

## RUSTIC ROADS FUNCTIONAL MASTER PLAN UPDATE WORK SESSION #1



Batson Road

### Description





Rustic and exceptional rustic roads are historic and scenic roadways that reflect the agricultural character and rural origins of the county. The roadways provide the county with unique opportunities to promote agritourism, heritage tours, and economic development. The historic and cultural resources near the roads continue to be preserved for county residents and visitors to enjoy and explore. Preserving rustic roads is an important way to relay the county's history to future generations. The *Rustic Roads Functional Master Plan Update* is the first comprehensive update to the *Rustic Roads Functional Master Plan* since the original plan was approved in 1996.

Completed: 12-30-2022

MCPB  
Item No. 8  
01-05-2023

Montgomery County  
Planning Board  
2425 Reedie Drive, Floor 14  
Wheaton, MD 20902

## Planning Staff

	Jamey Pratt, Planner III, Upcounty, <a href="mailto:jamey.pratt@montgomeryplanning.org">jamey.pratt@montgomeryplanning.org</a> , 301.495.4588
	Roberto Duke, Planner III, Upcounty, <a href="mailto:roberto.duke@montgomeryplanning.org">roberto.duke@montgomeryplanning.org</a> , 301.495.2168
	Angelica Gonzalez, Acting Supervisor, Upcounty, <a href="mailto:angelica.gonzalez@montgomeryplanning.org">angelica.gonzalez@montgomeryplanning.org</a> , 301.495.4583
	Patrick Butler, Chief, Upcounty, <a href="mailto:patrick.butler@montgomeryplanning.org">patrick.butler@montgomeryplanning.org</a> , 301.495.4561

---

### STAFF RECOMMENDATION

The Planning Board will discuss public testimony on the *Rustic Roads Functional Master Plan Update*, which includes oral testimony from the Public Hearing and any written comments received before the closing of the public record. Planning Staff will ask the Planning Board to confirm existing plan recommendations or revised recommendations based on the testimony.

---

### INTRODUCTION

The Planning Board held a Public Hearing on the Rustic Roads Functional Master Plan Update (“Public Hearing Draft”) on November 17, 2022. At the Hearing, the Planning Board approved holding the public record open until December 9, 2022. 104 individuals and organizations testified in person or submitted written comments. Planning Staff plans to hold a series of work sessions to discuss the testimony received with the Planning Board.

Work sessions are not public hearings and offer the Planning Board and opportunity to review testimony and comments with Staff, other agency representatives or stakeholders who provided testimony, as appropriate to make decisions and final recommendations on the Public Hearing Draft. Ultimately, the work sessions will result in a Planning Board Draft with a “final vote out” that is sent to the County Council for their review and approval.

The comments received were divided into the following broad categories:

- General support of the Rustic Roads Program
- Support and non-support for adding new roads and significant features to the program
- Plan organization
- Maintenance issues
  - Roadside vegetation and tree trimming
  - Bridges

- Drainage
- Composition and duties of the Rustic Roads Advisory Committee (RRAC)

Although subject to change by direction from the Planning Board, staff anticipates three work sessions as follows:

#### Work session 1

- Overview of the categories of road recommendations
- General support and opposition for the Rustic Roads Program
- Discussion of road recommendations

#### Work session 2

- Plan organization
- Maintenance issues

#### Work session 3

- RRAC membership and membership criteria
- Final vote on the plan

This document describes the issues to be discussed at the first work session, which will mainly focus on how comments received affect the plan's recommendations for individual roads. Subsequent work sessions will cover the other topics identified above and any others that may arise during discussions.

This work session has been organized to review the plan's recommendations for individual roads in groups corresponding to the *Road Recommendations* chapter in the master plan. Planning Staff does not intend to discuss all 125 roads nominated for or already in the program unless Board members have specific questions regarding a particular road. Since many of the roads were only being updated to reflect new graphics or text, Staff wanted to focus on specific roads and their recommendations. A list of roads in each category will be presented followed by a discussion of any roads in that category for which comments were received. Roads falling in more than one category may be discussed separately as part of each category. Planning Board Commissioners are encouraged to bring up any roads they wish to discuss further during the work session. Planning Staff can also revisit any recommendations after further work sessions and context.

The Public Hearing Draft is available at the following link:

<https://montgomeryplanning.org/planning/transportation/highway-planning/rustic-roads/rustic-roads-functional-master-plan/>

An interactive map is also available on that website for viewing the individual rustic road profiles and road recommendations.

A summary of all comments received and Staff's response to those comments is included in the first attachment to this report. The actual written testimony received has been included as an additional attachment. For oral comments, see the [November 17, 2022 Public Hearing video](#). The hearing begins at the 4:38 mark in the video.

---

## GENERAL SUPPORT FOR OR OPPOSITION TO THE RUSTIC ROADS PROGRAM

Numerous individuals and organizations testified or submitted written comments stating strong support for the Rustic Roads Program and their desire that the program be continued, strengthened, and/or expanded. Some reasons provided: the roads are among the county's most significant assets; they provide an enhanced quality of life; they provide recreational opportunities (hiking, bicycling, horse riding); they provide access to historic, natural, and agricultural resources; and they are a source of civic pride. Additionally, many of these roads are critical to support agriculture and agritourism, and many have potential to support economic development in rural areas and the Agricultural Reserve.

While not all rustic roads are in the Agricultural Reserve and not all roads in the Reserve are rustic, many feel that the rustic roads are an important part of the Reserve and should be preserved. Some remarked that rustic roads provide a peaceful experience and have healing power. Many stated that rustic roads provide the country charm that attracts customers to businesses in the Ag Reserve ("agritourism opportunities"), such as farms, farm markets, orchards, stables, wineries, breweries, cideries, art studios, restaurants, and grocery stores. Avid bicyclists who regularly go for long rides on the rustic roads make up perhaps the single largest category of individuals who submitted testimony in support of the program. While many of these cyclists are residents of Montgomery County, we also heard from many in Virginia and the District of Columbia who value these roads as cycling routes and visit the county primarily because of the roads in our Ag Reserve.

We also heard from numerous individuals who noted that the roads provide opportunities for heritage tourism of all sorts. Some examples are the communities established by formerly enslaved individuals, one-lane bridges, stone walls lining the roads, and historic structures and features.

Several large-scale commodity farmers and organizations representing them testified about the importance of these roads as an "agricultural transportation network" that is critical for their farm businesses. While not expressly opposed to the Rustic Roads Program, many of them expressed concerns that the rustic status of many of the roads hindered their farm operations.

A few comments from some who strongly support the program note that there is currently polarization between stakeholder groups that they hope the current plan will alleviate.

---

## BACKGROUND INFORMATION

Before discussing the categories of road recommendations from the master plan, there is some background information that will inform some of the recommendations for individual roads in the



plan. This information is intended to address testimony submitted by the Montgomery County Department of Transportation (MCDOT).

### DEDICATED BUT UNMAINTAINED (DBU) ROADS

Montgomery County established a Dedicated But Unmaintained (DBU) Roads Program in 2009. The DBU program is the policy the county follows regarding road rights-of-way that have been dedicated for public use but for which the county has not accepted maintenance responsibility. A DBU road right-of-way is defined as a road that:

- Is dedicated for public use, usually by record plat,
- was intended to provide public access to multiple private properties,
- was not constructed to county standards,
- was never accepted by the county for maintenance, and
- is not maintained by the county.

Because roads on the DBU list have not been constructed to county standards, the county has not accepted maintenance responsibility for the roads. Instead, property owners adjacent to the road are responsible for maintenance until the road has been brought up to an acceptable standard. The county does not typically repair road surfaces or drainage facilities or provide snow clearing and ice treatment services along these roads. The DBU policy outlines steps by which property owners can petition for and pay for road improvements to bring them up to the necessary standard.

MCDOT proposes that existing rustic roads on the county's Dedicated But Unmaintained (DBU) Roads list be removed from the program and that no new roads on the list be added. (More information on this program and the current DBU Roads list can be found on the county's website [here](#).) MCDOT included the following roads from the plan in their list: Aitcheson Lane, Belle Cote Drive, Bentley Road, Old Orchard Road, and Poplar Hill Road.

MCDOT included one nominated and four existing rustic roads along with their comments about DBU roads. MCDOT states that continued inclusion in the program could limit property owners' ability to bring the road up to county standards and hinder property owners from transferring maintenance responsibility to the county.

Planning Staff recommends including all existing rustic roads and rustic road segments on the DBU list in the program but agrees that no roads in the DBU list be designated rustic in the future. Nominated Aitcheson Road should be designated rustic because the segment recommended as rustic is not on the DBU list. Planning Staff recommends a revised recommendation to remove the middle segment of Poplar Hill Road from the program since there is no longer a road in that section. Planning Staff had originally considered the former roadbed to be similar to other closed roads that are now hiking and biking trails but remain designated as rustic roads (see discussion of Park Roads below), but while addressing MCDOT's concerns about DBUs it became clear that Poplar Hill Road is unlike the other "trail roads." The other trail roads are formal multi-use trails owned and maintained by

Montgomery Parks, but there is no maintained trail in the removed section of Poplar Hill Road and the dedicated right-of-way is unmarked and unclear.

The central issue with the DBU roads is that they must be brought up to a county standard before the county will accept them for maintenance, and no specific county standard applies to rustic roads. Planning Staff recommends that the DBU policy be updated with context sensitive guidance on how an existing road on the DBU list can be brought up to a standard that MCDOT will accept.

## BRIDGES

Bridges have become one of the most debated topics of discussion for this master plan update. Currently, only a handful of bridges have been designated as significant features of rustic roads, but numerous bridges are recommended as new significant features. As a reminder, significant features are those features which, by County Code, must be preserved when the road is maintained or improved.

Executive Regulations provide more specific guidance regarding *maintenance* of bridges along rustic roads (whether significant features or not):

The Department of Public Works and Transportation [former name of MCDOT] must make bridge repairs in a manner that preserves the rural characteristics of the roadway and the bridge structure.

For maintenance of guardrails, which are frequently located adjacent to and across bridges:

If a guardrail is to be replaced, the Department must use a material that maintains the existing rustic appearance of the roadway. Guardrails must meet all applicable safety standards.

When *more substantial work* is required on a bridge along a rustic road, the Executive Guidelines state:

Bridge replacement or rehabilitation must be of a design and material which preserves or enhances the rustic appearance of the road. Bridges must be replaced at a scale and with materials similar to those of the previously existing structure. If a different design is required for environmental, economic, or safety reasons, new bridges must be of a design and material that complements or enhances the rustic appearance of the roadway. Correction of substandard approach road geometries must be made in character with existing unmodified portions of the roadway. All new or rehabilitated structures must be designed with adequate weight bearing capacity and horizontal clearances to accommodate emergency vehicles and agricultural equipment. Actual roadway surfaces on bridge decks must be compatible in width to the width of the unaltered roadway.

For bridges on exceptional rustic roads, the Executive Guidelines state:

Bridge replacement or rehabilitation must be of a design and material which preserves or enhances the rustic appearance of the road. Bridges must be replaced at a scale and with materials similar to those of the previously existing structure. If a different design is required for environmental or safety reasons, new bridges must be of a design and material that complements or enhances the rustic appearance of the road. On exceptional rustic roads, a new or rehabilitated deck should be no wider than the existing deck unless improvements are specifically needed for the transportation of agriculture related equipment, in which case the new or rehabilitated deck should be no wider than the existing approaches.

To summarize the above, regardless of whether a bridge is a significant feature, when routine maintenance work is carried out on a bridge on a rustic road, the repairs must preserve “the rural characteristics of the roadway and the bridge structure,” but not necessarily preserve the exact appearance of the bridge. When a bridge must be replaced or rehabilitated, “new bridges must be of a design and material that complements or enhances the rustic appearance of the roadway.” For regular rustic roads, the bridge deck “must be compatible in width to the width of the unaltered roadway,” whereas for an exceptional rustic road, the bridge deck width must be no wider than the existing deck unless it needs to be widened to accommodate agricultural equipment.

While bridges that have already been designated as significant features in the past are typically those with interesting design elements, most of the newly recommended bridges have a more “ordinary” appearance according to MCDOT, which suggests “that the plan identify what other objectives should be achieved when these less significant bridges are rehabilitated or reconstructed. MCDOT’s comments continue:

We agree that bridge replacements, when necessary, should to the extent feasible preserve the existing aesthetic. When it is not feasible to achieve current safety standards, however, other options may be necessary to consider. This could include realigning the road and constructing a new bridge that complies with current standards, preserving the existing bridge in-place for pedestrian and bicycle use. Another option may be to replace the bridge with a modern bridge but thoroughly documenting the existing/previous bridge to preserve its history.

Planning Staff agree with MCDOT that many of the newly recommended bridges are “ordinary” in appearance but agree with the Rustic Roads Advisory Committee (RRAC) that these narrow bridges make significant contributions to the character of the roads they are on. Staff intends to present each of the bridges recommended as significant features to the Planning Board during a future work session as part of our discussion on individual road recommendations.

Staff recommends retaining all bridges recommended as significant features in the plan. Staff agrees with the RRAC that realigning the road to build a new bridge (while retaining the old bridge for non-vehicular use) or using a modern bridge design (while “documenting” the current bridge) are not acceptable alternatives given the options available when bridgework must be completed. Staff also

recommends adding clarifying text to the master plan to explain that when a bridge is a significant feature and requires substantial work, MCDOT should coordinate with the RRAC to identify the visual characteristics of the bridge that are important to preserve.

## STATE ROADS AND PARK ROADS

MCDOT questions the inclusion of several state and M-NCPPC park roads in the program. MCDOT argues “that State roads are inherently regional in nature, and the State is not subject to County laws, potentially limiting the effectiveness of the Rustic designations.” This is in response to the requirement that a rustic road “is a narrow road intended for predominantly local use.” MCDOT reasons that the park roads, which are closed to vehicular traffic, function more as park trails than as roads.

Maryland’s State Highway Administration (SHA) and Montgomery Parks supports the inclusion of their roads in the program. While there isn’t a large effect from naming a state or park road rustic because it is not maintained by MCDOT, if a road meets the criteria, it should be designated rustic. Sec. 49-79 (b) of the County Code states: “State and park roads. The Executive must encourage the State Highway Administration and the County Parks Department to maintain and improve rustic roads owned by the State or Park Commission in a manner consistent with this Article.”

Staff agrees with the Rustic Roads Advisory Committee that there is no reason to remove the state and historic park roads from the program if they meet the criteria of a rustic road.

---

## ROADS WITH NO MAJOR CHANGES

Thirty-three of the 99 roads currently in the program have only minor changes that do not affect their designation in the program or change any significant features. These roads are listed in Table 1. Many of these roads had outdated history or traveling experience sections, especially with respect to roadside features that are no longer in existence or had a change to their historic designation. In many cases, the only change to the text is the addition of a historic resource number.

*Table 1. Roads with No Major Changes*

- |                    |                      |                          |
|--------------------|----------------------|--------------------------|
| • Bentley Road     | • Elmer School Road  | • Montevideo Road        |
| • Big Woods Road   | • Haines Road        | • Moore Road             |
| • Black Rock Road  | • Hawkes Road        | • Mount Nebo Road        |
| • Budd Road        | • Hipsley Mill Road  | • Mountain View Road     |
| • Burdette Lane    | • Jerusalem Road     | • Prices Distillery Road |
| • Cattail Road     | • Jonesville Road    | • Purdum Road            |
| • Clopper Road     | • Kingsley Road      | • Rileys Lock Road       |
| • Club Hollow Road | • Kingstead Road     | • Sugarland Lane         |
| • Comus Road       | • Meeting House Road |                          |



- Trundle Road
- Violettes Lock Road
- West Offutt Road
- West Willard Road
- Whites Ferry Road
- Whites Store Road
- Zion Road

## DISCUSSION

Very few comments were received about roads with no major changes. Staff will discuss any comments received at the work session.

### NOMINATED RUSTIC ROADS

Twenty-five roads were nominated to be added to the program and were assessed as part of this update.

Six of these roads were initially considered for rustic or exceptional rustic classification but were removed from consideration early in the planning process. Three of the six roads were not considered further because they are private roads, and only public roads can be classified as rustic. Another road, made up of two short stretches of Georgia Avenue between the new Brookeville Bypass and the Brookeville town limits, was nominated, but the bypass will need to be completed before traffic counts and crash histories can be studied. (The segment of Georgia Avenue within the town limits of Brookeville is outside the jurisdiction of Montgomery Planning.)

Finally, two of these six roads were removed from further study for other reasons. Although Barnesville Road west of the nominated section is already a rustic road, the nominated eastern section carries a lot of non-local traffic and does not have a particularly rustic appearance. Awkard Lane was also determined to not have a sufficiently rustic appearance early in the process.

*Table 2. Nominated Roads Removed from Consideration*

Road Name	Area	Extents	Notes
Allnutt Road	Poolesville	Westerly Road to end of road	Not a public road
Awkard Lane	Cloverly	Holly Grove Road to end of county maintenance	Lacks sufficient rustic character
Barnesville Road (MD 117)	Boys	Bucklodge Road to Clarksburg Road (MD 121)	Carries mainly non-local traffic and lacks sufficient rustic character
Conoy Road	Barnesville	Barnesville Road to end of road	Not a public road
Georgia Avenue (MD 97)	Brookeville	Segments between Brookeville Bypass and Brookeville Town limits	Reconsider for program after completion of the Brookeville Bypass
The farm road	Sandy Spring	Brooke Road to end of road	Not a public road

After removing these six roads, 19 nominated roads or road segments were further studied to determine if they should be added to the program. Out of the 19 nominated roads not removed from consideration, only Riding Stable Road, the nominated section of Brighton Dam Road, and one portion of Kings Valley Road are not recommended as rustic or exceptional rustic. Recommendations for the nominated roads are shown in Table 3. A symbol with three yellow diamonds appears at the top of the road profiles for roads added to the program by this plan.

*Table 3. Recommendations for Nominated Roads*

<b>Road Name</b>	<b>Area</b>	<b>Extents</b>	<b>Recommendation</b>
Aitcheson Lane	Burtonsville	Riding Stable Road to end of county maintenance	Rustic
Brighton Dam Road (Extension to existing rustic road)	Brookeville	Bordly Drive to New Hampshire Avenue (MD 650)	Do not designate rustic
Brown Church Road	Damascus	Ridge Road (MD 27) to end of county maintenance	Rustic
Bucklodge Road (MD 117)	Boyd's	Darnestown Road (MD 28) to Barnesville Road (MD 117)	Rustic
Dickerson Church Road	Dickerson	Dickerson Road (MD 28) to Dickerson Road [loop]	Rustic
Dickerson School Road	Dickerson	Big Woods Road to end of road	Rustic
Emory Church Road	Olney	Georgia Avenue (MD 97) to end of county maintenance	Rustic
Greenbridge Road	Brookeville	Georgia Avenue (MD 97) to end of county maintenance	Exceptional Rustic
Halterman Road	Laytonsville	Hipsley Mill Road to end of county maintenance	Rustic
Holly Grove Road	Cloverly	Norwood Road to end of county maintenance	Rustic
Holsey Road	Damascus	Ridge Road (MD 27) to end of county maintenance	Rustic
Kings Valley Road	Damascus	Ridge Road (MD 27) to Bethesda Church Road	Rustic (Stringtown Road to Bethesda Church Road) Do not designate rustic (Ridge Road to Stringtown Road)
Lewisdale Road	Clarksburg	Prices Distillery Road to Frederick County Line	Rustic
Mount Carmel Cemetery Road	Brookeville	Georgia Avenue (MD 97) to end of county maintenance	Rustic
Mullinix Mill Road	Damascus	Damascus Road (MD 108) to Howard County Line	Rustic
Nicholson Farm Road	Dickerson	Dickerson Road to Mouth of Monocacy Road	Rustic

Road Name	Area	Extents	Recommendation
Riding Stable Road	Burtonsville	Sandy Spring Road (MD 198) to Prince George's County Line	Do not designate rustic
Seneca Road	Potomac	River Road to Rileys Lock Road	Rustic
Thurston Road	Comus	Old Hundred Road (MD 109) to Frederick County Line	Rustic

## DISCUSSION

### No New Rustic Roads

Some members of the agricultural community suggested that no new roads be added to the program because the current rustic roads are not being adequately maintained. The maintenance of these roads and of the vegetation along them were mentioned so frequently in the comments that we will discuss the issue as part of another work session. However, by law, rustic roads are to receive regular maintenance just as any other road in the county would, so the frequency of county maintenance should have no bearing on the classification of these roads, or vice versa.

