as a system (network)* "ensuring that the transportation network as a whole provides safe and efficient access for all roadway users and only provides designated spaces for each mode when needed." (Ref: p.2 Complete Streets definition)

Specific Recommendation: The term "Speed Management" and "Target Speed" should be removed and replaced with "Safe Speed" to emphasize prioritization of all road users based on health outcomes.

Specifically, Section 5.7 Network Connectivity (p.112) is totally inadequate in providing guidance on achieving Complete Streets as a system. This section should be re-written based on the following:

General Plan - Thrive 2050 Vision

Complete Communities
https://montgomeryplanning.org/planning/master-plan-list/general-plans/thrive-montgomery-2050/complete-communities/
https://montgomeryplanning.org/wp-content/uploads/2020/07/PDF-Goals-Policies-Complete-Communities.pdf
"Complete communities in urban areas will include every element necessary to support daily life within a 15-minute walk, with a mix of uses and high-density commercial and residential development near Metrorail and Purple Line stations. Complete communities in suburban areas will be located around and near MARC and Bus Rapid Transit (BRT) stations and will support a mix of uses as well as moderate density housing, including types such as duplexes, triplexes, and low-rise multifamily buildings. Complete communities in suburban and rural communities will be supported by microtransit and characterized by a variety of uses, amenities and housing types to meet daily needs."

- Complete communities include a built environment with a mixture of uses; diversity of housing for all ages and abilities; and parks, trails and open spaces where people from different backgrounds can gather, be active and live healthy lifestyles.
- Each complete community allows safe and comfortable walking, rolling and biking access to destinations and integrates nature, arts and culture into its streets, buildings and infrastructure.
- Complete communities also provide access to food, healthcare, education and transit.
- Complete communities are equitable, anchor a strong economy and function sustainably to mitigate the impacts of climate change.

Safe and Efficient Travel
https://montgomeryplanning.org/planning/master-plan-list/general-plans/thrive-montgomery-2050/transportation-2050/
In 2050, Montgomery County's high-quality transportation system plays a critical role in supporting the county's economic health, environmental resilience and equity. County residents shifted from heavy reliance on private vehicles to public transit, the backbone of the county's transportation network. This safe, reliable and efficient transit network is composed of Metrorail, Purple Line, commuter rail, bus rapid transit (BRT) and regional and local buses, and a robust network of sidewalks, bikeways and trails. A large majority of people use the system to connect to their destinations within the county and the region. Technologies such as micromobility, autonomous vehicles and ridesharing offer new options for transportation. Some of this technology increases transit ridership by making it easier for people to connect to rail or BRT. Major roadways are transformed into safe and attractive boulevards with reduced speeds, trees and dedicated lanes for transit. Walkable and bikeable paths and crosswalks are safe enough to allow children to walk and bike to nearby schools. In Central Business Districts (CBDs) and town centers, a dense mix of land uses and high-quality walkways and bikeways make walking, bicycling, rolling and micromobility the preferred modes of travel.

Transit/Travel Circulation systems that should be specifically addressed as Complete Street Network Connectivity "systems" (but not mentioned in the CSDG) :

1. Neighborhood to Transit, City and Towns Complete Street Networks

    a. Bicycle Ride Sheds: Complete Streets systems 2.0 miles
    b. Walk Sheds 3.5 ft/sec = 0.6 mile
2. Home to School Networks
    a. Safe Routes to Schools
3. Neighborhood to Bus Stops Networks
4. Long Range (>3 miles) Bicycle Commuter Networks

B. The CSDG does not incorporate incorporate "Safe Speed Approach"

Specific Recommendation: The term "Speed Management" and "Target Speed" should be removed and replaced with "Safe Speed" to emphasize prioritization of all road users based on health outcomes.

1. **Issue: "Target Speed" should be re-written to incorporate "Safe Speed Approach"**

Sections 3.2 Street Design Parameters (p.54) and Speed Management (p.203) should be re-written to incorporate NATCO "Safe Speed Approach".
https://nacto.org/safespeeds/
https://nacto.org/wp-content/uploads/2020/07/NACTO_CityLimits_Spreads.pdf

- Setting default speed limits on many streets at once (such as 25 mph on all major streets and 20 mph on all minor streets),
- Designating slow zones in sensitive areas, and
- Setting corridor speed limits on high priority major streets, using a safe speed study, which uses conflict density and activity level to set context-appropriate speed limits.

2. **Issue: Target Speed and State Law Transportation Statute**

Specific Recommendation: The CSDG should not adopt current Maryland Transportation statute minimum speed limits by street type if that speed does not provide adequate protection for the likely road users. The CSDG should state what the Safe Speed should be using best available science, and if the Safe Speed is in variance with state law, footnote that.

Related Action: Amend the State Transportation Statute

Final Report of the Task Force to Study Bicycle Safety on Maryland Highways
http://www.mdot.maryland.gov/newMDOT/Planning/Bike_Walk/Documents/Update_2018/MD_Bicycle_Safety_Task_Force_Final_Report.pdf

Executive Summary: The Task Force to Study Bicycle Safety on Maryland Highways was created by legislation in the 2017 Session of the Maryland General Assembly and was enacted under Article II, Section 17(c) of the Maryland Constitution as Chapter 836.

Chapter 836 included a series of eleven specific topic areas to be addressed by the Task Force, all pertaining to various elements of bicycle safety.

Table 1. Summary of Task Force Recommendations
1 Legislative Tools
1.7 The legislature should consider legislation to allow state and local agencies to adopt lower speed limits on key roadways targeted for bike safety issues and should adopt a mechanism for state and local agencies to consider lower default speed limits.

C. The CSDG should be re-written to incorporate "Safe Speed Approach"

Specific Recommendation: The CSDG should incorporate National Safety Council "Safe System Approach"
https://www.nsc.org/safety-first-blog/road-to-zero-taking-a-safe-system-approach
http://www.pedestriansafetysummit.com/PPT_FHWA%20Ops16_OnCall_Paniati_Jul20.pdf
http://staging.nxtbook.com/ygsreprints/ITE/ITE_May2020/stage.php#/p/26
https://www.ite.org/pub/?id=C8B1C6F9-DCB5-C4F3-4332-4BBE1F58BA0D

- Seeking safety through the aggressive use of roadway design and operational changes
- Fully integrating the needs of all users (pedestrians, bicyclists, older, younger, disabled, etc.) of the transportation system

D. Neighborhood Yield Streets (p. 38) definition and assumed facilities are inaccurate

Specific Recommendation: Neighborhood Yield Streets Safe Speed (Target Speed) should be a range, 15 mph to 20 mph, based on level of pedestrian demand, traffic, and sightline/obstruction visibility.

"These streets feature sidewalks on both sides of the street, though in retrofit conditions, some Neighborhood Yield Streets may only have sidewalks on one side.

This assumption is demonstrably inaccurate. Many "Neighborhood Yield Streets" have NO sidewalks and likely never will. Therefore, the predominant model of travel for pedestrians will *be in the street*. This inaccurate assumption on the likelihood of sidewalks (and potentially Transportation Statute minimum speed limits) force the "target speed" for "Neighborhood Yield Streets" to be 20 mph (Fig 3.2 and Fig 9.2). Many jurisdictions across the US and several in Maryland (Baltimore City and Calvert County) legally allow a minimum speed limit of 15 mph.

Very Respectfully,

David Helms
409 Lanark Way
Silver Spring, Maryland 20901

301-466-5561
david.helms570@gmail.com

Stephen and Andrew,

Thank you for extending the comment period for the draft Complete Streets Guide. The Pedestrian, Bicycle, and Traffic Safety Advisory Committee (PBTSAC) very much appreciated your presentation to our Committee on July 23, 2020 - it was very informative and helpful. While the PBTSAC has not voted on specific language and input included in these comments, they are intended to capture the spirit of the Committee's discussion on the topic during that 7/23 meeting. I am sending these comments directly to you, but please let me know if there is a "formal" submission process for the docket or other email address I should send them to, as well. I have cc:ed PBTSAC Members, Montgomery Planning leadership, and the Planning Board.

We appreciate the comprehensive vision set forth in this Guide, and the collaborative spirit exhibited by both the Montgomery County Planning Department and the Montgomery County Department of Transportation. The document is very principles-driven, which we appreciate. We are encouraged by the thoughtful tie-ins to Vision Zero, and the way in which it navigates space in between zoning regulations, land use regulations, and other laws; as well as broad alignment with the Maryland DOT's Context Driven Design concepts. We are also encouraged in the Guide's potential usefulness as an advisory document, and we hope that it will be followed by MCDOT, SHA/MCDOT, MCPS, and other developers - early in the planning and design phases of new development, construction, and renovations of existing properties. As a principle, we believe that all road users should have safe, separated spaces wherever feasible. We would like to also underscore the importance of continuing to take ADA accessibility seriously, and urge you to continue regular conversations with disability advocacy groups to ensure there are not unintentional accessibility barriers as complete streets are designed and implemented. One thing we do not see much of is a "lean in" to possible technological improvements that may come in the next several years - including smart traffic systems and vehicle to infrastructure communications. Admittedly, that may be out of scope for this document, but it is something that should be considered, on whether the infrastructure and curbside management will need to accommodate for these types of things - including automated delivery vehicles and other technologies that may need to use precious space. At the least, the document should leave open the possibility for additional design vehicle types to be easily added as addendum to the Guide in the future, if necessary.

Overall, the section on defining street types (Chapter 2) seems to be relatively comprehensive - with one exception. There is no mention of school facilities or school zones. While we agree that you wouldn't want to unnecessarily fragment this plan, which would diminish it's usefulness - we would argue that schools fall into a special category of land use. One in which the roads and safe design of the roadway is especially paramount - a crucial infrastructure feature that can help protect our children. If the rationale behind calling out central business districts or other street types is centered around the land use, and the nature and volume of pedestrian activity and other characteristics, why would we not want to define what a safe, "complete" street looks like adjacent to and around our schools? If we could prevent the death of one child by writing this Guide to specifically call out "School Zone Streets" (or, similar) as a street type, it would be well worth it. There is a history of lack of early coordination in school construction, and hardly any early coordination at all when it comes to the walk-shed (or bike-shed) surrounding a school. By including "School Zone Streets" as a specific street-type in Chapter 2 and throughout the document, some guardrails and parameters would be set forth to help prioritize various features to improve safety for our children and their families.

While we view schools as a somewhat special case requiring its own category, we also urge you to consider use cases on how to deal with other types of anomalies in contextual land use, where the built environment doesn't exactly "fit" with its nearby roadway infrastructure - such as a large apartment complex with heavy

pedestrian activity, situated along a Major Highway or roadway that may be categorized or designed in a way that doesn't fully account for the level of pedestrian activity. Since the minimum crossing distances are so far apart, there are likely to be an overabundance of unsafe midblock or unsignalized crossings, if the infrastructure is not designed well. Providing suggestions for how to put in place targeted safety countermeasures (signalized crossings based on a relatively modest threshold of demonstrated need, judicious use of median barriers, etc.) may be helpful. One other suggestion is the inclusion of additional information and guidance on trail crossings. In Montgomery County, these are points of potential conflict between fast moving traffic, bicyclists and pedestrians.

Another important area of potential conflict are the commercial and passenger loading zones in our urban areas. This has been a particular concern around areas of new development recently, with Bethesda as a prime example. Developers are currently not forced to provide adequate area for loading/unloading, and it's unclear whether the designs as depicted in this guide would further exacerbate this problem. The actual use of existing streets causes delivery vehicles, taxis, ride-shares, and others to either obstruct the pedestrian and bicycle areas, or obstruct a lane of traffic.

While we will not go into great detail in this comment document on the prioritization rubrics in Chapter 3, we do note that these prioritizations may need further input from stakeholders - and, we'd ask that you further engage the community on the content of Figures 3-3 and 3-4. These tables and the guidance contained within are extremely important, and should be fully vetted before finalization. With that said, we are encouraged to see the principle of "20 is Plenty" carried into several of the street types, including neighborhood streets. In general, we support the lowering of speed limits (and designing streets for lower speed), as lower speeds are shown to improve safety outcomes - particularly in pedestrian and bicycle crashes.

Recommendation 1: We ask that you consider further delineating the "roles of streets" section 1.2 of the document, breaking "Travel" into "Recreation" and "Transportation." This would be useful in helping to apply an equity lens to decisions, because it would help planners and others further contextualize the need for prioritization of certain streets and corridors that are often used for transportation to access necessities of daily living (commuting to work, going to school, accessing the grocery store and other necessary amenities in areas where residents aren't likely to own cars). "Recreation" uses would best be paired with "Social Engagement," versus "Travel." We'd like to offer to speak to this recommendation in the Planning Board's "Vision and Street Type" Work Session on September 10th.

Recommendation 2: We ask that you consider adding "School Zone Street" (or similar) as a Street Type in Chapter 2, and throughout. This would encourage early design process conversations (versus waiting until a mandatory referral), and would serve as a guide to developing safe and context appropriate roadways around schools to improve safety for all of our Montgomery County students and their families. We'd like to offer to speak to this recommendation in the Planning Board's "Vision and Street Type" Work Session on September 10th.

Recommendation 3: We ask that you consider further guidance on information specific to trail crossings, whether it be in Chapter 2, 6, or another appropriate point within the document; and, that you consider providing more information on how to implement safety countermeasures in areas where the land use may not exactly match with the street type and design.

