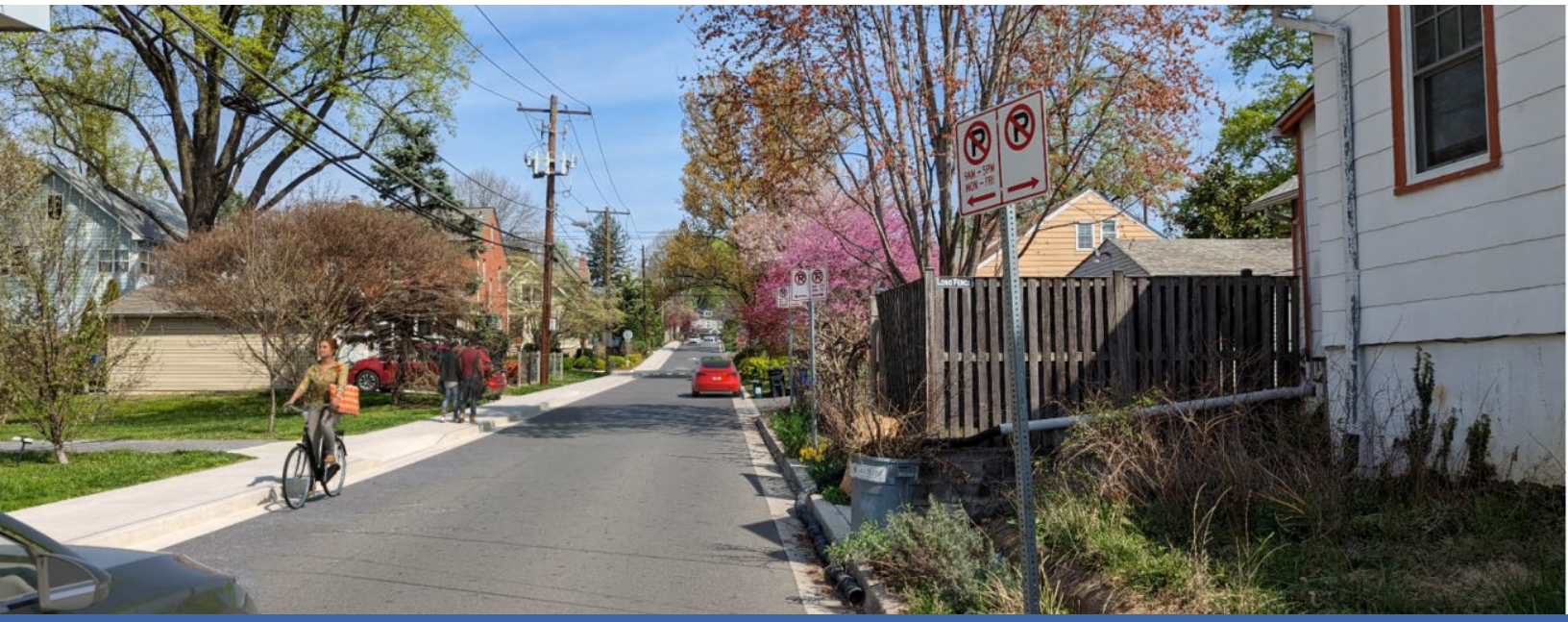
Montgomery Planning

MANDATORY REFERRAL NO. 2024019 – EAST SILVER SPRING NEIGHBORHOOD GREENWAY



Description

This is a Mandatory Referral review for the Montgomery County Department of Transportation proposal to create a neighborhood greenway on multiple streets adjacent to Downtown Silver Spring: Woodbury Avenue, Sligo Avenue, Grove Street, Bonifant Street, Cedar Street, and Houston Street.

No. MR2024019	MCPB Item 10 09/12/2024	2425 Reedie Drive Floor 14 Wheaton, MD 20902

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LOCATION

Woodbury Avenue, Sligo Avenue, Grove Street, Bonifant Street, Cedar Street, and Houston Street in Silver Spring

MASTER PLANS

2018 *Bicycle Master Plan,* 2018 *Master Plan of Highways and Transitways*, 2000 *Silver Spring East Master Plan*

APPLICANT

Montgomery County Department of Transportation

ACCEPTANCE DATE

June 7, 2024

REVIEW BASIS

Md. Land Use Article, Section 20-301, et seq.

Summary

- This is a Montgomery County Department of Transportation project to create a neighborhood greenway on multiple streets in Silver Spring.
- The proposed project is funded through General Obligation Bonds in the county's Capital Improvements Program.
- Montgomery Planning Staff recommends approval of the Mandatory Referral with comments and transmittal of comments to the Montgomery County Department of Transportation.
- The Planning Board review of a Mandatory Referral is pursuant to the Land Use Article of the Maryland Annotated Code, Section 20-301, et seq.

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SECTION 1 – RECOMMENDATIONS

Planning Staff recommends transmittal of the following comments to the Montgomery County Department of Transportation:

Transportation Recommendations

1. Construct directional curb ramps with detectable warning surfaces at the traffic circle intersection of Woodbury Drive, Violet Place, and Richmond Avenue.
2. Construct right-in right-out splitters at all entrances to the traffic circle intersection of Woodbury Avenue and Gist Avenue to control traffic speeds and direction.
3. Construct a raised intersection at Sligo Avenue and Woodbury Drive and a raised crosswalk at Sligo Avenue and Grove Street to prioritize pedestrian and bicyclist crossings.
4. Remove stop control along the neighborhood greenway corridor while providing traffic calming treatments to prioritize bike traffic.
5. Reconfigure the intersection of Bonifant Street, Grove Street, and Hankin Street by making Hankin Street one-way.
6. Expand the traffic circle at the intersection of Cedar Street, Houston Street, and Bonifant Street to reduce pavement width and slow vehicle traffic.
7. Construct a curb extension and a right-out-only exit at the intersection of Dartmouth Avenue and Cedar Street.
8. Tighten curb radii to 15 feet and provide directional curb ramps at all intersections as described in the 2024 *Complete Streets Design Guide*.

Environmental Recommendations

1. MCDOT will submit a Final Tree Save Plan to Montgomery Planning for review and approval during the final (100%) design phase of the project.

Parks Recommendations

1. Remove the existing asphalt apron in the shoulder of Houston Street (Station 206+45 to Station 206+75) and provide stable conveyance of stormwater runoff into the outflow channel on parkland.

SECTION 2 – PROJECT DESCRIPTION

Project Description

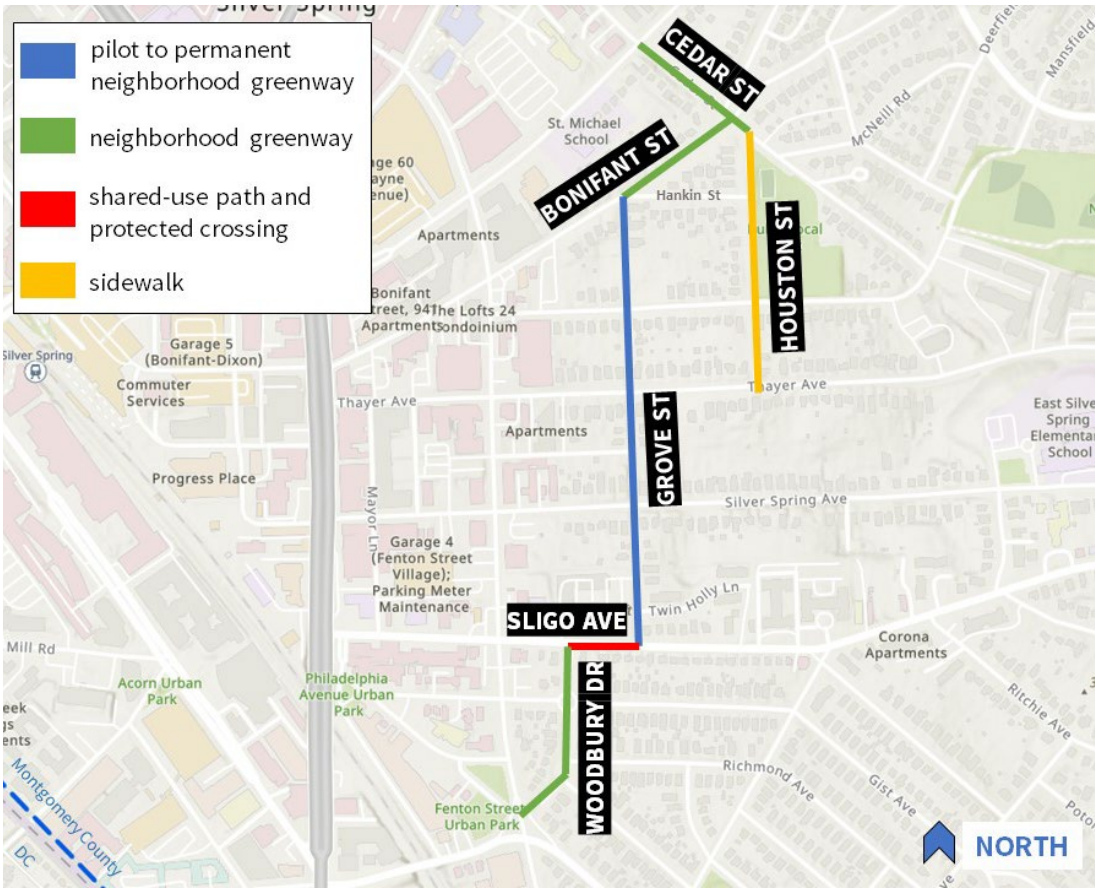
The Montgomery County Department of Transportation (MCDOT) proposes to construct a neighborhood greenway to improve safety for bicyclists and pedestrians on multiple streets in Silver

