

## Little Falls Parkway Vision Zero Safety Improvements Environmental Assessment



**LITTLE FALLS PARKWAY  
Vision Zero Environmental  
Assessment**

**June 18, 2024**

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## 1. Executive Summary

The Montgomery County Parks Department, an agency of the Maryland-National Capital Park and Planning Commission, (MNCPPC), proposes to implement the Vision Zero safety improvements listed below along Little Falls Parkway from Dorset Avenue and Arlington Road (the “proposed action” or “build alternative” as used herein). This project is being undertaken to improve safety conditions for pedestrians and cyclists by reducing the risk of serious injury or fatal crashes between vehicles and vulnerable roadway users (including Capital Crescent Trail users.). The project has been reviewed and approved by the Montgomery County Planning Board and the Montgomery County Council. See **Appendix A: Project Location Map** and **Appendix B: Proposed Plans and Typical Sections**. The proposed safety improvements include:

1. Reducing the parkway from a four-lane, median-divided configuration to a two-lane, median-divided configuration
2. Installing low-profile separators to block unused drive-lanes but allow emergency vehicle access as needed
3. Removing unused asphalt pavement
4. Creating a buffered bike lane / protected shared use path
5. Installing intersection safety improvements
6. Installing accessible pedestrian landings
7. Installing new lane markings
8. Implementing signal timing changes
9. Installing new lane separators
10. Installing new turn lanes
11. Installing new signage

This environmental assessment (EA) analyzes the potential environmental impacts that would result from the implementation of proposed action relative to a “no-build” alternative. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality (CEQ) for the implementation of the Act (40 Code of Federal Regulations [CFR] 1500-1508) and NCPC’s NEPA regulations]. Additionally, in accordance with the requirements of Section 106 of the National Historic Preservation Act (54 United States Code [U.S.C.] 306108) of 1966 and implementing regulations (36 CFR 800), the NCPC considered the impacts of this undertaking on historic properties in a separate, but parallel process.

***Note to Reviewers and Responders:***

If you wish to comment on this EA, you may mail the comments directly to NCPC's office (see address below) or submit them electronically to NCPC through their "Comment Opportunities" page at [www.ncpc.gov/participate/notices/](http://www.ncpc.gov/participate/notices/). Before including your address, phone number, e-mail address or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

**Mailed comments may be sent to:**

National Capital Planning Commission,  
401 9th Street, NW, Suite #500N,  
Washington, DC 20004  
ATTN: Michael Weil, Little Falls Parkway Environmental Assessment

**Comments may also be submitted on-line by following the appropriate steps at:**

[www.ncpc.gov/participate/notices/](http://www.ncpc.gov/participate/notices/)

## 2. Project Purpose & Need

### 2.1 Purpose of the Action

Consistent with the Montgomery County Council's adoption of the Montgomery County Vision Zero program, the purpose of the Little Falls Parkway improvements is to improve safety and reduce the potential for collisions between autos and vulnerable roadways users (bicyclists and pedestrians) crossing or traveling along Little Falls Parkway. See **Appendix A: Project Location Map**.

### 2.2 Need for the Action

The project need is based on a history of serious injuries and fatal crashes between Capital Crescent Trail (CCT) users and vehicles traveling along and across Little Falls Parkway. Prior to 2017, the four-lane cross-section on Little Falls Parkway resulted in a multiple-lane threat scenario<sup>1</sup> – a recognized traffic safety problem occurring along road sections that are more than two lanes wide and have an uncontrolled crossing (no traffic signal or stop sign).

Following a bicyclist fatality at the crossing in October 2016, Montgomery Parks, in coordination with County police and transportation agencies, implemented a Vision Zero-based “road diet” along the Parkway between Arlington and Hillandale Roads. The interim change was a pilot project to test the effectiveness of reducing the Parkway cross-section from four to two lanes. Under the pilot, the Parkway's grass median was maintained; the outside lanes were closed with chains and flexible posts; and the speed limit was lowered from 35 to 25 miles per hour.

The likelihood of fatal injury increases dramatically for pedestrians and bicyclists if the motorized vehicle is traveling at speeds over 30 mph<sup>2</sup>. Vehicular traffic speeds along Little Falls Parkway had been an on-going problem with the four-lane configuration in the project area. Despite the posted speed limit of 35-miles per hour, a significant portion of drivers exceeded these speeds. After several years of studying the excessive travel speeds along the Parkway, the Montgomery Parks Department determined that traffic calming measures are needed to improve the general safety for Little Falls Park users and reduce overall rates of speeding along this corridor. For further information on the project history, please see **Section 3: History of the Proposed Project**.

To comprehensively address the safety of pedestrians and bicyclists within the study area, there is a need to install permanent safety measures. Rapid deployment, cost, directness of travel for and safety of pedestrians and bicyclists, and environmental impacts are decision factors used by the M-NCPPC when developing a project approach and design under the Vision Zero program. Unlike major capital projects that take years to plan, design, bid and construct, the project sponsor (Montgomery County Parks Department) intends the project to have minimal, if any, disturbance outside of the existing right-of-way. This approach is intended to minimize potential environmental impacts to Little Falls Park; to preserve the park's natural setting and uses; and to minimize costs so that M-NCPPC can implement other future safety measures elsewhere within its jurisdiction.

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<sup>1</sup> A multiple-lane threat crash involves a driver stopping in one lane on a multilane road to permit pedestrians/cyclists to cross, and an adjacent oncoming vehicle (in the same direction) striking the pedestrian who is crossing in front of the stopped vehicle. This type of crash typically results from the initial stopped vehicle obscuring the view of the second advancing vehicle which subsequently fails to yield to the pedestrian or bicyclist.

<sup>2</sup> [Safe Systems - Institute of Transportation Engineers \(ite.org\)](https://www.itsa.org/safe-systems)

### 3. Background and Project Area

#### 3.1 Existing Conditions

Little Falls Parkway is approximately 1.5-miles in length and is located within the Little Falls Stream Valley Park (SVP), with a northern terminus near Fairfax Road (north of Arlington Road) and southern terminus at Massachusetts Ave (MD 396). The Little Falls SVP is located within the Willett Branch watershed and encompasses established diverse forest stands consisting of tulip poplars, white oaks, and other tree species.

Prior to the implementation of the interim road diet condition in 2017, the Parkway operated with a four-lane cross section (two drive lanes northbound, two drive lanes southbound, with a grass median separation) between Arlington Road and River Road; and a two-lane cross section (opposing drive lanes) between River Road and Massachusetts Avenue. The project area, between Arlington Road and Dorset Avenue, currently operates as a two-lane road with opposing lanes (no median) and a series of interim “road diet” (roadway modifications to improve safety) measures.

The 11-mile Capital Crescent Trail (CCT) crosses the Parkway between Arlington Road and Hillandale Road via a mid-block raised crosswalk. The Capital Crescent Trail was built in the 1990’s as an 11-mile hard surface, shared use trail along an abandoned B&O (Baltimore & Ohio) Railroad corridor, extending from Silver Spring, Maryland to Georgetown in the District of Columbia. During peak times of year, the CCT-Parkway crossing is currently used by over 5,000 users each day, with peaks of approximately 400 users per hour.

#### 3.2 Site History

Little Falls Parkway was constructed in the late 1950’s. The original General Development Plan for Little Falls Branch Park envisioned a parkway connecting Fairfax Road to the George Washington Parkway (re-named the Clara Barton Parkway in 1989). The 1957 General Development Plan also includes the parkway, along with several active recreation areas (along the Parkway) for tennis, basketball, multi-purpose activities, tot lots, parking, picnicking, and trails. These areas were built further east and north as part of the county’s local park system as described further below.

The originally planned cross-section (with two lanes in each direction and divided by a grass median) was constructed only between Fairfax and River Roads. By the time the section of parkway between Massachusetts Avenue and River Road was under design, plans for extending the parkway to George Washington Parkway were revised to reflect the existing parkway alignment, which now terminates at Massachusetts Avenue. The final design of this section featured two opposing travel lanes with no median and limited shoulders mirroring the cross-sections of Beach Drive and Sligo Creek Parkway.

Later changes to the original vision for Little Falls Parkway included the Little Falls Trail and bike lanes along the parkway. The National Capital Planning Commission reviewed the trail and bike lane project in 1979 and described the prospect of developing Little Falls Stream Valley Park in accordance with the General Development Plan of 1957 as, “...no longer reasonable, since it is highly unlikely that the unbuilt parkway improvements and other facilities in this plan would ever be constructed even if the approved plan were not modified.” Thus, the original plans for Little Falls Parkway changed from its original

concept as a commuter route to George Washington Parkway, with adjacent recreational amenity areas, to a much shorter limited access parkway that no longer necessitated four total travel lanes.

### 3.3 Study Area Location: How is the area defined?

The project site is located between the two-lane-to-four-lane transition on Little Falls Parkway just north of Arlington Road (See Figure 2), and Dorset Avenue. These end points are described in the NEPA context as “logical termini”. That is, they are (1) rational end points for a transportation improvement and (2) rational end points of the environmental impacts.

For the purposes of performing a complete environmental analysis, a larger unit of environmental context is occasionally taken into consideration (e.g. an airshed, watershed, or nearby alternate routes). The scale and extent of the area chosen for analysis may vary depending on the resource being considered, with assessment based on readily available data sources and the best judgement of park staff, engineers, and environmental professionals.

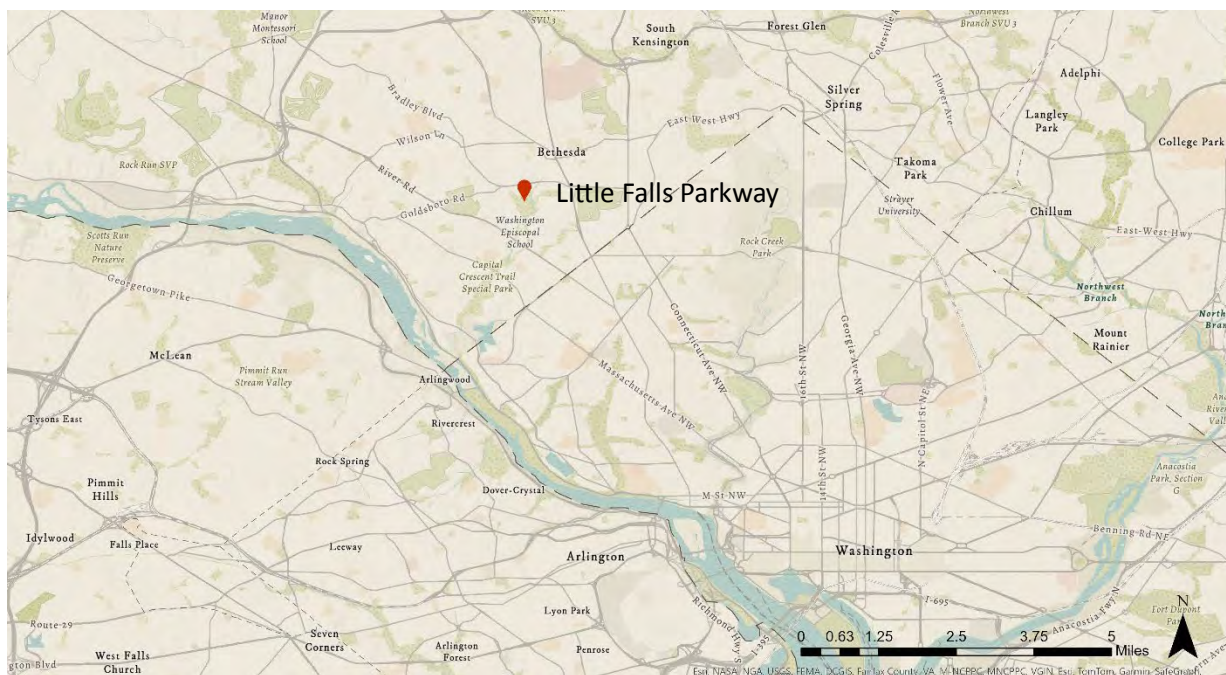


Figure 1: Regional Context for Little Falls Parkway

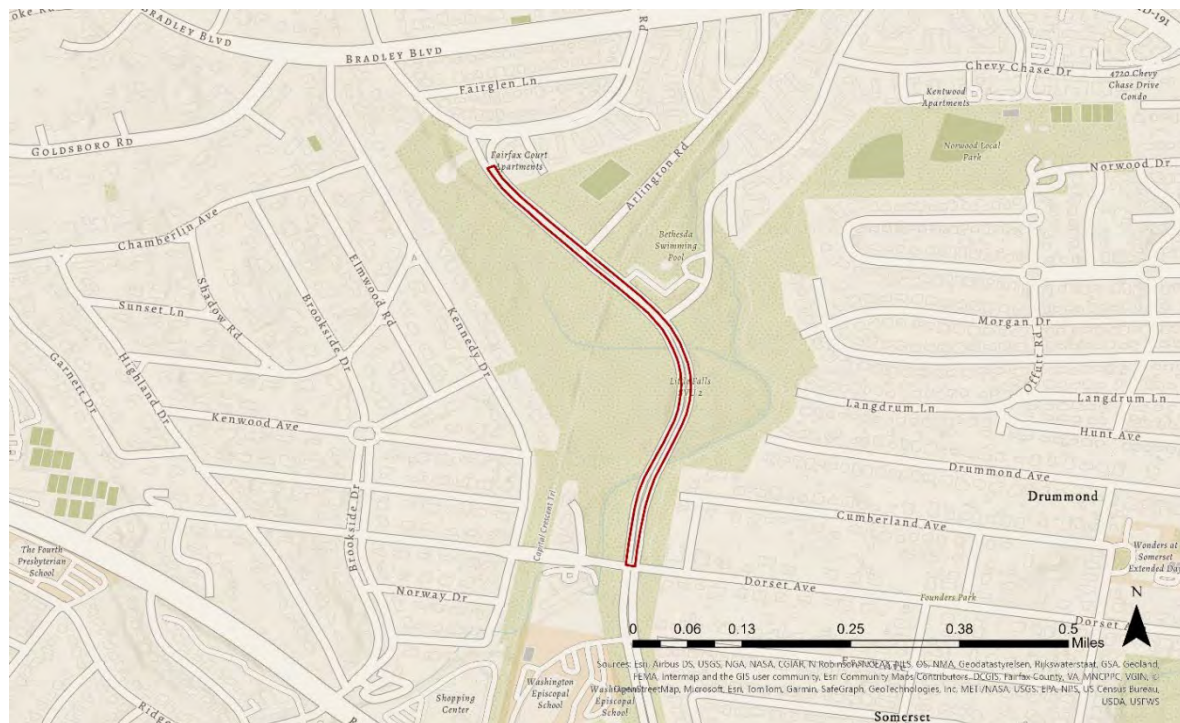


Figure 2: Limits of Vision Zero Safety Improvements

### 3.4 Vision Zero Principles

The proposed project is part of the Montgomery County 2030 Vision Zero Action Plan<sup>3</sup>, which is based on the following guiding principles:

1. Transportation-related deaths and severe injuries are preventable and unacceptable.
2. Human life takes priority over mobility and other objectives of the road system. The road system should be safe for all users, for all modes of transportation, in all communities, and for people of all ages and abilities.
3. Human error is inevitable; the transportation system should be designed to anticipate error, so the consequences are not severe injury or death. Advancements in vehicle design and technology, roadway engineering, personal electronic devices, etc., are necessary components for avoiding the impacts of human errors.
4. People are inherently vulnerable, and speed is a fundamental predictor of crash survival. The transportation system should be designed for speeds that protect human life.
5. All road users have a responsibility to respect one another, and to behave in a safe manner. Drivers have the potential to do the most harm and have a responsibility to be mindful and respectful of other in the public right of way.
6. Policies and practices at all levels of government need to align, making safety the highest priority for roadways.

<sup>3</sup> [Action Plan of Vision Zero | Montgomery County, MD \(montgomerycountymd.gov\)](https://montgomerycountymd.gov/ActionPlanofVisionZero)



### 3.5 History of the Proposed Project

The Little Falls Parkway project has had extensive opportunities for public involvement and comment (prior to MPD's referral to NCPC for review), and several iterations resulted in response to the process. The proposed action is a result of this iterative process. This history below is not exhaustive but seeks to provide a general overview of the project design, coordination, and public involvement process to date. Additional information about project history is available in previously published Montgomery County Planning Board and Montgomery County Council reports (<https://montgomeryparks.org/parks-and-trails/little-falls-parkway/>).

#### 2016-2020

Following a bicyclist fatality at the crossing in October 2016, Montgomery Parks in coordination with the Park Police and Montgomery County Department of Transportation implemented Vision Zero-based safety improvements along Little Falls Parkway between Arlington and Hillandale Roads.

The safety improvements included an interim road diet that reduced the cross-section of Little Falls Parkway from four lanes to two lanes at the trail crossing, by closing the outside travel lane in each direction. The travel lanes were closed off with chains and flexible posts, and the speed limit was reduced from 35 mph to 25 mph. The grass median dividing the northbound and southbound travel lanes remained. Subsequent traffic studies showed a significant decrease in reported crashes at the Capital crescent Trail crossing, with a total of zero crashes from 2020 through 2023 compared to six crashes (and one fatality) in 2016 alone (Figures 8 & 9, Section 8.8).

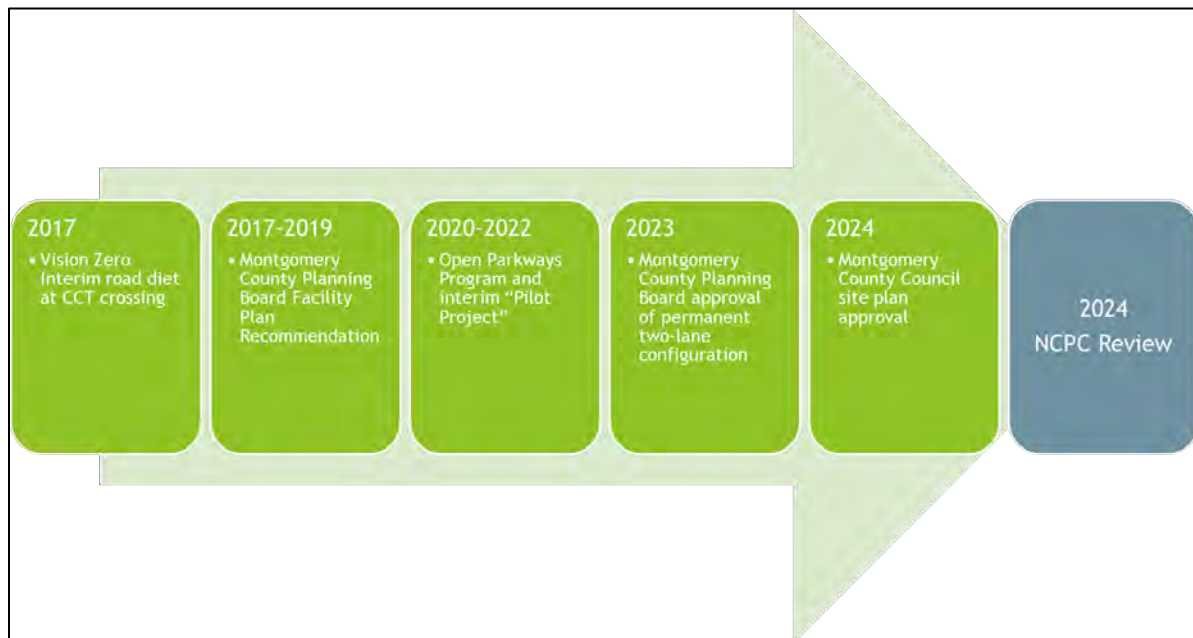


Figure 3: Project timeline

**June 2019**

With the success of the road diet in improving trail user safety, Montgomery Parks presented a Facility Plan recommendation to the Montgomery County Planning Board in June 2019 to build upon the interim road diet with a permanent two-lane Parkway cross-section. However, the Planning Board asked Montgomery Parks to study re-alignment of the CCT trail crossing to the intersection with Arlington Road, with an improved pedestrian signal. The requested re-alignment had been studied during the development of the facility plan<sup>4</sup> but was ultimately not recommended by Parks staff due to increased travel delays for vehicles and trail users. See Section 5.3 for more information on CCT trail crossing realignment.

**July 2019**

The County Council's Transportation and Environment (T&E) committee submitted a letter to the Planning Board expressing concern that removing the road diet would be a setback for Vision Zero and put pedestrians and bicyclists at risk.

**September 2019**

The Planning Board voted to delay the project to realign the CCT crossing beyond the 6-year Parks Capital Improvements Program (CIP) and maintain the existing interim road diet. The Board also asked Montgomery Parks to further improve safety at the CCT crossing by installing a raised crosswalk (a crosswalk located on top of a speed table). The raised crosswalk was subsequently installed in summer 2020.

**May 2020**

The County Council voted to remove the project to realign the CCT crossing to Arlington Road from the Parks FY21-26 CIP, maintaining the interim two-lane road diet condition indefinitely. In July 2019, the County Council Transportation and Environment committee had sent a letter to the Planning Board, expressing concern that removing the road diet (and thus returning to four drive lanes) at the CCT crossing would be a setback for Vision Zero and put pedestrians and bicyclists at risk.

**2020 Open Parkways Program**

In 2020, Montgomery Parks initiated the Open Parkways Program, which closed portions of Sligo Creek Parkway, Beach Drive, and Little Falls Parkway to vehicles during the weekends, to provide additional outdoor recreational space during the COVID-19 pandemic. This program expanded on the intended recreational use of the parkways and proved very popular. When closed to vehicles, the parkways are a welcoming and safe venue for walkers, joggers, cyclists, rollerbladers, and people participating in various other forms of recreation.

