

MONTGOMERY MALL CITIZENS ADVISORY PANEL

February 22, 2007

Ms. Melanie Moser
Montgomery County Planning Department
c/o Moser Consulting
501 West University Parkway, 2B
Baltimore, Maryland 21210

Ms. Moser:

The Montgomery Mall Citizens Advisory Panel (MMCAP) appreciates your meeting with us on February 1, 2007 to discuss our concerns about the proposed expansion at Westfield Shoppingtown Montgomery (Montgomery Mall). In that meeting, you and other staff asked us to summarize our concerns and to offer solutions. This letter serves that purpose.

We are not opposed to the size of the mall expansion. We consider the mall to be a community asset. However, we have serious concerns about the configuration of the proposed expansion and its failure to address multiple problems that it creates or exacerbates. We urge M-NCPPC to predicate its approval of Westfield's development plans on design changes and roadway improvements that we describe in this letter.

Concerns

Briefly, our concerns are as follows:

1. Westfield's decision to place the majority of new parking along Westlake Drive, and to shift its activity focus north towards Westlake Terrace, will substantially increase traffic on Westlake Drive, the ring road notwithstanding. Yet the expansion does not incorporate (and in some cases precludes) safety improvements to Westlake Drive. Westlake Drive has an acute pedestrian safety problem (4 pedestrian fatalities since 2000) and presents hazards for drivers as well.
2. The enormous 1500' long, 4-5 level parking structure proposed along Westlake Drive is visually incompatible with the communities bordering the mall property. Little new parking is proposed along I-270 where it would have much less impact.
3. The planned expansion will displace important local amenities. It will eliminate the locally needed Westlake Crossing shopping center and relocate the transit center as far as possible from residences, undermining policies supporting walkable, transit-friendly mixed-use development in this dense condominium area. Many seniors, disabled persons and low income residents live across Westlake Drive and depend on convenient shopping and transit.

4. The expansion will intensify existing security and noise problems, especially at night due to the proposed theaters and restaurants.

The area surrounding the mall features relatively dense residential housing, a transit center and a major office park, exactly the sort of "Smart Growth" community we want to foster in this corner of Montgomery County. It is imperative that we not abandon local retail, convenient transit and pedestrian amenities that make such communities viable. The expansion should increase, not decrease, the focus on mixed uses, street-facing retail, inviting streetscapes and walkability as featured in the new downtown Silver Spring, Washingtonian Center (Rio) and the proposed White Flint Crossing.

Westfield in fact appears to be dropping a corporate cookie-cutter "Hy-style" design model (hybrid traditional mall with "lifestyle" components such as restaurants and theaters) on its plot of land without consideration of context. Its plans vary only slightly from the paradigm of the suburban super-mall surrounded by acres of parking.

Recommendations

As Westfield's neighbors, we urge M-NCPPC to predicate its approval of Westfield's development application on the following changes:

1. Shift the majority of new parking away from Westlake Drive and towards I-270.

The size of the new parking garage along Westlake Drive must be reduced. This can be done in a number of ways, such as:

- Reducing the height of the proposed garage and significantly reducing its length or breaking it into smaller sections.
- Setting some garage levels below grade.
- Leaving the shops and parking along Westlake Drive largely "as-is".

To provide additional parking elsewhere, Westfield can:

- Increase parking near I-270 by replacing or augmenting the existing parking structures on that side.
- Add parking where the transit center is currently planned, while moving the transit center to Westlake Drive.
- Expand the surface lot by the lifestyle center on Westlake Terrace to two levels (one possibly underground).

2. Retain community shopping along Westlake Drive.

The Westlake Crossing shopping center is an important community resource that must be retained in some form along Westlake Drive, either as-is or integrated into the proposed parking structure. Lakeview House, a subsidized community for seniors and disabled persons of limited means, is located across the street and its residents patronize Westlake Crossing heavily, primarily on foot (or in wheelchairs). Forcing them to walk or travel further to shop deprives them of one of their lifelines. Magruders Discovery is another

subsidized community on Westlake Drive whose residents often walk or use transit. Many of the nearby condominium communities have become Naturally Occurring Retirement Communities (NORCs) whose residents may need to avoid long walks even if they drive to their shopping.

