

adopted by unanimous vote of delegates--October 12, 2009

Montgomery County Civic Federation Position on White Flint Sector Plan Revision-transmitted to County Council at public hearing on October 20, 2009

1) The Montgomery County Civic Federation strongly opposes the density of development proposed in the Plan revision (12,000 more housing units and 25,800 more jobs than currently exist). We believe this level of density will result in traffic gridlock on major arterials in the area, a situation not addressed by the inaccurate transportation study conducted for the Plan.

a) The transportation study assumes a level of Metro Red Line service that doesn't exist. It assumes rush hour Metro service of 8 car trains with 2 1/2 minute headways in each direction and elimination of the current turnaround at Grosvenor Station for many Red Line trains. To implement that level of service from end to end on the Red Line, from the Shady Grove to Glenmont stations, would require a substantial additional number of Metro cars, storage for those cars, and operational costs. WMATA estimates adding a Metro station in the area would cost at least \$50 million, and take 10 years--the lifespan of the Plan.

b) In order for the arterial Level of Service (LOS) in the Plan area to be deemed "acceptable," the boundaries of the Policy Area will need to be expanded in order to increase CLV (Critical Lane Volume) capacity of key intersections, and the Growth Policy would need to be amended to allow LOS of E--traffic moving at less than 25% of free-flow speed. MCCF believes that allowing this service level on our roads would make a mockery of the term "adequate" as contained in Adequate Public Facilities Ordinance.

c) The transportation study acknowledges that Strathmore Avenue and Rockville Pike will fail LATR even with the Metro Station Policy area congestion standard. Strathmore Avenue is the major east-west connection south of the Sector Plan area and already experiences severe backups. And in his testimony on the Plan, delivered to the Planning Board on January 12, County Executive Leggett noted that even with the transportation improvements called for in the Plan and "even with the higher threshold of acceptable congestion, the Plan assumes that two intersections--MD 355 and Old Georgetown Road, and Old Georgetown Road and Executive Boulevard--will fail LATR." MCCF believes this planned inadequacy, proposed to be dealt with by eliminating LATR, is unacceptable.

2) The MCCF opposes the recommended distribution of density in the Plan. To minimize the impact of added density in this area the Plan should promote true transit-oriented Smart Growth, concentrating development within a 1/4 mile core around the existing Metro station (as recommended in the 3rd paragraph, page 26 of the Plan). But, the Plan doesn't follow its own recommendation. Instead, highest densities in the proposed Plan go from well north of Old Georgetown Road to Security Boulevard, while 300 foot building heights are planned from north of Old Georgetown Road to south of Executive Boulevard.

3) The staging in the Plan places improvements to Rockville Pike, and its conversion into a boulevard, into Phase 3--the last stage of the development. As a result, nearly all of the redeveloped density in the Plan could be in place before improvements are made to Rockville Pike, including the addition of bus priority lanes which could be extremely helpful in reducing private vehicle trips in the area.

4) At this time, the MCCF opposes adoption of the implementation authority process proposed to replace and eliminate use of Local Area Transportation Review (LATR) and Policy Area Mobility Review (PAMR), since no details are contained in the Plan. There is also no financing plan included in the Plan. The Plan only recommends a staging element providing 12 months to determine the financing mechanisms as well as a transportation approval mechanism and monitoring program. Residents are being asked to buy into something with no way of determining its viability or impact.

5) The MCCF objects to, and registers serious concern over, the Plan's proposed use of a new zoning category--the CR (Commercial/Residential) mixed-use zone--since the zone does not currently exist. It is impossible for residents to weigh in on use in the Plan of a new zone category without knowing the specific criteria recommended for each individual property to which the CR Zone might be applied (i.e.; total FAR, maximum commercial and residential FAR, maximum height) or possible public amenities which may result

There is no way of knowing the residential capacity, or number of new housing units, which could result from this Plan or any Plan that uses the proposed CR Zone category, since the zoning would not set a maximum number of dwelling units per acre, but rather a maximum residential square footage. This uncertainty will make long term infrastructure planning impossible, since the number of housing units on any property will not be known until each project is approved by the Planning Board. The staging plan will provide some limit on the pace at which new housing can be built in the area, but it only covers 75% of the zoning envelope. Again, residents are being asked to buy into something with no way of determining the impact.

6) The Sustainability section of the Plan includes recommendations to create a healthy, livable urban environment by improving air and water quality, yet individual aspects of the proposed Plan work against this.

a) The Plan proposes achieving a healthy, livable urban environment in the White Flint area by maximizing the use of environmental incentives contained in the proposed CR mixed use zone category, which has not yet been approved by Council. Yet the proposed CR Zone would require that only 30% of total density (above the base of 0.5 FAR) must come from environmental amenities. Furthermore, there is no telling which environmental amenity any individual developer will offer in exchange for maximum density in their project, or which the Planning Board will require.

b) The recommendation to maintain the current amount of impervious land cover (87%) is too weak, even though the Plan also calls for increasing the overall tree canopy in the area and incorporating stormwater management as part of project approval. The Planning staff anticipates that stream degradation will continue in the two watersheds located in the area, but at a lesser rate. We find this is unacceptable.

c) The Plan promotes a land use pattern intended to minimize carbon emissions, ignoring the fact that the traffic gridlock generated by the density levels in the Plan will increase auto emissions.

7) The Federation opposes the proposed building height limit of 60 feet, or 5 stories, for development which is adjacent to existing single-family home neighborhoods just outside the boundaries of the Plan area. This is, quite simply, a bad design standard that will obstruct vistas into the Plan area from edge neighborhoods. For this reason, until recently and with few exceptions, the county standard for transition height of development located adjacent to existing edge neighborhoods of single-family homes has been 3 stories, or 43 feet, for commercial development.

8) MCCF believes that the schools recommendations in the Plan are inadequate. We believe a responsible Plan should address the need for an elementary school in a safe, walkable location in proximity to the hundreds of elementary students to be generated by new development in the Sector Plan area.

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