



## Attachment 14

### DEPARTMENT OF TRANSPORTATION

Marc Elrich  
*County Executive*

Christopher Conklin  
*Director*

July 22, 2022

Mr. Ryan Sigworth, Planner II  
Up-County Planning Division  
The Maryland-National Capital  
Park & Planning Commission  
2425 Reedie Drive  
Wheaton, MD 20902

RE: Preliminary Plan No. 120210180  
Traffic Impact Study  
Hammer Hill Daycare  
**REVISED LETTER**

Dear Mr. Sigworth:

This letter supersedes the previous letter dated June 10, 2022. We have completed our review of the preliminary plan uploaded to Eplans on May 11, 2022. Previous versions of these plans were reviewed by the Development Review Committee (DRC) at its meeting on April 13, 2021. We recommend approval of the plans subject to the following comments:

### **Preliminary Plan Review Comments**

#### Significant Review Comments

1. The applicant submitted a revised Traffic Impact Study (TIS) dated May 19, 2022, which included a queuing study on northbound and southbound Frederick Road (MD 355)/site driveway access and Frederick Road (MD 355)/Stringtown Road. The study analyzed queues both with and without a separate, north bound left-turn lane at the site entrance. The study provided the following results:

#### **Intersection Queuing Without Separate Left Lane:**

- **MD 355/Site Driveway:** The southbound 95<sup>th</sup> percentile AM peak hour queuing is 451', which extends past the Redgrave Place/Clarksburg Square Road intersection, with the site generated trips adding 56 peak hour vehicles. The TIS stated that the situation compromises

#### **Office of the Director**

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*Located one block west of the Rockville Metro Station*

traffic safety and does not provide adequate gaps for vehicles to make a safe left turn.

- **MD 355/Stringtown Road:** The southbound through/right 95<sup>th</sup> percentile AM/PM peak hour queuing is 276'/269', respectively; both queues extend past the site access, which the TIS also states creates an unsafe situation. In addition, the southbound left storage measures only 110' (based upon GIS data), but the TIS mistakenly lists this storage as 150'. Based upon the reduced storage, there will be spillover from the left turn lane into the thru lane which will result in additional queuing.

#### **Intersection Queuing With Separate Left Lane:**

- **MD 355/Site Driveway:** In the southbound direction, the TIS states in this condition, while the storage is adequate from the site access to Redgrave Place, the queuing from Stringtown Road will extend past the site access, which creates unsafe condition.
- **MD 355/ Stringtown Road:** The southbound through/right 95<sup>th</sup> percentile AM/PM peak hour queuing is 261'/281', respectively; both queues extend past the site access, thereby creating an unsafe situation.

The subject property has street frontage along Frederick Road (MD 355), which is maintained by Maryland State Highway Administration (MSHA). Therefore, MCDOT does not have any jurisdiction, and per Montgomery County Code Chapter 50 Section 4.2, MCDOT shall provide recommendations for the attention of the concerned agencies as stated below. Of the two options presented, MCDOT suggests SHA require the option with a separate left turn lane along northbound Frederick Road (MD 355).

In addition, the site is constrained by the build-to line, the Clarksburg Historic District and an impervious cap for a portion of site that is located in the Clarksburg Special Protection Area. As such, maintaining build-to line, the character and integrity of the Historic District and staying within the impervious cap, MCDOT recommends if it is possible that an additional right-in/right-out vehicular access point onto Stringtown Road. MCDOT believes that adding a secondary access point will help mitigate the queuing issues and enhance safety. Again though, if the issues listed above cannot be overcome, the second access point may not be feasible.

2. The revised TIS indicated that the proposed daycare facility will generate 199-person trips and is in the Orange Policy Area. Per the 2020 Growth and Infrastructure Policy, sites located in the Orange Policy Area generating between 100-199-person trips must ensure that there are at least two bus shelters within 1000' of the site that are outfitted with realtime travel information (RTI) displays. The off-site improvement cost limit for this project is \$5,063 per the LATR proportionality guide, and the cost for two bus shelters with RTI displays is a significantly higher amount. Therefore, MCDOT will not require these bus stop improvements as part of this project.
3. As stated above in Comment #2, the off-site improvement cost limit for this project is \$5,063 per the LATR proportionality guide. The applicant is proposing \$5,063 worth of local street tree planting

to satisfy this requirement. However, the goal of the improvement is to enhance pedestrian safety, and street trees do not achieve that goal. Therefore, MCDOT requests that the Planning Board require the applicant to work with MCDOT to find alternate improvements that will improve pedestrian safety.

