

Citizens Coordinating Committee on Friendship Heights

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CCCFH COMMENTS ON WESTWOOD PRELIMINARY PLAN AND SITE PLAN (DRC AGENDA OF JULY 17, 2018)

The Citizens Coordinating Committee on Friendship Heights, which includes 18 communities in and around the Westbard sector, is hereby providing its initial comments on Regency Centers preliminary plan (Plan Number 120170170) and site plan (Plan Number 820180190) applications for Westwood.

This multiuse project at Westwood is huge. Its character and quality will affect tens of thousands of people for generations to come. Much of its physical configuration will likely last well more than a century. What is about to occur at Westwood is for all practical purposes irreversible and must be designed properly for safety, convenience and environmental stewardship now with the future in mind to avoid creating a nightmare for residents and neighbors.

INTRODUCTION

Regency Centers (also known as Equity One) has submitted a preliminary plan for a major multiuse development. This major project will be staged in two phases: Phase 1= Westwood I, by far the largest phase; Phase 2= former Manor Care and Westwood II properties. Note, also, that Regency owns other properties adjacent to these two sites, which it's reasonable to assume will be redeveloped in the future, further increasing the number of residents, works and customers traveling to and from the area.

Phase 1: In Westwood I, Regency Centers proposes two very large buildings facing Westbard Avenue. One is entirely retail including a major supermarket. The other is an apartment complex sited on upper stories above ground level retail which is facing Westbard Avenue; parking is provided at ground level behind the retail. From one end to the other, the storefronts in the two buildings occupy about 840 linear feet plus about 150 feet for the Central Green and access road for a total of 990 linear feet along Westbard Avenue, i.e., nearly 1/5 of a mile. A townhouse complex is planned to the west behind these two large buildings.

Phase 2: The commencement of Phase 2 is unspecified. Manor Care (which stands empty and to the dismay of adjacent residents had vagrants living in it last year) will at some future date be demolished and replaced by townhouses. Similarly, Westwood II will be replaced at a later unknown date with a higher building. The Westbard Avenue realignment, which is part of the Sector Plan, is presented as being initiated as part of Phase 2. While the Westbard Sector Plan also calls for naturalization of Willett Branch and the Willett Branch Greenway, Regency Centers plans are all but mum about that obligation.

WESTWOOD I

Central Green

The Central Green should be a civic green that is of sufficient size, useful to the public, safe and inviting. In fact, Regency Centers Westwood redevelopment website says "The revised plans focus on creating an

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updated neighborhood gathering place designed first and foremost for the local community.” Under Community Open space it says: “The Central Green has been improved from a design standpoint and increased in size to a full half acre, approximately 85 feet wide by 260 feet long, which we feel is large enough to maintain the “human scale” that is so important to creating a vibrant, walkable place.” This recognized concept should be included in the Central Green design. There should be one-half acre, measured from one end of green space to another end of green space. How much of this one-half acre is in fact green space? Regency Centers should not be allowed to count perimeter commercial outdoor space, walkways etc., which reduce the green space that is so desperately needed. Regarding safety, the main entrance to the site forms one border of the Central Green. A plan that has children playing immediately adjacent to traffic is very poor indeed.

Westwood I Traffic Circulation

The proposed Westwood I traffic circulation is very troubling and should be rejected. CCCFH is particularly troubled by a major entrance toward the middle of Westwood I with a road adjoining the Central Green. (And, assuming a traffic light there, we believe that this would be the major access way into Westwood I). This road and its attendant traffic would make the Central Green less than inviting, especially for people with young children; would divide and be a disincentive for walks between the two buildings’ shopping areas; and, would be dangerous for those who would cross the two-way traffic. We propose an alternative circulation plan. There would be three entrances to Westwood I: (1) near Springfield Park (similar to the location in Regency Centers applications), (2) into the parking lot in the supermarket building (similar to Regency Centers proposed location) and (3) at the southern end adjacent to the loading dock for the proposed supermarket. Where this new and expanded southern intersection connects to Westbard Avenue, we propose that there would be a traffic light.

Traffic signal lights related to both (1) Westbard Avenue/River Road/Ridgefield Road and (2) entry and egress from the Westwood I shopping center area are necessary. Regency’s “Traffic Signal Warrant Study and Operational Analysis” (June 15, 2018) in the preliminary plan file has two traffic signals on Westbard Avenue for ingress and egress from Westwood I and merely a stop sign at the reconfigured Ridgefield Road and Westbard Avenue. As is evident, Regency would advantage the Westwood I tenants and residents (with a traffic signal) over the general public (treated shabbily with a mere stop sign). As discussed below, a traffic signal is needed at the reconfigured intersection of Westbard Avenue and Ridgefield Road. The existing traffic signal at Westbard Avenue and Ridgefield Road needs to remain in place until the reconfigured intersection is operational.

