Martin O'Malley, *Governor*
Anthony G. Brown, *Lt. Governor*

State Highway Administration
Maryland Department of Transportation

Beverley K. Swaim-Staley, *Secretary*
Neil J. Pedersen, *Administrator*

October 22, 2010

Ms. Françoise M. Carrier
Chair
Maryland-National Capital Park and planning Commission
Montgomery County Planning Board
Office of the Chairman
8787 Georgia Avenue
Silver Spring MD 20910

Dear Chair Carrier:

Thank you for your summary comments regarding the Mandatory Referral of the three approved Base Realignment and Closure (BRAC) Intersection Improvement projects: MD 355 (Rockville Pike) and Cedar Lane/West Cedar Lane; MD 355 and Jones Bridge Road/Center Drive; and MD 187 and West Cedar Lane/Oakmont Avenue. The State Highway Administration (SHA) understands the importance of these projects, not only for BRAC in Bethesda, but also for the neighborhoods of the surrounding area. The SHA has reviewed your comments for these three, approved intersection projects, to which we offer the following responses:

1. *Make additional area bicycle and pedestrian improvements needed to provide safe and convenient access to the NIH and NNMC campuses within the overall BRAC traffic impact area rather than the limits of the individual intersection projects within that area.*

   Response: Currently, there is not sufficient funding to complete all phases of the identified SHA projects. If there is a surplus of BRAC funding in the Bethesda area, SHA will work with Montgomery County and the Maryland-National Capital Park and Planning Commission (M-NCPPC) to determine areas outside the intersection improvement project limits that should be considered for improvements to the bicycle and pedestrian facilities.

2. *Revise the proposed handicap ramp designs to meet ADA Best Practices wherever possible, including locating sidewalks and paths behind handicap ramps at intersections to avoid unnecessary grade changes for handicapped persons.*

   Response: The SHA recognizes the importance of implementing the Americans with Disabilities Act (ADA) Best Practices to the maximum extent practicable. The SHA also strives to provide adequate and safe pedestrian and bicycle accommodations, while minimizing impacts to adjacent residential and institutional properties. The SHA has accomplished these best practices where feasible, while still leaving room for drainage structures, utility poles, signal poles, pedestrian push buttons, and all other items with particular placement requirements. A minimum three-foot buffer is proposed along the institutional properties.

3. *Widen proposed sidewalks and shared use paths by two feet where they are located adjacent to the curb.*

   Response: If a sidewalk is located adjacent to the curb, it can be assumed that we need to tie back into existing ground as soon as possible, to avoid security fence lines, additional tree or property impacts, retaining walls and/or a home's front steps. These areas have been minimized throughout the projects.

4. *At intersections where SHA believes that a safe ADA-accessible crossing cannot be provided, we recommend that the intersections be signed to prohibit the crossing and to direct pedestrians to the safest crossing.*

   Response: The SHA standard practice does not require installation of signs that prohibit crossing where crosswalks and ramps are not provided and no waiver is required. If signs are used without restraint, they lose their effectiveness. If there are locations where there is a documented safety concern, please notify SHA so that we can promote pedestrian crossings at the nearest marked crosswalk at a signalized intersection.

5. *Provide supporting documentation of any final decision not to provide crosswalks on all legs of signalized intersections.*

   Response: The SHA did not provide crosswalks at signalized crossing locations where there was an unavoidable conflicting movement with pedestrians, or where, geometrically, installation was not feasible. At MD 355 and Wilson Drive, there is a double left turn from Wilson Drive to northbound MD 355 where there was a crosswalk. The SHA relocated the crosswalk to the south leg of the intersection and removed the north-leg crossing. The same scenario occurs at MD 355 and Jones Bridge Road, where there is a double left from Jones Bridge Road to southbound MD 355. In the detailed intersection section, SHA explains why it is unable to provide a south-leg crossing at MD 355 and Cedar Lane.

