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January 14, 2021

Ms. Erica Rigby
Acting District Engineer
MDOT SHA, District 3
9300 Kenilworth Avenue
Greenbelt, MD 20770

Attn: Mr. Kwesi Woodroffe

RE: Takoma Junction
MDOT SHA Tracking # 19-AP-MO-008-xx
Our Job No.: 2016-0409

Dear Ms. Rigby:

This letter has been prepared to provide responses to comments received from the Maryland Department of Transportation State Highway Administration (MDOT SHA) (letter dated November 2, 2020), Maryland National Capital Park and Planning Commission (M-NCPPC) (email correspondence dated December 3, 2020 and December 10, 2020), and Montgomery County Department of Transportation (MCDOT) (email correspondence dated December 3, 2020) in reference to the review of the Revised Traffic Impact Analysis for the Takoma Junction site dated September 17, 2020. This letter accompanies the revised report with the changes that have been made in response to the comments discussed below.

MDOT SHA Regional and Intermodal Planning Division (RIPD) Comments
(Prepared by Kandese Holford):

Comment No. 1 – 05/08/2020 Takoma Junction TIS comments. These comments stand and are available upon request.

Response No. 1 – In response to these comments regarding recommendations from the County’s Master Plans for proposed ped/bike/transit facilities in the surrounding area and in accordance with the SHA Vision Study, we have met with representatives from SHA, M-NCPPC, and MCDOT to coordinate and receive input from each of the agencies. It was agreed that the developer will provide bicycle compatibility on Carroll Avenue along the site frontage. The location of bus stops and relocation of bike stations were also agreed to and will be reflected on the plan submittal. The report has also been revised to address the ADA non-compliance issues per the MCDOT Memo dated October 25, 2018.

Comment No. 2 – On page 8, under *Existing Traffic Conditions | Pedestrian Facilities | Proposed Sidewalks along the Frontage of Takoma Junction Project*, more information is needed about the intended use for the proposed 7-foot sidewalk adjacent the truck loading lane, especially when pedestrians are present during truck loading/unloading. In general, more clarification is needed to determine the whether the proposed facilities along the site frontage functions as an acceptable pedestrian realm.

Response No. 2 – The new sidewalk along the site frontage is proposed to be a minimum of 6 feet wide. The revised report provides detailed ADA compliance evaluation results on the surrounding pedestrian network including the proposed sidewalk along the site frontage.

MDOT SHA Travel Forecasting & Analysis Division (TFAD) Comments
(Prepared by Scott Holcomb):

Comment No. 1 – On Page 12, the report indicates that shared facilities for bicycles do not exist on Carroll Avenue between Grant and Philadelphia Avenues. TFAD’s understanding is that there is signage on westbound Carroll Avenue in this area for bikes to be able to use a full lane.

Response No. 1 – The description on existing bicycle facilities has been revised in the report.

Comment No. 2 – In the original TIS report, background site #5 (Elm Avenue Daycare) was included in the background developments, whereas it is removed in this report. The correspondence with MNCPPC in Appendix E still shows the daycare development without updated information. Confirm that this removal has been approved by MNCPPC or MCDOT.

Response No. 2 – MNCPPC has confirmed the exclusion of the Elm Avenue Daycare from the background traffic. Please see MNCPPC’s December 10, 2020, Comment No. 2 below.

Comment No. 3 – TFAD defers to MCDOT and MNCPPC regarding using the 120 seconds of delay/vehicle threshold for this location versus the 80 seconds documented for this area in the LATR guidelines. We do acknowledge that there are high pedestrian and bicycle volumes in the area that make maximizing vehicle capacity at intersections challenging.

Response No. 3 – The report did not use 120 sec/veh as the vehicle delay standard for the motor vehicle adequacy test. We were only trying to describe the characteristics of the transportation related activities in this area which are similar to a CBD but have a much lower standard which is difficult to achieve. The revised report has removed the sentence that suggested the delay standard in the area should be increased. That was not the intent of the statement. Although the study intersections do not meet the delay standard of 80 sec/veh in all cases, the traffic impact of this site can be mitigated with the proposed signal timing modifications.

Comment No. 4 – While not included in detail in the Table 13 queue summary, the queues from Intersections #1 and #2 extend well past the site access point along Carrol Avenue. And the westbound left turn queue at the site access (Intersection #3) shown in the Appendix exceeds the available storage, backing up beyond Intersection #1. If any geometrical improvement is not available for the intersections, consider operating the site access as a right in/out only. This may be safer for traffic using the access and may also assist with reducing the increased queues entering the study area, such as the westbound Ethan Allen queue and the EB Carrol Avenue queue at Philadelphia Avenue in the PM peak.

