



February 23, 2023

The Montgomery County Group of the Maryland Sierra Club Chapter asks that the Planning Board reject Preliminary Plan no. 120220130 and Site Plan no. 820220180 (Preston Place) because it fails to conform to the Chevy Chase Lake Sector Plan.

The Sierra Club strongly supports smart growth, transit oriented, pedestrian-friendly development and environmental protection. The Chevy Chase Lake Sector Plan approved by the County Council in 2013 has clear language that requires that the tree canopy be restored and protected and that overhead utilities be relocated underground when redevelopment occurs¹. The staff report is misinformed in stating that burying the utilities along Manor Road would harm existing mature trees. The single-phase Pepco feeder line along this stretch could be buried underneath the roadway pavement, thus avoiding harm to the few mature street trees that will remain. This is the best plan for the long-term health of the tree canopy and will allow for the planting of large overstory trees along Manor Rd. Large trees will provide the most environmental benefits to shade and cool the area and to soak up stormwater.

The project includes a modest increase in density (net increase of 14 dwelling units). The Sector Plan did not contemplate a change in use, zoning or density for these parcels. The project involves the gentrification of 1, 2 and 3 bedroom naturally occurring affordable rental apartments into 3 bedroom luxury townhomes with 15% smaller units as MPDU. As such there is no overriding smart growth value that would justify waiving important environmental provisions of the Sector Plan.

As evidence that electric lines can be buried under roadway pavement without harming trees, look no further than the nearby Pepco's Sligo to Linden undergrounding project which buried much higher capacity lines under narrower roads. This project (DPS permits no. 365021 and 365022) began in 2019 and included the burial of three regional 69,000 volt subtransmission lines between Pepco substations. The lines were buried under County roads such as Seminary Rd, Linden Lane, Fraser Ave, Hale Pl, Birch Dr, and Montgomery St.

Waiving the requirement to protect the tree canopy by burying Pepco's wires along Manor Rd would create an unfortunate precedent that future applicants are certain to cite when properties west of Connecticut redevelop.

We also wish to express disappointment that the applicant proposes to serve this development with natural gas infrastructure, presumably for gas hot water, gas cooking and gas space heating. This represents a missed opportunity to electrify and use efficient heat pumps for heating and hot water as a more environmentally friendly option to minimize climate impact. The current Preston Place rental townhomes use electric stoves, so gas cooking would be a step backward from the status quo.

Please reject this proposal and instruct the applicant and staff to come back with amended plans that include burial of the Pepco feeder line that conflicts with the longterm health of tree canopy.

Sincerely,

Darian Unger, Chair
Sierra Club Montgomery County Group
dwunger@howard.edu

Al Carr, Executive Committee Member
Sierra Club Montgomery County Group
alfred.carr@gmail.com

cc: Montgomery County Council

[1 Approved and adopted \(2013\) Chevy Chase Lake Sector Plan](#)

Summary of Recommendations

Environment (p22)

Preserve and restore environmental features while minimizing the impact of future development.

- Restore the Coquelin Run stream valley by promoting stream and forest restoration and creating a conservation easement.
- Expand the existing tree canopy.
- Promote sustainable site and building design to mitigate negative environmental impacts.
- Accommodate future transit options, including the Purple Line.

Access

Pedestrian and Bicycle (p41)

Today, Connecticut Avenue divides the Center as two separate places. The supermarket and shops of the Chevy Chase Lake shopping center on the east side of the avenue are isolated from the coffee shop, eateries, and other businesses on the west side. While it is possible to cross Connecticut Avenue on foot, few people do.

For the Center to be successful, pedestrians must have a distinct and welcoming experience. Especially for those blocks between Chevy Chase Lake Drive and Manor Road, Connecticut Avenue must be transformed from what is primarily a through-way, dedicated to moving vehicles through Chevy Chase Lake, to a pedestrian-oriented avenue that invites people to stay, making the Center a whole place and more inviting to pedestrians and cyclists. The Design Guidelines provide further details on this topic.

The Plan recommends knitting the two sides of the Center together, across Connecticut Avenue, by:

- Enhancing existing street crossings with sidewalk, crosswalk, and median improvements.
- Providing a new signalized crosswalk at the Connecticut Avenue/Laird Place intersection.
- Allowing on-street parallel parking during off-peak hours along Connecticut Avenue, between Manor Road and Chevy Chase Lake Drive.
- Installing a distinctive and human-scaled streetscape, including sidewalk paving, streetlights, street trees, integrated stormwater management, and placing all utilities underground.

