

Citizens Coordinating Committee on Friendship Heights

January 21, 2016

Nancy Floreen, President
Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Re: Westbard Sector Plan

Dear Council President Floreen:

The Citizens Coordinating Committee on Friendship Heights (CCCFH), consisting of 19 civic organizations, comprising over 7,000 households, in and surrounding the Westbard Sector, requests that the Council substantially revise the Planning Board's Draft Westbard Sector Plan.

We endorse the goals of the draft plan, to create "a vibrant village center", with "preservation of local retail", to provide "neighborhood goods and services serving the surrounding residential community". Development is to be on a "neighborhood scale", "preserving compatibility with adjacent residential uses." (draft plan pp.6, 18).

The Council should revise substantially the draft Planning Board Westbard Sector Plan because it is inconsistent with these goals because of the excessive amount, type and height of development.

Retail: The large amount of retail allowed by the draft plan is well beyond what is needed or appropriate for a neighborhood serving center and is more like a regional mall. It will promote large stores not serving neighborhood needs and attract visitors from a wide geographic area. But local businesses on which residents have depended are unlikely to survive.

If all properties allowed commercial development under the Commercial Residential Town (CRT) zones in the draft plan are developed to the maximum, then the total commercial square footage would amount to 1,502,459 square feet.

This would be larger than regional malls. For example, as of January 2012, Montgomery Mall was developed with a 1,242,172 square feet. Congressional Plaza on Rockville Pike, a regional shopping destination, has 328,000 total square feet. And Federal Plaza, located at the intersection of Rockville Pike and East Jefferson Street in Rockville has a total of 248,000 square feet.

Residential Units: The draft plan would allow a very large number of new dwelling units. A significant number of these will generate students overcrowding our already overcrowded schools for which no realistic plan to accommodate them has been offered, especially on middle and high school levels.

Representing the Citizens Associations of Brookdale, Chevy Chase Village, Chevy Chase West, Drummond, Glen Echo Heights, Green Acres-Glen Cove, Kenwood, Kenwood Condominium, Kenwood House Cooperative, Kenwood Place Condominium, Mohican Hills, Somerset, Springfield, Sumner, Sumner Village Condominium, Westmoreland, Westbard Mews, Westwood Mews, and Wood Acres

There currently are 1104 residential units in the Westbard sector. If all properties that allow residential units under the CRT zones developed to the maximum number of residential units under the draft plan, then the total number of units will be 5,049.

This would be far larger than the adjoining residential neighborhoods combined. Springfield has 650 residential units. Kenwood has 296. The town of Somerset has 413. Green Acres Glen Cove has about 350. Westmoreland has about 1000. Sumner has approximately 550.

Total Floor Area Ratio in CRT zones on Westbard Avenue and River Road

To align the plan's goal of a vibrant village center, and the provision of "neighborhood goods and services serving the surrounding residential community" with development on a "neighborhood scale", while "preserving compatibility with adjacent residential uses", it is absolutely necessary to reduce the Floor Area Ratio (FAR) of areas designated CRT in the draft plan. Overall, the FAR in the Planning Board's draft sector plan for these areas is way too high. In the context of this neighborhood area, it allows for supersized buildings, excessive retail and too many residential units. We believe that overall a total FAR of 1.5 for sites appropriately zoned CRT on Westbard Avenue (p. 63) and River Road (p. 69) would allow a significant amount of development, while keeping the development from being way out of scale for its surroundings and the goals of the plan. This total FAR of 1.5 does not apply to sites 2 and 6a (draft plan p. 63), which should be townhouses, areas that should be remain being zoned industrial (p. 17), Washington Episcopal School (p. 75 site 1) which at most should be residential, or the library, which are discussed below.

We now turn to individual sites in the Westbard sector.

The main Westwood shopping center site, west of Westbard Avenue (p. 63 figure 3.1.1 site 1):

This site is approximately 10 acres, which in terms of square feet is 440,000 square feet. Currently there are about 111,000 square feet of retail on this site, which currently is anchored by a Giant supermarket. The Planning Board has proposed to zone it Commercial Residential Town with a total Floor Area Ratio of 2.0 (draft plan p. 63 site 1). More specifically, the proposed FAR is 2.0 overall, with a commercial (C) maximum of 1.25 and a residential (R) maximum of 1.25, and a maximum height of 60 feet. At a FAR of 1.25, 550,000 square feet of retail could be developed, within a total of 880,000 square feet of developed commercial and residential space. This is excessive as explained more generally above. We request a FAR of 1.5 with a C of 0.75 and R of 0.75, and a height of 60. A C of 0.75 would allow about 330,000 square feet of retail which is about three times what is there now. More is not needed for local (ranging to the beltway to the west and beyond) needs.

