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Baltimore, MD

Suite H
9900 Franklin Square Drive
Baltimore, Maryland 21236
410.931.6600
fax: 410.931.6601
1.800.583.8411

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443.290.4060

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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 respond to comments received from the Maryland Department of Transportation State Highway Administration (MDOT SHA) in a letter dated April 13, 2021, in reference to the review of the Concept Plan for the Takoma Junction development.

The development team of this project (NDC) has met multiple times with MDOT SHA, the Montgomery County Department of Transportation (McDOT), the Maryland-National Capital Park and Planning Commission (M-NCPPC), and the City of Takoma Park to address issues relating to facilities for pedestrians, bicycles, and transit facilities as suggested by the above agencies with Vision Zero principles in mind and the multi-year Visioning Study prepared by MDOT SHA. Although they are not applicable because we are dealing with roadways, we also consulted the Montgomery County Complete Streets document.

As part of these discussions, multiple changes have been made to the plans in order to achieve most of the suggestions requested of the government agencies, to include the following:

- a. Maintain all-RED pedestrian phases for the signalized intersections as requested by the community and the respective government agencies.
- b. Widen the right-of-way and modify lane widths along the site frontage to achieve sufficient width for a bicycle lane and a layby lane.
- c. The current design plans take into consideration Vision Zero and traffic safety needs in the vicinity of the site.
- d. The site access has been revised to a right-in/right-out only access.
- e. Public community space was enhanced along the frontage of the property to provide a safe and efficient pedestrian circulation plan.

- f. Maintain the existing bus stop in the vicinity of the site and provide bus shelter.
- g. The goal of the layby lane is to prevent delivery vehicles from illegally stopping in the eastbound through lane (curb lane) blocking traffic flow. This process of illegally parked vehicles occurs throughout the week within Takoma Junction. The following photographs show what will occur without a layby lane servicing the Takoma Park businesses:



Photograph shows a WB-62 semi-trailer sitting half in the intended area with the rear of the trailer out into the southbound right turn lane to westbound Carroll Avenue. There is a UPS delivery truck sitting behind the semi-truck. During the morning peak, this creates delays for southbound traffic flow.



Photograph shows sidewalk view looking to the north.

The following are new comments which have been raised by your office and our response to each.

Engineering Systems Team (EST) Comments (By: Urooj Zafar):

Comment No. 1 – Sheet Site Plan C2.01 – Subsequent submittals should show details or callout standards for pedestrian curb ramps, callouts for max cross slopes on sidewalks, and accessible crossings. Verify if a receiving pedestrian curb ramp will be constructed on the north side of MD 195 at Grant Street.

Response No. 1 – The requested information is provided on the updated plan. Below is a recent photo of the receiving pedestrian curb ramp on the north side of MD 195 at Grant Street.



Comment No. 2 – Will it be difficult for trucks and vehicles to exit the layby onto MD 195 so close to the stop bar, signal, and crosswalk? What happens when the traffic is backed up at the traffic light? How will vehicles exit into traffic?

Response No. 2 – As in any urban area that contains a parking lane in close proximity to a traffic signal, vehicles will wait until there is a sufficient gap in traffic flow and exit the parking space or in this case the layby lane when space is available. The traffic signal located at Philadelphia Avenue and Carroll Avenue will provide gaps in eastbound traffic flow for the trucks exiting the layby lane. Any vehicle exiting the layby lane will/should obey the existing traffic signal indications and act appropriately to proceed and or stop. The signal heads for eastbound Carroll Avenue will be more than the 40 feet minimum as outlined in the Manual on Uniform Traffic Control Devices (MUTCD).

Comment No. 3 – Have any studies been performed to verify sight distance issues, making sure a conflict point is not being created for vehicles travelling EB on MD 195 and vehicles exiting the layby?

Response No. 3 – The reason the layby lane stops on the eastern side of the site frontage at the existing stop line for the signalized intersection is so the drivers of all vehicles within the layby lane can see the existing signal heads for the signal to the east. The eastern most layby lane vehicle can easily see the existing signal heads as discussed above allowing the driver to make a safe exit from the layby lane when sufficient gaps appear. The exiting truck drivers will check their rear-view mirrors for bicycles and approaching vehicles and check the signal head indications.

AASHTO minimum stopping sight distance is achievable for travelling vehicles eastbound. A review of AASHTO for local streets indicates stopping sight distance should be 250 feet for design speed of 35 MPH. (Posted speed is 25 MPH plus 10 MPH.) See attached MDOT SHA completed form.

The Philadelphia Avenue approach to Carroll Avenue – the existing stop line for southbound Philadelphia Avenue approach to the traffic signal at Carroll Avenue is more than 250 feet from the beginning of the layby lane. Vehicles turning from southbound Philadelphia Avenue to eastbound Carroll Avenue can see the layby lane immediately while turning onto eastbound Carroll Avenue. The layby lane including a semi-trailer vehicle if present in the layby lane will be visible for eastbound vehicles beginning at the signalized intersection of Philadelphia Avenue and Carroll Avenue.

Additional stopping sight distance beyond the 250 feet will be provided when the truck is in the easternmost parking position. The semi-trailer trucks will desire to be as far east within the layby lane in order to be as close to the Co-Op building that it is servicing. A majority of the deliveries will access the new development including the Co-Op along the easternmost corner of the building (service corridor).

Comment No. 4 – Who will maintain the proposed planting areas? Some areas are within SHA ROW for which we might need some agreements/MOU for maintenance of the planting areas.

Response No. 4 – An MOU will be developed to address these types of issues between MDOT SHA, the City, and the applicant as needed.

Innovative Contracting Division (ICD) Comments (By: John Vranish):

Comment No. 1 – The plans reviewed for the subject project are compliant with the *MDOT SHA Accessibility Policy and Guidelines for Pedestrian Facilities along State Highways*.