6. *Evaluate lighting along the roads covered by these projects for their adherence to current AASHTO lighting standards and upgrade and augment these facilities where needed.*

   Response: Continuous roadway lighting is currently provided within the projects' limits of work. The existing lighting will be maintained or relocated by the utility owner, if the utility pole is to be relocated. The SHA will install the appropriate level of roadway lighting, as needed, at all signalized intersections within the limits of work. If M-NCPPC feels it is necessary to provide more lighting at additional, unsignalized facilities, please make SHA aware. We will study whether lighting is warranted per SHA's design policy for roadway and/or pedestrian lighting.

7. *Continue to coordinate with MCDOT on their Countywide Bus Rapid Transit Study and consider the designation of additional through travel lanes as "diamond lanes" for restricted use by buses and high-occupancy vehicles during peak periods along the State highways covered by these projects.*

   Response: The SHA is meeting with Montgomery County and M-NCPPC for the second time on October 25 to discuss options for Bus Rapid Transit. This study is in the early stages of planning, but SHA will continue its involvement and provide comments and concerns.

8. *Consider providing a four-foot-wide smooth concrete panel as part of the proposed decorative crosswalks to accommodate persons with disabilities.*

   Response: The SHA will not use concrete for crosswalks in this area. The curing time for concrete is too long and will significantly impact traffic operations. However, regardless of the crosswalk treatments SHA decides to use, decorative or not, they will be ADA compatible.

9. *Where large volumes of pedestrians and bikes are expected, consider making the crosswalks wider than ten feet.*

   Response: Depending on the locations, adjustments to widen crosswalks would impact the placement of stop bars and increase the distance between the signal head and stop bars. The SHA feels that ten feet provides adequate width for counter flow for pedestrians and bicyclists.

10. *Provide shade trees between the curb and sidewalk wherever possible. Major deciduous trees are recommended over flowering trees in the ROW to provide a better sense of scale on these wide roads. Utilize species of trees that can accommodate the pruning needed to accommodate overhead utilities.*

    Response: Landscape plant materials (shade trees, flowering trees, and shrubs) will be provided where possible, as long as they do not conflict with existing or proposed site conditions, such as sight distance, roadside safety, pedestrian safety, underground utilities, or signage. Any species planted near or under utility lines will be selected from our list of utility-friendly plant species and will not grow into the overhead lines. Major deciduous trees will only be provided where all of the previously stated concerns can be avoided.

11. *Impervious surfaces in the median should be avoided wherever possible in favor of landscaping. Four-foot-wide medians should be planted with liriope.*

    Response: Where sufficient width exists, median areas will receive appropriate landscaping, such as turf grass, perennials, shrubs, flowering trees, or street trees. Using liriope in the smaller median sections can be accommodated. Some areas will receive a stamped concrete treatment, primarily near the pedestrian cut-throughs in the median. Overall, it is the intention of the designers to have as much planted area as possible.

12. *Landscaping and streetscaping should be provided that ensures community compatibility; reflects the national importance of the National Institutes of Health, the National Naval Medical Center, and the Howard Hughes Medical Institute; and is compatible with the landscaping plans of those institutions.*

    Response: Landscape plant materials will be provided within the project limits where site conditions allow. The SHA has been working diligently with the property owners to ensure it is using species of trees that are native to the area and to property owners' liking. We have requested lists of acceptable species from the Department of Parks and the National Institutes of Health (NIH).

13. *Work with our staff to achieve mutually acceptable revisions to landscaping plans for all four intersections within 60 days or prior to submission of Phase 3 for the MD185/Jones Bridge Road project.*

    Response: The SHA will forward all SHA standard milestone plans (30%, 65%, and 90% complete design) to M-NCPPC for all the projects. If you have site-specific comments and suggestions that you would like to discuss with SHA's landscape architects, please feel free to contact SHA.

14. *Provide responses to all other comments within 60 days.*

    Response: The SHA received your letter on August 23. A response will be provided within 60 days.