Spring connecting Wayne Avenue and Fenton Street: Woodbury Drive (from Philadelphia Avenue to Sligo Avenue), Sligo Avenue (from Woodbury Drive to Grove Street), Grove Street (from Sligo Avenue to Bonifant Street), Bonifant Street (from Grove Street to Cedar Street), Cedar Street (from Bonifant Street to Wayne Avenue), and Houston Street (from Thayer Avenue to Bonifant Street). The total project length is approximately one mile and is identified in Figure 1 below. The colored line-segments in Figure 1 identify the different treatments proposed for each road section, described as follows:

- Grove Street (blue):
    - Improve upon an existing pilot project by constructing a five-foot sidewalk and permanent neighborhood greenway treatments
- Cedar Street, Bonifant Street, Woodbury Avenue (green):
    - Construct neighborhood greenway treatments with intersection improvements
- Houston Street (yellow):
    - Construct a five-foot sidewalk
- Sligo Avenue (red):
    - Construct a 10-foot shared-use path and a protected crossing

Complete engineering drawings for the project are found in *Attachment A*.

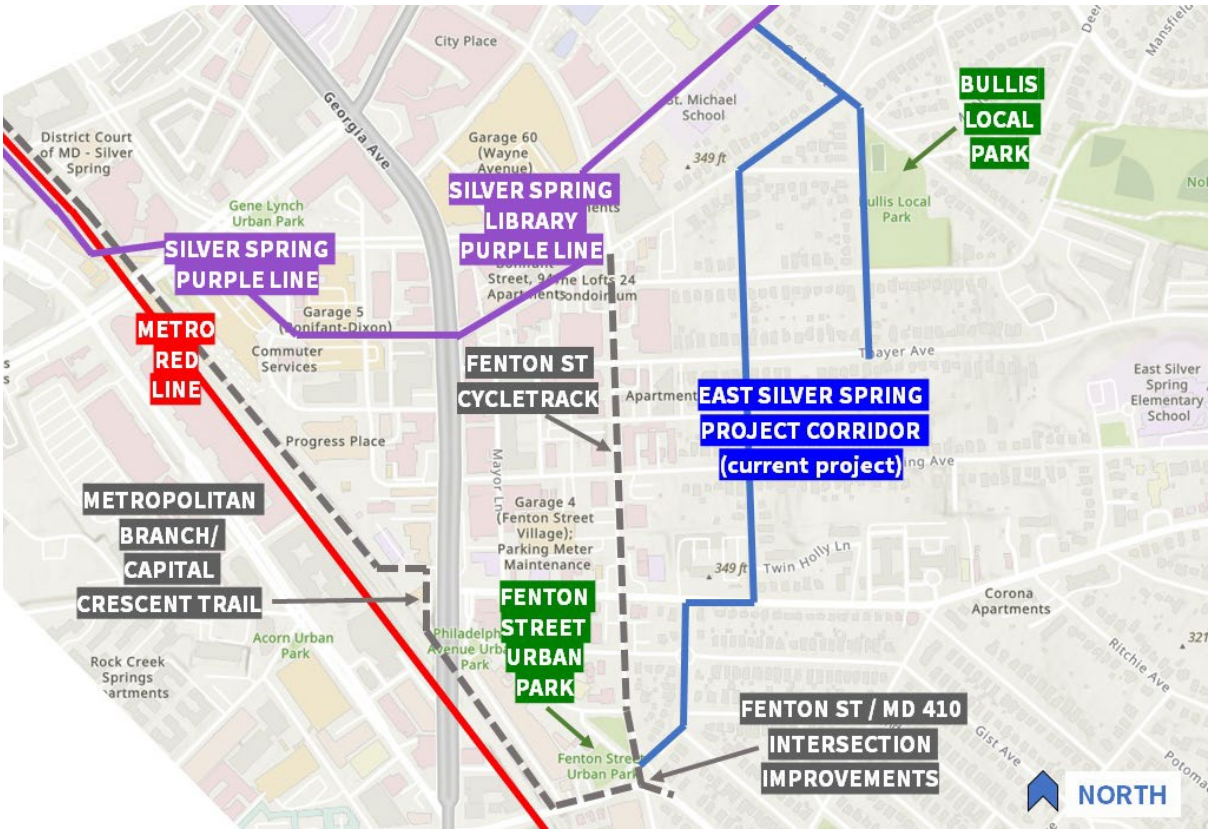
Figure 1: Project Area Map



Background

The proposed project is recommended as a Tier 1 bikeway[1] in the 2018 *Bicycle Master Plan*—the highest assigned priority. This neighborhood greenway is part of a much larger bicycle network in the Silver Spring Central Business District (CBD) that will include separated bicycle lanes on Fenton Street and the completion of the Metropolitan Branch / Capital Crescent Trail system. These connections will provide access to jobs, local businesses, and Metrorail Red Line and MDOT Purple Line stations. The bikeway is fully funded for design and construction using General Obligation Bonds in the county Capital Improvement Program.

Figure 2: Adjacent Transportation Connections and Parks



NEIGHBORHOOD GREENWAY

Per the *Montgomery County Bicycle Master Plan* (2018), neighborhood greenways are streets with low motorized traffic volumes and speeds, designed and designated to give people walking and bicycling priority. They typically parallel busy streets, where safe and comfortable bicycling accommodations

[1] Tier 1 represents the highest priority bikeways and Tier 4 represents the lowest priority bikeways, as defined in the 2018 *Bicycle Master Plan*.

may not be present. Neighborhood greenways use signs, pavement markings, and speed and volume management measures to calm traffic and discourage through-trips by motor vehicles to create safe, convenient corridors for pedestrians and bicyclists. Design elements can include traffic diverters at key intersections, traffic circles or mini-roundabouts, traffic calming, shared lane markings, crossing improvements, and wayfinding signage to guide bicyclists along the route and to key destinations, among other things. The streets included in this project, except Houston Street, are designated as neighborhood greenways in the *Bicycle Master Plan*. For examples of neighborhood greenway design elements, please see *Attachment B: Neighborhood Greenways Overview.*

Surrounding Neighborhood

The surrounding neighborhood is mainly single-family residential homes, with some townhomes and multifamily residences. There is regular public transportation service in the vicinity, including the Metrorail Red Line, MARC Brunswick Line, future MTA Purple Line stations and nearby local bus stops. The project corridor parallels or intersects three state highways: Georgia Avenue (MD 97/ US 29), Wayne Avenue (MD 594), and East West Highway / Burlington Avenue / Philadelphia Avenue (MD 410). Nearby schools include East Silver Spring Elementary School and Montgomery College. Nearby parks include Bullis Local Park and Fenton Street Urban Park.

Most streets included in the proposed project are classified as Neighborhood Streets – residential streets with low volumes of motor vehicle traffic. Sligo Avenue is the only project street classified as a Neighborhood Connector – residential through streets with slightly higher traffic volumes that are intended to convey more through traffic.

The posted speed limit on all streets within the project area, except Grove Street, are 25 miles-per-hour. Grove Street is posted at 20 miles-per-hour. Between 2015 and 2023, there were 29 collisions within the project area.[2] Six involved pedestrians and two involved bicycles. One crash at the intersection of Cedar Street and Wayne Avenue was severe, and none were fatal.