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<sup>4</sup> Montgomery Parks considers the "purpose of a facility plan is to produce a well-reasoned project cost estimate and takes the project through 30% design as required by County Council. Also known as 'preliminary design', a facility plan often includes a program of requirements (POR), engineering and environmental studies, feasibility studies, concept plans, and park management plans, topographic surveys, traffic studies, conceptual site plans, schematic drawings, cost estimates, and most of all public input". [Capital Improvements Program - Montgomery Parks](#)

The Little Falls Open Parkway program was originally implemented from Massachusetts Avenue to Fairfax Road and operated from Friday morning through Sunday evening each weekend. This portion of the Open Parkway program was suspended during the winter of 2020 due to operational challenges but was reinstated in March 2021 with the installation of traffic control gates, which made it easier to close the parkway to vehicles on the weekends. When the Open Parkway was reinstated, its limits were reduced to River Road to Fairfax Road and the operational hours were reduced to Saturdays and Sundays. The program proved to be popular, averaging over 3,000 users on a given weekend, but the closure of Little Falls Parkway led to cut-through traffic in adjacent neighborhoods as drivers found new routes to reach their destination during the closures. This increase in neighborhood traffic was confirmed through traffic counts<sup>5</sup> conducted by the Montgomery County Department of Transportation and Montgomery Parks.

### June 2021

The Montgomery County Council passed a resolution in support of enhancing Open Streets and the Open Parkway programs across the county.

**2022 Pilot Project Phase I:** To maintain a segment of the Parkway open to safe recreational use while mitigating cut through traffic on adjacent residential roadways, Montgomery Parks coordinated with the Montgomery County Department of Transportation (MCDOT) to implement a “pilot project” to revise the alignment of the Parkway between Arlington Road and Dorset Avenue. The pilot program was conducted in phases to ensure 24/7 vehicular usage along the Parkway and allow traffic counts to be taken to confirm results.

The Phase I alignment was implemented in May 2022 and consisted of extending the existing road diet at the CCT crossing between Arlington Road and Hillandale Road by adding flexible posts that close off one drive lane in each direction, while still always allowing for full vehicle access in the remaining drive lane. This effectively extended the interim road diet that had been in place at the CCT crossing since 2017.

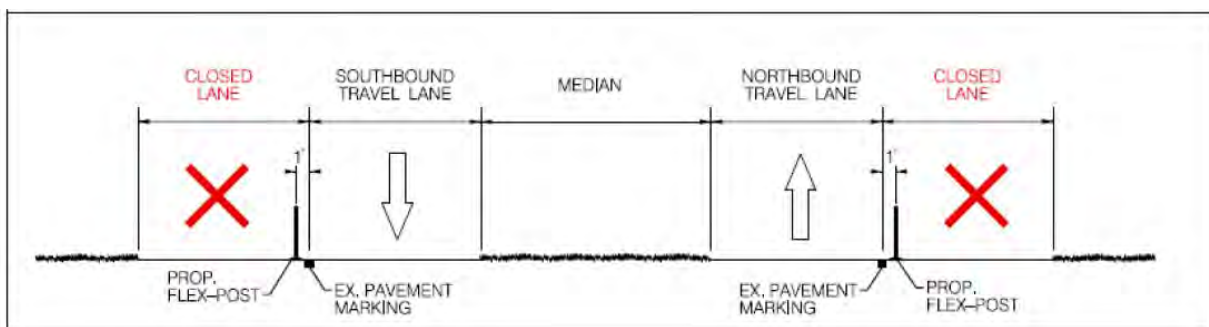


Figure 4: Pilot Program Phase 1 - Typical Section

With two lanes now open to vehicles around the clock, traffic studies conducted in July 2022 and September 2022 showed a substantial decrease in weekend traffic volumes on Kennedy Drive and Brookside Drive (in the Kenwood community) with no significant difference in traffic volumes on the Parkway or other adjacent roadways. The data showed the parkway was processing similar vehicle

<sup>5</sup> Traffic count data is available at: [2022 Little Falls Parkway Traffic Counts \(montgomeryparks.org\)](https://montgomeryparks.org/2022-Little-Falls-Parkway-Traffic-Counts)

volumes in a two-lane section as the previous four-lane section<sup>6</sup>, confirming that a two-lane section has sufficient capacity to accommodate all traffic demand. The closed lanes were not marketed for recreational use during the Phase 1 pilot due to their proximity to the travel lanes.

**2022 Pilot Project Phase II:** In November 2022, Parks built upon the demonstrated functionality of the Phase I two-lane cross section by implementing Phase II, which is the current condition encountered on the Parkway between Arlington Road and Dorset Avenue.

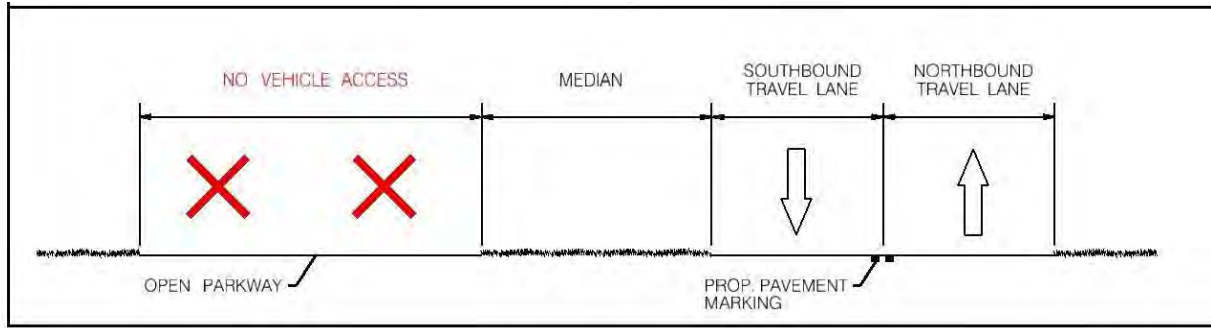


Figure 5: Pilot Program Phase II Typical Section

The Phase II re-alignment maintained two travel lanes but shifted all vehicles to the previous two northbound travel lanes, providing a single lane of travel in each direction with no median separation. Associated modifications to intersection traffic signals and signage were also performed by MCDOT to support this effort. This roadway section matches Little Falls Parkway between River Road (MD 190) and Massachusetts Avenue (MD 396) and is the same as other park roads including Beach Drive and Sligo Creek Parkway, as well as numerous two-lane roads and highways in Montgomery County. Speed limits for the entire segment of the Parkway between Arlington Rd and River Road (MD 190) were lowered to 25 mph, matching the maximum speed limit of other park roads.

The remaining two southbound Parkway lanes no longer convey vehicle traffic and effectively provide the Open Parkway recreational experience 7 days a week, without negatively affecting the functionality of the Parkway. Parks conducted additional traffic studies throughout 2022, which show the Parkway continued to serve as much traffic with two traffic lanes as it did with four lanes, but with reduced vehicle speeds and significantly improved Vision Zero safety achieved with the 2-lane configuration versus the former 4-lane parkway.

**February 15, 2023:** Montgomery County Parks (Parks) held a public meeting to share traffic engineering analysis and recommendation for a permanent two-lane configuration<sup>7</sup>. The meeting was attended by approximately 200 people. In response to the large number of questions, Parks subsequently published an online FAQ document<sup>8</sup>.

<sup>6</sup> Traffic count data is available at: [2022 Little Falls Parkway Traffic Counts \(montgomeryparks.org\)](https://montgomeryparks.org/2022-Little-Falls-Parkway-Traffic-Counts)

<sup>7</sup> For February 15, 2023, meeting recording, please see: <https://youtu.be/sWOweqm1XsM?si=7VI6Yj8mKAWkm-51>

<sup>8</sup> [Little Falls Parkway Vision Zero Project - Montgomery Parks](#)

**March 30, 2023:** The Planning Board held a public hearing for the proposed project<sup>9, 10</sup>. Over 50 people testified online and in-person. In addition, hundreds of emails, letters, phone calls, and other correspondence were received during the public comment period.

**April 27, 2023:** The Planning Board voted to approve the Parks staff recommendation for a permanent two-lane configuration of Little Falls Parkway between Arlington Road and Dorset Avenue<sup>11</sup>. The Planning Board approved site plan included other safety and connectivity enhancements, including a separated shared use trail along Little Falls Parkway. Parks subsequently proceeded with detailed design and began coordination with NCPC in accordance with the Capper-Cramton Act.

**May 8, 2023:** The Montgomery County Council adopted a motion stating that:

*Any realignment of the remaining two lanes between Dorset and Arlington on Little Falls Parkway must be reviewed by the Council before funds may be utilized for this purpose. No funds may be utilized for the implementation of a linear park in this section of Little Falls Parkway.*

The Council requested that the Parks Department develop an alternate option for Little Falls Parkway for Council review alongside the Planning Board-approved configuration<sup>12</sup>. Parks subsequently paused coordination with NCPC while the Council-requested alternate option was developed, and a review process determined.

**October 25, 2023:** The County Council sent a letter to Montgomery Parks requesting that Parks develop a non-Planning Board-recommended option (Council-Requested alternate option) that “includes a road diet on either side of the median”. Both options were to be reviewed by the Planning Housing and Parks committee (PHP) and the PHP committee’s recommendation transmitted to the full council.

**November 27, 2023:** The PHP committee was presented two options for Vision Zero roadway improvements to create a two-lane configuration of Little Falls Parkway between Arlington Road and Dorset Avenue<sup>13, 14</sup>. the key difference between the options was whether the vehicular lanes would be opposed within a contiguous 22’ wide roadway (similar to other Montgomery Parks roads in Montgomery County like Beach Drive and Sligo Creek Parkway, and other two-lane roads) or separated as single 12’ wide northbound and southbound drive lanes on either side of the existing grass median.

At the PHP Committee meeting, both options were reviewed and discussed with separate focus on the segment from Arlington to Hillandale, including the Capital Crescent Trail (CCT) crossing, and the portion

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<sup>9</sup> For the March 30, 2023, meeting recording, please see: <https://mncppc.granicus.com/player/clip/2779>

<sup>10</sup> For the March 30, 2023 Planning Board report, please see: <https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf>

<sup>11</sup> For the April 27, 2023, meeting recording, please see: <https://mncppc.granicus.com/player/clip/2791>

<sup>12</sup> For May 8, 2023 Council and Committee Session Summary page, please see: [DocumentViewer.php \(granicus.com\)](https://montgomerycountymd.granicus.com/DocumentViewer.php)

For the May 8, 2023 Council session recording, please see: [https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd\\_29592c49-2a9c-406f-a3a2-ecc5bc28de98.mp4](https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd_29592c49-2a9c-406f-a3a2-ecc5bc28de98.mp4)

<sup>13</sup> For the November 27, 2023 meeting recording, please see: [https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd\\_ca26bb93-8d6d-11ee-a93d-0050569183fa.mp4](https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd_ca26bb93-8d6d-11ee-a93d-0050569183fa.mp4)

<sup>14</sup> For the November 27, 2023 Council PHP Committee report, please see: [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&event\\_id=15964&meta\\_id=167927](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&event_id=15964&meta_id=167927)

from Hillandale to Dorset. While the merits of the opposing lane option, similar to Beach Drive and Sligo Creek Parkway, were recognized, the PHP Committee recommended single drive lanes separated by the existing grass median. In considering the segment of the Parkway between Arlington and Hillandale, the PHP committee acknowledged the success of the road diet at the CCT crossing and supported a permanent reduction to two lanes.

In considering the segment from Hillandale to Dorset, the PHP Committee recognized the speed reductions achieved with the current Pilot Project interim road diet configuration, but also acknowledged the community concerns with potential traffic growth from planned development in the local area. The Committee requested Parks reconfigure LFP to be two single lanes on either side of the existing median between Hillandale and Dorset and supported providing a separated bicycle facility along LFP, in the footprint of the existing pavement along this segment, to enhance connectivity between the CCT and Dorset Avenue. At the intersections from Arlington to Dorset, the PHP Committee supported permanent Vision Zero safety improvements. The PHP Committee requested the Montgomery Parks Department consider these recommendations and update the proposed design for review and approval by the full Council. The Parks Department subsequently updated the proposed design as recommended by the PHP Committee.

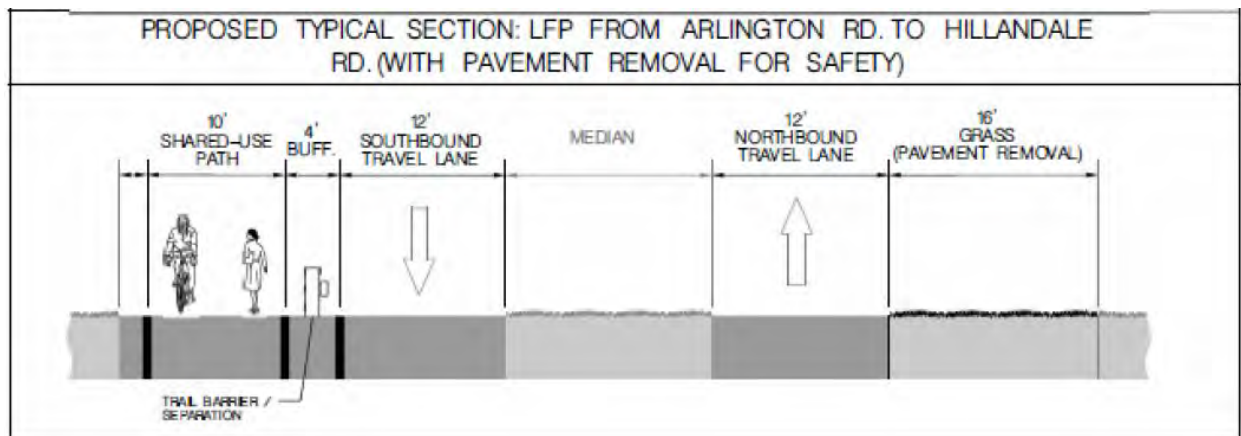


Figure 6: Proposed Typical Section between Arlington Road and Hillandale Road as approved by County Council

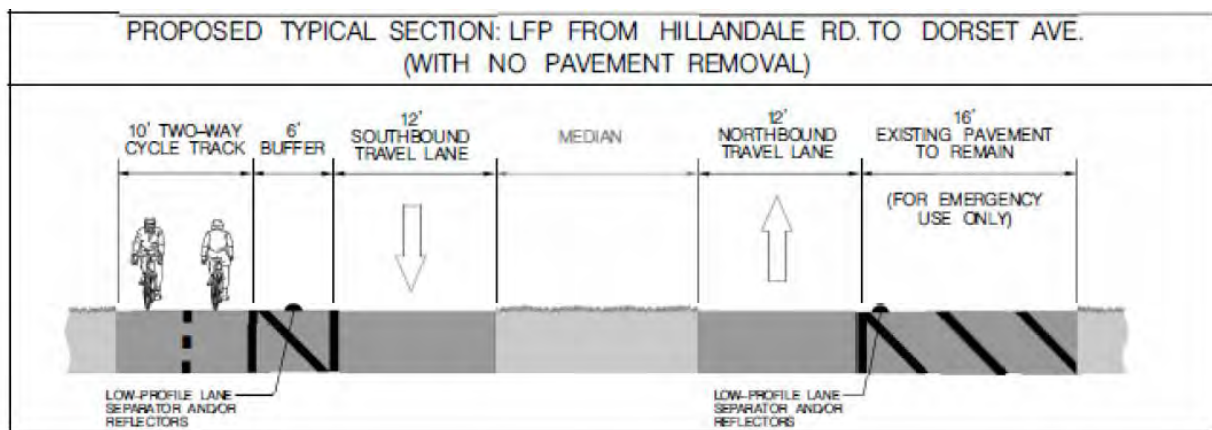


Figure 7: Proposed Typical Section between Hillandale Road and Dorset Avenue as approved by County Council



**January 23, 2024:** The County Council voted unanimously in favor of the updated recommendation, removing the Park CIP restriction from the Council's May 2023 motion, and allowing the project to move forward<sup>1516</sup>. Subsequently, Parks reopened coordination with NCPC for the County Council approved site plan, and formally referred the project proposal to NCPC for review under the Capper-Cramton Act

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<sup>15</sup> For the January 23, 2024 Council and Committee Session Summary page, please see: [DocumentViewer.php \(granicus.com\)](https://montgomerycountymd.granicus.com/DocumentViewer.php)

For the January 23, 2024 meeting recording please see: [https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd\\_6e148ea4-bb04-11ee-8fe8-0050569183fa.mp4](https://archive-video.granicus.com/montgomerycountymd/montgomerycountymd_6e148ea4-bb04-11ee-8fe8-0050569183fa.mp4)

<sup>16</sup> For the January 23, 2024 Council report, please see: [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&clip\\_id=17120&meta\\_id=170266](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&clip_id=17120&meta_id=170266)

#### **4. Statutory Basis for the NCPC Review of the Little Falls Parkway Vision Zero Safety Improvements and the Role of this Environmental Assessment**

##### **4.1 Capper-Cramton Act**

The land for Little Falls Stream Valley Park, which encompasses Little Falls Parkway, was acquired with Capper-Cramton Act (CCA) funding<sup>17</sup>. Under the Act (46 Stat. 482<sup>18</sup>), NCPC has approval authority over the more permanent changes to the parkway as proposed by the Montgomery Parks Department (which administers the land). The project under consideration was also endorsed by the County Council<sup>19</sup>. The Act grants NCPC a defined review role for the project - to determine whether the future parkway changes would be consistent with Little Falls Park as a park use or not.

The Capper-Cramton Act (CCA) of 1930 (46 Stat. 482) was enacted to acquire, establish, and develop the George Washington Memorial Parkway and multiple stream valley parks in Maryland and Virginia to create a comprehensive park, parkway, and playground system in the National Capital Region. Using Capper-Cramton funds available through the Act, the State of Maryland acquired multiple stream valleys that include Cabin John Creek, Paint Branch, Northwest Branch, Sligo Creek, and Little Falls. Those lands are now owned by the Maryland-National Capital Park and Planning Commission (MNCPPC). In addition to funding, the Act (and a 1931 Basic Agreement) granted to what is now the National Capital Planning Commission (NCPC), approval authority over Capper-Cramton park development and management plans to protect and preserve the region's watersheds and adjacent parkland.

Capper-Cramton lands may not, in whole or in part, be conveyed, sold, leased, exchanged, used, or developed for anything other than park purposes. Additionally, Capper-Cramton lands must be developed in accordance with plans that are developed by M-NCPPC and approved by NCPC. NCPC generally interprets "park purpose" to mean a public benefit such as improving the water quality of streams, along with improving park accessibility and park resources. Other examples include restoring wetlands and meadow areas in a stream valley park, stormwater management, improvements to park access and the trail network, and additions or improvements to more active recreational uses such as playgrounds.

##### **4.2 National Environmental Policy Act (NEPA)**

Based on NCPC's approval authority over development of Capper-Cramton Act-acquired property, NCPC is required to comply with the National Environmental Policy Act (NEPA). The NEPA requires the Commission to consider potential beneficial and adverse impacts to the natural and human environment from the project. Thus, NCPC has prepared this Environmental Assessment (EA), in coordination with the Montgomery Parks Department as project owner, to satisfy its NEPA obligation<sup>20</sup>. If NCPC determines there is no significant impact of the project on the human or natural environment, then NCPC would issue a Finding of No Significant Impact (FONSI).

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<sup>17</sup> [Capper-Cramton Map \(ncpc.gov\)](https://www.ncpc.gov/docs/capper-cramton-map.pdf)

<sup>18</sup> [Capper-Cramton Act \(ncpc.gov\): https://www.ncpc.gov/docs/capper-cramton-act.pdf](https://www.ncpc.gov/docs/capper-cramton-act.pdf)

<sup>19</sup> [Review Authorities \(ncpc.gov\): https://www.ncpc.gov/about/authorities/review/cca/](https://www.ncpc.gov/about/authorities/review/cca/)

<sup>20</sup> [Legislative Authorities \(ncpc.gov\): https://www.ncpc.gov/about/authorities/nepa/](https://www.ncpc.gov/about/authorities/nepa/)

#### **4.3      *National Historic Preservation Act (Section 106) and Section 4(f)***

In accordance with the requirements of Section 106 of the National Historic Preservation Act (54 United States Code [U.S.C.] 306108) of 1966 and implementing regulations (36 CFR 800), NCPC must consider the project's ("undertaking") potential to impact any historic properties. Section 106 Documentation is included in **Appendix C**. NCPC is not a transportation agency subject to Section 4(f) of the U.S. Department of Transportation Act. Further, no federal funds will be used for the project. Therefore Section 4(f) does not apply.

#### **4.4      *Endangered Species Act***

In accordance with Section 7 of the Endangered Species Act of 1973, MNCPPC on behalf of NCPC solicited comments from the USFWS and the DNR as it relates to known occurrences of rare, threatened, and endangered species within the proposed project area that would be adversely impacted by the project. Please see **Appendix D** for USFWS and DNR response letters.

## 5. Alternatives Considered

This chapter describes the alternatives for the Little Falls Parkway Improvements Project. Alternative 1 (No Build) does not address the project purpose and need and is not under consideration for implementation. Alternative 1 is included in the analysis as a baseline for comparison purposes as required under NEPA. Alternative 2, which is the “Build” alternative, is based on the Montgomery County Council-approved project under consideration by NCPC. This EA analyzes the potential environmental impacts (short-term, long-term, beneficial, adverse) of both alternatives.