MD 187 (Old Georgetown Road) and West Cedar Lane/Oakmont Avenue

1. *Complete the North Bethesda Trail by replacing the existing sidewalk along the east side of MD 187 with an eight-foot-wide minimum shared use path from Charles Street to Alta Vista Road and by extending the proposed path from Center Drive to Lincoln Street.*

    Response: The reconstruction limits of the North Bethesda Trail are controlled by the limits of proposed roadway widening and geometric changes, and logical tie-in locations to existing pedestrian/bicycle facilities. The SHA does not disagree with the need for trail extension in order to build the link south to the southern border of the NIH campus and between Charles Street and Alta Vista Road; however, the additional trail project will depend on the allocated funding available for BRAC. The Montgomery County Department of Public Works has developed a conceptual design for the trail extension along the east side of MD 187, south of the BRAC project, which has been shared with SHA.

2. *Provide shade trees on both sides of the North Bethesda Trail extension along NIH's frontage and provide additional planting materials to enhance this facility. Provide shade trees between the curb and sidewalk/path elsewhere on this project.*

Response: The SHA will provide plant material, where possible, throughout the project limits. When determining the final location and selection of replacement or additional plant material, SHA must consider issues such as sight distance, roadside safety, signs, aerial and underground utilities, and any other potential conflicts. As long as there are no conflicts, and buffer areas are five foot or greater, street trees or flowering trees will be provided. Median areas that are wide enough will receive turf grass, perennials, shrubs, flowering trees, or street trees.

3. *Construct the proposed sidewalk on the west side of MD 187 five feet from the curb, except in the immediate vicinity of the northeast corner of the Walter Johnson House.*

   Response: The majority of the sidewalk is located adjacent to the proposed curb in order to provide adequate space for signing and utility poles immediately behind it while minimizing impacts to property line fences, a substantial number of mature trees, and privately owned walkways.

4. *Reconsider providing a six-foot-wide pedestrian refuge on the south leg of MD 187 at West Cedar Lane/Oakmont Avenue.*

   Response: A 6-foot median cut-through cannot be provided without compromising the width of a southbound through lane and the northbound turn bay and reducing the lane width from 11 to 9 feet. The existing curb line is being held, and the sidewalk is proposed adjacent to the curb to minimize impacts to the Bethesda Fire Department and NIH's landscape planters, signing, and trees on both properties. The four-foot median cut-through on the south leg of the MD 187 intersection with West Cedar Lane/Oakmont Avenue is not intended for pedestrian refuge, because sufficient signal timing is provided for a complete pedestrian crossing.

5. *Provide a design treatment for the proposed sidewalk at the Walter Johnson House that ensures the structural stability of the house and is attractive.*

   Response: The SHA is evaluating feasible solutions to avoid impacts to the historic property. The SHA tried to conduct a soils and foundation analysis on October13, but the property owner would not permit SHA onto the property. The SHA will work through its Office of Real Estate to gain access to the property and will coordinate with the property owner on a mutually-agreeable solution. Ultimately, SHA will ensure the improvement does not adversely impact the historical property.

6. *At the proposed MD 187 median cut-through for the fire station, use the same gray color for the concrete as the rest of the ashlar slate median treatment.*

   Response: The SHA will introduce this suggestion to the Bethesda Fire Department to see if it has any objections. If it does not, SHA will incorporate this into the contract documents.

MD 355 (Rockville Pike) and Cedar Lane/West Cedar Lane

1. *Permit the PM peak operation of the proposed half-signal at North Wood Road only if there are no significant additional delays to MD 355 traffic.*

   Response: Currently, SHA is waiting for an access permit proposal package from the Navy, which will include the interim PM peak signal. The SHA anticipates the Navy will propose a triple right out of North Wood Road for the PM peak conditions, in the interim condition. The SHA has determined the installation of a new PM signal will result in significant additional delays; however, until SHA's improvements are constructed, we are considering the interim PM signal pending the Navy's Traffic Impact Statement. We are trying to balance the MD 355 mainline needs and the Navy's ability to get vehicles off the campus.