### Aitcheson Lane

Part of Aitcheson Lane is on the county's Dedicated But Unmaintained (DBU) roads list, which is discussed below. The segment recommended as rustic is not on the DBU roads list.

### Awkard Lane

Of the six roads removed from consideration early in the planning process—that is, before the road's history, traveling experiences, and environment sections were written and maps created, only one has been promoted for inclusion in the program by area residents. Several people in the Cloverly area, including some along Holly Grove Road, support designating Awkard Lane as a rustic road. Awkard Road is a relatively short dead-end road that can only be accessed from Holly Grove Road, which is recommended as rustic in the master plan. Most people suggesting Awkard Lane also be designated rustic group these two roads together as "the Holly Grove community." The current plan draft does not recommend Awkard Lane as rustic because it does not have much rustic character, looking more like a disorganized suburban street than a road with sufficient rustic character to be added to the program, whereas Holly Grove Road retains more rustic character. Staff continues to oppose designating Awkard Lane rustic.

### Holsey Road

Holsey Road is currently recommended as a new rustic road. Several people with historic ties to Holsey Road have asked that we not designate the road rustic. They feel this would thwart their future

plans to build houses on the road by making it difficult or impossible to widen the road, provide modern drainage facilities, and streetlights, to name a few improvements mentioned.

Holsey Road seems to be a clear choice when it comes to designating the road rustic due to its width, alignment, and scenic views across farm fields. The land through which it passes is zoned RC (Rural Cluster) for the most part, which only allows one house per five acres. At the end of the road, the zoning changes to AR (Ag Reserve), which only allows one house per 25 acres.

There are no plans by the county to extend sewer service in this area due to the distance from existing infrastructure, low-density zoning, and the location within the Patuxent Primary Management Area, which serves to protect the water quality in the drinking water reservoirs through land use and impervious surface controls. It is unrealistic to expect more than a few additional houses along the road, although there is a 50-plus-acre site on the north side of the road that could be developed into a 10-house neighborhood.

Although those who testified do not currently reside on Holsey Road, their testimony indicates they have been in contact with those who do and that the residents of Holsey Road have similar concerns about the classification of the road as rustic. They are concerned about safety and wonder why their road can't be improved like the other roads in Damascus.

Staff continues to recommend Holsey Road as rustic. Holsey Road meets all the criteria of a rustic road and a rustic designation has not prevented others from building houses along other rustic roads. If safety concerns are identified on the road, a rustic designation does not preclude road improvements to address those concerns.

---

## ROADS TO BE REMOVED FROM THE PROGRAM

Two roads currently in the program no longer meet the criteria for a rustic classification and should be reclassified. These roads are shown in Table 7.

*Table 4. Roads Currently Recommended to Be Removed from the Program*

Road Name	Master Plan	Current Designation
Boswell Lane	Potomac	Rustic
Link Road	Cloverly	Rustic

## DISCUSSION

No comments were submitted in opposition to removing these two roads from the program. Keeping these roads in the program diminishes the truly rustic roads in the program and implies that roads with a more suburban character are rustic. The Cloverly Civic Association supports removing Link Road.

The master plan currently recommends that Boswell Lane be reclassified as a primary residential street and Link Road to be “unclassified.” However, the recommendations for all roads and road segments that are not recommended as rustic or exceptional rustic are being evaluated under the newly approved Complete Streets Design Guide. New recommendations will be discussed at a future work session.

If these roads remain in the program, new road profiles will need to be written.

## ROADS WITH NEW ROAD PROFILES

Of the 31 roads added to the program by area master plans, 27 were added to the program with incomplete descriptions. The roads with incomplete descriptions are shown in the order in which they were added to the program in Table 5. The master plan that added the roads to the program and relevant page numbers from the plan are included in the table.

*Table 5. Rustic Roads with Incomplete Descriptions*

Road Name	Classification	Extents	Notes
<i>Clarksburg Master Plan and Hyattstown Special Study Area (1994)</i> (pp. 126-130 and appendix pp. 34-42)			
Frederick Road (MD 355)	Rustic	Between recommended Hyattstown Bypass intersections	In Hyattstown Historic District
Old Hundred Road (MD 109)	Rustic	I-270 to MD 355	Road south of I-270 was added by 1996 RRFMP – Recommended for removal north of Peach Tree Road
<i>Cloverly Master Plan (1997) (pp. 53-58)</i>			
Avoca Lane	Rustic	Entire length	Change to exceptional rustic
Batson Road	Rustic	Entire length	
Bryants Nursery Road	Rustic	Entire length	
Johnson Road	Rustic	Entire length	Eastern extent is also being revised
Link Road	Rustic	Entire length	Recommended for removal
Oak Hill Road	Rustic	Entire length	
Old Orchard Road	Rustic	Entire length	
<i>Fairland Master Plan (1997) (pp. 96-99)</i>			
Belle Cote Drive	Rustic	Entire length	Change to exceptional rustic
Dustin Road	Rustic	West of US 29	Eastern extent is also being revised
Santini Road	Rustic	Entire length	



Road Name	Classification	Extents	Notes
<i>Sandy Spring/Ashton Master Plan (1998) (pp. 54-57)</i>			
Haviland Mill Road	Rustic	Brinkwood Road to county line	
Tucker Lane	Rustic	Ednor Terrace to MD 108	Change to exceptional rustic
<i>Potomac Subregion Master Plan (2002) (pp. 110-117)</i>			
Berryville Road	Exceptional Rustic	Seneca Road to Darnestown Road	
Boswell Lane	Rustic	Piney Meetinghouse Road to Glen Mill Road	Recommended for removal
Glen Mill Road	Rustic	Red Barn Lane to Circle Drive	
	Exceptional Rustic	Red Barn Lane to Glen Road	
Glen Road	Rustic	Query Mill Road to Piney Meetinghouse Road	
	Exceptional Rustic	Piney Meetinghouse Road to Beekman Place	
Poplar Hill Road	Rustic	Berryville Road to Parev Terrace	
Query Mill Road	Rustic	Esworthy Road to Turkey Foot Road	Change part of road to exceptional rustic—see road profile for details
South Glen Road	Exceptional Rustic	Glen Road to Deepglen Drive	
Stoney Creek Road	Rustic	Travilah Road to River Road	
Turkey Foot Road	Rustic	Darnestown Road to Travilah Road	Southern extent is also being revised
<i>Olney Master Plan (2005) (pp. 99-102)</i>			
Batchellors Forest Road	Rustic	1,200 feet east of Georgia Ave to Doctor Bird Road	Western extent is also being revised
Brighton Dam Road	Rustic	Town of Brookeville boundary to Bordly Drive	Change to exceptional rustic
Triadelphia Lake Road	Rustic	Entire length	Change to exceptional rustic
<i>Great Seneca Science Corridor Master Plan (2010) (pp. 81, 85)</i>			
Game Preserve Road	Rustic	Clopper Road (MD 117) to Frederick Avenue (MD 355)	

## DISCUSSION

Complete road profiles were written for each of these roads and a blue page symbol appears at the top of the profile. The most important part of each profile is a list of significant features that must be protected when the roads are improved or maintained. Planning Staff reviewed the language in the master plan that added the road to the program to find any significant features mentioned in the text.

Additional significant features were added based on notes compiled over the years from field visits and from online resources. Members of the Rustic Roads Advisory Committee also suggested adding or removing features and provided additional details for the profiles, especially the traveling experiences.

Two roads lacking a complete description, Link Road and Boswell Lane, are recommended for removal from the program as discussed above. Another road, Old Hundred Road (MD 109), was only missing a description in the short section between I-270 and Frederick Road (MD 355), but this section is part of the segment between Peach Tree Road and Frederick Road (MD 355) recommended for removal from the program; the remainder of Old Hundred Road retains its rustic designation.

At the work session, Planning Staff will discuss comments received on rustic roads with new road profiles in groups based on which area master plan added the road to the program. This will assist with understanding the geographic location of the roads in the county and in relation to one another.

MCDOT expressed concerns about the following roads for which new road profiles have been written and recommends that Montgomery Planning reconsider retaining all or part of these roads in the Rustic Roads Program: Batchellors Forest Road, Frederick Road, and Game Preserve Road. Planning Staff will discuss MCDOT's comments on these roads at the work session.

---

## ROADS WITH EXTENT CHANGES

For many roads in the program, changes to the road network or to features along the road require that the extents—that is, where the rustic designation begins and ends along a road—be changed. In a few cases, the designated extent of a rustic road was unclear or ambiguous in a previous master plan and simply needs to be clarified. Changes to the extents are typically very minor and are described within the recommendations for the individual roads. The roads with recommended changes to one or both extents are shown in Table 6. In some cases, the roads have been included in the list for a technical correction to the road description rather than for an actual removal from or addition to the program. The individual road maps show where the rustic classification applies and the rustic road's extents are shown in the road characteristics table within each road profile. The extents of all roads in the program are listed in the Roadway Classification Tables in the master plan. A purple ruler symbol appears at the top of road profiles with extent changes.

*Table 6. Extent Changes for Existing Rustic Roads*

Road Name	Extent Changing	Old Extent	New Extent
Batchellors Forest Road	Western	Georgia Avenue (MD 97)	Washington Christian Academy entry drive
Brookeville Road	Eastern	Georgia Avenue (MD 97)	New roundabout at Brookeville Bypass (Georgia Avenue)

<b>Road Name</b>	<b>Extent Changing</b>	<b>Old Extent</b>	<b>New Extent</b>
Dustin Road	Eastern	Columbia Pike (U.S. 29)	Roundabout at Old Columbia Pike
Hoyles Mill Road	Eastern	Ag and Open Space plan boundary (RDT zone boundary at the time)	Park gate near the eastern end of the road
Hughes Road	Southern	River Road (ambiguous)	Hunting Quarter Road
Johnson Road	Eastern	Norwood Road	High school entry drive
Mount Ephraim Road	Northern (correction to road name)	Incorrectly followed Sugarloaf Mountain Road	Frederick County line (at a different crossing point)
Mouth of Monocacy Road	Eastern	Bridge over Little Monocacy River	End of county maintenance
Old Hundred Road (MD 109)	Northern	Frederick Road (MD 355)	Peach Tree Road
Schaeffer Road	Eastern	“New” park entrance for South Germantown Recreation Park	Burdette Lane
Slidell Road	Northern	10 Mile Creek plan boundary	Comus Road
Stringtown Road	Southern	Piedmont Road	Cedarbrook Community Church entry drive
Sugarloaf Mountain Road	Both (correction to road name)	Incorrectly included as part of Mount Ephraim Road	Mount Ephraim Road to Frederick County line
Turkey Foot Road	Southern	Travilah Road	New roundabout at Travilah Road
West Harris Road	Northern (correction to road name)	Frederick County Line	Mount Ephraim/Sugarloaf Mountain Road

## DISCUSSION

Several comments from groups and individuals opposed to a few of the recommended extent changes were received. We also received testimony in favor of adding one additional segment to an existing rustic road.

The extent change reductions recommended in this plan are due to either a technical correction to a road segment being made or because development or other transportation projects have occurred that have changed the character and use of a road segment. The reductions are typically short. When a road segment is removed from the program, the removed segment gets reclassified as some other county road type. This road type determines certain improvements that are required when development occurs along that road segment. Removing the non-rustic sections makes it easier for improvements to be made along those segments as necessary given the change in their use and character.

Planning Staff will discuss any comments received on road segments recommended for removal at the work session. This includes recommendations from MCDOT that Montgomery Planning consider removing the first 500 feet from both Meeting House and Bentley roads from Olney-Sandy Spring Road (MD 108) because they do not appear to meet the criteria for inclusion in the program.

### Future Improvements to Rustic Roads

Planning Staff agree that it is unfortunate that the rustic character of Brookeville and Schaefer roads was not preserved according to County Code. We agree with the RRAC that there is a risk to removing roads or segments of roads from the program when they have been modernized. Such action may send a signal that it is okay to change a rustic road because then it can be removed from the program and there will no longer be constraints along that section of road. It is hoped that more care will be taken in the future to respect County Code when undertaking projects along rustic roads. Additionally, with improved coordination from MCDOT and stakeholders at recommended recurring coordination meetings, we hope to avoid situations like this in the future. These two projects should not be viewed as acceptable outcomes.

### Gregg Road

The Rustic Roads Advisory Committee and one additional commenter suggested extending the rustic designation of Gregg Road from its intersection with Riggs Road (the current western end of the rustic designation) to Zion Road. It is unclear why this segment, about one-third of a mile in length, was omitted when the road was designated rustic. It continues the rustic character of the existing rustic segment and completes a link between two other existing rustic roads, Riggs and Zion roads.

Staff recommends adding the western segment of Gregg Road to the program as a rustic road. (The remainder of Gregg Road, already rustic, is recommended as exceptional rustic.)

---

### ROADS WITH A CLASSIFICATION CHANGE FROM RUSTIC TO EXCEPTIONAL RUSTIC

Exceptional rustic roads are rustic roads that meet all the criteria for a rustic designation, but also meet three additional standards. Before classifying a road as an exceptional rustic road, the County Council must find that the road or road segment:

- contributes significantly to natural, agricultural, or historic characteristics;
- has unusual features found on few other roads in the county; and
- would be more negatively affected by improvements or modifications to the physical characteristics of the road than would most other roads in the Rustic Roads Program.

After additional review, many roads that were added to the program as rustic roads appear to meet the criteria for classification as exceptional rustic. The roads recommended to be reclassified from rustic to exceptional rustic are shown in Table 7 and are marked in the road profiles with a red crossover symbol at the top of the profile.

*Table 7. Rustic Roads Recommended as Exceptional Rustic*

<b>Road Name</b>	<b>Master Plan</b>	<b>Extents of Exceptional Rustic Designation</b>
Avoca Lane	Cloverly	Entire road: Oak Hill Road to end of county maintenance
Belle Cote Drive	Fairland	Entire road: Kruhm Road to end of county maintenance
Brighton Dam Road	Olney	Current rustic section (Town of Brookeville to Bordly Drive)
Davis Mill Road	Rustic Roads	Blunt Road to southern driveway at 22905 Davis Mill Road
Elton Farm Road	Rustic Roads	Entire road: Howard Chapel Road to end of road
Gregg Road	Rustic Roads	Riggs Road to Georgia Avenue (MD 97)
Hunting Quarter Road (clarification)	Rustic Roads	Entire road: Hughes Road to River Road
Hyattstown Mill Road	Clarksburg / Rustic Roads	Frederick Road (MD 355) to Prescott Road
Old Bucklodge Lane	Rustic Roads	Entire road: Bucklodge Road (MD 117) to White Ground Road
Peach Tree Road	Rustic Roads	Barnesville Road to Old Hundred Road (MD 109)
Prescott Road	Rustic Roads	Entire road: Frederick Road (MD 355) to Hyattstown Mill Road
Query Mill Road	Potomac	Glen Road to Esworthy Road
Riggs Road	Rustic Roads	Zion Road to Gregg Road
Triadelphia Lake Road	Olney	Entire road: Georgia Avenue (MD 97) to boat ramp parking lot at end of road
Tschiffely Mill Road	Rustic Roads	Entire road: River Road to gate at Seneca Stone Mill
Tucker Lane	Sandy Spring-Ashton	Ednor View Terrace to Ashton Road (MD 108)
Wildcat Road	Rustic Roads	Brink Road to Davis Mill Road and Davis Mill Road to Watkins Road

## DISCUSSION

No comments were received regarding classification changes. Recommended new classifications for any road or road segment being removed from the program will be discussed at another work session.

### ROADS WITH REVISIONS TO SIGNIFICANT FEATURES

Updates to significant features are recommended for several existing rustic roads that already have well-defined significant features. New significant features have been identified for many roads, while others are being removed. Some significant features have minor revisions. The roads in the program



that already have well-defined significant features but are recommended to have features added, removed, or revised are shown in Table 8. As with other roads in the program, the updated profiles will also contain other text changes and revised maps. A green checklist symbol has been added next to the list of significant features in the road profiles when there have been revisions to the list.

Roads where bridges are being added as significant features are designated in the table, as well as MCDOT's assessment of the bridge as either Significant or Ordinary. Bridges are discussed in more detail in the Background Information section above, but Planning Staff wanted to call special attention to the roads where one or more bridge is included as a new significant feature.

*Table 8. Roads with Changes to Significant Features*

<b>Road Name</b>	<b>Master Plan</b>	<b>Bridge Being Added as SF</b>	<b>MCDOT "rating"</b>
Barnesville Road	Rustic Roads	Y	Significant
Beallsville Road	Rustic Roads		
Brookeville Road	Rustic Roads		
Burnt Hill Road	Rustic Roads / Damascus		
Davis Mill Road	Rustic Roads		
Edwards Ferry Road	Rustic Roads	Y	Ordinary
Gregg Road	Rustic Roads	Y	Ordinary
Howard Chapel Road	Rustic Roads	Y	Ordinary
Hoyles Mill Road	Rustic Roads		
Hunting Quarter Road	Rustic Roads		
Hyattstown Mill Road	Clarksburg / Rustic Roads		
Martinsburg Road	Rustic Roads	Y	Ordinary
Mouth of Monocacy Road	Rustic Roads	Y	Ordinary
Moxley Road	Rustic Roads		
Old Hundred Road (MD 109)	Clarksburg / Rustic Roads		
Old River Road	Rustic Roads		
Pennyfield Lock Road	Rustic Roads	Y	Significant
Prescott Road	Rustic Roads		
River Road (exceptional segment)	Rustic Roads	Y	Ordinary
River Road (rustic segment)	Rustic Roads	Y	Ordinary
Rocky Road	Rustic Roads		
Sugarland Road	Rustic Roads	Y	Ordinary
Sugarloaf Mountain Road	Rustic Roads		
Swains Lock Road	Rustic Roads	Y	Ordinary
Sycamore Landing Road	Rustic Roads	Y	Ordinary
Wasche Road	Rustic Roads		
West Hunter Road	Rustic Roads		
West Old Baltimore Road	Clarksburg / Rustic Roads / 10 Mile Creek		
Westerly Road	Rustic Roads		
White Ground Road	Rustic Roads / MARC Rail	Y	Both
Wildcat Road	Rustic Roads	Y	Ordinary

## DISCUSSION

A few comments were received regarding changes to, additions of, or removal of significant features in addition to the testimony regarding bridges discussed at length above. Additional (non-bridge) recommendations for revisions to the significant features included in the current plan draft are shown in Table 9.

*Table 9. Suggested Changes to Significant Features from Testimony*

Road Name	Suggested Change
Glen Mill Road	In the rustic section of the road, add the hedgerows mentioned in the Environment section as a significant feature
Kings Valley Road	Add “historic alignment including a jog in the road at Kingstead Road”
Lewisdale Road	Add hedgerows to significant features as mentioned in traveling experience and as located on map
Mount Carmel Cemetery Road	Add the mature trees along the south side of the road as a significant feature
Mouth of Monocacy Road	Include the B&O Railroad Viaduct as a significant feature
West Hunter Road	Add language to the significant features and also add to the map: “roadside vegetation and mature forest east of Hilliard Farm on south side of road”

Planning Staff does not support adding the above suggestions as significant features for various reasons, but in general it is because the requested features do not rise to the level of “significant” or because they are unnecessary. Each of the requests above will be discussed at the work session.

Future work sessions will focus on plan organization, maintenance issues, composition and duties of the Rustic Roads Advisory Committee (RRAC), and any other items the Planning Board identifies to discuss.