Environment (p49)

This section includes recommendations to maintain and improve the quality of the natural environment in Chevy Chase Lake.

The Sector Plan recommends that any further development achieve the following objectives:

- Protect the Coquelin Run stream valley network and its associated forested slopes (not including the area of the Coquelin Parkway) through a Category I Conservation Easement.
- Reduce direct stormwater discharge into Coquelin Run.
- Support stream and forest restoration projects to stabilize banks, remove invasive species, restore native forest structure, and prevent further stream erosion.

- Enhance Coquelin Parkway as a public right-of-way that accommodates only bicycle and pedestrian use.

Additionally, the expansive tree cover in Chevy Chase Lake—50 percent of the Plan Area—is an important part of the community's character, as well as its ecological health. One of the goals of the Plan is to maximize tree cover for new development with overall goals of 25 to 30 percent tree canopy cover in the Chevy Chase Lake Center area. New development should also retain or improve canopy cover throughout the Plan Area, within street medians, along new and existing streets, and in surface parking areas.

The likely removal of many existing, mature trees along the Capital Crescent Trail during the construction of the Purple Line reinforces the need to plant new ones. To expand the tree canopy in Chevy Chase Lake, they must be planted in association with new development or redevelopment projects.

Email message from MCDOT Director regarding burial of electric lines under roadways

From: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>
Date: Wed, Feb 15, 2023 at 11:27 AM
Subject: RE: Question about Pepco's sligo to linden undergrounding project
To: Al Carr <alfred.carr@gmail.com>
Cc: Sabbakhan, Rabbiah <Rabbiah.Sabbakhan@montgomerycountymd.gov>

The preference is for the utilities to be located in a utility easement adjacent to the County ROW. The main reason for this is to avoid the disruption and expense associated with utility repairs under the road itself. In many locations, it is not feasible to locate the utility infrastructure outside the ROW. When this happens, sidewalk is preferred so that they can be accessed more easily. **If sidewalk isn't feasible, then in the road is possible.**

Christopher Conklin, Director
Montgomery County Department of Transportation

From: Al Carr <alfred.carr@gmail.com>
Sent: Wednesday, February 15, 2023 11:24 AM
To: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>
Cc: Sabbakhan, Rabbiah <Rabbiah.Sabbakhan@montgomerycountymd.gov>
Subject: Re: Question about Pepco's sligo to linden undergrounding project

[EXTERNAL EMAIL]

Thanks.

Does MCDOT have any issue with electric lines being buried under roadways?

The Complete Streets Design Guide references a 2016 document which states that MCDOT prefers that "dry utilities" be buried under the sidewalk.

But Pepco buried the sligo to linden lines under the roadway pavement, so did they have to get a waiver?

One of the benefits of burying electric lines under the roadway pavement seems to be that it reduces conflicts with tree roots. I believe this is also the practice in DC for Pepco's large scale project to bury lines there.

Al

On Wed, Feb 15, 2023 at 11:09 AM Conklin, Christopher
<Christopher.Conklin@montgomerycountymd.gov> wrote:

Al,

There would not have been Mandatory Referral for utility reconstruction. The permits would have been managed by DPS for County right of way and MDOT/SHA for work on State right of way. I've copied the new DPS Director Rabbiah Sabbakhan in case he can provide more information about the permitting of this type of utility reconstruction in County right of way.

Christopher Conklin, Director
Montgomery County Department of Transportation
240-777-7198

From: Al Carr <alfred.carr@gmail.com>
Sent: Wednesday, February 15, 2023 11:02 AM
To: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>
Subject: Question about Pepco's sligo to linden undergrounding project

[EXTERNAL EMAIL]

Good day Chris,

Between 2019 and 2022 ish, Pepco completed a project to bury three 69kv subtransmission lines between substations in downtown Silver Spring and Montgomery Hills. They buried the wires under Georgia Ave, Seminary Rd, Hale, Birch, Linden, Fraser, Montgomery, Brookville Rd, etc.

The wires were generally buried under the roadway pavement.

Can you help me find out what type of permits or approvals were needed for Pepco to bury their wires under roads owned by MCDOT?

Did DPS have to approve or just MCDOT?

I don't see any mention of this project on MNCPPC's website so I assume there was no mandatory referral.

Thanks,

Al