

Evaluation of Towne Crest Apartments Redevelopment Proposal
by the Washington Grove Planning Commission
March 26, 2012

The Washington Grove Planning Commission has reviewed the proposal for rezoning and redeveloping the Towne Crest Apartments with a proposed designation of PD-60 (Planned Development, 60 units per acre) and expansion from 107 to 469 rental units. The Commission has reviewed applicable portions of the Montgomery County Code (Chapter 59 – Zoning Ordinance, Chapter 22A – Forest Conservation), the current master plan for the Towne Crest property (Gaithersburg Vicinity Master Plan, Airpark Study Area), and Growth Policy and Transportation Review Guidelines. The Planning Commission makes the following conclusions regarding the aforementioned proposal:

1. The proposed redevelopment is not consistent with the planned development purpose clause in the County Zoning Ordinance.

- The proposed redevelopment will not produce a balanced and coordinated mixture of residential and convenience commercial uses -- there are no commercial services available on or near the Towne Crest property.
- The proposed redevelopment reduces the open space on the Towne Crest property and reduces the available green spaces for relaxation, recreation, and social activity.
- The proposed redevelopment does not change the location of the property with respect to existing and planned commercial and employment uses -- the overwhelming majority of trips from Towne Crest to commercial and employment areas will be by automobile.
- The proposed redevelopment is not compatible with existing neighboring areas and land uses.

2. The proposed density (60 units per acre) and proposed building sizes (3, 4, and 5-story) are not consistent with compatibility requirements specified in the County Zoning Ordinance.

- Adjacent single-family residential areas are zoned and developed with 6 units per acre.
- Adjacent multi-family residential areas are zoned and developed with 12.5 units per acre.
- All neighboring residential areas are developed with 2-story residential structures, therefore proposed building heights are not compatible with neighboring residential areas.
- The area master plan for the adjoining residential area within the Town of Washington Grove specifies single-family residential, therefore proposed Towne Crest buildings would violate the required compatibility separation of 100 feet from the Town residential area.

3. The proposed redevelopment is not consistent with the Master Plan for the Towne Crest property.

- The Gaithersburg Vicinity Master Plan (Airport Study Area) specifies multi-family use for the Towne Crest property with a zoning designation of R-30/RT-12.5 – extremely different from the PD-60 zoning proposed with the application for rezoning and redevelopment.
- There has been no public process to modify this portion of the applicable Master Plan.
- Residential properties adjacent to Towne Crest in the City of Gaithersburg to the north are zoned and master planned as R-6, 6 units/acre.
- Residential properties adjacent to Towne Crest within the Town of Washington Grove are zoned and master planned as RR-2, minimum lot size 7,500 sq.ft.-- approximately 6 units/acre.

- The largest property adjacent to Towne Crest is the West Woods within the Town of Washington Grove, master planned by the Town as FR (Forest and Recreation), and threatened by storm water runoff (that would result in tree damage and erosion), and increased dumping of large household items and litter from the higher density proposed in the Towne Crest development.

4. The proposed redevelopment cannot be justified by proximity to transit.

- The Towne Crest property is located within the Montgomery Village/Airpark Policy Area, not one of the 10 policy areas in the County designated “Metro station policy areas” – communities generally within a half-mile radius of a Metro station.
- The Towne Crest property is 3 miles by automobile or 18 minutes by bus from the Shady Grove Metro Station; therefore Towne Crest is not qualified as transit-oriented development.
- Proximity to Washington Grove MARC Station (0.6 miles) does not qualify as transit-oriented development.
- Proposed developments at the Shady Grove Metro Station have significantly lower densities than the PD 60 zone proposed for Towne Crest -- the most dense residential area closest to the Metro Station is proposed to be 34 units per acre, and housing further away on Crabbs Branch Way is planned for an average density of 7-8 units per acre.
- Applicable growth policy and transportation review guidelines for the Towne Crest property are “Suburban”, not “Urban”, and do not support the proposed redevelopment as a transit-oriented development.

5. The proposed redevelopment is not compatible with the adjacent significant historic resource that is the Town of Washington Grove.

- The Town as a whole, rather than its individual historic properties, is listed on the National Register of Historic Places and is known as “the town within a forest.” The unique sense of place for which the Town is recognized arises from a blend of its unique rural setting, its historic legacy, and community life. That fabric becomes more vulnerable when juxtaposed to starkly incompatible land use like the redevelopment proposed for Towne Crest.
- The unit density, height, lot coverage density, and almost all the features of the proposal are incompatible with the forested setting, low density, low profile structures, and nearby quiet presence of the historic resource.