Manor Care site (p. 63 figure 3.1.1 site 2):

CCCFH has major concerns about this parcel of property that is located in the Springfield residential neighborhood. It is a section of property with frontage on Ridgefield Road, between River Road and Westbard Avenue (erroneously referred to in the draft plan as Westbard Drive), labeled as parcel A on page 67 of the draft sector plan. It is currently zoned R60 (p. 17) with a maximum height of 35 feet (p. 47). The draft plan's zoning is for Commercial Residential Town with a height of 55 feet (p. 63). This property is in a single family neighborhood and in fact is zoned for single family homes. Single family homes are adjacent to and across the street, and it is on a block that has 21 single-family homes. The CRT zoning recommended - 1.5, C-.25, R-1.5, H-55 feet (area 3 p. 63) - allows for development of a multi-unit apartment or condo building with a small commercial property. This would significantly impact this block of single-family homes on Westbard Avenue, including changing its character, noise, traffic and parking. To protect these adjoining residential homes, this area should be rezoned a TH (Townhouse) zone with a height of 45 feet.

Westwood II site (p. 63 figure 3.1.1 site 3):

CCCFH also has major concerns about the proposal for a 90 foot building on the current Westwood II site (p. 63 area 3) which is incompatible with single family homes both directly and diagonally across the street at Westbard Avenue and Ridgefield Road in the Springfield neighborhood. The Westwood II parcel is on the southeast corner of the intersection of Westbard Avenue and Ridgefield Road north of parcel 128 on page 67. It is currently zoned CRT with a maximum height of 35 feet (p. 17). Planning staff recommended a maximum height of 75 feet on this property, but the Planning Board upped it to 90 feet. We believe the Westwood II area should be rezoned to a maximum 45 feet. This height would serve as a transition from residences at the intersection of Westbard Avenue and Ridgefield Road to the high rises beginning with the HOC property on Westbard Ave, which would be zoned at 75 feet.

The HOC site (p. 63 figure 3.1.1 site 4):

The Planning Board has proposed two 75 foot buildings on this site at 5401 Westbard Avenue (p. 63 site 4). In our support for affordable housing, we agree to that aspect of the proposal, if practicable. But we do not support a further residential building on the library site, discussed below. We note that site 4 extends to the other side of Willett Branch which makes the site fairly large, but placement of buildings is not permitted in the Willett Branch's flood plain.

The Bowling Alley/Citgo service station site (p. 63 figure 3.1.1 site 5):

The Board has proposed a 110 foot building on this site (p. 63 area 5). We do not oppose a building of 75 feet on this site, but in light of aesthetic concerns regarding the appearance of the north side of Westbard Avenue and concern over the excessive number of residential units that would be allowed in the sector, object to anything over that height. We note that site 5 extends to areas sloping down to the Willett Branch which likely are unsuitable for building.

Park Bethesda site (p. 63 figure 3.1.1 site 6a, b):

CCCFH is opposed to the proposed CRT zone on lot 6a (draft plan p. 63) which is north and uphill from the residential town house developments of Westwood Mews and Westbard Mews on Westbard Avenue beginning at Massachusetts Avenue (draft plan p. 83). In light of these residences, there should be zoning for 35' town houses on site 6a (plan p. 63). North of that, to transition to the tall Park Bethesda building, site 6b should be a CRT zone with heights no more than 35' on the south side of the proposed connector road and gradually increasing from 35' to 75' on the north side of the proposed connector road (pp. 63, 79). The proposed connector road should be built as close to the existing Park Bethesda building as possible, as indicated by the Planning Board draft. Our view would allow another building behind the existing park Bethesda building and on one side of the Capital Crescent Trail, and that a new building could be approximately the same size as the existing building. The draft plan would allow two additional buildings, which is too much.

Proposed New Connector Road from River Road to Westbard that abuts the Crescent Trail (p. 63 figure 3.1.1 partially between sites 6a and b):

Any new connector road must connect to Westbard Avenue as close as possible to the Park Bethesda building. (pp. 29, 63, 79) Also this road should not encroach on the natural and elemental aspects of the Capital Crescent Trail (pp. 44, 47).

Library (p. 83):

CCCFH supports a free standing library on its existing site, and opposes a floating zone that would add additional height for further development. Commercial construction should not be introduced to Massachusetts Avenue in the Westbard sector. Also, that development would be too high in part because it is directly across from townhouses.

River Road vision (p. 69):

The Planning Board proposes 75 foot heights on both sides of River Road (p. 69). Seventy five feet heights are too high. This leads to an excessive amount of commercial space and number of residential units, as explained above. We believe that a mixture of 3 or 4 story commercial and residential mixed use buildings on River Road is more appropriate and in keeping with the surrounding residential neighborhoods and a reasonable number of new units and space. Again the total FAR should be 1.5 for CRT zones on River Road. We note that parcels 131 and 133 on River Road (p. 73), which are now occupied by American Plant and The Roof Center, go over Willett Branch and construction of a building over the stream would be problematic.

There should be effective setback requirements on River Road properties, for pedestrian safety and to avoid a canyon effect. This is feasible, as is demonstrated by the McDonald's property. A stop light is needed at River Road and Landy Lane for elderly, Washington Episcopal School, Westland Middle School and other pedestrians and traffic.

It needs to be recognized that for suburban retail to be successful, customers need to drive there, shop and leave, often within an hour. The large amount of retail in the draft plan will generate a large number of trips by vehicles entering and leaving parking areas for the retail businesses. On top of that, deliveries must be made to stores. River Road and Westbard Avenue, among others, lack the traffic capacity for access to large scale new development. The net result will be cut through traffic in neighborhoods, particularly in the Springfield and Kenwood neighborhoods. The draft plan does not address this very significant problem. Also, there is no explicit reference in the Capital Improvements Plan for improvements.