### 5.1 *Alternative 1: “No Build” or “No Action” Alternative*

The “No Build” alternative, is the original “pre-pilot” Parkway configuration that existed prior to 2017, with four general travel lanes (two for northbound traffic and two for southbound traffic) between Dorset Avenue and just north of Arlington Avenue. The travel lanes would remain separated by a grassy median and the multi-lane crossing threat would remain at the CCT crossing location. There would be no weekend closures for recreational use, nor would there be any construction associated with this alternative, other than routine maintenance. Traffic volumes and travel patterns would remain as before 2017, and for the purposes of this EA, there would be no impact to the human or natural environment because no improvements would be implemented. Thus, drainage patterns, vegetation, views, safety conditions, vehicular/pedestrian/bicycle access, etc. would all exist as before the 2017 interim road diet and subsequent pilot project configurations. This alternative, however, would not meet the project’s Purpose and Need and was not approved by the Montgomery County Planning Board or County Council. Therefore, the four-lane configuration is not under consideration for implementation.

### 5.2 *Alternative 2: “Build Alternative” Vision Zero Safety Improvements (Preferred)*

The “Build” alternative is the design approved by the Montgomery County Council, developed by the Montgomery Parks Department, and currently under consideration by NCPC. Under the “Build” alternative, the existing parkway between Arlington Road and Dorset Avenue would be reduced from four lanes of vehicular traffic to two opposing lanes of vehicular traffic separated by the existing median. Between Arlington Road and Hillandale Road, the new typical section would include a buffered 10-foot shared use path on the west side of the parkway, and removal of unused lane pavement on the east side of the parkway. Between Hillandale Road and Dorset Avenue, a two-way buffered bicycle lane would be added on the west side of the parkway. Unused pavement would remain in place separated from the travel lane by low-profile lane separators which would allow for emergency vehicles to access the unused lane in case of emergency. **(See Appendix B: Proposed Plan and Typical Sections)**. New lane markings, turn lanes, signal timing updates, signage, drainage, and stormwater management improvements would be installed as part of this proposed alternative. This alternative has been identified as the preferred alternative by Montgomery County Parks, as the owner and implementing agency.

### 5.3 Alternatives Considered, but Dismissed from Further Consideration

Several additional alternatives were considered during the project's design development process. However, these were dismissed from additional consideration through the EA since they do not meet the project's purpose and need, nor do they meet MPD's objectives (Section 2.2). Thus, none of the following alternatives were formally referred to NCPC for review by the Montgomery Parks Department.

#### Bridge over or Tunnel under Little Falls Parkway

The project sponsor considered bridge and tunnel alternatives in 2019 but found these were not prudent or feasible given the costs and associated environmental impacts<sup>21</sup>. While safety improvements would be achieved by a bridge or tunnel alternative, the cost and timeliness objectives of the project would not be met due to the extensive design, permitting, and construction efforts required. Environmental impacts of a structural alternative would be major and unavoidable. Thousands of cubic yards of fill placed would need to be placed in the stream valley park, impinging on the stream valley buffer, and impacting existing wetlands<sup>22</sup>. Excavation would also be significant. This alternative would also likely yield permanent visual impacts to the corridor. As such, this alternative was dismissed from further consideration. For additional analysis, see page 25 of the Facility Plan Recommendation for Capital Crescent Trail Crossing at Little Falls Parkway Safety Improvements Program: [CAPITAL CRESCENT TRAIL LITTLE FALLS PARKWAY FACILITY PLAN MEMO \(montgomeryplanningboard.org\)](https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf).



Figure 8: Conceptual image from <https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf>

<sup>21</sup> For additional analysis, see page 25 of the Facility Plan Recommendation for Capital Crescent Trail Crossing at Little Falls Parkway Safety Improvements Program: [CAPITAL CRESCENT TRAIL LITTLE FALLS PARKWAY FACILITY PLAN MEMO \(montgomeryplanningboard.org\)](https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf)

<sup>22</sup> For additional information, see Page 25 of Appendix F of the March 28, 2023, Planning Board meeting, re: Briefing on the Little Falls Parkway Pilot Project for additional information regarding a bridge alternative: [memo \(montgomeryplanningboard.org\)](https://montgomeryplanningboard.org/wp-content/uploads/2023/03/2023-03-28-Planning-Board-Meeting-Briefing-on-the-Little-Falls-Parkway-Pilot-Project.pdf)

**Re-align Capital Crescent Trail Crossing to Arlington Road Intersection**

Re-aligning the Capital Crescent Trail crossing to the signalized intersection of Arlington Road and Little Falls Parkway<sup>23</sup> was considered by the project sponsor in 2019. However, this approach was not recommended due to resulting increased travel delays for both drivers and trail users due to additional time that would be required for a dedicated signalized pedestrian crossing phase. In particular, trail users would have a more circuitous route (that adds 300 feet to their travel distance) and additional wait time from a protected “WALK” phase across the intersection. For motorists, the impact would be experienced in both directions (both along the northbound movement turning right onto Arlington Road, and southbound, from Arlington Road on to Little Falls Parkway.) In addition, trail users (crossing the Parkway) would restrict right-turning vehicles on the red phase, whereas vehicle are permitted to make right turns on red now. These results were reflected in traffic models from the 2019 facility planning process. Thus, as described in the project history (Section 3.5), the Planning Board and County Council ultimately voted to eliminate this alternative.



Figure 9: Looking south from Little Falls Parkway and Arlington Road intersection. Conceptual image from <https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf>

**Scoping Comment Concept: Extension of “Build” Alternative to River Road (MD 190)**

The two-lane “Build” alternative is being considered from the project extent just north of Arlington Road to Dorset Avenue, approximately 0.5 miles in length. As part of scoping, several commenters recommended the proposed 0.4-mile project be extended to narrow the entire 1.5-mile Parkway to two-lanes, along with a buffered bike lane. The extension would result in a direct protected bike lane connection to River Road (MD 190). While technically feasible,

<sup>23</sup> For additional analysis, see page 24 of the Facility Plan Recommendation for Capital Crescent Trail Crossing at Little Falls Parkway Safety Improvements Program: [CAPITAL CRESCENT TRAIL LITTLE FALLS PARKWAY FACILITY PLAN MEMO \(montgomeryplanningboard.org\)](https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf)



extending the project limits would not meet the scope of the County Council approved site plan; and therefore, this alternative was dismissed from additional consideration.

### Scoping Comment Concept: Re-configuration of Little Falls Parkway and Arlington Road Intersection

As part of scoping, several commenters suggested a concept that includes re-configuring the intersection of Little Falls Parkway and Arlington Road to prioritize vehicle traffic by “merging” Little Falls Parkway into Arlington Road and removing signal controls for north- and southbound vehicles. This concept was previously studied by the Planning Board facility planning process in 2019. Although this concept would reduce travel times for some drivers, the stand-alone plan would not provide additional safety benefits along LFP or for CCT users, and would not meet the purpose and need. Thus, this concept was dismissed from additional consideration in the EA.

### Scoping Comment Concept: April 2023 Planning Board Approved Plan

As part of the scoping process, some commenters suggested a concept that was similar to the previous April 2023 Montgomery County Planning Board- approved two-lane site plan. The concept would maintain a two-lane configuration (with north- and southbound opposing lanes) along the northside of Little Falls Parkway and allow redesign the southbound lanes for use as a linear park on the other side of the grass median. While technically feasible, the previous Planning Board approved plan has been superseded by the current County Council approved “Build Alternative” and is therefore, dismissed from additional consideration in the EA.

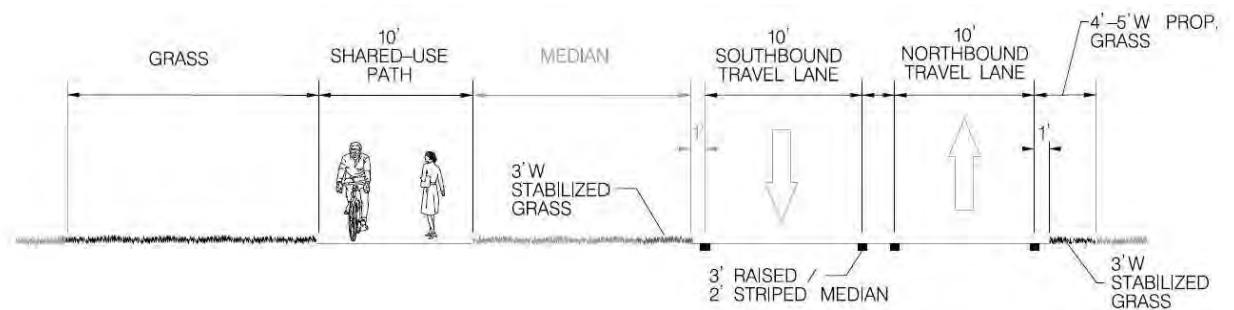


Figure 10: Planning Board approved configuration. Image from [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&event\\_id=15964&meta\\_id=167927](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&event_id=15964&meta_id=167927)

## 6. Resource Impact Topic Areas

The following definitions describe the various types, durations, and intensities for potential future environmental impacts as required under NEPA.

**Definitions:** For each environmental resource or issue, anticipated direct and indirect impacts were assessed, considering both short and long-term project impacts. Potential impacts are described in terms of **type** (beneficial, adverse, or no impact); **duration** (short or long-term); and **intensity** (negligible, minor, moderate, or major). Explanations of these terms are as follows:

**Type:** The impact type refers to whether it is adverse (negative), beneficial (positive), or no impact (neutral). Adverse impacts would potentially harm resources, while beneficial impacts would improve resource conditions.

**Duration:** Impacts resulting from construction are considered short-term and would occur during construction or site improvements. Long-term impacts would persist during the operation of properties and facilities, once the construction phase is complete.

**Intensity:** The intensity of an impact describes the magnitude of change that the impact generates. The intensity thresholds are as follows:

- **Negligible:** The impact would not result in a noticeable change in the resource.
- **Minor** (not significant): The impact would be slight, but detectable, resulting in a small but measurable change in the resource.
- **Moderate** (not significant): The impact would be readily apparent and/or easily detectable but would not substantially alter the resource or exceed regulatory thresholds.
- **Major** (significant): The impact would be widespread and would substantially alter the resource or exceed regulatory thresholds. A major, adverse impact would be considered significant under NEPA.

## 7. Resource Topics Dismissed from Detailed Analysis

NCPC, MPD, and public comments were all considered in the identification of resource topics. After review, some resource topics were deemed to be not related to the project proposal, not likely to result in impacts, or dismissed for other reasons. This section provides brief descriptions of these topics, with a brief justification for their dismissal.

**General Methodology:** The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature, code reviews, detailed technical studies, and information proved by on-site experts and other agencies, professional judgement, and park and engineering staff knowledge and insight.

### 7.1 Wetlands & Floodplains

Based on a review of the United States Geological Survey's national database (National Wetlands Inventory Layer<sup>24</sup>), riverine wetlands are shown along the length of the Willet Branch and an unnamed tributary. The Maryland Department of Natural Resources (DNR) Environmental Review Program (ERP) screening lists "Riverine Wetlands" as present for the Willet Branch and the unnamed tributary. Maryland Wetlands and Maryland Protected Wetlands were listed as "Not Present". All work is expected to take place within the existing right of way and no wetland fill or disturbance is anticipated.

The Federal Emergency Management Agency (FEMA) National Flood Hazard Layer<sup>25</sup> was reviewed. Mapped floodplains south of Dorset Avenue, but no mapped floodplains, either 100-year or 500-year, are shown within the proposed project area. The ERP screening of the project lists MD Floodplains as "Not Present".

The proposed project area is located entirely within the existing Little Falls Parkway right-of-way. No changes to any existing wetland, riverine resource, or floodplain are expected from either alternative ("Build" or "No Build"). Therefore, this resource topic is dismissed from further analysis in this EA. See **Appendix D** for the DNR ERP Screening Map.

### 7.2 Soils/Topography/Geology

The proposed project is located entirely within the existing Parkway right-of-way. The project would not result in any change to existing soils, topography, or geology for either alternative ("Build" or "No Build"). Therefore, this resource topic is dismissed from further analysis in this EA.

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<sup>24</sup> [National Wetlands Inventory \(usgs.gov\)](https://www.usgs.gov/)

<sup>25</sup> [FEMA's National Flood Hazard Layer \(NFHL\) Viewer \(arcgis.com\)](https://www.fema.gov/national-flood-hazard-layer-viewer). See also [FEMA Flood Insurance Rate Map Page, Department of Permitting Services, Montgomery County, MD \(montgomerycountymd.gov\)](https://www.montgomerycountymd.gov/DepartmentofPermittingServices/)

### *7.3 Vegetation*

The proposed project is located entirely within the existing Parkway right-of-way. No tree clearing, brush clearing, or disturbance of existing vegetation is expected from either alternative (“Build” or “No Build”). Therefore, this resource topic is dismissed from further analysis in this EA.

### *7.4 Noise*

Based on overall traffic analysis detailed in Section 8.8 below, no change to the overall traffic levels or vibrations would be expected from either alternative (“Build” or “No Build”). Accordingly, no change to overall noise levels would be expected. Some temporary and minor construction noise would be expected with the “Build” alternative. However, no major, long-term, indirect, or cumulative impacts would be anticipated. Therefore, this resource topic is dismissed from further analysis in this EA.

### *7.5 Archaeological resources*

The proposed project area consists of roadway area that has been graded and paved to create the park and parkway; therefore, any sites of archaeological significance would have been previously disturbed. In the case of the “No Build” alternative, no ground disturbing activities would occur, and no impacts would be anticipated for any potential archeological resource. The “Build” alternative would involve the removal of some impervious pavement to convert these areas to green spaces. Since these areas have already been disturbed, it is not anticipated that any archeological resources will be impacted. Thus, this resource topic is dismissed from further analysis in this EA.

### *7.6 Air quality*

Air quality improvements have been made across Maryland over the past two decades, however Montgomery County is still listed by the EPA as a “non-attainment” area which does not meet the national primary or secondary National Ambient Air Quality Standards for 8-hour ozone (moderate classification). No changes to the overall amount of vehicle traffic along the proposed project corridor are expected in either alternative (“Build” or “No Build”) (See Section 8.6 below). The addition of green space and possible addition of trees in the “Build” alternative may have negligible beneficial impacts to air quality within the parkway. The addition of a shared use path and bike lanes in the “Build” alternative may reduce the number of vehicles on the Parkway and also produce negligible beneficial impacts to air quality. However, these impacts are not expected to be measurable or have any impact on the larger local airshed. As such, no impacts are anticipated for ground-level air quality or air quality within the local airshed for either alternative.

Additionally, changes to the roadway network would typically be measured against the regional Air Quality Conformity Analysis of the National Capital Regional Transportation Planning Board which is required under the Clean Air Act. However, certain types of projects are exempt from conformity under 40 § 93.126. Table 2 of the regulations lists the following relevant categories: projects that correct, improve, or eliminate a hazardous location or feature; increasing sight distance; adding medians; bicycle

and pedestrian facilities<sup>26</sup>. As the proposed “Build” alternative falls under this exemption, no further analysis is necessary, and this resource topic is dismissed from further analysis in this EA.

### ***7.7 Historic & Cultural Resources***

Pursuant to Section 106 of the NHPA, NCPC evaluated an area of potential effects (APE) for the undertaking that includes the Little Falls Parkway itself and the immediate adjacent property along the Parkway in Bethesda, Maryland. The Salmon-Stohman House and the Wiley-Ringland House, which are a block or two east of Little Falls Parkway, are identified as the only listings in the National Register of Historic Places, in the area. Based on the scope of the project, NCPC determined there would be no adverse effects, directly or indirectly, on properties listed or eligible for listing in the National Register of Historic Places. The Maryland Historic Trust (MHT) concurred with the finding on April 29, 2024. See **Appendix C** for MHT correspondence.

Neither the “Build” or the “No Build” alternative would be expected to impact current levels of vehicular use. The current parkway alignment would remain the same and the current historic and scenic qualities would be unchanged in both the “Build” and “No Build” alternatives. Therefore, this resource topic is dismissed from further analysis in this EA.

### ***7.8 Energy/Utilities***

The proposed project is located entirely within the existing Parkway right-of-way. No impacts to existing utilities are expected from either alternative (“Build” or “No Build”). Therefore, this resource topic is dismissed from further analysis in this EA.

### ***7.9 Hazardous Materials & Waste***

The proposed project is located entirely within the existing Parkway right-of-way. No impacts to existing hazardous materials sites are expected from either alternative (“Build” or “No Build”). No hazardous materials or waste is expected to be generated from either alternative. Therefore, this resource topic is dismissed from further analysis in this EA.

### ***7.10 Environmental Justice***

The Council on Environmental Quality’s *Climate and Economic Justice Screening Tool*<sup>27</sup> was reviewed and showed no disadvantaged communities proximate to the project area. This tool uses Census Tract Boundaries as the geographic unit to analyze a collection of datasets and determine if a community is at or above the threshold for one or more environmental, climate, or other burdens, or above the threshold for an associated socioeconomic burden. For a full breakdown of the Screening Tool methodology, please see: [Methodology & data - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#).

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<sup>26</sup> [eCFR :: 40 CFR 93.126 -- Exempt projects.](#)

<sup>27</sup> [Explore the map - Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#)

Additionally, the Environmental Protection Agency (EPA) *Environmental Justice Screening and Mapping Tool*<sup>28</sup> was reviewed for a 1-mile radius from the proposed project corridor. Based on this screening tool, no disadvantaged or environmental justice communities are present within a 1-mile radius of the proposed project corridor. Like the Council on Environmental Quality Tool, the EPA tool is a geographic mapping tool that pulls from multiple data sets to provide information on race, income, limited English speaking populations, and environmental hazards such as air pollution, hazardous waste proximity, and wastewater discharge. For more information on the screening tool methodology, please see: [EJScreen Technical Documentation for Version 2.2 \(epa.gov\)](https://www.epa.gov/ejscreen/technical-documentation-for-version-2.2).

Any minor inconveniences that could arise during construction of the “Build” alternative are expected to impact all parkway users equally. The “Build” and “No Build” alternatives are not expected to disproportionately affect environmental justice populations that may be present in the area surrounding the proposed project or who may use the parkway for transportation or recreational purposes. Therefore, this resource topic is dismissed from further analysis in this EA.

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<sup>28</sup> [EJScreen: Environmental Justice Screening and Mapping Tool | US EPA](https://www.epa.gov/ejscreen/technical-documentation-for-version-2.2)



## 8. Resource Topics Retained for Detailed Analysis

This section is focused on resources that would likely be affected by implementation of the proposed project. After a general description of each topic area, the EA describes any anticipated future impacts from the “Build” and “No Build” alternative for each topic area.

**General Methodology:** The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature, detailed technical studies, information provided by onsite experts and other agencies, professional judgement, and park and engineering staff knowledge and insight.

### 8.1 Plan Consistency:

Relevant land use and transportation plans adopted by the Commission and/or Montgomery County were reviewed. The “Build” and “No Build” alternatives were evaluated against these plans for consistency. The method of evaluation was a plan review by onsite experts and other agencies, professional judgement, and park and engineering staff knowledge and insight. A synopsis of the plans reviewed is included below:

- Thrive Montgomery 2050 (Thrive) is an update to the County’s general plan and establishes a framework for future planning. Thrive establishes a commitment to improving connectivity and safety through alternate means of transportation, including conversion of “existing traffic lanes and on-street parking to create space for walkways, bikeways, and street buffers with landscaping and street trees.”
- The Westbard Sector Plan which covers the southwestern part of Montgomery County, in a radius of approximately two miles from the Bethesda and Friendship Heights commercial areas. In the plan, Little Falls Parkway is classified as a “limited access park road that runs along the eastern boundary of the Sector Plan area with truck restrictions”. The Sector Plan endorses two total lanes of traffic on Little Falls Parkway.
- The Montgomery County Bicycle Master Plan, approved and adopted in November 2018 is a key element in Montgomery County’s Vision Zero Action Plan. Regarding mid-block trail crossings, on Page 83 the Plan recommends “Traffic calming that removes traffic lanes and/or reduces the design speed of the road” as a viable solution to improve safety.
- Montgomery County is one of the first counties in the United States to adopt Vision Zero policy and action plan which commits to utilizing non-traditional, evidence-based “safe system approaches” to improve safety. Examples include narrowing travel lanes, reducing vehicle travel speeds, additional educational outreach, and enforcement. Structural changes to the roadway to calm traffic are encouraged to slow vehicle speeds.

### No Build Alternative:

The “No Build” alternative would not support the recommendations of above-listed plans, nor would this alternative meet the purpose and need for the proposed project. The pre-2017 four-lane Parkway configuration would remain, with no additional safety measures added nor a protected bike lane along the Parkway.

**Build Alternative:**

The “Build” alternative actively supports the Montgomery County Vision Zero Plan<sup>29</sup>, and the Westbard Sector Plan<sup>30</sup> by improving connectivity and safety and is considered consistent with the plan goals and objectives. The “Build” alternative would be expected to substantially improve bicycle and pedestrian connectivity and safety over existing conditions, would calm traffic patterns, would create new walkways and bikeways, and would include opportunities for landscape buffering and potential tree planting. Therefore, this alternative would result in a minor, long-term, beneficial impact with respect to Plan Consistency when considering the County as a whole. With respect to the local/sector plan area, the impacts are considered moderate, long-term, beneficial.