2. *Provide a crosswalk on the south leg of MD 355 at Cedar Lane/West Cedar Lane or provide a pedestrian-actuated signal to stop traffic in both directions at the proposed half-signal at North Wood Road. The bus stops on either side of MD 355 at North Wood Road should be eliminated if no safe crossing is provided.*

   Response: The SHA reviewed a south leg crosswalk. This is not possible, because it would compromise the maximum allowable distance of 150 feet between the stop bar and the signal head. With the half signal at North Wood Road, SHA is not stopping the heavy southbound movement because of the additional delay it would add to the MD 355 corridor. Although ideal to strive for, a pedestrian crossing cannot, and should not, be provided at every bus stop, especially when a crossing is available within a reasonable distance to the north and south of the bus stop.

3. *Offset the proposed shared use path in the northeast and southwest quadrants of the MD 355/Cedar Lane/West Cedar Lane intersection, as well as the sidewalk in the southeast quadrant, so that they are outside the handicap ramp area. Provide a direct sidewalk connection between the sidewalks in the northwest quadrant so that the users do not have to traverse ramps to travel around the corner.*

   Response: Locating sidewalk behind the ramp at the northeast corner of the MD 355/Cedar Lane intersection would cause adverse impact to the grading of the stormwater management facility. Sidewalk at this location would also reduce the capacity needed to store runoff from the additional impervious surface being added by the project's new pavement, widened pathways and sidewalks, and reconstructed entrance. Reduction of the pond size is not possible for this project, because this is the only site that is available. The northwest quadrant has been revised to provide an eight foot path that connects to the eight foot by five foot ramp landings, giving more area for pedestrians and bicyclists while avoiding additional impacts to the existing parking lot at the Boy Scouts of America. This revision to SHA's design is reflected in the June 21 layout provided to your office.

At the southwest and southeast quadrants, the sidewalk design has been studied, and the shared use path and sidewalk cannot be pulled further away from pedestrian ramps. By offsetting the sidewalk from the existing curb on the southwest corner of MD 355 and West Cedar Lane, there would be impacts to the tree line including two 12 inch and one 24 inch pine trees and drainage structures. At the southeast corner, the proposed sidewalk is offset three feet from the roadway. Any additional offset will limit Stone Ridge School's ability to plant and provide a sign structure.

4. *Provide a continuous ten-foot-wide shared use path along the west side of MD 355 between the West Cedar Lane and Jones Bridge Road intersections.*

   Response: The purpose of this project is to improve these intersections' capacity for the additional BRAC traffic and to upgrade pedestrian and bicyclist facilities along MD 355 within the limits of work. The 950-foot span between the limits of work for the MD 355 at Jones Bridge Road and the MD 355 at Cedar Lane intersection improvement projects currently provides an eight-foot-wide shared use path to accommodate pedestrians and bicyclists. The SHA projects will connect with the existing shared use path to provide a continuous facility. According to SHA's tracking system for ADA compliance, this path is ADA compatible. The ramps at the northwest corner of MD 355 at South Drive and the southwest corner of MD 355 at Wilson Drive are not ADA compliant and will be upgraded with the intersection improvement projects.

5. *Widen the landscape buffer adjacent to the proposed shared use path to eight to eleven feet along the west side of MD 355 between Wilson Drive and the NIH Commercial Vehicle Inspection Facility. This can be accomplished by using a 4:1 slope between the path and curb without increasing impacts on NIH property.*

   Response: The SHA will reconstruct the shared use path, to maximize the buffer between the Commercial Vehicle Inspection Facility (CVIF) structure and the path, while also maintaining a five-foot buffer between the roadway and path. A greater offset to the path would move pedestrian and bicycle traffic closer to the NIH's CVIF. The NIH and its Community Liaison Committee support obstructing the view of the CVIF to the maximum practical extent and keeping the general public as far from the CVIF as possible.