Recommendation 4: You've provided the legal definition of a crosswalk, which is helpful. Could you also provide a few visual depictions of legal crosswalks?

Recommendation 5: Please fully consider the impact of delivery vehicles, taxis, rideshare, and

other similar vehicles - and build in ways to protect the space and use by other road users. Also, consider whether curbside management or infrastructure may need to accommodate different types of new technology - leaving open the possibility to easily add additional design vehicle types in the future.

Recommendation 6: Please consider further public and stakeholder engagement before making final decisions on the content and prioritization in Figures 3-3, and 3-4. Please also consider reducing the minimum crossing distances across the board, or, define clear thresholds for showing necessity, and make these thresholds relatively low. The PBTSAC would be glad to discuss these tables and/or crossing distance thresholds in further depth at an upcoming PBTSAC or Planning Board/Planning Department/MCDOT Meeting.

Thank you so much for considering these comments. Please reach out with any questions - we stand by, ready to provide additional clarifications or input as necessary.

Sincerely,
Kristy Daphnis
Chair, Montgomery County Pedestrian, Bicycle, and Traffic Safety Advisory Committee

July 30, 2020

Thanks for extending the comment period on the Complete Streets Design Guide. I am glad to have the opportunity to provide feedback.

Although Montgomery County Council of Parent Teacher Associations (MCCPTA) has not taken an official position on the guide, several members of the Safe Routes to School Committee read through the proposed guide and I would like to ask you to consider the resulting feedback. We have worked hard over the last two years to make travelling to school safer for students, and the feedback we give here is based upon our observations and lessons learned.

Montgomery County Public Schools currently enroll more than 165,000 students. In a normal, non-COVID school year, those students travel over Montgomery County roads to 206 school buildings. Each of these buildings and all of that student travel has a tremendous impact on traffic and road use, not just for students but also for anyone living near the schools.

As such, we'd like to request that schools – and more specifically the roads near schools – be a part of this guide. Specifically, we request that "School Roads" (or similar) be added as a "Street Type" in Chapter 2. This would be consistent with calling out the special land use and transportation context around each school building and would provide guidance for how to best design roadways within these environments. It would spur these conversations early in the design process and serve as a guide to develop safe and context appropriate roadways to improve safety for all of our students.

It is striking that in your typography, there is no mention of schools nor is there a mention of school bus stops. Several tragic accidents over the last few years have involved school children, including the death of a young girl and a major accident that almost killed two teenagers waiting for their school bus in the morning. It is imperative that we consider the safety of students because something is clearly wrong with how we are approaching the way children travel to school right now. Street design plays a large role in that, and good design and engineering can go a long way to fostering a real implementation of the Vision Zero goals.

The movement of children in and out of the school is multi-modal, involving children riding on buses, in cars, on bikes and on foot. Walking and riding bikes to school is healthy and was part of the American way of life for centuries, but recently has been seen as unsafe by many parents, due to high speeds and unsafe, multi-lane roads that flank many schools.

We also anticipate that in the coming years there will be a continuing need to build in urban areas that are already built out, meaning that planners, the Department of Transportation, the State Highway Administration and others will need to retrofit tight urban areas to accommodate increased traffic associated with students coming and going at pick-up and drop-off times. We need more urban schools if we are to support transit-oriented development. And there is an increased demand for more schools in densely populated areas like Bethesda and Silver Spring. We believe that development near Metro and other forms of transportation is very good for many reasons. Roads design should not be an impediment to meeting the need for more educational facilities.

We are glad to see that the document specifically is intended for use on future streets, for times when capital improvements are made, or for resurfacing and other major street work. All of those things take

place near school buildings in this county on a regular basis, and yet your typography does not mention schools at all.

In general, coordination between Montgomery County Public Schools and the other county agencies has been sorely lacking. Ideally, this document could be one step in the right direction toward reeling in the school system and getting their construction plans to address Vision Zero. Right now, much of their school designs seem to completely lack the awareness of the need for pedestrian safety, and student movement to and from the building on bikes is almost entirely lacking, even in the newest of buildings. The infrastructure, as designed, discourages anyone from walking to or riding to school on bikes. Their planning seems to be focused on squeezing the largest possible building into a lot, and bus loops often seem shoe-horned in at the last minute as an afterthought. Very little consideration seems to be given to the bus journeys through the neighborhoods near schools, nor the way the buses will pull in and out of the school lots. As a result, principals at MCPS schools are often put in the position of being de-facto traffic engineers who must address tremendous safety concerns with little or no training in actual traffic calming -- and, teachers often step in before and after school, as crossing guard proxies and traffic control directors.

We'd like to ask that you add Schools into your typography.

We'd also like to ask that you design school streets/school zones to be uniform and consistent across the county and that, like for other street types, you consider:

-speed

-sidewalk requirements

-bike routes

-ADA accessibility

-safe pick up and drop off facilities that consider how school buses and cars travelling through nearby streets will need to interact at high volume times. This includes morning drop-off and afternoon pick-ups but also large events such as sporting events and graduations.

It is our hope that the guide will become a useful advisory document or model for MDSHA and MCDOT moving into the future.

Those of us on the Safe Routes to School Committee also would like to be included in any future communications about this guide so that we can more effectively partner with you.

Thanks for your time and consideration.

Alison Gillespie

MCCPTA Safe Routes to School Chair

Jack Cochrane, Chair,
Montgomery Bicycle Advocates
7121 Thomas Branch Dr.
Bethesda, MD 20817

August 4, 2020

Montgomery County Planning Board
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Members of the Planning Board:

As a member of the Road Code Stakeholder Work Group in 2008, I had the privilege of helping to develop the county's *Context Sensitive Road Design Standards*, a precursor to the new *Complete Streets Design Guide*. It's nice to see that the new guide places an even greater emphasis on reducing car speeds and protecting all road users.

But due to the advent of separated bike lanes (SBLs), street cross-sections have become more complex since 2008. The new draft guide doesn't fully capture that complexity.

Moreover, I found many parts of the guide confusing. The tables and text do not adequately explain certain street and bikeway configurations, and the whole guide may lack enough detail to fully inform street designs. The document lacks an overall summary of its street zone system and there are inconsistencies in the zone definitions and terms. I found the guide difficult to review because of this. I dare say the document was not ready to be released for public comment. The document should be significantly expanded and several sections rewritten. Then the guide should be re-released for public comment rather than move on to the next step.

I refer you to the aforementioned 2008 standards (which were amended in 2014 and possibly other times). They lacked the flashy graphics that would inspire the public, but they were remarkably clear. They took a simple approach of providing a large text section in plain English (describing everything from land use types to median dimensions), followed by typical street templates with widths, followed by detailed engineering specs. Montgomery County Council resolution 16-809 includes the entire document (as of 2008): https://apps.montgomerycountymd.gov/ccllims/DownloadFilePage?FileName=5751_1_7814_Resolution_16-809_Adopted_20081209.pdf (https://tinyurl.com/y5alwdzd) . At some point MCDOT literally drew the templates, which was helpful: https://www.montgomerycountymd.gov/DOT-DTE/Resources/Files/Design/MC-2003_08.pdf (https://tinyurl.com/y6jjo89r).

Below are my detailed comments on the May 2020 draft of the *Complete Streets Design Guide.*

GENERAL PROBLEMS

Missing synopsis of the guide's zone system

A key missing element is any kind of overall guide to the zone system near the front of the document. There is no textual synopsis of the system and there's just one diagram – Fig. 1-3 on p. 13. But that diagram includes almost no text, has errors, and doesn't depict a separated bike lane at all. One must figure out the zone system by reading the rest of the document, which is difficult given the guide's lack of clarity on SBLs .

To be an effective summary of the zone system, the diagram on p. 13 should be expanded into six (or at least 5) diagrams, corresponding to the most basic street templates. Each diagram should be accompanied by explanatory text. For purposes of a synopsis section, I've identified six high level templates:

A. No SBL (just a sidewalk/sidepath), and no on-road bike lanes; parking optional
B. No SBL (just a sidewalk/sidepath), with on-road bike lanes; parking optional
C. No SBL (just a sidewalk/sidepath), with shoulders and *no* parking
D. Street-level SBL, *no* parking, and a relatively narrow divider between the SBL and traffic
E. Street-level SBL, *with* parking, and with a relatively narrow divider between the SBL and parking
F. Sidewalk-level SBL, with a relatively wide landscaped street buffer on the street-side of the SBL; parking optional

The diagrams would show parking for each case except C and D. But for cases A, B and F, the parking would be labeled as optional. Possibly fewer templates could be depicted, since it's just a synopsis of the zone system. If just 5 are depicted, merge A with B (show on-road bike lanes in the diagram, but label them as optional).

The term "sidewalk-level SBL" isn't necessarily literal. Such an SBL might be at a lower grade than the actual sidewalk. But a "sidewalk level SBL" is almost always on the sidewalk-side of the curb.

What zone are SBLs in?

The document is confusing and contradictory as far as which zone SBLs are in. Are they in the Sidewalk Zone? The Curbside Zone? Some pages imply that they're always on the sidewalk side of the "street buffer" and thus in the Sidewalk Zone (p. 32), yet other pages put them in the Curbside Zone (p. 64 and figs. 5-1 and 5-2). Fig. 1-3 actually puts them in the "street buffer". None of the zone-specific chapters lay claim to SBLs in the text, though some include SBLs in their diagrams.

I've chosen to believe the pages that put SBLs in the Sidewalk Zone, specifically between the "street buffer" and the "sidewalk buffer". This has the semantic benefit of having "street buffer" always refer to the buffer between the SBL and the Street Zone, if an SBL is present. The buffer between the SBL and

the Pedestrian Clear Zone is then called the "sidewalk buffer". If there's no SBL, the "street buffer" is the area between the PCZ and the Street Zone, and there's no "sidewalk buffer".

In any case, I'd like to see SBLs placed in one zone and only one zone, regardless of whether they're street-level or sidewalk-level. This avoids having to always distinguish between street-level and sidewalk-level SBLs. But whatever is decided, just make it clear in the guide. If SBLs can be in two different zones, state that clearly and always say "street-level SBL" and "sidewalk-level SBL", not simply "SBL".

My comments reflect my understanding that SBLs are always in the Sidewalk Zone.

Confusion surrounding buffers.

The street cross section diagrams on pages 24-47 are confusing, at least where separated bike lanes (SBLs) are concerned.

- The single-letter abbreviations are inconsistent. In some diagrams, "SB" means "street buffer" and in others means "sidewalk buffer". "B" can mean either of those or some other buffer.
- On p. 26, the street buffer is simply referred to as a "buffer" according to the key. Presumably it should be identified as the "street buffer".
- On p. 30, the meaning of "parking lane" is muddled. On the left/inbound side of the diagram, the "P" (parking lane according to the key) refers to a wide raised buffer where parking isn't possible. That's downstream of an area of the same width but consisting of a parking lane next to a street buffer. One might be confused into thinking the "P" refers to both the parking area and the street buffer as a unit (side by side). The right/outbound side of the street uses "P" more clearly. To avoid having to add an explanatory note, just make both sides of the street the same as the right/outbound side.
- The three terms "Street Buffer Zone ", "Buffer Zone", and "street buffer" (sometimes upper case, sometimes lower case) seem to be used interchangeably. Use one term. (I'm just calling it "street buffer" to refer to the area as I've defined it, whether or not it's a zone).
- The very term "sidewalk buffer" is confusing. The *only* time a sidewalk buffer is present is if there's an SBL. It's essentially an "SBL-sidewalk" buffer. It could be called an "SSW buffer" or a "bike-ped buffer" or something.

Issues with Figure 1-3 on p. 13, "Street Zones defined":

- The caption itself is confusing, since it says "Street Zones defined", but "Street Zone" is one of the zones. Maybe the caption should be "Zones of a street, defined".
- The table is floating at the end of section 1.4, hardly where you'd put the guide to the entire zone system.
- The figure states that "bikeways" and "buffer" are among the uses of the "Street Buffer Zone". But bikeways are not in that zone.
- The figure shouldn't just say "bikeway" in the zones where bikeways may be located; it should be specific and identify bikeway types.

- In any case, this diagram should be replaced with 6 new diagrams and plenty of text, as I describe above.

<u>The table in Figure 3-2 on page 55 does not adequately cover streets with bikeways</u>.