**8.2 Rare, Threatened & Endangered Species**

Within the proposed project area, Little Falls Parkway runs through the 160-acre Little Falls Stream Valley Park<sup>31</sup>. This urban park is largely wooded and contains one of the few natural stretches of Willett Branch<sup>32</sup> creek. It contains a 3.5-mile walking trail, a playground, the section of the Capital Crecent Trail, as well as Little Falls Parkway. The park contains a wealth of natural resource values, largely resulting from the maintenance of the floodplain and forest habitat. Creek habitats within the region have largely been channelized or buried in culverts, so the water resources within the park provide important habitat for native fauna and flora.

Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) for Federal threatened and endangered species was completed using the Information for Planning and Consultation (IPaC) website. An Official Species List (OSL) was generated for the project area. Several species (listed below) were identified in the OSL for consideration within the proposed project area.

- Northern Long-eared Bat (*Myotis septentrionalis*): Endangered
- Tricolored Bat (*Perimyotis subflavus*): Proposed Endangered
- Monarch Butterfly (*Danaus plexippus*): Candidate species

No critical habitat was identified within the proposed project area. The IPaC Northern Long-eared Bat Rangewide Determination Key was used to come to a ‘No Effect’ determination for the proposed “Build” alternative. A determination verification letter was generated on April 3, 2024. See **Appendix D for USFWS coordination**. Additionally, the proposed project was screened through the DNR Environmental Review Program (ERP). Riverine Wetlands were identified in the review and are addressed in Section 7 of this document. Coordination was initiated with the DNR Wildlife Heritage Service (WHS) requesting project review for the “Build” alternative. Coordination with WHS is ongoing. See **Appendix D for DNR coordination**.

**No Build Alternative:**

The “No Build” alternative would not impact (adversely or beneficially) endangered, proposed

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<sup>29</sup> [Vision Zero 2030 Action Plan \(montgomerycountymd.gov\)](https://montgomerycountymd.gov/vision-zero-2030-action-plan)

<sup>30</sup> [Westbard Sector Plan \(2016\) - Montgomery Planning](#)

<sup>31</sup> [Little Falls Stream Valley Park - Montgomery Parks](#)

<sup>32</sup> [Our Creeks — Little Falls Watershed Alliance | Water Action in Maryland and DC \(lfwa.org\)](#)

endangered, or candidate species. There would be no tree clearing, permanent outdoor lighting additions, changes in noise levels (factors which may impact the subject bat species), nor any other changes to the Little Falls Stream Valley Park environment. The original 4-lane Parkway configuration would remain as it existed prior to MPD's interim changes, which started in 2017.

**Build Alternative:**

The "Build" alternative would not be expected to impact (adversely or beneficially) endangered, proposed endangered, or candidate species. No tree clearing, permanent outdoor lighting additions, or permanent changes in noise levels (factors which may impact the subject bat species) are expected. No disturbance of existing vegetation or widespread pesticide/insecticide use (factors which may impact Monarch butterflies) is expected. USFWS has provided a "No Effect" determination for the Northern Long-eared Bat. The project is not anticipated to jeopardize the continued existence of any of the above-listed species. Any construction activities will be limited in scope and duration.

**8.3 Aesthetics and Visual Quality**

The area of visual influence for a project is determined by estimating the visibility of the proposed action to viewers from public places. Factors that help delineate the viewshed include the scale of the project, its proposed location, and the surrounding topography. The location of visual resources can be described in terms of foreground, middle ground, and background. For this project, the study area for aesthetics and visual quality includes Little Falls Parkway between Fairfax Road and the business park intersection approximately 450-feet south of Dorset Avenue. Because of the wooded nature of the surrounding area, and the curving roadway geometry, there are no long views into or out of the project area.

Visual resources that may have particular sensitivity within the study area include the natural wooded areas surrounding the parkway, and the experience of traveling of the gently curving parkway where the route/destination is obscured by curves in the parkway and revealed as the traveling public rounds each bend in the road. This experience of traveling a route through nature where new vistas are alternately obscured and revealed by the roadway geometry is a significant aesthetic feature of scenic and recreational parkways and byways across the nation.

**No Build Alternative:**

In the "No Build" alternative, there would be no visual changes within the study area along the Parkway. The Parkway would remain a four-lane, median-divided roadway within a park setting, which existed before the 2017 operational changes. Therefore, this alternative is considered to have no impact on aesthetics and visual quality, as the setting and character of the Parkway would remain unchanged.

**Build Alternative:**

The "Build" alternative would be expected to have temporary minor adverse impacts on visual and aesthetic quality due to staging of materials, general construction activities, and the establishment period for newly converted green space in pavement removal areas. The current temporary visual "clutter" (flex posts, traffic cones, etc.) associated with the pilot project would be removed. No change would be made to the parkway alignment or the wooded areas surrounding the parkway.

Following construction, the proposed "Build" alternative is expected to enhance the natural aesthetic of the corridor through the removal of some pavement and the relatively small addition of green landscaped areas. Opportunities for visual and aesthetic enjoyment of this beautiful stretch of parkway

will be extended to bicyclists and pedestrians, both crossing through the park on the CCT and traveling along the parkway, through the addition of dedicated buffered multi-use and bicycle lanes. Vehicular users traveling the corridor would be expected to have additional visual access to the surrounding environment without the second outside lane of traffic to block views. These impacts are considered minor, long-term, and beneficial. New lane markers, striping and associated signage would also be installed. These improvements could be considered minor, long term and adverse. However, this alternative may also be an improvement as compared to the current temporary pilot project, which includes flex posts and other temporary elements would no longer be utilized.

#### ***8.4 Water quality & Stormwater Management***

##### **Ground Water:**

Montgomery County is not listed by the Maryland Geological Survey<sup>33</sup> as having groundwater quality concerns for arsenic, radon, radon, or saltwater intrusion. However, the existing impervious Parkway surface does impact groundwater by runoff of oils and other pollutants. In the winter months, the use of salt to clear snow and ice is also a threat to water quality<sup>34</sup>. Thus, County agencies attempt to minimize the amount of salt used to treat roadways while still maintaining safe driving conditions.

##### **Surface Water/Stormwater:**

State resources on waterway classification and surface water quality were reviewed. The project is located within the drainage area for the Potomac River Montgomery County Watershed (MD 8-Digit code: 02140202)<sup>35</sup>. There are two upper perennial streams within the project area, Willett Branch and an unnamed tributary, which are designated for the following uses: Water Contact Recreation, Protection of Aquatic Life, and Public Water Supply (waterbody use class I-P)<sup>36, 37</sup>. These streams are classified as riverine habitat, are non-tidal and not listed as a Tier II high quality water<sup>38, 39</sup>.

Little Falls Parkway bridges Willett Branch approximately 600-feet north of the Dorset Avenue intersection. The unnamed tributary to Willett Branch passes through a culvert approximately 200 ft to the south of the intersection with Hillandale Road. Both streams flow to Little Falls Branch which drains to the Potomac River approximately 2.8 miles downstream from the project.

The waters within the project area do not meet standards for multiple water quality parameters including chloride and sulfate and are under Total Maximum Daily Load (TMDL) Implementation Plans for Total Suspended Solids (TSS) (Potomac River - G1161 and Chesapeake Bay - G1050), Nitrogen and Phosphorus (Chesapeake Bay - G1050)<sup>40</sup>.

##### **No Build Alternative**

With the pre-2017 four-lane configuration, salt treatment and oil and other pollutant runoff would remain unchanged. As such, there would result no changes to local water quality and stormwater

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<sup>33</sup> [Groundwater quality \(md.gov\)](#)

<sup>34</sup> [Salt \(Chloride\) \(md.gov\)](#)

<sup>35</sup> Maryland 8-Digit Watersheds: [Statewide Watershed Map Resources](#)

<sup>36</sup> [Maryland's Designated Uses, Water Quality Standards](#)

<sup>37</sup> [Designated Use Classes for Maryland's Surface Waters \(state.md.us\)](#)

<sup>38</sup> [Maryland's Tier II High Quality Waters \(2022\) \(state.md.us\)](#)

<sup>39</sup> [HQWaters Antidegradation \(maryland.gov\)](#)

<sup>40</sup> [Water Quality Assessments \(IR\) and TMDLs \(state.md.us\)](#)

management. There would be no reduction in impervious surfaces along the corridor from the original 4-lane (pre-2019) Parkway configuration. Stormwater runoff would continue to be filtered through the reinforced grass shoulders along the Parkway.

#### **Build Alternative**

Reducing the parkway to two travel lanes would likely reduce the amount of salt used to treat roadways against snow and ice. It is anticipated that the two remaining travel lanes will be managed consistently with the reduction in salt use as directed by Montgomery County. A reduction in the impervious surfaces (0.23 acres) treated by salt trucks would also reduce the amount of salt seeping into the groundwater. This is considered a negligible, long-term, beneficial impact.

While improvements to Little Falls Parkway do include a minor amount of new pavement (0.94 acres, some of which is already temporarily paved), there will be a net reduction in the total amount of impervious surface along the corridor due to 1.17 acres of pavement removal which will be converted to greenspace. To reduce the potential of contributing to the existing water quality impairments, stormwater environmental site design facilities (ESD) will be incorporated to the maximum extent possible. Possible ESD practices include micro-bioretenement facilities or drainage swales that filter runoff.

The project will also comply with all Maryland and Montgomery County stormwater management permit requirements and regulations, which typically require a net reduction in impervious (asphalt) or treatment of runoff from impervious surfaces. The two remaining travel lanes will be managed consistently with the reduction in salt use during the winter months to avoid contributing further to the chloride impairment. In addition, the project will be constructed with proper Best Management Practices (BMPs) to manage erosion and sediment during construction work and prevent adverse impacts during the construction process. Overall, this would be considered a negligible to minor, long-term, beneficial impact.

#### ***8.5 Community Facilities***

Community facilities in the near vicinity of the proposed project include the Bethesda Pool, the Park and Ride lot for the Capital Crescent Trail (CCT), and the Little Falls Park ball fields. These facilities were selected based on their near proximity to the project area and are likely to be directly impacted by the proposed project. Impact assessment is based on information provided by on-site experts and other agencies, professional judgement, and park and engineering staff knowledge and insight.

##### **No Build Alternative:**

No changes to these facilities or to their access points along Little Falls Parkway would be expected since the pre-2017 configuration would remain and there would be no additional physical or operational changes made to the park. No impacts would be expected for these facilities under the “No Build” alternative.

##### **Build Alternative:**

Pedestrian trail crossing improvements would be made at the intersections of Little Falls Parkway with Arlington Road, Hillandale Road, and Dorset Avenue. The project would remove some pavement at the entrances to the park and ride lot and the Bethesda Pool. Some minor disruptions to pedestrian and

vehicular access would be expected during the construction process. Overall, the project would improve pedestrian and bicycle connectivity to these community facilities.

The Bethesda Pool and CCT Park and Ride would likely experience minor temporary adverse impacts during the construction process with some additional noise and construction activities around the parking lot and pool entrances. Some minor disruptions to pedestrian access may be expected during construction. However, overall long-term improvements to pedestrian connectivity in this alternative would be considered a minor to moderate, long-term beneficial impact.

### 8.6 Traffic Operations

Despite population and job growth in the area surrounding Little Falls Parkway, traffic volumes on Little Falls Parkway and surrounding State roadways<sup>41</sup> have been decreasing steadily since 2001<sup>42</sup>. On Little Falls Parkway, daily traffic has decreased from 15,800 vehicles/day in 2016 to 10,300 vehicles/day in December 2022 (last traffic study conducted as part of the pilot program).

Little Falls Pkwy		River Rd (SHA Data)		Wisconsin Ave (SHA Data)	
Date	Traffic	Date	Traffic	Date	Traffic
2016	15,800	2001	27,940	2003	48,070
2017	14,100	2004	26,710	2006	41,470
2019	13,000	2007	26,180	2009	39,201
2020	4,600	2010	24,050	2012	42,000
2022 (May)	10,700	2013	22,570	2015	39,800
2022 (July)	9,690	2016	22,570	2018	39,490
2022 (Sept)	10,160	2019	22,610	No further SHA data	
2022 (Dec)	10,342	2023	17,100		

Table 1: Traffic Count Comparison. Source: Little Falls Pilot Project Traffic Studies & [MDOT SHA Traffic Count Data](#)

On River Road (MD 190), between Little Falls Parkway and the Washington, DC boundary, traffic has decreased from 27,940 vehicles/day in 2001 to 22,610 vehicles/day in 2019 (the last year SHA published traffic counts) and on MD 355 Wisconsin Avenue near Bradley Boulevard, traffic decreased from 48,070 vehicles/day in 2003 to 39,490 in 2018 (the last year SHA published traffic counts). There are many potential reasons for the long-term trend of declining traffic in the area, including multi-modal infrastructure improvements, increased public transit use, compact, mixed-use development patterns, increased teleworking or alternate work arrangements, as well as the regional dispersal of job and commercial centers away from the downtown core of the District of Columbia. Long term traffic data on the Parkway and adjacent state highways demonstrate that area wide growth has not translated to increased vehicle traffic in the Bethesda area.

#### No Build Alternative

Under the No Build Alternative, the parkway would operate as a four-lane configuration with no pedestrian/bicycle safety improvements or protected bike lanes between the CCT and Dorset Avenue. There would be no operational changes or physical changes. Levels of service and vehicular travel times would be expected to continue the pre-2017 travel patterns and volume trends as reflected in Table 1 above. The multiple lane crash threat would remain along the Parkway, which does not meet the project's Purpose and Need.

<sup>41</sup> MDOT SHA I-TMS

<sup>42</sup> See also page 17, Traffic Data: [memo \(montgomeryplanningboard.org\): https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf)



Vehicular traffic counts conducted in May 2017 along Little Falls Parkway show an average weekday daily traffic (ADT) of 6,030 vehicles/day northbound and 8,030 vehicles/day southbound, with peak traffic typically between 8:00 to 9:30 AM and 4:00 to 7:00 PM. Weekend traffic volumes are 20% to 25% lower than weekday daily traffic. Trail counts for the Capital Crescent Trail range from 2,000 to 5,000 users a day with peaks of over 400 users an hour<sup>43</sup>.

Prior to implementation of the interim road diet and safety improvements in January 2017, all vehicular movements operated at Level of Service B or better (free or reasonably free flow of traffic), except for westbound turning movements at Hillandale Road which operate at Level of Service C (stable flow of traffic.) Levels of service A – C can be indicative of conditions that result in higher vehicular speeds. Between 2017 and 2022, there has been a slight reduction in traffic volumes both on Little Falls Parkway and regionally.

### Build Alternative

Acceptable levels of service along Little Falls Parkway are expected to persist into the future under the “Build” alternative, considering planned development conditions. Montgomery Parks has worked with Montgomery Planning transportation planners to forecast Year 2045 traffic growth for the area using Montgomery Planning’s trip-based four step, regional travel demand modes (Travel/4). This is a standard model used by all local counties and jurisdictions for growth modeling. The model conservatively assumes the following conditions and inputs:

- An assumption that traffic will grow. While seemingly intuitive, this is not supported by traffic counts on the Parkway and area highways since the early 2000’s as volumes have steadily decreased.
- Pre-pandemic observed 2015 traffic counts were used as a traffic baseline condition.
- The model assumed full buildout estimated in approved planning documents including the *Bethesda Master Plan* and *Westbard Sector Plan*. It also incorporates general growth forecasts for the area as given in the year 2045 *Round 9.2 Cooperative Forecast*. This is an overall growth forecast developed among the District of Columbia and surrounding jurisdictions.

Based on these conditions and inputs the subsequent Travel/4 model forecasted a 5% traffic growth factor on Little Falls Parkway, which is likely overstated given the historical decline in traffic volumes in the area. A 5% growth factor would result in a 2045 PM peak hour volume of 1,200 vph (vehicles per hour), and an average daily traffic of approximately 11,000 vpd (vehicles per day), well within the capacity of a two-lane suburban roadway, which can typically accommodate up to 20,000 vpd. The National Parks Service *Park Road Standards* also states that two-lane roads should be implemented for vehicle peak volumes of 1,500 vph, with a standard paved width of 22’. Given the adequate levels of service under a forecasted growth condition, as well as the downward trend in traffic volumes for Little Falls Parkway and surrounding major roads, the Parkway would be expected to maintain adequate levels of service for the foreseeable future. Some minor temporary impacts and inconveniences would be expected during the construction phase; however, this alternative is not expected to yield indirect or cumulative adverse impacts to traffic operations in the area or over time<sup>44</sup>.

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<sup>43</sup> See [Appendix C of Item 12](#) March 28, 2023 Planning Board meeting, re: Briefing on the Little Falls Parkway Pilot Project for additional traffic data.

<sup>44</sup> Cut-through traffic is addressed in Section 9 below.

With the proposed safety improvements, the risk of serious injury and fatal crashes involving bicyclists and pedestrians would be expected to remain at levels seen during the pilot project, greatly reduced from pre-2017 levels (See Sections 8.7 and 8.8 below). The “Build” alternative would be expected to yield a negligible outcome with regard to vehicular levels of service along Little Falls Parkway.

Travel time runs were conducted in January 2023 along Little Falls Parkway, by vehicle, during morning and evening peak commuting hours, when traffic along the roadway is the heaviest. Five runs were conducted during each timeframe in both the southbound and northbound directions from River Road (MD 190) to Fairfax Road, a distance of 5,100 feet (~1 mile). This route traversed three traffic signals and the midblock crossing of the CCT. The average travel times were converted to an average travel speed using the overall distance traveled of 5,100 feet. This allows for a comparison to a typical signalized arterial roadway with a base free flow speed of 25 mph (the speed limit of the Parkway), and an estimation of the Parkway’s level of service (LOS), based on criteria given in the Transportation Research Board’s Highway Capacity Manual. The level of service describes traffic flow on a scale of “A” to “F”. In urban areas, a LOS of “A” typically only occurs during off-peak hours.

Travel Time Summary Table: LFP from River Road to Fairfax Road						
Direction	Travel Time (min:sec)		Speed (mph)		Arterial LOS*	
	AM	PM	AM	PM	AM	PM
SB	03:38	03:13	16	18	C	B
NB	03:10	03:22	18	17	B	B

The peak hour travel times, which represent the highest traffic volumes throughout the day, have levels of service of B (reasonable and stable free flow) and C (slightly restricted but stable) during all peak periods and travel directions. The travel times encompass time spent at the signalized intersections as well as yielding to trail traffic at the CCT crossing.

With the proposed safety improvements, the risk of serious injury and fatal crashes involving bicyclists and pedestrians would be reduced compared to the no build alternative, and greatly reduced from pre-2017 levels (See Sections 8.7 and 8.8 below), as demonstrated by the pilot project. The “Build” alternative would be expected to yield negligible to minor adverse impacts with regard to vehicular levels of service along Little Falls Parkway, with minor to moderate, long-term, beneficial impacts for bicycle and pedestrian operations.

Impacts during construction are expected to be minor, short-term, and adverse. Construction duration is expected to be approximately six to eight weeks and will be coordinated with other appropriate agencies such as Montgomery County Department of Transportation, the Maryland State Highway Administration, Montgomery County Fire Rescue Service, Park Police, and County Police. A maintenance of traffic plan will be required to further minimize any construction impacts and ensure safety of drivers and park users during work.

### **8.7 Park User Experience**

Potential impacts to visitor use and experience were assessed by considering the impacts of the existing conditions and the project alternatives on the experience of those who use the park recreationally, and who travel along Little Falls Parkway. Thus, visitor experience was considered from different perspectives that include driving, walking/running/bicycling (both crossing through the park on the CCT and traveling along the Parkway) and accessing the associated ball fields and the Bethesda Pool.

#### **No Build Alternative:**

The pre-pilot four lane configuration of the parkway would remain in place. The multiple lane threat crash risk would remain for CCT users at the trail crossing and bicyclists, walkers, and runners would travel along the Parkway using the unprotected general travel lanes. No new improvements for walking, running, or bicycling would be provided along the parkway. Pedestrian and bicycle connectivity would not be improved and opportunities for vulnerable roadway users to safely enjoy the parkway itself would not occur. The user experience for Parkway drivers would remain the same with the ability to pass slower-moving vehicles (with two lanes in each direction) and vehicles waiting to turn onto Arlington Road, with slightly faster travel times along the Parkway (See Section 8.6). Pool and ball field users would not be expected to experience any changes as access to these facilities would remain the same.

The historical four-lane condition along the project corridor would remain, likely leading to an overall increase in average vehicle speeds as compared to the pilot project. These speeds, along with the lack of pedestrian or bicycle infrastructure, make walking or bicycling along Little Falls Parkway an unpleasant and unsafe experience. Pedestrian and bicycle connectivity would not be improved and opportunities for vulnerable roadway users to safely enjoy the parkway itself would remain limited. This alternative would not meet the project purpose and need, which is based on the County's Vision Zero goal.

#### **Build Alternative:**

The "Build" alternative would add buffered multi-use path and bike lanes to the parkway; improve the CCT crossing area; and calm traffic speeds. This would be expected to improve the user experience and safety for pedestrians and cyclists through physical and visual changes to the area. As such, pedestrian/bicycle connectivity would improve along and across the parkway with meaningful opportunities created for vulnerable roadway users to safely enjoy the park and parkway. Currently, pedestrian/bicycle travel along the Parkway is relatively non-existent and the project would transform the Parkway into more of a multi-modal roadway. This would be considered a moderate to major, long-term, beneficial impact to the recreational user experience.