## ATTACHMENTS

- A. Summary of public comments
- B. All written public testimony received

## Rustic Roads Functional Master Plan Update – Summary of Testimony Received on the Public Hearing Draft

### Introduction

The Planning Board Hearing on the Rustic Roads Functional Master Plan Update was held on November 17, 2022 at the Wheaton Headquarters Auditorium. The Planning Board voted to keep the record open until Friday, December 9, 2022.

The names of those who submitted written or oral testimony on the Public Hearing Draft are included in the first table below. If the testimony was provided on behalf of an organization, that information has been included in the table.

Following the names of those testifying are several tables summarizing the comments received and Planning staff's response to those comments.

### Individuals Providing Testimony

Name	Group Represented	Resident	Notes
Tiffany Ahalt	National Road Heritage Foundation (NRHF)	No	Board, Vice President of NRHF
Carol Allen	Individual	Germantown	Poplar Hill Road resident
James Russell Allnutt	Individual	Poolesville	Homestead Farm (via Lori Larson)
Francoise "Frankie" Andre and Apostol Vassilev	Individuals		Berryville Road resident
Robert Baker	Individual	Dickerson	Farmer along Mouth of Monocacy Road (Deere Valley Farm); raises beef cows, grows grain and hay on 2500 acres (via Samantha Baker)
Indhu Balasubramaniam	Individual		Farmer along West Harris Road that grows South Asian vegetables, chickens (for eggs), and goats (for meat) for a 40-member CSA
Ginny Barnes	West Montgomery County Citizens Association (WMCCA)		Vice President
Carole and Paul Bergmann	Individuals	Clarksburg	Residents of Prices Distillery Road
David Berman	Individual	Potomac	
Nancy Bliss	League of Women Voters of Montgomery County, MD (LWVMC)		Co-president of LWVMC (see "LWVMC" in lists below instead of individual name)
Bill Branson	Individual		Cyclist
Tina Thieme Brown	Individual	Barnesville	Barnesville Road resident and board member of Sugarloaf Citizens Association
Darcy Buckley	MCDOT		As staff coordinator for the RRAC, submitted testimony from Laura Van Etten, RRAC Chair
Wade Butler	Individual		Butler's Orchard (via Lori Larson)

Name	Group Represented	Resident	Notes
Robert Butts	Individual		Waredaca Farm (via Lori Larson)
Robert Butz	Individual		Farmer along Sugarland Road (via Lori Larson)
David Cammarota	Individual	Gaithersburg	Cyclist
Tina Cappetta	National Park Service (NPS)		Superintendent, Chesapeake & Ohio Canal National Historical Park
Peter Ciferri	Alder Energy Systems, LLC		Intend to build solar array near Zion and Gregg roads (via Helen Pauler, McMillan Metro, P.C.)
Robert (Bob) Cissel	Montgomery Agricultural Producers (MAP)		Director of Association (via Mike Scheffel, Officed of Ag)
Bruce Clarke	Individual	Ashton	Tucker Lane resident
James R. Clifford	Individual	Poolesville	Farmer (Bally Cliff Farm) and land use attorney
Peter Coan	Individual	No	Cyclist from DC
Ed Comer	Individual	Bethesda	Cyclist
Timothy H. Cupples	Montgomery County Department of Transportation (MCDOT)		Deputy Director for Transportation Policy at MCDOT
Anne Davies	Individual		
Reid Detchon	Individual		
Bee Ditzler	League of Women Voters of Montgomery County, MD (LWVMC)		Chair, Transportation & Land Use Committee of LWVMC (see “LWVMC” in lists below instead of individual name)
Patricia Douville	Individual	No	Cyclist
Geralyn Drymalski	Individual	Germantown	
Joe Durishin	Individual		Cyclist
Peter Eeg	Individual		Veterinarian and resident of West Old Baltimore Road.
Steven Findlay	Sugarloaf Citizens Association (SCA)	Dickerson	President of SCA
Warren Fleming	Damascus Connection Committee of Montgomery County Maryland (DCC)	Damascus	Relative of the Holsey Family, former Historic Preservation Commissioner, and co-founder of Damascus Heritage Society
Kevin Foster	Individual		
Steve Friedman	Individual	Chevy Chase	Cyclist
Robert Goldberg	Individual	Gaithersburg	Davis Mill Road resident who served two terms on the RRAC
Jack Goldman	Individual	Derwood	Cyclist
Susan Golonka	Washington Women Outdoors (WWO)	Bethesda	Bicycle Chair of WWO
Ellen Gordon	Individual	Dickerson	Horse farmer off Comus Road; former member of two agritourism advisory committees
Dwayne Haines	Individual	Brookeville	Cyclist

Name	Group Represented	Resident	Notes
Susan Hanson	Friends of Rural Roads (FRR)	No	Spokesperson for FRR, a rural roads advocacy group from Frederick County
Thomas Hartsock	Individual	Clarksburg	Beef cattle and hay farmer on 103 acres and former farmer member of the RRAC
Pat Hermans	Individual	Poolesville	
Jessica Hirschhorn	Individual	Yes	Member of five cycling groups.
Ron and Lynda Honberg	Individuals	Rockville	Cyclists
Barbara Hoover	Individual	Potomac	RRAC member representing West Montgomery County Civic Association
Brigid Howe	Individual		
Anne Hyman	Potomac Pedalers Touring Club (PPTC)		
Thomas Isidean	Individual	No	Cyclist from DC
Michael Jamison	Agricultural Preservation Advisory Board (APAB)		Chairman of APAB (via Mike Scheffel, Office of Ag)
Michael Jamison	Individual	Poolesville	Farmer (Jamison Ag and Turf); grows corn, wheat, soybeans, and sod (via Lori Larson)
Patrick Jamison	Individual		Farmer (via Lori Larson)
Susan Jamison	Individual	Poolesville	
Ellen Jimerson	Individual		
Melanie and Steve Kurimchak	Individuals	Clarksburg	Prices Distillery Road residents
Lori Larson	Individual	Potomac	Submitted testimony from numerous farmers (“Rustic Roads from the Eyes of the Farmer”)
Doug Lechliden	Agricultural Advisory Committee (AAC)	Laytonsville	Chair of AAC
Linda Lewis	Individual	Dickerson	Lewis Orchards (via Lori Larson)
Carol Linden	Individual	Bethesda	Cyclist
Paula Linthicum	Individual		(via Lori Larson)
Lonnie Luther	Individual	Damascus	Farmer (via Lori Larson)
Rev. Gloria Lyles	Individual		Born and raised on Holsey Road
Ellen and Endel Mann	Individuals	Silver Spring	
Christopher Marston	Individual	Silver Spring	Former RRAC member
Judy Mauldin	Holly Grove Historical Preservation Association (HGHPA)		Founder of HGHPA
Tim McGrath	Individual	Dickerson	One of the Supervisors for Montgomery County Soil Conservation District (via Lori Larson)



Name	Group Represented	Resident	Notes
Eileen McGuckian	Montgomery Preservation, Inc. (MPI)		President of MPI
Dolores and Gregory Milmoe	Individuals	Poolesville	Farm owners; Dolores was on a task force to create the Rustic Roads Master Plan in the mid-1990s
Jean Thomas Moore	Holly Grove Historical Preservation Association (HGHPA)		2nd signatory on letter from Judy Mauldin; lifelong resident of the Holly Grove community
Sarah Navid	Individual	Rockville	
Joan Oppel	Individual	No	Arlington, VA resident who travels to Montgomery County just to bike along rustic roads and hike on nearby trails
Scott Plumer	Darnestown Civic Association (DCA)		
Jim Quinn	Individual	Damascus	Bikes 100-200 miles a week
Quentin Remein	Cloverly Civic Association (CCA)		Mr. Remein is president of CCA.
Sarah L. Rogers	Heritage Montgomery (HM)		Executive Director of HM
Lawrence Rubey	Individual		Cyclist
Leslie Saville	Individual	Silver Spring	Former M-NCPPC planner and former M-NCPPC member (non-voting) of the Rustic Roads Advisory Committee (RRAC)
Miriam Schoenbaum	Boys Historical Society (BHS)	Boys	President of BHS
Dan Seamans	Rustic Roads Advisory Committee (RRAC) And as Individual		Submitted RRAC recommendation on Gregg Road extent change, but also submitted individual testimony
Cindy Snow	League of Women Voters of Montgomery County, MD (LWVMC)	Rockville	Office Manager for LWVMC – submitted testimony on behalf of Nancy Bliss, Vicky Strella, and Bee Ditzler
Eric Spates	Individual		Farmer (via Lori Larson)
Randy Stabler	Individual		Farmer and former RRAC member.
Vicky Strella	League of Women Voters of Montgomery County, MD (LWVMC)		Co-president of LWVMC (see “LWVMC” in lists below instead of individual name)
Anne Sturm	Individual		Peach Tree Road resident who has installed a “nest box trail” for Eastern bluebirds along several rustic roads.
Robert K. Sutton	Historic Preservation Commission (HPC)		Chair of HPC (submitted via Kacy Rohn, Historic Preservation staff)
Caroline Taylor	Montgomery Countryside Alliance (MCA)	Poolesville	Executive Director of MCA and resident of two rustic roads
Patricia Thomas	Holly Grove Historical Preservation Association (HGHPA)	Cloverly	One of the directors of HGHPA
Jane Thompson	Individual		
Bev and Dick Thoms	Individuals	Dickerson	Sheep farmer/felt maker with studio along Big Woods Road
Robert J. Tworowski	Individual	Olney	Batchellors Forest Road resident and former RRAC member

<b>Name</b>	<b>Group Represented</b>	<b>Resident</b>	<b>Notes</b>
Laura Van Etten	Rustic Roads Advisory Committee (RRAC)	Dickerson	Sheep/equestrian farmer and Chair of the RRAC
Michael Weigand	Individual	Barnesville	West Harris Road resident
Robert W. and Elizabeth R. Wilbur	Individuals	Boyds	Robert is a former RRAC member
Rose Ziegler	Individual		Relative of the Holsey Family
Robin Ziek	Individual	Sandy Spring	Bentley Road resident, former Historic Preservation staff member, and member of the Rustic Roads Advisory Board when the program was being drafted

## General Comments

Topic	Name(s)	Comments	Response
General Support of the Rustic Roads Program	Tiffany Ahalt (NRHF) Francoise Andre and Apostol Vassilev Robert Baker Ginny Barnes (WMCCA) Carole and Paul Bergmann David Berman Tina Thieme Brown Ed Comer Timothy H. Cupples (MCDOT) Reid Detchon Peter Eeg Steven Findlay Pat Hermans Barbara Hoover Anne Hyman (PPTC) LWVMC Melanie and Steve Kurimchak Christopher Marston Eileen McGuckian (MPI) Dolores and Gregory Milmoe Sarah Navid Scott Plumer (DCA) Quentin Remein (CCA) Leslie Saville Miriam Schoenbaum (BHS) Robert K. Sutton (HPC) Caroline Taylor (MCA) Jane Thompson Robert J. Tworkowski Robert W. and Elizabeth R. Wilbur	<p>We support the program and would like to see it to be continued, strengthened, and/or expanded. Please continue to protect and maintain these roads. Some reasons provided: One of the county's most significant assets; enhanced quality of life; recreational opportunities (hiking, bicycling, horse riding); historic resources; agricultural resources. These roads are an important part of the Agricultural Reserve and should be preserved.</p> <p>"[I]f our vistas, cultural heritage, farming, tourism are compromised – all of which the rustic roads program supports – these attributes will be lost – and we will have deprived the following generations from these valuable resources/opportunities and choices for the future." (Robert J. Tworkowski)</p>	Acknowledged.

Topic	Name(s)	Comments	Response
General Support (Video Links)	RRAC Jessica Hirschhorn	Recommended videos: <i>Every Road has a Story</i> : <a href="https://youtu.be/e1gc4F3LNmM">https://youtu.be/e1gc4F3LNmM</a> <i>Heritage Montgomery</i> : <a href="https://youtu.be/fjAWGz1GGoQ">https://youtu.be/fjAWGz1GGoQ</a> <i>Ride for the Reserve: Metric</i> : <a href="https://www.relive.cc/view/vMv8VRRRedP6">https://www.relive.cc/view/vMv8VRRRedP6</a>	Acknowledged.
General Opposition on roads included in the Rustic Roads Program	Laura Van Etten (RRAC)	“There has always been opposition expressed by a small and vocal minority of the farming community, but the roads benefit the vast majority of farmers as well as the significant numbers of recreational users.”	Rustic roads must be safe for all users and all modes of transportation. As stated in the 1996 plan and repeated in the current plan, these roads must both be capable of moving farm equipment and products and preserve the rustic characteristics of the roads.
General Support with a Better Balance Between Stakeholders	Lori Larson Robert J. Tworowski	There is currently polarization between stakeholders. Ms. Larson testified her support for the ability of everyone to enjoy rustic roads and our heritage while also supporting our farming community. Mr. Tworowski has observed a “triangulation” between the farming community, MCDOT, and the RRAC and believes the outstanding items that have been consistently discussed for years could be addressed with better and more consistent communication.	The plan provides a recommendation for regular meetings among stakeholder groups that is intended to address this issue, possibly as a recurring agenda item at regularly scheduled RRAC Meetings.
General Support – Plus Offer to Coordinate Efforts	Susan Hanson (FRR)	FRR appreciates the help they were given by (former) Staff and the RRAC in designing Frederick County’s Rural Roads Program. Some initiatives aligned with a strong rural roads program including an effort to plant five million trees, protecting stream buffers, Vision Zero, Complete Streets, and Maryland Byways Context Sensitive Solutions. FRR “look(s) forward to working together to build networks and loops that value and showcase our slow roads.”	Planning staff are happy to help with coordinated efforts between neighboring counties regarding rustic roads and associated programs.
General Support – Vision Zero Darnestown	Scott Plumer (DCA)	The Darnestown Civic Association supports and has been involved with the Rustic Roads Program since the program’s inception. The DCA formed a road task force in 2019, and in 2020, started a project, Vision Zero Darnestown, to promote safe roads in the area of Darnestown.	Acknowledged.

Topic	Name(s)	Comments	Response
General Support – Tranquility / Healing Power	David Cammarota Anne Davies Joe Durishin Geraldyn Drymalski Pat Hermans Anne Sturm Bev Thoms	Rustic roads provide a peaceful experience and have a healing power. “The peacefulness and relaxation associated with riding on these rustic roads is impossible to overvalue.”	Acknowledged.
General Support – Clean Roads	Pat Hermans	Many of these roads are sponsored and are kept clean and free of debris by the sponsoring companies or by those who live along the roads.	Acknowledged.
Attract Customers / Country Charm	Bill Branson Ellen Gordon Pat Hermans Jessica Hirschhorn Joan Oppel Bev Thoms	Rustic roads provide the country charm that attracts customers to businesses in the Ag Reserve. Examples: art studios, restaurants, grocery stores	Acknowledged. Planning staff coordinates regularly with the Office of Ag and Department of Permitting Services to support agricultural activities and agritourism.
Attract Customers / Agritourism	Tina Thieme Brown David Cammarota Reid Detchon Patricia Douville Geraldyn Drymalski Susan Golonka (WWO) Thomas Isidean Carol Linden Christopher Marston Dolores and Gregory Milmoie Sarah L. Rogers (HM) Caroline Taylor (MCA)	Rustic roads strengthen rural businesses. They are a regional asset and economic draw for the region. Examples: farms, farm markets, orchards, stables, wineries, breweries, cideries, art studios, heritage tourism.  According to Ms. Taylor, “The Reserve's agricultural demographics are shifting toward more diverse, smaller, sustainable, consumer visited businesses. These businesses benefit from the rustic byways, the getting there and back experience.”	Acknowledged. Planning staff coordinates regularly with the Office of Ag and Department of Permitting Services to support agricultural activities and agritourism.
Important Corridors	Thomas Hartsock	Preservation of the corridors through which the roads pass is more important than preserving the roads in their current condition. Changes to keep the roads useable, especially for farm equipment might be painful from a preservation perspective. There needs to be compromise.	Acknowledged. It is the intent of this plan and County Code that the roads in the program provide for movement of agricultural equipment, preserve the rustic character and features of the roads, while remaining safe for all modes of transportation.



Topic	Name(s)	Comments	Response
Agricultural Transportation Network	Robert Cissel (MAP) Michael Jamison (APAB) Patrick Jamison Tim McGrath	The purpose of these roads is to serve the agricultural community by providing a transportation network for farm goods, allowing the safe movement of large equipment between farms, and safely serving the needs of those who live along them. People coming out for a pleasure drive or a bike ride should not take priority.	It is the intent of this plan and County Code that the roads in the program provide for movement of agricultural equipment, preserve the rustic character and features of the roads, while remaining safe for all modes of transportation.
Bicycling	David Berman Bill Branson David Cammarota Peter Coan Ed Comer Reid Detchon Patricia Douville Joe Durishin Steve Friedman Jack Goldman Susan Golonka (WWO) Dwane Haines Jessica Hirschhorn Anne Hyman (PPTC) Thomas Isidean Carol Linden Joan Oppel Lawrence Rubey	Rustic roads provide outstanding bicycling routes that are beautiful year-round. They are slow and safe and provide an amazing experience, with farm fields and barns; stone walls; historic sites, communities, and bridges; views of Sugarloaf Mountain; and mature trees.  Rustic roads offer a safe harbor from aggressive drivers. Bicyclists patronize many of the small business along rustic roads during their travels.	Acknowledged.
Bicycling – Suggested Improvements	Reid Detchon Scott Plumer (DCA)	I recommend additional sign posting, traffic calming measures, and other bicycle-friendly improvements along the rustic roads. 'Perhaps better and standardized signage at major ingress and egress points on all our rustic roads needs to be more emphatic than the standard bicycle "right to use the full lane" signage. Perhaps: "Blind Spots, Pedestrians, Bicycles, beautiful vistas, and rustic interests ahead – please drive slowly and enjoy!" <Fines and points tripled.>'	The plan supports additional traffic calming measures where necessary.
Bicycling – New Roads	Bill Branson	I find the old roads are safer than the new roads, where there is a variety of concrete curbing around intersections and sidewalks that is difficult to navigate while still watching traffic.	Non-rustic roads are not included in this plan, but your comments have been relayed to the bicycle planning team.

Topic	Name(s)	Comments	Response
Bridges – Poor Condition	Patrick Jamison	The weight limit on some bridges won't support fire trucks or school buses. Some of the bridges should be condemned and replaced.	MCDOT has a program in place to inspect and repair/replace bridges as needed.
Bridges – Terminology and Design Exceptions	Barbara Hoover Leslie Saville Laura Van Etten (RRAC) Robin Ziek	<p>Without consistent protection, many existing scenic bridges will be lost to modern replacements that are lacking in character. In relation to bridges, replace the word reconstruct with preserve and rehabilitate. Include the Secretary of the Interior's definition for the preservation of bridges and other resources on roads.  <a href="https://www.ecfr.gov/current/title-36/chapter-I/part-68">https://www.ecfr.gov/current/title-36/chapter-I/part-68</a></p> <p>Would like MCDOT and SHA to pursue design exceptions for bridges. Design exceptions have not been accepted well by SHA under the current (Hogan) administration.</p>	This plan encourages maintaining the character of the road whenever bridgework is undertaken. It is up to MCDOT to determine the best action to take on any given bridge, even if occasionally this means an entire bridge must be replaced. The Secretary of the Interior's Standards website indicates "reconstruction" as the last option and it is specific to historic structures. It is a technique that "will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property." Very few bridges on rustic roads have been designated historic.
Development in the Agricultural Reserve	Ed Comer Joe Durishin Peter Eeg Steve Friedman Jack Goldman Ron and Lynda Honberg LWVMC Jim Quinn Lawrence Rubey	Continue to restrict development in the Ag Reserve and maintain the commitment to preserve this land for farming, hikers, and bicyclists. Preservation of productive farmland is crucial.	The Ag Reserve has been in place for over 40 years and there is no intent to change the pattern of development activity in the Ag Reserve. The Rustic Roads Functional Master Plan is not a land use plan and it does not determine development activity in the Ag Reserve.