4. The applicant will be required to remove the existing asphalt path along the Stringtown Road frontage and construct a 10' asphalt, shared use path from the west corner of the Stringtown Road/Frederick Road (MD 355) intersection to the north corner of the Stringtown Road/Observation Drive intersection.
5. Provide dedication along the Frederick Road (MD 355) frontage per the master plan.

#### Standard Review Comments

6. All Planning Board Opinions relating to this plan or any subsequent revision, project plans or site plans should be submitted to the Montgomery County Department of Permitting Services in the package for record plats, storm drain, grading or paving plans, or application for access permit. This letter and all other correspondence from this department should be included in the package.
7. We defer to Maryland State Highway Administration (MSHA) for sight distance and improvements along Frederick Road (MD 355).
8. The storm drain analysis was reviewed and is acceptable to MCDOT. No improvements are needed to the downstream County storm drain system for this plan.
9. Provide on-site handicap access facilities, parking spaces, ramps, etc. in accordance with the Americans with Disabilities Act.
10. Relocation of utilities along existing roads to accommodate the required roadway improvements shall be the responsibility of the applicant.
11. If the proposed development will alter any existing street lights, replacement of signing, and/or pavement markings, please contact Mr. Dan Sanayi of our Traffic Engineering Design and Operations Section at [yazdan.sanayi@montgomerycountymd.gov](mailto:yazdan.sanayi@montgomerycountymd.gov) or (240) 777-2190 for proper executing procedures. All costs associated with such relocations shall be the responsibility of the applicant.
12. Trees in the County rights of way – spacing and species to be in accordance with the applicable MCDOT standards. Tree planning within the public right of way must be coordinated with DPS Right-of-Way Plan Review Section.
13. Posting of a ROW permit bond is a prerequisite to MCDPS approval of the record plat. The permit will include, but not necessarily be limited to, the following improvements:

- a. Curbs, gutters, storm drain, asphalt sidepath and street trees along Stringtown Road.
- b. Permanent monuments and property line markers, as required by Section 50-4.3(G) of the Subdivision Regulations.
- c. Erosion and sediment control measures as required by Chapter 19 of the Montgomery County Code and on-site stormwater management, where applicable, shall be provided by the Developer (at no cost to the County) at such locations deemed necessary by the Department of Permitting Services (DPS) and will comply with their specifications. Erosion and sediment control measures are to be built prior to construction of streets, houses and/or site grading and are to remain in operation (including maintenance) as long as deemed necessary by MCDPS.
- d. The developer shall provide street lights in accordance with the specifications, requirements, and standards prescribed by the MCDOT Division of Traffic Engineering and Operations.

### **Traffic Impact Study Review Comments**

We have completed our review of the revised Traffic Impact Study (TIS) dated May 19, 2022. Total development evaluated by this analysis includes:

- Daycare facility with capacity of up to 216 students

Based upon our review, we have the following comments:

#### General Comment

1. The traffic counts were collected on March 29, 2022.
2. The study is based upon the 2020-2024 Growth and Infrastructure Policy adopted on November 16, 2020 (Council Resolution #19-655).

#### Adequacy Determination

1. The study indicates that the subject development will generate between 100-199 total weekday peak hour person trips; therefore, all Adequacy tests are required. The school is located in the Clarksburg Town Center "Orange" Policy Area. Therefore, the pedestrian and bicycle adequacies are to be evaluated within a 750' walkshed, and there must be a minimum of two (2) bus shelters within 1,000 feet.

