



DEPARTMENT OF TRANSPORTATION

Isiah Leggett  
County Executive

Al R. Roshdieh  
Acting Director

November 18, 2015

Mr. Michael Garcia, Transportation Coordinator  
Area 3 Planning Division  
The Maryland-National Capital  
Park & Planning Commission  
8787 Georgia Avenue  
Silver Spring, Maryland 20910-3760

RE: Provisional APF  
Symmetry at Cloverleaf  
Traffic Impact Study Review

*Mike:*  
Dear Mr. Garcia:

We have completed our review of the Local Area Transportation Review and Transportation Policy Area Review (TIS) dated August 17, 2015, and prepared by Mr. Edward Papazian of Kimley-Horn & Associates, Inc. Total concept development evaluated by the analysis includes:

- 625,000 SF proposed office space
- 125,000 SF retail
- 950 Multi-family residential units
- 150 urban and stacked townhomes

We offer the following comments:

**Local Area Transportation Review (LATR)**

1. Since the turning movement counts are now over a year old, we recommend the applicant be required to submit an updated TIS (with new counts) at the preliminary plan stage.
2. The roadway classifications for each of the streets listed on pages 4 through 6 of the TIS should reflect the designations in Chapter 49 of the County Code and accurately reflect the roadway classifications in the October 2009 Approved and Adopted Germantown Forward Sector Plan. For instance, Crystal Rock Drive is classified as arterial road "A-22" and Kinster Drive is classified as minor arterial "MA-299" – they are not "minor road[s] (neighborhood road or city street)".

Office of the Director

---

101 Monroe Street, 10th Floor • Rockville, Maryland 20850 • 240-777-7170 • 240-777-7178 FAX  
www.montgomerycountymd.gov/dot

3. Page 16 of the report indicates “. . . *It should be noted that the applicant for the Black Hills project included the Century Boulevard extension in their traffic study without being required to participate in this improvement provided by Century. This courtesy was granted by Symmetry. Accordingly, this traffic study includes the improvement to the Father Hurley Boulevard and Crystal Rock Drive intersection, with the understanding that Symmetry will not be required to participate in this improvement.*”

We do not agree with those statements. It should be noted the extension of Century Boulevard was constructed under a joint public/private participation project (“Subdivision Roads Participation”, CIP Project No. 508000). Although the developer of the Symmetry site was significantly involved in constructing that extension, it was not completed at the applicant’s sole expense.

The “Intersection Capacity Analysis Results” table on page 41 of the TIS indicates the Symmetry development will be adding traffic to this intersection. We defer to the Planning Board to determine what, if any, level of participation is needed in this improvement by this applicant.

4. Page 16 of the report indicates “. . . *a condition of approval for the Black Hills development is the restriping of a northbound through lane along Crystal Rock Drive to create a second northbound right-turn lane onto eastbound Father Hurley Boulevard. We have determined that this improvement is not needed as the existing single northbound right-turn lane operates as a free-flow right-turn movement. As a result, on the northbound approach, this study maintains the existing two through lanes and has the single right-turn lane operating as a free-flow right turn movement.*”

Does Planning Department staff agree with that conclusion? It is not consistent with the recommendations in our January 7, 2013 review comments letter for the TIS for the original Black Hills preliminary plan.

5. With the exception of the Crystal Rock Drive and Kinster Drive/Waters Landing Drive intersection, the CLV values at the intersections studied are less than the applicable congestion standards under total improved traffic conditions. However, the proposed improvements at this intersection will reduce the CLV values below the congestion standards. Therefore, we accept the applicant’s conclusions.

The text of the report should clearly describe the improvements that the applicant is proposing to remedy the CLV and HCM conclusions. Figure 3 of the report indicates the construction of additional turn lanes on northbound and southbound Crystal Rock Drive, as well as an additional westbound left turn lane on Kinster Drive. At the preliminary plan stage, we will need the consultant to submit concept plans for the proposed improvements to verify the adequacy of (or need for additional) right-of-way and/or easements to implement the proposed widenings.