Topic	Name(s)	Comments	Response
Dedicated But Unmaintained Roads Policy	Timothy H. Cupples (MCDOT)	<p>“Dedicated But Unmaintained: Roads appearing both in the plan and on the list of Dedicated But Unmaintained roads (DBU) include the entire length or portions of Aitcheson Lane, Belle Cote Drive, Bentley Road, Old Orchard Road, and Poplar Hill Road.</p> <p>According to the DBU Policy adopted by Council, the County does not maintain roads on the DBU list. The adjacent property owners, as the successors of those who originally built the road, are responsible for their maintenance. This can represent a financial burden for the adjacent property owners. Under the DBU Policy, the County can only assume maintenance responsibility for those roads after those adjacent property owners bring the road into compliance with current County standards.</p> <p>The continued inclusion of these roads in the Rustic Roads program could limit the property owners’ ability to bring the roads up to County standards, hindering them from transferring maintenance responsibilities to the County.”</p>	<p>The segment of Aitcheson Road that is being recommended as rustic is within the area of county maintenance. Belle Cote Drive is currently rustic and has been recommended as exceptional rustic. Bentley Road, Old Orchard Road, and Poplar Hill Road contain short segments on the DBU list. Staff intends to discuss this item with the Planning Board at a work session.</p>
	Robin Ziek	<p>“The DBU portions of Bentley Road are still open to the public and provide a sense of the past. These are truly ‘rustic.’” Ms. Ziek notes that MCDOT did not bring up the DBU issue when Bentley Road was designated rustic in 2015 and that the County Council gave its approval. Ms. Ziek fears that the rustic roads will become fragmented “and therefore put the entire public experience of our history at risk.”</p>	
	Laura Van Etten (RRAC)	<p>The RRAC argues that the recommended rustic segment of Aitcheson Road is within the area of county maintenance and that Poplar Hill Road receives county maintenance. Roads that were already designated rustic prior to the creation of the DBU policy should never have been put on the DBU list. Since the creation of this policy, no rustic roads have been added to the list. ‘One road, Bentley Road, was confirmed with Randy Paugh (then-Chief, Pavement Management Section, MCDOT) as “publicly maintained to the last house” prior to being added to the Rustic Roads program.’</p>	

Topic	Name(s)	Comments	Response
Drainage / Safety	Robert Cissel (MAP) Michael Jamison Patrick Jamison Linda Lewis Eric Spates	Water runs into and collects on the road because of bad drainage, which can lead to hydroplaning. When it freezes, it is even more unsafe and is destructive to road surfaces.	Current County Code and Executive Regulations are intended to maintain safe roads. Any unsafe conditions should be brought to the attention of MCDOT, who will assess the situation. The plan recommends regular meetings with stakeholders along these roads, and this would be a good example of something that could be discussed.
Farmer Representation	Leslie Saville	Ms. Saville provided a summary of farmers who testified at the public hearing, indicating that several of them are represented by other groups that also testified, including some who testified as both individuals and separately as chair of a committee.	Acknowledged. Staff welcomes feedback on the plan, and we have listed whether individuals testified as an individual or a member of an organization.
Future of Farming	Dolores Milmoe Leslie Saville Laura Van Etten (RRAC)	<p>Ms. Van Etten provided numerous statements regarding the changing demographic of farming in the county. The RRAC feels that making changes to the roads to accommodate a small number of commodity farmers “would produce long-lasting destruction to address a short-term problem.”</p> <p>Ms. Milmoe described how much agriculture has changed in the county in the last 30 years, with the number of commodity farmers falling by more than half and the vast majority of famers producing table crops/products for direct human consumption. “The future of MoCo farming is not for us to compete with Iowa for commodity crops, but rather to serve the large and lucrative local markets and Metro regions with table crops.”</p> <p>Ms. Milmoe and Ms. Saville provided statistics from the Census of Agriculture to make their case about the number of farmers doing commodity farming versus those engaged in other types of agriculture.</p>	As stated in the County Code, rustic roads must be safe for all modes of transportation. It is MCDOT’s responsibility to maintain public roads regardless of road classification. The demographics of the user of the road is not a factor in determining how a road is maintained. The roads need to be able to accommodate the farm equipment needed for all farms in our rural and agricultural areas of the county.
Gravel Dust	Linda Lewis	The dust from a gravel road can make your crop unsellable.	MCDOT is the agency tasked with maintaining roads. MCDOT is expected to address this comment at a work session.

Topic	Name(s)	Comments	Response
Guidelines for Foliage and Tree Maintenance on Rustic Roads	Robert Cissel (MAP) Doug Lechliden (AAC) Randy Stabler	Concerns that the September 8, 2021 “Guidelines for Foliage and Tree Maintenance on Rustic Roads” agreement between RRAC and MCDOT will delay maintenance of vegetation along rustic roads until the RRAC has had time to evaluate the situation and provide feedback to MCDOT. MCDOT should be able to perform this maintenance without running it by the RRAC.	MCDOT is the agency tasked with maintaining roads. Planning staff recommends reviewing these guidelines at a work session with the idea of incorporating them into the Executive Regulations on the maintenance of rustic roads.
	Laura Van Etten (RRAC)	“The Committee developed guidelines that call for trimming exactly as these farmers asked for. For the last two years, these roads have been trimmed regularly. The farmers speak as though we are standing in their way, but in fact, we have been getting things done for these farmers. We visited the roads and provided the specific details MCDOT needed to get these trees trimmed. The farmers in MAP do not submit the information needed to have their trees trimmed, so we are doing it for them.”	
Historic Significance / Heritage Tourism	Tina Thieme Brown Patricia Douville Geraldyn Drymalski Susan Golonka (WWO) Jessica Hirschhorn Barbara Hoover Thomas Isidean Carol Linden Christopher Marston Sarah L. Rogers (HM) Robert K. Sutton (HPC) Laura Van Etten (RRAC)	Rustic roads wind through historically significant areas and past or over historic sites. Examples: communities established by formerly enslaved individuals, one-lane bridges, stone walls lining the roads. There are many benefits to preserving and managing historic roads: heritage tourism, economic development, improved safety and efficiency, restoration of historic structures and features, civic pride. They were identified as heritage resources in the original Heritage Montgomery Management Plan in 2002.	Acknowledged. This plan will help in preserving significant features along rustic roads.
Horse Riders	Laura Van Etten (RRAC)	“328 of the County’s 558 farms are horse farms. Riders are frequently seen along our rustic roads. Boarders at local horse farms stop before and after riding to visit restaurants, markets, and equipment shops, purchasing local food and goods.”	Acknowledged.

Topic	Name(s)	Comments	Response
Intersection Visibility / Roadside Vegetation / Safety	Patrick Jamison Dolores Milmoe	<p>Mr. Jamison expressed concerns about roadside vegetation near road intersections, where it is sometimes very difficult to see if vehicles are coming. Some trucks have long hoods, requiring a driver to blindly pull out into the road just to see if anyone is coming.</p> <p>Ms. Milmoe agrees that clear lines of sight are important, but states that “there are many instances of clearing well beyond the roadway edges.”</p>	MCDOT is responsible for maintaining roadside vegetation. These roads must remain safe for all users. Anyone experiencing a safety issue should contact MCDOT to resolve the problem. Recurring problem areas should be discussed at the recommended stakeholder meetings.
Maintenance / Disconnect on How Regulations are Followed	Robert Cissel (MAP) Michael Jamison Michael Jamison (APAB) Doug Lechliden (AAC) Dolores Milmoe	The farming community is concerned about the lack of maintenance along rustic roads and the failure of the county to provide the maintenance necessary to “allow for safe travel by motorized vehicles and agricultural equipment. Maintenance will be provided at a level no lower than existed at the time of designation, while still preserving the rustic qualities of the road.” County Code Article 49 requires that maintenance of rustic roads “does not preclude improvements to promote safety or movement of farm equipment.” There seems to be a disconnect between the RRAC, MCDOT and the agricultural community regarding how the regulations are to be followed when maintaining rustic roads. Rustic Roads are the “beltway” for the farming community. Trimming along rustic roads needs to be scheduled in a systematic manner rather than by emergency.	<p>As mentioned in the comments, maintenance and safety are both included in County Code as well as the Executive Regulations. It is hoped that the recommended stakeholder meetings will help alleviate the perceived disconnect between the various groups.</p> <p>MCDOT will provide information about maintenance work that will be discussed at a work session.</p>
	Laura Van Etten (RRAC)	“Criticisms heard about the Program are actually about the desire for additional routine maintenance rather than the current complaint-driven maintenance process used by MCDOT on all roads.”	

Topic	Name(s)	Comments	Response
Maintenance – Basic	James Russell Allnutt Wade Butler Robert Butz Michael Jamison Patrick Jamison Lori Larson Linda Lewis Lonnie Luther Dolores Milmoe Scott Plumer (DCA) Quentin Remein (CCA)	<p>Rustic roads lack basic maintenance procedures. This includes the road surfaces, which are frequently filled with potholes, and the tree canopy, which isn't high enough or trimmed back far enough. Debris from fallen trees also needs to be cleaned up. Sometimes the rough road surface can even bruise fruit on its way to market. The county has failed the farmers by not providing proper maintenance.</p> <p>Ms. Milmoe suggests that MCDOT “exchange the word ‘maintenance’ for ‘stewardship’ in their job description.” She provided a photo showing “scorched earth over-clearing” where the vegetation was cleared down to the bare soil and another showing a repaving effort that led to asphalt sliding down a stream bank.</p> <p>The CCA requested that the plan include a section identifying the importance of maintenance on these roads, comparing it to an historic home that often needs costly repairs to maintain its appearance.</p>	See above.
Maintenance – Cyclists	Ed Comer Jack Goldman Anne Hyman (PPTC) Jim Quinn	The roads in Montgomery County are in far worse condition than any of the surrounding counties. Ms. Hyman notes that she agrees with Mr. Cissel that rustic roads need to be maintained better to allow for farm equipment to pass, but also wanted to note that a bottom-up approach needs to be used in maintenance. Cyclists do not need to dodge trash and roadkill.	See above.
Maintenance with Intention	Steven Findlay (SCA)	These roads must be preserved with intention, with adequate maintenance and continued monitoring of traffic patterns and changes.	Acknowledged.
Movement of Farm Equipment / Roadside Vegetation / Road Width / Safety	Robert Butz Michael Jamison Michael Jamison (APAB) Patrick Jamison Susan Jamison Doug Lechliden (AAC) Linda Lewis Paula Linthicum	The Ag Reserve was created to protect farmland and agriculture, not rustic roads. Many of the rustic roads are too narrow to allow for the safe movement of farm equipment, tractor trailers, school buses, and fire trucks, especially when encountering another vehicle on the road. Some drivers get impatient and try to pass, even when it isn't safe. Roadside vegetation must remain trimmed back from the road to allow more room for large vehicles to pull over without causing damage. The lack of shoulders compounds the problem. Repairing damaged parts can cost from hundreds to several thousand dollars.	See discussion above regarding maintenance and safety. Perhaps it would be possible to provide laybys in critical areas. This topic will be discussed at a work session.



Topic	Name(s)	Comments	Response
Maintenance of Roadside Vegetation – Technique	Dolores Milmoe	Montgomery County should ban the use of vertical bush hogs [photo provided in testimony], which can create a “war zone look,” noting that Virginia has banned this technique.	MCDOT and SHA are responsible for maintenance of roadways in the county and determine the appropriate equipment to use.
Native Plants	Indhu Balasubramaniam Dolores Milmoe	Ms. Balasubramaniam suggests that more trees and native plants be planted along rustic roads.  Ms. Milmoe suggests MCDOT become familiar with the Federal Highway Administration’s <a href="#">"Roadside Revegetation, An Integrated Approach to Establishing Native Plants"</a> if they are not already.	Although there is not a program specific to planting trees and native plants along rustic roads, M-NCPPC and the county have several programs to promote planting trees.
Nature: Environmental Benefit / Health Benefit / Hiking Opportunity	Patricia Douville Geraldyn Drymalski Barbara Hoover Thomas Isidean Carol Linden Christopher Marston Dolores and Gregory Milmoe Joan Oppel	These narrow roads help protect water quality in our streams and reservoirs. The help preserve the natural environment for the health and enjoyment of all. They provide access to numerous hiking trails.	Acknowledged.
Nature: Wildlife	Tina Thieme Brown Geraldyn Drymalski Pat Hermans Robert Goldberg Susan Golonka (WWO) Anne Sturm	Rustic roads help protect habitat for numerous wild animals. Examples: Eastern bluebirds, tree swallows, barn swallows, eagles, turkeys, herons, piliated woodpeckers, foxes, coyotes, snakes, squirrels, deer, bears, hawks, groundhogs	Acknowledged.
New Rustic Roads	Dwayne Haines LWVMC Sarah L. Rogers (HM)	Support for adding the new roads to the program. Designating additional roads is good for the environment and for quality of life.	Acknowledged.
Notification	Quentin Remein (CCA)	Need more notification to the residents that live on rustic roads.	Notifications were sent to Civic Associations and HOAs in the plan area as required for master plans. We do not send letters to all individuals within a plan area, which in this case covers approximately 50% of the county’s land area. The Planning Board extended the public record closing date by an additional 12 days to allow more time for comments.

Topic	Name(s)	Comments	Response
No New Rustic Roads	Robert Cissel (MAP) Michael Jamison Michael Jamison (APAB) Doug Lechliden (AAC)	Do not add more roads to the Rustic Roads Program until the existing rustic roads are maintained in a way that allows for the safe passage of agricultural equipment and other vehicles. The RRAC should slow down the push to add 19 new roads to the program. If the RRAC is concerned about their growing workload, the addition of these roads will make matters worse.	The status of these roads as rustic or not rustic should have no bearing on maintenance procedures.
Public Hearing Location	Brigid Howe	Request to hold the public hearing in a community that is more accessible to the areas of the county where most of the rustic roads are. Or consider scheduling a second meeting for public input.	Planning Board Chair Zyontz provided a response on November 16, 2022. There are numerous legal and practical limitations that make offsite meetings challenging, such as the staff required for recording and live streaming the meetings and ensuring the meetings are accessible to all.
Public Outreach regarding the Rustic Roads Program	Caroline Taylor (MCA)	More needs to be done in terms of public outreach to promote and enhance the Rustic Roads Program, including videos, newsletters, and public education on how to safely use the roads. This needs to be a collaborative effort.	As part of its duty to promote the program, the RRAC has already developed several relationships with various organizations. The RRAC promotes the program at various events throughout the year, such as the annual Ride the Reserve festivities.
Roads Selected for Inclusion in the Rustic Roads Program	Lori Larson	Why are some roads included in the program when they are connectors? A significant number of roads are being proposed for inclusion in the program. Not all roads seem to meet the criteria for inclusion in the program.	Staff has reviewed all roads recommended as rustic and has determined they meet the criteria.
Roadside Vegetation and Trees (Positive)	Indhu Balasubramaniam Bev and Dick Thoms	Trees provide shade, provide attractive scenery, and minimize the deterioration of the asphalt surface.	Acknowledged.
Rustic Roads Advisory Committee (RRAC) – General Duties	Laura Van Etten (RRAC)	RRAC members are unpaid volunteers who put in an overwhelming number of hours in support of the program. These numbers were increased working on this plan update: driving most of the roads, including all nominated roads; writing traveling experiences; suggesting significant features; making corrections. We also perform the following regular duties: making meeting agendas; doing research; writing letters, statements, testimony, and other documents; hold on-site meetings with development application applicants; hear from applicants at RRAC meetings; provide letters for subdivision and conditional use applications; hold on-site meetings with MCDOT maintenance crews.	Staff intends to discuss the composition and duties of the Committee at a work session as part of the discussion on the request to increase the number of members by two. (See below.)

Topic	Name(s)	Comments	Response
	Robert J. Tworkowski	The Rustic Roads Program needs a full-time paid staff person to handle the program with the support of volunteers. Running the program is a full-time job for several of the Committee's members, and their duties take time, money, and resources to be successful.	This item can be discussed at a work session when discussing the duties and workload of the RRAC.

<p>Rustic Roads Advisory Committee (RRAC) Membership (In Favor)</p>	<p>Ginny Barnes (WMCCA) Timothy H. Cupples (MCDOT) Laura Van Etten (RRAC) Leslie Saville Caroline Taylor (MCA)</p>	<p>Expand membership of the Rustic Roads Advisory Committee from seven to nine members. There is a tremendous amount of work that must be done and the current committee members (volunteers) are stretched thin trying to keep up. Also, remove the requirement that the three farmer members earn at least half their income from farming. It is difficult to find full-time farmers who have time to spend on the Committee. “The current income test favors long-established commodities farmers. Our goal is to be able to attract a diverse group of farmers, particularly drawing from the growing pool of immigrant farmers who are not traditional farmers and who grow vegetables for the ethnic market.” Most of these farmers cannot afford farmland in the county and must have another income source to make a living. Having additional members would help the Committee meet the county’s Racial Equity and Social Justice Goals.</p> <p>Ms. Saville stated that since 1989, there has never been an African American or Latino voting member on the committee.</p> <p>Ms. Taylor stated that in addition to commodity farmers, the Committee needs to include table crop production farmers on the Committee. These farmers may not meet the income requirement, but their voices are needed as a part of the program.</p>	<p>Staff does not support expanding membership from 7 to 9 members, nor do we support removing the income requirement for farmer members.</p> <p>The workload of the Committee will be a topic of discussion at a work session. Some of the RRAC’s duties are defined in county code, while some of the Committee’s current duties are less well defined. The current workload is unusual in large part due to the current planning effort and is unlikely to be repeated in the future because most roads in the county that qualify as rustic have already been identified. While the histories will continue to be updated as more information becomes available, we do not anticipate the same to be true for significant features and travel experiences.</p> <p>However, if membership were to be increased, the proposed language is too vague, and does not ensure additional members would come from underrepresented groups, as suggested.</p> <p>Additionally, the income requirement is consistent with both the Agricultural Advisory Committee and Agricultural Preservation Advisory Board. If the advisory committee is expanded to 9 members, staff recommends retaining the three farmer members that meet the current income requirement and the additional two members be farmer members without an income requirement.</p> <p>Regardless, the existing RRAC membership should also be evaluated to potentially add diversity to the RRAC.</p>
---	--	---	--

Topic	Name(s)	Comments	Response
			Any changes to the RRAC's membership will require an update to county code to implement.
Rustic Roads Advisory Committee (RRAC) – Requested Text Change	Leslie Saville Laura Van Etten (RRAC)	Ms. Van Etten stated, “We ask that if language about Committee membership is included in the Plan, that our view be included in the Equity section, describing the lack of diversity that has resulted from the Committee’s current membership requirements, and that the Implementation chapter recommend the changes above.” Ms. Saville echoed Ms. Van Etten’s request.	This request will be considered if it is determined that the membership should be expanded.

Topic	Name(s)	Comments	Response
Rustic Roads Advisory Committee (RRAC) Membership (Opposed)	Robert Cissel (MAP) Kevin Foster Michael Jamison Michael Jamison (APAB) Susan Jamison Doug Lechliden (AAC) Tim McGrath Dan Seamans Randy Stabler Lori Larson	<p>Do not expand the membership of the RRAC or eliminate the income requirement for farmer members. This will further diminish the voice of working farmers to advocate for the needs of the agricultural community. Current RRAC members do not understand the challenges farmers are facing on these roads. It would be better to change the requirements to require that at least one member of the Committee be a commodity farmer who moves large equipment from field to field. As Ms. Jamison states, “Given the large number of acres zoned agriculture, it is imperative that large scale grain farmers be afforded road conditions which make their work as safe as possible for themselves and for the other people on the roads,” and therefore it is imperative that such farmers have a meaningful voice on the Committee.</p> <p>Mr. Cissel pointed out that many committees in the county consists of five members and expressed that it is not the responsibility of the RRAC to conduct site visits to help MCDOT determine the roads that need trimming or maintenance.</p> <p>Mr. Jamison stated that adding 19 rustic roads to the program would be an overburden to the program.</p> <p>Mr. Seamans, a current member of the RRAC, does not agree with the RRAC that membership should be expanded (unless the number of farmers is increased to 4 of 9 members) or the income requirement for farmer members be dropped. He also specifically questions adding text stating that the new members “represent[] the geographical, social, economic, recreational and cultural concerns of the residents of the County” because this precludes having one of the two new members be the 4th farmer member. Mr. Seamans believes “[t]he Committee did not have adequate time to fully review, research or understand the long-term effects of the changes” before making their decision.</p>	Staff does not recommend any changes to the composition of the Committee. We intend to discuss the matter with the Planning Board at a work session.