#### Motor Vehicle System Adequacy

1. The subject development is required to meet the Local Area Transportation Review (LATR) test for motor vehicle system adequacy. The LATR test for the Clarksburg Town Center policy area uses the Highway Capacity Manual (HCM) congestion standard with an average vehicle delay standard of 63 seconds per vehicle.
2. The consultant studied four (4) intersections, including the site entrance on Frederick Road (MD 355), and concluded that the total future conditions for these intersections will not exceed the congestion standard for the Clarksburg Town Center policy area. We concur with the consultant's findings.
3. The TIS included a queuing study on northbound and southbound Frederick Road (MD 355)/site driveway access and Frederick Road (MD 355)/Stringtown Road. The results and recommendations are discussed above in the Preliminary Plan review portion of this letter in Comment #1.

#### Pedestrian System Adequacy

1. The Pedestrian System Adequacy Test is required since the daycare facility will generate 50 or more peak hour person trips. This test consists of pedestrian level of comfort, street lighting and ADA compliance. The site is located in the Orange Policy area and will generate between 100 and 200 peak hour person trips. Therefore, pedestrian adequacy was evaluated within a 750-foot walkshed.
2. **Pedestrian Level of Comfort (PLOC):** Sidewalks and pathways were evaluated within a 750-foot walkshed. For a site to achieve adequacy, roads classified as primary residential or higher must score either PLOC-2 (somewhat comfortable) or PLOC-1 (very comfortable). The consultant identified deficient PLOC items. The applicant will be required to remove the existing asphalt path along the Stringtown Road frontage and construct the 10' asphalt, shared use path from the west corner of the Stringtown Road/Frederick Road (MD 355) intersection to the north corner of the Stringtown Road/Observation Drive intersection as required in the 2018 Bicycle Master Plan. The applicant is constructing a 6' concrete sidewalk along the Frederick Road (MD 355) frontage, and there is a Capital Improvement Project (CIP #501744) for an 8' asphalt, shared-use path along the east side of Frederick Road (MD 355).
3. **Streetlight Evaluation:** The consultant evaluated approximately 80 streetlights within the study area, and all lighting were found to be functional with no service calls or outages reported, with the exception of Pole #16030 on Stringtown Road, approximately 180' west of Frederick Road (MD 355). However, a current review of the County's streetlight inventory website

(<https://www2.montgomerycountymd.gov/dot-streetlight/SimpleMap.aspx>) shows that Pole #16030 is now functioning.

4. **ADA Compliance:** The consultant identified non-compliant ramps within the study area, and the results are listed in Table 4-4 of the study. The applicant will be responsible to install a Detectable Warning Surface (DWS) where missing.

#### Bicycle System Adequacy

1. A low Level of Stress (LTS-2) is required to achieve bicycle system adequacy. The consultant identified all existing and planned bike facilities in Figure 4-4. The proposed, master-planned sidepath along Stringtown Road and CIP #501744 will provide the LTS-2 condition.

#### Transit System Adequacy

1. Since the project will generate between 100 and 200 peak hour person trips, two bus shelters are typically required within 1,000 feet of the school. However, consistent with the LATR Proportionality Guide, the bus shelters were not prioritized for inclusion in the project mitigation.

#### Vision Zero Statement

1. The consultant evaluated roadways and crash data within the study area and concluded that none of the road segments are in the High Injury Network (HIN). The consultant identified one crash as having possible serious injury in Table 5-1, however, MCDOT determined that there have been no fatal crashes within the study area in the past five years. The consultant conducted speed studies on Stringtown Road east and west of Frederick Road (MD 355) and on Frederick Road (MD 355) north and south of Stringtown Road. The studies showed that the 85<sup>th</sup> percentile speeds were 10 mph or higher above the posted speed limits in almost all cases. The applicant recommended installing speed cameras. However, MCDOT doesn't control speed cameras.

Mr. Ryan Sigworth  
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Thank you for the opportunity to review this preliminary plan. If you have any questions or comments regarding this letter, please contact me at [william.whelan@montgomerycountymd.gov](mailto:william.whelan@montgomerycountymd.gov) or (240) 777-2173.

Sincerely,

*William Whelan*

William Whelan  
Development Review Team  
Office of Transportation Policy

[SharePoint/transportation/directors office/development review/WhelanW/120210180 Hammer Hill Daycare - MCDOT REVISED letter 072222.docx](#)

cc: Correspondence folder FY 2022

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