April 1, 2014

Melinda Peters, Administrator
Maryland State Highway Administration
707 North Calvert Street
Baltimore, Maryland 21202

RE: Mandatory Referral for the Purple Line

Dear Ms. Peters,

The Montgomery County Planning Board/Parks Commission reviewed the Purple Line Mandatory Referral at our regularly scheduled meeting on March 20, 2014 and approved it with comments to your agency (see Attachment 1), the Maryland Transit Administration (MTA), the Maryland Department of Transportation (MDOT), and the Montgomery County Department of Transportation (MCDOT). While a specific set of comments is being sent to each agency based on which part of the project is in within its authority, we have also requested that the Secretary of the Maryland Department of Transportation coordinate a joint response by MTA and SHA. A copy of that letter is attached, with the Planning Board/Parks Commission’s full set of comments (see Attachment 2).

One of the major areas of concern regarding the Purple Line project is that pedestrian accommodation around many stations areas is inadequate and can be improved to achieve more ridership and safer conditions. The stations of greatest concern that need State road improvements are Woodside Station, located on MD 390 (16th Street), and Piney Branch Road Station, located on MD 193 (University Boulevard).

The introduction of a rail station and the land use changes recommended by approved and adopted master plans will fundamentally change the nature of many of the Purple Line station areas from one largely focused on automobiles to one equally focused on pedestrians. Yet pedestrian improvements are needed at these station areas. For example:

- MTA is appropriately proposing a marked crosswalk on MD 390 to provide access to the Woodside Station. However, the crossing as planned is unsafe because pedestrians would be directed to cross MD 390, a six-lane highway with a posted speed limit of 35
mph and an AADT of over 25,000 vehicles, without the protection of a traffic signal. **Please provide a signal at this location.**

- The intersection of MD 390 and Spring Street includes an excessive crossing distance on the east leg, requiring two pedestrian signals and three refuge islands to break up the crossing. The intersection geometry also enables vehicles traveling northbound on 16th Street and turning right onto Spring Street to speed across one of the crosswalks. MTA is planning to acquire the Spring Center to the northeast of the intersection and reconstruct the Spring Street bridge over the tracks, so there is an opportunity to make major improvements for pedestrians in an area that connects the Silver Spring CBD with the Woodside Station. With the coming of the Woodside Station, the redevelopment of the Spring Center site after construction of the Purple Line, the completion of the Fenwick Place development at the southwest corner of Spring Street and Second Avenue, an approved redevelopment of the north Falklands parcel, and the potential redevelopment of the southeast corner of the 16th Street/Spring Street intersection, this pedestrian crossing will become far busier than it is currently. **Please provide improvements per the attached recommendations.**

- The proposed Piney Branch Road Station is one of only two Purple Line stations along the entire 16 mile alignment that have a single-ended platform. Station access is from the north side of the platform, so passengers coming from the south have to walk out of their way to get to the station. The longer travel time would decrease the station’s catchment area and therefore its ridership. The Long Branch Sector Plan recommends a traffic signal at the intersection of MD 193 (University Boulevard) and Gilbert Street to not only improve station access, but also to facilitate a connection between the Sligo Creek Trail and the Long Branch Trail to the Northwest Branch Trail. **Please provide improvements per the attached recommendations.**

One additional area where we request assistance from SHA is Long Branch Local Park. The Purple Line will restrict access (left turns in and out) to the community center and pool facilities along MD 320 (Piney Branch Road). MTA has committed to constructing a new driveway for the park to connect to the Barron Street signal, which will allow for left turns out of the park, but left turns in remain a problem. We request that SHA work with M-NCPPC, Montgomery County Department of Parks and Montgomery County DOT to find a way to allow left turns into the park directly from Piney Branch Road, particularly during large community events and swim meets at the park; this would eliminate the need to make circuitous detours on County streets through the neighborhood.
Thank you for your assistance in coordinating a joint response with MTA via MDOT. As noted in the letter to the Secretary, we request that responses to the individual Planning Board/Parks Commission recommendations be provided to us within 45 days. If you have any questions or comments concerning our review, please do not hesitate to call me at 301-495-4605, or you may call David Anspacher of our staff at 301-495-2191.