6. The proposed redevelopment is too close to the Washington Grove West Woods and will cause the loss of a significant number of trees.

- The Forest Conservation Plan identifies a total of 72 significant/specimen trees; 13 on Towne Crest property and 59 in the Washington Grove West Woods.
- The proposed development would result in critical root zone impacts and the loss of more than 20 of these trees.
- Other trees in the Washington Grove West Woods would suffer irreparable harm.
- Proposed afforestation is not adequate; street trees (20 years hence) over public property cannot meet requirements of the Montgomery County Forest Conservation Law.

7. The proposed redevelopment will exacerbate existing transportation problems in the vicinity of Towne Crest related to speed, safety of pedestrians and vehicles as well as signage and efficient movement of traffic.

- Washington Grove Lane/East Diamond Ave/Railroad Street Intersection – there are currently significant backups along East Diamond Ave during morning rush hour.
- Washington Grove Lane Traffic Calming – existing speed humps reduce traffic speeds and have increased safety, but general vehicular speed and access by low-clearance vehicles remain issues that will increase with additional traffic and must be resolved.
- Washington Grove Lane is sign posted for 30 mph, unsafe for speed humps or speed tables and should be resigned for a lower speed.
- Washington Grove Lane Sidewalk – existing sub-standard asphalt path is a County maintenance responsibility; replacement with improved sidewalk and drainage is needed.
- Washington Grove Lane/Maple Lake Road Pedestrian Crossing – existing crosswalk needs effective signage and/or warning light for safety.

8. The proposed redevelopment does not provide adequate off-street parking, and proposed access roads adjacent to the Washington Grove West Woods will exacerbate negative impacts on the Town of Washington Grove.

- For proposed Towne Crest Buildings C and D, a total of 115 parking spaces are required by County formula, but only 53 parking spaces are provided adjacent to these buildings with no immediate interior parking available. Remaining off-street parking capacity is in parking structures in distant buildings; therefore Towne Crest resident parking will overcrowd public streets, reducing safety and access.
- The proposed proximity of the access roads and surface parking along the border with the Washington Grove West Woods will increase damage to the Woods caused by dumping of household and noxious vehicle-related trash.

9. The proposed redevelopment should address the Towne Crest Storm Water impacts on Washington Grove's West Woods.

- Towne Crest developer representatives have acknowledged a legacy responsibility to address the existing and foreseen Towne Crest Storm Water harmful impacts on the West Woods; a funding mechanism needs to be identified for Towne Crest developer contribution to remedial actions in the West Woods.
- A significant number of trees in the Town's West Woods have been lost due to severe erosion caused by County-approved storm water outfalls from the larger (current) Towne Crest community.
- Recent County modifications to fencing and added riprap for the largest storm water outfall from Towne Crest have improved, but not stopped, the flow of trash and the erosion into the West Woods.
- Proposed on-site storm water bio-treatment does not include holding capacity; real-time outflow from proposed Towne Crest Apartments will continue to cause erosion in West Woods.
- Both storm water outfalls from Towne Crest need corrective action; a proposal to split the largest outfall into two separated and lower outfalls may somewhat reduce initial outfall velocity, but will not reduce the concentrated flow and downstream erosion in the West Woods.

10. The proposed redevelopment should assist with pedestrian access impacts on the West Woods.

- The chain link fence along the Towne Crest/West Woods border gets cut frequently from the Towne Crest side, and the resulting uncontrolled access and associated trash (including the dumping of car oil) have made maintenance of the West Woods an ongoing challenge and burden for the Town.
- The West Woods are for public use and enjoyment, and more effective channeling of the pedestrian traffic will improve maintenance and protect the character of the West Woods.
- Nearby installations of fences near Fairhaven Drive, and also along the Towne Crest property border with the Saybrooke community, have demonstrated effective pedestrian traffic control.
- A new fence is needed (with design to be approved by the Town) along the entire border of the Towne Crest property with the West Woods to ensure access to the West Woods via existing maintained foot paths connecting Washington Grove Lane and Kelley Park.

11. The proposed redevelopment should protect birds and West Woods habitat from negative impacts of exterior lighting.

- The West Woods is a unique asset providing important greenspace benefiting the region with a diversity of birds and woodland species.
- Towne Crest exterior lighting adjacent to the Town boundary should be designed to eliminate glare and uplighting, and ensure no light trespasses into the West Woods.
- Recent studies have documented the potential disruption of migrating birds unless lighting design and installation direct exterior lighting to only where needed.