A forward-looking alternative is to integrate local shops into the proposed parking garage exterior, at the same time reducing the size of the garage. Under this solution recessed areas or gaps would be carved within the garage façade. The recesses would be lined with shops and filled with park-like courtyards or surface parking. This would allow the mall perimeter to feature "urban" concepts such as wide sidewalks, outdoor seating, aesthetic landscaping and store clusters facing the street (with outdoor dining). These changes would complement traffic calming to make Westlake Drive into an inviting community street.

3. Move the transit center closer to the community, not further away.

Many residents living near the mall depend on bus service, and for many of them walking distance is a critical factor due to age or disability. Many buses stop at the transit center but not along Westlake Drive. The current plan is to move the transit center to the furthest possible point from any local community access. It should be relocated to the corner of Westlake Drive and Westlake Crossing (integrated into parking as practical). It appears that the rail line proposed to connect to the transit center near I-270 is unlikely to be built for a very long time.

4. Make Westlake Drive a safe, inviting, pedestrian-friendly street.

High car speeds and roadway design flaws made Westlake Drive a pedestrian-hostile street, deterring walking and resulting in terribly high pedestrian fatality rates. Approximately 4% of all pedestrian fatalities in the entire county since 2000 have occurred on Westlake Drive. Failing to address this crisis while drawing yet more traffic is unacceptable. Westlake Drive must be made safe for pedestrians, cyclists and drivers. The road must be re-engineered to become an inviting component of the community rather than just a mall access road and barrier to pedestrians. It must become a different kind of street.

Therefore we recommend that approval of the mall expansion be contingent on the following changes to Westlake Drive:

- Implement traffic calming to slow car traffic without limiting capacity. Install raised crosswalks and raised red-brick speed tables (large elevated, flat-topped sections of roadway). This has been done successfully elsewhere in the county. Require a study to identify other possible calming techniques such as a roundabout at Lakeview Drive.
- Tighten the radius of the right turn from westbound Democracy Boulevard onto northbound Westlake Drive, to slow turning drivers.

- Provide a landscaped median as a refuge for pedestrians, so they can walk half-way across the street and wait safely before proceeding. Eliminate the continuous two-way left turn lane in favor of short left turn lanes at necessary locations. Provide at least a narrow (5') median next to the left turn lane at unsignalized intersections. Consider additional signals (possibly pedestrian-activated) at key crossing points.
- Move sidewalks 4' from the roadway curb (rather than the proposed 0' to 2'), to make them safer and less forbidding. Widen the west-side sidewalk to 6' (from 5') due to the frequency of disabled and wheelchair users. Widen the east-side sidewalk to 8'-10' as currently proposed.

5. Change the Cross Section of Westlake Drive.

The Westlake Drive cross-section must be expanded to allow room for pedestrian improvements and to widen the extremely narrow lanes to a modest 11'. This must be done before the mall generates additional traffic. Currently the lanes on Westlake Drive average less than 9' 8" in width in places, with the center lane often set at 9' wide. As a result, left-turning drivers often fail to maneuver completely within the center lane, wide vehicles have difficulty staying in their lane, drivers passing trucks or buses swing too wide, potholes that regularly form near the roadway edge cannot be avoided, and cars waiting to turn left onto Westlake Terrace risk being hit by oncoming turning traffic, especially buses, coming from the right. Essentially five lanes have been squeezed into the space of four, creating these hazards.

Westlake Drive also fails to serve road cyclists, despite its designation in the Master Plan as a dual bikeway (meaning both on-road bike space and a shared use path).