Sincerely,

Françoise M. Carrier
Chair

Attachments
Attachment 1: Planning Board Comments to SHA
Attachment 2: Letter to MDOT

Cc:
Jeffrey Folden
Sean Johnson
General Comments

Pedestrian access to the Purple Line stations in Montgomery County is inadequate overall, especially at the Lyttonsville, Woodside, and Piney Branch Road stations. In many locations sidewalks or paths are directly adjacent to the curb with minimum width sidewalks. Since pedestrian volumes around Purple Line stations will increase substantially once the Purple Line is operational, SHA should work with MTA and MCDOT to:

- **Commit to providing quality pedestrian and bicycle improvements between stations and the communities in their immediate vicinities.**
- **Conduct a thorough review of this project with the goal of meeting both AASHTO recommendations for pedestrian facilities as well as ADA Best Practices, at a minimum.**
- **Identify near term and long term improvements to enhance station access.**

In addition, legal crosswalks exist at all intersections of two public roads per State law, and all crosswalks must be made fully ADA-compatible per federal law. Therefore:

- **All intersections must be made fully ADA-compatible. At intersections where a safe crossing cannot be provided, signs prohibiting the crossing to all pedestrians should be installed, but SHA must ensure that there are adequate crossing opportunities, particularly in the vicinity of all bus stops.**

**Woodside Station Area**

The Woodside Station is located on the east side of 16th Street (MD 390), just across the street from two multifamily complexes that contain over 1,200 dwelling units. The Purple Line 30% design plans direct residences to cross 16th Street at an unsignalized crosswalk at the existing entrance to the Spring Center, connecting to proposed sidewalks on the west side of 16th Street and a ramp that leads down to the residences. While we support the proposed crossing at this location, the crossing as planned is unsafe because the road is six lanes wide, has a posted speed limit of 35 mph, is used by over 25,000 vehicles on a typical weekday, and SHA has not yet agreed to provide a traffic signal.

For those pedestrians who will be uncomfortable crossing 16th Street under these conditions, the nearest signalized crossing of 16th Street is 800 feet to the south at Spring Street. This will require a deviation of as much as 7 minutes, which is substantial given that the average person will walk as much as 10 minutes to a rail station. Few passengers will go out of their way to cross at this signalized intersection. Most will either cross 16th Street at this dangerous location or will be deterred from using the Purple Line altogether.

Additionally, the location where pedestrians are directed to cross 16th Street is proposed to have a “Maryland T” intersection, a design that does not accommodate pedestrian access.

Therefore, SHA should:

- **Ensure safe pedestrian access from the west side of 16th Street to the Woodside Station by: 1) replacing the “Maryland T” intersection at the existing Spring Center with a normal tee intersection that does not have the splitter island in the median; 2) providing a pedestrian refuge on the south leg of the new tee intersection; and 3) providing a pedestrian-actuated traffic signal at the new intersection.**
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As currently designed, the intersection of 16th Street and Spring Street does not adequately prioritize pedestrians and bicyclists. The crossing distance on the east leg of the intersection is excessive, requiring two pedestrian signals and three refuge islands to break up the crossing. Furthermore, the intersection geometry enables vehicles traveling northbound on 16th Street and turning right onto Spring Street to speed through the intersection. While this may be an appropriate intersection design in areas with limited pedestrian activity, it is inappropriate in an urban area adjacent to both the Silver Spring Central Business District and a planned Purple Line station, where pedestrian activity will be substantial. Since SHA is responsible for the roads that form this intersection, SHA should coordinate with MCDOT and MTA to redesign this intersection to adequately prioritize pedestrians by:

- Eliminating the free right turns and realigning Spring Street and the Spring Street Bridge to form a tee intersection with 16th Street, as part of the reconstruction of the Spring Street Bridge.
- Providing a minimum 6-foot-wide median pedestrian refuge on the north leg of the intersection of 16th Street and Spring Street.

Bonifant Street

The following issues should be addressed in coordination with the Montgomery County Department of Transportation to ensure adequate pedestrian access to the east of the Silver Spring Transit Center:

- The sidewalk bump out at the northeast corner of Georgia Avenue and Bonifant Street will be eliminated, narrowing the sidewalk to about three feet at the Quarry House entrance. Ensure that this sidewalk meets the ADA minimum (i.e. it has a clear width of at least 3 feet).
- The sidewalk bump out at the southeast corner of Georgia Avenue and Bonifant Street would be eliminated, but this elimination appears unnecessary. The bump out should be retained to shorten the pedestrian crossing distance on the east leg of the intersection.