Typical walking conditions in the project area range from “very comfortable” to “uncomfortable” (Pedestrian Level of Comfort 1, 2, or 3)[3]. While there are low traffic volumes on these streets, there are also some sections that do not have sidewalks. Bicycling conditions on these same streets are generally “very low stress” (Bicycle Level of Traffic Stress 1)[4] due to low traffic volumes.

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[2] Source: Montgomery County Interactive Crash Map (2023). https://mcplanning.maps.arcgis.com/apps/webappviewer/index.html?id=3bec8ba90fca4cc182cc042ed38af0e7

[3] Pedestrian Level of Comfort Scores include the following: 1 = very comfortable; 2 = somewhat comfortable; 3 = uncomfortable; 4 = undesirable

[4] Bicycle Level of Traffic Stress Scores include the following: 1 = very low stress; 2 = low stress; 3 = moderate high stress; 4 = high stress; 5 = very high stress

PARKLAND AND NATURAL RESOURCES DESCRIPTION

Bullis Local Park fronts the project area, and its main function is as a community gathering space, with a soccer field, tennis court, and children's playground. Trees within this park help with shading and cooling the neighborhood and provide some stormwater value. The proposed project will not reduce these benefits, but there are existing stormwater challenges that could worsen if not remediated as part of this project (see *Section 4: Mandatory Referral Analysis and Findings, Parks Department*). Bullis Local Park drains to Sligo Creek, and most of the stormwater in the watershed is untreated. The proposed project will enhance walking and biking connections to all parks surrounding the Silver Spring downtown.

SECTION 3 – MANDATORY REFERRAL AUTHORITY AND PROCESS

Mandatory Referral review is guided by the Montgomery Planning Mandatory Referral Review Uniform Standards (December 2022), and the authority granted through the Maryland Land Use Article, Section 20-301, et.seq. Subject to Sections 20-303 and 20-304 of this subtitle, a public board, public body, or public official may not conduct any of the following activities in the regional district unless the proposed location, character, grade, and extent of the activity is referred to and approved by the Commission:

(1) acquiring or selling land;
(2) locating, constructing or authorizing:
    a. a road;
    b. a park;
    c. any other public way or ground;
    d. a public building or structure, including a federal building or structure; or
    e. a publicly owned or privately owned public utility; or
(3) changing the use of or widening, narrowing, extending, relocating, vacating, or abandoning any facility listed in item (2) of this section.

The Planning Board must review such projects and transmit comments on the proposed location, character, grade and extent of the activity to the project applicant.

As described in the Uniform Standards, the Planning Board considers all relevant land use and planning aspects of the proposal including, but not limited to, the following:

(1) whether the proposal is consistent with the County's General Plan, functional plans, the approved and adopted area master plan or sector plan and any associated design guidelines, and any other public plans, guidance documents, or programs for the area;

(2) whether the proposal is consistent with the intent and the requirements of the zone in which it is located;

(3) whether the nature of the proposed site and development, including but not limited to its size, shape, scale, height, arrangement, design of structure(s), massing, setback(s), site layout, and location(s) of parking is compatible with the surrounding neighborhood and properties;

(4) whether the locations of buildings and structures, open spaces, landscaping, recreation facilities, and pedestrian and vehicular circulation systems are adequate, safe, and efficient;

(5) whether the proposal has an approved NRI/FSD and a preliminary SWM Concept Plan, and meets the requirements of the Forest Conservation law (Chapters 19 and 22A of the Montgomery County Code);

(6) whether a Preliminary or a Final Water Quality Plan has been reviewed by the Planning Board if the project is located in a Special Protection Area. In addition, for a Water Quality Plan on public property, the Board must determine if the plan meets any additional applicable standards for Special Protection Areas;

(7) whether or not the site would be needed for park use if the proposal is for disposition of a surplus public school or other publicly-owned property; and

(8) whether alternatives or mitigation measures have been considered for the project if the proposal is inconsistent with the General Plan or other plans and policies for the area, or has discernible negative impacts on the surrounding neighborhood, the transportation network, the environment, historic resources (including burial sites), or other resources.

SECTION 4 – MANDATORY REFERRAL ANALYSIS AND FINDINGS

Master Plan Consistency

As described in the Uniform Standards outlined in Section 3 of this staff report, the Planning Board considers whether the proposal is consistent with the County's General Plan, *Thrive Montgomery 2050*, functional plans, area master plans, and any associated design guidelines.

The proposed bikeway is consistent with the 2018 *Bicycle Master Plan*. The 2018 *Bicycle Master Plan* recommends the "Wayne Avenue to Fenton Street Neighborhood Greenway" as a Tier 1 bicycle facility, the highest implementation priority. As shown in the following table, the *Bicycle Master Plan* recommends a separated bicycle facility on Sligo Avenue and neighborhood greenway treatments on all other streets included in the project. Houston Avenue does not have any recommended bicycle facilities in the *Bicycle Master Plan*; it was added to the proposed project by neighborhood request.

The proposed design on Sligo Avenue includes a 10' minimum sidepath instead of the master-planned separated bike lanes. However, given that the separated bike lane is planned only for the one-block segment of Sligo Avenue between Grove Street and Woodbury Drive and not part of a longer corridor,

a sidepath is also acceptable. The proposed treatments on all other streets align with master planned neighborhood greenway standards.

Table 1: Wayne Avenue to Fenton Street Neighborhood Greenway Bicycle Master Plan Recommendations

Street	From	To	Bicycle Facility
Cedar Street	Wayne Avenue (MD 594-A)	Bonifant Street	neighborhood greenway
Bonifant Street	Cedar Street	Grove Street	neighborhood greenway
Grove Street	Bonifant Street	Sligo Avenue	neighborhood greenway
Sligo Avenue	Grove Street	Woodbury Drive	separated bike lanes (two-way, side TBD)
Woodbury Drive	Sligo Avenue	Neighborhood Connector	neighborhood greenway
Neighborhood Connector	Woodbury Drive	Fenton Street	neighborhood connector

Other Mandatory Referral Uniform Standard Findings

Regarding the other aspects outlined in the Uniform Standards in Section 3 of this staff report, not all apply to mandatory referrals for public transportation projects. The project is consistent with the aspects of the Uniform Standards listed below, and reasoning is provided. All other aspects are not applicable to this project.

(1) Consistency with the intent and the requirements of the existing zoning

- The proposed project is consistent with the existing residential zones. It will improve safety and access to the existing land uses and support future development consistent with the zoning.

(2) Compatibility with the surrounding neighborhood and properties

- The design and layout of the proposed project is compatible with the surrounding neighborhood and will improve travel conditions to the standard outlined in master plans for the area.

(3) Adequacy, safety, and efficiency of landscaping and pedestrian and vehicular circulation

- The entire project aims to improve safety and efficiency of the transportation network in the project area.

(4) Approval of NRI/FSD, preliminary SWM Concept Plan, and Forest Conservation law compliance

- The project meets these requirements. A forest conservation exemption request was granted under Section 22A-59(e) as a "county and municipal highway project." The stormwater management concept for the project was approved by the Department of Permitting Services (DPS).

Transportation Best Practices

COMPLETE STREETS DESIGN GUIDE

The *Complete Streets Design Guide* (CSDG) provides additional design guidance for different types of streets, including neighborhood greenways. This guidance includes minimum and preferred facility widths and spacing for protected crossings. Neighborhood greenways have fewer prescribed facility widths and requirements; instead, CSDG guidance focuses on preferred designs for traffic calming features.

Sligo Avenue is the only project street classified as a busier, Neighborhood Connector, and warrants a review of facility widths and protected crossing spacing. The project is proposing a 10-foot sidepath on the north side of Sligo Avenue with a variable street buffer between three feet and seven feet. To accommodate this sidepath and slow vehicle speeds, the vehicle lanes will be reduced from 12 feet to between nine and 11 feet. These widths are generally consistent with the *Complete Streets Design Guide*. Besides this new sidepath, the only other roadway improvements proposed are a new protected crossing at Woodbury Drive and an additional crosswalk at Grove Street. The new protected crossing at Woodbury Drive will reduce the protected crossing spacing from the existing 3,900 feet between Fenton Street and Piney Branch Road to 300 feet between Fenton Street and Woodbury Drive. This meets the CSDG standard of 600-foot maximum spacing between protected crossings on a Neighborhood Connector.

Most of this project consists of low volume, neighborhood greenways, and the main benefit of the proposed design concerns traffic calming. The proposed treatments— including roadway narrowing, speed humps, and traffic circles—are consistent with neighborhood greenway guidance in the *Complete Streets Design* Guide.