Internal Perimeter Road

In addition, an internal perimeter road would go from the entrance at Springfield Park, behind the two new buildings and to the new southern intersection with Westbard Avenue. The townhouses would be behind this new internal perimeter road, and there would be turnoffs from it to parking in the two new buildings.

The sufficiency of the width of Regency Centers proposed internal roads needs to be demonstrated, starting with cross sections with widths.

Traffic to Westwood I

Regency Centers presented “Plan Changes” at its pre-filing public meeting, which stated the number of trips. Data and assumptions were not presented and were not provided by Regency Centers in response to our request. Also, it is unclear how the total traffic count, counting both traffic to/from Westwood I and traffic on Westbard Avenue that does not go into Westwood I has been factored in.

Heights

It is unclear what the basis is for the measuring points in the site plan (variously, e.g., 261.75, 264.5, 267.6) for each of the two proposed large buildings. We believe that it should be at the foot facing Westbard Avenue. Similarly, it is unclear where the heights of each of the townhouses is measured from.

The height limit in the Sector Plan is 60 feet. However, it appears that Regency Centers wants to build higher than 60 feet (e.g., https://eplans.montgomeryplanning.org/UserFilesSource/13810/47505/09-ARCH-820180190-A103.pdf/09-ARCH-820180190-A103.pdf_V2/09-ARCH-820180190-A103.pdf, https://eplans.montgomeryplanning.org/UserFilesSource/13810/47505/09-ARCH-820180190-A204.pdf/09-ARCH-820180190-A204.pdf_V2/09-ARCH-820180190-A204.pdf). This is unacceptable.

Townhouses, Apartments, and Parking

Westwood I is almost 2 miles from the Friendship Heights Metro station and over 2 miles from the Bethesda Metro station. Bus service is not frequent. Walking along River Rd. to reach the Metro is hazardous because of the 30 curb cuts and narrow sidewalks along this major commuter artery. Regency Centers does not plan to provide a shuttle bus. By and large, cars are and will be the only way to come and go to Westwood. There needs to be ample parking space for those vehicles.

The Site Plan does not demonstrate in real world terms that it provides for sufficient parking. As provided in the site plan cover sheet, there would be 190 residential units including sixty-five (65) 2 bedroom and four (4) 3-bedroom units (with apparently 1 parking space allocated for each unit before reductions). There would be 72 townhouses. Note that according to Preliminary Plan 120170170 minimum permissible parking for MPDUs is 0.500 spaces/unit and maximum is 1.000 spaces/unit. It is intuitively obvious due to the lack of public transport that most of the residents in the MPDUs will need a car if they're located at Westwood.

Regency Centers seems to take a reduction from requirements, although a plain English explanation of its methodology is lacking. All told, given Regency Centers opaque presentation, this lacks credibility. It must be recognized that families often have more than one car. In addition, there would be visitors and guests of residents. Also, the existing shopping center provides a historical reference. But there is no acknowledgement that the existing parking lot has very large numbers of cars as residents shop before and during holidays and in severe weather.

Stormwater runoff

Chesapeake Bay pollution has been a serious environmental issue for many years. A great deal of environmental legislation and huge sums of money have been invested in an effort to improve the runoff that has had a deleterious effect on aquatic Bay life jeopardizing the vital contributions the Bay makes to the regional economy. The source of the problem is the accumulation of innumerable small pollution sites and urban area stormwater is a very large contributor to the problem. We expect at a minimum that the project will conform to all laws and regulations pertaining to stormwater runoff and that in particular no waivers will be sought for relief from any such laws and regulations. The Sector Plan addresses this advising that waivers for stormwater retention should be limited (page 58 last sentence).

The net lot area of Westwood I is 496,096 square feet or 11.39 acres. The proposed development will be two very large buildings, 72 townhouses, impervious roads, curbs, impervious walkways, and ramps. The proposed impervious area would be 9.70 acres. See:

https://eplans.montgomeryplanning.org/UserFilesSource/5427/26657/12-SWM-120170170-001.pdf/12-SWM-120170170-001.pdf_V2/12-SWM-120170170-001.pdf.

To address the huge amount of runoff from this very, very large impervious area, Regency Centers proposes:

- a modest amount of green roofs on the two large commercial buildings (approx. an acre) (Regency Centers attempts to make the green roofs appear better by referring to them as extensive; saying it does not make it so),
- Micro bio retention areas
- And several vaults. https://eplans.montgomeryplanning.org/UserFilesSource/5427/26657/12-SWM-120170170-001.pdf/12-SWM-120170170-001.pdf_V2/12-SWM-120170170-001.pdf.