Our solution stipulates the following changes, which together require Westfield to dedicate only 6' of additional right-of-way (10' wherever a median and left turn lane are both provided):

- Widen the existing lanes to a safe 11' (10' for left turn lanes next to the median).
- Add 3' shoulders which would serve the quadruple purpose of supporting road cyclists, allowing wide or turning vehicles a "slop" area, creating extra separation between drivers and pedestrians, and allowing drivers to avoid (and avoid creating) potholes near the roadway edge. This is preferred over simple 14' wide outside lanes. (The 3' shoulder dimension does not include gutter, which should be 1' wide).
- Provide a 5' - 15' wide landscaped median. It would narrow to 5' wide next to left turn lanes (the median is not strictly necessary approaching signalized intersections).
- Provide a 6' east-side sidewalk and an 8' west-side path, each located 4' from the curb as described previously.
- The west-side curb can stay where it is, reducing cost.
- Where Westlake Drive becomes four lanes near Democracy Boulevard, provide 11' lanes with no median, 3' shoulders, 1' gutters, 4' landscape panels and the 6'/8'

sidewalk configuration recommended above. This requires no more right-of-way than Westfield's plans at that location.

- At the intersection of Westlake Drive and Westlake Terrace, provide an additional lane on northbound Westlake Drive reserved for traffic turning right onto Westlake Terrace.
- Note that the covenants of record on Westfield's property require Westfield to provide additional right-of-way along part of Westlake Drive upon request by M-NCPPC or the Planning Board.

6. Modify the existing I-270 South/Democracy Boulevard ramp to provide a direct exit onto the mall's ring road.

Westfield and the State must coordinate to provide a direct connection between the existing I-270/Democracy Boulevard (SB to WB) exit ramp and the mall ring road. This would:

1. Encourage traffic headed for the busy north side of the mall to use the ring road rather than Westlake Drive.
2. Facilitate the expansion and use of mall parking next to I-270 rather than along Westlake Drive.
3. Reduce traffic entering the difficult crossover on Democracy Boulevard in front of the mall. This would also reduce the number of people who enter the mall via Westlake Drive in order to avoid crossover difficulties.

Only an exit ramp, not an on-ramp, is required.

We also urge you to recommend that the State sign the existing I-270 HOV exit onto Westlake Terrace as a route into the mall. But Westfield's plans to encourage widespread use of the HOV exit are not realistic because the exit is not available to solo drivers during rush hour and it is awkward to find and use. To use the exit, southbound drivers on I-270 must move into the HOV lane (left lane) almost two miles beforehand. The exit is also unavailable to drivers entering I-270 at Montrose Road.

7. Address mall-related security and noise issues affecting the community.

Westfield must assist in reducing incidents of loitering, drug use, vandalism and more serious crimes in the surrounding neighborhoods committed by people before or after they visit the mall. These problems are sure to increase as the mall expands and adds night-time attractions that draw a younger clientele (theaters, restaurants). Crime reduction can be accomplished through funding of additional police resources per county policy and other security measures, such as cameras, lighting and signs on the mall property and in adjacent communities

We would like to review the mall's security plan documenting the number of personnel who will patrol parking and driving areas around the mall relative to current levels. We expect

garage areas to be well-patrolled and well-lit. Speed bumps and enforcement must be applied in garages to curtail speeding.

8. Other Recommendations.

We ask that your department require the mall traffic study to additionally examine the impact of Westfield's expansion on the intersection of Tuckerman Lane and Old Georgetown Road.

We recommend construction of a sidewalk on the east side of Westlake Drive all the way to Tuckerman Lane in relation to this project, and construction of sidewalks along Tuckerman Lane from Seven Locks Road to Old Georgetown Road.

We look forward to working with the Planning Department, the Department of Public Works and Transportation, the County Council, the State Highway Administration, and with Westfield to make the mall the star of the county, nestled within our communities, not overlooking them, and drawing people from near as well as far by its ease of access and amenities.

We can be contacted for further information, and to offer further assistance, via Jack Cochrane at 301-503-9931, Paula Bienenfeld at 301-984-2944 or Alan Ehrlich at 301-257-7513.

Sincerely,

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cc: Mr. Michael Ma
Mr. Ed Axler
Mr. Chuck Kines