We note that, under Total Future Traffic Volume conditions, the PM CLV for the Ridge Road (MD 27)/Father Hurley Boulevard northbound ramp decreases from the calculated Background Traffic volume. Is this figure correct? If so, the report should explain the reason for the decrease.

6. MCDOT will require Traffic Signal Warrant Analyses be submitted at the preliminary plan stage for the intersections of
  - o Century Boulevard/Kinster Drive /main site entrance
  - o Crystal Rock Drive/Kinster Road/Waters Landing Drive

If traffic signal(s) are determined to be warranted, construction of same shall be at the applicant's cost.

#### **Pedestrian and Bicycle Impact Statement (PBIS) and Transit**

1. We recommend that the consultant analyze the pedestrian, bicycle and transit impacts at and near the site access at the Century Boulevard and Kinster Drive intersection.
2. With the exception of bike lanes along Crystal Rock Drive north of Father Hurley Boulevard, the list of existing bicycle and pedestrian facilities on pages 13 and 14 does not identify any existing bicycle amenities. Is that correct? (This conclusion seems inconsistent with the map on page 32 of the Sector Plan.)

#### **Transportation Policy Area Review (TPAR)**

1. The Transportation Policy Area Review test under the Subdivision Staging Policy must be satisfied by paying the "transportation impact tax" that equals 25% of the development impact tax for a site located in the Germantown Town Center and Germantown West Policy Areas.

#### **SUMMARY**

1. We recommend an updated TIS, with new turning movement counts, be submitted at the preliminary plan stage.
2. We recommend this report be updated to correctly reflect the classifications of nearby roadways per the 2009 Germantown Forward Sector Plan.
3. We defer to the Planning Board to determine what, if any, level of participation by this applicant is needed in the construction of the second eastbound left turn storage lane at the intersection of Father Hurley Boulevard and Crystal Rock Drive.

Mr. Michael Garcia  
Symmetry at Cloverleaf  
November 18, 2015  
Page 4

4. The findings of the LATR have been accepted, and we conceptually support approval of the applicant's proposed mitigation for the Crystal Rock Drive and Kinster Drive/Waters Landing Drive intersection. At the preliminary plan stage, we will need the consultant to submit concept plans for the proposed improvements to verify the adequacy of (or need for additional) right-of-way and/or easements at that intersection.
5. Traffic signal warrant analyses will be required at the preliminary plan stage for the intersections of Century Boulevard/Kinster Drive/main site entrance and Crystal Rock Drive/Kinster Drive/Waters Landing Drive.
6. We recommend that the consultant analyze the pedestrian, bicycle and transit impacts at and near the site access (at the Century Boulevard and Kinster Drive intersection) at the preliminary plan stage.
7. The applicant will need to pay a transportation impact tax equal to 25% of the development impact tax.

Thank you for the opportunity to review this report. If you have any questions or comments regarding this letter, please contact Mr. Billy Whelan, our Development Review Engineer for this project, at [william.whelan@montgomerycountymd.gov](mailto:william.whelan@montgomerycountymd.gov) or (240) 777-2173.

Sincerely,



Gregory M. Leck, Manager  
Development Review Team  
Office of Transportation Policy

m:\correspondence\fy16\traffic\active\Symmetry at Cloverleaf APF tis review ltr.docx

cc: Edward Papazian      Kimley-Horn & Associates, Inc.  
Nicole Totah              Symmetry at Cloverleaf, LLC  
Preliminary Plan folder  
Preliminary Plan letters notebook

cc-e: Fred Lees; MCDOT DTEO  
Khursheed Bilgrami; MCDOT DTEO  
Bruce Mangum; MCDOT DTEO  
Mark Terry; MCDOT DTEO  
Billy Whelan; MCDOT DTEO