Washington Episcopal School including adjoining senior housing building (p. 75 sites 1 and 2)

Site 1 (pp 17, 20, 75) the Washington Episcopal School (WES)) and the adjoining site 2 (p.75) (Senior Housing) were previously zoned PD-28 as part of the developer's application and housing. (see also p. 17) *No commercial was authorized.* The draft sector plan would rezone the property CRT with the option of a C of 1.0 on site 1 and on site 2 a C of 0.75. This could result in about 500,000 sq ft of retail development on the more than 11 acre property should WES sell the property (as may happen with this incentive). There is no need for commercial development in this plan area as the draft sector plan already calls for too much, discussed elsewhere. Further, the site is inappropriate for commercial development as it is next to Kenwood, Kenwood House, Somerset and other residences, and a principal road access is Little Falls Parkway, through a park where commercial traffic is prohibited. In the long run, this property should be used for public use such as a school or residences, which is consistent with the goals of the PD zoning. The commercial zoning should be deleted, leaving solely the residential zoning as the draft plan currently designates, subject to the height limit of 55 feet for site 1 and assuming that the highest height of 97 feet is for only site 2, the senior housing project (p. 75). The sector plan language implementing the binding elements adopted by the Council in granting the PD-28 rezoning must also remain (p. 75). The sector plan also should recommend that if the school use by WES is discontinued, the property should be considered for acquisition by the County for public use, such as an elementary school or park.

Light Industrial Zoning:

CCCFH strongly supports maintaining the existing industrial zoning (see p. 17) because this is one of the few down-County areas inside the beltway that provides commercial retail services such as landscaping services, car repairs and other local services. These services are invaluable. Also, these services are no longer available in Bethesda, as it grows and adds populations that need these services. Areas that are zoned Moderate Industrial (IM) should be left as such and not be converted to floating zones. (draft plan pp. 79, 69) We support the draft plan's terms to retain existing gas stations. (pp. 63, 68).

Protection of local merchants:

The local merchants have provided much needed services and a "home town" identity for all who have utilize the Westbard Shopping Center for many years. More needs to be done to

provide for a transition to the new commercial area that protects the integrity of these businesses and allows for their continued existence both during and after the reconstruction.

Willet Branch:

CCCCFH commends the Planning staff for thinking creatively about how to dramatically improve the Willet Branch, especially on the south side of River Road. This should be recognized as an amenity in the sector plan. The plan, however, lacks and needs to include a mechanism for requiring contributions for this amenity in the course of development. This omission needs to be corrected; if it is not, there will be an unfortunate repeat of the park advanced in the 1982 Westbard sector plan. Nothing was done.

Funding of amenities:

We want the amenities envisioned in this plan to be realized which would be a stark contrast to the failure of the 1982 sector plan regarding the public realm. We support developers providing amenities as listed in the plan and the use of public-private partnerships when appropriate. We are concerned that here, as in the past, amenities will not be realized because there is a lack of sufficiently specific requirements, including developer funding, linked to future development on specified parcels. We also support having the County Council put funds in the Capital Improvement Program to undertake certain activities such as land acquisition for the Countywide Urban Recreational Park and Willett Branch Greenway and to fund support for alternative transportation such as cycle tracks and a new transit area.

Transportation:

Westbard Avenue must remain a four lane road, especially for traffic movement during rush hour. Parking needs to be allowed in non-rush hour periods, as it is needed for current residents and will be needed for future residents.

CCCCFH opposes adding a shared use path on the eastern side of Westbard Avenue (p. 37) which would reduce by 6' the modest grass buffer between the town houses of Westwood Mews and Westbard Mews and Westbard Avenue. The townhouses are relatively close to Westbard Avenue and the grass buffer is important for the character of the houses. Shared use paths are not needed on both sides of Westbard Avenue and adding one on the western side, as proposed, is adequate and would only encroach on woods abutting the Westland school property.

Schools:

We do not see the Planning Board draft as providing viable solutions to the overcrowded schools situation, particularly in the Whitman Cluster, which will bear the brunt of most of the new development planned along Westbard Avenue. Before the Sector Plan is adopted by the County Council the existing communities need to know specific options for relieving the current and potential future overcrowding at Pyle Middle School, which is now at 118-119 percent capacity and Whitman High School, which is also over 100 percent capacity.

Staging:

The planners have said that the transportation system and public schools can accommodate the impact of housing and retail that is being proposed. We are concerned that the plan may be optimistic and that the transit improvement and schools will not be able to keep pace with the development. We support a check-in after a certain amount of housing or retail is developed to determine whether traffic is at an acceptable level not only on major roads but also on neighborhood streets and whether schools are over-crowded. If either transportation levels or school enrollment is beyond what is acceptable, no further plans should be approved until mitigation measures are taken.

Sincerely,



Barbara Zeughauser
Vice Chair
Citizens Coordinating Committee on
Friendship Heights