Drive times and levels of service would be expected to remain at acceptable levels as defined by the County's Local Area Transportation Review process (See Section 8.6). The County assessment demonstrated that the modified Parkway would be able to accommodate projected future area development and population changes. Adverse effects on vehicular user experience are not expected as a result of the "Build" alternative. The addition of minor safety elements such as armadillos and other barriers to separate traffic lanes and bicycle/pedestrian areas would have a minor, long-term adverse visual impact and negligible to minor adverse, long-term impacts to travel times along the Parkway.

Park users, including people traveling to the pool and ball field, would likely experience minor temporary adverse impacts during the construction process with some additional noise and construction activities around the parking lot and pool entrances. However, access to the Bethesda Pool and the ball fields would remain throughout construction. Following construction, the “Build” alternative would not be expected to impact these groups except in the process of reaching their destinations. Construction duration is expected to be six to eight weeks and will be coordinated with other appropriate agencies such as Montgomery County Department of Transportation, the Maryland State Highway Administration, Montgomery County Fire Rescue Service, Park Police, and County Police. A maintenance of traffic plan will be required to further minimize any construction impacts and ensure safety of drivers and park users during work. Overall impacts during construction are expected to be minor, short-term, and adverse.

### ***8.8 Public Health & Safety***

Improving public health and safety is the main impetus for the project and this is articulated through the project’s purpose and needs statement. MPD staff evaluated the “No Build” and “Build” alternatives based on relevant technical studies and pertinent literature and tracking the performance of the temporary pilot project changes. Consultation with the Montgomery County Fire and Rescue Service (FRS) has also occurred throughout the overall project planning process. Safety is considered both regarding vulnerable roadway users such as pedestrians and bicyclists, motorized vehicle users, and overall community health and safety which may rely on emergency vehicles traveling along the parkway.

Little Falls Parkway is heavily used by bicyclists and pedestrians. During the Open Parkways Program Little Falls Parkway saw an average of 544 users per day<sup>45</sup>. Bicyclists and pedestrians are considered vulnerable roadway users as they are more likely to sustain serious injury or death in the event of a crash involving a motorized vehicle. Chances of fatal injury increases dramatically if the motorized vehicle is traveling at speeds over 30 mph<sup>46</sup>. Due to its proximity to the Capital Crescent Trail (CCT), River Road (MD 190), downtown Bethesda, as well as several local parks and the Bethesda Outdoor Pool, Little Falls Parkway sees a significant amount of pedestrian and bicycle use. The proposed project area runs roughly adjacent to the CCT, a shared use trail that runs from Georgetown, DC, to Silver Spring MD. The CCT crosses the parkway between Hillandale Road and Arlington Road. The CCT is an extremely well-traveled trail with over 5,000 users each day.

The parkway is also an important route for vehicular traffic and is used for daily commutes, trips to local businesses and institutions, and for visitors to the Bethesda Pool and the Little Falls Park. As a connecting route between neighborhoods, this route is also potentially important for emergency vehicle access. For a detailed analysis of traffic operations, please see Section 8.6.

#### **No Build Alternative**

Little Falls Parkway would remain four lanes for general vehicular traffic use at the CCT crossing, with no additional pedestrian/bicycle safety measures installed, nor protected bike lanes along the Parkway. Traffic volumes and travel speeds/patterns would remain as before 2017, and the multiple-lane crash threat would still exist at the CCT crossing. In 2016, before the interim road-diet measures at the CCT, there were six crashes including one bicyclist fatality. Speed studies conducted in 2023 indicated

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<sup>45</sup> See page 6: [memo \(montgomeryplanningboard.org\): https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf)

<sup>46</sup> [Safe Systems - Institute of Transportation Engineers \(ite.org\)](https://www.ite.org/SAFE)

significantly higher vehicle speeds on the four-lane section of LFP between Dorset and River Road compared with the two-lane section at the CCT crossing, with some vehicles traveling in excess of 60 mph. Emergency vehicle access along the parkway would remain unchanged and response times would remain stable and consistent with the pre-2017 traffic levels of service. This alternative would not meet the project's Purpose and Need.

Based upon changes in recorded crashes along Arlington Road and Hillandale Avenue between the pre-2017 four lane configuration and subsequent two-lane road diet configuration, four lanes allow for higher vehicle speeds and thus we would expect the numbers of crashes involving only vehicles to rise a moderate amount over time. Emergency vehicle access along the parkway would be expected to remain unchanged. Emergency response times would be expected to remain stable and consistent with the current level of service. Therefore, there would be no impact to emergency response times.

### **Build Alternative**

In the "Build" alternative, one lane of traffic in each direction would exist, separated by the existing median, with additional pedestrian/bicycle safety measures and protected bike lanes along the Parkway. The multiple-lane crash threat would be eliminated, which directly supports the project's purpose and need. Traffic calming measures would be expected to moderate vehicular speeds, improving safety outcomes for vulnerable roadway users in the event of a crash. Without the proposed traffic calming features, vehicular speeds would be expected to exceed the 25-mph speed limit, thereby increasing the risk of vulnerable user fatalities in the event of a crash.

The phased Pilot Program has resulted in substantial crash reductions along the parkway and at the CCT crossing. Since the raised crosswalk was installed in 2020, no crashes have been reported at the CCT crossing, as compared to six crashes in 2016 alone<sup>47</sup>. Safety improvements have also extended to vehicular users. M-NCPPC measured a significant reduction in overall crashes between motorized vehicles along the two-lane segment of Little Falls Parkway during the Pilot Program. Following installation of the current interim road diet measures, the number of overall crashes has declined from twelve to five crashes. In addition, the number of pedestrian/bike crashes has declined from six in 2016 (with one fatality) to zero from 2020 through 2023, with no fatalities.

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<sup>47</sup> [Parks memo2.pdf \(granicus.com\):  
https://montgomerycountymd.granicus.com/View?doc\\_id=169&clip\\_id=17120&meta\\_id=170266](https://montgomerycountymd.granicus.com/View?doc_id=169&clip_id=17120&meta_id=170266)

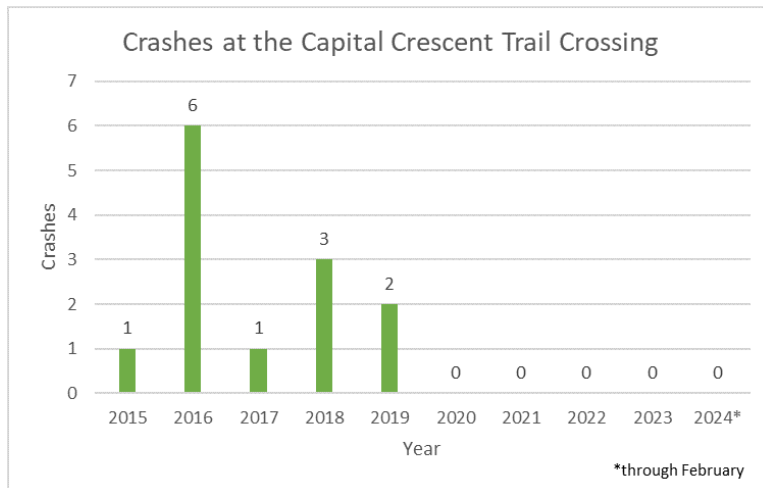


Figure 11: Crashes at the Capital Crescent Trail Crossing.

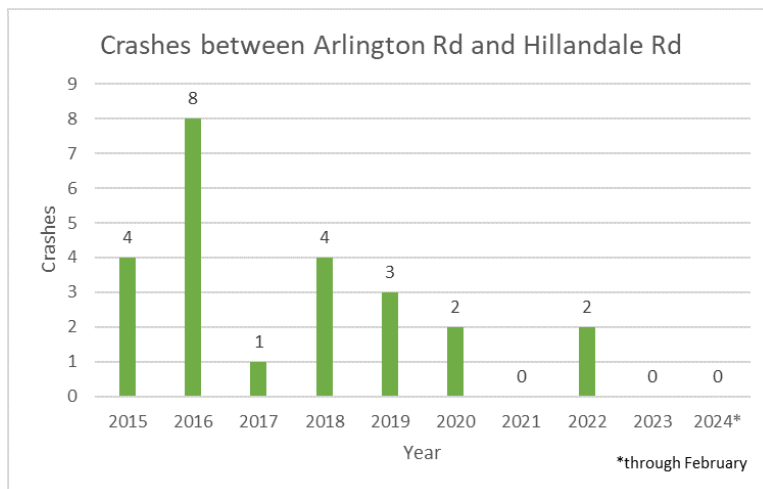


Figure 12: Crashes between Arlington Road and Hillandale Road.

The buffered bike lane would considerably improve safety for bicycle users between the CCT and Dorset Avenue. The protected shared use path to be implemented between Arlington Road and Hillandale Road is expected to improve safety for pedestrians and cyclists accessing the CCT, Bethesda Swimming Pool, Little Falls Trail, and surrounding residential communities. In this alternative, the current levels of pedestrian/bike crashes within the proposed project corridor would be expected to decrease when compared to the “No Build” alternative. As shown in the table above (Figure 8), the number of CCT crashes has decreased from six to zero (which represents a 100% decrease), and this trend would be expected to continue under the build condition. This is considered a moderate, long-term, beneficial impact.

During the pilot program, there was a negligible reduction in crashes involving only vehicles. This reduction would be expected to remain steady in the “Build” alternative, resulting in a negligible, long-term, beneficial impact.

Traffic calming measures implemented during the Pilot program have also been successful in mitigating excessive speeding along the corridor, further reducing the risk of serious injury or fatality. A speed study, measuring vehicular spot travel speeds, was conducted before the end of the school year in June 2023 along the two-lane segment between Hillandale Road and Dorset Avenue, and the four-lane segment south of Dorset Avenue to MD 190. Average speeds were compared to previously measured average speeds along the two-lane segment between Arlington Road and Hillandale Avenue.

- Average speeds between Arlington and Hillandale (two-lane, with raised crosswalk for Capital Crescent Trail crossing): 18 mph, 1% of traffic exceeding 30 mph.
- Average speeds between Hillandale and Dorset (two-lane): 33 mph, 5% of traffic exceeding 40 mph.
- Average speeds between Dorset and MD 190 (four-lane): 36 mph, 23% of traffic exceeding 40 mph, multiple drivers exceeding 65 mph.

The single lane road configuration with additional traffic calming has resulted in slower vehicle speeds, fewer vehicle crashes, and substantially reduced conflicts with trail users, compared to a four-lane road. Overall compliance with posted speeds in the proposed project corridor is considered a moderate, long-term, beneficial impact.

Montgomery County Public School bus operations and emergency vehicle access and operations would be expected to remain unchanged or exhibit minor improvements. No change in bus operations has been noted by Montgomery County Public Schools under the interim pilot programs. No change in emergency response times has been noted by Montgomery County Fire Rescue under the Pilot programs. Coordination has been ongoing with Montgomery County Fire Rescue (DFRS) regarding potential impacts of the proposed two-lane configuration on their operations and response times. DFRS staff had no concerns about emergency response times with the proposed “Build” alternative. Unused pavement on the east side of the parkway would remain in place separated from the travel lane by a low-profile lane separator which would allow emergency vehicles to use the lane in case of emergency. This would be expected to produce negligible reductions in the amount of time emergency vehicles would need to navigate traffic along the corridor. The “Build Alternative” meets emergency access and operational requirements per National Fire Protection Association (NFPA) 1 and Montgomery County Fire Code. Overall emergency response times are expected to remain the same or show negligible improvements. This is considered negligible to minor long-term beneficial impact.

Overall impacts during construction are expected to be minor, short-term and adverse. Construction duration is expected to be six to eight weeks and will be coordinated with other appropriate agencies such as Montgomery County Department of Transportation, the Maryland State Highway Administration, Montgomery County Fire Rescue Service, Park Police, and County Police. A maintenance of traffic plan will be required to further minimize any construction impacts and ensure safety of drivers and park users during work.

Overall, the “Build” alternative is expected to have a moderate, long-term, beneficial impact with respect to public health and safety. While emergency response time benefits are likely to be negligible to minor, the more noticeable benefits to pedestrians and bicyclists would result in greater (moderate) benefits to public safety within the park.



## 9. Indirect and Cumulative Effects

The CEQ regulations, which implement NEPA, require the evaluation of cumulative effects in the decision-making process as, “an impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative effects can result from individually minor, but collectively moderate or major actions taking place over a period of time” (40 CFR 1508.7).

If a project does not result in a significant direct impact nor significant indirect impact, then the project would not contribute to the cumulative impacts. Cumulative impacts were considered for all alternatives and no adverse indirect or cumulative impacts would be anticipated as a result of the proposed project action. This analysis considers two items here in detail due to their potential to generate indirect and/or cumulative impacts.

### *9.1 Impacts to Surrounding Communities:*

During the Covid-19 pandemic, plans for the road diet were temporarily put on hold when the Open Parkways Program was implemented to help meet the need for safe, socially-distanced outdoor recreational activities. As part of the program, from April to November 2020, the parkway was completely closed to vehicular traffic on weekends. This program was extremely popular with an average of 3,000 bicycle and pedestrian users on the parkway each weekend. This program was continued in the summer of 2021. However, these closures resulted in significant cut-through traffic on adjacent neighborhood roads.

In June 2022, Phase 1 of the road diet was implemented, reopening two lanes of Little Falls Parkway to vehicular traffic throughout the week. Traffic studies were conducted in July 2022, September 2022, and December 2022 and all showed a substantial decrease in weekend traffic volumes on neighborhood roads through the Kenwood community<sup>48</sup>. No baseline traffic counts in neighboring communities were conducted in 2020 prior to the implementation of the Open Parkways Program. This means there is no directly comparable baseline data to against which to evaluate the 2022 traffic counts. However, traffic counts in neighboring communities after the Phase 1 implementation are in line with what would reasonably be expected for local traffic given the size and density of the community.

Additionally, there has been no significant difference in traffic volumes on Little Falls Parkway or other adjacent roadways<sup>49</sup>. The Parkway has been processing similar vehicle volumes in a two-lane section as the previous four-lane section. For additional information on MPD’s assessment, please consult the March 2023 Montgomery County Planning Board Report: [memo \(montgomeryplanningboard.org\): https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf)

Based on these analyses, no adverse indirect or cumulative impacts to surrounding communities are expected with the implementation of the “Build” alternative.

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<sup>48</sup> Traffic count data is available at: [2022 Little Falls Parkway Traffic Counts \(montgomeryparks.org\)](https://montgomeryparks.org/2022-little-falls-parkway-traffic-counts)

<sup>49</sup> Traffic count data is available at: [2022 Little Falls Parkway Traffic Counts \(montgomeryparks.org\)](https://montgomeryparks.org/2022-little-falls-parkway-traffic-counts)

### 9.2 Travel Time & Level of Service:

Adequate levels of service along Little Falls Parkway are expected to persist under the “Build” alternative, even under planned development conditions. Parks has worked with Montgomery Planning transportation planners to forecast Year 2045 traffic growth for the area using Montgomery Planning’s trip-based four step, regional travel demand modes (Travel/4). This is a standard model used by all local counties and jurisdictions for growth modeling. Assumptions used in this model are outlined in *Section 8.8: Traffic Operations*. Based on these conditions and inputs the subsequent Travel/4 model forecasted a 5% traffic growth factor on Little Falls Parkway, which is likely overstated given the historical decline in traffic volumes in the area. A 5% growth factor would result in a 2045 PM peak hour volume of 1,200 vph (vehicles per hour), and an average daily traffic of approximately 11,000 vehicles per day, well within the capacity of a two-lane suburban roadway, which can typically accommodate up to 20,000 vehicles per day. The National Parks Service *Park Road Standards* also states that two-lane roads should be implemented for vehicle peak volumes of 1,500 vehicles per day, with a standard paved width of 22-0’.

The “Build” alternative maintains an above-standard level of service in the forecasted 2045 growth scenario. Given the adequate roadway capacity under the forecasted growth condition, as well as the downward trend in traffic volumes for Little Falls Parkway and surrounding major roads, the “Build” alternative is not expected to generate adverse cumulative or indirect impacts to travel times or levels of service in a community growth scenario<sup>50</sup>.

For additional information on MPD’s assessment please see: Impact of Future Growth on Little Falls Parkway (page 11) [memo \(montgomeryplanningboard.org\): https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf)

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<sup>50</sup> See page 11: Impact of Future Growth on Little Falls Parkway. [memo \(montgomeryplanningboard.org\): https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf](https://montgomeryplanningboard.org/wp-content/uploads/2023/04/MCPB-Agenda-Item-13-Little-Falls-Parkway-PB-Supplemental-Report-April-27-2023.pdf)

## 10. Public Outreach and Involvement

Since implementation of the interim road diet at the CCT crossing in early 2017, and through the Planning Board and County Council review and approvals throughout 2023 and 2024, there have been numerous opportunities for public comment. Public comment opportunities included meetings with residents and community organizations, written feedback periods, testimony before the Planning Board and County Council, and others. A summary of public outreach and involvement is presented below; a detailed project timeline is available in previous Section 3.5.

- **June 2018:** Community meeting at Somerset Elementary School where Parks presented concept site plans as part of the facility planning process for safety improvements at the CCT crossing of Little Falls Parkway. Approximately 60 people attended. In-person community feedback was received at the meeting with written feedback accepted afterwards.
- **October 2018:** Joint MC DOT and Parks community meeting at Bethesda Chevy Chase High School where Parks presented the top concept alternatives. Additional information on other area trail and safety improvements were presented by MC DOT. Approximately 100 people attended. In-person community feedback was received at the meeting with written feedback accepted afterwards.
- **November 2018** (through February 2019): Open Town Hall forum operated by Montgomery Parks to obtain community feedback on concept alternatives. Over 300 individual positions were received.
- **November 2018:** Parks meeting with the Pedestrian, Bicycle, and Traffic Safety Advisory Committee (PBTSAC), a group of citizens, elected officials and government representatives focused on pedestrian and bicycle safety issues in Montgomery County. Community feedback was received at the meeting with written feedback accepted afterwards.
- **February 2019:** Parks meeting with several Bethesda area homeowner associations including the Town of Somerset, the Citizens Coordinating Committee on Friendship Heights (CCCFH), Kenwood Citizens Association, Kenwood House, Hillandale Town Houses, and others. Community feedback was received at the meeting with written feedback accepted afterwards.
- **March 2019:** Parks meeting with the Coalition for the Capital Crescent Trail (CCCT), a non-profit volunteer group that helped develop the trail and provides continued advocacy for improvements and trail upgrades. Community feedback was received at the meeting with written feedback accepted afterwards.
- **June 2019:** Montgomery County Planning Board review and action of Parks facility plan recommendation of a permanent two-lane Little Falls Parkway configuration at the Capital Crescent Trail crossing. The Planning Board solicited written feedback for several weeks before the session. During the session, numerous residents and community representatives testified before the Board.
- **February 2023:** Parks virtual community meeting to present results of the pilot project traffic studies with recommendation of permanent two-lane configuration of Little Falls Parkway to allow for vehicular flow as well as “Open Parkway” recreational usage. Approximately 180

people attended. Community feedback was received at the meeting with written feedback accepted afterwards.

- **March 2023:** Montgomery County Planning Board work session where Parks presented an informational briefing on the recommended permanent two-lane configuration and the Planning Board received public testimony. Over 40 people testified in person or virtually before the Planning Board. The Planning Board also opened a public comment period for written feedback in advance of the April 2023 session.
- **April 2023:** Planning Board work session, during which they voted to approve a permanent two-lane configuration of Little Falls Parkway.
- **November 2023:** Parks work session and presentation to the Montgomery County Council's Planning, Housing, and Parks (PHP) Committee. The PHP committee reviewed the Planning Board approved plans and provided feedback. The committee did not solicit public testimony at this work session.
- **January 2024:** In early January Parks and the County Council published a revised configuration for public review, incorporating revisions recommended by the PHP committee. The County Council opened a public comment period in advance of the January 23, 2024, work session and received over 1,000 pieces of correspondence. At the work session the Council voted unanimously to approve the revised site plan.

For additional detailed documentation on these meetings, Planning Board hearings, and County Council meetings, please refer to the MPD Little Falls Parkway project page at <https://montgomeryparks.org/projects/directory/little-falls-pilotproject/>.

On February 29, 2024, NCPC began its public scoping process for the project, with a virtual informational meeting held for the public (hosted by NCPC) on March 12, 2024, at 7:00 PM. Approximately 70 people attended the scoping meeting with many community members asking questions through an on-line chat function. Per NCPC's protocols, public comments were officially received through NCPC's web page for the project ([www.ncpc.gov/projects/MP046/](http://www.ncpc.gov/projects/MP046/)) or by mail at NCPC's office. The scoping period concluded on March 29, 2024, with a total of 117 comments (many were multiple pages in length) received from the public. As part of the scoping process, NCPC staff also fielded phone calls, responded to e-mails, and attended a site visit with community members.

A listing of all public comments received during the scoping period is included in **Appendix E**.