Piney Branch Road

The Purple Line Functional Plan (page 37) recommends implementing sidewalks that are at least 6 feet wide on Piney Branch Road as part of the Purple Line project, and the Long Branch Sector Plan recommends implementing a combined sidewalk and buffer area that is 15 feet wide as part of redevelopment. MTA is proposing to provide only 5-foot sidewalks, with no buffers from the road, and is reluctant to acquire additional right-of-way to widen the sidewalks. Five-foot-wide sidewalks adjacent to the curb are unacceptable in a station area, failing to meet not only the above master plan recommendations, but also AASHTO recommendations, ADA Best Practices, and even SHA’s own guidelines. SHA should make use of opportunities for improving the sidewalks where there is publicly owned land, such as the Long Branch Community Center, the Miles Glass property, Long Branch Local Park, and Long Branch Stream Valley Park. In addition, while the sidewalks as proposed are close to existing buildings, there appears to be additional space where the sidewalks could be widened, though this would require property acquisition. SHA and MTA should work together to:

- Construct the sidewalks on Piney Branch Road to be a minimum of 6 feet wide with a three-foot-wide landscaped offset or ten feet where adjacent to the curb, but evaluate where the sidewalks can be further widened.
- Along the frontage of publicly owned property, construct the sidewalks to be 15-feet wide per the Long Branch Sector Plan Design Guidelines.

The sidewalks on Piney Branch Road to the west of Arliss Street are obstructed with street lights, bus shelters, and utility poles. The proposed five-foot-wide sidewalks that are immediately adjacent to the
curb in the Long Branch commercial area are inadequate. AASHTO recommends ten-foot sidewalks along arterials in business districts where the sidewalk is adjacent to the curb. The large parking lot on the north side of the road appears to have wide drive aisles that could be reduced in width to achieve additional space for sidewalks. SHA should coordinate with MTA to:

ți Increase the width of the sidewalks on the north side of Piney Branch Road, between the Flower Theater and Arliss Street, to 10 feet by reconfiguring the parking lot.

The crosswalks crossing Piney Branch Road where it intersects Barron Street are skewed due to the location of existing driveways. However, the Montgomery County Department of Parks plans to demolish the Miles Glass building and the Purple Line project plans to relocate the driveway to the Long Branch Community Center. Therefore:

ți If the driveway to the Long Branch Community Center at the intersection of Piney Branch Road and Barron Street is realigned either before or during the construction of the Purple Line (either by MTA or another entity), the driveway design should locate the crosswalks on the east and west leg of the intersection at 90 degree angles from Piney Branch Road to reduce the pedestrian crossing distance.

Piney Branch Road Station Area

The 30% plans for the Purple Line do not include a direct connection to the south end of the Piney Branch Road station platform, even though this connection is recommended in the Long Branch Sector Plan. Without this access point, passengers will be required to walk about two minutes out of their way to access the platform. Since the average rail passenger will walk 10 minutes to a station, a 2 minute additional walk will decrease the catchment area of the station.

According to MTA, the access point is not included in the 30% plans because SHA has not agreed to provide a traffic signal at this location. SHA is concerned that left turning traffic from University Boulevard to Piney Branch Road will back up beyond a signal at Gilbert Street. However, the introduction of a rail station in University Boulevard and the land use changes proposed by the Long Branch Sector Plan will fundamentally change the nature of the area from one largely focused on automobiles to one equally focused on pedestrians. A traffic signal at the intersection of University Boulevard and Gilbert Street should be considered for several reasons:

• Improved station access: The proposed Piney Branch Road station is one of only two Purple Line stations along the entire 16 mile alignment that have a single-ended platform. Providing a traffic signal at Gilbert Street would permit access to the station from the south side, reducing travel time by about 2 minutes for riders traveling to and from points to the south of the station and would reduce the number of pedestrian conflicts at Piney Branch Road, potentially improving its operation.

• Safety: A new signal would promote slower vehicular speeds from all directions of travel in the immediate vicinity of the intersection. This is particularly important because of the significant volumes of pedestrians that are expected to cross University Boulevard. The lower traffic volumes at this tee intersection make it a safer place for pedestrians to cross if a signal is installed.