Topic	Name(s)	Comments	Response
Rustic Roads Advisory Committee (RRAC) – General Support	James R. Clifford	The RRAC protects the roads and viewsheds while balancing their preservation duties with the responsibility of keeping the roads passable by oversized farm equipment.	Acknowledged.
	Eileen McGuckian (MPI) Robert J. Tworkowski	“We commend the RRAC for its foresight, wisdom, and dedication.” “Their time, energy and unwavering commitment – I believe is underappreciated within the County system.”	Acknowledged.
	Robert W. and Elizabeth R. Wilbur	“One of us, Robert, has had the honor of serving on the Rustic Roads Advisory Committee. Based on that experience, we have to say that many of the statements made to the Planning Board by commodity farmers concerning the advisory committee and the rustic roads program do not ring true. Committee members are quite sensitive to the needs of farmers and recognize their importance and value to the county. Many times during his tenure, attempts by the committee to engage commodity farmers in efforts to understand and address their concerns were rebuffed.”	Acknowledged.



Topic	Name(s)	Comments	Response
Rustic Roads Advisory Committee – Response to Opposition to Changes	Laura Van Etten (RRAC)	<p>“Adding two positions has been criticized by a small number of farmers in testimony, based upon a perception that their proportion of representation on the Committee will be diluted. Farmers have many representative groups providing input such as Office of Agriculture, Ag Advisory Committee, Ag Preservation Advisory Board, Soil Conservation District, Montgomery Ag Producers (private lobbying group) and Montgomery County Farm Bureau (private lobbying group), in addition to their representation on RRAC.”</p> <p>The RRAC also provided statistics regarding the number of farms in the county and how many are farmers as a primary occupation. The RRAC believe that expanding membership and eliminating the income requirement for farmers would allow for a more diverse and inclusive group. The RRAC notes, “On the Ag Advisory Committee, the great majority of farmer-members are not required to meet this income test. Only 3 of this Committee’s 12 farmers must meet that test. If the Committee which is established to represent agriculture does not have all farmer-members meeting that test, there is no reason that farmer-members of RRAC should have to meet that test.”</p>	Different committees have different areas of responsibility, and only the RRAC has a direct advisory role on rustic roads. The functioning of these roads is critical for all farmers, including commodity farmers; it is important that they have a voice regarding the maintenance of these transportation corridors and the policies that guide them.
Rustic Roads Advisory Committee (RRAC) Staff Support	Robert Goldberg	It is very important that dedicated and competent staff be assigned to help the RRAC carry out their assigned duties.	Acknowledged.
Rustic Roads Advisory Committee (RRAC) - Promotion	Laura Van Etten (RRAC)	Our logo appears on our letterhead, brown street name signs, hats, and bumper stickers. We have a tent, banner, table covers, and photo-boards to promote the program at events. We partner with Heritage Montgomery to educate the community.	We will consider mentioning the logo to the text and showing the logo.
Brown Signs	Barbara Hoover	The RRAC and MCDOT created a special brown street sign to distinguish rustic roads from others in the county. These signs help travelers and assist farm businesses aiming to attract day visitors.	We will consider adding a photo of the brown street sign.

Topic	Name(s)	Comments	Response
Safety and Speed (Positive)	Ginny Barnes (WMCCA) Tina Thieme Brown Anne Davies Ellen Gordon Thomas Isidean Christopher Marston Dolores and Gregory Milmoe Bev and Dick Thoms Laura Van Etten (RRAC)	These narrow, winding roads encourage slower driving. There are few roads in the county that can be safely shared by cars, bicyclists, and pedestrians. (Combination of narrow widths, curves, roadside vegetation, overhead canopy, driveways)	Acknowledged.
Safety and Speed (Negative)	Wade Butler Bruce Clarke Michael Jamison (APAB)	Increased traffic from expanding agritourism exacerbates an already stressed road network and creates additional safety hazards. Many people drive too fast on the roads, and there is no lighting at night. Police presence should be increased on these roads. You won't find many pedestrians on these roads because they are so unsafe.	Safety issues along a rustic road should be discussed with other stakeholders at the recommended regular meetings. MCDOT will be expected to provide status updates on previous issues raised.
Safety and Speed at Intersections with State Roads	Scott Plumer (DCA)	"We are concerned about our Rustic Roads that terminate on state roads, especially those with high speed limits. The transitions can be difficult, sight limited, and often on grade." Example: Turkey Foot Road at MD 28.	Any safety concerns along any road or intersection in the county should be raised with MCDOT and SHA. According to County Code, safety improvements are allowed along rustic roads.
Safety and Preservation	Laura Van Etten (RRAC)	"There has always been tension within MCDOT about these roads; they are being preserved, and they do not meet modern engineering standards. To address this, from the Program's inception, the roads have been subject to review based upon their crash experience rather than engineering standards."	Crash data is a part of the criteria used to determine if a road should be included in the rustic roads program or if safety issues need to be addressed. From our recent crash data analysis, it has been determined most rustic roads are safe, and if there is a crash history, a vast majority have occurred where a rustic road meets a road with another classification.
Safe Routes to School	Scott Plumer (DCA)	Safe routes to school on rustic roads is one of our top three concerns.	Being designated as rustic does not preclude necessary safety improvements as noted in County Code. MCDOT will be expected to provide status updates at stakeholder meetings.
Scenic Beauty	Robert Baker Ellen Gordon Thomas Isidean Bev Thoms	Rustic roads provide scenic vistas.	Acknowledged.

Topic	Name(s)	Comments	Response
Separate Budget Item	Randy Stabler	There needs to be a separate budget item for the maintenance of rustic roads.	Agreed. Both the RRAC and AAC are submitting letters supporting such action as part of the ongoing budget process. Planning staff has asked the Office of Agriculture to encourage groups it supports to do the same.
Snow Emergency Routes	Patrick Jamison	Snow emergency routes should not be classified rustic.	The classification of a road has no bearing on how it is maintained, so it shouldn't matter if a snow emergency route is rustic.
Support for the Comments of Others	Robert W. and Elizabeth R. Wilbur	"We are writing to express our support for the Rustic Roads Master Plan Update with modifications as outlined in the written submissions and testimony of members of the Rustic Roads Advisory Committee. We also concur with the comments in support of the update offered by Caroline Taylor, Executive Director of Montgomery Countryside Alliance."	Acknowledged.

## Comments on Plan Content

Topic	Name(s)	Comments	Response
General Plan Organization – New Chapter for Policy Recommendations	Sarah L. Rogers (HM) Leslie Saville	<p>Create a chapter for policy recommendations and have it placed in the plan before the Individual Road Profiles. Remove policies from the Implementation Section and place them in the Policy Chapter.</p> <p>According to Ms. Rogers and Ms. Saville, the Planning Board directed Planning staff to create this section prior to the Road Recommendations during the presentation of the Working Draft in October. The idea is that the Road Recommendations would logically follow from the policy recommendations. Ms. Rogers is asking when this change will be made.</p>	<p>It is unclear how relocating policy recommendations to an earlier plan chapter improves the organization of the plan. Staff has included any recommendations to change policy in the Implementation chapter because they are items that need to be implemented.</p> <p>Staff reviewed the October 6, 2022, presentation of the Working Draft to the Planning Board and only one item (the recommendation for regular stakeholder meetings) was flagged as potentially being a policy issue, and the Commissioner who raised the question directed staff to consider moving, if it makes sense, but that it was up to staff to determine the best location in the plan for the recommendation.</p>

Topic	Name(s)	Comments	Response
Complaints and Operational Items	Leslie Saville Caroline Taylor (MCA)	Remove complaints and operational items from the plan since they do not belong in a long-range plan.  Ms. Taylor provided a recent example where the county's 311 resource was used to efficiently resolve a signage and vegetation issue on Mount Nebo Road.	All master plans discuss existing conditions and typically describe current problems the plan is intended to resolve.
Introduction – Historic Public Assets	Leslie Saville	State at the beginning of the plan and repeat several times in appropriate sections how important these “unique, priceless, outstanding, historic public assets” are.	Staff believes that the plan sufficiently describes the benefits of rustic roads.
Introduction – Heritage Montgomery	Sarah L. Rogers (HM)	We support and appreciate the description of Heritage Montgomery in the plan.	Acknowledged.
Introduction – Related Plans, Programs, and Policies	Timothy H. Cupples (MCDOT)	The DBU policy may be appropriate to discuss in this section.	See comments above on the DBU policy.
Introduction – Special Protection Areas (p. 15)	Timothy H. Cupples (MCDOT)	‘Last word - Change "possible" to "feasible." Possible is fiscally unconstrained, which of course is not practical. Feasible, however, does imply resource constraints.’ [The full sentence in question: “In SPAs, land-use controls such as limiting imperviousness, planting forest buffers, and requiring enhanced erosion control help ensure that impacts from development activities are mitigated as much as possible.”]	Staff will review the language the with Planning Board and make appropriate changes if deemed necessary.
	Laura Van Etten (RRAC)	The RRAC does not agree that this change is appropriate in this context of SPAs, stating, “The use of the word ‘feasible’ would allow MCDOT to use improper maintenance procedures at their own discretion.”	

Topic	Name(s)	Comments	Response
Introduction – Roadway Character (p. 17)	Timothy H. Cupples (MCDOT)	<p>‘2nd Paragraph, 1st Sentence and Last Paragraph, Last Word - Change "possible" to "feasible." Possible is generally unconstrained by physical or fiscal limitations, which of course is not practical. Feasible, however, implies both physical and resource constraints.’</p> <p>[Sentences in question: “This master plan supports providing for adequate drainage but recommends that a roadway design without drainage ditches be retained wherever possible.” “Reduced mowing of roadside edges should not result in impaired driver vision around bends or corners; however, existing plant groupings should be retained whenever possible.”]</p>	Staff agrees with MCDOT and will make the requested changes. The word “feasible” more precisely describes what actions are reasonable to consider. This one word is not intended to allow MCDOT to circumvent any requirements of this plan.
	Laura Van Etten (RRAC)	<p>The RRAC does not agree with these changes. Regarding drainage, the RRAC states, “Cost constraints are always considered as part of a project's evaluation but this has no place in a master plan. Allowing such drainage to be adversely affected by minor costs savings instead of providing what the Code requires is not acceptable.” As for the plant groupings sentence, the RRAC states that “it would allow developers, MCDOT, and any other party to clear cut roadside plantings indiscriminately (as has been done in the past) by claiming cost savings.” The RRAC continues, “It is more cost effective to use best practices on these and all roads.”</p>	

Topic	Name(s)	Comments	Response
Introduction – Bridges (p. 18)	Timothy H. Cupples (MCDOT)	<p>RE: "Design exceptions are possible in some cases, but if a design exception is not granted, then 100 percent of costs will come from the county's budget, taking money away from other vital county programs." The way this sentence is phrased makes it sound like the only option is to pay using county funds, but the other option is to use a design that meets federal and state requirements. Master plans should not dictate how projects are paid for. Rephrase: "If a design exception is not granted, the bridge must be designed to meet federal and state standards or 100 percent of costs will come from the county's budget, taking money away from other vital county programs."</p> <p>'4th Paragraph, Last Sentence - Change "possible" to "feasible." Possible is generally unconstrained by physical or fiscal limitations, which of course is not practical. Feasible, however, implies both physical and resource constraints.'</p> <p>[Sentence in question: "This example shows that it is possible to design a bridge that retains a road's character while also providing a safe experience for those using the road."]</p> <p>See also list of bridges as significant features below.</p>	<p>Staff intends to discuss bridges with the Planning Board at a work session, where such text changes will be determined.</p> <p>Staff will review the plan language regarding bridge funding as part of the work session discussion. The 2022 Infrastructure Investment and Jobs Act is a very complex piece of federal legislation that would be difficult to summarize in a local master plan.</p> <p>Staff agrees with MCDOT and will make the requested change regarding the word "possible." The word "feasible" more precisely describes what actions are reasonable to consider. Again, this one word is not intended to allow MCDOT to circumvent any requirements of this plan.</p>
	Laura Van Etten (RRAC)	<p>The RRAC strongly supports the current use of the word "possible" in the 4th paragraph, last sentence, as opposed to MCDOT's recommendation of the word "feasible." They state, "Replacing the word 'possible' with 'feasible' in this context is changing the meaning of the example and we do not support it."</p>	

Topic	Name(s)	Comments	Response
	Laura Van Etten (RRAC)	<p>“MCDOT and SHA must identify and apply federal design exceptions to the rehabilitation or replacement of rustic bridges that will maintain the rustic character of the road, consistent with County Code and Regulations. Historic and environmental impacts are also factors that can support design exception requests.”</p> <p>The RRAC also states that it has only been in recent years that MCDOT has sought federal aid for bridges on rustic roads and that their policy change “has created an inaccurate perception that the County will receive more federal aid if these bridges are brought up to modern standards.” Montgomery County has so many bridge projects that federal funding is exhausted before all necessary projects can be scheduled, so MCDOT should use federal funding for the non-rustic road bridge projects and continue to use county funding for bridges on rustic roads. But there will be some rustic road bridge projects that can use federal aid and still maintain their features and scale.</p> <p>The RRAC also provided background information indicating that “[b]ridge replacement proposals on Glen Road and Montevideo Road were instrumental to the creation of the Rustic Roads Program.”</p>	<p>MCDOT is the agency best positioned to determine the appropriate actions to take and funding to use for bridge projects in the county.</p> <p>Staff will review the language in the plan to determine if changes are appropriate regarding bridge funding. If a bridge has been designated historic, staff agrees that it is important to retain the essential elements of the bridge when maintenance is required. Bridges will be discussed in detail with the Planning Board at a work session.</p>



Topic	Name(s)	Comments	Response
	<p>Sarah L. Rogers (HM)</p> <p>Leslie Saville</p> <p>Caroline Taylor (MCA)</p> <p>Robin Ziek</p>	<p>Plan language should be “greatly strengthened to echo the language in the County Code, that these historic bridges and Significant Features must be preserved.” The bridges are invaluable and irreplaceable elements of these roads that are critical to the stories they tell and are frequently the most memorable aspect of a road. “Reconstruction may be appropriate on non-historic bridges.”</p> <p>Language in the plan about Maryland Department of Transportation interpretations should be updated with language about federal guidance and funding from the 2022 Infrastructure Investment and Jobs Act.</p> <p>“[T]he bridge section of the master plan appears to have been written to assure that historic bridges are all replaced with standard highway bridges! ... Historic bridges can be preserved and rehabilitated (and with the assistance of federal funding). New bridges can be designed to match the scale of the rustic roads.”</p> <p>Ms. Taylor requests that we remove the sentence on page 18 stating, “However, all bridges must eventually be replaced,” noting that cities throughout the world have managed to retain historic bridges for hundreds of years.</p> <p>Ms. Saville states that the bridge section “is in blatant conflict with the County Code and Regulations, with guidance from the State Highway Administration’s document, Management Plan for Historic Highways and Bridges, with Federal Highway Administration policies that support the preservation of historic bridges, and very likely with preservation laws.”</p>	

Topic	Name(s)	Comments	Response
Introduction – Bridges	Timothy H. Cupples (MCDOT)	<p>“Mouth of Monocacy Road Bridge - the new structure built in 2007 is entirely prefab. We should also note that it is completely different from the concrete framed structure that it replaced. This is great example of how a new replacement structure can differ, sometimes significantly, from the one it replaced and still be a significant feature.</p> <p>The fact that everyone agrees that the new bridge is a significant feature point to the fact that replacement bridges need no match the original to contribute to the value of the road. The bridges section should point out that an approach such as this is an acceptable outcome when a bridge must be replaced.</p> <p>The bridges section should also point out that consideration can be given to realigning the road to build a new bridge that complies with current standards adjacent to an existing bridge, and preserving the existing bridge for ped or bike use. Or another option may be to replace the bridge, but documenting the existing/previous bridge to preserve its history.”</p>	This suggestion will be discussed at a work session, but staff agrees with the RRAC that this would not be in keeping with current Executive Regulations.
	Laura Van Etten (RRAC)	The RRAC states that it “would be inconsistent with Regulations to realign the road during the replacement of the bridge.”	
Introduction – Bridges and Roads within Historic Districts	Sarah L. Rogers (HM) Leslie Saville	<p>Ms. Rogers stated, “For both bridges and designated roads such as Martinsburg Road and other roads that fall within designated National or Montgomery County historic districts, it is important to reference the Secretary of the Interior definitions for Preservation, Rehabilitation, Restoration and Reconstruction.”</p> <p>Ms. Saville stated that the Planning Board asked for references to bridge replacements to be removed and use the <a href="#">Secretary of the Interior’s words</a> instead.</p>	<p>Staff does not intend to make recommendations to MCDOT on the best practices for maintaining the county’s bridges.</p> <p>Staff will review the text to see if improvements can be made, but the guidance from the Secretary of the Interior relates to preservation of historic sites and structures, and very few bridges along rustic roads have been designated historic. The Secretary’s usage of the term “reconstruction” is used only in the case where an historic structure no longer remains. Staff uses the word “replacement” to reflect the reality that some bridges must be completely rebuilt.</p>

Topic	Name(s)	Comments	Response
Road Recommendations – Bridges as Significant Features  Road Recommendations – Bridges as Significant Features	Timothy H. Cupples (MCDOT)	<p>“We have attached our assessment of bridges that are unique and significant. Bridges not identified as such tend to be more modern or standard bridges with little structural significance. We suggest that the plan identify what other objectives should be achieved when these less significant bridges are rehabilitated or reconstructed. We agree that bridge replacements should preserve the existing aesthetic to the extent feasible. When modern safety standards preclude maintaining a particular aesthetic, other options must be considered. This could include realigning the road and constructing a new bridge that complies with current standards while preserving the existing bridge in-place for pedestrian and bicycle use. Another option may be to thoroughly document the existing/previous bridge to preserve its history before replacing it.”</p> <p>Bridges that MCDOT describe as “ordinary” and do not rise to the level of “significant feature:”</p> <ul style="list-style-type: none"> <li>• Berryville Road (M-0028, M-0029)</li> <li>• Burnt Hill Road (M-0157)</li> <li>• Edwards Ferry Road (M-0181)</li> <li>• Glen Road (M-0013, M-0014, M-0015)</li> <li>• Gregg Road (M-0119)</li> <li>• Haviland Mill Road (M-0098)</li> <li>• Howard Chapel Road (M-0123)</li> <li>• Martinsburg Road (M-0042)</li> <li>• Mouth of Monocacy Road (M-0043)</li> <li>• Query Mill Road (M-0020, M-0329)</li> <li>• River Road (M-0038, M-0039, M-0040)</li> <li>• Sugarland Road (M-0034, M-0035)</li> <li>• Swains Lock Road (M-0022)</li> <li>• Sycamore Landing Road (M-0031, M-0032)</li> <li>• White Ground Road (M-0048)</li> <li>• Wildcat Road (M-0068)</li> </ul>	<p>MCDOT has a list of bridges that are considered significant features on rustic roads. There are many factors that need to be considered as a bridge is being preserved, rehabilitated, or rebuilt, including federal funding. As the agency that provides maintenance along rustic roads, MCDOT makes the final determination as to the course of action to take when a bridge needs to be preserved, rehabilitated, or rebuilt for safety purposes. It is expected that MCDOT will inform stakeholders of any anticipated road/bridge projects well in advance at the regularly scheduled meetings to solicit input throughout the entire process of any improvements to roads/bridges.</p> <p>The plan already contains a recommendation that “[k]ey plan stakeholders should work together to develop a set of bridge designs to be used for modifications or reconstruction of bridges identified as significant features.”</p> <p>Staff intends to discuss at bridges at a work session. Staff will set up a meeting with appropriate stakeholders if directed by the Planning Board.</p>

Topic	Name(s)	Comments	Response
	Sarah L. Rogers (HM)	“MCDOT’s comments and the Public Hearing Draft Master Plan both contain damaging language and recommendations about the small, historic bridges along these roads. These bridges are arguably the most valuable aspect of the Rustic Roads. They MUST be protected.” Ms. Rogers has offered to host a joint meeting with Planning staff to work through the bridge issues and suggests that members from the following groups be included: RRAC representatives, Historic Preservation staff and representatives, MCDOT, and other stakeholders. “The intended outcome would be a list of bridges that must be preserved, and for those bridges that are not historic, unusual or narrow, a menu of acceptable recommendations.”	
	Laura Van Etten (RRAC)	“Every bridge listed in the MCDOT chart which they view as “Ordinary” should remain as a Significant Feature in the Master Plan as proposed by Staff.”  The RRAC supports preserving narrow and one-lane bridges as significant features. “Wider two-lane bridges also do not slow traffic the way the narrower bridges do, and thus they do not serve the safety and ‘traffic calming’ function that the smaller bridges naturally provide. Roadway realignment, leaving an original bridge as a pedestrian bridge, or destroying it after documenting it are not acceptable alternatives.” “The Committee would like to work with MCDOT to find sets of acceptable designs for these narrow bridges rather than have the Master Plan set such objectives. This should be an Implementation step.”	
Road Recommendations – Rustic Road Criteria	Timothy H. Cupples (MCDOT) Laura Van Etten (RRAC)	‘In the line for #5, change “accidents” to “crashes.”’	Staff will make this change to reflect recent changes to Chapter 49.
Road Recommendations - Summary of Criteria Evaluation (p. 32)	Timothy H. Cupples (MCDOT) Laura Van Etten (RRAC)	‘In the header row, change the word "accident" to "crash.”’	Staff will make the requested change.
Road Profiles – Traveling Experience (p. 75)	Timothy H. Cupples (MCDOT)	‘2nd Sentence, Last Word - Change "possible" to "permitted.”’	Staff will make the requested change.