PEDESTRIAN LEVEL OF COMFORT AND BICYCLE LEVEL OF TRAFFIC STRESS

The Planning Department developed the Pedestrian Level of Comfort (PLOC) and Bicycle Level of Traffic Stress (BLTS) to assess walking conditions in the county and help prioritize and track the impact of improvement projects. One shortcoming of these methodologies is that they are not yet able to quantify the benefits that neighborhood greenways provide on many residential streets with relatively low-stress existing conditions. For this reason, this project does not result in major improvements in the PLOC and BTLS scores. However, the proposed neighborhood greenway includes traffic calming elements like speed humps and roadway narrowing that increase the likelihood that motor vehicles will achieve the 20 mile-per-hour posted speed limits on these roads.

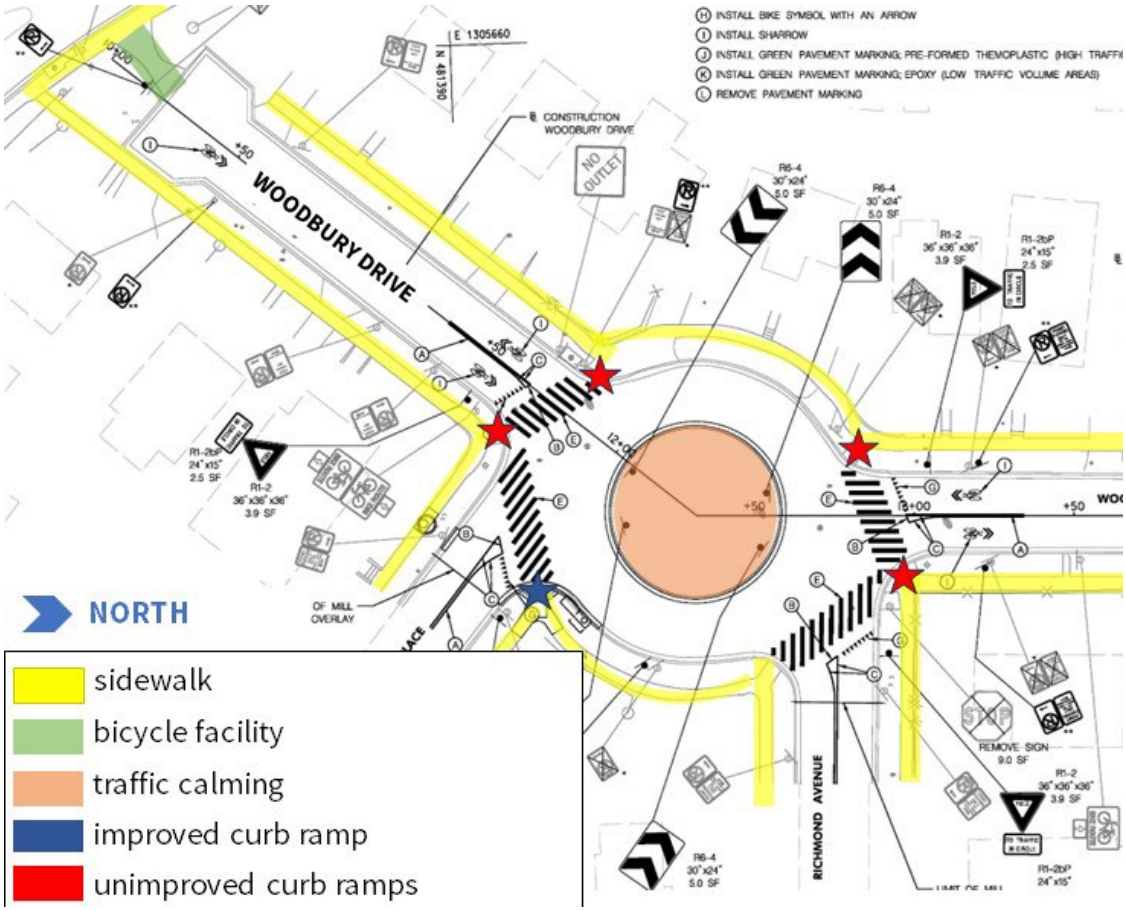
TRANSPORTATION COMMENTS

The orientation of project drawings in this section varies; a north-arrow is provided in each figure. In each project drawing, the following colors are used to identify different elements of the Active and Street Zones: sidewalks are yellow, bicycle facilities are green, parking lanes and other neighborhood

greenway treatments are orange, recommended curb extensions and explanatory details are blue, and issue areas or recommendation locations are called-out with red shapes.

1. **Construct directional curb ramps with detectable warning surfaces at the traffic circle intersection of Woodbury Drive, Violet Place, and Richmond Avenue.** The project will upgrade one curb ramp (shown with a blue star in Figure 3), but other curb ramps remain untouched or misaligned, shown with red stars in Figure 3.

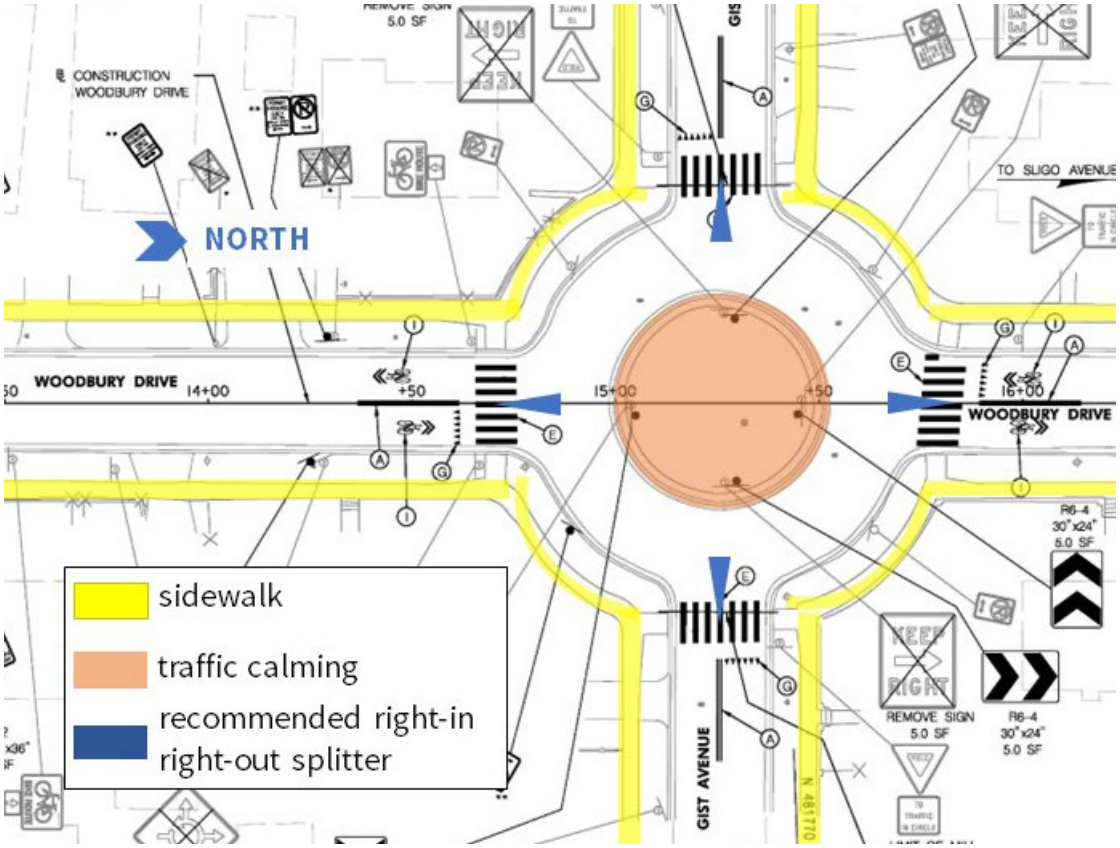
Figure 3: Traffic Circle on Woodbury Drive and Bike/Pedestrian Connection to Fenton Street



2. **Construct right-in right-out splitters at all entrances to the traffic circle intersection of Woodbury Avenue and Gist Avenue to control traffic speeds and direction.** The applicant is not proposing any changes to this traffic circle. The existing travel lanes are 20-feet-wide, and it is possible for vehicles coming from Fenton Street on Gist Avenue to enter the traffic circle in the wrong direction to turn north onto Woodbury Drive. Right-in right-out splitters, shown in Figure 4

in blue, would provide traffic calming and force vehicles to use the traffic circle in the proper direction.