• Enhanced bikeway network: The traffic signal is also an important component of an off-road bikeway that is proposed to connect the Sligo Creek Trail and the Long Branch Trail to the
Northwest Branch Trail. From west to east the shared use path would travel along Domer Avenue, Barron Street, Gilbert Street, and Piney Branch Road.

- **Context:** The Long Branch area today has considerable pedestrian activity. With the additional pedestrian activity generated by the Piney Branch Road Purple Line Station and the density proposed in the Long Branch Sector Plan, University Boulevard will be transformed into a more urban area. MTA’s plans to convert two existing traffic lanes to a transitway shows a significant advancement in balancing the needs of all roadway users, and this approach can also be applied to signalized intersection spacing in urban environments. The spacing between Piney Branch Road and Gilbert Street is about 425 feet, similar to many other examples within a short distance from Gilbert Street and other areas in Montgomery County where the focus is more on providing adequate pedestrian access, local circulation, and access to businesses than it is on higher speed through-travel. Examples include:

**MD 193 (University Boulevard)**
- Carroll Avenue to Merrimac Drive (planned): 500 feet
- Merrimac Drive (planned) to Lebanon Street (planned): 600 feet
- Lebanon St (planned) to Shopping Center driveway (planned): 200 feet
- Shopping Center driveway (planned) to Takoma / Langley Transit Center driveway: 225 feet
- Takoma / Langley Transit Center driveway to New Hampshire Avenue: 400 feet

**MD 320 (Piney Branch Road)**
- University Boulevard to Barron St: 475 feet
- Barron St to Garland St: 375 feet

SHA should:

- Provide a traffic signal at the intersection of University Boulevard and Gilbert Street.

**University Boulevard**

Per its policy, SHA is requiring that the Purple Line project include bike lanes on University Boulevard, however bike lanes do not provide enough protection to attract cyclists with a wide range of abilities on a busy state highway with a posted speed limit of 40 mph. Buffered bike lanes and cycle tracks are widely regarded as superior facilities to bike lanes in this environment. At a minimum, SHA should require MTA to provide a striped buffer between the bike lanes and traffic (buffered bike lanes), though a physical separation from traffic is preferable (cycle tracks).

We understand that SHA is reconsidering its policy on bicycle lanes, as evidenced by the Maryland Twenty-Year Pedestrian and Bicycle Plan finalized in January 2014. An objective of the plan (page 32) is to “Encourage the use of existing processes to implement pilot projects on State roadways to test innovative design treatments such as cycle tracks, colored bike lanes, and new pedestrian crossing treatments, following a context sensitive design approach.” The Purple Line project provides a rare opportunity to prioritize bicycling on a major urban thoroughfare. While bike lanes are an improvement over existing conditions, a treatment with greater protection for cyclists is needed in this area. SHA should consider conducting a pilot project on University Boulevard as part of the Purple Line to implement cycle tracks or buffered bike lanes where there is sufficient right-of-way. Therefore, SHA should work with MTA to:
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Construct cycle tracks or buffered bike lanes on University Boulevard where right-of-way is available, and transition from the cycle tracks or buffered bike lanes to regular bicycle lanes where the right-of-way is constrained.

If the state is not willing to construct cycle tracks or buffered bike lanes as part of the Purple Line, then the typical section should include the off-road shared use path per the Long Branch Sector Plan and Takoma/Langley Crossroads Sector Plan. Therefore, SHA should work with MTA to:

If there is not agreement to construct cycle tracks (or buffered bike lanes) in place of standard on-road bike lanes, provide 8-foot-shared use paths along both sides of University Boulevard where right-of-way is available. Where sufficient space is not available, the shared use path should transition into a sidewalk.

The right turn lanes in the northwest and southeast quadrants of the intersection of University Boulevard and Carroll Avenue are extremely wide and almost the same width as the adjacent three through lanes. Therefore:

The right turn lanes in the northwest and southeast quadrants of the intersection of University Boulevard and Carroll Avenue should be designed to be more perpendicular to University Boulevard. This will reduce the need for the wide lanes, slow down turning traffic, and make it easier for pedestrians to cross.