Response No. 4 – The site access has been changed to a right-in/right-out only in the revised report to prevent potential queuing and blocking issues between the two signalized intersections.

MDOT SHA District 3 Traffic Comments (Prepared by Natasha Aidoo):

Comment No. 1 – The location of the proposed full movement access will adversely affect traffic signal operations at the intersection of MD 195 (Ethan Allen Road) and Philadelphia Road. It is recommended that the access be restricted to right-in/right-out. The proposed left-in and left-out movements at the proposed access should be eliminated to maintain operations at the adjacent signalized intersection.

Response No. 1 – The site access has been modified as right-in/right-out only in the revised TIS to prevent potential queuing and blocking issues between the two signalized intersections.

Comment No. 2 – Traffic related comments regarding the geometric layout of the proposed layby will be provided as part of the plan review phase.

Response No. 2 – So noted.

Comment No. 3 – Please submit Synchro/SimTraffic files with the revised submittal.

Response No. 3 – Synchro files are provided in the Appendix of the revised TIS.

M-NCPPC Department of Planning: Transportation Study Review Comments (Provided by Katie Mencarini, December 3, 2020):

Comment No. 1 – Within the background projects, #5 Elm Avenue Daycare removed and it should be put back.

Response No. 1 – This comment was withdrawn in the December 10 comments below.

Comment No. 2 – Page 11 states that the layby will be 7 ft but the cross section and submitted plans showed 9 ft. Make sure all measurements are consistent across submitted documents.

Response No. 2 – The truck loading layby lane will be 9 feet in width as shown on the submitted plan.

Comment No. 3 – Page 12 references an existing bikeshare station which is proposed to be relocated. Update the TIS with the new location for the existing bikeshare station.

Response No. 3 – The TIS has been revised to show that the existing bikeshare station will be relocated to the Takoma Junction Park in the northeast corner of the intersection of Carroll Avenue and Ethen Allen Avenue.

Comment No. 4 – The ADA adequacy analysis submitted with the TIS is deficient and does not reflect the October 25, 2018 Memo from MCDOT to M-NCPPC. Coordinate with MCDOT as soon as possible to scope the pedestrian adequacy assessment. Planning staff strongly urges the Applicant to include the pedestrian adequacy assessment with the revised TIS. The memo outlining the requirements for Pedestrian adequacy is attached to this email for your reference.

Response No. 4 – MCDOT was consulted and the pedestrian adequacy assessment was scoped and approved based on the October 25, 2018, Memo. The revised TIS provides the updated assessment results.

Comment No. 5 – On page 21 the Report recommends the congestion standard for the studied intersections be increased from 80 seconds to 120. Staff does not agree that the intersection delay standard should be increased to 120. This is further upheld by the Council-adopted Growth and Infrastructure Policy (CIP) which confirmed that the current Silver Spring/Takoma Park Policy area boundaries and congestion standard would not change ([online map](#)).

Response No. 5 – The report did not use 120 sec/veh as the vehicle delay standard for the motor vehicle adequacy test. We were trying to describe the characteristic of the transportation related activities in this area which is similar to a CBD which commonly have a 120 sec/veh standard. The revised report has removed the sentence that people interpreted that we were suggesting the delay standard in the area should be increased. Although the study intersections do not meet the delay standard of 80 sec/veh, the traffic impact of the site can be mitigated with the proposed signal timing modifications.

Comment No. 6 – Page 27

- a. Remove the table showing CLV analysis as this is not required for Orange Policy Areas per the 2017 LATR. Move this to the appendix.

Response No. 6a – The CLV result table was moved to Appendix B before the CLV worksheets.

- b. Clarify how the average vehicle delay for the Total Traffic scenario (126.3 sec/vehicle) is roughly 3 seconds fewer than the Background Traffic scenario (129.5 sec/vehicle) at intersection 1: Ethan Allen Avenue & Carroll Avenue/Sycamore Avenue in the morning peak hour.

Response No. 6b – The lower average delay under total traffic likely resulted from the fact that the site traffic was added to movements with delay less than the average delay, therefore reducing the overall average delay and the fluctuation nature of the simulation results. This situation no longer exists in the revised TIS.