## **11. Consultation and Coordination**

- Appendix C: Maryland Historical Trust/Section 106
- Appendix D: Department of Natural Resources
- Appendix D: U.S. Fish and Wildlife Service
- Montgomery County Council (Links to coordination materials included throughout)

## 12. Sources:

### AASHTO Journal

2022, January 21. Maryland Reducing Road Salt's Environmental Impact. [Maryland Reducing Road Salt's Environmental Impact – AASHTO Journal](#)

### EPA

Maryland Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants [https://www3.epa.gov/airquality/greenbook/anayo\\_md.html](https://www3.epa.gov/airquality/greenbook/anayo_md.html)

### FWS

National Wetland Inventory Mapping <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

### Google

- Maps
- Streetview – image date November 2021
- Google Earth Pro

### Maryland Geological Survey

Groundwater <http://www.mgs.md.gov/groundwater/index.html>

### Maryland Department of the Environment

Historical Air Quality Data

<https://mde.maryland.gov/programs/air/AirQualityMonitoring/Pages/HistoricalData.aspx>

Statewide Watershed Map Resources

<https://mdewin64.mde.state.md.us/WSA/TMDLWaterSheds/index.html>

Water Quality Assessments (IR) and TMDLs <https://mdewin64.mde.state.md.us/WSA/IR-TMDL/index.html>

TMDLs and Water Quality Plans for the Potomac River Montgomery County

<https://mde.maryland.gov/programs/Water/TMDL/Pages/Potomac-River-Montgomery-County.aspx>

Chesapeake Cleanup Center

[https://mde.maryland.gov/programs/water/TMDL/TMDLImplementation/Pages/cb\\_tmdl.aspx](https://mde.maryland.gov/programs/water/TMDL/TMDLImplementation/Pages/cb_tmdl.aspx)

Designated Use Classes for Maryland's Surface Waters

<https://mdewin64.mde.state.md.us/WSA/DesigUse/index.html>

[https://mde.maryland.gov/programs/water/tmdl/waterqualitystandards/pages/wqs\\_designated\\_us.es.aspx](https://mde.maryland.gov/programs/water/tmdl/waterqualitystandards/pages/wqs_designated_us.es.aspx)

Maryland's Tier II High Quality Waters (2022)

<https://mdewin64.mde.state.md.us/WSA/TierIIWQ/index.html>

Winter Salts

<https://maryland.maps.arcgis.com/apps/Cascade/index.html?appid=b3c8425c387348659273eb889b007edb>

Stormwater Print <https://mdewin64.mde.state.md.us/SSDS/SWP/index.html>

### **Maryland Department of Transportation**

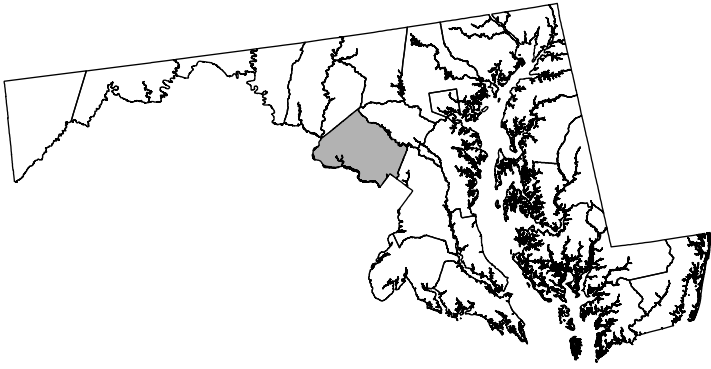
Seasonal Salt Usage Reduction Techniques Fact Sheet [Salt\\_Reduction.pdf \(maryland.gov\)](#)

### **Montgomery County Parks**

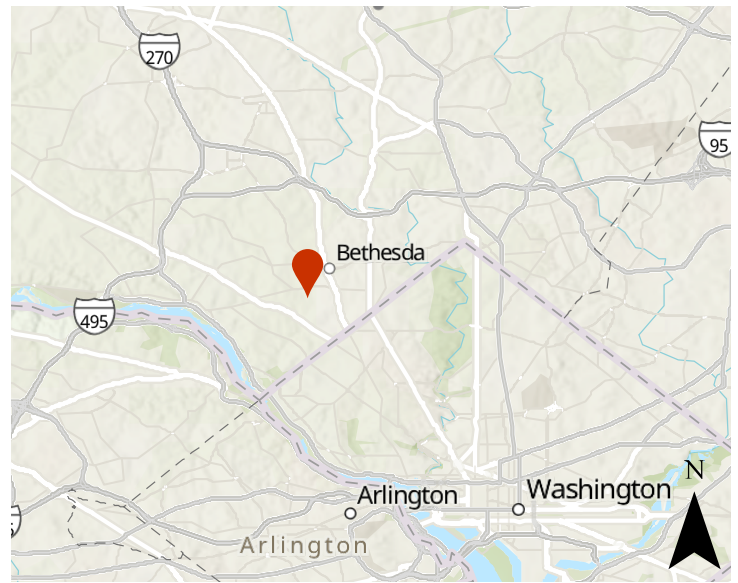
- 2019 Planning Board Facility Plan report: <https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf>
- March 2023 Planning Board report: <https://montgomeryplanningboard.org/wp-content/uploads/2023/03/MCPB-Agenda-Little-Falls-Parkway-PB-Report-March-2023-signed.pdf>
- November 2023 Council PHP Committee report: [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&event\\_id=15964&meta\\_id=167927](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&event_id=15964&meta_id=167927)
- January 2024 Council report: [https://montgomerycountymd.granicus.com/MetaViewer.php?view\\_id=169&clip\\_id=17120&meta\\_id=170266](https://montgomerycountymd.granicus.com/MetaViewer.php?view_id=169&clip_id=17120&meta_id=170266)



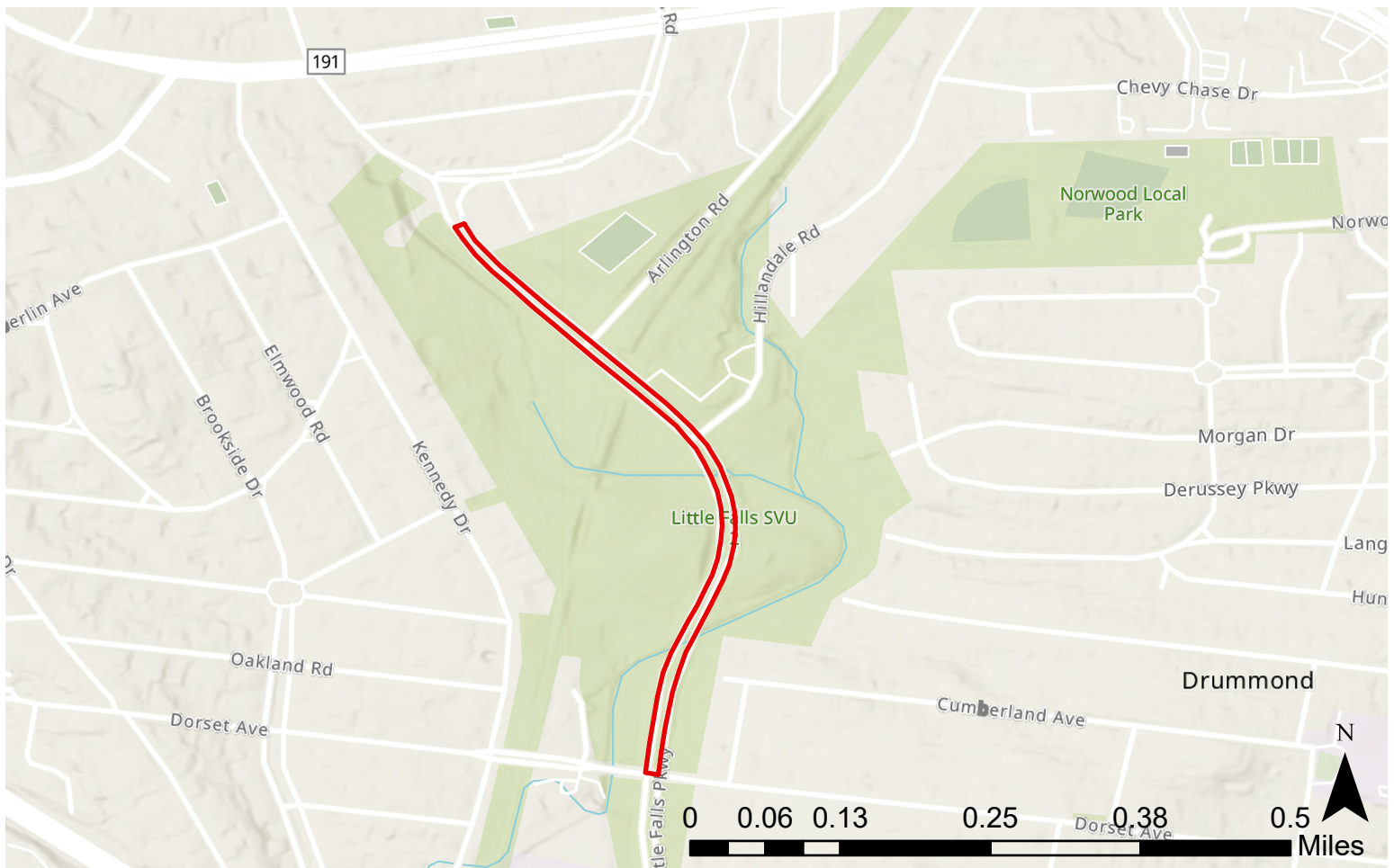
## **Appendix A: Location Map**



Montgomery County, Maryland



Project Vicinity



Project Location

**Little Falls Parkway  
Vision Zero Safety Improvements  
Arlington Road to Dorset Avenue  
Montgomery County, Maryland**

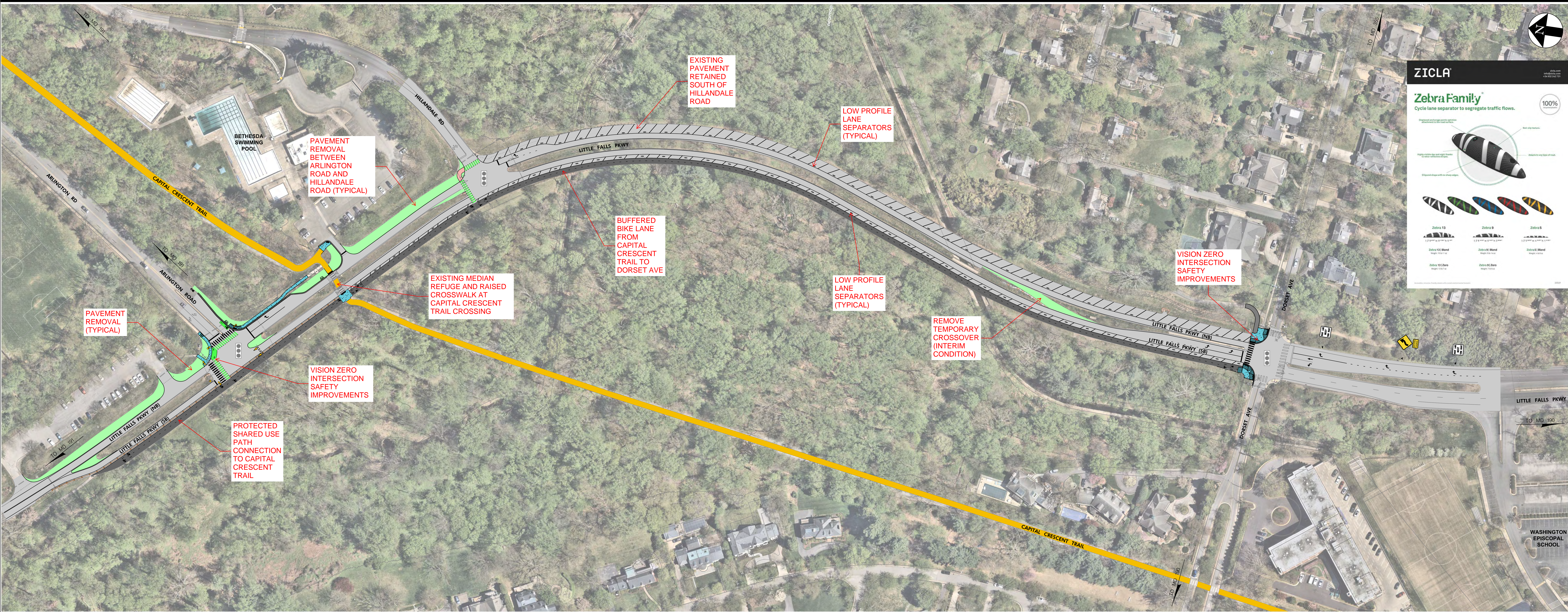
6/5/2024

Esri, NASA, NGA, USGS, Esri, NASA,  
NGA, USGS, FEMA, Esri Community

**Appendix B:**  
**Proposed Plans & Typical Sections**



OPERATOR02430 - PLOTTED: 12/13/2023  
FILE NAME: 2019\25 MNCPPC Contract 390482-000 Category F Civil and Water Resources\_Prime\Task 6 Little Falls Parkway road diet 2021\dwg\Three Alternatives\LFP\_Arlington-Dorset\_Opt\_1.dgn



**ZICLA**

**Zebra Family**  
Cycle lane separator to segregate traffic flows.

100% tested product

Directional arrow and zebra stripes separate placement to the road surface.

Highly visible day and night thanks to reflective stripes.

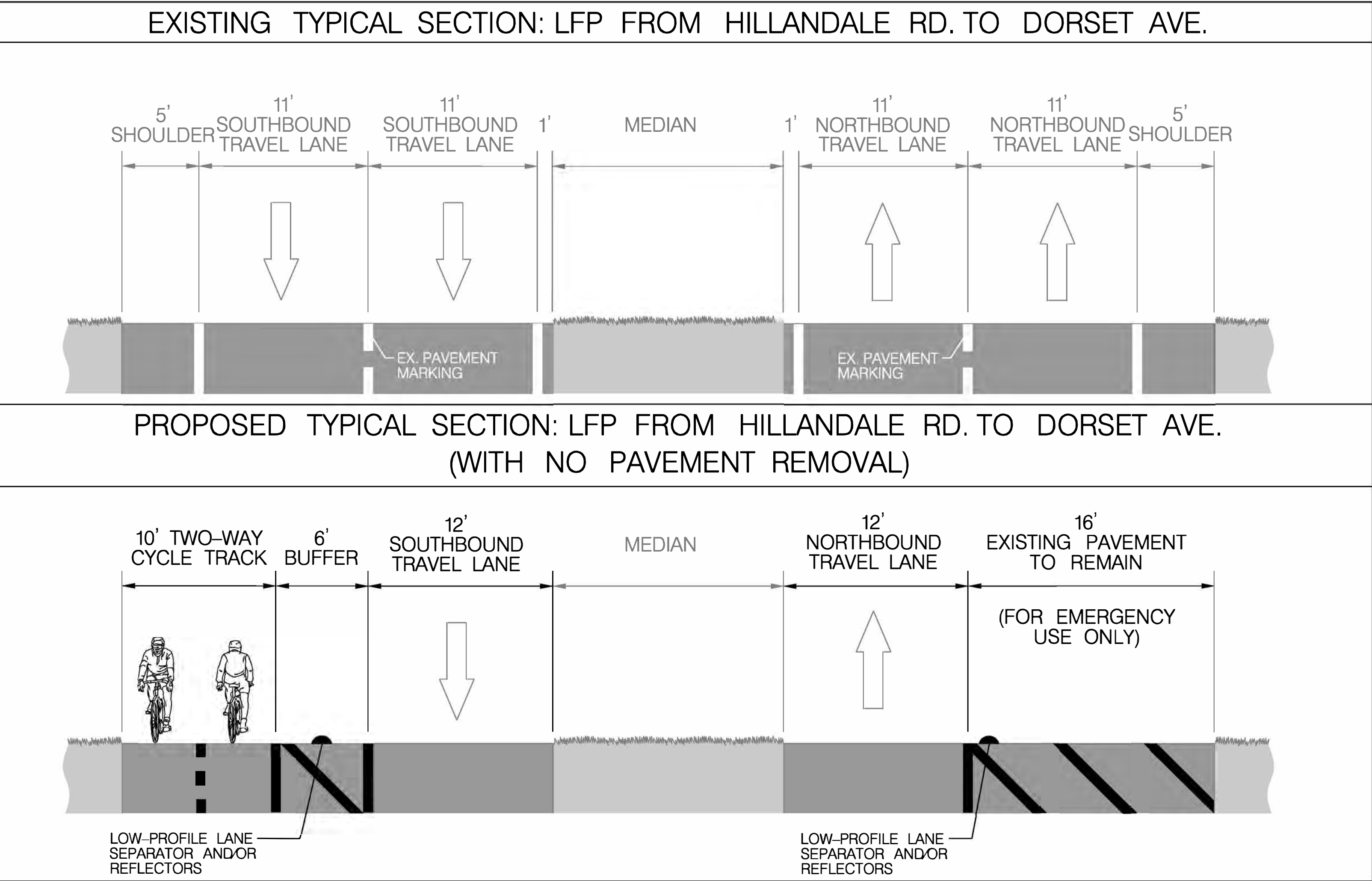
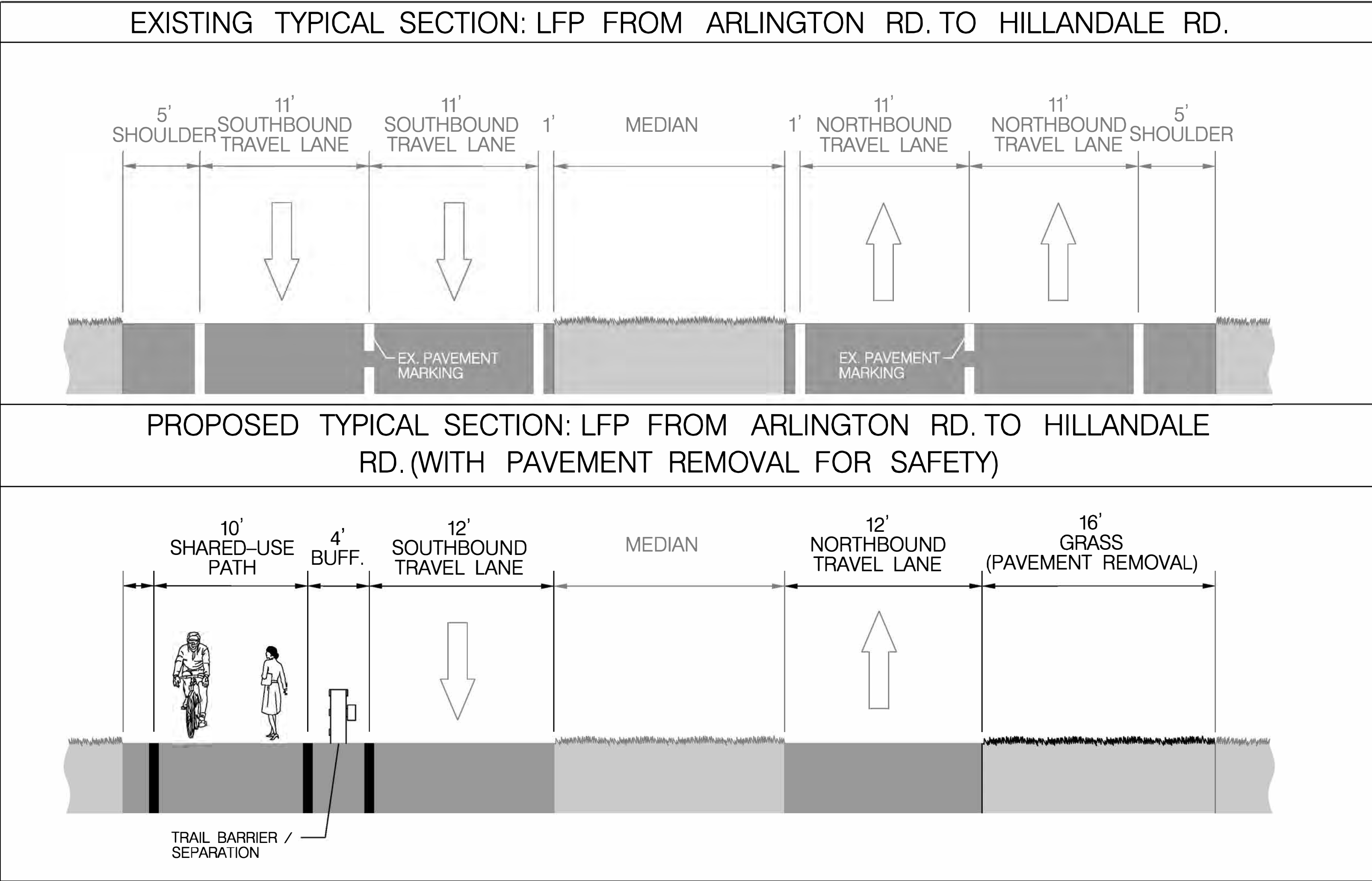
Elongated shape with no sharp edges.

Non-slip texture.

Adapts to any type of road.