Takoma Langley Transit Center Station Area

The intersection of University Boulevard and New Hampshire Avenue should be designed to prioritize pedestrian safety and minimize their exposure. The proposed curb radii of between 65 feet and 100 feet at three of the four corners are far in excess of what is needed to accommodate the design vehicle. Therefore:

At the intersection of University Boulevard and New Hampshire Avenue, the radii should be reduced to encourage slower turning speeds, shorten the crossing distance, and enable the handicap ramps to be in better alignment with the crosswalks.

AASHTO recommends that a pedestrian refuge be provided at all intersections that exceed 60 feet. The crossing distance of about 150 feet on the east leg of University Boulevard, for example, is 150% over the distance for which AASHTO recommends that a pedestrian refuge be provided (60 feet). Therefore:

At the intersection of University Boulevard and New Hampshire Avenue the median island on the east leg should be extended to create a refuge and the medians on the north and south legs should be bulbed-out to six feet minimum in width to create refuges.

The right turn lanes in the northwest and southeast quadrants of the intersection of University Boulevard and New Hampshire Avenue are extremely wide and almost the same width as the adjacent three through lanes. Therefore:

The right turn lanes in the northwest and southeast quadrants of the intersection of University Boulevard and New Hampshire Avenue should be designed to be more perpendicular to University Boulevard. This will reduce the need for the wide lanes, slow down turning traffic, and make it easier for pedestrians to cross.
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In addition:

呼声 On the northeast and southwest corners of the intersection, the proposed landscape panels behind the sidewalk should instead be moved to be adjacent to the curb so that pedestrians are better guided toward the handicap ramps and to break up the expanse of pavement at this large intersection.

Additional graphics that help to explain many of the comments can be found at:
www.mcatlast.org/purple
April 1, 2014

James T. Smith, Secretary
Maryland Department of Transportation
7201 Corporate Center Drive
Hanover, Maryland 21076

Re: Mandatory Referral for the Purple Line

Dear Mr. Smith,

The Montgomery County Planning Board/Parks Commission reviewed and approved the Mandatory Referral for the Purple Line at our regularly scheduled meeting on March 20, 2014. Our comments to the Maryland Transit Administration (MTA) are in Attachment 1, to the Maryland State Highway Administration (SHA) in Attachment 2, and the Montgomery County Department of Transportation (MCDOT) in Attachment 3. As you know, this project is of statewide and regional importance. Accordingly, your assistance is requested to ensure a coordinated joint response by MTA and SHA, constituent agencies of the Maryland Department of Transportation (MDOT).

While MTA is the overall sponsoring agency that will construct the Purple Line, this is a large and complex project that requires approvals from different agencies. Many of the major station areas are located on or near State highways and therefore the assistance of SHA is essential in achieving optimal pedestrian and bicyclist access to these stations. We believe that MDOT should take the lead to ensure the highest level of coordination between MTA and SHA, as well as input from MDOT’s staff in order to achieve the best possible conditions for Purple Line passengers and surrounding communities.

While the project as currently designed is substantially consistent with the County’s approved and adopted master plans, we believe that the pedestrian accommodation and station access in the project area must be improved to ensure the success of the Purple Line. The stations of greatest concern accessible by State roads are Woodside Station, located on MD 390 (16th Street), and Piney Branch Road Station, located on MD 193 (University Boulevard).

The introduction of a rail station and the land use changes recommended by approved and adopted master plans will fundamentally change the nature of many of the Purple Line station
areas from being largely focused on automobiles to being equally focused on pedestrians. Yet pedestrians are not adequately prioritized at these station areas. For example:

