
COMMENTS ON THE
JULY 2003 PUBLIC HEARING DRAFT
OLNEY MASTER PLAN

**AN ADDENDUM TO SEPTEMBER 25, 2003 COMMENTS SUBMITTED BY MS. NANCY WENDT,
REPRESENTING THE OLNEY COALITION**

Prepared By Richard D. Klein
**COMMUNITY & ENVIRONMENTAL
DEFENSE SERVICES**
8100 Greenspring Valley Road
Owings Mills, Maryland 21117
410-654-3021
800-773-4571
Fax: 410-654-3028
E-mail: info@ceds.org
Web Page: www.ceds.org

October 17, 2003

CONTENTS

INTRODUCTION 1

TRANSPORTATION PLAN 1

ENVIRONMENT 5

OTHER MASTER PLAN ELEMENTS 7

32-ACRE BOWIE MILL ROAD PARCEL 7

INTRODUCTION

Community & Environmental Defense Services (CEDDS) was retained by the Olney Coalition to assist in a review of the Public Hearing Draft of the Olney Master Plan, dated July 2003. Those represented by the Coalition view the Olney Master Plan as *THE* most important document for preserving and enhancing quality of life. This one document should make it possible for current residents, and those thinking of moving to the area, to understand how Olney ranks with other areas with respect to various quality of life criteria and how conditions may change with growth envisioned in the plan.

The draft 2003 Olney Master Plan does touch on all the key quality of life elements: land use, transportation, housing, natural environment, open space, traffic, transit, bike facilities, parks, recreation, historic resources, schools, libraries, public safety and others. The draft plan also contains much useful information and many good recommendations, but it fails to provide Olney residents with a clear understanding of:

- A. How existing conditions affect quality of life;
- B. What conditions or criteria must be met to preserve and enhance quality of life;
- C. How various land uses and growth scenarios may affect quality of life in the future;
and
- D. Why the recommended growth scenario will provide the best quality of life for both current and future Olney residents as well as all other Montgomery County citizens.

Following are two specific examples of this shortcoming.

TRANSPORTATION PLAN

Traffic congestion and safety are among the top growth-related concerns of Coalition members. While the Transportation element of the draft master plan contains a lot of traffic information, it does not clearly show how existing and recommended growth will affect congestion and safety on roads and intersections within the Olney master plan area.

On page 81 of the 2003 draft plan the following statement appears: *Although projected local growth is not significant...* But on the next page it is stated that the land use proposed in the draft master plan will cause the number of households in the Olney area to go from the current 12,000 to 14,800 for an increase of 23%. At eight- to ten-trips/household per day this could mean another 20,000 vehicle trips per day on Olney area roads. This does not seem insignificant as implied on page 81. Unfortunately, the plan fails to provide Olney residents with a context for assessing how such an increase in traffic will affect congestion and safety on their neighborhood streets and other roads. In fact, there appear to be only two places in the draft 2003 Transportation Plan chapter where “criteria” or an “acceptable degree of traffic congestion” is discussed.

On page 81 reference is made to an informal survey in which *“a majority of the respondents indicated that they are willing to live with some level of congestion to maintain their suburban, semi-rural quality of life.”*

On page 82 the reader learns that the County’s *Annual Growth Policy (AGP)* assigns an *Average Congestion Index (ACI)* of 0.55 to the Olney area. But no context is provided. In other words, the reader does not learn if an ACI of 0.55 is good or bad. The plan goes on to say that ACI will remain at 0.55 until year 2025. But, again, no context is provided. While subsequent portions of the Transportation Plan address specific roads and intersections, existing and anticipated ACI is not provided for any of these.

The lack of context continues in subsequent portions of the draft Transportation Plan which address the Intercounty Connector (ICC) and other roads. For example, the intersection of Georgia Avenue and Norbeck Road is discussed on page 84. The draft plan states that this intersection will become severely congested and implies that a grade-separated interchange will correct the problem. While the plan states the interchange should be built no mention is made of how much improvement will result or how various Olney area growth options might affect the degree of improvement.

