



COALITION FOR SMARTER GROWTH

November 18, 2010

Françoise Carrier
Chair, Montgomery County Planning Board
The Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, MD 20910
via MCP-Chair@mncppc-mc.org

RE: SUPPORT for Project Plan Review No. 920070080, Falkland Chase; and Preliminary Plan 120070560, Falkland North (a.k.a. Falkland Chase)

Dear Chair Carrier:

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

We have weighed the concerns expressed by a variety of residents and groups regarding the best course for the Falkland North site. The decision regarding the historic designation of the south and west parcels, and the redevelopment of the existing buildings and grounds of the north parcel will continue to be one of earnest disagreement among some stakeholders. Opponents of redevelopment of the north parcel point to the distinctive social and architectural history of the site and the loss of numerous mature native trees. We acknowledge that these are indeed significant losses. However, we believe that the benefits of the proposed project for Falkland Chase North outweigh these losses, along with the preservation of the historic south and west parcels. After careful review of plans, reports, a brief site visit, and comments from opponents and proponents, we believe that this project has many local, county and regional benefits.

At a global scale, this project is also an important contributor to growing in a sustainable and climate-friendly way. Our recent research published in [Cool Communities](#) compared the CO2 emissions from a project similar to this, with one that is much less accessible to a Metro station and the region's core. Our analysis shows that compact, close-in, Metro and high frequency bus-accessible developments yield CO2 emissions savings of 10 – 35 percent due to reduced driving. The addition of over 1,000 housing units a few hundred feet away from the Silver Spring transit center, Purple Line/trail and Central Business District offers tremendous savings in vehicle miles traveled, vehicle trips and greenhouse gas emissions.

We wish to acknowledge some of the impressive features of the project:

Stormwater management and water quality improvement: The water quality measures are outstanding. These measures promise to substantially improve the water quality of the site that currently has no stormwater management controls. It would be helpful to document the net improvement in water quality from existing conditions with the extensive Environmental Site Design (ESD) techniques that the

project proposes. Also instructive would be to know the costs of the ESD approach and how it compares to conventional measures. We are impressed by the restoration of the deeply incised stream on the south parcel and enhanced public access. The use of rain barrels for the off-site parcels is also commendable. The project should be applauded for its stormwater management measures as a major step forward for implementation of new approaches and new regulations for stormwater management. The transferability to future developments in similarly valuable urban sites is an interesting question as many infill projects will not have a 9 acre site. Also, we commend the LEED Silver or better commitment for the buildings.

Affordable housing: Due to the scale of the project, a large number of long-term affordable housing units will be added to the site. With 156 MPDUs constructed and sustained for 99 years, we see this as a major benefit and an important example of the success of the county's landmark MPDU program. We also commend the "workforce" housing affordable to higher income households as an added benefit.

While overall we commend the substantial number of below market "workforce," MPDUs, and off-site very low income dedicated Woodleaf housing units, we ask that on-site preservation of very low income housing units be considered again. The Woodleaf location is far from this site, Metro and a Central Business District. While we applaud the affordable housing program offered by the developer, we still would prefer preservation of the expiring very low income units currently on-site be accomplished in the south and west historic buildings.

From a countywide and regional perspective, we want to highlight the importance of providing such a substantial number of units provided at this site. Montgomery County is a costly place to live, and job growth is outpacing housing supply. This large number of transit-accessible housing contributes to meeting the housing needs of a growing workforce.

We are struck by the number of three-bedroom apartments in the plan. This is highly unusual. We see that a portion of MPDUs will be three-bedroom units. This is very helpful to moderate income families with children who have difficulty finding suitable housing, especially near transit, jobs and amenities. We do wonder about what the likely level of occupancy will be for the market-rate three-bedroom units. We would be interested in monitoring the occupancy of these units and comparing them to the occupancy of two-bedroom units to assess if market-rate three-bedroom apartments in this location house more people than a similar amount in two-bedroom apartments.

We have one MPDU question – why are 12.5 percent MPDUs provided rather than the full 15 percent?

Public green space: We commend the project for designing a "public garden" that works with an adjacent commercial use, thus animating and framing this street-fronting public green space. We look forward to seeing the details on this to ensure it achieves the right balance of active rather than passive space for such an urban location. The public access for the restored stream on the south parcel is also a public open space benefit. While the north parcel will radically change from its current garden apartment form with large trees and lawn, we think that these new more active and more public spaces will uniquely enhance the downtown Silver Spring living experience, especially for surrounding neighbors.

Urban design/Building massing: We commend the building massing concepts shown in plans. The project is dramatically improved from earlier proposals. We believe that the graduated heights which place the tall buildings along the railroad tracks and the lower buildings closer to East-West Highway respond well to the context. We like the variety of buildings and their massing on the site. We appreciate that the massing defines the public realm of the streets and sidewalks, while creating a varied set of buildings and courtyards on the site.

In addition to expressing our support for the project, we wish also to suggest some ways it could be improved.

Parking: Our main complaint about this project is the relatively high parking ratios for this location. Given the site's proximity to transit, the CBD and an on-site grocery store, we ask that the Board reconsider the parking ratio for the housing units in particular. We understand that the parking district fees interfere with parking reductions – we ask the Board to examine this problem for a better resolution. We are aware of many problems with the parking districts and hope that they will be restructured soon. The large number of parking spaces will necessarily generate vehicle trips that could have been avoided with lower car ownership rates. The parking ratio degrades the benefit of the project's accessibility. Also, the cost of providing the parking is also money that could have been spent to subsidize affordable housing on site, to house families rather than cars. We also look forward to the creation of a robust Transportation Demand Management plan which addresses both residential and commercial activities. Reduced parking and several publicly-accessible carsharing vehicles on site should be pursued. We ask that all parking be charged separately from leases or use of residential or commercial space and that charges reflect the full cost so non-parking users do not subsidize parking users.

Street design: For the central S road, we suggest its design and materials provide a very low speed, possibly shared street design for vehicles, pedestrians and bicycles. We support the recommendation that improved pedestrian crossings for the intersection of 16th Street and East-West Highway be part of the plan. Additionally, pedestrian crossings for the new signalized intersection should also be enhanced. Enhancing bicycle access in the area should also receive more attention.

Deconstruction: The environmental impacts of disposing of the several buildings in landfills are not insignificant. We suggest deconstruction and reuse of materials to the maximum extent possible. Deconstruction and reuse would further improve the high level of environmental performance for this project.

Overall, we believe that the Falkland Chase project offers important housing, environmental, and transportation benefits at the local, county and regional levels. We also applaud its contribution to climate-friendly development. We look forward to monitoring this project through detailed project review, construction and operation of this innovative development.

Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director