Response No. 1 – Comment acknowledged.

District 3 Traffic Comments (By: Alvin Powell):

Comment No. 1 – The developer proposes construction of a layby along the site frontage on MD 195 (Carroll Avenue) to service the proposed development. This layby would allow commercial vehicles up to semi-trucks to deliver goods using the proposed layby. The location is adjacent to the sidewalk and a bus stop. An evaluation of this location and the proposed

operations indicates that restricted access or complete closure of the sidewalk will be required during these operations to allow forklifts to operate within this space. MDOT-SHA has determined that there will be an unacceptable risk to pedestrians from either closure or restricted access. Pedestrians will be forced into a bicycle lane or an active travel lane to maneuver around these vehicles.

Response No. 1 – No forklift activity is expected along the site frontage by the new development and or the existing Co-Op. The width of the loading/layby lane is 12 feet—much wider than a normal parking area width. A 12-foot-wide layby lane can easily accommodate a semi-truck and trash truck or smaller single unit truck such as FedEx and UPS. These trucks typically do not have passengers so the passenger doors which slide on the inside of these vehicles do not open. The driver then departs the vehicle from that side of the truck. There will be practically no door interaction with the pedestrian path east/west.

The pedestrian accessible path will always be open to east and westbound pedestrian flow. Typical delivery truck setup has a lifting platform on the rear of the trailer that allows the items to be lowered down at the rear of the delivery truck. Once items are lowered to street level, they will be hand-carted along the sidewalk, which occurs in all urban areas. FedEx, UPS, and Amazon use the larger box trucks that have sliding doors and present no conflict with pedestrians.

Every effort will be given to utilize smaller semi-trucks such as Sysco Food delivery trucks which are smaller than WB-62 and WB-67.

The proposed layby lane will only allow the semi-trucks and other delivery trucks to access the layby from the west (eastbound traffic flow). Inbound trucks today making left turns into the surface lot must cross the path of the two eastbound lanes traffic flow and immediately interact with the pedestrian crossings. The surface lot access has unrestricted vehicle flow in all directions in and out while trucks are maneuvering.

The planned layby lane keeps all traffic moving in the same direction. Inbound vehicles enter garage from eastbound Carroll Avenue. Exiting traffic from the garage will make right turns to eastbound Carroll Avenue and all traffic in and out of the layby lane is eastbound. The elimination of the conflicting vehicle movements with the westbound traffic flow is a positive safety factor.

Comment No. 2 – Please note that the opening and closing of doors of vehicles parked in the layby into the adjacent bicycle lane will pose a hazard to cyclists using the bicycle lane. We note the narrow width of the layby.

Response No. 2 – The layby lane will be used for delivery vehicles and trash removal vehicles only. Most delivery trucks have sliding doors which would not interfere with the bike lane. There will be a very limited number of trucks that have doors that open and close that could impact the bike lanes. In addition, it will be clear if a truck is parked in the layby lane, and the 12-foot curb lane and 6-foot bike lane (18 feet),

which will be unmarked as agreed, will provide ample space for bikes to avoid conflicts with truck doors. With the added depth, trucks will not interfere with traffic flow along the adjacent streets as illustrated on the photographs on page 2.

Passenger vehicles in parking spaces adjacent to bikeways all across the county also have doors that swing into the bike lane at times—this is not an unusual situation.



Comment No. 3 – Current MDOT-SHA sidewalk construction standards do not support operating commercial vehicles in this manner on the sidewalk.

Response No. 3 – As stated above, forklift activity will not occur within the sidewalk area. Deliveries will utilize handcarts or carts to transport goods as these activities occur everywhere in urban areas. There are no activities proposed that would require sidewalk construction outside of MDOT SHA standards and specifications.

Comment No. 4 – Sight distance on SHA owned and operated roadways shall be computed based on AASHTO standards as presented in the AASHTO Manual and the SHA Access Management Manual.

Response No. 4 – Please see No. 3 above for sight distance responses.

Comment No. 5 – The existing stop bar will need to be extended to go across the bike lane to prevent vehicles from going around other stopped vehicles.

Response No. 5 – The plan will be modified to include the extended stop line as requested.

Access Management Division (AMD) Comments (By: Kwesi Woodroffe):

Comment No. 1 – Based on the Vehicle Access Plan associated with the layby, it appears that a WB-62 will not be able to fully enter the layby without encroaching into the area for the bike lane and will need to perform back up movements to fully be situated inside the layby. This is not a safe maneuver as it would cause cyclists to have to veer into the adjacent travel lane. Also, it does not seem that the layby can be widened or lengthened to allow a WB-62 to fully enter, making this a permanent concern.

Response No. 1 – Please see revised simulation which shows design vehicle making the maneuvers.

Comment No. 2 – Sight distance and visibility for EB traveling vehicles (and cyclists) appears to be inadequate or limited for a WB-62 pulling out of the layby.

Response No. 2 – See No. 3 above in referenced to sight distance.

Based on the following photograph, which clearly illustrates that when a layby lane or parking is provided along the local roadways, that vehicles will have to traverse the bike lane to reach the curb area (loading/unloading or parking). Therefore, the proposed plan is consistent with MDOT SHA standards.



It would be greatly appreciated if you could review the above responses and the revised plans and provide us with any additional comments you may have. Due to the schedule for this project, it would be greatly appreciated if this review could be expedited. In addition, we would welcome the opportunity to meet with you to discuss any concerns.

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

Sincerely,

A handwritten signature in black ink that reads "Paul R. Dorr". The signature is written in a cursive, slightly slanted style.

Paul R. Dorr
Director of Engineering Design

PRD:amr

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