Figure 4: Traffic Circle Intersection of Woodbury Drive and Gist Avenue with Recommended Traffic Calming

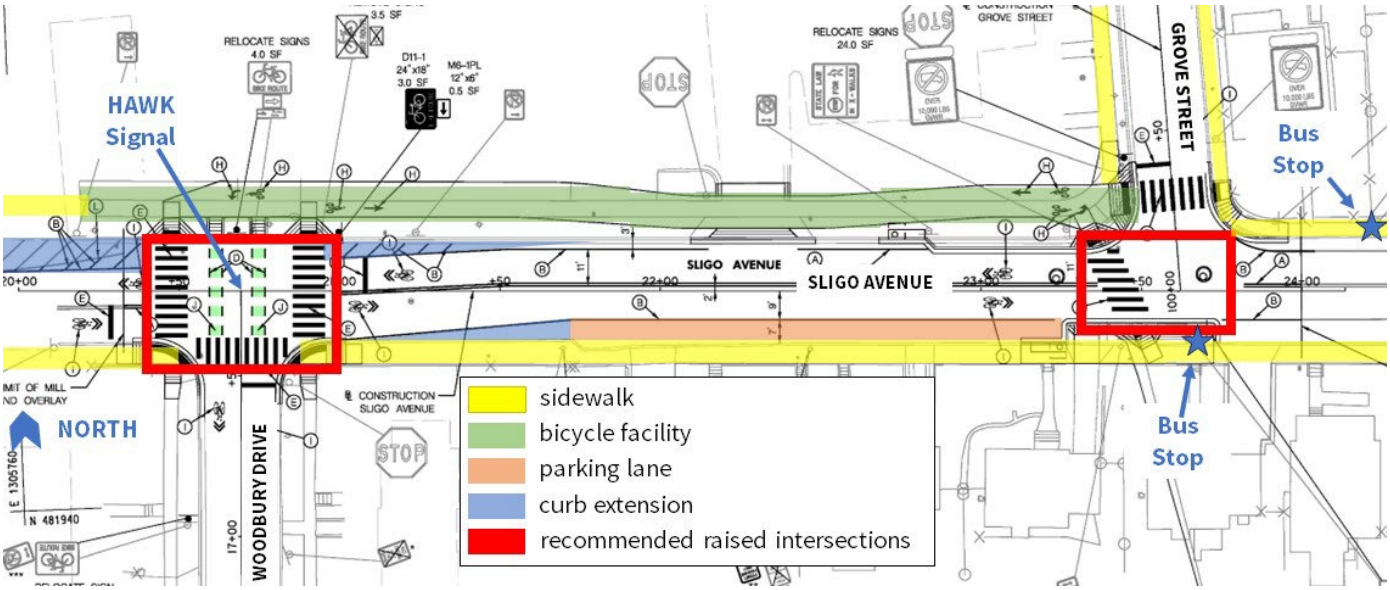


3. **Construct raised intersections at Sligo Avenue and Grove Street and Sligo Avenue and Woodbury Drive to prioritize pedestrian and bicyclist crossings**. The applicant does not include any proposed changes to the Sligo Avenue and Grove Street intersection, which currently has a high visibility crosswalk but lacks traffic control (traffic signals or stop signs). This crossing is the most direct place for transit riders to access the bus stops at this intersection, and it would benefit from additional traffic control. The applicant proposes to improve pedestrian and bicycle crossings of Sligo Avenue at Woodbury Drive by installing crosswalks, stop bars, and a HAWK signal, while narrowing the travel lane by striping excess pavement on Sligo Avenue, as shown in Figure 5.

   To reduce vehicle speeds and improve safety—especially at the Grove Street intersection—construct raised intersections, shown as red outlines in Figure 5. Raised intersections would also

act as beneficial gateway treatments to slow vehicles as they enter downtown Silver Spring. This treatment will create additional stormwater issues to be addressed.

Figure 5: Sligo Avenue with Shared-Use Path and Intersection Treatments



4. **Remove stop control along the neighborhood greenway corridor while providing traffic calming treatments to prioritize bike traffic.** One neighborhood greenway design feature is to minimize the need for bicyclists to come to a full stop, as accelerating from frequent stops is strenuous—especially on hills.[5] Per the *Bicycle Master Plan* (2018), "At two-way, stop-controlled intersections, [provide] priority assignment that favors the neighborhood greenway, so bicyclists can ride with few interruptions" (page 63). Since the proposed project includes speed humps (shown in Figure 6 in orange) and roadway narrowing (shown in Figure 7 in orange), the project team should consider removing some stop signs along Grove Street. MCDOT could continue monitoring traffic speeds after implementation to determine if additional treatments are needed to control traffic speeds. Additional traffic calming treatments could include not only more speed humps and roadway narrowing, but also chicanes or raised crosswalks.

[5] For more information, see *Why Bicyclists Hate Stop Signs*, Joel Fajans and Melanie Curry, https://nacto.org/wp-content/uploads/2012/06/Fajans-J.-and-M.-Curry.-2001..pdf

Figure 6: Section of Grove Street with a Speed Hump and Stop-Controlled Intersection

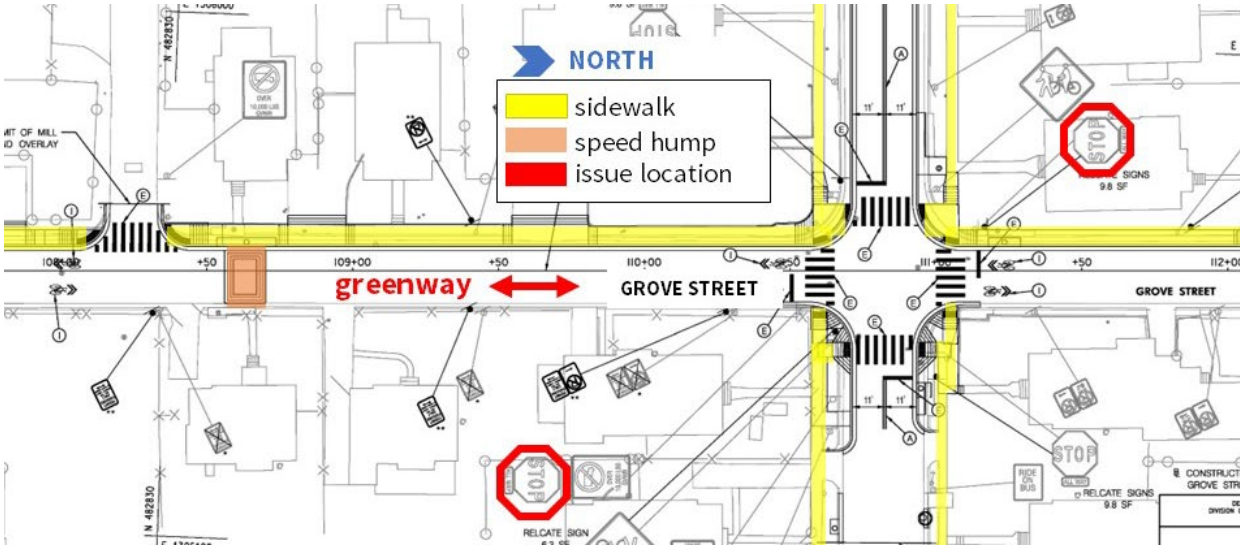
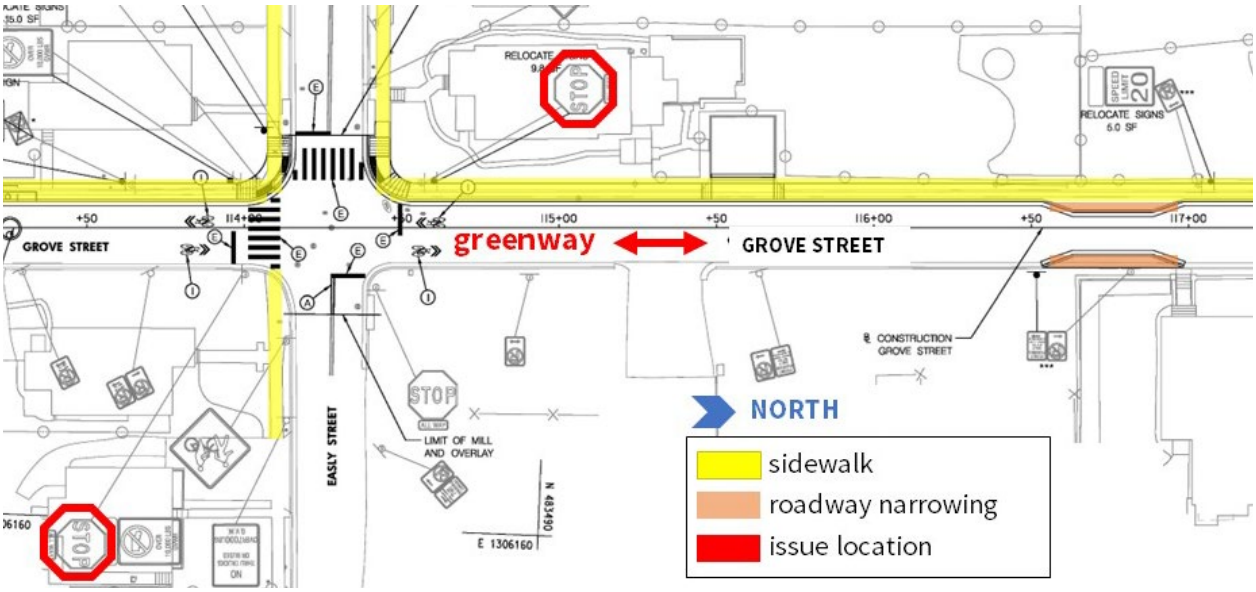


