



DEPARTMENT OF TRANSPORTATION


Isiah Leggett
County Executive

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MEMORANDUM

Revised October 25, 2018

TO: Eric Graye, AICP, PTP, Planning Supervisor
Functional Planning and Policy Division
Maryland National Capital Park and Planning Commission

FROM: Rebecca Torma, Manager 
Development Review Section
Office of Transportation Policy

SUBJECT: Technical Guidance: 2016 Subdivision Staging Policy (SSP)
ADA Noncompliance Test Procedures for urbanized areas

This memorandum provides guidance to the development community on how to perform the pedestrian system adequacy test as required in the 2016 Subdivision Staging Policy (SSP) and the Local Area Transportation Review (LATR) guidelines, Fall 2017. The SSP has a goal to achieve an approximately equivalent transportation level of service in all areas of the County and provides for multi-modal transportation adequacy tests, including a test for pedestrian system adequacy. The SSP requires that any site that generates more than **50 pedestrian peak hour trips** (including trips to transit) must "fix (or fund) Americans with Disabilities Act (ADA) non-compliance issues within a 500' radius of the site boundaries..." Given the 50-trip pedestrian peak hour threshold associated with this adequacy test, it should be noted that this requirement would typically be triggered by **large proposed development projects**. However, there is little additional guidance in the SSP or LATR guidelines for completing this assessment. Based on early experience with this new requirement, MCDOT recommends the procedure outlined below to the Planning Department for determination of project compliance within urbanized areas (Red/Orange Policy Areas).

This procedure is tiered based on the significance for access to the project and likelihood of participation in addressing ADA non-compliance issues by other nearby projects. The applicant's requirements to fix or fund corrections to these conditions will depend on the location of the condition with respect to the project site.

1. **Establish evaluation tiers.** The project-specific tiers should be confirmed at the scoping stage by the Planning Department, in consultation with MCDOT, before any assessment is done. The following guidance is provided for determining the tiers.
 - a. **Tier 1 –Primary sidewalk**
 - i. The public or private street frontage of the project.
 - ii. The same side of street up to the nearest public street intersection, or a maximum distance of 250 feet from the project boundary, measured along the street.
 - iii. Approximately 25 feet along each intersecting street within 1.a.i and 1.a.ii.

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Located one block west of the Rockville Metro Station

b. Tier 2 – Connected sidewalk

- i. The same side of the street as the project between the first public road intersection and 250 feet (if applicable), measured along the fronting street.
- ii. The corresponding opposite side of the street as 1.a.ii and 1.b.i.
- iii. Approximately 25 feet along each intersecting street within 1.b.i, and 1.b.ii.

c. Tier 3 –Network connections

- i. Between 250 feet and 500 feet, measured along the fronting street.
- ii. The corresponding opposite side of the street.
- iii. Along both sides of each intersecting street in 1.a and 1.b, up to the next public road intersection or a maximum distance of 500 feet from the project boundary, measured along the street.
- iv. Approximately 25 feet further along each intersecting street identified in 1.c.iii.

2. Adequacy Determination

a. Tier 1

- i. The applicant should identify and fix ADA non-compliance issues with sidewalk ramps, traffic signals, significant trip hazards, cross slope deviations, and broken, missing, structurally failing sidewalks.
- ii. Beyond the site frontage, the applicant is not required to relocate utilities or traffic signal cabinets, reconstruct utility vaults, relocate fire hydrants, relocate street trees or relocate manhole covers.

b. Tier 2

- i. The applicant should identify and fix ADA non-compliance issues with sidewalk ramps, traffic signals, significant trip hazards, and missing or structurally failing sidewalks.
- ii. A minimum recommended contribution of \$100,000 toward ADA compliance may satisfy this requirement.

c. Tier 3

- i. The applicant should identify and fix ADA non-compliance issues with sidewalk ramps, traffic signals, significant trip hazards, and missing or structurally failing sidewalks.
- ii. A minimum recommended contribution of \$50,000 toward ADA compliance may satisfy this requirement.

3. For applicants to comply with the pedestrian system adequacy test, the contributions should be placed into a CIP fund for the relevant policy area (if applicable) or the countywide ADA Compliance Transportation CIP (P509325).

If you have any questions regarding this memorandum please call Rebecca Torma, at 240-777-2118.