

Comments on Bethesda Purple Line Station Minor Master Plan Amendment: Staff Draft

Submitted by:
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We appreciate the opportunity to provide comments on the proposed Bethesda Purple Line Station Minor Master Plan Amendment. This proposal will substantially impact many of our Town's residents by dramatically altering a key block in downtown Bethesda directly adjacent to our Town. It also will directly impact Elm Street Park and the Capital Crescent Trail, two outdoor public amenities that Town residents both use and enjoy on a regular basis.

The proposal focuses on two key elements: 1) the redevelopment of the Apex site with a new building that better integrates the proposed Purple Line and Red Line stations, and 2) a new tunnel under Wisconsin Avenue to handle bike and pedestrian traffic on the Capital Crescent Trail (CCT). While recognizing that both of these elements have some attractive characteristics, the proposed minor master plan amendment highlights several of the fundamental flaws in the Maryland Transit Administration's (MTA) existing plans for the Purple Line and tries to remedy these problems at a very late date and at a very high cost. In particular, the proposed redevelopment of the Apex site highlights the high costs of fixing the "square peg in a round hole" problem of the current suboptimal plan for the western terminus of the proposed Purple Line. The proposed second tunnel under Wisconsin Avenue acknowledges the failed promise of putting the CCT through the existing tunnel and the inadequate and unsafe surface route option that remains under the current Purple Line plan.

I. Redeveloping the Apex Site

Faced with skyrocketing costs, the MTA has put forward an inadequate plan that requires shoe-horning both the Purple Line and Red Line stations into the highly constrained Apex building. Through the proposed minor master plan amendment, the County seeks to remedy this problem by allowing additional height and density at the Apex site as an incentive for the developer to construct a new building that better accommodates both stations.

1. The proposed master plan amendment should be made conditional on full funding and planned construction for the Purple Line.

This approach was taken in the recent Chevy Chase Lake master plan and is even more appropriate in this case. The one and only reason for this minor master plan amendment is to accommodate the complexities of a multi-modal transit station on

this site. If the Purple Line is not built or is substantially delayed, the entire rationale for the proposed minor amendment to the master plan disappears. With the County about to begin the process of developing a new master plan for the Bethesda CBD, this would be the appropriate time and place to decide on future plans for this critical block. Thus, the minor master plan amendment should be made contingent on funding and planned construction of the Purple Line, and if that fails to materialize, then future plans for the block should be addressed in the context of the new master plan for the entire Bethesda CBD.

2. Under the Commercial Residential (CR) zone optional method proposed in the plan, there is no assurance that any new development on the Apex site will be required to accommodate the Purple Line and Red Line stations.

By shifting the zoning from the traditional CBD zone to a CR zone, the developer would be putting forward a proposal that would be governed by the requirements contained in the recently adopted CR zone amendment. Under these requirements, the developer earns additional density by providing public benefits *it* selects from among seven categories contained in the zoning ordinance. If these benefits total 100 points, additional density is earned. The Planning Board has limited ability to require specific public benefits and the role of community input is also substantially diminished. Thus, we are concerned that under the current CR requirements, there is no guarantee that all or even some of the design features identified in the minor master plan amendment will be provided by the developer who may elect to achieve the density bonus through other features. The County needs to take additional steps to ensure that if the minor master plan amendment is adopted and redevelopment of the Apex building occurs, that the new development includes the full list of desired features contained in the proposed amendment.

3. The Minor Master Plan Amendment should have more adequate safeguards to protect the little remaining open space left in downtown Bethesda.

Only a few years ago, the Planning Board responded to a public outcry and required the developer of what was then called Woodmont East to create a plaza with a substantial amount of open space in front of the Landmark Theaters – the only remaining open space in the downtown Bethesda area. The proposed minor master plan amendment would likely result in the redesign of this site and the elimination of this open space. It envisions that the new Apex building developer will transfer development density to adjacent areas including the Woodmont East site with the likely outcome that the amount of open space on this site will be reduced from what was required in earlier project approvals. The minor master plan amendment should specify that adequate open space in front of the Landmark theaters should remain a priority.

II. Second Tunnel for Bikers and Pedestrians

The MTA had committed to including an elevated passageway for the CCT for bikers and pedestrians as part of its Purple Line plan. Ignoring repeated warnings by the Town prior to the DEIS review period that such a proposal was fraught with problems, this passageway remained in the plan until the County Council voted it down after MTA acknowledged the excessive expense that would be required to reinforce the supports for the Apex building in order to accommodate the trail over the trains through the tunnel. At that time, MTA also acknowledged that the existing tunnel under Wisconsin Avenue was not sufficiently deep to provide the trail over the trains, even if the Apex building reinforcements were financially feasible. Without the CCT trail going through the existing tunnel, all that remained for bikers and pedestrians was the surface route crossing busy Wisconsin Avenue. After public outcry, the MTA recently proposed a limited-width, pedestrian-only walkway through the existing tunnel to complement the surface route crossing Wisconsin Avenue for bikers and other trail users.

1. The second tunnel should be a mandatory, core element of the Purple Line plan and not linked in any way to redevelopment of the Apex site.

By relying on bicyclists to cross Wisconsin Avenue using the surface route, the existing plan creates a safety nightmare. The crossing at Willow Lane is already one of the most dangerous intersections in the County. The route also turns onto 47th Street creating further hazards from turning cars and pedestrians going to and from Elm Street Park. Finally, the route goes down heavily-traveled Bethesda Avenue and crosses Woodmont Avenue – perhaps the most bike-unfriendly stretch imaginable. Add in hundreds (thousands on weekends) of bikers and other trail users, and the situation becomes untenable and dangerous. Despite the high costs of the proposed second tunnel (estimated to be \$15-30 million), this should be a critical required element if the Purple Line becomes a reality. It should be included in the MTA and County plans regardless of whether the Apex building is redeveloped. The County should be required to commit the necessary resources to build the second tunnel before any approvals are given for redeveloping the Apex site with increased density.

2. Neither of the two proposed tunnel design options seems optimal.

The first option suffers from an unacceptable 8 percent grade as it exits onto Elm Street. The second option avoids this problem, but appears to take additional land from Elm Street Park because it has separate spurs for the tunnel portal and the surface route. We would prefer an option that maintains grade changes to 5 percent, but which also minimizes the amount of land taken from Elm Street Park.

We hope these comments are useful as the Planning Board considers the proposed Bethesda Minor Master Plan Amendment, and we look forward to continuing to work with the Board and staff in addressing these issues.