Topic	Name(s)	Comments	Response
Road Profiles – Map (p. 76)	Timothy H. Cupples (MCDOT)	‘2nd Paragraph, Last Sentence - Change "whenever possible and practical" to "whenever feasible." [Sentence in question: “. The process leading to approval of such construction should include a review directed towards retaining views whenever possible and practical".’]	Staff agrees with MCDOT and will make the requested change. The word “possible” could be interpreted to mean there is no limit. However, this one-word change is not intended to allow MCDOT to ignore recommendations and requirements of this plan.
	Laura Van Etten (RRAC)	RRAC strongly supports the current language in the plan.	
Road Profiles – Road Characteristics Table – Lane Markings	Timothy H. Cupples (MCDOT)	“Profiles should reference the # of lanes, rather than presence or absence of lane markings. The presence or lack of markings is not a significant feature, and markings may change over time for safety reasons.”	The markings have no bearing on the number of lanes. We can briefly bring this question up at a work session and ask the Planning Board whether to keep this characteristic in the plan.
	Leslie Saville Laura Van Etten (RRAC)	The RRAC requests “that the calling out of current lane markings be kept in the Master Plan for each road, as it will serve as a reference point going forward. Committee members should not have to be the source of personal recollection regarding this important information about all the roads. That information was contained in the 1996 plan, and should be contained in this Update.”	
Road Profiles – Road Characteristics Table – Road Widths	Timothy H. Cupples (MCDOT)	“Measurements of existing lane widths should be noted as tentative, as along some roads there may be existing pavement buried beneath foliage or accumulated soil, or the edge may have eroded over time.”	Road widths on rustic roads typically have a range. Staff will review the description of the road characteristics table to see if improvement can be made to clarify that the road width is a range.
	Leslie Saville Laura Van Etten (RRAC)	The RRAC “do[es] not agree that road widths should be referenced as “tentative.” While it may be a snapshot in time, the Committee has worked successfully with MCDOT over the last 3 years to ensure that inadvertent road widening does not occur with patching and paving operations. The references in the Master Plan are very important to the Committee’s work.”	
Road Profiles – Modified Roads	Leslie Saville Caroline Taylor (MCA)	Do not remove modified roads from the program.	If roads or road segments no longer meet the criteria for a rustic road, they should not remain in the program. Moving forward, more frequent and consistent coordination at regularly scheduled meetings needs to occur to avoid situations like this.

Topic	Name(s)	Comments	Response
Road Profiles as Appendix	Sarah L. Rogers (HM) Leslie Saville Caroline Taylor (MCA) Laura Van Etten (RRAC) Robin Ziek	<p>Appendices are not part of an approved and adopted master plan. The Road Profiles should be part of the approved and adopted plan in order to be enforced and implemented.</p> <p>Ms. Ziek suggests moving the Road Recommendations chapter to an appendix and moving the Road Profiles there instead.</p>	<p>If the individual road profiles with all its sections is included in the body of the main Plan, the document will be well over 600 pages in length. This will make the Plan costly, environmentally wasteful, and difficult to distribute.</p> <p>Planning legal counsel confirmed that plan appendices that are approved by the County Council are as much a part of an approved master plan as the main plan document.</p> <p>The Road Recommendations were included in the main body of the plan so that it is clear what changes are included in the master plan.</p> <p>This issue will be discussed at a work session.</p>
Road Profiles – New	LWVMC Laura Van Etten (RRAC)	The RRAC supports the expanded road descriptions, histories, and maps. The new road profiles contain through and specific information.	Acknowledged.
Road Profiles – Significant Features	Laura Van Etten (RRAC)	We request that newly identified significant features, such as bridges, roadside trees, and hedgerows, remain in the plan and that some others be added (see individual roads).	Planning staff has reviewed the additional significant features and will discuss those still in question with the Planning Board at a work session.
Road Profiles – History	Sarah L. Rogers (HM)	The new road histories help bring forward some of the county’s previously under-told stories, such as those of African American communities and women’s history.	Acknowledged.
Road Profiles – Maps	Sarah L. Rogers (HM) Laura Van Etten (RRAC)	The new maps for individual roads are very attractive.	Staff appreciates the comment.
Road Profiles – Photos	Laura Van Etten (RRAC)	Some of the photographs are not very attractive. The RRAC offers to work with staff to identify better photos for the plan.	Staff will accept photos from all stakeholders and will consider adding them to the plan.
	Sarah L. Rogers (HM)	The new photos help readers visualize the roads.	Acknowledged.

Topic	Name(s)	Comments	Response
Road Profiles – Other Images	Laura Van Etten (RRAC)	The RRAC would like to work with staff to identify historic hand-drawn road plats to include in the plan.	Planning staff considered adding other exhibits such as these to the plan. Given the already voluminous amount of information included in the plan, staff will consider additions like these for any future amendments and updates to historical information.
Implementation – Context	Laura Van Etten (RRAC)	Remove text about it being difficult to have a “one size fits all” approach.	Staff will delete the first two sentences of the Context section.
Implementation – Rustic Roads Advisory Committee – Other Duties	Laura Van Etten (RRAC)	Staff language regarding the duties of the Committee says that, “The Committee also reviews applications along and within the rights-of-way of rustic roads.” In fact, under Ch. 50, of County Code, Subdivision of Land, we review applications for possible effects to the roads both within the rights-of-way and for affected features like views, vistas and scenic easements; we then provide you with our advice. This is how we interact with you, the Planning Board, during the Development Review process. We would like a reference to these requirements from Ch. 50 added to the Master Plan.	Staff does not believe additional language is necessary. We currently rely on the Master Plan Conformance finding in Chapter 50 to apply recommendations and requirements from the Rustic Roads Functional Master Plan to regulatory applications. Additionally, we apply the Rustic Roads paragraph in Chapter 50 to road improvements associated with subdivisions. We have all the tools necessary in code and in the Master Plan to review regulatory applications, and to coordinate our review with the RRAC.
Implementation – Rustic Roads Advisory Committee – Equity	Dan Seamans Laura Van Etten (RRAC)	As part of RRAC’s recommendation to add two members to the committee, they “recommend that these members be considered ‘at-large,’ and language regarding the membership qualifications be stated as ‘representing the geographical, social, economic, recreational and cultural concerns of the residents of the County.’” Examples of potential groups from which to draw new members: residents outside areas with rustic roads, members of Black churches on the roads, bicyclists or others who come to the roads for recreation, or someone with expertise in tourism or historic sites.  Mr. Seamans does not agree for reasons given in the General Comments section above.	See discussion regarding the composition of the RRAC under General Comments above. Regardless of expansion, current membership should also be evaluated to form a more diverse RRAC.

Topic	Name(s)	Comments	Response
Implementation – Staff Coordinator to the RRAC	Laura Van Etten (RRAC)	Please clarify the text where the language states that MCDOT provides staff, offices and supplies. The statute actually states that the Chief Administrative Officer will provide those things. So, at the request of our County Executive, we have an MCDOT staffer providing us with what is called “coordination,” meaning that person sets up virtual meetings, serves as a point of contact for the Committee, and often can provide technical information.	Staff is referencing the same language and interpret that to mean that MCDOT has been designated as staff responsible for providing those services for your meetings and duties on behalf of the Chief Administrative Officer.
Implementation – RRAC as Stakeholders	Laura Van Etten (RRAC)	‘We request that the Draft Plan be corrected where it inaccurately lumps us in with other groups who are “Stakeholders.” We are not Stakeholders. We “oversee and promote” the program as mentioned earlier in the Draft.’	Staff recommends the language remain as written. Albeit an important stakeholder, the RRAC meets any standard definition of “stakeholder.” MCDOT per the County Executive and planning staff per the Planning Board oversee the Rustic Roads Program (MCDOT/County Executive for capital improvements and planning staff/Planning Board for regulatory applications). We coordinate with and take into consideration recommendations and advice from the RRAC when making recommendations to the County Executive and Planning Board on respective projects related to rustic roads.
Implementation – Maintenance and Improvements	Laura Van Etten (RRAC)	Strengthen language in this section to more fully describe rustic road maintenance procedures versus the single sentence in the plan now, which is only a small part of the maintenance requirement. We recommend including “A rustic or exceptional rustic road will receive the level of maintenance as necessary to assure its continued viability as a transportation facility and to allow for safe travel by motorized vehicles, and agricultural equipment.” And, “The rustic or exceptional rustic road classification will not exclude roads from regular maintenance.”	Staff will consider ways to clarify the maintenance procedures of rustic roads. We will also add the current Executive Regulations as a plan appendix.
Implementation – Maintenance – Roadside Vegetation	Laura Van Etten (RRAC)	Clarify language in the plan to make it clear that the problems described are common to all roads and not just rustic roads.	Staff will review the language and clarify the text if necessary.



Topic	Name(s)	Comments	Response
Implementation – Maintenance – Roadside Vegetation	Laura Van Etten (RRAC)	Revise suggested clearance height for trimming overhanging vegetation from 17 feet to 18 feet, per current RRAC-MCDOT agreement. “We recommend that the Master Plan refer to the Tree Trimming Guidelines and that those be posted on the Rustic Roads website maintained by the Planning Department.”	Staff will change this to 18 feet and add text to account for the introduction of future agricultural equipment that may require additional clearance. Staff will also update the plan to recommend that the “Tree Trimming Guidelines” be reviewed and added to the maintenance procedures. (Will also need to include as a plan appendix.)
Implementation – Maintenance – Road Widths	Laura Van Etten (RRAC)	‘[W]e support the Draft in recommending “Continue to maintain narrow road widths and narrow bridges that encourage slower speeds and thus increase safety as users travel along rustic roads....”’	Acknowledged.
Implementation – Maintenance – Road Surfaces	Laura Van Etten (RRAC)	“In this section, the Draft language complains about potholes, at least this time acknowledging that it is not a rustic roads problem. However, the odd description of something they call a washboard effect really has no place in a Master Plan. Again, these are operational issues that do not belong in a Master Plan. They should be removed.”	Staff does not recommend this change. Master plans are designed to identify problems and solutions to those problems. If potholes and the washboard effect are problems on rustic roads that road users complain about, it is appropriate to include them in the plan.
Implementation – Maintenance – Road Surfaces	Dolores Milmoe Laura Van Etten (RRAC)	MCDOT staff dealing with Rustic Roads should take the training program from the Penn State Center for Dirt and Gravel Roads Studies as part of best practices. “We ask that the Master Plan specifically call out the Penn State University program for Environmentally Sensitive Roads, which has a highly regarded training process for maintaining gravel roads.”	Staff defers to MCDOT to determine best practices for road maintenance and relevant training. Perhaps a discussion at the regularly scheduled meetings.
Implementation – Maintenance – Bridges (p. 88)	Timothy H. Cupples (MCDOT)	‘Under #12 - Change "possible" to "feasible." [Sentence in question: “Bridges that are rebuilt should be designed to accommodate the appropriate number of vehicle trips and not be overdesigned; to the extent possible, these designs should use materials that enhance the rustic quality of the road.”	Staff agrees with MCDOT and will make the suggested change.
	Laura Van Etten (RRAC)	The RRAC does not agree with this change, stating that it is inconsistent with County Code.	

Topic	Name(s)	Comments	Response
Implementation – Maintenance – Bridges – Terminology	Barbara Hoover Leslie Saville Laura Van Etten (RRAC)	Without consistent protection, many existing scenic bridges will be lost to modern replacements that are lacking in character. In relation to bridges, replace the word “reconstruct” with “preserve and rehabilitate.” Include the Secretary of the Interior definition for the preservation of bridges and other resources on roads.	The Secretary of the Interior’s language also includes reconstruction as an option. Staff will review the guidance and may suggest edits to the text. But some bridges will need to be reconstructed in their entirety. The suggested guidance applies to structures which have been designated historic, and very few of the bridges along rustic roads have been designated historic. Staff will consider revising the language to apply special treatment to bridges designated historic.
Implementation – Maintenance – Bridge List	Laura Van Etten (RRAC)	“To assure the standing of the list and for the reader’s ease of use, we ask that the appendix list of roads with bridges as significant features be moved into the bridge section of the Master Plan.”	Bridges that are significant features are included in the road profiles along with the other significant features of the road. The appendix containing the list of roads with bridges that are significant features is listed in the table of contents and is already easy to access. Other significant features aren’t listed separately within the plan.
Implementation – Maintenance – Bridges – Design Exceptions	Barbara Hoover Leslie Saville Laura Van Etten (RRAC)	Would like MCDOT and SHA to pursue design exceptions for bridges. Design exceptions have not been accepted well by SHA under the current administration. “The State guidance has been based on policy decisions made by the outgoing Governor’s Administration and is subject to change under a new Administration. The reference to guidance should be replaced by a reference to Federal guidance. We understand that funding for historic bridges is included in the recent Federal infrastructure legislation. We request that MCDOT be asked to engage an engineer with historic preservation experience to lead these projects.”	This should be discussed at the recommended stakeholder meetings, but it is beyond the scope of the master plan based on ever-changing county, state, and federal administrations.
Implementation – Maintenance – Drainage	Laura Van Etten (RRAC)	‘In the section called Drainage, we support the language but ask that it be improved from the current sentence, “The way drainage is handled on these roads is one of their most distinguishing features....” To state that this is the “single, most distinctive feature of the character” of the roads, which is the language from the 1996 Master Plan.’	Staff does not recommend this change. Each rustic road is unique, with many different features combining to convey the rustic character of the road. Drainage is very important, but it is not necessarily the “most distinctive feature of the character” of every rustic road.

Topic	Name(s)	Comments	Response
Implementation – Traffic Calming	Laura Van Etten (RRAC)	“The first paragraph in this section seems to be an indictment of the Rustic Roads Program. In fact, speeding is a County-wide problem, as we all know from Vision Zero efforts. We request that this section be rewritten to reflect that this is a County-wide problem.”	Staff is not opposed to a broader discussion of vehicular speed on roads and our Vision Zero efforts. This section describes issues that occur along rustic roads and provides the context behind the recommendations that follow.
Implementation – Traffic Calming	Laura Van Etten (RRAC)	“Our Committee recently proposed a change to Code setting the maximum target speed for rustic and exceptional rustic roads at 30 miles per hour. We were successful and Council adopted that change on Nov. 7. We would like the Master Plan to mention this accomplishment. Similarly, the Committee was successful in getting a change to Code to allow the use of speed humps where appropriate on rustic roads. Up until our intervention, speed humps were only allowed on roads designated residential. We would like the Master Plan to mention this accomplishment.”	Staff recommends we echo language related to slow speeds and Vision Zero. Staff will reference the target speed and speed controls as approved/amended during review of the Complete Streets Design Guide.
Implementation Chapter – Historic Preservation	Sarah L. Rogers (HM) Robin Ziek	Support for the recommendations under the Historic Preservation heading. These recommendations should be moved to the top of the plan to reflect their importance.	Staff does not recommend this change. The Implementation Chapter of the plan is organized to provide overarching policy recommendations first to emphasize the procedures that will provide for a smoother operation of the program in the future. The Historic Preservation Section of the Implementation Chapter provides next steps on how to continue to refine existing road profiles as more information is learned about individual roads and to promote the historical nature of the program itself.
Implementation – Recommendation to Partner with Heritage Montgomery	Laura Van Etten (RRAC)	We support the recommendation to continue partnering with Heritage Montgomery as they update their interpretive plan to highlight rustic roads.	Acknowledged.

Topic	Name(s)	Comments	Response
Implementation – Recommendation to Identify Historic African American Settlements	Eileen McGuckian (MPI) Laura Van Etten (RRAC)	“We especially support the Plan’s recommendation to reevaluate the county’s historically Black rural communities to identify rustic roads with historic and cultural significance tied to African American settlements.”	Staff agrees. Staff envisions the Rustic Roads Functional Master Plan, in the future, being a living document that will need minor updates on a more consistent basis rather than every 25 years. A critical part of any minor update is to update the histories of road profiles as more information about the roads is discovered. This includes histories regarding underrepresented groups and communities.
Implementation – Quarterly or Biannual Meetings with MCDOT and Office of Ag	Laura Van Etten (RRAC)	RRAC Meetings are subject to the Open Meetings Act. We ask that MCDOT and the Montgomery County Office of Agriculture come to our meetings and be placed on the agenda to discuss any issues rather than setting up another set of meetings that may not be subject to the Open Meetings Act.	Staff is recommending that recurring coordination meetings with stakeholders occur at selected, regularly scheduled RRAC meetings. We will revise the language to clarify that ideally these stakeholder meetings would be integrated into the regularly scheduled RRAC meetings.
Implementation – Awareness Promotion	Robert K. Sutton (HPC)	“In addition to the tools for awareness promotion and heritage tourism already identified in Recommendation #25, the HPC supports the production of an audio-tour version of the road descriptions which would be more accessible than the plan document for anyone driving.”	Staff supports this comment. However, this is not part of this plan update or a future planning work program. Perhaps an audio tour may be established by Heritage Montgomery or another entity through a state or federal grant.
Implementation - Historic Resource Recognition	Robert K. Sutton (HPC)	“[W]e are concerned for the many historic bridges found along the rustic roads. These bridges contribute significantly to the historic character of these roadways and should be protected wherever safety and agricultural needs allow. We support the plan’s call for bridges with identified historic value to be formally documented in the Maryland Inventory of Historic Properties and to be considered for potential designation in the Master Plan for Historic Preservation or nomination to the National Register of Historic Places (Recommendation #27).”	Acknowledged.
Implementation - Inclusive and Equitable Access	Robert K. Sutton (HPC)	“[T]he HPC encourages the Planning Board to strengthen the plan’s call for inclusive and equitable access to these resources for those without personal vehicles (Recommendation #29). Local historical societies would be valuable partners for planning inclusive programming and coordinating bus tours.”	Planners envision that this issue will be addressed in a future plan amendment along with the other historic preservation recommendations.