How and how well the vaults function is unclear and how long and well the micro bio retention would work are at best questionable. The applicable Environmental Site Design (ESD) requirements, and whether Regency's plans meet each and every one of them and the basis for any such conclusion needs to be scrutinized, transparent and proven acceptable. This has not been done.

This is not a credible stormwater abatement plan, and we urge the County to reject it and require Regency to revise and resubmit the plan before allowing the project to move forward.

Design Guidelines

There has been a delay in design guidelines for Westbard. They should be adopted by the Planning Commission on an interim basis and applied to the Westwood I buildings. In this regard we note that the design guidelines have been helpful in Bethesda.

Tree variance

Regency Centers has submitted a forest conservation tree variance request. <https://eplans.montgomeryplanning.org/UserFilesSource/13810/47507/10-VAR-820180190.pdf/10-VAR-820180190.pdf>. We do not believe there is sufficient justification to remove trees except in the context of the Westbard Avenue realignment. Instead, we expect that Regency should plant more trees than they remove to meet the expectations set by their own concept drawings and the County's Tree Canopy laws which aim for 50% tree canopy.

WESTBARD AVENUE AND RIDGEFIELD ROAD

Retail and Constriction of Westbard Avenue

Westbard Avenue is a critical artery between River Road and Massachusetts Ave. The River Rd-Mass Ave. connections are very limited and allow for traffic to move from the Beltway into downtown D.C. and vice versa. They consist of:

- Goldsboro Rd – two lanes
- Westbard Avenue – four lanes
- Little Falls Parkway – two lanes (trucks are prohibited and turns from Massachusetts Ave. are restricted during peak hours)
- Western Ave. – two lanes

The agreement with the Planning Dept. incorporated into the Westbard Sector Plan is for Westbard Ave. to have four lanes open during peak traffic hours with parking permitted in off-peak hours.

To offer a plan with retail lining Westbard Ave. raises serious concerns about the propensity of customers to park illegally for five or ten minutes to rush into the cleaners or to grab a cup of coffee, etc. We anticipate demands for harsh parking enforcement during those hours which is not conducive to a positive experience for either retailer or customer.

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CCCFH understands the role of traffic exposure in attracting retail customers, but why not have retail on the west side of the plan providing, e.g., coffee and a cleaners? i.e., get the short-term destination commuter service retail and coffee off of Westbard Ave. and into the interior, including perpendicular to Westbard Ave., of the site? Existing retail is on the interior and has been heavily patronized for many years.

Failing that, why not have an interior service road paralleling Westbard Avenue?

Realignment of Westbard Avenue

Secondly, Westbard Ave. is already burdened with a lot of traffic, before the added traffic of construction over the numerous years of Regency Centers development program, plus increased trips to the new Westwood I for shopping, trips to new residential units, and ever-increasing commuter traffic toward DC. With this in mind note that the Sector Plan calls for the realignment of Westbard Avenue. This is essential to a facilitate flow of traffic. The Westbard Ave., Ridgefield Rd., and River Rd. connection is already badly congested during peak hours. It is a priori obvious that all of the factors associated with the implementation of the Regency Centers plan will seriously aggravate this problem. As discussed below, Westbard Avenue Realignment must be done in Phase I.

Westbard Avenue Extended

Construction vehicles must be prohibited from using the extended Westbard Avenue between River Road and Ridgefield Road, and the Manor Care site, zoned residential, should not be used as a construction depot or parking area. The Springfield community along Westbard Ave. (extended) continues to make every effort to convert that street into a cul-de-sac. Conversation with Montgomery Co. DOT confirms that a cul-de-sac has become the DOT plan for that street.

Ridgefield Road

All construction vehicles must be prohibited from transiting through the Springfield neighborhood on Ridgefield Road west of Westbard Ave., i.e., prohibited from heading northwest through the residential community rather than directly to River Road.

School Bus Stops

Where would school buses stop in the morning and in the afternoon? What student populations is Regency Centers projecting (not counting HOC)?

WESTBARD AVENUE REALIGNMENT -MUST BE DONE IN PHASE 1 OF THE PROJECT

The realignment of Westbard Avenue is critical. It is both an important element of the Westbard Sector Plan and a recommendation of the Sector Plan. It is an important part of the infrastructure associated with the significantly expanded Westwood I shopping center and proposed apartment complex. If Phase 2 and the realignment are delayed, the traffic situation will be intolerable. Even worse, over the very long term, if the realignment does not occur in Phase 2 then what?

The cover Sheet to the Preliminary Plan, note 12, says:

“Proposed right-of-way abandonment associated with the Westbard Avenue realignment to be initiated as Part of Phase 2. Abandonment will be subject to the County Council right-of-way abandonment process. Abandonment must be completed prior to recordation of the first plat associated with Phase 2.”