- The "Street Buffer" row:
    - This row does not appear to reflect the fact that when an SBL is present, this buffer is positioned between the SBLs and the Street Zone. In this case, the "minimum" width should be 3', and the "preferred" width something wider (4'? 6'?).
    - On other other hand, if the bikeway is a *conventional* bike lane (or buffered bike lane), this statement is not true: *"The street buffer is the space between the travel or parking lanes and the bikeway or sidewalk."* The line needs to indicate which bikeway type(s) it's referring to, and do it correctly.
    - Generally sentences of that form are difficult to parse. Instead of saying "*between A or B and X or Y",* say *"between A or B on one side, and X or Y on the other".*
    - Then there's this: *"If on-street parking is part of the buffer zone and abuts the Pedestrian Clear Zone…"* How can parking be part of the buffer zone? This contradicts the statement "*The street buffer is the space between the travel or parking lanes and the bikeway or sidewalk."*
    - *"If on-street parking is part of the buffer zone and abuts the Pedestrian Clear Zone, a minimum 2' offset is required between the face of curb and the Pedestrian Clear Zone, and a minimum of 5' clear zone is required outside of the door swing zone of a parked car, to maintain accessibility."* Is this taking bicyclists into account? The 2' and 5' aren't nearly enough if the PCZ is a sidepath. If it's a sidepath, extra space is needed for cyclists in order to prevent dooring, conflicts with people loading/unloading their car, and conflicts with people standing at the parking meter.
    - The caveat *"(if sidewalk or sidepath is provided)"* stated for Country Connector should be stated for Country Road as well.
    - Where it says "buffer zone", it apparently means "Street Buffer Zone" (fix this in the entire table).
    - These concerns also apply to Fig. 8-25 on p. 201.
- The "Default Bikeways Types and Widths" row:
    - *"Default bikeway types apply to streets without master planned bikeways."* This is redundant with *"If the Bicycle Master Plan recommends something different for a specific street, that supersedes this guidance"*
    - That line also implies that streets without master-planned bikeways should usually get the default treatment. Calling a bikeway type the "default" gives it too much weight. See my comment below. The width guidelines listed in the Default Bikeway Type column of the table are helpful, however.
    - These parenthetical references are a problem: *"Dimensions do not include the street buffer (see below) or sidewalk buffer (ranges from 0'-6', see Section 6.2)."* Referring readers to the next row of the table – *"(see below)"* – refers them to the extremely simplified (and for now,

incorrect) definition of street buffers, when it should just refer them to the bike chapter. Also, *"Section 6.2"* is not the correct section.
    - *"If bikeway is adjacent to the curb, dimensions include the gutter pan*." It should say *"If bikeway is at street level and adjacent to the curb…"* to exclude the case where the SBL is at sidewalk level (on the high side of the curb).
    - These concerns also apply to Fig. 8-25 on p. 201.
- "Pedestrian Clear Zone" row
    - In the Description, state the definition first: "This is either a sidewalk or sidepath."

<u>The fundamental table problem on p. 55</u> is that it bites off more than it can chew. As a result, it oversimplifies bike considerations, yet it's already too large. I would break it into multiple tables. But some changes might help:

> <u>To nominally improve the table</u>, add an additional row for "Sidewalk Buffer", which would make it clear that there is more than one buffer in the SBL case. It would say something like "This is the buffer between the SBL and the Pedestrian Clear Zone, if an SBL is present". It would also note that if the SBL is at street-level and the street buffer is narrow, the sidewalk buffer is where to put bike docks, trash cans, etc. (If you decide SBLs go in the Street Zone, ignore this comment).
>
> <u>To further improve the table</u>, use separate rows for each major type of bikeway (sidepath, on-road, and SBL), since each has a different role in the cross section. That means two additional rows.

<u>The table in Figure 8-25 on page 201 adds no value.</u>
The table on p. 201 is in the bikeway chapter, but it's little more than an excerpt of the table on p. 55, even though the excerpt addresses more than just bikeways. The table on p. 201 should be more specific, detailed, and useful.

<u>Chapter 4 ("Sidewalk Zone") adds to the confusion</u>.
- Based on the diagram and text on p. 64, the SBL are never in the Sidewalk Zone. This is wrong based on my understanding. The "sidewalk buffer" is also never mentioned.
- On p. 63, it states, *"The sidewalk is comprised of three zones: the Street Buffer Zone, the Pedestrian Clear Zone, and the Frontage Zone."* Replace "sidewalk" with "Sidewalk Zone" in that line.
- On p. 66, the "Street Buffer Zone" is defined as the zone that *"lies between the travel lanes and either the Pedestrian Clear Zone, a sidepath, or a separated bike lane."* But a sidepath *IS* a Pedestrian Clear Zone. This is confusing.
- That same line on p. 66 also puts the "Street Buffer Zone" between the SBL and the travel lanes – thus putting the SBL squarely in the Sidewalk Zone. This seems to confirm my understanding.

<u>Trash cans, bike docks, etc. in SBL case.</u>

Street Chapter 4 should clarify that if the SBL has just a narrow street buffer, as is typical for street-level SBLs, things like trash cans and bike docks should go in the sidewalk buffer, not the street buffer.

Chapter 5 ("Street Zone")

- The text on p. 93 does not have SBLs in the "Curbside Zone". But the diagram on that page shows them there.

Figures 8-7 through 8-12 (pp. 184-186):

- It would be extremely helpful to show the main cases of bikeway treatments in 3D perspective. These 2D diagrams are more difficult to comprehend visually. Parked cars are hard to distinguish from moving ones. Bike lanes are hard to distinguish from travel lanes.
- It would be helpful to show the recommended dimensions for each bikeway and buffer. Be sure to require *at least a 3' buffer* between parking and an SBL.
- Figure 8-9, the configuration is labeled "interim", but this is often preferred over the Fig. 8-10 configuration labeled "permanent". Setting the SBL further back from the street can lead to reduced visibility of/by traffic, greater pedestrian encroachment, more frequent obstruction by drivers waiting to pull out from side streets, and greater difficulty turning or shifting into the travel lanes (by bikes). At this rate, separated bike lanes will be so distant from the roadway that they'll be little more than sidepaths, which are inappropriate in an urban area. Intersections are by far the most dangerous part of an SBL anyway.
- Listing the street types associated with each each cross-section is tying street types too closely to their default bikeway types. The master plan is full of streets that don't use the default bikeway type.
- More cross-sections should be depicted in these figures, corresponding to the most common bikeway permutations as described below. No figure even shows on-road bike lanes, despite being master-planned on several streets.

Bikeway Permutations

Factors like the position and type of bikeways result in several bikeway permutations, each of which might impose different width requirements on each cross section element. I've identified the following 14 permutations, which cover most streets. Except for the first three, make sure each permutation has its own diagram on pp. 184-186.

- Sidewalk/BUF1/travel lanes – Bikes presumed to use the travel lane*
- Sidewalk/BUF1/parking/travel lanes – Bikes presumed to use the travel lane, with parking*
- SUP/BUF1/travel lanes – SUP may require a wider buffer than a sidewalk does*
- SUP/BUF1/parking/travel lanes – SUP may require a wider buffer than a sidewalk does
- PCZ/BUF2/SBL/ BUF3n/travel lanes – 1-way/2-way SBL, narrow BUF3, no parking**
- PCZ /BUF2/SBL/ BUF3n/parking/travel lanes – 1-way/2-way SBL, narrow BUF3, with parking**
- PCZ /BUF2/SBL/BUF3w/(parking)/travel lanes – 1-way/2-way SBL, wide BUF3, with or without parking**
- Sidewalk/BUF1/CBL/(BBB)/travel lanes – Adding BBB would make it a buffered bike lane.***
- Sidewalk /BUF1/parking/(BBB)/CBL/travel lanes – Adding BBB would make it a buffered bike lane.***
- Sidewalk /BUF1/ABL/travel lanes – Advisory bike lane
- Sidewalk /BUF1/shoulder/travel lanes – Bikeable shoulder

KEY: PCZ=pedestrian clear zone (sidewalk or sidepath). SBL=separated bike lane. CBL=conventional bike lane. ABL=advisory bike lane. BUF1= buffer between PCZ and street. BUF2=buffer between PCZ and SBL. BUF3n=narrow buffer between SBL and street. BUF3w=wide buffer between SBL and street. BBB=painted buffer (of a buffered bike lane).

*These simple cases don't require their own diagrams.

**SBLs can be one-way or two-way, so each listed SBL permutation above is really 2 permutations, and each should be depicted separately. Hence there are 14 permutations in all. Also, BUF3n is typically used for street-level SBLs, while BUF3w is typically used for sidewalk-level SBLs (n=narrow, w=wide).

***To simplify "buffered bike lane" permutations, I just note the two most common ones: outside buffer *without* parking, and inside buffer *with* parking. These are painted buffers, not to be confused with SBL buffers.

Each of these permutations should have "preferred" and "required" widths for each element.

SPECIFIC COMMENTS

Default bikeway type – general considerations. The concept of a "default" bikeway for each street type is very simplistic. For any street improvement, a wide array of bikeway options must be considered and evaluated. The "default" indication could prejudice designers against using other types. For example, one-way vs. two-way SBLs are probably used with equal likelihood. Something as complex as the choice

between one-way and two-way SBLs should not influenced by one cell of a giant table. If "default" must be retained, the term must be defined and explained in the bike chapter.

Similarly, the diagrams showing the default type (pp. 184-186) could prejudice designers against 2-way separated bike lanes if they aren't shown.

Conventional bike lane door zone: The combined width of a *conventional bike lane* and adjacent parking lane must be a minimum of 14', preferably 15', so the bike lane can lie outside the car door zone. If it's a buffered bike lane, the combined width of the bike lane, parking, and buffer must meet this requirement.

SBL door zone: A minimum 3' buffer is required between a parking lane and an SBL to keep cyclists out of the "door zone". 4' is preferred. 2' is not enough.

SBLs without parking are often preferred over SBLs with parking. State this in the guide. SBLs behind parked cars are often a problem due to visibility issues, blocking by cars waiting to pull out from side streets/driveways, pedestrians walking to/from their car, more frequent encroachment by pedestrians, and difficulty for cyclists to exit the SBL mid-block. Consider moving parking to one side of the street and putting a 2-way SBL on the other side if parking must be retained.

Curb extensions and bumpouts: Installing curb extensions or bumpouts that block an existing shoulder should be done in a way that does not needlessly block the shoulder for cyclists. The solution is usually to provide a slot through the bumpout or a ramp that goes up and over the bumpout that cyclists can use. Sometimes MCDOT does this, but other times they forget. The consideration applies even if there's a parallel sidepath or SBL.

Traffic-calming median islands – Installation of small median islands to create neckdowns for drivers can result in the elimination of short segments of shoulder used by bicyclists. The solutions are not as easy as with curb extensions, but shoulder bicyclists should at least be considered in every such case, and if necessary a small shoulder should be continued through the neckdown.

Breakout gaps – Gaps in the barrier separating the SBL from the travel lanes are important for multiple reasons. Such gaps or "breakouts" are needed so cyclists can cross the street between sanctioned crossings (to turn left, for example), go around obstacles like debris or pedestrians, and shift left as needed to make conventional left turns. The easiest solution is just to make the barrier "porous" by constructing it using curbstops, planters or flex posts.

Major Highways (p. 46, etc.) – Fully grade-separated highways like the ICC are often ideal places to put such parallel trails because of the lack of at-grade crossings. Instead of implying that these highways don't need bike/ped accommodations unless noted in a master plan, stipulate that *every* new major

highway should include a shared use path (or hiker-biker trail) by default. Also emphasize that every crossing over or under the highway should include bike/ped accommodations.

Sidepath/street buffer allocation
For sidepaths, an 8' sidepath next to a 4' street buffer is preferable to a 10' sidepath next to a 2' street buffer. One exception may be if there's a wide shoulder (which acts as a sort of buffer).

Bikeway priority (p. 57) – The priority of "Bikeway" should be *high* on any master-planned bikeway.

Shoulder widths. Regarding Country Road and Country Collector widths, the guide says shoulders on these streets should be 4' and 8' wide, respectively. It says that if the shoulders are bikeways, width should be 8' or 10' wide, respectively. But all shoulders are in effect bikeways for the many riders who use them. A simple solution is to make the default shoulder width a minimum of 5', not 4', since 4' is inadequate (especially with striping imprecision, decaying edges, etc.).

In reality, for bicycling purposes, a full 8' or 10' is welcome but not needed. Onerous minimum width requirements could push designers into giving up on bikeable shoulders and just providing a shared use path instead, which on rural roads is usually the wrong choice.

Bike crossing markings (p. 138). We wholeheartedly support the dimensions specified for bike crossing markings – the "green bars". The guide stipulates 2' wide green bars separated by 2' wide gaps. This 1-to-1 ratio of gaps to bars is crucial. Wider gaps make the bars less noticeable to drivers and more difficult to pick out in the ocean of white crosswalk bars seen at some intersections. Fig. 8-6 (p. 182) demonstrates the noticeability problem: there's only a single bar between the driveway edges, and emerging drivers might not realize it's a bike crossing. I also recommended using a photo of a crossing that meets the standard.

Country Connector/Country Road accommodations (p. 42 and p. 44) – The text for *both* of these road types (Country Roads, not just Country Connectors) should indicate that the roads may be popular recreational bike routes. Also for both road types it says, *"Due to higher speed vehicle traffic, designs should provide ample separation from vehicle traffic for pedestrians and bicyclists."* But "separation" might not be the right word, as it implies separated bikeways, which are often not the best solution on these roads.

Default bikeway type for country connectors and roads.
For Country Connectors and Country Roads, the draft guide correctly states that one of the default bikeway types is the shoulder bikeway (if you're specifying defaults at all). *But some members of the public have asked that these roads only have sidepath as a default.* So consider these points to be a defense of the draft guide:

- Rural roads are a valuable amenity for recreational bicyclists from all over the county, and recreational cycling has inspired many people to use their bikes for transportation as well.

- On the other hand, the justification for separated bikeways and sidepaths is reduced, because low density reduces both the need and practicality of utilitarian biking.
- Where sidepaths may be important, these can be master planned. That includes segments of major trails and connections to MARC rail stations.
- These roads are very far from smart growth, so the cost of serving utilitarian bicyclists is difficult to justify.
- This is entirely consistent with the Bicycle Master Plan, which states, "In rural areas of the County, a network of bikeable shoulders is recommended for recreational bicyclists who prefer to ride on the road."
- Making shoulders the default bikeway type for rural roads encourages agencies like MCDOT and SHA to preserve existing shoulders on rural roads by default. Rural roads are resurfaced and restriped on a regular basis, and sometimes curb and gutter are added. Too often, the agencies have reduced shoulder width as part of such projects, intentionally or unintentionally.

