

Coalition for Smarter Growth and Audubon Naturalist Society

September 30, 2008

County Executive Isiah Leggett
Montgomery County
101 Monroe Street
Rockville, MD 20850

RE: Revise Context Sensitive Road Design Standards based on Planning Board recommendations

Dear County Executive Leggett:

Please accept these comments on behalf of the Coalition for Smarter Growth and Audubon Naturalist Society. The Coalition for Smarter Growth is a regional organization focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas. The Audubon Naturalist Society, founded in 1897, fosters environmental stewardship through education and activism in Maryland, Virginia, and the District of Columbia.

Both the Coalition and the Audubon Naturalist Society (ANS) were actively involved in the entire process that brought us to this point. We began our engagement in early 2007 when we worked with the County Council to adopt a "Complete and Green Streets" law that gave new emphasis to street designs for all users and reduced polluted runoff. Based on direction for the Council, your staff conducted an extensive workgroup process. Both of our organizations participated in the workgroup.

We are pleased overall with the proposed standards regarding stormwater management, although we believe that the required stormwater volume targets are too low. In terms of addressing the needs of pedestrians, and to a lesser extent, bicyclists, we are greatly disappointed in the proposed road design standards. After receiving substantial guidance from the Council, the road design standards process followed a worn path of a vehicle-centric approach. This approach continues to dominate the Department of Transportation. We ask that you correct the serious deficiencies of the proposed regulations by adopting the recommendations of the Planning Board.

We appreciate your efforts to improve pedestrian safety through a new fully funded Pedestrian Safety Initiative, ongoing traffic calming efforts, and continued work on bus stop safety. However, road design standards also have a great effect on pedestrian and bicycling safety. These proposed standards fall far short, and undermine the progress made by other efforts to improve pedestrian safety.

We fully support the recommendations by the Planning Board and ask that you revise the Executive regulations based on them. During the entire stakeholder workgroup process, we requested greater attention to the intent of the Council law – specifically focusing on pedestrian safety and access. The process gave far too little attention to pedestrian concerns.

Speed: What little we and others concerned about pedestrian access were able to get into the draft speed standards were subsequently removed. The proposed speed standards for urban roads are too high and threaten to make high-pedestrian activity areas less safe, as the Planning Board report clearly demonstrates. In urban areas, we agree with the Council law and Planning Board recommendations: 25 mph should be the standard.

Travel Lanes Widths: Street cross sections and travel lane widths are also inadequately addressed by the proposed executive regulation. Cross sections tend to be too generous for vehicles and too stingy for pedestrians. We agree with the Planning Board and the approach by Council, that travel lane widths should be minimized to control vehicles speeds and reduce pedestrian crossing distances. Lower speeds increase safety for all users. In suburban areas, the Planning Board recommends narrowing travel lanes from 12 to 11 feet. In urban areas, the Planning Board recommends the use of 10.5 and 10 foot travel lanes -- what the Council approved last year. We concur. This is consistent with best practices from around the country, and more context sensitive to fostering a slower speed, mixed use, multimodal urban environment. For sidewalks, the Board recommends a wider sidewalk standard of a 6 foot minimum. This is consistent with requests from the disabilities community and AASHTO recommendations. We also strongly concur with the staff recommendation that intersection design standards be addressed – street crossings are how most pedestrians are injured or killed.


We also concur with the Planning Board’s recommendation to establish bicycle accommodation performance standards. While lower speeds will make bicycling safer, specific accommodations for bicycles are needed in higher speed or higher volume circumstances. The proposed regulations do not clarify when bicycling facilities should be built. The Planning Board recommendations provide clear guidance. We support the Board’s recommendations and cross sections.

Rural Open Section Roads & Bioswales: We have a clarification regarding open-section roads. The Planning Board report discusses the relationship of target speed and the use of curbs, and it also indicates that, “Open-section standards should be used for roads with target speeds of 45 mph and above.” We want to clarify that one part of the intent of the Council’s and Stakeholders’ recommended road code changes is to make open section roads the default norm for all rural roads, regardless of target speeds. By combining open section roads with bioswales (as recommended by the stakeholders’ workgroup), large volumes of stormwater can be captured and infiltrated. Bioswales are linear channels alongside roads, that filter and infiltrate stormwater through use of soil, sand, gravel and vegetation. The preferred planting materials for bioswales are native wildflowers, tall grasses, and trees. This approach is crucial to Montgomery’s implementation of the Stormwater Management Act of 2007 and its forthcoming 2008-2013 NPDES stormwater permit issued to the County by MDE. Such rural roadway designs, particularly when used in conjunction with appropriate landscaping and planting plans, can also contribute to lower actual travel speeds, and enhanced aesthetics in our rural areas.

Conclusion: We ask that you incorporate the recommendations from the Planning Board into the regulations before forwarding them to the Council. We ask that you delay forwarding this document until your staff has had adequate time to consider the recommendations of the Planning board and other public input.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort
Policy Director
Coalition for Smarter Growth

Diane Cameron
Conservation Program Director
Audubon Naturalist Society