Figure 7: Section of Grove Street with Roadway Narrowing and Stop-Controlled Intersection



5. **Maintain clear sight distance at the intersection of Bonifant Street, Grove Street, and Hankin Street**. The applicant proposes to improve this intersection by installing a permanent curb extension (shown in blue in Figure 8) and realigning the stop bar on Grove Street. However, there is existing vegetation which could obstruct sight lines between motorists stopped at Grove Street and those stopped at Hankin Street (Figure 9). Maintain clear sight distance at all intersection approach legs.

Figure 8: Intersection of Bonifant, Grove, and Hankin with Sight Distance Issue

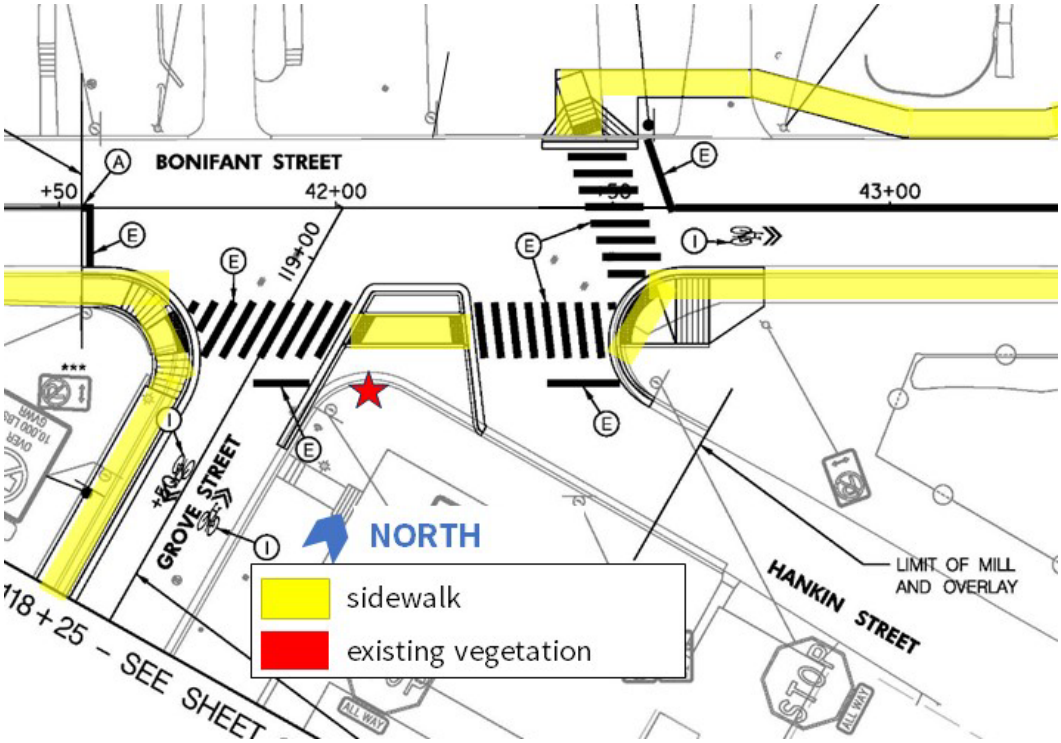
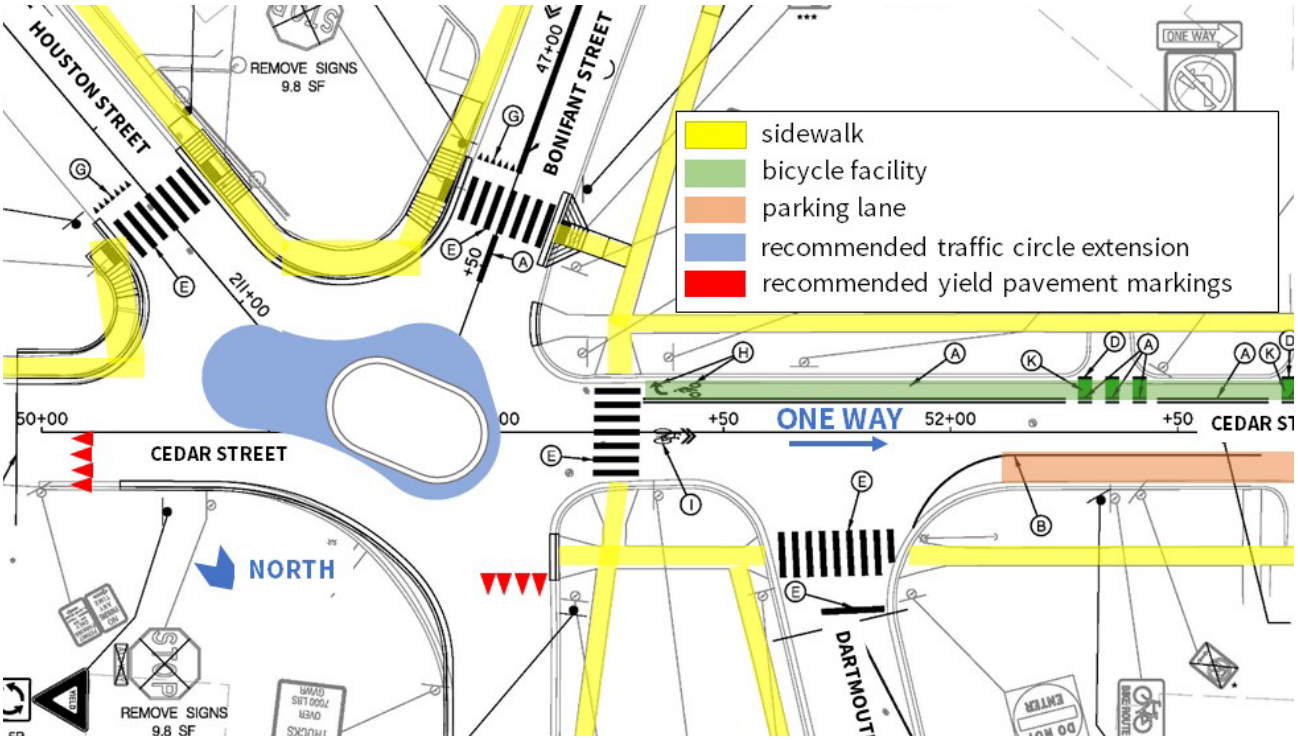


Figure 9: Google Streetview of the Corner of Grove Street and Hankin Street with Sight Distance Issue