Zebra 13 1.2' x 6' min w, 6' min h, 6' min	Zebra 9 1.2' x 6' min w, 6' min h, 6' min	Zebra 5 1.2' x 6' min w, 6' min h, 6' min
Zebra 13 Blend Height: 15.5' x 1.5'	Zebra 9 Blend Height: 15.5' x 1.5'	Zebra 5 Blend Height: 15.5' x 1.5'
Zebra 13 Zero Height: 15.5' x 1.5'	Zebra 9 Zero Height: 15.5' x 1.5'	





**Appendix C:**  
**Section 106**

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**From:** Maryland Historical Trust <[donotreply@maryland.gov](mailto:donotreply@maryland.gov)>  
**Sent:** Monday, April 29, 2024 12:53 PM  
**To:** Webb, Lee <[lee.webb@ncpc.gov](mailto:lee.webb@ncpc.gov)>  
**Subject:** MHT e106 project review – MHT Completed Comments

**Date:** April 29, 2024

**To:** Lee Webb  
National Capital Planning Commission

**Project Name:** Little Falls Parkway Reconfiguration and Lane Reduction between Arlington Road and Dorset Avenue, Bethesda  
**County:** Montgomery County  
**Agency:** National Capital Planning Commission  
**Second Agency:** -- Not noted --  
**MHT Log #:** 202401741

**MHT Response:** Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency's findings:

**The undertaking will have no adverse effect on historic properties. Additional consultation with our office may be required if there are any significant changes in project scope or location.**

Thank you for your cooperation in this review process. Since the MHT response is now complete, this response will appear in the Completed section of your project dashboard. No hard copy of this response or attachments will be sent. If you have questions, please contact the following MHT project reviewers:

Tim Tamburrino [tim.tamburrino@maryland.gov](mailto:tim.tamburrino@maryland.gov)



Beth Cole [beth.cole@maryland.gov](mailto:beth.cole@maryland.gov)



Maryland Historical Trust  
Project Review and Compliance  
100 Community Place  
Crownsville, MD 21032  
[mht.section106@maryland.gov](mailto:mht.section106@maryland.gov)

[MHT.Maryland.gov](http://MHT.Maryland.gov)  
[Planning.Maryland.gov](http://Planning.Maryland.gov)

**Appendix D:**  
**USFWS & DNR Correspondence**



Wes Moore, Governor  
Aruna Miller, Lt. Governor  
Josh Kurtz, Secretary  
David Goshorn, Deputy Secretary

May 13, 2024

Ms. Marissa Brown  
Blackwater Environmental Group  
Executive Plaza 2, Suite 600  
11350 McCormick Road  
Hunt Valley, MD 21031

**RE: Environmental Review for Little Falls Parkway M-NCPPC Improvements for Capital Crescent Trail Users, Montgomery County, Maryland.**

Dear Ms. Brown:

The Wildlife and Heritage Service has no official records for State or Federal listed, candidate, proposed, or rare plant or animal species within the project area shown on the map provided. As a result, we have no specific concerns regarding potential impacts to such species or recommendations for protection measures at this time. If the project changes in the future such that the limits of proposed disturbance or overall site boundaries are modified, please provide us with revised project maps and we will provide you with an updated evaluation.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at [lori.byrne@maryland.gov](mailto:lori.byrne@maryland.gov) or at (410) 260-857

Sincerely,

Lori A. Byrne,  
Environmental Review Coordinator  
Wildlife and Heritage Service  
MD Dept. of Natural Resources

ER# 2024.0598.mo

# Little Falls Parkway M-NCPPC Montgomery County

MIHP: Georgetown  
Branch B&O Railroad

- Resources Screened but not Present:
- MD Sea level Rise Vulnerability
  - MD Sea level Rise Wetland
  - MD Floodplain
  - MD Wetlands
  - MD Protected Lands
  - Submerged Aquatic Vegetation
  - Tier II High Quality Waters
  - Trout Population Watershed
  - Anadromous Fish
  - Sea Level Rise
  - Critical Area Towns and Counties
  - Sensitive Species Project Review Areas
  - Natural Oyster Bar
  - Waterfowl
  - National Register of Historic Places
  - MHT Preservation Easement
  - Equity Focus Area Census Tracts
  - Priority Funding Area
  - Best Natural Areas
  - Special Protection Areas

- Project Area
- Maryland Inventory of Historic Properties
- Little Falls Branch Park Local Protected Lands  
Capper Crampton Little Falls SVU2
- Riverine Wetland R2UBHx  
Unnamed Tributary to Willett Branch; I-P





## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Chesapeake Bay Ecological Services Field Office  
177 Admiral Cochrane Drive  
Annapolis, MD 21401-7307  
Phone: (410) 573-4599 Fax: (410) 266-9127



In Reply Refer To:  
Project code: 2024-0072176  
Project Name: Little Falls Parkway Road Diet

04/03/2024 17:38:58 UTC

Federal Nexus: no  
Federal Action Agency (if applicable):

**Subject:** Record of project representative's no effect determination for 'Little Falls Parkway Road Diet'

Dear Marissa Brown:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on April 03, 2024, for 'Little Falls Parkway Road Diet' (here forward, Project). This project has been assigned Project Code 2024-0072176 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

### **Ensuring Accurate Determinations When Using IPaC**

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat Rangewide Determination Key (Dkey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

### **Determination for the Northern Long-Eared Bat**

Based upon your IPaC submission and a standing analysis, your project has reached the determination of "No Effect" on the northern long-eared bat. To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed

action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

### **Other Species and Critical Habitat that May be Present in the Action Area**

The IPaC-assisted determination for the northern long-eared bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Monarch Butterfly *Danaus plexippus* Candidate
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

### **Next Steps**

Based upon your IPaC submission, your project has reached the determination of “No Effect” on the northern long-eared bat. If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the northern long-eared bat. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Chesapeake Bay Ecological Services Field Office and reference Project Code 2024-0072176 associated with this Project.

## Action Description

You provided to IPaC the following name and description for the subject Action.

### 1. Name

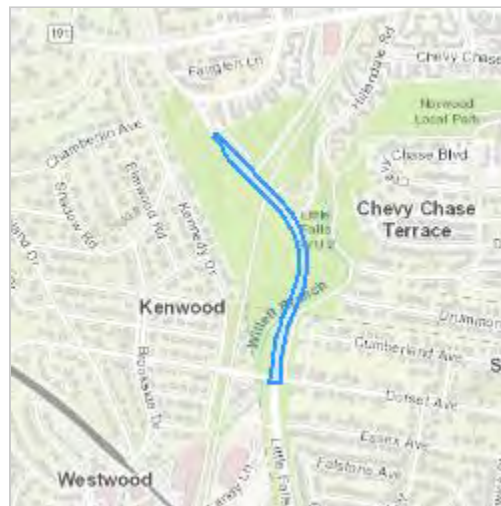
Little Falls Parkway Road Diet

### 2. Description

The following description was provided for the project 'Little Falls Parkway Road Diet':

On Little Falls Parkway, between Arlington Road and Hillandale Avenue, unused asphalt will be permanently removed to shorten the crossing of Little Falls Parkway for users of the Capital Crescent Trail (CCT). A protected shared use path will be provided between Arlington Road and the Capital Crescent Trail crossing, enhancing community connectivity to the existing shared use path at the northern terminus of Little Falls Parkway. South of Hillandale Road to Dorset Avenue, all existing pavement is retained, and a buffered bike lane will be provided in the unused southbound drive lane. Low profile separators will be used to block off the unused drive lanes, which do not prevent usage by emergency vehicles when needed. Additional work will include safety enhancements at Arlington Road, Hillandale Road, and Dorset Avenue, improved signage, re-location of traffic signals, stormwater management, and accessibility improvements.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.97172625,-77.1000564705578,14z>



## DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the Endangered northern long-eared bat (*Myotis septentrionalis*). Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

## QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of the northern long-eared bat or any other listed species?

**Note:** Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Does any component of the action involve construction or operation of wind turbines?

**Note:** For federal actions, answer 'yes' if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

3. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

No

4. [Semantic] Is the action area located within 0.5 miles of a known northern long-eared bat hibernaculum?

**Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

**Automatically answered**

No

5. Does the action area contain any caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating northern long-eared bats?

No



6. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities?  
(If unsure, answer "Yes.")

**Note:** If there are trees within the action area that are of a sufficient size to be potential roosts for bats (i.e., live trees and/or snags  $\geq 3$  inches (12.7 centimeter) dbh), answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

Yes

7. Will the action cause effects to a bridge?

No

8. Will the action result in effects to a culvert or tunnel?

No

9. Does the action include the intentional exclusion of northern long-eared bats from a building or structure?

**Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local U.S. Fish and Wildlife Services Ecological Services Field Office to help assess whether northern long-eared bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures

No

10. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats**?

No

11. Will the action directly or indirectly cause construction of one or more new roads that are open to the public?

**Note:** The answer may be yes when a publicly accessible road either (1) is constructed as part of the proposed action or (2) would not occur but for the proposed action (i.e., the road construction is facilitated by the proposed action but is not an explicit component of the project).

No

12. Will the action include or cause any construction or other activity that is reasonably certain to increase average daily traffic on one or more existing roads?

**Note:** For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

No

13. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

14. Will the proposed action involve the creation of a new water-borne contaminant source (e.g., leachate pond pits containing chemicals that are not NSF/ANSI 60 compliant)?

No

15. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

16. Will the action include drilling or blasting?

No

17. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

No

18. Will the proposed action involve the use of herbicide or other pesticides (e.g., fungicides, insecticides, or rodenticides)?

No

19. Will the action include or cause activities that are reasonably certain to cause chronic nighttime noise in suitable summer habitat for the northern long-eared bat? Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time.

**Note:** Additional information defining suitable summer habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

No

20. Does the action include, or is it reasonably certain to cause, the use of artificial lighting within 1000 feet of suitable northern long-eared bat roosting habitat?

**Note:** Additional information defining suitable roosting habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

No

21. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

*No*

22. Will the action result in the use of prescribed fire?

*No*

23. Will the action cause noises that are louder than ambient baseline noises within the action area?

*No*

# PROJECT QUESTIONNAIRE

## **IPAC USER CONTACT INFORMATION**

Agency: Private Entity

Name: Marissa Brown

Address: 11350 McCormick Rd

City: Hunt Valley

State: MD

Zip: 21031

Email: marissa@blackwaterenvironmentalgroup.com

Phone: 4102527870



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Chesapeake Bay Ecological Services Field Office  
177 Admiral Cochrane Drive  
Annapolis, MD 21401-7307  
Phone: (410) 573-4599 Fax: (410) 266-9127



In Reply Refer To:

04/03/2024 16:21:02 UTC

Project Code: 2024-0072176

Project Name: Little Falls Parkway Road Diet

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed, and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through IPaC by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see [Migratory Bird Permit | What We Do | U.S. Fish & Wildlife Service \(fws.gov\)](#).

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Chesapeake Bay Ecological Services Field Office**

177 Admiral Cochrane Drive

Annapolis, MD 21401-7307

(410) 573-4599



## PROJECT SUMMARY

Project Code: 2024-0072176

Project Name: Little Falls Parkway Road Diet

Project Type: Road/Hwy - Maintenance/Modification

Project Description: On Little Falls Parkway, between Arlington Road and Hillendale Avenue, unused asphalt will be permanently removed to shorten the crossing of Little Falls Parkway for users of the Capital Crescent Trail (CCT). A protected shared use path will be provided between Arlington Road and the Capital Crescent Trail crossing, enhancing community connectivity to the existing shared use path at the northern terminus of Little Falls Parkway. South of Hillendale Road to Dorset Avenue, all existing pavement is retained, and a buffered bike lane will be provided in the unused southbound drive lane. Low profile separators will be used to block off the unused drive lanes, which do not prevent usage by emergency vehicles when needed. Additional work will include safety enhancements at Arlington Road, Hillendale Road, and Dorset Avenue, improved signage, re-location of traffic signals, stormwater management, and accessibility improvements.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@38.97172625,-77.1000564705578,14z>



Counties: Montgomery County, Maryland

## ENDANGERED SPECIES ACT SPECIES

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## MAMMALS

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

## INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

## CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

## **IPAC USER CONTACT INFORMATION**

Agency: Private Entity  
Name: Marissa Brown  
Address: 11350 McCormick Rd  
City: Hunt Valley  
State: MD  
Zip: 21031  
Email: marissa@blackwaterenvironmentalgroup.com  
Phone: 4102527870

Little Falls Parkway  
M-NCPPC  
Montgomery County



## **Appendix E: Public Comment**

## **NOTES REGARDING COMMENTS RECEIVED DURING SCOPING PERIOD**

The purpose of “scoping” is to solicit information from interested agencies (including regulatory agencies) and the public to identify concerns, potential impacts, and possible alternative actions that the sponsoring agency should consider when preparing an Environmental Assessment. Comments from individuals or organizations indicating general support or opposition to a project are noted for the record.

As to those comments of a unique nature (i.e. raised by only a few commenters) and as a courtesy to readers, NCPC is providing a specific annotation to a section of the environmental assessment which may be responsive to the comment.

Comments which are wide ranging (i.e. covering multiple topics) are noted as such but not provided with annotated references.



# Feedback for Little Falls Parkway

April 1, 2024 10:04 am

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**Name:** Sharon Whitehouse

**Location:** Bethesda

**Date:** March 29, 2024

See response to attachments at end of appendix.

To Michael Weil:

I have attached comments here. Thank you for your consideration.

Best regards,

Sharon Whitehouse

[Attachment](#)

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**Name:** Leanne Tobias

**Location:** Bethesda, MD

**Date:** March 29, 2024

See Section 2.2 regarding purpose and need  
Comments are wide-ranging and addressed  
throughout the draft EA.

These comments on NCPC's Little Falls Parkway Environmental Assessment (EA) discuss the following points:

- The stated "Need" for the proposed Little Falls Parkway reconfiguration is highly questionable.
- The proposed 2024 reconfiguration plan does not materially improve safety on Little Falls Parkway relative to the road diet implemented in 2017, and in fact introduces or aggravates ongoing safety problems which are likely to swamp any anticipated benefits.
- The proposed reconfiguration does not materially improve connectivity and recreational opportunities in the area affected by the plan; again, the safety problems created by the plan are likely to outweigh any anticipated benefits.
- The proposed reconfiguration plan should be considered in the context of overwhelming community opposition, especially in the areas most affected by the plan.

The Stated "Need" for the Little Falls Parkway Reconfiguration is Highly Questionable

The "Need" for the Little Falls Parkway reconfiguration, as expressed by the Montgomery County Parks Department in its March 12, 2024 presentation to NCPC is highly questionable. The testimony of Parks Department representatives states that the "Need" is "[b]ased on a history of serious injury and fatal crashes between Capital Crescent Trail users and vehicles traveling along Little Falls Parkway, as well as policy objectives adopted by the Montgomery County Council and the Commission."

The language chosen by the Parks Department makes it sound as if there were many fatal or



serious crashes at the crossing by Little Falls Parkway and the Capital Crescent Trail. This has not been the case. A more detailed analysis of Montgomery County accident data reveals the following:

- There have been only three serious crashes and one fatality on Little Falls Parkway - a total of four incidents - in the eight years from 2015-2022, or an average of .5 incidents annually. As this suggests, Little Falls Parkway is well on the way to achieving Montgomery County's road safety goals (the elimination of fatalities and serious injuries by 2030), as articulated in the County's Vision Zero policy.

- While the single fatality on Little Falls Parkway occurred at the Capital Crescent Trail, the cause of that accident appears to have been mitigated effectively by a 2017 road diet that is largely unaffected by Parks' 2024 proposal for the Parkway.

- There have been no serious accidents at the intersection of Little Falls Parkway and the Capital Crescent Trail since implementation of the 2017 road diet. The single minor accident, involving a pedestrian, took place in 2022, after the Parks Department instituted Phase I of its plan expanding the road diet from Hillandale Road to Dorset Avenue. It is therefore unclear that permanently extending the Little Falls Parkway road diet south from Hillandale Road to Dorset Avenue will itself enhance safety at the intersection of Little Falls Parkway and the Capital Crescent Trail. The EA should therefore carefully examine the safety improvements proposed for the Capital Crescent Trail to ensure that safety is truly improved for Trail users, consistent with Montgomery County's Vision Zero goals.

- The overwhelming majority of the accidents along Little Falls Parkway have not taken place at the Capital Crescent Trail crossing. Instead, an estimated 67% of these accidents have occurred at intersections that are not the focus of the Parks Department's proposal for Little Falls Parkway (see below). The extent to which Parks' proposal will actually enhance safety for users of the Capital Crescent Trail should be evaluated further in the EA.

- The Parks Department's rationale for closing lanes between Hillandale Road and Dorset Avenue has shifted conspicuously over time. Public documents and testimony released by the Parks Department in 2022 and 2023 emphasized the desire to create a new "linear park" along Little Falls Parkway as the reason to narrow the roadway.

- It was only after being confronted by overwhelming public opposition to the linear park (see below), including the irrefutable observation that Little Falls Parkway is surrounded by abundant parkland, that the Parks Department shifted the "Need" focus of its proposal to public safety. In this context, it is notable that the Parks Department has not proposed less disruptive and widely supported mechanisms to improve safety on Little Falls Parkway, including speed bumps (already in use along Little Falls Parkway south of River Road), speed cameras and heightened enforcement of speed limits.

- It should be noted that the proposed plan affects only .4 miles of roadway and would create a new bike lane of less than .4 miles in length. As discussed below, connectivity between the proposed new bike lane and nearby recreational amenities is poor and poses safety problems. As this suggests, the benefits of the proposed Parkway are extremely limited, especially in light of the abundance of recreational space already adjacent to Little Falls Parkway.

In sum, the stated "Need" for the proposed reduction in vehicle lanes between Hillandale Road and Dorset Avenue is highly questionable and it is dubious that the proposal will materially improve safety conditions for area residents or for users of the Capital Crescent Trail. In

addition, the plan does little to improve connectivity to nearby recreational facilities, while posing numerous safety issues, as discussed below.

#### Conditions at Intersections from Arlington Road to Dorset Avenue

While the 2024 Parks proposal focuses on conditions along LFP between intersections, it should be noted that an estimated two-thirds of the collisions on Little Falls Parkway between Arlington Road to Dorset Avenue (the area of the 2017 and proposed 2024 road diets) occur at intersections. Between 2015 and 2022, 30 of the 45 collisions on Little Falls Parkway (67%) occurred at the Dorset Avenue, Hillandale Road and Arlington Road intersections:

- The intersection of Little Falls Parkway and Arlington Road has been most problematic – 16 minor and 1 serious crash there, with 5 bicyclists and 1 pedestrian involved in those incidents.
- The intersection of Little Falls Parkway and Dorset Avenue is another crash-prone area with 9 incidents between 2015-2022. Two of those crashes involved bicyclists, but all of the collisions resulted in minor injuries.
- The intersection of Little Falls Parkway and Hillandale Road was the site of 4 accidents.

Conditions on Hillandale Road are discussed in greater depth below.

The Park's Department proposal does not address these safety needs, a matter that should be evaluated in the EA. Because Parkway accidents are most prevalent at intersections, the EA should evaluate whether the 2024 Parks proposal sufficiently addresses safety needs in those areas.

#### Specific Safety Concerns about the Proposed Redesign of Little Falls Parkway

The following specific safety concerns cited in public testimony and at community meetings should be examined by NCPC in the EA:

1. Safety problems for southbound bicyclists where the proposed dual direction "Buffered Bike Lane" ends at Dorset Avenue. (The new bike lane would be installed in the southbound, westernmost lane of Little Falls Parkway from the Capital Crescent Trail to Dorset Avenue and would serve as an alternate route for bike riders coming southbound from Bradley Boulevard or for those riding north or south on the Capital Crescent Trail.)

a) To turn right from Little Falls Parkway and bike along to the Capital Crescent Trail, some 400 feet from the Parkway, is not a safe situation for bicyclists. Dorset Avenue at Little Falls Parkway is a major entrance/egress for vehicles into the Kenwood community. If bicyclists are encouraged to share 400' of roadway with cars by virtue of the proposed plan, this creates a major safety hazard. If a collision happens on this short segment of roadway, at some point the responsibility will fall to the Montgomery County of Transportation, not to the Parks Department.

b) Existing infrastructure is insufficient to ensure the safety of bicyclists attempting to access the Capital Crescent Trail via Dorset Avenue. Dorset Ave to the west of the Little Falls Parkway and then to the Capital Crescent Trail has lanes that are only about 12' wide – not wide enough for a bike lane. There is a sidewalk on the south side of Dorset Avenue, but it is only 47" wide before the driveway to Kenwood House Co-op Residences and shrinks to 44" thereafter. On the north side of Dorset Avenue, the path along a 43"-wide segment between the curb and private property is bisected by a driveway to several private homes, and is insufficient for the needs of

bicyclists. The insufficiency of existing infrastructure is heightened when one considers that sidewalks are expected to be shared by bicyclists and pedestrians.

2. Safety problems for southbound vehicle drivers at the right turn from Little Falls Parkway to Dorset Avenue. A driver turning right onto Dorset Avenue from the southbound lane of Little Falls Parkway may not be able to see a bicyclist, who will also be turning right to access the Capital Crescent Trail. At the scoping meeting, someone asked if a signal, specifically for bikes turning right into the Kenwood community could be installed. The response from Kyle Lukacs of the Parks Department was concerning, “As we get into detailed design, we’ll look at how bikes transition. . . . Bike signals can be challenging with right-turning cars, but we’ll look into making bike connectivity as safe and as well-functioning as possible (my italics).” The objective should be to make this transition safe—not a substandard “as safe as possible.” And safety should be for everyone – walkers, bikers and drivers. Anything less is an abrogation of responsibility by the Parks Department.

3. Inadequate directional signage differentiating the northbound middle lane for Little Falls Parkway from the right turn into the Somerset neighborhood at the intersection of Little Falls Parkway and Dorset Avenue. This flaw wrongly positions drivers who wish to proceed north along Little Falls Parkway, leading to greater accident risk.

4. The inability to make left-hand turns from both the northbound and southbound lanes at Little Falls Parkway and Dorset Avenue. These conditions increase the risk of accidents.

5. Inadequate turning radius for right turns from the east side of Dorset Avenue into northbound through traffic on Little Falls the parkway.

6. Inadequate differentiation for the proposed northbound emergency vehicle lane at Dorset Avenue. With only armadillo lane delineators and striping to distinguish the proposed northbound emergency lane, will drivers unfamiliar with the Parkway realize this is not a through lane? Will pedestrians realize this is not a walking path? These concerns need to be assessed in the EA.

