



COALITION FOR SMARTER GROWTH

April 7, 2009

Chairman Royce Hanson
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

RE: Comments on the Gaithersburg West Plan, February 2009 Planning Board Draft

Dear Chairman Hanson & Board members:

Please accept these comments on behalf of the Coalition for Smarter Growth, a regional organization focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas.

The County's own Transportation Policy Report and ICC alternative studies have demonstrated the need to shift more jobs to eastern Montgomery and to provide more housing close to jobs in the I-270 corridor in order to reduce traffic congestion. Therefore, we disagree with the major increase in jobs proposed in the Gaithersburg West Plan, dramatically above planned levels. We are concerned that locating this amount of new development in this location will exacerbate the existing jobs/housing imbalance in the I-270 corridor, shifting yet more jobs to locations distant from more affordable housing. Degrading the job/housing balance will increase county traffic congestion, increase vehicle miles traveled (VMT), and increase air pollution emissions. The magnitude of this project will also undermine the market for development at existing Metro stations in Montgomery County. Public infrastructure costs to serve greatly expanded use in outlying areas also diverts public and private investment that could have been used to upgrade aging infrastructure in older areas. The scale of employment growth proposed for this location and the existing jobs/housing imbalance need more serious analysis. For such substantial changes to the existing planned levels of growth, we are surprised by the lack of detail in the plan.

The plan is being pitched as having benefits because of its density and mix of uses. While the plan provides some improvements to a conventional suburban layout of a sparse, poorly connected road network, the proposed new streets and intersections do not rise to the level of small block sizes (below 400 feet) needed to create high quality pedestrian environments.¹ The long blocks, limited intersections, prominence of high speed roads and new interchanges in the plan are likely to constraint the number of walk trips. The relatively remote location requires time consuming long distance transit connections to have regional accessibility. Given these factors, we believe an overwhelming majority of workers will drive to this location. Density and mix of uses alone do not achieve a smart growth result.

The location's distance from the regional center and Metrorail should be considered as important limits on how much employment growth is appropriate here. A site's regional accessibility is a far more important factor for reducing VMT generated by that site than on-site design and density features combined. Regional accessibility predicts about 20 percent of VMT for a development, versus 13 percent

for density, mix of uses and pedestrian-oriented design combined.ⁱⁱ Both the prospect of long-term high energy prices and the threat of climate change to Maryland and the nation demand we take a rigorous approach to the regional location of development.

We believe that the County and region are likely to benefit from adding the proposed millions of additional square feet of commercial space of a “Science City” to more regionally-accessible and closer-in locations such as Twinbrook and White Flint Metro stations, or eastside locations such as Silver Spring or College Park Metro station in Prince George’s County. The Metro station locations provide high capacity transit access and regional connectivity. Eastside TOD locations offer the additional benefit of reducing long-distance east to west commuting.

The proponents have argued that the alignment of the proposed Corridor Cities Transitway could be changed once again to provide access to this huge project. Yet, this would not resolve the regional accessibility problem. Transfers between Metro and CCT will take time and reduce ridership. The latest tortured route of the CCT will further degrade its effectiveness in taking mode share from cars. In the national financial crisis, funding for transit projects through an area with such spread out land uses will be an added challenge. The prospects for the CCT are too speculative at this time to be relied upon for approval of the scale and density of this project.

In summary, we believe that traffic, energy costs, climate change, and limits on infrastructure funds require the principles of smart growth to be rigorously applied. Also, these challenges compel us to recognize that regional location is the most significant factor to be considered in this case. We ask that the planning board consider the negative impacts of this tremendous increase in job growth in this I-270 location. The alternative of making this kind of employment growth a priority for Metro station sites and eastside locations would enhance the jobs/housing balance, reduce long distance travel (VMT), and increase job accessibility closer to the core and on the eastside of the county and region. We believe that a scenario that improves regional accessibility for jobs and housing will provide the most benefits overall to Montgomery County and the region’s residents.

Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director

Encl: Related Press Statement on the new Maryland Clean Energy Center

ⁱ See: Institute of Transportation Engineers, *Context Sensitive Solutions in Designing Major Urban Thoroughfares for Walkable Communities*. An ITE Proposed Recommended Practice. 2006.

ⁱⁱ Reid Ewing and Robert Cervero, “Travel and the Built Environment: a Synthesis” Transportation Research Board 1780. 2001:11.