

ATTACHMENT 8



By Electronic Mail

Mr. Khalid Afzal
Division Chief
Maryland-National Capital
Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20850

Re: WMAL Transportation Report

Dear Messrs. Butler and Axler:

As you are aware, in connection with the WMAL development, the community has questioned the Wells + Associates LATR Report (the “Wells Report”) as it relates to the handling of any future NIH expansion pipeline project. The community has suggested that the dispersion of the trips associated with NIH’s future expansion is inconsistent with the applicable LATR Guidelines. During meetings with Staff and the community which occurred this spring, I explained Wells + Associates’ methodology and the regulatory basis for this approach. While I attempted to provide a thorough explanation during our meetings, we nonetheless thought that it would be helpful to restate this information in writing, based on the recent comments provided by the community (indicated by the indented and italicized statements) in order to avoid any future confusion.

- *The NIH Expansion project is forecasted to generate 4,266 PM peak-hour vehicle trips (1,364 AM, 2,902 PM). These figures are consistent between the Scope of Work Agreement and the impact study.*

This is generally a correct statement. The trips generated by NIH used in our analysis are as follows: 3,508 AM peak hour trips (2,692 inbound and 816 outbound) and 4,266 PM peak hour trips (1,364 inbound and 2,902 outbound). The NIH volumes noted above were provided by MNCPPC Staff and are for the maximum amount of development allowed on the NIH campus.

It is important to note that the future trips generated by NIH present a unique situation. Typically, background traffic forecasts represent future traffic conditions based on projects that have obtained preliminary plan approval. In the sequence of the development process, preliminary plan approval occurs well after the initial planning effort and is generally a reliable indicator that a project will proceed to development in the relatively short term, prior to the expiration of the preliminary plan’s validity period. However, because NIH development is exempt from the regulatory process, it is not subject to the preliminary plan process. Instead, the “background trips” associated with NIH are based on the NIH master planning process and the

ultimate build out that NIH has projected. There is no schedule for the future master planned development; this ultimate build out may never occur or if it does occur, it may not do so until well into the distant future. As a result, these figures represents a very conservative/worst case scenario.

- *Unlike the other relevant pipeline projects, it does not appear that there was a traffic impact study submitted for the NIH Expansion Project. Therefore, it wasn't possible for Well + Associates to leverage trip distribution information for NIH. As such, they (Wells) were responsible for generating their own trip distribution for NIH that was consistent with the County's LATR Guidelines.*

The approved Environmental Impact Statement prepared in connection with the NIH Expansion Project included a 2013 traffic report (the "NIH Traffic Report") and in that report, no trips from the NIH Expansion Project were allocated to the residential roads west of Old Georgetown Road.

The Wells Report included the trip assignments that were approved as part of the approved NIH report. As noted, the NIH Traffic report allocated no future NIH trips to Greentree Road, Fernwood Road or any other residential street on the west side of Old Georgetown Road.

Moreover, the LATR Guidelines (July 2013 LATR Guidelines, page 12) do not permit a traffic study to disperse traffic onto lower classified roadways, if the arterials (i.e. Old Georgetown Road) are operating below a CLV of 2,000.

Nonetheless, we note that in an effort to respond to the concerns from the community that NIH would generate additional trips through the neighborhood, the Wells Report allocated two percent of the total future NIH traffic to Greentree Road and Fernwood Road through to the intersection of Fernwood Road and Democracy Boulevard. The two percent increase was based on the 2011 employee survey conducted by NIH indicating that approximately four (4) percent of the existing employees that work at NIH reside in the 20817 zip code area. Given the geographical expanse of the 20817 zip code area, the LATR's projection that one-half of the future employees living within this zip code area (i.e. two percent) would travel via Greentree Road onward to Fernwood Road is generous.

- *Table 4-2 in the LATR Guidelines provide the auto-driver trip distribution for the NIH Expansion project (Super District 1, Bethesda/Chevy Chase). A minimum of four destinations (for PM outbound vehicles leaving NIH) in the table result in significant traffic travelling northbound on Fernwood Road and turning left onto Democracy Boulevard. These locations include rows: 3 (Potomac), 4 (Rockville/North Bethesda), 7 (Gaithersburg/Shady Grove) and 9 (Germantown/Clarksburg).*

Per Table 4-2, as an office development, the total percentage of outbound trips from NIH could be as high as 27%. For most of these routes, Fernwood Road is considered to be an alternative to northbound Old Georgetown Road or I-495, so we don't feel that 27% is fair (it's too high). A conservative estimate is 9%. To put 9% in context, the WMAL study routes 13.5% (i.e., 50% more than 9%) of outbound PM traffic from Suburban

Hospital traffic to the intersection of Fernwood and Greentree (via northbound Fernwood): Suburban Hospital is across the street from NIH.

As noted, the Wells Report relied on data from prior *approved* traffic reports to determine trip assignments for background projects. The Trip Distribution and Traffic Assignment Guidelines, which include Table 4-2, are used to provide distribution guidance for residential and office space, absent any approved studies. Importantly, the traffic distributions used in the traffic study portion of the EIS performed for NIH *were* based on these tables.

- *The Suburban Traffic Impact Study allocates 4.1% of NIH expansion traffic to Greentree/Fernwood.*

This statement is not accurate. The Suburban Hospital traffic report dated 2012 allocated future NIH trips (12 inbound and 11 outbound AM peak hour trips and 8 inbound, and 16 outbound PM peak hour trips) to Greentree Road/Garfield Road intersection and no farther.

We appreciate the opportunity to formally respond to the citizens' concerns regarding our report and its handling of the background traffic.

Very truly yours,



Nancy Randall, AICP

cc: Christina Sorrento, Esq.
Mr. Patrick Butler
Mr. Ed Axler
Mr. Dan Janousek