Ramp crossings (p. 138). The text says grade-separated crossings should *"be a minimum of 12 feet wide (2-foot-wide buffer, 8-foot-wide sidepath, 2-foot-wide buffer) between walls and railings where the connecting bikeway is a sidepath".* Is there always a railing? Suffice it to say that providing just a two foot buffer between a sidepath and the curb is not appropriate unless there's a railing. Bicyclists could easily fall into the roadway.

Median width (p. 107) – Text states "*the minimum median width is 6 feet for all street type*s" in bold. But there are places where the median must be reduced to just a narrow strip in order to fit a bikeway in. This should be addressed in the bike section.

Sharrows (pp. 192-193) – It's unclear if these terms all refer to the same thing: "shared lane marking" (in the figure caption and text), "priority shared lane marking" (in the heading and text), and "standard shared lane marking" (in the text). Yet nowhere is the word "sharrow" used, which is the common name. Also, the minimum distance from the curb to the sharrow in case of parking isn't given, despite the note saying sharrows may be used to keep cyclists out of the door zone. This distance in case of parking should be at least 13', never 11'.

Regards,

Jack Cochrane
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Montgomery Planning Board Testimony - July 23, 2020 Hearing - Complete Streets Design Guide

My name is Peter Gray and I am testifying on behalf of the Washington Area Bicyclist Association and the 1500+ WABA members who live in Montgomery County, plus the additional thousands of other County residents who have joined in actions in support of better bicycling in the region.

WABA wants to fully endorse the priorities set out in the Complete Streets Guide, which will give developers, MCDOT and MDOT SHA a blueprint for remaking our County (and State) roads in a manner which will give greater priority to safe travel on these roads to all users, including those who travel by bike, transit and walking. This replaces the former (seemingly sole) emphasis on auto throughput and design of roads to maximize the speed of cars. By incorporating the significant elements of the County's Bicycle Master Plan, Pedestrian Master Plan and the the emerging Vision Zero Action Plan, this guide will direct planners, engineers, developers and governmental agencies to shape new development, retrofit projects and repavement of roads in a manner that will make our roads safe for all who use them. We especially urge that the Guide and the aforementioned Master Plans be applied to every street that undergoes repaving.

We commend the MCDOT and Planning Department authors for putting so much emphasis on lowering vehicles speeds through intentional design. Untangling posted speed (what is signed) from a target speed (what is right for the context) centers the discussion on the appropriate speed for a street and the design features that will reinforce it. This approach is consistent with recent guidance from the NTSB to replace the 85th percentile rule for setting speed limits with guidelines proven to improve safety. To that end, we encourage the authors to review the most recent publication from the National Association of City Transportation Officials called "City Limits" which provides invaluable guidance on the topic. This guide should be consistent with that guidance for target speeds in urban areas.

More specifically, we make the following additional comments:

P.55 - we urge the setting of sidepaths as the default for County Connectors and County Roads instead of bikeable shoulders which are far less safe for cyclists and pedestrians.

P. 56 - the guidance for Street Buffer, Bikeways and Pedestrian Clear Zone that for breezeways, the Bikeways priority is high, is directly on point and should be followed at all times.

P. 57 - the priority for Bikeways on Downtown Boulevards, Downtown Streets, Boulevards and Town Center Streets should be changed to High, instead of Medium, equal to that of Pedestrian Clear Zones. An example of this is the urgent need for a protected bike lane on Fenton Street in downtown Silver Spring.

P.131 - Fig 6-15 - we applaud the requirements for Protected Intersections, Bike Boxes and Two-Stage Queue Boxes on all types of roads!

P.136 - we also endorse the Guide's note that "Mixing Zones...are not recommended for interim separated bike lanes.." With many examples spread throughout the Washington region, we know that these do not adequately mitigate the risks. Dedicated bike signals are far preferable.

P. 196 - in the comment relating to roads that have a speed limit of 35 mph or higher, we urge that the guidance note that separation of more than 5 feet is required, as opposed to desirable.

In conclusion, we urge the Planning Board to approve the Complete Streets Design Guide, taking into account the specific comments above. Thank you.

Peter Gray
Vice-President, WABA Board of Directors

Hi,

I'm writing to comment on this Guide. It was a bit padded in content and so I can't say that I read every word, but I appreciate the intent behind it.

I would beseech you to recognize that just because many people drive somewhere now, does not mean things cannot be changed by forward-thinking leadership. Look at cities in Europe and Canada and how much things have changed in a short period of time.

We are headed toward a climate catastrophe, with which the pandemic pales in its impact. I'm embarrassed at the width and speed of the roads in this county, that presumably are financed by my taxes. We need to be thinking expansively about how to promote alternatives to driving (and frankly either tolling roads and/or having gas be a price that reflects its impacts.

I intentionally do not own a car for reasons of principle. Now that public transportation is largely off limits, due to the pandemic, I can't even access much of Montgomery County because bicycling there is not safe. One example: would love to check out places in Wheaton, but while Sligo is a lovely ride, I do not feel ok with bicycling in a narrow and crowded trail for 5 miles. Drivers don't have these types of considerations. We need to stop subsidizing driving, and we certainly need to stop putting the needs and speeds of drivers first.

Please - - make sure that people who are involved in this effort ditch automobiles for significant portions of time. And please consider some of the ideas in this article.

https://usa.streetsblog.org/2020/02/25/how-to-make-every-city-walkable-in-three-infographics/

Three Simple Ways to Make Cities More Walkable – Streetsblog USA

Germany doesn't have a single goal to improve the pedestrian experience on its streets — it has seven.. That's right: Germany not only has a comprehensive National Walking Plan — something American street-safety advocates only dream of — but its transportation leaders are holding themselves accountable to seven distinct benchmarks for measuring how their policies affect the safety ...

usa.streetsblog.org

Thanks for reading my comments.

Lori Bowes, Takoma Park, MD

Three Simple Ways to Make Cities More Walkable

America doesn't need an ambitious pedestrian-safety target. We need seven of them.

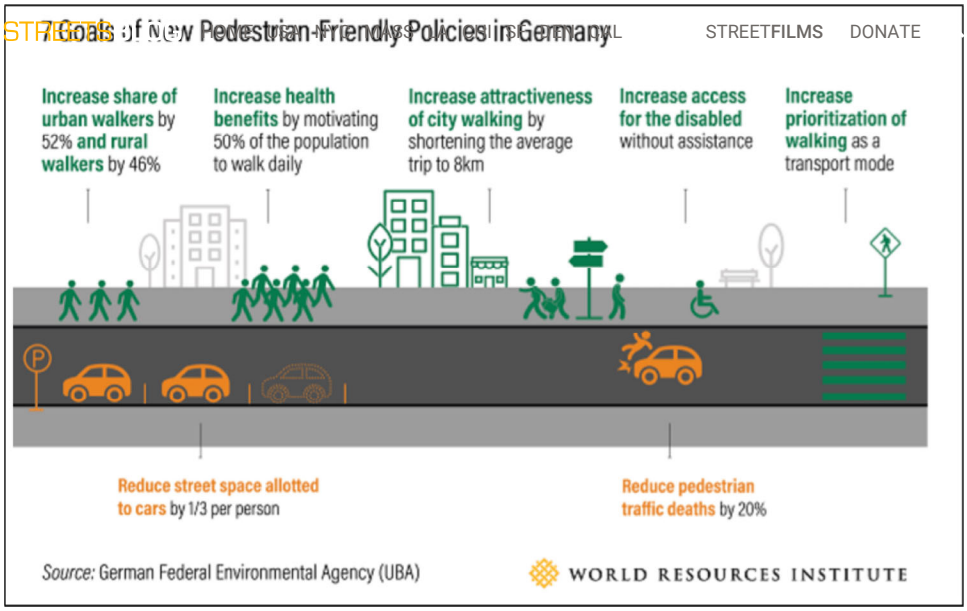
By Kea Wilson | Feb 25, 2020 | 10 COMMENTS

What not to do. Photo: Don Kostelec.

Germany doesn't have a single goal to improve the pedestrian experience on its streets — it has *seven.*

That's right: Germany not only *has* a comprehensive National Walking Plan — something American street-safety advocates only dream of — but its transportation leaders are holding themselves accountable to seven distinct benchmarks for measuring how their policies affect the safety and comfort of people on foot.

Seriously, just check out this infographic, which spells out exactly how walkable Germans want their cities to become by 2030:



Source: World Resources Institute Ross Center for Sustainable Cities

It's a shocking contrast to the American approach to pedestrian policy and goal setting. The Federal Highway Administration doesn't even *have* national pedestrian-fatality-reduction goals; its last safety plan focuses, instead, on such non-quantifiable targets as "Motivate drivers to look for and stop for pedestrians" and the maddening "motivate pedestrians to use crosswalks and designated-crossing locations."

That's perfectly in keeping with America's broader approach to roadway safety. Last week, U.S. delegates only reluctantly agreed to an international pledge to reduce total roadway fatalities by 50 percent in 10 years, giving the excuse that "not all" nations had agreed to the target before the pledge was drafted. (Read: They didn't think halving road deaths was realistic, even as city after city eliminates them.)

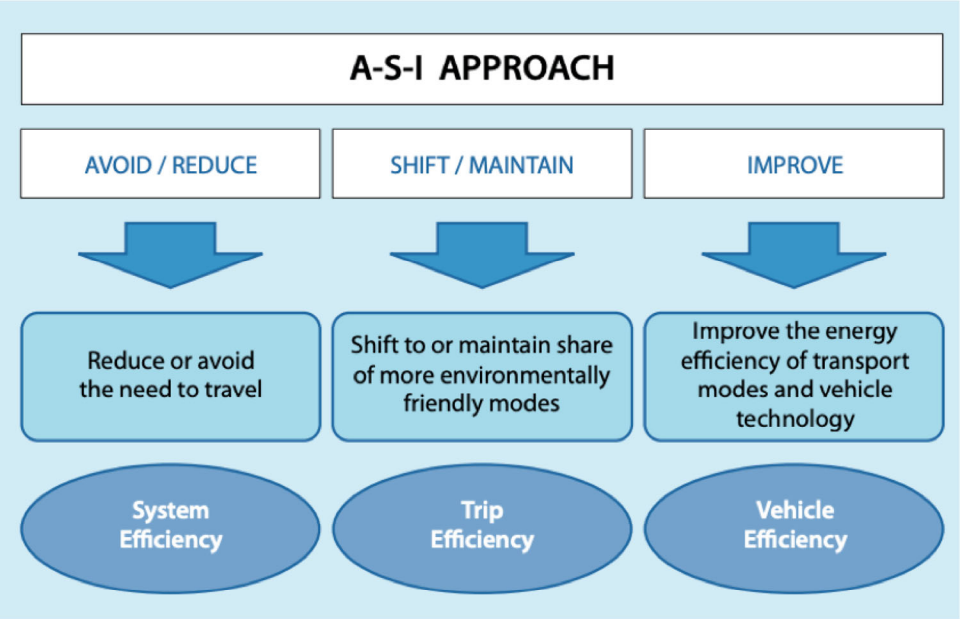
Germany signed the 50 percent pledge, which makes its pedestrian–only safety goals even more impressive. Deutschlanders are pledging to reduce non-driver/cyclist fatalities by at least 20 percent by 2030; they're also requiring states to set aggressive cycling-fatality-reduction targets as part of a National Cycling Plan.

But the push doesn't just stop at safety. The Germans also aim to make walking more attractive and convenient by shortening the average pedestrian trip to under 5 miles, increasing accessibility for disabled people, and reducing car use.

That's a night-and-day difference from U.S. pedestrian policies, which focus almost exclusively on increasing safety through modest gains in pedestrian infrastructure — and don't address the question of whether walking is comfortable and attractive.

But as a decade of rising American pedestrian-fatality stats has shown, adding meager amounts of pedestrian infrastructure to otherwise completely car-focused streetscapes in hopes of saving lives doesn't even *work.* "This supply-side oriented approach has not delivered the expected benefits [in the realm of pedestrian safety,]" German consultancy group GIZ said in a report about its country's pedestrian policy. "Induced traffic has been created and roads continue to exhibit unacceptable levels of congestion, greenhouse-gas emissions and other externalities. For this reason, the traditional approach is nowadays regarded as obsolete."