Topic	Name(s)	Comments	Response
Plan Appendixes – Environment – Special Protection Areas	Timothy H. Cupples (MCDOT)	‘3rd Sentence, Last Word - Change “possible” to “feasible.”’ [Sentence in question: “In SPAs, land-use controls and management techniques help ensure that impacts from development activities are mitigated as much as possible.”]	Staff will review the language and make appropriate changes if necessary. Perhaps something like: “In SPAs, land-use controls such as limiting imperviousness, planting forest buffers, and requiring enhanced erosion control help mitigate the impacts of development activities.”
	Laura Van Etten (RRAC)	The RRAC does not agree with this change, and state, “The use of the word ‘feasible’ would allow MCDOT to use improper maintenance procedures at their own discretion. ‘Feasible’ is an inappropriate change in this context for SPAs.”	
Plan Appendixes – Rustic Roads with County-Maintained Bridges as Significant Features	Timothy H. Cupples (MCDOT)	‘Modify this list accordingly if changes are made to which bridges are retained as significant features. See discussion on bridges above.’	Acknowledged.
Traffic and Crash Analysis – Report	Timothy H. Cupples (MCDOT)	<p>p. 3: ‘Typo in the parenthetical sentence: “from the intersections use in this analysis” should be “from the intersections used in this analysis.”’</p> <p>p. 16: ‘Consider rephrasing “ ... pedestrians dare only use the least traveled of the roads” with something like: “ ... due to either the distance from destinations or caution about safety: pedestrian volumes tend to be low along rustic roads.” This softens the language slightly but also opens up another likely reason why pedestrian volumes are low. This also gets away from saying that pedestrians only use the least traveled roads, as I’m not sure we have good ped volume data to support that claim (but if we do, feel free to keep your language I).’</p> <p>p. 18: ‘The asterisk footnote for Table 15 should use the word “Exceptional” instead of “Exceptionally.”’</p>	Staff will make the suggested changes.

## Comments on Groups of Roads

Topic	Name(s)	Comments	Response
Bicycling Roads	Susan Golonka (WWO) Carol Linden	A list of roads bicyclists ride regularly: Big Woods Road, Cattail Road, Club Hollow Road, Comus Road, Edwards Ferry Road, Elmer School Road, Hughes Road, Jerusalem Road, Martinsburg Road, Mount Ephraim Road, Mount Nebo Road, Old Bucklodge Lane, Peach Tree Road, Schaeffer Road, Sugarland Road, Wasche Road, West Willard Road, Westerly Road, White Ground Road, Whites Store Road	Acknowledged.
Dedicated But Unmaintained (DBU) Roads	Timothy H. Cupples (MCDOT)	See comment on MCDOT's DBU policy above. Includes parts or all of: Aitcheson Lane, Belle Cote Drive, Bentley Road, Old Orchard Road, and Poplar Hill Road. DBU Website: <a href="https://www.montgomerycountymd.gov/dot-dte/projects/dedicated/index.html">https://www.montgomerycountymd.gov/dot-dte/projects/dedicated/index.html</a> Direct Link to DBU List: <a href="https://www.montgomerycountymd.gov/dot-dte/Resources/Files/DBU/120121%20DBU_List.pdf">https://www.montgomerycountymd.gov/dot-dte/Resources/Files/DBU/120121%20DBU_List.pdf</a>	See discussion of DBU roads in the General Comments section above.
	Laura Van Etten (RRAC)	See RRAC's comments on DBUs above.	
"Glen" Roads	Ginny Barnes (WMCCA)	Support the exceptional rustic designation of the three roads in the Glen: Glen Road, Glen Mill Road, and South Glen Road. These roads help limit stormwater run-off and enhance the adjacent forest canopy. The two bridges in the Glen and the history along these roads is also important.	Acknowledged.
Lock Roads	Tina Cappetta (NPS)	Support designation of multiple rustic and exceptional rustic roads that lead to or through the C&O National Historical Park. They protect cultural landscapes and viewsheds and support NPS's work in interpreting the C&O Canal.	Acknowledged.
M-NCPPC Park Roads	Timothy H. Cupples (MCDOT)	"There may be some roads that may arguably not really function as roads. Two examples appear to include Hoyles Mill Road and Hyattstown Mill Road/ Prescott Road, which are mostly closed within gates and may be more akin to park trails."	Montgomery Parks strongly supports the exceptional rustic road designation for these roads. The designation helps "ensure their bucolic and park-like nature and historicity" and "speaks to the cultural and historic significance of these roads."
	Laura Van Etten (RRAC)	"All of these roads are clearly qualified to be included in the Rustic Roads Program."	

Topic	Name(s)	Comments	Response
State Roads	Timothy H. Cupples (MCDOT)	“Several State roads are included in the program, including MD 109 (Beallsville Road and Old Hundred Road), MD 117 (Bucklodge Road), and MD 355 (Frederick Road). We note that State roads are inherently regional in nature, and the State is not subject to County laws, potentially limiting the effectiveness of the Rustic designations.”	<p>SHA and Montgomery Parks supported the inclusion of their roads in the program. While there isn’t a large effect from naming a state or Parks road rustic because they are not maintained by MCDOT, if a road meets the criteria, it should be named rustic.</p> <p>Sec. 49-79. Maintenance and improvements. (b) of County Code states: “State and park roads. The Executive must encourage the State Highway Administration and the County Parks Department to maintain and improve rustic roads owned by the State or Park Commission in a manner consistent with this Article.”</p> <p>Staff intends to include this as a discussion item at a work session.</p>
	Laura Van Etten (RRAC)	“Parts of all of these roads are Maryland Scenic Byways, and clearly meet the criteria to be included in the Rustic Roads Program. These programs complement one another, bringing heritage tourism to the roads for multiple purposes. See their maintenance guidelines <a href="https://www.roads.maryland.gov/OED/CSS-3.pdf">https://www.roads.maryland.gov/OED/CSS-3.pdf</a> . There is no reason to remove these historic roads from the Program.”	

## Comments on Individual Roads

Road Name	Name(s)	Comments	Response
General comment on some “before” and “after” photos shown at the Public Hearing.	Laura Van Etten (RRAC)	“Testimony presented about road maintenance issues showed “Before” pictures of issues already being addressed. The Rustic Roads Advisory Committee has actively worked to ensure that they were addressed.”	Acknowledged.
Aitcheson Lane	Timothy H. Cupples (MCDOT)	Part of Aitcheson Lane is on the DBU list. MCDOT does not believe roads on the DBU list should be rustic roads.	The nominated section of Aitcheson Lane does not include the segment on the DBU list.
Avoca Lane	Quentin Remein (CCA)	The CCA supports changing the entire length to exceptional rustic.	Acknowledged.
Awkard Lane	Ellen and Endel Mann Judy Mauldin (HGHPA) Jean Thomas Moore (HGHPA) Quentin Remein (CCA) Patricia Thomas (HGHPA)	Designate Awkard Lane a rustic road. Awkard Lane is part of the community of Holly Grove, a significant historic community established c. 1880 after Quakers sold land to formerly enslaved individuals. Several descendants of the original inhabitants still live on Holly Grove Road and Awkard Lane.	While Awkard Lane meets most of the criteria to be designated rustic, it does not retain the visual character that distinguishes these roads.

Road Name	Name(s)	Comments	Response
Barnesville Road	Timothy H. Cupples (MCDOT)	“There is no feasible way to rehab or preserve the railings of the bridge over Little Monocacy River. They do not meet current standards for crashworthiness. Given the ADT and speed limit, the only feasible approach if/when this bridge needs to be replaced will be to realign the road if it is desired to keep the existing bridge, or document it and replace it in compliance with current standards. Should verify that this road meets the local traffic criteria. The segment east of MD-109 may not carry predominantly local traffic.”	Plan stakeholders should work together to come up with an appropriate design for the bridge that maintains the road’s current alignment.
	Laura Van Etten (RRAC)	“We support MCDOT being required to contract with an historic bridge expert to lead any project regarding the bridge on this rustic road. We would look to that expert to advise about retention of existing railings for this bridge. The MDOT Management Plan for Historic Highway Bridges provides guidance for Appropriate Railing Treatments. We recommend that this resource be used. Realigning the road is inconsistent with the Regulations.”	
Batchellors Forest Road	Laura Van Etten (RRAC)	<p>The RRAC recommends replacing the last paragraph of the Traveling Experience which reads as following:</p> <p>“The Bicycle Master Plan recommends a sidepath along Batchellors Forest Road from an existing off-street trail just south of Batchellors Run to Farquhar Middle School.”</p> <p>With the following text:</p> <p>“A natural surface trail extends north from Farquhar Middle School to connect the residential area to the school. Extending the trail across the school frontage to the entry sidewalk would allow students living to the north to walk to school. The Bicycle Master Plan recommends a sidepath along Batchellors Forest Road from an existing off-street trail just south of Batchellors Run stream crossing to Farquhar Middle School. Due to mature trees and forest beside the roadway, conservation easements, steep grades and limited right-of-way, a continuation of this natural surface trail has been recommended.”</p>	<p>The natural surface trail that extends north from the school is non-existent. It appears that it was a grassy stretch that someone kept mowed for a brief period and then stopped, and there doesn’t appear to be any effort to continue providing a path in that location.</p> <p>Regardless, a grassy path is not sufficient for providing a safe route for children to get to school on all but the sunniest days and would be difficult to navigate on a bicycle or other wheeled transportation options. It is important that a well-built, safe path be provided to help students in the area reach the school and also provide a recreational amenity for residents of the road. The short stretch of the former Trotter’s Glen Golf Course golfcart path that parallels the road does not detract from the character of the road and serves as a good example of what a sidepath could look like.</p>



Road Name	Name(s)	Comments	Response
	Timothy H. Cupples (MCDOT)	<p>“We have substantial safety concerns with increasing development and traffic along this street, noting that the street has been substantively redeveloped with suburban-type development patterns and includes multiple civic destinations: a high school, a middle school, an Academy, a park at the southern end, and a major theatre center at the northern end.”</p> <p>“Batchellors Forest Road has experienced significant suburban growth, serves as a regional connector, and provides access to numerous schools and cultural and recreational destinations. Portions of this roadway do not appear to meet the Local Use and Traffic Volumes parameters of a Rustic Road. We recommend that the Planning Department reconsider the physical extents of the Rustic designation for this road.”</p> <p>p. 42: ‘1st Paragraph, Last Word - Change “possible” to “feasible.”’</p>	<p>MCDOT presents a very good case. Planning staff will discuss this issue at a work session with the Planning Board.</p> <p>Staff agrees with MCDOT regarding changing the text from “possible” to “feasible” even though the project has been completed. Staff notes that the criteria for low traffic volumes and for predominantly local use must be considered separately.</p>
	Laura Van Etten (RRAC)	<p>“This road was evaluated based upon current information regarding crashes and traffic volumes and was well within the criteria for rustic designation. There are restrictions in place for travel by Good Counsel school students which is strictly enforced by the school. Farquhar Middle school busses should be exclusively using Old Vic Blvd. access unless students live on Batchellors Forest Road. Through traffic is limited at the south end at Georgia Avenue which only allows right hand turns traveling northward. According to MCDOT traffic counts, there are 1,000 – 1,500 trips per day on this road, which is well within appropriate levels for a rustic road. Little future development is expected on the road. The Committee has noted that in front of Farquhar Middle School, excess pavement between utility poles may be contributing to automobile crashes into those poles. We recommend removal of the excess pavement.”</p> <p>The RRAC does not support changing “possible” to “feasible” because the referenced entry drive has already been built.</p>	

Road Name	Name(s)	Comments	Response
Batson Road	Quentin Remein (CCA)	The CCA supports the rustic designation of Batson Road.	Acknowledged.
Beallsville Road (MD 109)	Timothy H. Cupples (MCDOT)	MCDOT does not believe that state roads should be rustic roads.	See discussion under State Roads above.
Belle Cote Drive	Timothy H. Cupples (MCDOT)	All of Belle Cote Drive is on the DBU list. MCDOT does not believe roads on the DBU list should be rustic roads.	The road was added to the program before the DBU policy was created. Planning staff suggest the policy be updated to clarify how the road can be improved to be accepted for maintenance.
Bentley Road	Timothy H. Cupples (MCDOT)	<p>“Meeting House Road and Bentley Road, both in the Sandy Spring area, partially run alongside CRN zoning. Bentley Road also provides access to the Sandy Spring Museum, and Meeting House Road has a large, proposed age-restricted, multi-family development. Reiterating comments made during the 2015 Sandy Spring Rural Village Plan: we note that the first 500 feet from MD 108 (Olney Sandy Spring Road) along each road does not appear to meet the criteria for inclusion as Rustic Roads and these segments should be reconsidered.”</p> <p>The end of Bentley Road is on the DBU list. MCDOT does not believe roads on the DBU list should be rustic roads.</p>	<p>Planning staff agrees that the extent of the rustic designation of Bentley Road should not be changed. Bentley Road is a short, dead-end road with a low traffic volume. The appearance of the adjacent Sandy Spring Museum is enhanced by the rustic nature of the road. This recommendation will be discussed at a work session.</p> <p>The segment of Bentley Road on the DBU list was already on the list when the road was designated rustic by the County Council in 2015. Planning staff suggest the policy be updated to clarify how the road can be improved to be accepted for maintenance.</p>
	Sarah L. Rogers (HM) Robin Ziek	<p>Responding to recommendation from MCDOT to reduce extent of Bentley and Meeting House roads, Ms. Rogers states, “These roads are included in the Heritage Montgomery African American History Driving Tours and other tour site descriptions. These highly historic and outstanding roads should remain in the program for their entire lengths and continue to be fully protected by it.”</p> <p>“This will further degrade the historic character of both Bentley and Meeting House Roads.”</p>	

Road Name	Name(s)	Comments	Response
	Laura Van Etten (RRAC)	“The CRN zoning covers a commercial operation that was in place at the time of designation and is anticipated to continue. The zoning is not expected to have any additional impact on the road. The driveway access for the Sandy Spring Museum is on Bentley Road. At the time of designation, the Museum wrote in favor of the designation. Pedestrian and bicycle access comes from the shared use path along Olney Sandy Spring Road (MD-108) and connects to the Museum’s front door, which provides ADA access.”	
Berryville Road	Francoise "Frankie" Andre and Apostol Vassilev	Stated that Berryville Road is a beautiful Road that crossing through Seneca Creek State Park. Described the features along the road, and also showed photos of the road.	Acknowledged.
	Barbara Hoover	[Provided aerial photo of the road and Seneca Creek.]	
	Ellen Jimerson	Provided testimony on her experiences along the road as a resident in support of the program.	
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0028 and M-0029 should be significant features.	The bridges make a significant contribution to the character of the road.
Big Woods Road	Bev Thoms	Rustic designation keeps road beautiful and speeds down.	Acknowledged.
Black Rock Road	Miriam Schoenbaum (BHS)	[Provided photo.]	Acknowledged.
Brookeville Road	Barbara Hoover	In her Planning Board testimony, Ms. Hoover provided a brief history of the road and included photos. [Provided description and photo of Oakley Cabin as example of historic African American community.]	Acknowledged.
	Leslie Saville Caroline Taylor (MCA)	<p>Ms. Taylor requests that we not remove the recommended section of Brookeville Road from the program. It is a very early road and should remain. The changes being made by MCDOT and SHA as part of the Brookeville Bypass project “do[] not constitute a reason to remove it from the program.” “These changes, it should be noted, were taken in defiance of staff recommendations and the rustic roads program's clear requirements.”</p> <p>Ms. Saville states that MCDOT approved changes to the road without consulting with RRAC and in opposition to direction from Planning staff. She states that the road still meets the criteria of a rustic road, despite the “slightly revised alignment” referred to in the plan.</p>	The section being removed from the program is being partially realigned and entirely rebuilt as part of the project. It will essentially be a new road built to modern standards, including a very modern looking roundabout. This segment of the road should not remain in the program, despite the deep history of the area.

Road Name	Name(s)	Comments	Response
Bryants Nursery Road	Quentin Remein (CCA)	The CCA supports the rustic designation of Bryants Nursery Road.	Acknowledged.
Bucklodge Road	Lori Larson	Bucklodge Road is a snow emergency route between two major roads and serves as a connector road. Is it appropriate to be included in the program?	The status of a road as a snow emergency route has no bearing on how the road is maintained.
	Miriam Schoenbaum (BHS) Anne Hyman (PPTC)	Designate Bucklodge Road (MD 117) rustic. [Provided photos.]	Acknowledged.
Burnt Hill Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0157 should be a significant feature.	The bridge makes a significant contribution to the character of the road.
Clopper Road	Miriam Schoenbaum (BHS)	[Provided photo.]	Acknowledged.
Comus Road	Ellen Gordon	Uses Comus Road for her horse trailer, hay deliver, feed pick-up. Sees large farm tractors and grain trailers successfully navigate the road.	Acknowledged.
	Steven Findlay (SCA)	We urge you to pay especially close attention to the preservation of this road, which is one of the “key bucolic pathways in the Ag Reserve.”	
Davis Mill Road	Robert Goldberg	Support retaining classification as a rustic and exceptional rustic road. [Provided photos taken along Davis Mill Road.]	Acknowledged.
Elton Farm Road	Barbara Hoover	In her Planning Board testimony, Ms. Hoover provided a brief history of the road and included photos. [Provided description of important historic features accessed from road. Included photo.]	Acknowledged.
Edwards Ferry Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0181 should be a significant feature.	The bridge makes a significant contribution to the character of the road.
Frederick Road (MD 355)	Timothy H. Cupples (MCDOT)	<p>“Frederick Road (MD 355), a State road providing regional connectivity, has the highest traffic volume in the program and a substantive history of crashes. It does not appear to meet the criteria of a Rustic Road and risks diluting the program’s integrity. Furthermore, the road’s significant features are buildings and views, which are better protected by the existing Hyattstown Historic District.”</p> <p>MCDOT does not believe state roads should be rustic roads.</p>	The 1994 Clarksburg Master Plan and Hyattstown Special Study Area included several reasons for designating this segment of MD 355 rustic. The plan suggested several changes to the road network in support of this recommendation, which was intended to preserve the road in its current state through this historic district. To be discussed at a work session.

Road Name	Name(s)	Comments	Response
	Laura Van Etten (RRAC)	The RRAC supports retaining the rustic designation. It is in a historic district, the County Council has approved a future bypass, and the interchange at I-270 is approved for eventual closure to remove cut-through traffic from the historic district. The RRAC does not feel that it is appropriate for MCDOT to express an opinion since this is a state road. The RRAC also states that MCDOT misunderstands that the program does not protect buildings, but instead calls out alignments and features that make the road unique.	See discussion under State Roads above.
	Leslie Saville Laura Van Etten (RRAC)	Consider adding the segment of Frederick Road from Old Hundred Road to Hyattstown Mill Road to the Program. It is within the Hyattstown Historic District just like the existing rustic segment of the road.	The section of Frederick Road that the RRAC is proposing to add to the program has large section of front in parking and multiple curb cuts. This part of Frederick Road is south of the recommended bypass and will therefore continue to carry too much traffic even when the bypass has been completed.
Game Preserve Road	Timothy H. Cupples (MCDOT)	“Game Preserve Road, a well-traveled cut-through, has a substantive history of crashes. This road is seeing new development, particularly along the more suburban area at its western end, including a proposed assisted living facility. We recommend that staff review development patterns and collision history in the context of the Rustic Road criteria and consider refining the length of the Rustic Road designation.”	This road will be discussed at a work session.
	Laura Van Etten (RRAC)	The RRAC states that the road meets the criteria for a rustic road. According to the RRAC, “[t]raffic volumes and crashes dropped precipitously with the opening of Watkins Mill Road.” It is unclear if the proposed assisted living facility will proceed, and even if so, a single such facility will not “impair the rustic nature and qualifications of this road.”	
Glen Mill Road (Rustic)	Laura Van Etten (RRAC)	In the rustic section of the road, please add the hedgerows mentioned in the Environment section as a significant feature and also show them on the accompanying profile map.	Planning staff does not agree that the vegetation rises to the level of significant.
Glen Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0013, M-0014, and M-0015 should be significant features.	The bridges make significant contributions to the character of the road.