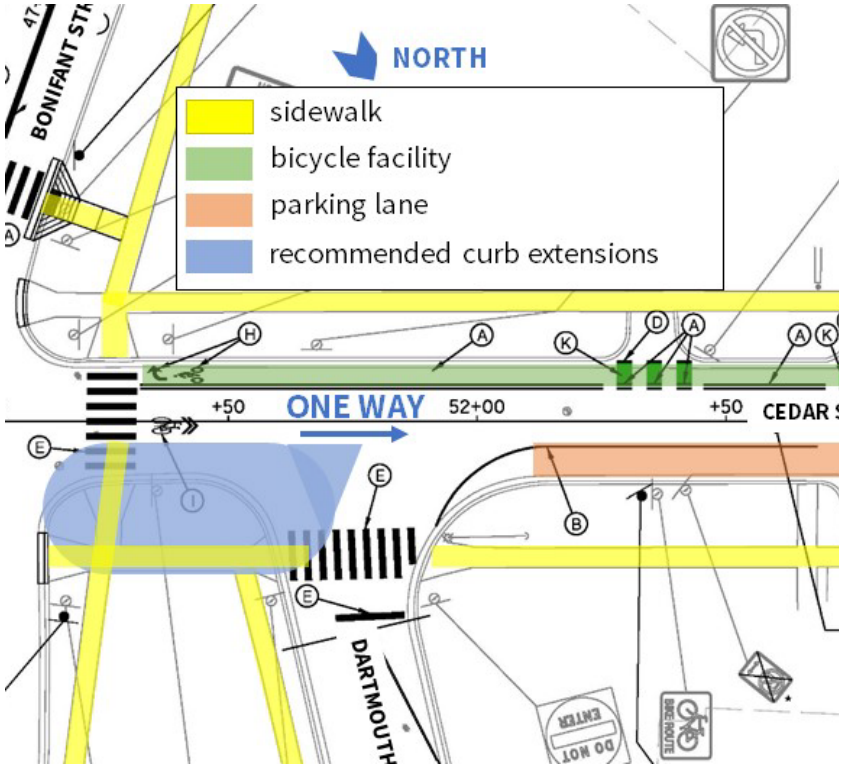
6. **Expand the traffic circle at the intersection of Cedar Street, Houston Street, and Bonifant Street to reduce pavement width and slow vehicle traffic**. Due to the configuration of this five-way intersection, there is excessive pavement in the middle of the intersection. The neighborhood greenway project proposes to convert this intersection to a traffic circle while continuing to allow all intersection movements. It will simply channelize these movements in a circular direction and make movements by motor vehicles, pedestrians, and bicyclists more predictable. To further improve the flow of traffic through the intersection, consider expanding the proposed traffic circle to reduce the amount of open pavement, as shown in solid blue in Figure 10. MCDOT proposes a mountable traffic circle; this could still be possible with an expanded footprint. Yield roadway markings on Cedar Street and Bonifant Street should be provided in addition to the proposed yield signs.

Figure 10: Intersection of Cedar, Houston, and Bonifant with Extended Traffic Circle



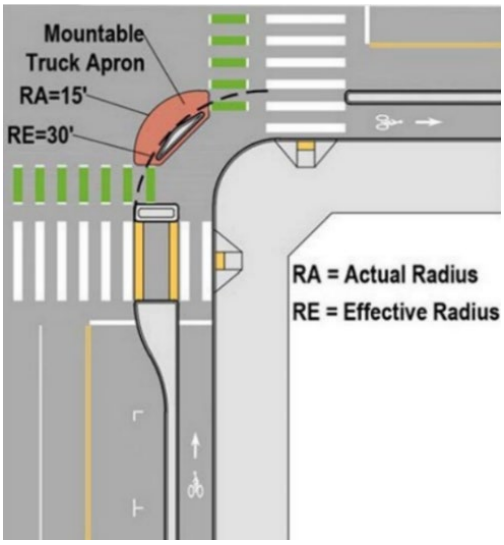
7. **Construct a curb extension and a right-out-only exit at the intersection of Dartmouth Avenue and Cedar Street** (Figure 11). This will reduce the vehicle lane width and ensure that vehicles can turn only right, in the direction of one-way traffic on Cedar Street.

Figure 11: Dartmouth Avenue and Cedar Street Intersection with Recommended Treatments



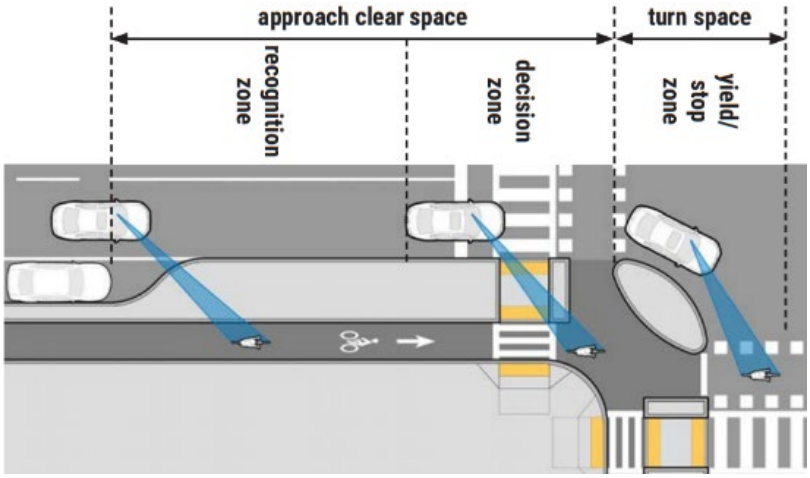
8. **Tighten curb radii to 15 feet and provide directional curb ramps at all intersections as described in the 2024 *Complete Streets Design Guide*.** Concerning curb ramps, the *Guide* states that "the preferred standard is two perpendicular curb ramps per corner, each aligning with desired paths of travel." Guidance for turning radii includes that "designers should assume a maximum 10 miles per hour turning speed for passenger cars and a 5 miles per hour for all other vehicles." Where wider turning radii may be helpful for larger vehicles or emergency operations, consider the use of mountable curbs or relocating the receiving leg stop bar to allow for encroachment, as shown in Figure 12.

Figure 12: Mountable Truck Apron Curb Radius (Photo: ODOT)



Providing tight turning radii is essential to reducing the turning speed of motor vehicles, improving visibility among motorists, pedestrians, and bicyclists, and reducing the likelihood and severity of collisions between roadway users. Figure 13 illustrates how tighter turning radii improve visibility by allowing motorists to cross bikeways, sidewalks, and sidepaths at a perpendicular angle so potential conflicts can be seen through the front windshield, not over a shoulder. Additionally, smaller curb radii shorten pedestrian street crossings, reducing their exposure to conflict, and make it easier to provide directional curb ramps to better guide pedestrians in the crosswalk through an intersection. Where wider turning radii may be helpful for larger vehicles or emergency operations, consider the use of mountable curbs or relocating the receiving leg stop bar to allow for encroachment.

Figure 13: Tighter Curb Radii Visibility Illustration



Environment

The project conforms to the Planning Board-approved Environmental Guidelines for Environmental Management of Development in Montgomery County.

The Property is located within the Sligo Creek Watershed, which is a Use I watershed.[6] There are no stream buffers, wetlands, or 100-year floodplains on-site. The soils on the property are classified as urban land and are not considered highly erodible or sensitive. There are no known rare, threatened, or endangered species on the Property.

Any environmental impacts have been minimized to the greatest extent possible but are necessary and unavoidable to achieve the design standards of the proposed bikeway. The following sections evaluate project compliance with forest conservation and stormwater management regulations.

FOREST CONSERVATION

The project is subject to Chapter 22A, Montgomery County Forest Conservation Law, but exempt from Article II and from the submission of a forest conservation plan under Section 22A-5(e) as a "county and municipal highway project." Therefore, a Forest Conservation Exemption request Plan No. 42024072E was granted under Section 22A-5(e) on May 23, 2024. While the project is exempt from Article II of the Forest Conservation Law, the Applicant is still required under section 22A-9 of Chapter 22A of the County Code to prepare a plan that demonstrates:

a) General.
    a. This Section applies to construction of a highway by the County or a municipality as part of an approved Capital Improvements Program project.
    b. The construction should minimize forest removal, land disturbance, and loss of significant, specimen, or champion trees to the extent possible while balancing other design, construction, and environmental standards. The constructing agency must make a reasonable effort to minimize land disturbance to avoid the cutting or clearing of trees and other woody plants.
b) If the forest to be cut or cleared for a County highway project equals or exceeds 20,000 square feet, the constructing agency must reforest a suitable area at the rate of one acre of protected reforestation for each acre of forest cleared.

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[6] *Use I: WATER CONTACT RECREATION, AND PROTECTION OF NONTIDAL WARMWATER AQUATIC LIFE*

Waters that are suitable for: water contact sports: play and leisure time activities where the human body may come in direct contact with the surface water; fishing; the growth and propagation of fish (other than trout); other aquatic life, and wildlife; agricultural water supply, and industrial water supply.

c) Reforestation for County highway projects must meet the standards in subsections 22A-12(e), (g) and (h).
d) Any mitigation requirement for loss of significant, specimen, or champion trees must be based on the size and character of the tree.