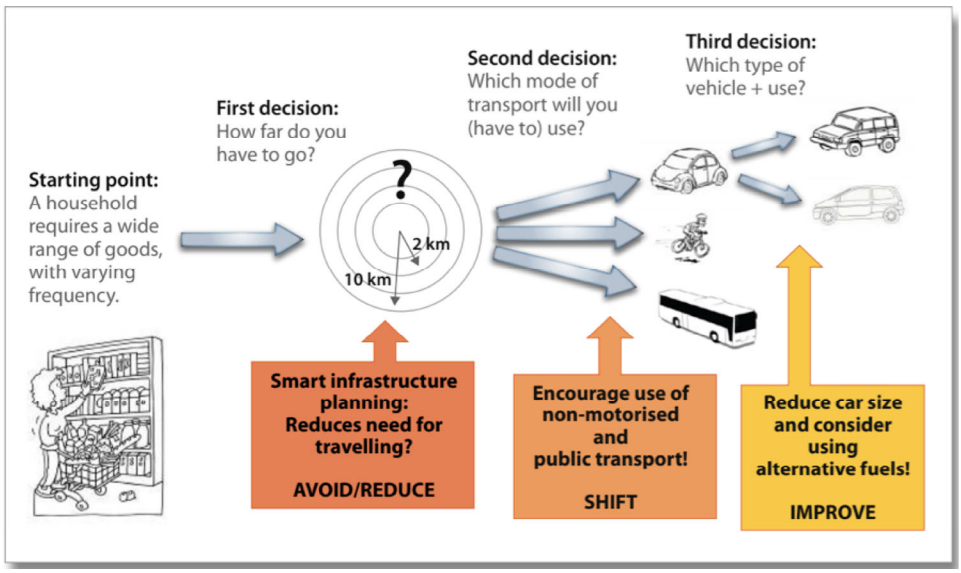
That's a very German way of saying that the traditional — read: American — style of cars-first, pedestrians-later transportation planning *totally sucks.* There's a better way, and it's called the Avoid, Shift, Improve model, or ASI.



Source: supt.org

Rather than simply focusing on pedestrian-friendly infrastructure, an ASI approach demands that cities, states and even nations think more holistically about saving lives on their streets. The "avoid" column — which refers to policies designed to reduce the necessity of long trips usually taken by car — is especially under-discussed in American transportation policy, because, of course, it falls outside the realm of traditional transportation planning. The ASI model insists, however, that leaders think broadly about housing, commercial development, and creating complete neighborhoods in which people don't *need* to drive to the grocery store or their kids' school, because essential services are right next door.

Here's another look at the ASI approach that even more concisely illustrates why Americans need to stop treating pedestrian safety as just an infrastructure problem, and start thinking bigger.



Source: supt.org

It's refreshing to see a transportation plan that doesn't start with cars, and instead positions private motor vehicles exactly where they should be in our road hierarchy: as the mode of last resort. If America wants to do better by its pedestrians, we should open up our minds, set *many* ambitious goals to make sustainable transportation better, and — just maybe — start thinking like the Germans.

Filed Under: Germany, pedestrian deaths, Pedestrian Infrastructure, Pedestrian safety, pedestrians, Promoted

MOST RECENT

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Tuesday's Headlines

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Vooch • 6 months ago • edited

The walk mode share of many cities is amazing -

Barcelona - 32%
London - 24%
Munich - 28%
Tokyo -23%

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These are big sprawling cities - if they can achieve such high walk mode shares, then surely we can also.

40% of all trips in the US are 3 miles of less. Plenty of these trips could be accomplished without a motor vehicle.

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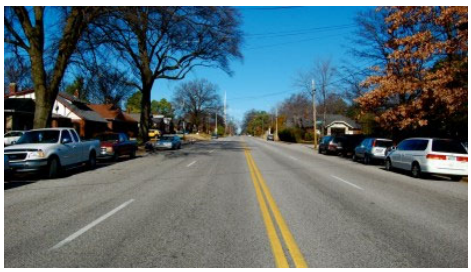
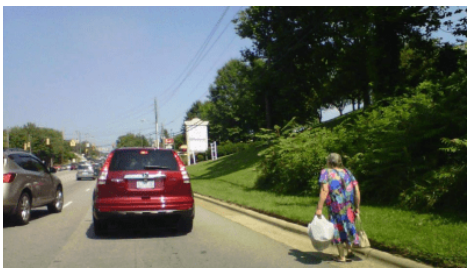


Memphis is the Most Dangerous Place to Walk

By Aaron Short | Oct 29, 2019

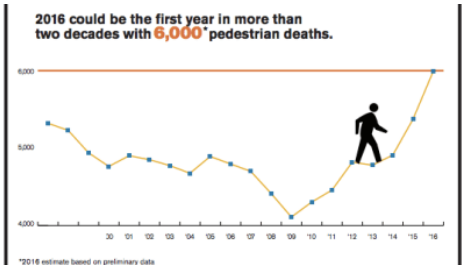
But progress on pedestrian safety is moving slowly (unlike Bluff City drivers!).



Experts: Feds Aren't Fixing Pedestrian Safety Crisis

By Angie Schmitt | Oct 12, 2018

Federal officials are failing to protect pedestrians — and, in fact, err on the side of drivers and even blame walkers for a pedestrian death toll has increased 50 percent in just eight years, advocates say.



The Traffic Safety Establishment Needs to Take More Responsibility for Soaring Pedestrian Deaths

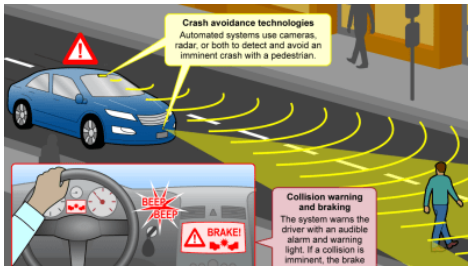
By Angie Schmitt | Apr 6, 2017

America's traffic safety establishment has long been focused on "behavioral" explanations for traffic deaths -- things like seatbelt usage and drunk driving. By ignoring the role of the high-speed, car-centric transportation systems they've created, they don't have to face their own culpability.

FHWA's New Goal: Eliminating Pedestrian and Cyclist Deaths in America

By Angie Schmitt | Sep 15, 2016

The Federal Highway Administration wants to eliminate pedestrian and cyclist fatalities "in the next 20 to 30 years." In a new strategic plan [PDF], the agency calls for reducing serious injuries and deaths 80 percent in the next 15 years, which would be an intermediate goal on the way to zero. FHWA also calls for boosting the share of [...]



Vehicle Safety Standards Don't Protect Pedestrians

By Kea Wilson | Apr 28, 2020

Federal regulators have failed to consider safety of pedestrians in their vehicle safety standards for far too long— and now the Government Accountability Office is calling them out.

Nevada, Miami, and St. Louis Take Steps Backward on Pedestrian Policy

By Angie Schmitt | Mar 5, 2013

From around the Streetsblog Network today, here are a few developments affecting the walking environment in cities from Miami to Las Vegas. The news, unfortunately, is mostly bad. Nevada Cracks Down on Texting and Walking: Nevada's best known street — the Las Vegas strip — might be the ultimate case study in how road design [...]

Montgomery County Complete Streets Design Guideline v1.0 Summary of Submitted Public Comments

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
1	7/24/2020	Darnestown			Country Road Speeds seem to High or without enough variabiliy	5	Speed Management
2	7/25/2020	Project Team			We left out secondary streets – lower end of the street classifications don't fit. I.e. the difference between a yield street and a neighborhood street are distinct enough. The use of medium vs moderate.	1	Typologies
3	7/26/2020	Project Team			Disability community concerns about floating bus stops	3	Bikeways
4	7/27/2020	Darnestown			Darnestown didn't like the Country Connector graphic – it shows a 4 lane road	1	Typologies
5	7/30/2020	Rustic Roads Advisory Committee			We would like to recommend additional language to state that roads are added and removed from the Rustic Roads program through local master plan amendments as well as through amendments to the Rustic Roads Functional Master Plan.	1	Typologies
6	7/30/2020	Rustic Roads Advisory Committee			Chapter 9 on Speed Management addresses target speeds, and the Committee would welcome a review of whether lower target speeds in some areas on some rustic roads could help reduce crashes and crash severity. We support the use of "Neckdowns" as tools for narrowing the travelway to a single lane, encouraging motorists to yield to oncoming traffic before proceeding, and this tool is used to provide for safe and slow passage over our one-lane bridges on rustic roads.	5	Speed Management
7		Alison Gillespie, Chair of MCCPTA Safe Routes to School			We'd like to request that schools – and more specifically the roads near schools – be a part of this guide. Specifically, we request that "School Roads" (or similar) be added as a "Street Type" in Chapter 2. This would be consistent with calling out the special land use and transportation context around each school building and would provide guidance for how to best design roadways within these environments. It would spur these conversations early in the design process and serve as a guide to develop safe and context appropriate roadways to improve safety for all of our students.	1	Typologies
8		Alison Gillespie, Chair of MCCPTA Safe Routes to School			We'd also like to ask that you design school streets/school zones to be uniform and consistent across the county and that, like for other street types, you consider: speed, sidewalk requirements, bike routes, ADA accessibility, safe pick up and drop off facilities that consider how school buses and cars travelling through nearby streets will need to interact at high volume times. This includes monring drop-off and afternoon pick-ups but also large events such as sporting events and graduations	1	Typologies

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9		Alison Gillespie, Chair of MCCPTA Safe Routes to School			Those of us on the Safe Routes to School Committee also would like to be included in any future communications about this guide so that we can more effectively partner with you.	1	Public Process
10		Kristy Daphnis, Chair PBTSAC			We would like to also underscore the importance of continuing to take ADA accessibility seriously, and urge you to continue regular conversations with disability advocacy groups to ensure there are not unintentional accessibility barriers as complete streets are designed and implemented.	1	ADA Accessibility
11		Kristy Daphnis, Chair PBTSAC			One thing we do not see much of is a "lean in" to possible technological improvements that may come in the next several years - including smart traffic systems and vehicle to infrastructure communications. Admittedly, that may be out of scope for this document, but it is something that should be considered, on whether the infrastructure and curbside management will need to accommodate for these types of things - including automated delivery vehicles and other technologies that may need to use precious space. At the least, the document should leave open the possibility for additional design vehicle types to be easily added as addendum to the Guide in the future, if necessary.	3	Street Zone
12		Kristy Daphnis, Chair PBTSAC			We ask that you consider further delineating the "roles of streets" section 1.2 of the document, breaking "Travel" into "Recreation" and "Transportation." This would be useful in helping to apply an equity lens to decisions, because it would help planners and others further contextualize the need for prioritization of certain streets and corridors that are often used for transportation to access necessities of daily living (commuting to work, going to school, accessing the grocery store and other necessary amenities in areas where residents aren't likely to own cars). "Recreation" uses would best be paired with "Social Engagement," versus "Travel."	1	Vision
13		Kristy Daphnis, Chair PBTSAC			We ask that you consider adding "School Zone Street" (or similar) as a Street Type in Chapter 2, and throughout. This would encourage early design process conversations (versus waiting until a mandatory referral), and would serve as a guide to developing safe and context appropriate roadways around schools to improve safety for all of our Montgomery County students and their families.	1	Typologies
14		Kristy Daphnis, Chair PBTSAC			We ask that you consider further guidance on information specific to trail crossings, whether it be in Chapter 2, 6, or another appropriate point within the document; and, that you consider providing more information on how to implement safety countermeasures in areas where the land use may not exactly match with the street type and design.	3	Bikeways

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15		Kristy Daphnis, Chair PBTSAC			You've provided the legal definition of a crosswalk, which is helpful. Could you also provide a few visual depictions of legal crosswalks?	4	Intersections
16		Kristy Daphnis, Chair PBTSAC			Please fully consider the impact of delivery vehicles, taxis, rideshare, and other similar vehicles - and build in ways to protect the space and use by other road users. Also, consider whether curbside management or infrastructure may need to accommodate different types of new technology - leaving open the possibility to easily add additional design vehicle types in the future.	3	Street Zone
17		Kristy Daphnis, Chair PBTSAC			Please consider further public and stakeholder engagement before making final decisions on the content and prioritization in Figures 3-3, and 3-4. Please also consider reducing the minimum crossing distances across the board, or, define clear thresholds for showing necessity, and make these thresholds relatively low.	4	Prioritization
18		Kristy Daphnis, Chair PBTSAC			we are encouraged to see the principle of "20 is Plenty" carried into several of the street types, including neighborhood streets. In general, we support the lowering of speed limits (and designing streets for lower speed), as lower speeds are shown to improve safety outcomes - particularly in pedestrian and bicycle crashes.	5	Speed Management
19		Lori Bowes			I would beseech you to recognize that just because many people drive somewhere now, does not mean things cannot be changed by forward-thinking leadership. Look at cities in Europe and Canada and how much things have changed in a short period of time.	1	Vision
20		Lori Bowes			We are headed toward a climate catastrophe, with which the pandemic pales in its impact. I'm embarrassed at the width and speed of the roads in this county, that presumably are financed by my taxes. We need to be thinking expansively about how to promote alternatives to driving (and frankly either tolling roads and/or having gas be a price that reflects its impacts.	1	Vision
21		Lori Bowes			We need to stop subsidizing driving, and we certainly need to stop putting the needs and speeds of drivers first.	1	Vision
23		Lori Bowes			1. Increase Share of Urban Walkers by 52% and Rural walkers by 46%	1	Vision
24		Lori Bowes			2. Increase health benefits by motivating 50% of the population to walk daily	1	Vision
25		Lori Bowes			3. Increase attractiveness of city walking by shortening the average trip to 8km.	1	Vision
26		Lori Bowes			4. Increase access for the disabled	1	Vision