Road Name	Name(s)	Comments	Response
Gregg Road	Peter Ciferri (Alder Energy) Dan Seamans (RRAC)	Designate Gregg Road rustic between Zion Road and Riggs Road. The rest of Gregg Road is already rustic (and recommended as exceptional rustic), and the undesignated section is surrounded by other rustic roads (Zion, Riggs, Gregg).	Staff supports this recommendation, as does the RRAC. The current non-rustic portion of Gregg Road has similar characteristics exceptional rustic portion of the road. Additionally, the two ends of the non-rustic portion of Gregg Road are intersected by Zion Road (rustic road) and Riggs Road (exceptional rustic road).
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0119 should be a significant features.	The bridge makes a significant contribution to the character of the road.
Haviland Mill Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0098 should be a significant features.	The bridge makes a significant contribution to the character of the road.
Holly Grove Road	Ellen and Endel Mann Judy Mauldin (HGHPA) Jean Thomas Moore (HGHPA) Quentin Remein (CCA) Patricia Thomas (HGHPA)	Designate Holly Grove Road south of Norwood Road a rustic road. Holly Grove is a significant historic community established c. 1880 after Quakers sold land to formerly enslaved individuals. Several descendants of the original inhabitants still live on Holly Grove Road and Awkard Lane. HGHPA requests to correct a misstatement in the 1997 Cloverly Master Plan that states the road has no historical significance or rural characteristics. HGHPA also notes the undisturbed streams along Holly Grove and Awkard that eventually feed into the Northwest Branch and provide habitat for fish. HGHPA provided details of the early inhabitants of the Holly Grove community.	Staff agrees and the current plan draft includes this recommendation.
Holsey Road	Warren Fleming (DCC) Rev. Gloria Lyles Rose Ziegler	Oppose designating Holsey Road as a rustic road because it will limit the necessary upgrades to the road (drainage features, lights, widening, etc.) with the development to properties nearby. The main concern is inadequate fire truck access because of the narrow road. There are also safety concerns because of the blind curves.	Holsey Road is surrounded by the 5-acre RC zone and, at the end, the 25-acre Ag Reserve zone. Furthermore, the properties along this road are in sewer category S-6 due to the distance from existing sewer infrastructure and the environmental sensitivity of being in the Patuxent PMA. Substantial development is not possible along this road. The concerns laid out are common to all rustic roads and have not presented obstacles to additional houses being built or prevented first responders from reaching houses along the road.
	Laura Van Etten (RRAC)	The RRAC respects the position of the former residents of Holsey Road and is disappointed that the community does not support the designation.	

Road Name	Name(s)	Comments	Response
Howard Chapel Road	Robert Butts (Waradaca)	The road has become a busy commuter route, with morning backups common. It is also a popular bike route and safety is a concern, with the road's blind corners, lack of shoulders, and standing water on the south end with any heavy rain.	See discussion of maintenance issues discussed above.
	Jim Quinn	Howard Chapel Road needs better maintenance.	See discussion of maintenance issues discussed above.
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0123 should be a significant feature.	The bridge makes a significant contribution to the character of the road.
Hoyles Mill Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe that park roads should be rustic roads because they are closed to traffic and function more as park trails.	See discussion under M-NCPPC Park Roads above.
Hughes Road	Barbara Hoover	[Provided photo of road with fall colors after a rainfall.]	Acknowledged.
Hyattstown Mill Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe that park roads should be rustic roads because they are closed to traffic and function more as park trails.	See discussion under M-NCPPC Park Roads above.
Johnson Road	Quentin Remein (CCA)	The CCA supports the rustic designation of Johnson Road.	Acknowledged.
Kings Valley Road	Laura Van Etten (RRAC)	Please add "historic alignment including a jog in the road at Kingstead Road" to the significant features.	Planning staff will review the plan's language and make revisions if necessary, but the jog is part of the historic alignment and the plan also contains a recommendation to not realign the road at the jog.
Lewisdale Road	Laura Van Etten (RRAC)	Please add hedgerows to significant features as mentioned in traveling experience and as located on map.	The hedgerows in question appear to be a disorganized growth of trees and shrubs along the road and not worthy of preservation as significant features.
Link Road	Timothy H. Cupples (MCDOT)	<p>"Link Road is proposed to be removed from the program. As the recent update to Chapter 49 does not provide a new default classification for Rustic Roads, I suggest including a new classification here. The choice would be between either Country Road or Neighborhood Street. Country Road fits the context of the general area, but Neighborhood Street fits the immediate land uses. I have no strong opinion as to which should be applied." (Applies to text on page 31.)</p> <p>p. 58: '1st Paragraph, Last Sentence - Change "accident" to "crash."'</p>	<p>Staff will review and propose a classification. Staff has followed proper noticing procedures for the functional master plan, which does not include notifying individual residents of changes along the roads that they live on.</p> <p>Staff will change the word "accident" to "crash" to align with recent changes to County Code.</p>

Road Name	Name(s)	Comments	Response
	Laura Van Etten (RRAC)	The RRAC asks whether the residents of Link Road have been informed of our recommendation to remove it from the program.  They support changing “accident” to “crash.”	
	Quentin Remein (CCA)	The Cloverly Civic Association does not object to Link Road being removed from the program.	
Martinsburg Road	Anne Sturm	As you drive along the road, you can see numerous birds from the comfort of your car, which is great for an eighty-year-old birder.	Acknowledged.
	Barbara Hoover	In her Planning Board testimony, Ms. Hoover provided a brief history of the road and included photos. [Provided as example of road designated in the Master Plan for Historic Preservation. Included photo.]	
	Steven Findlay (SCA)	Historic Linden Farm is on Martinsburg Road and people truly appreciate the location on this historic road. The road is also frequently used by bicyclists and local farmers.	
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0042 should be a significant feature.	The bridge makes a significant contribution to the character of the road.
Meeting House Road	Timothy H. Cupples (MCDOT)	“Meeting House Road and Bentley Road, both in the Sandy Spring area, partially run alongside CRN zoning. Bentley Road also provides access to the Sandy Spring Museum, and Meeting House Road has a large, proposed age-restricted, multi-family development. Reiterating comments made during the 2015 Sandy Spring Rural Village Plan: we note that the first 500 feet from MD 108 (Olney Sandy Spring Road) along each road does not appear to meet the criteria for inclusion as Rustic Roads and these segments should be reconsidered.”	Meeting House Road is a short, dead-end, low-volume road within a Master Plan Historic District. Staff supports maintaining the current extent of the road. This recommendation will be discussed at a work session.
	Sarah L. Rogers (HM) Robin Ziek	Responding to recommendation from MCDOT to reduce extent of Bentley and Meeting House roads, Ms. Rogers states, “These roads are included in the Heritage Montgomery African American History Driving Tours and other tour site descriptions. These highly historic and outstanding roads should remain in the program for their entire lengths and continue to be fully protected by it.”  “This will further degrade the historic character of both Bentley and Meeting House Roads.”	



Road Name	Name(s)	Comments	Response
	Laura Van Etten (RRAC)	The combination of being within an historic district and an overlay zone “assures comprehensive reviews of all changes and compatibility with the exceptional rustic road designation.” Ms. Van Etten provided numerous reasons why this road should remain rustic.	
Montevideo Road	Christopher Marston Eileen McGuckian (MPI)	The c. 1910 truss bridge on Montevideo Road is a great example of preserving an historic bridge rather than replacing it with a modern structure. The recent Michael Dwyer Award for Rehabilitation from Montgomery Preservation is a great example of the partnership between the RRAC and MCDOT.	Acknowledged.
Moore Road	Lori Larson	[Provided photos showing water running into and across Moore Road after a rainstorm.]	Acknowledged. Roads in the Rustic Roads Program need to be maintained so that they are safe in all types of weather events.
Mount Carmel Cemetery Road	Kevin Foster	In support of the staff designation of the entire length of Mount Carmel Cemetery Road as a rustic road.	Acknowledged.
	Laura Van Etten (RRAC)	Please add the mature trees along the south side of Mount Carmel Cemetery Road as a significant feature.	While staff appreciates trees along roads, staff does not believe they rise to the level of significance.
Mount Ephraim Road	Michael Jamison	[Provided photo showing vegetation encroaching into the roadway.]	Acknowledged.
	Steven Findlay (SCA)	We urge you to pay especially close attention to the preservation of this road, which is one of the “key bucolic pathways in the Ag Reserve.”	
Mount Nebo Road	Michael Jamison	[Provided photos showing the difficulties of moving large equipment due to the road’s narrowness and overhanging trees.]	Acknowledged.
	Laura Van Etten (RRAC)	Please include two one-lane culverts as significant features that are not listed in the bridge book.	Staff does not agree that culverts are significant features.
Mouth of Monocacy Road	Robert Baker	“Mouth of Monocacy road provides a scenic perimeter to the boundary of our farm.” (Adopt-A-Rustic-Road participant.)	Acknowledged.
	Laura Van Etten (RRAC)	The RRAC recommends including the B&O Railroad Viaduct as a significant feature.	Significant features are those “that must be preserved when the road is maintained or improved.” The B&O viaduct is not an element of the road that MCDOT would be able to preserve or not preserve to maintain the road.
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0043 should be a significant feature.	The bridge makes a significant contribution to the character of the road. Staff recommends this designation remain.

Road Name	Name(s)	Comments	Response
Oak Hill Road	Laura Van Etten (RRAC)	Please add mature trees to the map northwest of the power lines.	2019 aerial photographs were used to create the forested layer on the profile maps. The forested areas of the Oak Hill Road map align with the latest aerial photography.
	Quentin Remein (CCA)	The CCA supports the rustic designation of Johnson Road.	Acknowledged.
Old Bucklodge Lane	Miriam Schoenbaum (BHS)	Supports reclassifying Old Bucklodge Lane exceptional rustic. [Provided photos.]	Acknowledged.
	Barbara Hoover	[Provided photo of hunting dogs and equestrians on road.]	
Old Hundred Road (MD 109)	Leslie Saville Caroline Taylor (MCA)	Ms. Taylor requests that we not remove the recommended section of Old Hundred Road from the program. The crashes on this road are in the vicinity of the I-270 interchange, which the Clarksburg master plan recommends closing. Instead, “[a]dd language indicating support for changes to the interchange area to improve safety and reduce crashes.”  Ms. Saville suggests that the road remain rustic unless the master plan specifically changes the recommendations from the 1994 Clarksburg plan regarding closing the interchange. As an interim measure, she suggests that we “add language to the plan supporting safety improvements in the vicinity of the interchange.”	Planning staff will raise these concerns at a work session.
	Laura Van Etten (RRAC)	RRAC does not agree this segment should be removed from the program because of the intersections with I-270. It currently meets the criteria of a rustic road.	
	Timothy H. Cupples (MCDOT)	MCDOT does not believe that state roads should be rustic roads.	See discussion under State Roads above.
Old Orchard Road	Quentin Remein (CCA)	The CCA supports the rustic designation of Old Orchard Road.	Acknowledged.
	Timothy H. Cupples (MCDOT)	The end of Old Orchard Road is on the DBU list. MCDOT does not believe roads on the DBU list should be rustic roads	The road was added to the program before the DBU policy was created. Planning staff suggest the policy be updated to clarify how the road can be improved to be accepted for maintenance.
Peachtree Road	Steven Findlay (SCA)	We urge you to pay especially close attention to the preservation of this road, which is one of the “key bucolic pathways in the Ag Reserve.”	Acknowledged.
Poplar Hill Road	Carol Allen	Support continuance of road as rustic. Likes history of the road; wildlife sightings; natural beauty; enjoyment by cyclists, dog walkers, and joggers.	Acknowledged.

Road Name	Name(s)	Comments	Response
	Timothy H. Cupples (MCDOT)	All of Poplar Hill Road is on the DBU list. MCDOT does not believe roads on the DBU list should be rustic roads	The road was added to the program before the DBU policy was created. Planning staff suggest the policy be updated to clarify how the road can be improved to be accepted for maintenance. Planning staff suggests removing the rustic designation of the part of the road that has been removed.
Prescott Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe that park roads should be rustic roads because they are closed to traffic and function more as park trails.	See discussion under M-NCPPC Park Roads above.
Prices Distillery Road	Carole and Paul Bergmann	[Provided photos of road, farm field, and view of Sugarloaf Mountain at sunset.]	Acknowledged.
	Melanie and Steve Kurimchak	[Provided photos of a corn field at sunset and a rainbow over a cornfield.]	
Query Mill Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0020 and M-0329 should be significant features.	The bridges make a significant contribution to the character of the road. Staff recommends these designations remain.
River Road (Exceptional Rustic Segment)	Linda Lewis	River Road is currently unhealthy and unsafe. The gravel creates dust and contains asbestos. In Fall 2021, MCDOT tilled the road and added chemical to try to solve the dust problem, but the problem persists. Article 7 of Chapter 49 in the code states that “The Director of the Department of Public Works and Transportation may waive the maintenance and improvement guidelines above in the event of an emergency representing urgent and imminent threat to public safety.”  [Provided photos showing muddy road, water standing on road, and ice forming on road because of bad drainage.]	MCDOT is currently addressing this issue. County Code states that rustic roads must remain safe.
	Laura Van Etten (RRAC)	Ms. Van Etten provided additional background information on this issue.	
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0040 should be a significant feature.	The bridge makes a significant contribution to the character of the road. Staff recommends the designation remain.
River Road (Non-Rustic Segment)	Scott Plumer (DCA)	“The section of River Road from just west of the bridge over Seneca Creek to the junction of MD-190 River Road and MD-112 Seneca Road needs bikeable shoulders.”	This segment of River Road is not a rustic or exceptional rustic road.

Road Name	Name(s)	Comments	Response
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0038 and M-0039 should be significant features.	The bridges make a significant contribution to the character of the road. Staff recommends the designations remain.
Rocky Road	Paula Linthicum	[Provided photo showing vegetation encroaching into road.]	Acknowledged.
Schaeffer Road	Miriam Schoenbaum (BHS)	Maintain the eastern extent of Schaeffer Road between Burdette Lane and Central Park Circle/Germantown Park Drive. [Provided photo of one-lane bridge and Osage orange.]	This segment of Schaeffer Road has a very modern road design and should not remain in the program.
	Caroline Taylor (MCA)	Ms. Taylor requests that we not remove the easternmost block of Schaeffer Road from the program. Although the road was widened and drainage added, the road continues to meet the criteria for designation in the program, “and retaining this section helps to protect Burdette Lane and the nearby historic African American community of Brownstown.”  Ms. Saville agrees, stating that it still meets the criteria for a rustic designation. She is concerned that removing roads from the program that were “improved” despite their rustic status would set a bad precedent and encourage program detractors to continue changing these roads.	The section of Schaeffer Road recommended to be removed from the program does not have the visual character that defines rustic roads. This recommendation will be discussed at a work session.
Sugarland Lane / Sugarland Road	Dolores and Gregory Milmoe	[Provided photo of St. Paul Community Church / Sugarland Ethno History Project / cemetery.]	Acknowledged.
Sugarland Road	Robert Butz	[Provided photos showing patchwork pavement repairs, vegetation encroaching into the road, and damaged agricultural transport truck.]	Acknowledged.
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0034 and M-0035 should be significant features.	The bridges make a significant contribution to the character of the road. Staff recommends the designation remain.
Swains Lock Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0022 should be a significant feature.	The bridge makes a significant contribution to the character of the road. Staff recommends the designation remain.
Sycamore Landing Road	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridges M-0031 and M-0032 should be significant features.	The bridges make a significant contribution to the character of the road. Staff recommends the designation remain.

Road Name	Name(s)	Comments	Response
Tucker Lane	Bruce Clarke	People treat Tucker Lane like a speedway, making it very unsafe. Request for more police presence to patrol this road.	A master plan cannot dictate police procedures; any safety issues should be raised with MCPD. This plan supports traffic calming measures where necessary and should be discussed at a future stakeholder meeting to determine appropriate action.
Turkey Foot Road	Scott Plumer (DCA)	The termination of Turkey Foot Road at Darnestown Road (MD 28) is one of our main concerns. The historic Darnestown Presbyterian Church is at this intersection and adjacent to that is the area elementary school. These two properties are within the rural community civic and commercial core walkshed. We would like to see reduced conflicts along Turkey Foot Road in this area, including safer egress onto MD 28.	Any safety concerns along any road or intersection in the county should be raised with MCDOT and SHA. According to County Code, safety improvements are allowed along rustic roads.
Wasche Road	Eric Spates	[Provided photos showing ice patches where water has not drained from the road.]	Acknowledged.
West Harris Road	Indhu Balasubramaniam Jane Thompson	Support continuance of road as exceptional rustic, with its gravel surface, trees lining the road, and native plants.	Acknowledged.
	Barbara Hoover	[Provided photo of cyclists on the road.]	
	Michael Weigand	Mr. Weigand recommends that M-NCPPC and Montgomery County initiate a study of how to mitigate problems of gravel dust (health and visibility issues), erosion, drainage, and excessive potholes. He requests that solutions “be implemented in a manner that is sensitive to the desire for historic preservation, to the extent possible without compromising these paramount concerns.”	Safety issues on rustic roads, by County Code, must be addressed. The issues raised should be discussed with MCDOT, who may decide the issue should be discussed with the RRAC to determine the best solution.
West Hunter Road	Laura Van Etten (RRAC)	Please add language to the significant features and also add to the map: “roadside vegetation and mature forest east of Hilliard Farm on south side of road” (the forest does appear on the map)	Planning staff has reviewed this request and believes that the roadside vegetation does not rise to the level of making it a significant feature.  2019 aerial photographs were used to create the forested layer on the profile maps. The forested areas of the West Hunter Road map align with the latest aerial photography.
West Old Baltimore Road	Barbara Hoover	[Provided as example in testimony, including photo.]	Acknowledged.
	Steven Findlay (SCA)	We urge you to pay especially close attention to the preservation of this road, which is one of the “key bucolic pathways in the Ag Reserve.”	Acknowledged.

Road Name	Name(s)	Comments	Response
	Robert W. and Elizabeth R. Wilbur	We use this road regularly for walks and as a connector to trails. We appreciate it's historic significance, tree canopy, views, and the gravel section that includes the last remaining ford in the county.	
West Willard Road	Michael Jamison	[Provided photos showing how difficult it can be to move large agricultural equipment down the road because of its narrowness and encroaching vegetation.]	Acknowledged.
White Ground Road	Eric Spates	[Provided photo showing ice patches where water has not drained from the road.]	Acknowledged.
	Miriam Schoenbaum (BHS)	[Provided photos of historic and natural sites and features along the road.]	
	Steven Findlay (SCA)	We urge you to pay especially close attention to the preservation of this road, which is one of the "key bucolic pathways in the Ag Reserve."	
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0048 should be a significant feature.	The bridge makes a significant contribution to the character of the road. Staff recommends the designation remain.
Whites Ferry Road	Sarah L. Rogers (HM)	The Warren Historic site in Martinsburg is a great example of a historic site that can be reached from rustic roads. It is an early post-Civil War freedmen's community, with a one-room schoolhouse, church, and a benefit society lodge hall.	Acknowledged.
Wildcat Road	Wade Butler	[Provided photos showing crashes, a dump truck parked along the road at night with no lights, and a section near the creek in need of maintenance.]	Acknowledged.
	Laura Van Etten (RRAC)	Please add Bridge No. M-0068 in traveling experience.	This bridge is already mentioned in the traveling experience.
	Timothy H. Cupples (MCDOT)	MCDOT does not believe bridge M-0068 should be a significant feature.	The bridge makes a significant contribution to the character of the road. Staff recommends the designation remain.