The exemption includes a required Tree Save Plan. Because East Silver Spring Neighborhood Greenway plans under review are only at the 35% design stage, the Tree Save Plan is preliminary. MCDOT will submit a Final Tree Save Plan to Planning Staff for review and approval during the final (100%) design phase of the project. A final Tree Save Plan must be submitted and approved by Planning Staff prior to clearing, grading, or demolition for each phase of construction.

STORMWATER MANAGEMENT

The stormwater management concept for the project was approved by the Department of Permitting Services (DPS) on May 10, 2024. The Applicant requested a waiver in-lieu of meeting required stormwater management goals. The following items will need to be addressed during the detailed sediment control/stormwater management plan stage:

a) A detailed review of the stormwater management computations will occur at the time of detailed plan review.
b) An engineered sediment control plan must be submitted for this project.
c) Feasibility of Chapter 3 structural practices may be explored further at time of detailed plan review.
d) Filtering planter box pre-treatment structures must be shown on the plans and labeled.

This list may not be all-inclusive and may change based on available information at the time. The concept approval is based on all stormwater management structures being located outside of the Public Utility Easement, the Public Improvement Easement, and the Public Right of Way unless specifically approved on the concept plan. Any divergence from the information provided to this office; or additional information received during the development process; or a change in an applicable Executive Regulation may constitute grounds to rescind or amend any approval actions taken, and to reevaluate the site for additional or amended stormwater management requirements. If there are subsequent additions or modifications to the development, a separate concept request shall be required.

ENVIRONMENTAL COMMENTS

1. **MCDOT will submit a Final Tree Save Plan to Montgomery Planning for review and approval during the final (100%) design phase of the project.** A final Tree Save Plan must be submitted and approved by Planning Staff prior to clearing, grading, or demolition for each phase of construction. The forest conservation inspector can require mitigation for heavily impacted significant and specimen trees which have died due to construction activities.

Historic Preservation

Planning Staff finds the proposal will not have a direct impact on any historic resources, and a Historic Area Work Permit is not required.

Parkland

Stormwater runoff from Houston Street is eroding the hillside into Bullis Local Park. The proposed project will add impermeable surface to the roadway, potentially worsening the problem. The following comment aims to remediate this stormwater runoff on parkland.

PARKLAND COMMENTS

1. **Remove the existing asphalt apron in the shoulder of Houston Street (Station 206+45 to Station 206+75)** (Figure 14) **and provide stable conveyance of stormwater runoff into the outflow channel on parkland.** The existing apron is diverting stormwater runoff from Houston Street into Bullis Local Park and eroding the hillside down into the park (Figure 15). Replace proposed manhole (MH) 7 on Houston Street with a proposed inlet structure, remove existing asphalt in the shoulder behind EX-ES 1, and provide grass swales in shoulder (on both sides of inlet) that direct stormwater from Houston Street into the new inlet and protected outfall on parkland. Coordinate with Parks Staff regarding the appropriate design.

Figure 14: Location of Stormwater Erosion at Bullis Local Park

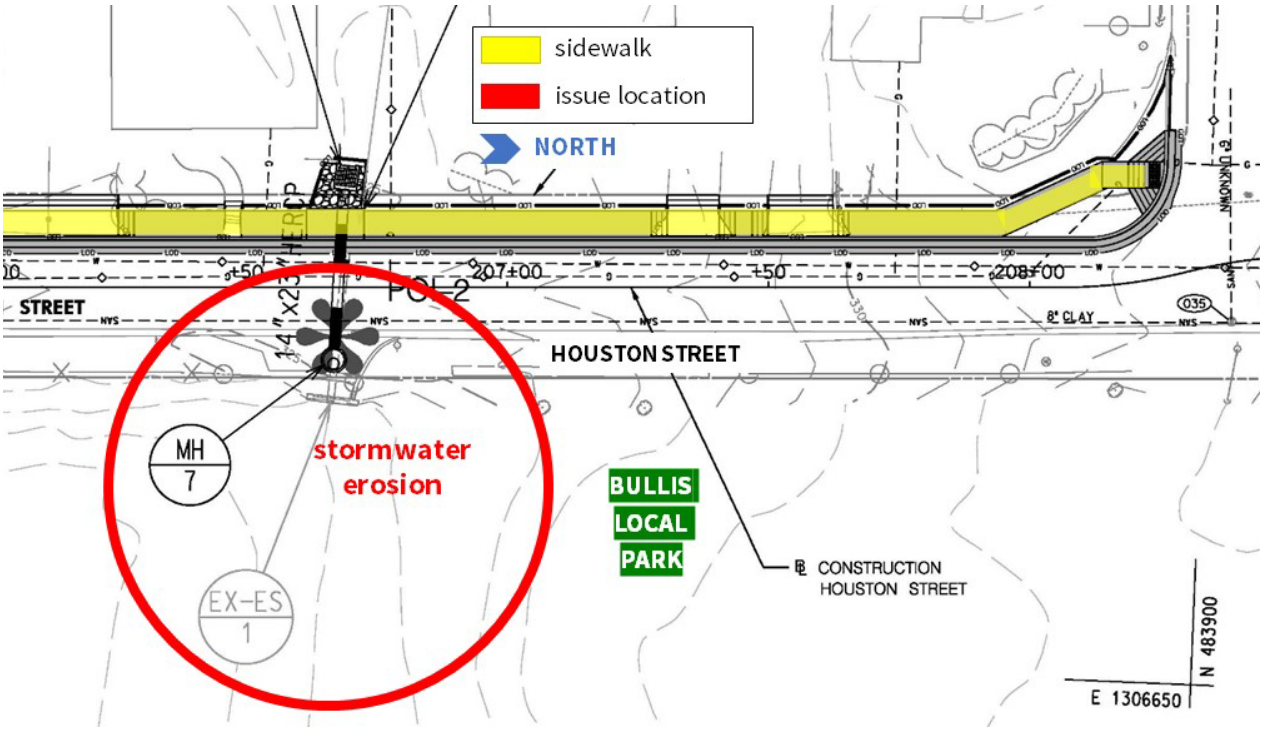

Figure 15: Streetview Image of Existing Asphalt Apron and Erosion at Bullis Local Park

SECTION 5 – COMMUNITY OUTREACH

The Applicant, MCDOT, held public community meetings on May 31, 2023 and November 28, 2023. After Planning Staff accepted the Mandatory Referral for review on June 7, 2024, Planning Staff notified local civic and homeowners' associations and other interested parties of this proposal. As of the date of this report, Planning Staff have received nine comments on this project from the public, which included the following topics. Planning Staff responses are included underneath each comment topic.

1. Recommend that pilot treatments on Grove Street be made permanent.
    - This is the purpose of the proposed project.
2. Recommend that additional traffic calming be constructed at the traffic circle intersection of Woodbury Drive and Gist Avenue. The resident states that vehicles race around the existing Woodbury circle (often the wrong way coming from Fenton) to cut the light at Fenton Street and Silver Spring Avenue.
    - Planning Staff have recommended the inclusion of right-in right-out splitters at all entrances to the traffic circle at Woodbury Drive and Gist Avenue to control traffic speeds and direction.
3. Recommend that traffic calming treatments on Woodbury Drive are not as extensive as Grove Street. The resident enjoys riding on Woodbury Drive with the existing configuration.

- There are large, existing traffic circles on Woodbury Drive, and MCDOT is proposing to construct new traffic circle medians to reduce pavement width at these existing intersections. MCDOT evaluated the appropriate traffic calming treatment for Woodbury Drive, and Planning Staff support the proposed design.

4. Ensure that there is enough space for a school bus to idle in the traffic circle at Woodbury Drive and Violet Place while vehicles can move around it. The resident states that their child's bus waits in this traffic circle for up to 30 minutes.
    - The proposed travel lanes around this traffic circle are twenty-feet-wide in a one-way direction. There should be enough space for a bus to wait in the circle without blocking traffic.
5. Question the need for parallel treatment on Fenton Street.
    - The *Bicycle Master Plan* (2018) recommends two-way separated bike lanes on Fenton Street. This will be a high-quality separated bike facility on a busier road. Having two different types of bicycle facilities on parallel streets ensures redundancy and connectivity within the bicycle network while serving a diverse bicycling population with different levels of comfort and confidence.

A complete record of public correspondence is provided in *Attachment C*.

SECTION 6 – CONCLUSION

Planning Staff recommends transmittal of comments to the Montgomery County Department of Transportation.

SECTION 7 – ATTACHMENTS

Attachment A: Corridor Engineering Drawings

Attachment B: Neighborhood Greenway Overview

Attachment C: Public Comments