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27		Lori Bowes			5. Increase prioritization of walking as a transport mode.	1	Vision
28		Lori Bowes			6. Reduce street space alloted to cars by 1/3 per person	1	Vision
29		Lori Bowes			7. Reduce pedestrian traffic deaths by 20%	1	Vision
30		Melvin Tull			Figure 4.16 misidentifies a Bethesda location as Silver Spring	2	Sidewalk Zone
31		Melvin Tull			Before you call for raised crosswalks/speedtables at downtown street intersections I ask you to look outside your office building at the broken, heaved, unmaintained 1980s brick sidewalk and consider again whether the proposed infrastructure can survive an absence of the required maintenance, repair and replacement. That sidewalk is the basic pedestrian environment. When the sidewalk provides such an uneven and unsafe example of unreliable maintenance can Complete Streets move forward without including a mechanism for the county to do the maintenance?	5	Implementation
32		Melvin Tull			One thing missing in the prescription for a sidewalk is consideration of signage for the businesses and shops that line the sidewalk behind the trees and bike lanes along commercial area downtown streets and boulevards. I believe part of the vitality of a commercial area, particularly a downtown, involves being able to tell you are in a commercial area, to see the shops, to identify them. If the only place Complete Streets will allow a shopkeepers sign to be seen is at a big box plaza, where the big box gets the visible signage, you should think it through again.	2	Sidewalk Zone
33		Melvin Tull			Complete Streets is a compilation of Engineering Design. Engineering is one of the 3 E's for road safety. Enforcement is another, easily dumped on the police. The third, often overlooked is Education. Education should be addressed here because Complete Streets embarks on a wild ride of new mixes of features. Just as the sudden appearance of painted stripes and green areas of new bikeways were a dangerous mystery to pedestrians, drivers, bus operators, and bike riders, Complete Streets proposed to create a confusing new mix that will not be continuous from block to block, or even within a block. Education needs to be highlighted and stressed as any part of Complete Streets is implemented. Not just a news release, a web page, or a pamphlet placed in a rack at the Transit Center.	1	Vision

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34		Melvin Tull			Next a word about commercial downtown areas. Not all shops have an alley behind, and many do not go through to the alley, so please don't rely on a street plan that does not recognize a need for deliveries and trash/garbage pick-up from the front, across the sidewalk, through the trees, across the bike lane, etc. Please think it through, particularly the garbage storage and collection process.	3	Street Zone
35		Melvin Tull			Last, but not least, the future fast approaches and Complete Streets should be ready for many possibilities. I think here of 5G transmission and the need for much larger poles with antennas in the sidewalk environment. Have we been told yet how the 5G wavelength is affected by trees?	1	Vision
36		Melvin Tull			As you and I continue to contemplate the complexities of Complete Streets lets work together to figure out where to pile snow	5	Implementation
37		Melvin Tull			whether economic conditions suggest the time has come for a sidewalk Homeless Tent Zone	1	Vision
38		Melvin Tull			and whether Montgomery County climate change efforts should include painting road surfaces heat reflective white	4	Green Streets
39		Jane Lyons, Center for Smart Growth	55		Page 55: We'd like it to be clear that a sidepath is always preferable to bikeable shoulders.	3	Bikeways
40		Jane Lyons, Center for Smart Growth	57		Page 57: We recommend that bikeways be listed as a high priority for downtown boulevards, downtown streets, town center boulevards, and town center streets.	4	Prioritization
41		Jane Lyons, Center for Smart Growth	82		Page 82: Bus shelters, in addition to BRT stations, should consider opportunities to provide additional passenger amenities such as seating, local area information, wayfinding, and real time traveler information.	3	Transit
42		Jane Lyons, Center for Smart Growth	88		Page 88: We urge the county to update its policy for snow events. Especially in downtowns and town centers, the county – not the building owners – should be responsible for clearing snow on sidewalks, sidewalk ramps, and sidewalk-level bicycle facilities.	5	Implementation
43		Jane Lyons, Center for Smart Growth	232		Page 232: Public engagement should also include on-the-street direct outreach strategies, as well as strongly encourage paid community focus/advisory groups to ensure diverse input for major decisions.	1	Public Process

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44		Jane Lyons, Center for Smart Growth			we ask that the design guide be open to amendment upon the completion of the Pedestrian Master Plan and the Vision Zero Action Plan.	1	Vision
45		David Helms			Complete Streets Design Guide (CSDG) does not provide adequate description of how these various treatments will function as a system (network) “ensuring that the transportation network as a whole provides safe and efficient access for all roadway users and only provides designated spaces for each mode when needed.” (Ref: p.2 Complete Streets definition)	1	Typologies
46		David Helms			The term “Speed Management” and “Target Speed” should be removed and replaced with “Safe Speed” to emphasize prioritization of all road users based on health outcomes.	5	Speed Management
47		David Helms	112		Section 5.7 Network Connectivity (p.112) is totally inadequate in providing guidance on achieving Complete Streets as a system. This section should be re-written based on the following: Thrive 2050 Complete Communities and Safe and Efficient Travel goals and policies.	1	Typologies
48		David Helms	112		Transit/Travel circulation systems that should be specifically addressed as Complete Street Network Connectivity "systems: 1) Neighborhood to transit, city and town complete street networks	1	Typologies
49		David Helms	112		a) Bicycle ride shed 2.0 miles	1	Typologies
50		David Helms	112		b) Walk sheds 3.5 ft/sec = 0.6 mile	1	Typologies
51		David Helms	112		2) Home to school networks	1	Typologies
52		David Helms	112		a). Safe Routes to Schools	1	Typologies
53		David Helms	112		3) Neighborhood to Bus Stops Networks	1	Typologies
54		David Helms	112		4) Long Range (>3 Miles) bicycle commuter networks	1	Typologies

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55		David Helms	203		Sections 3.2 Street Design Parameters (p.54) and Speed Management (p.203) should be re-written to incorporate NATCO “Safe Speed Approach”.	5	Speed Management
56		David Helms	203		Setting default speed limits on many streets at once (such as 25 mph on all major streets and 20 mph on all minor streets),	5	Speed Management
57		David Helms	203		Designating slow zones in sensitive areas, and	5	Speed Management
58		David Helms	203		Setting corridor speed limits on high priority major streets, using a safe speed study, which uses conflict density and activity level to set context-appropriate speed limits.	5	Speed Management
59		David Helms			The CSDG should not adopt current Maryland Transportation statute minimum speed limits by street type if that speed does not provide adequate protection for the likely road users. The CSDG should state what the Safe Speed should be using best available science, and if the Safe Speed is in variance with state law, footnote that.	5	Speed Management
60		David Helms			Amend the State Transportation Statute	5	Speed Management
61		David Helms			The CSDG should incorporate National Safety Council “Safe System Approach”	1	Vision
62		David Helms			Neighborhood Yield Streets Safe Speed (Target Speed) should be a range, 15 mph to 20 mph, based on level of pedestrian demand, traffic, and sightline/obstruction visibility.	5	Speed Management
63		David Helms			Many “Neighborhood Yield Streets” have NO sidewalks and likely never will. Therefore, the predominant model of travel for pedestrians will be in the street. This inaccurate assumption on the likelihood of sidewalks (and potentially Transportation Statute minimum speed limits) force the “target speed” for “Neighborhood Yield Streets” to be 20 mph (Fig 3.2 and Fig 9.2). Many jurisdictions across the US and several in Maryland (Baltimore City and Calvert County) legally allow a minimum speed limit of 15 mph.	1	Typologies
64		Peter Gray, WABA	120		We especially urge that the Guide and the aforementioned Master Plans be applied to every street that undergoes repaving.	5	Implementation

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65		Peter Gray, WABA	203		We encourage the authors to review the most recent publication from the National Association of City Transportation Officials called City Limits which provides invaluable guidance on the topic. This guide should be consistent with that guidance for target speeds in urban areas.	5	Speed Management
66		Peter Gray, WABA	55		P.55 - we urge the setting of sidepaths as the default for County Connectors and Country Roads instead of bikeable shoulders which are far less afe for cyclists and pedestrians.	2	Sidewalk Zone
67		Peter Gray, WABA	56		p. 56, the guidance for Street Buffer, Bikeways and Pedestrian Clear Zone that for breezeways, the Bikeway priority is high, is directly on point and should be followed at all times.	4	Prioritization
68		Peter Gray, WABA	57		P57 the priority for Bikeways on Downtown Boulevards, Downtown Streets, Boulevards and Town Center Streets should be changed to High, instead of Medium, equal to that of Pedestrian Clear Zones. An example of this is the urgent need for a protected bike lane on Fenton Street in downtown Silver Spring.	4	Prioritization
69		Peter Gray, WABA	131	Figure 6-15	P. 131 - Figure 6-15 - we applaud the requirements for Protected intersections, bike boxes and two-stage queue boxes on all types of roads.	4	Intersections
70		Peter Gray, WABA	136		P. 136 - we also endorse the guide's note that "mixing zones are not recommended for interim separated bike lanes.." With many examples spread through the Washington region, we know that these do not adequately mitigate the risks. Dedicated bike signals are far preferable.	4	Intersections
71		Peter Gray, WABA	196		P196 - in the comment relating to roads that have a speed limit of 35 mph or higher, we urge that the guidance note that separation of more than 5 feet is required, as opposed to desirable.	3	Bikeways
72		Charles Crawford, Past President, Capital Area Guide Dog Users, Inc.			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.	3	Bikeways

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73		Charles Crawford, Past President, Capital Area Guide Dog Users, Inc.			The Capital Area Guide Dog Users, Inc. 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.	3	Bikeways
74		Charles Crawford, Past President, Capital Area Guide Dog Users, Inc.			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	Bikeways
75		Charles Crawford, Past President, Capital Area Guide Dog Users, Inc.			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.	1	Vision
76		Charles Crawford, Past President, Capital Area Guide Dog Users, Inc.			I ask that you work with the County and our community to successfully design an 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.	3	Bikeways
77		Dan Wilhelm, GCCA President			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.	1	Typologies
78		Dan Wilhelm, GCCA President			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.	1	Typologies

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79		Dan Wilhelm, GCCA President	21		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.	1	Coordination
80		Dan Wilhelm, GCCA President	37-39		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).	1	Typologies
81		Dan Wilhelm, GCCA President	7		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.	1	Vision
82		Dan Wilhelm, GCCA President	54-55		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.	3	Street Zone
83		Dan Wilhelm, GCCA President	132		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.	4	Intersections
84		Dan Wilhelm, GCCA President		Section 9.2	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.	5	Speed Management

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85		Dan Wilhelm, GCCA President	141	Section 6.12	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.	3	Transit
86		Dan Wilhelm, GCCA President	141	Section 6.12	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.)	3	Transit
87		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities			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.	1	Vision
88		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	8		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.	1	Vision
89		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	142-143		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	3	Bikeways
90		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	180-186		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	Bikeways

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91		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	207		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.	2	Sidewalk Zone
92		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	101		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.	3	Street Zone
93		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities			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.	3	Street Zone
94		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities			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.	3	Bus Improvements
95		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	232-236		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.	5	Implementation
96		Seth Morgan, Chair, Patricia Gallalee - Vice Chair - Commisions on People With Disabilities	232		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.	5	Implementation
97		Scott Plumer, Darnestown Civic Association Roads Task Force	232-236		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.	5	Implementation

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98		Scott Plumer, Darnestown Civic Association Roads Task Force			Safer roads need to be a higher priority than throughput. Engineering and public policy measures related to capacity must be tempered with risk assessment.	1	Vision
99		Scott Plumer, Darnestown Civic Association Roads Task Force			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.	1	Typologies
100		Scott Plumer, Darnestown Civic Association Roads Task Force	43		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.	1	Typologies
101		Scott Plumer, Darnestown Civic Association Roads Task Force	45		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.	1	Typologies
102		Scott Plumer, Darnestown Civic Association Roads Task Force	43		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.	1	Typologies
103		Scott Plumer, Darnestown Civic Association Roads Task Force	57	Figure 3-3	"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.	5	Speed Management

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
104		Scott Plumer, Darnestown Civic Association Roads Task Force	206-225		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.	5	Speed Management
105		Scott Plumer, Darnestown Civic Association Roads Task Force	220-225	Chapter 9	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.	5	Speed Management
106		Scott Plumer, Darnestown Civic Association Roads Task Force			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.	1	Typologies
107		Scott Plumer, Darnestown Civic Association Roads Task Force			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.	1	Typologies
108		Scott Plumer, Darnestown Civic Association Roads Task Force	218-225	Section 9.4	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.	5	Speed Management
109		Scott Plumer, Darnestown Civic Association Roads Task Force	218	Section 9.4	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.	5	Speed Management

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
110		Scott Plumer, Darnestown Civic Association Roads Task Force	209	Figure 9-3	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.	5	Speed Management
111		Scott Plumer, Darnestown Civic Association Roads Task Force	236		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".	5	Implementation
112		Scott Plumer, Darnestown Civic Association Roads Task Force			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.	1	Typologies
113		Scott Plumer, Darnestown Civic Association Roads Task Force			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.	1	Vision
114		Scott Plumer, Darnestown Civic Association Roads Task Force			Speedy is Greedy - 20 is plenty ..... for neighborhoods -35 to survive and thrive ..... everywhere else (except highways)	5	Speed Management
115		Gil Chlewicki			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.	1	Vision
116		Gil Chlewicki	9	Figure 1-2	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.	1	Vision

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
117		Gil Chlewicki			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.	1	Vision
118		Gil Chlewicki	23-47	Section 2.2	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).	1	Typologies
119		Gil Chlewicki	54-55	Section 3.2	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.	1	Typologies
120		Gil Chlewicki	54-55	Section 3.2	•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.	5	Speed Management
121		Gil Chlewicki	54-55	Section 3.2	•Max # of Vehicle Thru Lanes - Context may create different answers here.	3	Street Zone
122		Gil Chlewicki	54-55	Section 3.2	•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.	4	Intersections
123		Gil Chlewicki	54-55	Section 3.2	•Max Spacing between signals - Again will be context based. Values are mostly unrealistic.	4	Intersections
124		Gil Chlewicki	54-55	Section 3.2	•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.	3	Street Zone

