
January 15, 2025

Michael J. Workosky, PTP, TOPS, TSOS
Wells + Associates
1420 Spring Hill Rd Ste 610,
Tysons, VA 22102

Dear Mr. Workosky:

Thank you for the opportunity to review the **TIS Submittal #3** prepared and submitted by **Wells + Associates** on January 9, 2025 for the proposed **Democracy Center development (SHA Project No. 24APMO026XX) located on I-270 at Mile point 20.68** in Montgomery County, Maryland.

The Maryland State Highway Administration (SHA) has reviewed the TIS and are pleased to respond.

- The site is located within the North Bethesda Orange Policy Area of Montgomery County. The developer is proposing to build a mid-rise residential housing complex with up to 393 dwelling units on the existing vacant site.
- The site has 2 existing access points that serve the existing office complex, a full access driveway and an additional right-in/right-out access point along Rockledge Drive.
- The developer is proposing to use the existing access points on Rockledge Drive.

Based on the information provided, please address the following comments in a point-by-point response:

Travel Forecasting & Analysis Division (TFAD) Comments (Provided by Scott Holcomb):

1. For the response to TFAD Comment #4, the Intersection #6 signal phasing in the PM Synchro is not addressed as commented. The current AM files have concurrent Phase 4 and Phase 8 with the permitted left turns, matching the signal timing plan, while in the PM files Phase 4 and Phase 8 are still split (separated). That's why SBL delays are 544.6 seconds in the PM scenarios. TFAD recommends changing the PM phasing in the same way as the AM phasing.
2. But as this comment relates to queue challenges on County streets and doesn't appear to immediately impact the Interstate interchanges, we defer them to MCDOT as to the extent that they want them resolved within the LATR or in future design steps.

Michael J. Workosky, PTP, TOPS, TSOS
SHA Tracking No.: 24APMO026XX
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Please contact Mr. Scott Holcomb at sholcomb@mdot.maryland.gov if you have any questions regarding the above comments.

Traffic Development & Support Division (TDSD) Comments (Provided by Chenhao Yuan):

OOTS has reviewed the subject project, and we have no further comments to provide

Please contact Chenhao Yuan at CYuan.consultant@mdot.maryland.gov or Obianuju Ani at Oani@mdot.maryland.gov if you have any questions.

Please provide an Electronic Submission containing the traffic impact study, all supporting documentation, and a point-by-point response addressing the comments noted above to the Access Management Division. For electronic submissions create an account with our online system <https://mdotsha.force.com/accesspermit>. Please reference the SHA tracking number on any future submissions. Please keep in mind that you can view the reviewer and project status via SHA Access Management Division web page at <https://www.roads.maryland.gov/mdotsha/pages/amd.aspx>.

If you have any questions, or require additional information, please contact Mr. Kwesi Woodroffe at 301-513-7347, by using our toll-free number in Maryland only at 1-800-876-4742 (x7347) or via email at kwoodroffe@mdot.maryland.gov or shaamdpermits@mdot.maryland.gov.

Sincerely,

 1/15/2025

for Derek Gunn, P.E.

District Engineer, SHA - District 3

DG/eui

cc: Obianuju Ani, SHA – TDSD
Richard Brockmyer, Montgomery County Planning Department
Peter Campanides, SHA – District 3 Traffic
Rola Daher, SHA – TFAD
Scott Holcomb, SHA – TFAD
Qianyu Hu, SHA – District 3 Traffic
Alvin Powell, SHA – District 3 Traffic
Kwesi Woodroffe, SHA – District 3 Regional Engineer.
Chenhao Yuan, SHA – TDSD
Urooj Zafar, ADE – Project Development, SHA – District 3



DEPARTMENT OF TRANSPORTATION

Marc Elrich
County Executive

Christopher R. Conklin
Director

January 16, 2025

Ms. Amy Lindsey, Planner III
Mid-County Planning Division
The Maryland-National Capital
Park & Planning Commission
2425 Reedie Drive
Wheaton, MD 20902

RE: Preliminary Plan No. 120250020
Democracy Center
Traffic Impact Study Letter

Dear Ms. Lindsey:

This letter replaces the TIS letter dated December 11, 2024. The revised study, dated November 20th, with an addendum dated December 5 and 6, 2024, was prepared by Wells & Associates. Subsequent synchro analysis studies were provided via email on January 9th, 2025, and January 15th, 2025. The Planning Board date is scheduled for January 16th, 2025.

The proposed Democracy Center development proposes to develop a mid-rise residential housing complex with up to 386 dwelling units on a currently vacant property located west of Rockledge Drive and north of Westlake Terrace. The site has two (2) existing access points that serve the existing office complex: a full access driveway at Rockledge Drive with an additional right-in/right-out access point present further south on Rockledge Drive. The Applicant proposes to utilize the existing access points. Access to the building loading dock and residential garage will be provided via a garage access point on the west side of the site.