6. *Develop a landscaping plan in conjunction with NIH and NNMC staff that includes provision of shade trees between the shared use path/sidewalk and curb along both sides of MD 355 between the West Cedar Lane and Jones Bridge Road intersections.*

   Response: Where possible, SHA will provide plant material throughout the project limits. When determining the final location and selection of replacement or additional plant material, SHA needs to consider issues such as sight distance, roadside safety, signs, aerial and underground utilities, and any other potential conflicts. As long as there are no conflicts and buffer areas are five foot or greater, street trees or flowering trees will be provided. The median areas that are wide enough will receive turf grass, perennials, shrubs, flowering trees, or street trees.

7. *Provide a replacement for the monumental entrance to the Stone Ridge School that is acceptable to the school.*

   Response: Since the 65 percent plan submittal, a school sign location has been discussed, and we anticipate locating on the southeast corner of MD 355 and Cedar Lane. The SHA still needs to work through how the right-of-way will be acquired, since SHA needs to own a structure behind this grassed area. On the 90 percent plan submittal, SHA will show the location of a monumental stone wall and any other school amenities that are to be "built by others." The SHA is working closely with the Stone Ridge School. The school would prefer to have control over who rebuilds its amenities.

8. *Provide mitigation for the impacts to the park property in the northeast quadrant of the MD 355/Cedar Lane intersections as follows:*

   a. *Design and construct the proposed stormwater facility as a well-landscaped amenity.*

   Response: The SHA will work with the Department of Parks to ensure the stormwater management (SWM) facility fits in as an amenity of the park. Because this facility will need to be excavated and its slopes stabilized, SHA will be able to landscape it. At the 90 percent plan submittal stage, the landscape plan will be refined. The SHA will specify the species and increase the plantings within the grading of the SWM facility. The SHA is awaiting an approved list of preferred plants from your forest ecologist before it alters its design.

   b. *Remove non-native invasive plants from the forested area downstream of the proposed pond site to improve the health and appearance of the streamside forest.*

   Response: The SHA will remove non-native invasive plants within the limits of work. The SHA will coordinate a site visit with the Department of Parks to develop a desirable species list and a list of invasive species to be removed. Trees species to remain and tree species to be removed would be outlined in SHA's special provisions, which will be reviewed by the Department of Parks.

   c. *Relocate the sanitary sewer line as close to the pond site as feasible to minimize the loss of quality forest.*

   Response: With the conceptual level of the sanitary sewer line design, SHA is tying back in perpendicular to Elmhirst Parkway, within the limits of the Stormwater Management Facility's grading, to minimize park impacts.

   d. *Reconstruct the shared use path along Cedar Lane from MD 355 to Elmhirst Parkway to be offset from the roadway by a five-foot-wide (min.) landscape panel with street trees, outside the immediate area of the culvert under Cedar Lane, where possible while minimizing stream impacts. Where this cannot be accomplished, reconstruct the path to ten feet wide where adjacent to the curb and twelve feet wide where adjacent to both the curb and the culvert parapet.*

Response: The SHA will upgrade the shared use path along the north side of Cedar Lane as part of the Park Property mitigation package. The SHA met with the M-NCPPC on September 2 to review the conceptual alignment for the path. The SHA laid out a path that provided the best width and offset possible without causing additional impacts, since the purpose of widening Cedar Lane to the south was to minimize stream impacts. At the west end, to avoid reconstructing the headwall, the widest trail that could be provided would be seven feet plus the two foot shy distance to the headwall with the trail adjacent to the curb. Therefore, the path width starts at seven feet without a buffer and progresses to 10 feet with more than a five-foot buffer from the roadway as you move eastward.

e. *Obtain a signed Memorandum of Understanding from the Montgomery County Department of Parks prior to commencement of any construction related activities on parkland.*

Response: If there is no other reasonable way to negotiate right-of-way and project commitments, SHA will acquire a signed Memorandum of Understanding (MOU) from the Department of Parks prior to any construction-related activities.

f. *Design and construct a hiker-biker trail bridge over Sligo Creek just downstream of Piney Branch Road by June 30, 2012.*

Response: The Department of Parks is determining a feasible bridge alignment across Sligo Creek with the existing topography. The SHA will use this information to scope out the design and construction costs to complete the work. The Department of Parks will provide SHA additional details of existing hiker-biker trail structural facilities. The SHA does not currently have construction funding for the intersection; therefore, it will not commit to a construction start date. The SHA will include language in the MOU documenting the mitigation package pledged to M-NCPPC to tie it formally to the MD 355 and Cedar Lane intersection improvement.