The Transportation Plan contains a similar analysis for several other Olney area roads: Norbeck Road, Brookeville Bypass, and Cashell Road. Again, mention is made of various improvements but no analysis is provided of how possible growth scenarios will affect quality of life criteria such as Level Of Service, pedestrian safety, air quality, noise levels on most residential streets¹, and so forth.

A paragraph appears on page 86 under the heading of *Two-Lane Road Policy*. This section recommends that:

“All roadways in the rural area should be limited to a maximum of two through travel lanes, as indicated in the tabulation of street and highway classifications.”

Presumably, the “tabulation” is the table appearing on pages 97 - 100. The word “rural” does not appear in this table. So it is not clear which roads are rural and, therefore, limited to two lanes. While the table does show number of travel lanes, this includes roads which are not clearly rural, including several major highways.

Only one of the many residential streets in the Olney area are addressed in the draft Transportation plan - Cherry Valley Drive Extended.

¹ Figure 14, in the *Olney & Vicinity Environmental Resources Inventory* does show noise impact areas for MD 97, MD 108, MD 650, Norwood Road and Layhill Road.

The remainder of the Transportation plan does address town center and southeast quadrant roads but, again, the discussion lacks the supporting data Olney residents need to understand current congestion-safety issues, how future growth options will affect congestion and safety, and why recommended option is the most desirable.

Table 2, in the *2001 Potomac Subregion Master Plan* provides an example of how traffic congestion data could be presented so area residents can better understand the implications of land use changes. This table appears on the next page of these comments.

Table 2 shows existing traffic volume expressed as Critical Lane Volume (CLV). Table 2 also shows what an acceptable CLV is, although it would be even better if CLV were translated into terms directly relating to quality of life, such as increased delay during peak commuting hours. Table 2 also shows how CLV would change under two scenarios of the land use changes recommended by the Potomac master plan: with and without proposed roadway improvements.

At a minimum, the 2003 draft Olney Master Plan should include a similar table for major intersections in the area. Intersections of particular concern to Coalition members include:

MD 108 and..

Muncaster Road
 Olney Mill Road
 Bowie Mill Road
 Georgia Avenue (MD 97)
 Dr. Bird Road/Layhill Road/Ednor Road

Muncaster Mill Road (MD 115) and...

Shady Grove Road
 Redland Road
 Muncaster Road
 Bowie Mill Road
 Needwood Road
 Avery Road
 MD 28

While some of these intersections are outside the Olney master plan area, they are certainly affected by growth within the area. More importantly, congestion at these intersections affects many Olney area residents during their daily commute to work.

Additionally, the 2003 draft master plan should be amended to examine how realistic growth scenarios would affect traffic volume on residential streets. While a Critical Lane Volume of 1,525 vehicles at peak-hour might be an acceptable criteria for congestion at major intersections, such a volume is far beyond what most Olney residents would view as acceptable

Table 2**Summary of Potomac Subregion Intersection Review**

Intersection congestion determined by Critical Lane Volume (CLV)

	Existing		Master Plan land use Without Improvements		Master Plan land use With Improvements	
	AM	PM	AM	PM	AM	PM
Seven Locks Road at River Road	1559	1207	1837	1345	1368	1304
Seven Locks Road at Democracy Boulevard	1509	1173	1515	1178	1315	1121
Bradley Boulevard at River Road	1419	1479	1879	1941	1879	1941
Falls Road at River Road	1479	1461	1848	1972	1848	1972
Falls Road at Democracy Boulevard	1108	1115	1150	1186	1150	1186
Seven Locks Road at Tuckerman Lane	1695	1526	1744	1656	1284	1151
Shady Grove Road at Darnestown Road	1398	852	2831	2810	N/A - Interchange	
Great Seneca Highway at Darnestown Road	1172	881	1775	1559	1652	1559
Quince Orchard Road at Darnestown Road	1318	1280	1977	1704	1380	1440
Muddy Branch Road at Darnestown Road	1371	1268	1700	1975	1376	1665
Seneca Road at Darnestown Road	680	868	974	1849	974	1849
Dufief Mill Road at Travilah Road	652	731	836	954	836	954
Piney Meetinghouse Road at River Road	1415	1005	1868	1461	1228	1461

Notes:

1. CLV of 1600 or greater translates to Level of Service (LOS) F.
2. CLV standard for Potomac, North Potomac and R&D Village Policy Areas is a CLV of 1525 or lower.

on a residential street. A CLV of 1,525 would be roughly equivalent to more than 15,000 trips per day. Montgomery County's impressive Traffic Calming Program suggests efforts to manage traffic on residential streets at 1,000 vehicles per day.² Clearly, CLV alone is inadequate to assess the impact of increased traffic on residential streets.