- MTA is appropriately proposing a marked crosswalk on MD 390 to provide access to the Woodside Station. However, the crossing as planned is unsafe because pedestrians would be directed to cross MD 390, a six-lane highway with a posted speed limit of 35 mph and an AADT of over 25,000 vehicles, without the protection of a traffic signal.
- The intersection of MD 390 and Spring Street includes an excessive crossing distance on the east leg, requiring two pedestrian signals and three refuge islands to break up the crossing. The intersection geometry also enables vehicles traveling northbound on 16th Street and turning right onto Spring Street to speed across one of the crosswalks. MTA is planning to acquire the Spring Center to the northeast of the intersection and reconstruct the Spring Street bridge over the tracks, so there is an opportunity to make major improvements for pedestrians in an area that connects the Silver Spring CBD with the Woodside Station. With the coming of the Woodside Station, the redevelopment of the Spring Center site after construction of the Purple Line, the completion of the Fenwick Place development at the southwest corner of Spring Street and Second Avenue, an approved redevelopment of the north Falklands parcel, and the potential redevelopment of the southeast corner of the 16th Street/Spring Street intersection, this pedestrian crossing will become far busier than it is currently.
- The proposed Piney Branch Road Station is one of only two Purple Line stations along the entire 16 mile alignment that have a single-ended platform. Station access is from the north side of the platform, so passengers coming from the south have to walk out of their way to get to the station. The longer travel time would decrease the station’s catchment area and therefore its ridership. The Long Branch Sector Plan recommends a traffic signal at the intersection of MD 193 (University Boulevard) and Gilbert Street to not only improve station access, but also to facilitate a connection between the Sligo Creek Trail and the Long Branch Trail to the Northwest Branch Trail. SHA has not yet agreed to provide this traffic signal.

A thorough review of this project is needed with the goal of meeting both AASHTO recommendations for pedestrian facilities and ADA Best Practices at a minimum; the use of both of these policies is recommended by the Federal Highway Administration in providing access to transit stations.
In commercial areas, a higher level of accommodation is required to ensure that transit patrons have safe and adequate access, that potential patrons are encouraged to use the Purple Line and justify the State’s and County’s significant investment in this facility, and to support and promote transit-oriented development. Needed improvements within the Purple Line corridor should be completed in the near term, with the rail facility itself. Other longer term improvements will probably be needed to enhance station access, improvements that will require a partnership between SHA and MCDOT as the P3 design progresses. It is important, though, that additional improvements be identified and dealt with as quickly as possible and responsibility assigned so that construction can be expedited.

Embedding the Purple Line tracks on University Boulevard is of particular importance in this coordination effort. While we concur with the decision to repurpose two travel lanes on University Boulevard for the Purple Line, we believe that this transitway should be accessible to the County’s planned bus rapid transit service unless it is clearly demonstrated that this would have a negative effect on overall transit service.

In addition, we request assistance from the SHA for access to our facility at Long Branch Local Park. The Purple Line will restrict access (no left turns in and out) to the community center and pool facilities along MD 320 (Piney Branch Road). MTA has committed to constructing a new driveway for the park to connect to the Barron Street signal, which will allow for left turns out of the park, but left turns in remain a problem. While this is a state highway, the park includes County facilities. We would like MDOT and SHA to work with M-NCPPC, Montgomery County Department of Parks and Montgomery County DOT to find a way to allow left turns into the park directly from Piney Branch Road, particularly during large community events and swim meets at the park; this would eliminate the need to make circuitous detours on County streets through the neighborhood to make the turn.

While MTA is only required to meet minimum MDE standards for stormwater management on this project, there appear to be significant opportunities to retrofit existing untreated impervious areas that drain through the project area to help mitigate some of the existing water quality issues along this urban corridor. M-NCPPC requests that MDOT view this as an opportunity to provide additional stormwater management treatment to these areas and continue to work with the Department of Environmental Protection and the Department of Parks to determine stormwater management opportunities within the impacted watershed. Additionally, it is imperative that the design team identify ways to maximize on-site treatment, ensure impervious runoff is actually intercepted, and balance the treatment facility
capacity with the impervious areas draining to them. There is significant potential to address the state and local water quality goals by combining the efforts and funding of various agencies through this process.

Finally, I would like to ask that you identify a point of contact for issues that require a high level of coordination. This person would provide a way to make you aware of issues that come to our attention and have them addressed as efficiently as possible.

Thank you for your assistance in coordinating a joint response from MDOT that reflects coordination between MTA’s and SHA’s responses to the individual Planning Board/Parks Commission recommendations, as well as any necessary input from your staff. We request that these responses be provided to us within 45 days. If you have any questions or comments concerning our review, please do not hesitate to call me at 301-495-4605, or you may call David Anspacher of our staff at 301-495-2191.

Sincerely,

Françoise M. Carrier
Chair

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Cc:
Jamie Kendrick
Mike Madden
Stuart Montgomery
Jeffrey Folden
Sean Johnson
Gary Erenrich
Glenn Orlin