This is very vague; it is grossly deficient. It talks of initiation, but not undertaking. Where do the obligations lie and how are they legally enforceable obligations that cannot be evaded? If Regency Centers sells the Manor Care and Westwood II properties outlined for redevelopment in Phase 2 to

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another developer is there any incentive for that developer to do the realignment given the large capital outlay required?

Difficult and Dangerous – Current Intersection of River Road and Ridgefield

Referring to this intersection as dangerous does not overstate the case. Absent realignment as part of planning for the initial reconstruction at Westwood I, and in advance of the commencement of construction Regency Centers needs to widen Ridgefield Road at the intersection of River Road and Ridgefield to add a lane so trucks can make a 90 degree turn from eastbound River Road to enter the area without endangering others or impeding traffic flow.

The linked video illustrates the maneuvers a Giant delivery semi going to the shopping center has to make in order to turn onto Ridgefield Road without facing traffic in the oncoming lane.

<https://photos.google.com/share/AF1QipMPxgE5pom-tw7TcetPIUb8PMExB911YboFW1NwrxnqijT064ws6Cf-QRyPYg7J3Q?key=YIRHek1Da2lmWk0tTUwxS3ppZzN5ZHktQy11OENn>

The truck in the video moves completely to the left lane of River Road, requiring all eastbound vehicles to stop as they are being blocked by the truck as it makes the turn onto Ridgefield Road. While there is a dedicated right turning lane on River Road to Ridgefield Road, given that the angle of the turn is less than 90 degrees, it is impossible for commercial delivery trucks the size of tractor trailers – or even school buses and vehicles of similar size – to make this turn from the turning lane without hitting the light or utility poles, overrunning onto the sidewalk or turning into the oncoming traffic. The additional traffic expected from the Regency redevelopment will almost certainly lead to gridlock, especially during construction, with the truck turning from River Road unable to proceed and the oncoming traffic from Ridgefield Road unable to back up the hill.

The absence of any traffic study pertaining to this obvious problem is a serious omission in the Regency Centers traffic study. Truck traffic engaged in construction will be a constant throughout the day for many months as this very large project is built. *This intersection needs to be redesigned and rebuilt before any construction can begin.*

How does Regency Centers plan to deal with this? Do they even have a plan for this?

TRAFFIC LIGHT AT THE NEW INTERSECTION OF THE REALIGNED WESTBARD AVENUE AND RIDGEFIELD ROAD

Regency's Traffic Signal Warrant Study and Operational Analysis (June 15, 2018) in the preliminary plan file concludes that a traffic signal will not be warranted at the intersection of Future Westbard Avenue and Ridgefield Road with the proposed reconfiguration of this intersection to a T intersection. Under the current configuration with a traffic signal at Ridgefield and Westbard, with River Road traffic entering the intersection, the situation is problematic at certain times. Of course, this situation is likely to be worse when Westwood I is fully redeveloped, even worse when Manor Care and Westwood II are redeveloped, and far worse when Bowlmor is redeveloped. Adding 34 townhouses at the Manor Care site to the existing 24 houses on this block, compounded by the average of 1,636 vehicles traveling on this block daily, will cause long backups as residents from that housing endeavor to exit without the relief of a traffic signal. What is essentially the removal of the traffic signal from the intersection of Westbard Avenue and Ridgefield Road is unacceptable.

WILLETT BRANCH AND GREENWAY

The naturalization of the Willett Branch and the Willett Branch Greenway are both important elements of the Westbard Sector Plan and among the recommendations of the Sector Plan. The preliminary plan needs to show dedications for the Willett Branch and the Greenway, in the area of Westwood II.

In view of the stream valley buffer requirements and Westbard Sector Plan, the new Westwood II building cannot be closer to the creek than the existing building. There should be a dedication of the property for the Willett Branch and Greenway as part of the resolution of the Preliminary Plan, with some form of allowance by the County for continued use of the area for parking until it is redeveloped.

PEDESTRIAN & BICYCLE ACCESS

Regency must be held accountable to meet the goals for pedestrian and bicycle access as specified on pages 10, 12, 33, 34 and elsewhere in the Westbard Sector Plan.

We urge the County to require Regency to revise and resubmit its plans that accommodate pedestrians and bicycles within the Westbard site and connecting to the neighborhoods, the Willett Branch SV Park, the Capital Crescent Trail and to bus stops, office and retail locations on the River Road corridor.

MANOR CARE

In view of the presence of vagrants in Manor Care last year and the close proximity of houses, Regency Centers should demolish Manor Care soon, but not use the land as a construction staging area.

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We appreciate your time and attention invested in the review and consideration of our concerns.

Sincerely,



Harold Pfohl, Chair
Citizens Coordinating Committee on Friendship Heights