MD 355 (Rockville Pike) and Jones Bridge Road/Center Drive

1. *Provide a crosswalk on the north leg of MD 355 at Jones Bridge Road.*

Response: The current plans do not provide a crosswalk on the north leg of MD 355 at Jones Bridge Road/Center Drive, since it would reduce storage for the heavy left-turn movement from southbound MD 355 to eastbound Jones Bridge Road. It is agreed that a crosswalk on the north leg of the intersection would be more convenient access for pedestrians and off-road bicyclists on the Jones Bridge Road shared use path who are traveling to the Center Drive NIH gate or continuing north on the path on the west side of MD 355. It was determined that both the north and south leg crossings pose multiple issues, and this area would be reevaluated to determine the exact crossing locations.

2. *Offset the proposed shared use path in the northwest quadrant of the MD 355/Center Drive intersection so that it is outside the handicap ramp area.*

   Response: The sidewalk design will be studied and will provide the maximum feasible distance from the pedestrian ramp. However, SHA will avoid impacts to a wall and the security fence in front of the NNMC.

3. *Provide shade trees between the shared use path/sidewalk and curb along both sides of MD 355.*

   Response: Landscape plant materials (shade trees, flowering trees, and shrubs) will be provided where possible, as long as they do not conflict with existing or proposed site conditions, such as sight distance, pedestrian safety roadside safety, overhead and underground utilities, or signage.

4. *Continue to coordinate with MCDOT on the MD 355 Crossing Study and any resulting project. If large-scale utility relocation is required for a subsequent project, particularly if the NNMC fence is to be moved, we recommend that the undergrounding of utilities be considered. If the utilities are not undergrounded, the poles should be moved back to provide an eight-foot-wide landscape buffer between the curb and sidewalk.*

   Response: The SHA will continue coordination with MCDOT to minimize the reconstruction on the MD 355 project. The SHA will ensure that utilities, landscaping, and traffic equipment are placed at their ultimate locations. The project is intended to provide a three foot or wider buffer, where feasible. The provision and width of a buffer depends on numerous factors, such as meeting ADA guidelines; utility relocations; and impacts to, or requests from, adjacent property owners.

5. *Offset the sidewalk on the traffic island at Glenbrook Parkway at MD 355 as well as the ramps on either side of the island by about 12-15 feet from the curb to improve pedestrian safety.*

   Response: The sidewalk will be laid out at a minimum of five feet. A buffer area for this sidewalk cannot be provided, because additional right-of-way would be required and because adjacent utility poles, ornamental trees, landscaping areas, signal pole, and signs would be impacted. However, the sidewalk on the east side of MD 355, from the southern project limit to Jones Bridge Road, will be reconstructed, where possible, to provide an additional two feet, per ADA best practices.

Thank you again for your letter. If we may be of further assistance, please do not hesitate to contact me or Ms. Christina Minkler, Project Manager, Highway Design Division, SHA at 410-545-8050, toll-free 1-888-228-5003 or via email at cminkler@sha.state.md.us.

Sincerely,

Neil J. Pedersen
Administrator

cc: Ms. Christina Minkler, Project Manager, Highway Design Division, SHA
Mr. Brian Young, District Engineer, SHA

bcc: Mr. Mike Haley, Planning and Capital Programming, Maryland Department of of Transportation (MDOT)
Mr. Keith Kucharek, BRAC Coordinator, Regional and Intermodal Planning Division, SHA
Mr. Eric E. Marabello, Chief, Highway Design Division, SHA
Mr. Sean Massey, BRAC Coordinator, MDOT
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