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
125		Gil Chlewicki	54-55	Section 3.2	•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.	3	Street Zone
126		Gil Chlewicki	54-55	Section 3.2	•Inside Travel Lane - A 10' max width is highly inappropriate when speeds are greater than 25 mph and creates significant safety concerns for motorists.	3	Street Zone
127		Gil Chlewicki	95-97	Section 5.3	•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.	3	Street Zone
128		Gil Chlewicki	66-73	Section 4.3	•Street Buffers - Not always feasible and/or needed depending on the context.	2	Sidewalk Zone
129		Gil Chlewicki	74	Section 4.4	•Pedestrian Clear Zone - Consider renaming to Walkway. Clear Zone has a safety connotation and is confusing to most planners and engineers.	2	Sidewalk Zone
130		Gil Chlewicki	78	Section 4.6	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.	2	Sidewalk Zone
131		Gil Chlewicki	79-83	Section 4.7	Section 4.7 - BRT Stations - Don't "date" the document by stating the 1st BRT is under construction.	2	Sidewalk Zone
132		Gil Chlewicki	84	Section 4.8	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.	2	Sidewalk Zone
133		Gil Chlewicki	94-107	Chapter 5	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.	3	Street Zone
134		Gil Chlewicki	95-102	Section 5.3	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.	3	Transit

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
135		Gil Chlewicki	103-104	Section 5.4	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.	3	Street Zone
136		Gil Chlewicki	103		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.	3	Street Zone
137		Gil Chlewicki	103		It is not always true that TWLTLs increase crash risk. Again it depends on the context. For example, a road diet that convertis 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.	1	Vision
138		Gil Chlewicki	107	Section 5.5	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.	3	Street Zone
139		Gil Chlewicki	118-157	Chapter 6	Chapter 6 - Again, the focus here is too much on urban environments and not enough on suburban and rural contexts.	4	Intersections
140		Gil Chlewicki	118	Section 6.1	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.	4	Intersections
141		Gil Chlewicki	121-127	Sections 6.3-6.5	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.	4	Intersections
142		Gil Chlewicki	128-129	Section 6.6	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.	4	Intersections

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
143		Gil Chlewicki	130	Section 6.7	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.	4	Intersections
144		Gil Chlewicki	131	Section 6.8	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.	4	Intersections
145		Gil Chlewicki	132-134	Section 6.9	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.	4	Intersections
146		Gil Chlewicki	134	6.09	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 cyclsits. 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.	4	Intersections
147		Gil Chlewicki	118-157	6	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.	4	Intersections

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
148		Gil Chlewicki	135	Section 6.10	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.	4	Intersections
149		Gil Chlewicki	136	6.11	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.	4	Intersections
150		Gil Chlewicki	137	6.11	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.	4	Intersections
151		Gil Chlewicki	137	6.11	Bike Boxes can be problematic in suburban and rural contexts to vehicle safety and operations	4	Intersections
152		Gil Chlewicki	138-139	6.11	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.	3	Bikeways
153		Gil Chlewicki	139	6.11	For Traffic Signals and Bicycles, change to the minimum yellow and red clearance interval.	4	Intersections
154		Gil Chlewicki	162-173	7	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.	4	Green Streets
155		Gil Chlewicki	204-207	9	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.	5	Speed Management

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
156		Gil Chlewicki	206-207	9.2	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.	5	Speed Management
157		Gil Chlewicki	208-209	9.3	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.	5	Speed Management
158		Gil Chlewicki	210-211	9.3	•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	5	Speed Management
159		Gil Chlewicki	211	9.3	•Elimination of turn lanes outside of slow-speed urban contexts can significantly increase vehicular crashes.	4	Intersections
160		Gil Chlewicki	211	9.3	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.	5	Speed Management
161		Gil Chlewicki	215	9.3	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.	5	Speed Management
162		Gil Chlewicki			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.	5	Speed Management
163		Gil Chlewicki	217	9.3	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.	5	Speed Management

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
164		Gil Chlewicki	220	9.4	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.	5	Speed Management
165	6/16/2020	Miriam Schoenbaum			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.	1	Vision
166	6/16/2020	Miriam Schoenbaum			Roads should not be classified based on current levels of non-motorist activity. Current levels of non-motorist activity are the result of current road design.	1	Vision
167	6/16/2020	Miriam Schoenbaum			3. Just as we build roads for peak motorist activity, 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.	3	Bikeways
168	6/16/2020	Miriam Schoenbaum			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, protected bike lanes for bicyclists.	3	Bikeways
169	6/16/2020	Miriam Schoenbaum			No road in Montgomery County, including major highways, should have a target speed higher than 35 mph - except 270, the Beltway, and the ICC.	5	Speed Management
170	6/16/2020	Miriam Schoenbaum			No channelized right turn lanes. Also, no right-in-right-out driveways with islands.	4	Intersections
171	6/16/2020	Miriam Schoenbaum			No multi-lane roundabouts.	4	Intersections
172	6/16/2020	Miriam Schoenbaum			No 85%th percentile speed.	5	Speed Management
173	6/16/2020	Miriam Schoenbaum			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.	4	Intersections

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
174	6/16/2020	Miriam Schoenbaum			The default corner radius should be 10', not 15'.	4	Intersections
175	6/16/2020	Miriam Schoenbaum			Where ROW is insufficient for adding pedestrian/bicyclist facilities without reallocating road space away from cars, road space should be reallocated away from cars.	4	Prioritization
176	6/16/2020	Marion Schoenbaum			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 should be removed.	1	Vision
177	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			The tables and text do not adequately explain certain street and bikeway configurations	3	Bikeways
178	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			the whole guide may lack enough detail to fully inform street designs.	3	Bikeways
179	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			The document lacks an overall summary of its street zone system and there are inconsistencies in the zone definitions and terms.	1	Typologies
180	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			The document should be significantly expanded and several sections rewritten. Then the guide should be re-released for public comment rather than move on to the next step.	1	Public Process
181	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	13	Figure 1-3	Missing synopsis of the guide's zone system: A key missing element is any kind of overall guide to the zone system near the front of the document. There is no textual synopsis of the system and there's just one diagram – Fig. 1-3 on p. 13. But that diagram includes almost no text, has errors, and doesn't depict a separated bike lane at all. One must figure out the zone system by reading the rest of the document, which is difficult given the guide's lack of clarity on SBLs .	1	Typologies
182	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Desire for basic street templates. See comment letter	1	Typologies
183	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			What zones are separated bike lanes in? The document is confusing and contradictory as far as which zone SBLs are in. Are they in the Sidewalk Zone? The Curbside Zone? Some pages imply that they're always on the sidewalk side of the "street buffer" and thus in the Sidewalk Zone (p. 32), yet other pages put them in the Curbside Zone (p. 64 and figs. 5-1 and 5-2). Fig. 1-3 actually puts them in the "street buffer". None of the zone-specific chapters lay claim to SBLs in the text, though some include SBLs in their diagrams.	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
184	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			In any case, I'd like to see SBLs placed in one zone and only one zone, regardless of whether they're street-level or sidewalk-level. This avoids having to always distinguish between street-level and sidewalk-level SBLs. But whatever is decided, just make it clear in the guide. If SBLs can be in two different zones, state that clearly and always say "street-level SBL" and "sidewalk-level SBL", not simply "SBL".	3	Bikeways
185	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	24-47		The street cross section diagrams on pages 24-47 are confusing, at least where separated bike lanes (SBLs) are concerned.	1	Typologies
186	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			The three terms "Street Buffer Zone ", "Buffer Zone", and "street buffer" (sometimes upper case, sometimes lower case) seem to be used interchangeably. Use one term. (I'm just calling it "street buffer" to refer to the area as I've defined it, whether or not it's a zone).	1	Typologies
187	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			The very term "sidewalk buffer" is confusing. The only time a sidewalk buffer is present is if there's an SBL. It's essentially an "SBL-sidewalk" buffer. It could be called an "SSW buffer" or a "bike-ped buffer" or something.	2	Sidewalk Zone
188	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	13	Figure 1-3	The caption itself is confusing, since it says "Street Zones defined", but "Street Zone" is one of the zones. Maybe the caption should be "Zones of a street, defined". The table is floating at the end of section 1.4, hardly where you'd put the guide to the entire zone system. The figure states that "bikeways" and "buffer" are among the uses of the "Street Buffer Zone". But bikeways are not in that zone. The figure shouldn't just say "bikeway" in the zones where bikeways may be located; it should be specific and identify bikeway types.In any case, this diagram should be replaced with 6 new diagrams and plenty of text, as I describe above.	1	Typologies
189	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	This row does not appear to reflect the fact that when an SBL is present, this buffer is positioned between the SBLs and the Street Zone. In this case, the "minimum" width should be 3', and the "preferred" width something wider (4'? 6'?).	3	Bikeways
190	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	On other other hand, if the bikeway is a conventional bike lane (or buffered bike lane), this statement is not true: "The street buffer is the space between the travel or parking lanes and the bikeway or sidewalk." The line needs to indicate which bikeway type(s) it's referring to, and do it correctly.	3	Bikeways
191	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	Generally sentences of that form are difficult to parse. Instead of saying "between A or B and X or Y", say "between A or B on one side, and X or Y on the other".	3	Table

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
192	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	If on-street parking is part of the buffer zone and abuts the Pedestrian Clear Zone… How can parking be part of the buffer zone? This contradicts the statement "The street buffer is the space between the travel or parking lanes and the bikeway or sidewalk."	3	Bikeways
193	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	If on-street parking is part of the buffer zone and abuts the Pedestrian Clear Zone, a minimum 2' offset is required between the face of curb and the Pedestrian Clear Zone, and a minimum of 5' clear zone is required outside of the door swing zone of a parked car, to maintain accessibility. Is this taking bicyclists into account? The 2' and 5' aren't nearly enough if the PCZ is a sidepath. If it's a sidepath, extra space is needed for cyclists in order to prevent dooring, conflicts with people loading/unloading their car, and conflicts with people standing at the parking meter.	3	Bikeways
194	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	The caveat "(if sidewalk or sidepath is provided)" stated for Country Connector should be stated for Country Road as well.	3	Table
195	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	Where it says "buffer zone", it apparently means "Street Buffer Zone" (fix this in the entire table).	3	Bikeways
196	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	These concerns also apply to Fig. 8-25 on p. 201.	3	Bikeways
197	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Default Bikeway Type and Width ROW	Default bikeway types apply to streets without master planned bikeways. This is redundant with "If the Bicycle Master Plan recommends something different for a specific street, that supersedes this guidance"	3	Bikeways
198	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Default Bikeway Type and Width ROW	That line also implies that streets without master-planned bikeways should usually get the default treatment. Calling a bikeway type the "default" gives it too much weight. See my comment below. The width guidelines listed in the Default Bikeway Type column of the table are helpful, however.	3	Bikeways
199	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Default Bikeway Type and Width ROW	These parenthetical references are a problem: "Dimensions do not include the street buffer (see below) or sidewalk buffer (ranges from 0'-6', see Section 6.2)." Referring readers to the next row of the table – "(see below)" – refers them to the extremely simplified (and for now, incorrect) definition of street buffers, when it should just refer them to the bike chapter. Also, "Section 6.2" is not the correct section.	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
200	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Default Bikeway Type and Width ROW	If bikeway is adjacent to the curb, dimensions include the gutter pan. It should say "If bikeway is at street level and adjacent to the curb…" to exclude the case where the SBL is at sidewalk level (on the high side of the curb).	3	Bikeways
201	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Default Bikeway Type and Width ROW	These concerns also apply to Fig. 8-25 on p. 201.	3	Bikeways
202	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2 Pedestrian Clear Zone ROW	In the Description, state the definition first: "This is either a sidewalk or sidepath."	3	Table
203	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	The fundamental table problem on p. 55 is that it bites off more than it can chew. As a result, it oversimplifies bike considerations, yet it's already too large. I would break it into multiple tables. But some changes might help:	3	Table
204	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	To nominally improve the table, add an additional row for "Sidewalk Buffer", which would make it clear that there is more than one buffer in the SBL case. It would say something like "This is the buffer between the SBL and the Pedestrian Clear Zone, if an SBL is present". It would also note that if the SBL is at street-level and the street buffer is narrow, the sidewalk buffer is where to put bike docks, trash cans, etc. (If you decide SBLs go in the Street Zone, ignore this comment)	3	Bikeways
205	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55	Figure 3-2	To further improve the table, use separate rows for each major type of bikeway (sidepath, on-road, and SBL), since each has a different role in the cross section. That means two additional rows.	3	Bikeways
206	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	201	Figure 8-25	The table in Figure 8-25 on page 201 adds no value. The table on p. 201 is in the bikeway chapter, but it's little more than an excerpt of the table on p. 55, even though the excerpt addresses more than just bikeways. The table on p. 201 should be more specific, detailed, and useful.	3	Bikeways
207	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	64	Diagram	Based on the diagram and text on p. 64, the SBL are never in the Sidewalk Zone. This is wrong based on my understanding. The "sidewalk buffer" is also never mentioned.	3	Bikeways
208	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	63		On p. 63, it states, "The sidewalk is comprised of three zones: the Street Buffer Zone, the Pedestrian Clear Zone, and the Frontage Zone." Replace "sidewalk" with "Sidewalk Zone" in that line.	2	Sidewalk Zone