- c. Provide the proposed signal timing adjustment to MCDOT for review to confirm that the mitigation proposed can achieve the average vehicle delay. MCDOT review of the signal timing files will take approximately 2 weeks.

Response No. 6c – The current timing for the two signals was provided by MCDOT in July 2020. The proposed timing change is shown in the table below. No timing change was proposed for the signal at Carroll Avenue & Philadelphia Avenue.

Signal Timing for Intersection of Ethan Allen Ave and Carroll Ave / Sycamore Ave								
AM Peak	Cycle Length	Offset	EB LT	WB	NB	SB	EB	Exclusive Ped
			Carroll Ave	Ethan Allen Ave	Sycamore Ave	Carroll Ave	Carroll Ave	
			Phase 1	Phase 2	Phase 3	Phase 4	Phase 6	Phase 8
AM Peak								
Existing	150	29	26	47	22	23	73	32
Proposed	150	32	29	44	22	23	73	32
PM Peak								
Existing	150	31	40	38	21	22	78	29
Proposed	150	50	38	40	21	22	78	29

M-NCPPC Department of Planning: Transportation Study Review Comments (Provided by Katie Mencarini, December 10, 2020):

Comment No. 1 – Please provide the historical AADT data to support the growth rate (none) to the 2018 traffic counts.

Response No. 1 – The historical AADT data for the last 10 years was provided on the last page of Appendix A. A negative growth rate was found on Philadelphia Road while growth rates of zero and .7% were found on Carroll Avenue and Ethan Allen Avenue, respectfully.

Comment No. 2 – In our previous comments we requested that the CentroNia/Elm Day care be re-entered into the background. We amend that comment with the understanding that this project was not approved and will not be moving forward. Therefore, it should not be included in the background traffic scenario.

Response No. 2 – CentroNia/Elm Daycare has been excluded from the background traffic.

Comment No. 3 – It is our understanding that there is at least one project in the vicinity of the Site but within the District of Columbia that may be approved but unbuilt. Staff is working to get information on this project(s). If there are projects approved in the District with entitlements that are not yet built, these will need to be added to the background of the TIS. **Staff will get this information to you as soon as possible.**

Response No. 3 – The list of the approved developments in DC was provided by the staff and included in the revised TIS.

Comment No. 4 – It appears that the TIS, the SOJ and Site plan propose different densities and uses. Please confirm with the engineers and project lead to determine what is actually being proposed. The TIS can study higher densities than what is included in the SOJ to be conservative, but the study can't include lower densities.

Response No. 4 – The TIS has been revised to show a slightly smaller office space from 18,772 to 18,119 sq ft to match the submitted site plan. The retail and restaurant space remain the same and are consistent with the site plan.

MCDOT (Provided by Katie Mencarini, December 3, 2020):

Comment No. 1 – The revised TIS study dated September 17, 2020 summarized the following:

Intersection	HCM Delay Standard (sec/veh)	Existing Traffic-Delay (sec/veh)	Background Traffic-Delay (sec/veh)	Total Traffic-Delay (sec/veh)	Total Traffic with signal time adjustment-Delay (sec/veh)
Ethan Allen Ave & Carroll Ave (MD-95) / Sycamore Ave	80	116.6	129.5	126.3	116.8
Carroll Ave (MD-195)/ & Philadelphia Ave (MD-410)	80	99.9	108.1	109.5	82.2

The consultant determined that the optimization of traffic signal timings at both intersections [Ethan Allen Avenue & Carroll Avenue (MD-195)/Sycamore Avenue and Carroll Avenue (MD-195) & Philadelphia Avenue (MD-410)] would mitigate the traffic impact of the proposed site. The consultant’s opinion is that the area is more urban and the delay standard to be increased to match the delay standard of Bethesda CBD which is 120 seconds.

We **do not agree** with the applicant’s conclusion/opinion for the following reasons:

- i. The two intersections Ethan Allen Avenue & Carroll Avenue (MD-195)/Sycamore Avenue and Carroll Avenue (MD-195)/ & Philadelphia Avenue (MD-410) are not meeting the delay standard of 80 sec/veh per LATR guidelines.
- ii. Based on the report the optimization of the signal timings at the intersection of Ethan Allen Avenue & Carroll Avenue (MD-195)/Sycamore Avenue would improve the proposed/background traffic conditions to the existing conditions which is above the delay standard of 80 sec/veh. Please provide detailed explanation how this is achieved.
- iii. Based on the optimization of the signal timings at the intersection of Carroll Avenue (MD-195)/ & Philadelphia Avenue (MD-410) would improve the existing, proposed and background traffic conditions to 82.2 sec/veh which is close to meeting the delay standard of 80 sec/veh. Please provide detailed explanation how this is achieved.
- iv. The delay standard to be increased to match the delay standard of Bethesda CBD which is 120 seconds.