The 2003 draft plan should examine each residential street within the Olney area and analyze how quality of life is affected by existing traffic volume with respect to speed, pedestrian safety, noise, property value, air quality and other quality of life factors. The plan should then set forth reasonable growth scenarios and examine how each scenario may affect quality of life for those living along the street. The plan should then conclude with an explanation as to why the recommended growth scenario is most conducive to quality of life for current and future residents.

ENVIRONMENTAL RESOURCES PLAN

Like all the other elements of the 2003 draft Olney Master Plan, the Environmental Resources Plan contains much useful information and a number of good recommendations. However, this portion of the plan fails to provide Olney area residents with a clear depiction of how various land use scenarios might affect the environmental elements which make up overall quality of life. For example, pages 70 through 77 address impacts to water resources. Many Coalition members live within the watershed of the Williamsburg Run stream system, which is part of the North Branch Rock Creek stream system. Yet Williamsburg Run is mentioned once in the draft master plan (on page 76) and is treated in a bit more detail in Chapter 1 of the *Olney & Vicinity Environmental Resources Inventory*.

Beginning with a 1979 study published by Olney Coalition consultant Richard Klein, scientists have established that stream quality degradation begins when 10% of a watershed is covered by impervious surfaces, which includes buildings, streets, sidewalks, parking lots, etc.³ Stream quality degradation becomes severe at a watershed imperviousness of 25%. The 10% and 25% thresholds were confirmed in the 158-page Center for Watershed Protection publication *Impacts of Impervious Cover on Aquatic Systems*, which was released earlier this year.⁴

Figure 17, on page 40 of the *Olney & Vicinity Environmental Resources Inventory*, shows that Williamsburg Run had a watershed which was 19% impervious in 1996. In other words, as of 1996 Williamsburg Run had passed the point where degradation begins and was headed towards the point where stream quality degradation becomes severe.

² For further detail on Traffic Calming visit: <http://www.dpwt.com/TraffPkgDiv/triage.htm>

³ Klein, R.D., 1979. Urbanization and stream quality impairment. *Water Resources Bulletin* 15(4):948-963.

⁴ *Impacts of Impervious Cover on Aquatic Systems*, March 2003, The Center for Watershed Protection, 8391 Main Street, Ellicott City, Maryland 21043, www.cwp.org

On page 72 of the 2003 draft Olney Master Plan, Environmentally Sensitive Design (ESD) and Low Impact Development (LID) techniques were advocated as a way of blunting the impact of impervious surfaces added to a watershed. While both ESD and LID provide many benefits, there is an upper limit to their effectiveness. In *Impacts of Impervious Cover on Aquatic Systems*, the Center for Watershed Protection suggests that this limit occurs at a watershed imperviousness of 25% for Environmentally Sensitive Design approaches.

The most comprehensive evaluation to date of the effectiveness of LID and other improved Best Management Practices (BMPs) was conducted on behalf of Montgomery County. The results of this evaluation were contained in a report entitled *Stream Condition Cumulative Impact Models for the Potomac Subregion*, published March 2000.⁵ The evaluation showed that BMPs could slightly reduce the effects of watershed imperviousness upon aquatic communities. Specifically, BMPs might allow a stream draining a watershed which is 19% impervious to have an aquatic community equivalent to an imperviousness level of 16%, which is a significant but slight decrease in impact. Watershed managers hope that new BMPs might provide greater benefits, but this is just a hope at this point. It will probably be 20 years before a sufficient number of watersheds are “built-out” with the new, improved BMPs to allow scientists to gage their effectiveness.