We offer the following comments:

Synchro Discrepancy:

MDSHA provided a revised letter on January 6, 2025, noting delays/queues forecasted to be extensive at the Rockledge Dr/Rockledge Blvd/Forest Dr intersection EBL (intersection 2), especially during the PM peak period. In addition, MDSHA made comments about the synchro model phasing and timing at various county intersections. To address the comments, the consultant provided a new synchro model and

Office of the Director

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Located one block west of the Rockville Metro Station

response to MDSHA's letter on January 9th, 2025. MCDOT reviewed MDSHA's letter along with the response synchro model and provided comments via email on January 14th, 2025, with a follow-up clarification email on January 15th, 2025. To which the consultant sent a response email on January 15, 2025, stating they had found a discrepancy with the synchro results for the Total Road Diet Scenario in the PM at Intersection 2. In the email, the consultant states that these alterations result in improved queuing results, and the LOS delay is still below the 71-second threshold for all movements.

MCDOT, MDSHA, and Planning staff received the final synchro model on Jan 15th, 2025. MCDOT completed its review on January 16th, 2025.

Adequacy Determination:

1. Per the 2020-2024 Growth and Infrastructure Policy adopted on November 16, 2020 (Council Resolution # 19-655) and the LATR Guidelines dated June 2023, the following adequacy tests are required for the subject site:
 - a. The subject site is in the Orange Policy Area (North Bethesda). In addition, the study (Pg. 4) indicates that the subject development will generate more than 50 total weekday peak hour vehicular trips; therefore, the motor vehicle adequacy test **is required**.
 - b. Since the proposed site is within the Orange Policy Area and will generate between 100 and 199 peak hour person trips, pedestrian, bicycle, and transit adequacy tests **are required** for public facility projects that generate more than 50 peak hour trips.

Motor Vehicle System Adequacy:

1. The subject development is required to conduct the study for the motor vehicle system adequacy per the Local Area Transportation Review (LATR). The LATR test for the North Bethesda policy area requires an analysis of the average delay using the Highway Capacity Manual (HCM). All intersections were found to operate with an HCM below 71 seconds per vehicle, which is considered adequate within the North Bethesda (Orange) Policy Area.

The consultant studied nine (9) intersections during the peak hours (6:30 to 9:30 a.m. and 4:00 to 7:00 p.m.) on Thursday, March 21, 2024, Wednesday, March 21, 2024, Wednesday, May 8, 2024, and Wednesday, May 15, 2024. The results of the total future conditions are summarized in Table 3-5 (Pg. 36). The consultant concluded that the total future conditions for these intersections will not exceed the congestion standard for the North Bethesda policy area. The consultant states that the westbound turns from Site Driveway North onto Rockledge Drive are expected to operate at acceptable levels of service (at LOS "B" or "C") during peak hours. Thus, these movements are expected to be further facilitated by the gaps in the through traffic along the corridor created by the traffic signal at Westlake Terrace, located to the south of the site.

Road Diet Analysis:

1. The Rock Spring Sector Plan recommends a road diet for Rockledge Drive from Westlake Terrace to Rockledge Boulevard, reducing it to three lanes with a center turn lane and bicycle accommodations as shown on Figure 3-7 (Pg. 38). The results of the total future conditions with the road diet capacity analysis are summarized in Table 3-6 (Pg. 39). The analysis indicates study intersections are expected to operate within the applicable congestion standard during both the AM and PM peak hours. Furthermore, all traffic movements, including the eastbound approach from the Site Driveway North onto Rockledge Drive, will continue to operate within acceptable thresholds during both peak periods with the road diet implemented.
2. The Applicant has committed to the implementation of a modified Rockledge Drive road diet section as agreed upon with MCDOT and MCDPS to mitigate the impacts of the development. The extent of the modified road diet is provided on the 10 percent concept design plan and is estimated to cost approximately \$1,665,167.30. Specific improvements to be constructed are to be identified in consultation with Montgomery Planning and MCDOT. The details of design and construction will be included in the certified site plan. Before the release of any above ground building permit, the road diet improvements must be permitted and bonded (to ensure construction) pursuant to MCDOT requirements. All improvements should be completed prior to issuance of the first Use and Occupancy permit.

Queuing Analysis:

1. The findings of the queuing analysis under future conditions with and without the proposed development are shown in Table C under Appendix I. The applicant states queues will be accommodated within available storage, except when the 95th percentile queues are expected to exceed the available storage in the following cases:
 - Rock Spring Drive/Rockledge Drive; eastbound left; PM peak hour: The queue lengths during the PM peak hour for 2028 conditions with development exceed the available storage of 215 feet. The 95th percentile queue length rises to 333 feet, underlining the storage inadequacy. However, in the condition where a road diet is present we note a decrease to 313 feet.
2. The applicant recommends reviewing the traffic signal timings to determine if additional green time can be allocated to reduce the mentioned queues.