Response No. 1 – The report did not use 120 sec/veh as the vehicle delay standard for the motor vehicle adequacy test. We were trying to describe the characteristics of the transportation related activities in this area which is similar to a CBD. The revised report has removed the sentence that suggested the delay standard in the area should be increased. Although the study intersections do not meet the delay standard of 80 sec/veh, the traffic impact of the site can be mitigated with the proposed signal timing modifications shown in the table below.

Signal Timing for Intersection of Ethan Allen Ave and Carroll Ave / Sycamore Ave								
AM Peak	Cycle Length	Offset	EB LT	WB	NB	SB	EB	Exclusive Ped
			Carroll Ave	Ethan Allen Ave	Sycamore Ave	Carroll Ave	Carroll Ave	
			Phase 1	Phase 2	Phase 3	Phase 4	Phase 6	Phase 8
AM Peak								
Existing	150	29	26	47	22	23	73	32
Proposed	150	32	29	44	22	23	73	32
PM Peak								
Existing	150	31	40	38	21	22	78	29
Proposed	150	50	38	40	21	22	78	29

Comment No. 2 – Queuing Analysis: We **strongly recommend** MDSHA to restrict the proposed access to right-in/right-out with channelization for the following reasons:

- a. Safe traffic operations from and to the subject site from Carroll Avenue (MD-195).
- b. Since the queue length along Carroll Avenue (MD-195) is greater than the storage lengths for the turn lanes and exceeds beyond the proposed access point.
- c. Based on the total number of left turning vehicles from the proposed access onto Carroll Avenue (MD-195) and the left turn into the site from Carroll Avenue (MD-195) during the PM peak hour are 33 vehicles per hour (vph) and 37 vph respectively and the queues on Carroll Avenue (MD-195) extends past the proposed access.

If MDSHA agrees on restricting the proposed access to right-in/right-out with channelization then the proposed bus stop location and the layby (if approved by MDSHA) may be impacted. Please revise the plans accordingly.

Response No. 2 – The site access has been modified as right-in/right-out only in the revised TIS to prevent potential queuing and blocking issues between the two signalized intersections. The proposed bus stop location has been adjusted. Layby lane and bike lane have been revised based on a meeting with the respective agencies and are shown on the current plan.

Comment No. 3 – We defer to the MDSHA for final decision regarding state-maintained intersection(s)/roadway(s).

Response No. 3 – So noted.

Comment No. 4 – The LATR states the following should be achieved:

- a. Fix (or fund) all Americans with Disabilities Act (ADA) noncompliance issues, including, but not limited to, curb ramps and sidewalks, within a 500-foot radius of site boundaries or within the distance to the nearest signalized intersections located beyond a 500-foot radius of site boundaries.
- b. The report **does not** address the resolution of the ADA non-compliance issues per the LATR. The report should be revised per the MCDOT Memorandum dated October 25, 2018- “Technical Guidance: 2016 Subdivision Staging Policy (SSP) ADA Noncompliance Test Procedures for urbanized areas”.

Response No. 4 – MCDOT was consulted and the pedestrian adequacy assessment was scoped and approved based on the October 25, 2018, Memo. The revised TIS provides the updated assessment results.

Comment No. 5 – The applicant **did not** provide the presence of existing street lighting in the vicinity of the site as required by the LATR Pedestrian and Bicycle Impact Statement.

Response No. 5 – The TIS was revised to provide the Street Lighting section with descriptions and the map showing the locations of existing street lighting as shown on Exhibit 4.

All of the above responses have been incorporated into the revised report. We believe these responses and the revised report address all of the outstanding issues at this time.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Glenn E. Cook
Senior Vice President

CC: Mr. Kwesi Woodroffe – MDOT SHA
Mr. Kandese Holford – MDOT SHA
Mr. Scott Holcomb – MDOT SHA
Ms. Katie Mencarini – M-NCPPC
Ms. Rebecca Torma – MCDOT, Development Review
Mr. Deepak Somarajan – MCDOT, Development Review
Mr. Elza Hisel-McCoy – M-NCPPC, Area 1 Planning

GEC:amr

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