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
209	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	66		That same line on p. 66 also puts the "Street Buffer Zone" between the SBL and the travel lanes – thus putting the SBL squarely in the Sidewalk Zone. This seems to confirm my understanding.	3	Bikeways
210	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates		Chapter 4	Street Chapter 4 should clarify that if the SBL has just a narrow street buffer, as is typical for street-level SBLs, things like trash cans and bike docks should go in the sidewalk buffer, not the street buffer.	3	Bikeways
211	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	93		The text on p. 93 does not have SBLs in the "Curbside Zone". But the diagram on that page shows them there.	3	Bikeways
212	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	184-186		It would be extremely helpful to show the main cases of bikeway treatments in 3D perspective. These 2D diagrams are more difficult to comprehend visually. Parked cars are hard to distinguish from moving ones. Bike lanes are hard to distinguish from travel lanes.	3	Bikeways
213	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	184-186		It would be helpful to show the recommended dimensions for each bikeway and buffer. Be sure to require at least a 3' buffer between parking and an SBL.	3	Bikeways
214	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates		Figure 8-9	Figure 8-9, the configuration is labeled "interim", but this is often preferred over the Fig. 8-10 configuration labeled "permanent". Setting the SBL further back from the street can lead to reduced visibility of/by traffic, greater pedestrian encroachment, more frequent obstruction by drivers waiting to pull out from side streets, and greater difficulty turning or shifting into the travel lanes (by bikes). At this rate, separated bike lanes will be so distant from the roadway that they'll be little more than sidepaths, which are inappropriate in an urban area. Intersections are by far the most dangerous part of an SBL anyway.	3	Bikeways
215	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Listing the street types associated with each cross-section is tying street types too closely to their default bikeway types. The master plan is full of streets that don't use the default bikeway type.	3	Bikeways
216	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			More cross-sections should be depicted in these figures, corresponding to the most common bikeway permutations as described below. No figure even shows on-road bike lanes, despite being master-planned on several streets.	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
217	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	184-186		Factors like the position and type of bikeways result in several bikeway permutations, each of which might impose different width requirements on each cross section element. I've identified the following 14 permutations, which cover most streets. Except for the first three, make sure each permutation has its own diagram on pp. 184-186.	3	Bikeways
218	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	184-186		Each of these permutations should have "preferred" and "required" widths for each element.	3	Bikeways
219	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Default bikeway type – general considerations. The concept of a "default" bikeway for each street type is very simplistic. For any street improvement, a wide array of bikeway options must be considered and evaluated. The "default" indication could prejudice designers against using other types. For example, one-way vs. two-way SBLs are probably used with equal likelihood. Something as complex as the choice between one-way and two-way SBLs	3	Bikeways
220	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Similarly, the diagrams showing the default type (pp. 184-186) could prejudice designers against 2-way separated bike lanes if they aren't shown.	3	Bikeways
221	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Conventional bike lane door zone: The combined width of a conventional bike lane and adjacent parking lane must be a minimum of 14', preferably 15', so the bike lane can lie outside the car door zone. If it's a buffered bike lane, the combined width of the bike lane, parking, and buffer must meet this requirement.	3	Bikeways
222	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			SBL door zone: A minimum 3' buffer is required between a parking lane and an SBL to keep cyclists out of the "door zone". 4' is preferred. 2' is not enough.	3	Bikeways
223	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			SBLs without parking are often preferred over SBLs with parking. State this in the guide. SBLs behind parked cars are often a problem due to visibility issues, blocking by cars waiting to pull out from side streets/driveways, pedestrians walking to/from their car, more frequent encroachment by pedestrians, and difficulty for cyclists to exit the SBL mid-block. Consider moving parking to one side of the street and putting a 2-way SBL on the other side if parking must be retained.	3	Bikeways
224	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	213-214	9.3	Curb extensions and bumpouts: Installing curb extensions or bumpouts that block an existing shoulder should be done in a way that does not needlessly block the shoulder for cyclists. The solution is usually to provide a slot through the bumpout or a ramp that goes up and over the bumpout that cyclists can use. Sometimes MCDOT does this, but other times they forget. The consideration applies even if there's a parallel sidepath or SBL.	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
225	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	214	9.3	Traffic-calming median islands – Installation of small median islands to create neckdowns for drivers can result in the elimination of short segments of shoulder used by bicyclists. The solutions are not as easy as with curb extensions, but shoulder bicyclists should at least be considered in every such case, and if necessary a small shoulder should be continued through the neckdown.	3	Bikeways
226	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Breakout gaps – Gaps in the barrier separating the SBL from the travel lanes are important for multiple reasons. Such gaps or "breakouts" are needed so cyclists can cross the street between sanctioned crossings (to turn left, for example), go around obstacles like debris or pedestrians, and shift left as needed to make conventional left turns. The easiest solution is just to make the barrier "porous" by constructing it using curbstops, planters or flex posts.		Bikeways
227	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	46		Major Highways (p. 46, etc.) – Fully grade-separated highways like the ICC are often ideal places to put such parallel trails because of the lack of at-grade crossings. Instead of implying that these highways don't need bike/ped accommodations unless noted in a master plan, stipulate that every new major highway should include a shared use path (or hiker-biker trail) by default. Also emphasize that every crossing over or under the highway should include bike/ped accommodations.	3	Bikeways
228	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates			Sidepath/street buffer allocation For sidepaths, an 8' sidepath next to a 4' street buffer is preferable to a 10' sidepath next to a 2' street buffer. One exception may be if there's a wide shoulder (which acts as a sort of buffer).	3	Bikeways
229	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	57		Bikeway priority (p. 57) – The priority of "Bikeway" should be high on any master-planned bikeway.	4	Prioritization
230	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55		Shoulder widths. Regarding Country Road and Country Collector widths, the guide says shoulders on these streets should be 4' and 8' wide, respectively. It says that if the shoulders are bikeways, width should be 8' or 10' wide, respectively. But all shoulders are in effect bikeways for the many riders who use them. A simple solution is to make the default shoulder width a minimum of 5', not 4', since 4' is inadequate (especially with striping imprecision, decaying edges, etc.).	3	Street Zone
231	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	55		In reality, for bicycling purposes, a full 8' or 10' shoulder is welcome but not needed. Onerous minimum width requirements could push designers into giving up on bikeable shoulders and just providing a shared use path instead, which on rural roads is usually the wrong choice.	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
232	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	138		Bike crossing markings (p. 138). We wholeheartedly support the dimensions specified for bike crossing markings – the "green bars". The guide stipulates 2' wide green bars separated by 2' wide gaps. This 1-to-1 ratio of gaps to bars is crucial. Wider gaps make the bars less noticeable to drivers and more difficult to pick out in the ocean of white crosswalk bars seen at some intersections. Fig. 8-6 (p. 182) demonstrates the noticeability problem: there's only a single bar between the driveway edges, and emerging drivers might not realize it's a bike crossing. I also recommended using a photo of a crossing that meets the standard.	4	Intersections
233	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	42, 44		Country Connector/Country Road accommodations (p. 42 and p. 44) – The text for both of these road types (Country Roads, not just Country Connectors) should indicate that the roads may be popular recreational bike routes. Also for both road types it says, "Due to higher speed vehicle traffic, designs should provide ample separation from vehicle traffic for pedestrians and bicyclists." But "separation" might not be the right word, as it implies separated bikeways, which are often not the best solution on these roads.	3	Bikeways
234	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	42, 44		Default bikeway type for country connectors and roads. For Country Connectors and Country Roads, the draft guide correctly states that one of the default bikeway types is the shoulder bikeway (if you're specifying defaults at all). But some members of the public have asked that these roads only have sidepath as a default.	3	Bikeways
235	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	138		Ramp crossings (p. 138). The text says grade-separated crossings should "be a minimum of 12 feet wide (2-foot-wide buffer, 8-foot-wide sidepath, 2-foot-wide buffer) between walls and railings where the connecting bikeway is a sidepath". Is there always a railing? Suffice it to say that providing just a two foot buffer between a sidepath and the curb is not appropriate unless there's a railing. Bicyclists could easily fall into the roadway.	3	Bikeways
236	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	107		Median width (p. 107) – Text states "the minimum median width is 6 feet for all street types" in bold. But there are places where the median must be reduced to just a narrow strip in order to fit a bikeway in. This should be addressed in the bike section.	5	Bikeways
237	8/4/2020	Jack Cochrane, Montgomery Bicycle Advocates	192-193		Sharrows (pp. 192-193) – It's unclear if these terms all refer to the same thing: "shared lane marking" (in the figure caption and text), "priority shared lane marking" (in the heading and text), and "standard shared lane marking" (in the text). Yet nowhere is the word "sharrow" used, which is the common name. Also, the minimum distance from the curb to the sharrow in case of parking isn't given, despite the note saying sharrows may be used to keep cyclists out of the door zone. This distance in case of parking should be at least 13', never 11'	3	Bikeways

Comment #	Date	Commenter	Page Number	Location on page	Comment	Work-session	Subject Area
238	8/25/2020	Project Team	139		Last Paragraph of Bike Crossings at Freeway Ramps -- the link for "Montgomery County's Bicycle Facility Design Toolkit (Appendix B)" does not work.	3	Bikeways
239	8/25/2020	Pedestrian Master Plan Advisory Committee	155-157		Should add a part on Exclusive Pedestrian Intervals (Barnes Dance)	4	Intersections
240	8/25/2020	Aging, Disabilities, Accessibility group			This guide should be available in multiple languages (or at least in Spanish).	1	Public Process
241	8/25/2020	Aging, Disabilities, Accessibility group	8-9		Add info on demographics of an aging county. Include a statement that this intends for design to account for disability needs.	1	Vision
242	8/25/2020	Project Team	57		What's the utility of including Travel Lane Width in the Priorities Table? The defaults are already the minimums; Low / Med / High have no meaning here.	4	Prioritization
243	8/25/2020	Project Team	57		Dedicated Transitways are High Priority in each case where they are present. How much effect do we really see if a transitway is 13' vs 12'? Or if the buffer is 6' vs 2'? Could Transitways be Medium? There have been a few test-runs where I've found that I'd have rather pulled 5' out of the transitway than bikeways or buffers, assuming a bus still runs just fine in that remaining width.	4	Prioritization
244	8/25/2020	Project Team	228-231		Consider adding a new section in Chapter 10... perhaps between 10.1 and 10.2, or between 10.2 and 10.3. This section would reference some things that should be used in prioritizing implementation of retrofits and reconstructions within the Capital Improvement Program. It would call out Equity Emphasis Areas, School Zones, and Bicycle Pedestrian Priority Areas as being examples of areas that should be given greater weight in allocating funding and resources.	5	Implementation
245	8/25/2020	Project Team	217	Enforcement	Add some text to Enforcement to add... - Design is the favored means inducing motorists to obide by traffic laws, reducing the need for enforcement. - Where enforcement remains necessary: automated enforcement is the preferred means of enforcement as to reduce interactions with officers and improve equitable (equal?) application of law.	5	Speed Management

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246	8/25/2020	Reemberto Rodriguez, Silver Spring Regional Service Center	230-231	10.2	Add mention of Urban Districts to graphic showing maint responsibilities (maybe a footnote/asterisk?), and review mentions of streetscaping for needed references to Urban Districts.	5	Implementation
247	8/25/2020	Gary Erenrich, MCDOT			Clarify how this will apply to private streets.	1	Vision
248	8/25/2020	David Anspacher			Do we need more on transitions & gateway treatments; how to really get traffic to slow down? We mention transitions a few times, but I don't think we have a section specifically on it. Might be appropriate in Ch2 or Ch3?	3	Street Zone
249	8/25/2020	Project Team	55-57		p55 gives a 0-7 ft frontage zone for Country Connectors p57 gives N/A as a priority for frontage zones on Country Connectors One of these needs to change: either zero the frontage zone, or assign it a Low priority.	3	Table
250	8/25/2020	Project Team	54-55		Some page references on p54/55 do not appear to be correct, such as Default Bikeways ref p195 should instead ref either p176 or p201.	3	Table
251	8/25/2020	Project Team			Should Bikeways (Ch8) be moved up, such as between Ch5 and Ch6?	3	Bikeways
252	8/25/2020	Project Team			Could we work Open Section Roadways info (p84) into the Street Buffers info on p55?	3	Table
253	8/25/2020	Project Team	74	4.4	Consider adding a line to the 1st paragraph for the Ped Clear Zone suggesting that the Ped Clear Zone include some form of distinction along each edge, or that it be a have a distinct pavement treatment from adjacent zones.	2	Sidewalk Zone

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254	8/27/2020	Project Team	42,44,46		Graphics need to show the open section drainage ditch (left side) as being in a Street Buffer.	1	Typologies
255	8/27/2020	Project Team			Don't need Maintenance Buffers is the outermost part of a roadway is a Street Buffer (such as along an open section w/o sidewalk). Check text for Maint Buff, Street Buff, and Open Section Roadways to see that we say this.	2	Sidewalk Zone
256	8/27/2020	Project Team	123	6.4	Add a footnote to the references to WB-40, WB-50, WB-62 clarifying that these are different-size tractor trailers.	4	Intersections
257	8/27/2020	Project Team	54		Change Left Turn Lane for both Downtown columns to read 10' default, 9' minimum	3	Street Zone
258	8/27/2020	Project Team	102		Need to flatten Figure 5-13	3	Street Zone