As previously stated, the *Olney & Vicinity Environmental Resources Inventory* shows that in 1996 the Williamsburg Run watershed was 19% impervious. Over the past seven years an undetermined amount of impervious surfaces have been added to the watershed. The Williamsburg Run watershed may be at the 25% imperviousness threshold where ESD, LID and highly-effective BMPs cannot prevent severe stream quality degradation.

Unfortunately, the 2003 draft Olney Master Plan is silent on the current level of imperviousness in the Williamsburg Run watershed. Thus, Olney residents are not provided with the key fact essential to understanding how growth recommended in the plan will affect Williamsburg Run. For example, the plan recommends that a 32-acre, County-owned meadow and forest on Bowie Mill Road be developed at a density of nearly 2.5 units per acre.

Could preservation of this 32-acre meadow-forest keep Williamsburg Run below the 25% threshold?

We do not know because this information was not provided in the draft master plan.

In some respects, stream systems such as Williamsburg Run are among the most important in the Olney area. No, they are not the cleanest. Nor do they support trout, endangered species, or other highly regarded resources. What they do provide is the nearest stream to many of the homes within the Olney area. In other words, these streams are the waters Olney area children most frequently come in contact with. This makes Williamsburg Run among the most important

⁵ See page 20 in *Impacts of Impervious Cover on Aquatic Systems*.

to safeguard. The same could be said for the North Branch of Rock Creek, into which Williamsburg Run flows.

Does the draft master plan set forth the best strategy for gaining the benefits of continued growth while providing adequate protection for the waters in which our children play?

We do not know because this analysis and the supporting information does not appear in the 2003 draft Olney Master Plan.

OTHER MASTER PLAN ELEMENTS

The shortcomings described above for the 2003 draft Transportation Plan and the Environmental Resources Plan also apply to all other Olney Master Plan elements, including housing, parks, recreation, public safety, and so forth. In other words, the draft plan fails to clearly show how existing conditions for each element relate to quality of life, how various growth scenarios affect each element, and why the recommended scenario provides the best quality of life for that element. In the next section of these comments the shortcomings of the School Plan are described in the context of a possible school site which the draft master plan recommends for conversion to other uses.

32-ACRE BOWIE MILL ROAD PARCEL

On page 36 of the draft 2003 Olney Master Plan a brief discussion appears of a 32-acre property identified as #17 *County-owned Land on Bowie Mill Road*. In 1967, this property was purchased by the Montgomery County Board of Education. The *1980 Olney Master Plan* stated that the property was reserved as a possible site for Olney High School. The current deed for this property shows that in 1996 it was transferred from the Board of Education to the Montgomery County government.

In four sentences the draft master plan arrives at the following recommendation for the 32-acre property:

If the property is not needed for educational purposes, it should be used for affordable housing.

The analysis of the need for this school site was limited to that presented on page 121 of the Community Facilities Plan, which stated:

The 1980 Master Plan analyzed five unused school sites in the Master plan area:...

...the Olney Senior High School site on Bowie Mill Road near the PEPCO lines was surplus and transferred to the County.

There is no explanation as to why the school site was surplus. The text above implies that surplus the site was recommended in the *1980 Olney Master Plan*. In fact, on page 83 the 1980 plan states that if the downward trend in high school enrollment continued then Sherwood

and Magruder high schools could accommodate Olney area students and the 32-acre school site would no longer be needed.

Table 9, on page 82, of the 1980 plan shows a projected 1983 enrollment at Magruder and Sherwood high schools of 1,127 and 286 students, respectively. The 2001-2002 enrollment at Magruder high school was 2,136 students and Sherwood high school had an enrollment of 1,976 students. Clearly, enrollment did not continue to decline, which was the condition set forth in the 1980 plan for surplussing the 32-acre site. Instead, enrollment at the two high schools increased by a factor of 1.9- to 6.9-times.

The third paragraph on page 123 of the Schools section of the 2003 draft Olney Master Plan begins with the following two sentences:

School facility needs are influenced also by changes in school programs and other educational initiatives (smaller class size, for example). It is possible that additional school facilities would be needed even if there is no significant increase in the area population.

