

Action Committee for Transit

www.actfortransit.org

P.O. Box 7074, Silver Spring, MD 20907

March 4, 2008

Mr. Royce Hanson, Chair
Montgomery County Planning Board
8787 Georgia Ave.
Silver Spring, MD 20910

Subject: Woodmont East

Dear Mr. Hanson:

Better use of the area that connects the future Purple Line terminus to Woodmont Avenue is an important step toward enhancing the urban fabric of downtown Bethesda. Unfortunately, the plans for this property that are now before the Planning Board are distinctly inferior to the developers' previous proposal. Instead of maintaining the urban streetfront of Woodmont Avenue, the new building is set back behind an office-park-like plaza resembling the dead spaces that disfigure Wisconsin Avenue and East-West Highway. Opportunities to improve the permanent pedestrian and bicycle circulation of the area are missed.

Because this project would revitalize an important area at the heart of Bethesda, it is preferable to avoid further delay. The Action Committee for Transit believes that there is a solution that balances the need to enhance Bethesda's urban fabric with the desirability of avoiding delay. The developer should be required to construct the permanent Master-Planned A2 hiker/biker trail along Bethesda Avenue and Willow Lane from near Woodmont Avenue to 47th Street, the preferred trail route specified by the Master Plan, in addition to providing access for the optional A1 trail route through the tunnel. Bethesda needs the A2 trail:

- The open-air A2 trail will be attractive for those trail users who will be deterred by the A1 route. The A2 trail will appeal to those who prefer outdoor recreation, who perceive security risks in a tunnel, or simply dislike the low ceiling of the A1 route.
- Building the A1 trail but not the A2 trail could create a misimpression among the public that the low-ceilinged A1 trail will be the only trail through Bethesda after the Purple Line is built. We should make every effort to minimize misunderstanding of the compatibility of the Purple Line and the trail, which has already led to needless public anxiety.
- The A1 trail will be closed late at night and will fail to serve destinations along Bethesda and Willow Avenues.

If a condition requiring construction of the A2 bicycle path is imposed, we would support approval of Woodmont East.

We have some additional comments:

Overhead clearance for tail track - Condition 10 requires at least 23 feet of clearance above the western tail track. Rail operation requires 23 feet of clearance above both tail tracks. Some additional clearance will be needed above portions of the east track to maintain the option of building the A1 branch of the trail in the tunnel in addition to the A2 trail. The condition should be clarified to show the clearance needed above both tracks.

Anti-pedestrian fences - Condition 11 requires the developer to study whether to build a fence along the sidewalk to stop people from crossing the street. This requirement should be deleted. Fencing pedestrians in like cattle is unacceptable in this urban location. Not only will pedestrians be inconvenienced, but their safety will be endangered; fencing sends a signal to drivers that they should move at highway speeds. Furthermore, the fences would block legal bicycle turning movements between the sidewalk and the roadway.

Overstated traffic generation - The traffic analysis predicts that 250 apartments will generate 113 peak-hour trips. This is a gross overestimate. If the same formula is used to predict the traffic from the 190-unit building where I live, located directly across the Bethesda Avenue, it is predicted that one car leaves the garage every 42 seconds. The actual traffic from that garage is much, much less.

The same conclusion was reached quantitatively by the traffic survey for the Bethesda Naval BRAC. The formulas in the county's LATR guidance documents greatly overestimate traffic generation from locations near Metro. In its recent decision on the Glenmont Metrocenter appeal, the County Council made clear that the Planning Board should base its LATR decisions on the actual traffic impact of a project, when the actual impact differs from the formulas in its guidance. Thus the Planning Board must use realistic traffic generation rates rather than mechanically applying its unrealistic formulas. This is especially important because pedestrians' convenience and safety are almost always degraded by intersection widenings that result from LATR calculations.

Pedestrian access from Elm Street - The staff report notes that the project will provide pedestrian access from Elm Street into the interior pedestrian paths, but gives this issue insufficient emphasis. Elm Street will be a major bus terminus connecting to the Purple Line. Many riders will use these buses to reach Woodmont Avenue. In addition, the buses and the new Red Line entrance on Elm Street are likely to enliven the street as a retail destination. The pedestrian entrance from Elm Street needs to have adequate capacity and a proper design treatment to serve as a major gateway into the Bethesda Row area. We do not request an approval condition at this time, but ask that the developer and the Planning Board staff consider this as a design issue.

We appreciate the opportunity to comment on this project, which is of great importance

for the future of Bethesda.

Sincerely,

Ben Ross
President