Pedestrian System Adequacy:

1. Pedestrian Level of Comfort (PLOC): The applicant has stated that based on the PLOC review, approximately 999 linear feet of off-site pedestrian facilities do not meet PLOC adequacy standards, especially those along the north side of Westlake Terrace. The consultant has outlined the identified deficiencies and improvements required to achieve an adequate PLOC score in

Table 4-1 (Pg. 44). The consultant recommends widening the buffer between the vehicle travel lane and the sidewalk and improving crossings that are not marked or up to standards. Implementing the Rockledge Drive road diet will help reduce stress for pedestrians, cyclists, and other non-motorized users. If the road diet is not implemented, the applicant will need to relocate the existing sidewalk away from the curb. Specific improvements to be constructed are to be identified in consultation with Montgomery Planning and MCDOT. The details of design and construction will be included in the certified site plan. All improvements should be completed prior to issuance of the last Use and Occupancy permit or building permit, whichever comes last.

2. Street Lighting: Based on the review of the streetlight network, all streetlights in the study area are operational, and therefore, no improvements are necessary.
3. ADA Compliance: According to Table 4-3 (Pg. 46), there are off-site curb ramps that do not meet ADA adequacy standards. The applicant has stated that five curb cuts along Rockledge Drive do not include ramps of any kind. As part of the LATR off-site improvements, the applicant should fix Americans with Disabilities Act (ADA) noncompliance issues.

Bicycle System Adequacy:

1. Based on the Bicycle System Adequacy review completed by the consultant, the following was indicated:
 - a. The Level of Traffic Stress (LTS) in the study area is shown on Figure 4-4 (Pg. 56). As shown, Rockledge Drive within the study area is rated with high stress levels since bike facilities are not present along both sides of the road.
2. The consultant states that the Rockledge Drive road diet will improve both sides of Rockledge Drive by adding separate bike lanes with seven-foot wide plantings. These enhancements will significantly reduce the bicycle level of traffic stress. They will also reduce pedestrian level of stress, since the sidewalk will no longer be directly adjacent to the travel lane.
3. The applicant is responsible for showing how the separated bike lanes will transition to the other side of West Lake Terrace.

Transit System Adequacy

1. Based on the Bus Transit System Adequacy review, shown in Figure 4-5 (Pg. 56), there are ten bus stops within the study area. Among these stops, seven have shelters while three do not. Specifically, two are located on the northbound side of Rockledge Drive and one is on the southbound side of Rockledge Drive.
2. Improvements at the bus stops may not be feasible due to lack of right-of-way. Any specific improvements to be constructed are to be identified in consultation with Montgomery Planning and MCDOT. The details of design and construction will be included in the certified site plan. All improvements should be completed prior to issuance of the last Use and Occupancy permit or

building permit, whichever comes last.

Vision Zero

1. An evaluation of vision zero standards included a review of accidents and speed studies. The subject study area does not include any segments identified as High Injury Network segments. We concur with the consultant's findings in the report.
2. The consultant obtained crash data from the Maryland Open Data portal and identified 20 crashes that happened within 900 feet of the site boundary over the last five years. Out of these, 14 crashes were categorized as minor or without any injuries, one crash was considered severe, and none were fatal. There were no reported bicycle or pedestrian crashes.
3. The consultant concluded that the proposed short-term parking along Ardennes Avenue will promote curbside activity, narrowing drivers' perception of the roadway and likely reducing travel speeds. In addition, since the 85th percentile speed on Twinbrook Parkway falls within 120% of the posted speed limit, additional mitigation measures are not necessary.
4. The speed studies conducted along Rockledge Drive revealed that all lanes exceeded 120% of the posted speed limit of 30 mph. This makes them eligible for speed reduction measures. The applicant states the road diet plan would reduce the high speeds by decreasing the through lanes from two to one. Additionally, the average speeds on Westlake Terrace exceeded the posted speed limit of 30 mph in two segments as shown in Table 5-2 (Pg. 64), making them eligible for speed reduction measures. The consultant suggests a possible solution to decrease or narrow the travel lanes to reduce travel speeds.

LATR Proportionality Guide

1. The off-site improvements cost calculation based on the LATR Proportionality Guide is presented on page 58. As shown, the project is required to improve off-site deficiencies approximately \$1,737,062 in costs.

Thank you for the opportunity to review this preliminary plan. If you have any questions or comments regarding this letter, please contact me for this project at brenda.pardo@montgomerycountymd.gov or at (240) 777-7170.

Ms. Amy Lindsey
Preliminary Plan No. 120250020
January 16, 2025
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Sincerely,

Brenda M. Pardo

Brenda M. Pardo, Engineer III
Development Review Team
Office to Transportation Policy

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cc: Correspondence folder FY 2025

cc-e: Mark Terry	MCDOT DTEO
Atiq Panjshiri	MCDPS RWPR
Sam Farhadi	MCDPS RWPR
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