But it appears that there will be a significant increase in area population. On page 82, the 2003 draft master plan states that there are 12,000 households within the Olney area now. If Olney builds out as recommended in the draft master plan then the total number of households will increase to 14,800. Based upon pupil yield factors provided by the Montgomery County Public Schools Planning Department, a household in the Magruder and Sherwood cluster generates about 0.55 students (Kindergarten through 12th grade) assuming most of the new households are single family and townhomes. In other words, the growth recommended by the 2003 draft master plan would add another 1,540 students, more than 300 of which would be high school students.

The third paragraph on page 123 of the Schools section of the 2003 draft Olney Master Plan goes on to address the school sites on Cashell Road and that on Wickham Drive, which is outside the Olney master plan area. But the text on page 123 is silent on the 32-acre site. Given the trend toward smaller class size and along with increasing enrollment, it is unclear why the 2003 plan recommends holding onto other possible school sites, but not the Bowie Mill Road property.

The draft master plan recommends allowing the 32-acre meadow to be developed as affordable housing. While the Coalition strongly supports more affordable housing in the Olney area, we are dismayed at the lack of analysis of the need to continue reserving the 32-acre Bowie Mill Road property as a possible school site. With the growth proposed in the draft 2003 plan it will become much more difficult to find a site in the Olney area, should another school be needed.

The Coalition is also troubled by the lack an analysis of community compatibility accompanying the master plan affordable housing recommendation. Coalition members include most of those who own homes next to the 32-acre property. Many of these people purchased their homes from

the mid-1980s to the present. Most researched the 32-acre property to learn what uses might be made of this land and have plats which show that their parcels adjoin Board of Education property. After learning it was slated to be a school they concluded this was compatible with the quality of life they were seeking and decided to buy a home next to the site.

We believe the *1980 Olney Master Plan* embodied a covenant between the Montgomery County government and homeowners adjoining the 32-acre school site. The covenant took the form of the 1980 master plan text which stated that the site would become Olney High School if student enrollment increased. The prospective home buyers saw that enrollment was increasing and, therefore, concluded that the site probably would become a high school. If the County now intends to break this covenant then it owes Olney area residents a thorough evaluation of all other reasonable uses of the 32-acre County-owned property.

At a minimum the evaluation should include utilizing the property to meet park, open space, water quality and recreation needs. The 32-acre site is situated along a corridor of green space which extends from Rock Creek Regional Park through Norbeck Country Club up to Cashell Park then along the PEPCO powerlines, which pass next to the property, onto the North Branch Stream Valley Park along MD 108 which then connects to the Reddy Branch Stream Valley Park.

No mention was made in the 2003 draft master plan of the possibility of utilizing this site in total, or part, for open space and recreation. On page 107 of the 2003 draft Olney Parks & Recreation Plan an analysis of needs is mentioned, but no details are given other than that three more ballfields are needed by the year 2010.

It has been more than 20 years since the 1980 Olney master plan was updated. Presumably, the next update will not take place for another 20 years. Therefore the analysis of needs should extend out at least to 2023; not end at 2010. If uncertainty exists as to what the recreation needs might be come 2023, then all the more reason to retain the 32-acre Bowie Mill Road property in County-ownership. In other words, with a shrinking supply of vacant, affordable land the 32-acres would serve as insurance against future school, open space, water quality and recreation needs.

If the 32-acre property is considered for affordable housing then the 2003 draft master plan must include a thorough analysis of all realistic affordable housing scenarios. Each scenario should then be assessed not only for ability to satisfy affordable housing needs but also compatibility with adjoining residential neighborhoods. Possible recommendations resulting from such an analysis might include:

- A. Affordable housing units adjoining existing single family homes must be of comparable size, style, height, and appearance.
- B. The density of units must not exceed the 2.44 units per acre allowed in the Montgomery County Zoning Regulations for MPDUs in the R-200 zone.

- C. Green buffers at least 150-feet in depth must be provided.
- D. The units must not exceed two stories.
- E. The sensitive environmental features on the site must be preserved.
- F. Site design must not conflict with a possible hiker/biker trail along/adjoining the PEPCO right-of-way.
- G. New roads, surface parking areas, and illuminated public areas must be designed so they do not run along the property lines of an existing development.