7. Heightened potential for collisions in the vicinity of Little Falls Parkway and Hillandale Road deriving from the proposed removal of pavement on Little Falls Parkway in front of Bethesda Pool.

8. Heightened potential for collisions and conflict between walkers and vehicles at Little Falls Parkway near Hillandale Road due to the possible closure of entry and/or exit points because of the proposed road narrowing.

9. Insufficient parking for the Bethesda Pool, resulting in illegal parking on grassy areas. This already occurs on summer weekends along the grassy area by the pool on the north side of Hillandale Road. It is probable that people will do the same along the grassy area that the Parks Department proposes to install along Little Falls Parkway in the vicinity of Hillandale Road. This probability is likely to undercut any recreational value or connectivity improvements associated with the grassy area and may increase the risks of collisions between vehicles and pedestrians.

10. Need for better sidewalks between the north side of Arlington Road, the Bethesda Pool parking lot, Fairfax Drive and the Fairfax Court Apartments. Better sidewalks in these areas are needed to ensure better and easier connections for children and their parents to safely visit nearby parks and recreation facilities.

11. Need for a dedicated right-turn lane and a “No Right Turn on Red” sign from Little Falls Parkway to Arlington Road. Community members believe that these improvements would reduce the risk of accidents and protect pedestrians without impeding traffic flow.

NCPC Approval before Engineering Plans Completed?

NCPC has announced that it intends to accelerate the review process for the proposed Little Falls Parkway redesign. In light of the many outstanding safety issues, it is baffling that NCPC would seek to approve “50-75% of construction drawings” by the proposed action date in June. Isn’t it important for the Parks Department to get the issues of safety and connectivity 100% correct before the NCPC approves its plans?

As matters now stand, community organizations and the public would appreciate additional information about how the proposed changes by Montgomery Parks will be reviewed to determine if safety for all users – drivers, bicyclists and walkers will be assessed within a reasonable timeframe, both now and after changes are introduced.

Community Views of the Proposed Little Falls Parkway Redesign

NCPC’s EA assessment should be made in the context of public opinion on the proposed redesign of Little Falls Parkway. While members of the public hope that any changes will be successful, it is important to understand that community members are deeply disappointed and frustrated that the Parks Department, the Montgomery County Planning Board and the Montgomery County Council did not acknowledge that most residents in neighborhoods immediately served by the proposed project would prefer Little Falls Parkway to return to four lanes between Hillandale Road and Dorset Avenue, with the road diet by the Capital Crescent Trail retained for safety.

Residents see little or no need for a bike path measuring under four-tenths of a mile that does not smoothly and safely connect to the Capital Crescent Trail and do not agree with Parks’ statement that “Little Falls Parkway is not considered a means of principal conveyance, but (Parks) acknowledges that is an important road for people to travel back and forth in the area.” (Scoping Meeting, 15:58).

It is especially important to recognize that overwhelming community opposition to the narrowing of Little Falls Parkway between Hillandale Road and Dorset Avenue has been quantified in public comments collected by the Parks Department and the Montgomery County Council at the end of 2023.

As detailed in an analysis undertaken by the Citizens Coordinating Committee on Friendship Heights and supplied to NCPC under separate cover, 1251 unique respondents submitted 1272 comments to the County on the proposed Little Falls Parkway reconfiguration:

- 74.2% of the comments supported a return to a four-lane configuration along Little Falls Parkway between Hillandale Road and Dorset Avenue.
- 80.2% of respondents who live in adjoining zip codes – identified by Montgomery County as the primary users of Little Falls Parkway and nearby park facilities – supported a return to four lanes from Hillandale Road to Dorset Avenue.
- Commenters noted that the area surrounding Little Falls Parkway is already served by extensive recreational spaces that will not be materially improved by a significant reduction in road capacity in exchange for the addition of a bike lane measuring under four-tenths of a mile, as discussed below.

When Little Falls Parkway was developed with Capper-Cramton Act funds in the 1950’s

perhaps it was not meant to be a “principal conveyance,” but a park road to be enjoyed during a Sunday drive. In the 70 years since the roadway was built, the southwestern area of Bethesda has seen and will continue to see a substantial increase in development and Little Falls Parkway has become an essential connector road between downtown Bethesda and River Road (to head west to the Beltway) and Massachusetts Avenue (to head east to downtown Washington, DC). Little Falls Parkway also connects to parking for the Capital Crescent Trail, which opened in 1996, the parking lot at the Bethesda Pool and the parking lot at the Little Falls Stream Valley field just north of Arlington Road. The public has therefore continued to voice continued opposition to the permanent changes proposed by the Parks Department which detract from the safety and functionality of what was once a pleasant and convenient stretch of road serving diverse purposes.

## Conclusions

These comments document the following points:

- The “Need” cited by the Parks Department for the proposed redesign of Little Falls Parkway is highly questionable. Montgomery County accident data for 2015-2022 (the most recent publicly available statistics) refute the premise that the Parkway has a substantial recent history of fatalities and serious injuries.
- The 2024 reconfiguration plan proposed by the Parks Department does not materially improve safety on Little Falls Parkway relative to the road diet implemented in 2017, and in fact aggravates or creates ongoing safety problems which are likely to swamp any anticipated benefits.
- The proposed reconfiguration does not materially improve connectivity and recreational opportunities in the area affected by the plan; again, the safety problems created by the plan are likely to outweigh any anticipated benefits.
- The proposed reconfiguration plan should be considered in the context of overwhelming community opposition, especially in the immediately adjacent neighborhoods which the project is intended to serve.

-----  
**Name:** Jenny Sue Dunner

See Section 8.1 regarding plan consistency.

**Location:** Chevy Chase, Maryland

**Date:** March 29, 2024

The issue of safety is paramount, and should be strongly considered as this project is reviewed. Most of the citizens in the area believe the Parkway is more dangerous than before and certainly not the solution the general public wanted when Parks conducted a survey in 2018 regarding the crossing.

There is no Vision Zero on the neighboring streets, and there is considerably more traffic.

The intersection at Little Falls Parkway and Dorset Avenue is very dangerous with the bollards because there is a serious blind spot for cars turning from the Parkway onto Dorset Ave heading into Kenwood. If that corner of the road is removed and modified, presumably making

it easier for bikers to turn onto Dorset from the Parkway as they head to the Capital Crescent Trail, a new danger arises since there is not enough room for a bike and a car on that stretch of the road. Also, importantly, Dorset Avenue is not under the purview of the Parks Department; it is covered by the Department of Transportation.

It would also be costly to modify the right turn onto Dorset Ave from Little Falls Parkway since a traffic light would need to be moved.

It is irresponsible to not consider the already heavy (and ever increasing) traffic that is coming from Bethesda and Westbard, and Little Falls Parkway connects these busy areas. Citizens spend countless hours, days, weeks and months working with the Planning Department to develop Sector Plans and Master Plans and they are not being considered. Traffic is now backed up on the Parkway and with the development underway in Westbard, it is only going to get worse. The environment is not being considered either, as traffic increases and cars idling on the Parkway since it is no longer an easy pass through.

What used to be a beautiful, serene and pleasant stretch of road is now a confusing, plastic-ridden obstacle course.

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**Name:** Gloria Malkin

**Location:** Chevy Chase MD

Comment Noted

**Date:** March 29, 2024

I am writing again to request that the county restore Little Falls Parkway to its original design with two lanes of traffic in each direction, separated by the grass median. The only exception is for reduced lanes of traffic between Hillandale and Arlington Roads to enhance safe crossing on the capital crescent Trail.

There is significant traffic on the section between River Road and Arlington Road. That includes people driving to the public pool at the corner of Hillandale Road, widely used in summer months and year-round for access to the Capitol Crescent Trail; neighborhood traffic to schools; and emergency vehicles. The County's actions to close part of the parkway has been met with strong and strident opposition from residents in the surrounding neighborhoods. Their objective to provide biking and pedestrian paths ignores the fact that the road is already bordered on both sides by existing trails: the Crescent Trail, and a trail adjoining Norwood Park. The proposed \$600,000 would be much better spent on improving nearby Norwood Park, which has not had any improvements to the pathways, uneven ground or tennis courts, as well as improving other nearby parks in Bethesda.

Safety concerns are also misplaced. Although tragic, there has been only one fatal accident involving a cyclist and a car back in 2016. Minor vehicular accidents(30) have occurred primarily at the major intersection with the parkway and River Road, beyond the stretch of the Parkway under consideration.

Finally, I support the extensive comments submitted by Stacey Band on behalf of the Bradley House Condominium. Please listen to the thousands of residents in the community who have

submitted comments numerous times, and restore Little Falls Parkway to its original design which best meets the traffic and safety needs of the community.

Gloria Malkin

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**Name:** Richard Hoyer

**Location:** 101 Lucas Lane Bethesda, MD 20814

**Date:** March 29, 2024

See Section 8.8 regarding public health and safety

Dear Sirs,

I ask that the NCPC approve the plan to reconfigure Little Falls Parkway only with significant modifications. The plan as but forward by MNNCPPC is inadequate and unsafe.

1) the two-way travel lane configuration on one side of the median provides safety for car traffic and cyclists/ pedestrians unmatched by the design in the Park's submission.

I ask the NCPC to address these issues:

A) what is the increase in car speed for a two lane road divided by a wide median over a two lane road with double yellow centerline?

B) what safety design considerations provide for the safety of pedestrians using the marked off curb lane buffered by "turtles"?

C) what are the increased risk of car/bike crashes on the side of the parkway with the twoway bikevlane, buffered by "turtles"?

The current interim design in place provides a higher degree of safety than the design before the NCPC. A reduction in safety by the Park's proposed design is unwarranted. I ask that the NCPC approve only a design with the highest safety in a two lane configuration. I ask the NCPC to document the risks as I have outlined above.

I am a retired firefighter who has driven fire and rescue apparatus from the nearby fire stations regularly on little falls parkway as a four lane road. The parkway was over designed and under used in this format. Two lanes, separated only by a center line is a design that provides more than adequately for emergency response uses and provides a safer configuration for routine automobile circulation.

Thank you.

Richard Hoyer

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**Name:** Alison Gillespie  
**Location:** Silver Spring, MD  
**Date:** March 29, 2024

**Comment Noted**

I support the changing Little Falls Parkway. It is important to note that this road is in a PARK and that we need to prioritize safety of all who are using the park, not just a few neighbors who wish to drive fast when they please. It should also be noted that park lands belong to all, not just to those who live closest to them. I would like the bike lane to be more than just paint if it there. Paint will not protect people on bikes from cars. To my mind, this road change does not go far enough. If possible, MNCPPC should remove two of the four lanes for the entire throughfare of the park, and either convert the lanes into forest OR use the pavement for a linear park, per the first and best recommendation made by staff. Those changes should be permanent for the sake of both the environment and the commitment to Vision Zero. I am unhappy that this road will remain here with just this small change. It seems to me that elected officials including the councilmember who is from this district simply wanted to buy more time and leave the pavement so that one day they could reopen it again to four lanes of car traffic with no bike lane. We should be doing something permanent and large scale here to make this more open to those who want to use Little Falls park for something other than driving. Thanks for your time and consideration.

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**Name:** Phyllis R Edelman  
**Location:** Bethesda, MD  
**Date:** March 29, 2024

**Comment Noted**

Thank you for the opportunity to comment on the Little Falls Parkway Environmental Assessment.

I hope the NCPC will take into consideration all of the questions that were raised about traffic operations and safety for vehicles, bicyclists, and pedestrians during the Scoping Meeting on March 12, 2024 and will be detailed in other letters to you via the portal and by mail. They are too numerous for me to delineate all of them in this letter, but they refer to safety concerns regarding connectivity throughout the Little Falls Parkway area.

My greatest concern is about the dual direction bicycle path, which the Parks Department proposes along the southbound closed lane of the Parkway. As I have had considerable time to think about this, I am wondering why the Parks Department chose to develop a bicycle path instead of a pedestrian path. There are more pedestrians who use the Capital Crescent Trail than there are bikers according to information from the Capital Crescent Trail Board. Did the Parks Department consult with the CCT Board developing this plan? I would assume they didn't, just as they didn't consult with nearby communities in advance of their proposal to NCPC.

In addition, the connection at Dorset Avenue to the CCT, while not particularly accommodating



for pedestrians – there exists a narrow sidewalk on the south side of Dorset -- is friendlier to pedestrians than the connection, or lack thereof, for bicyclists. Bikers will have to turn right onto Dorset Avenue, sharing the road for several hundred feet with vehicles that are also using Dorset Avenue to get into or out of the Kenwood neighborhood. As we well know from experience, when you mix bike riders with autos on the same stretch of road, especially one that is a major entrance/egress for a neighborhood, it has the potential to result in a dangerous situation mostly for the bike riders, but also for drivers who may be unable to see or stop fast enough for a biker who turns onto the road from the trail.

While I assume that even the small removal of pavement along the pool parking lot on the northbound side of Little Falls Parkway will result in slightly better water quality for the stream, I am unaware of any environmental study the Parks Department did to justify the removal of the pavement. Neither has Parks explained how they will handle the flooding that occasionally occurs on the southbound side of Little Falls Parkway.

I am also concerned that since pedestrians will not be allowed either on the bike path on the southbound side of the Parkway, nor on road lane on the northbound side of the parkway reserved for emergency vehicles, that they will use both of those areas for walking. How does the Parks Department intend to stop pedestrian use on these two sections of the unused roadway?

Finally, it seems that the purpose of these changes and the need for them are not in alignment with what the Parks Department plans on doing. “Reducing the potential for collisions between autos and vulnerable roadway users on foot or bicycle who cross Little Falls Parkway,” was accomplished when the Parks Department instituted the road diet at the CCT in 2017.

The need expressed also mentions a “history of serious injury and fatal crashes between CCT users and vehicles traveling along Little Falls Parkway.” While I recognize the new arrangement at the CCT crossing will be considered a “permanent” change versus the “operational” change that was made previously, the closure of two lanes of Little Falls Parkway from Hillandale to Dorset does not seem warranted based upon either the purpose or need the Parks Department has written and was on Slide 13 of the Scoping Meeting presentation. Parks did not present any crash data that indicated any great need for limiting the roadway between Hillandale and Dorset. Neither did the Parks Department present any great need for an additional bicycle path vs. a pedestrian path with data that showed number of bicyclists vs. number of pedestrians who use the CCT from the LFP crossing down to Dorset Avenue.

After a summer’s evening out in Bethesda for dinner and a movie, driving on Little Falls Parkway from Arlington Road to River Road resulted in a magical few minutes. The Parkway was cooler and quieter than downtown Bethesda because of all the lush greenery surrounding it, and it provided a sense of calm before being rushed back into the traffic on River Road. Since the changes the Parks Department made in 2022, driving that same distance on Little Falls Parkway is now anxiety producing since Parks turned it into an obstacle course with bollards, flexsticks and lane changes. It is particularly nerve-wracking to drive at night with

lights from oncoming traffic coming at you. There is nothing calming or serene about the drive.

I hope that NCPC will at least steer the Parks Department towards providing some aesthetic relief from the chaos that is currently on the Parkway. I do not expect, however, that those magical minutes will ever occur again given the striping, armadillos and wooden fencing that will result with the current changes. These are changes that most nearby residents did not ask for, did not want and from our perspective, even after studying the crash data, do not need.

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**Name:** Robert Samis  
**Location:** Bethesda  
**Date:** March 29, 2024

**Comment Noted**

From: Robert Samis  
Email: rsamis@yahoo.com

It is encouraging the Moco and in particular MNCPPC are taking their primary responsibilities of ensuring the safety, health, and recreational environs. I reside in the area and have utilized this corridor as both a motorist, bicyclist, and pedestrian. The proposed reconfiguration is a welcome improvement which helps to restore the balance and primary purpose of our parklands.

As someone who has experienced a serious accident due to the careless driving of a motorist under non-busy roadway conditions during optimal conditions it is critical to provide improved and dedicated pathways to separate pedestrians and bicyclists from distr

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**Name:** Christopher P Arndt  
**Location:** Boyds  
**Date:** March 29, 2024

**Comment Noted**

The removal of the unused pavement on Little Falls Parkway must be removed, and this land should be converted into green parkland which is the intent and purpose of Little Falls Park. A dual lane highway never should have been built in this park. For pedestrian and cyclist safety the existing 2-land configuration is the best to ensure the most safety. Please implement the recommendation of the Parks Department. Your office has the last say on safety and the proper use of this park, not the County Council.

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**Name:** Maxine Lesniak  
**Location:** Chevy Chase, MD  
**Date:** March 29, 2024

**Comment Noted**

Question 1--Do any of the committee use the Little Falls PKY?

Fact -I have lived in this area (see address info) for 4 decades, now retired, paid my state & local taxes on time. I have walked on trails, before & after now ongoing construction of Purple Line. I have walked and continue to walk (all weather conditions) in Bethesda/Chevy Chase on sidewalks but presently now walking on bicycle lanes (to avoid brick side walks, very slippery in cold damp weather as well as loose bricks and/or growing tree roots). Note: On most days waking I find motorized bicycle/scooters, etc., using sidewalks, as well as some older adults bicycling, thus reasons for walking on current bicycle lanes which have no uneven separation (cement or brick) lines.

When I drive I use the Parkway. While all life is important , one bicycle's death a few years ago should NOT BE today's issue to change human walking, biking and driving on existing road/trail on the proposed . Other pedestrian death/injuries can and have been be addressed (see River Road & Georgetown Road recent changes). Please consider and reconsider your proposals based on experiences of pedestrians/drivers as well as needed space for fire engines, medical emergency vehicles etc.

Appreciate your attention to an actual active pedestrian, driver, tax payer.

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**Name:** Gary Oppenheim

**Location:** Bethesda MD

**Date:** March 29, 2024

Comment Noted

The parkway is a parkway, not a throughway, and should not be repurposed as a throughway. It should only be used to access park facilities, so there is no reason for it to have more than one lane in each direction at any point. I would even go so far as to suggest increased enforcement of it's parkway role, to prevent and prosecute it improper use by rat-running automobilists.

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**Name:** Catherine woods

**Location:** 4800 Chevy chase drive md 20815

**Date:** March 29, 2024

See Section 5.3 regarding alternatives considered but dismissed

I disagree to reconfigure a 0.4-mile section of Little Falls Parkway between north of Arlington Road and Dorset Avenue in Bethesda, Maryland, reducing the parkway from a four-lane, median-divided configuration to a two-lane, median-divided configuration. As you know if you frequent this corridor that the traffic stockpiles after Hillandale so most traffic now cuts through my neighborhood and my wait time from Chevy Chase Drive to turn on hillandale are long wait times. You are aware that a 70 something condo is being built at by the firehouse without adequate parking and westbard traffic. Please restore the parkway the way it was or build a bridge over little falls and stop wasting taxpayers money.

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**Name:** Maureen Shuler

**Location:** Chevy Chase, MD

**Date:** March 29, 2024

See Section 8.8 regarding public health and safety

Dear NCPC,

I am writing today on behalf of the Kenwood Citizens Association, regarding the modifications to the Little Falls Parkway. As changes are occurring in real-time, we would like to make our collective voices heard as the neighborhood that is more noticeably impacted due to our proximity to the parkway. I write to you in my capacity as the President of the Kenwood Citizens Association, and on behalf of our board who speaks for the 280 homes inside of our entrances.

As you are likely aware, our neighborhood has been significantly impacted by the realignment of Little Falls Parkway ("LFP"), and there have been significant safety concerns as a result.

1. The intersection at Dorset and LFP has become considerably more dangerous:
  - a. Now with the confusion of the roadway going from 4 lanes to 2 lanes, and the new configuration therein, the intersection has become very confusing (especially when it is dark)
  - b. The sidewalk along Dorset avenue leading to and from this intersection is extremely narrow, with no grass buffer between the roadway and walkway
  - c. The Capital Crescent trail intersection through this area leads to more congestion and potential confusion
  - d. There is a neighborhood park in the direct vicinity
2. The cut through traffic in our neighborhood has increased significantly as a result of the above mentioned confusion and congestion. We have experienced emergency vehicles coming down Kennedy Drive (a residential street with no sidewalks for pedestrians, and a park at the end).
3. There is considerable density in the coming years with many projects currently underway to provide housing units in Bethesda, Westbard, and the areas surrounding. The parks department has cited time and again a forward looking traffic simulation to take this into consideration, but we have seen no data that actually contributes to their findings. While it would be nice to believe everyone moving into these housing units will walk or ride their bicycles to get between the River Road corridor and Bethesda, it is simply not realistic. The simulation may show a dwindling number of cars on LFP, in which case there will undoubtedly be a growing amount of vehicular traffic and volume on our residential streets.

Our sincere hope, as you assess this situation, is that you are able to determine if the Little Falls Project as proposed by the Montgomery County, MD. Parks Department is consistent with park use, and provides a park benefit. So far, it does not appear to be consistent with either of these goals, and has lead to safety concerns for the citizens of the surrounding neighborhoods that are disproportionately negative vs. the potential "benefits" of closing these lanes - of which we can still see none.

While I have the ability to speak on behalf of our neighborhood of over 280 homes, we have also received over 5,400 signatures from your constituents who would also like the road to go back to the original configuration (and to be clear, this INCLUDES the road diet at the Capital Crescent Trail crossing). Your constituents are concerned about the amount of time, effort, and MONEY being spent on a project that is extremely divisive and opposed by the surrounding

communities.

Thank you for your time and consideration,

The Kenwood Citizens Association  
c/o Maureen Shuler

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**Name:** Barry Miller  
**Location:** Bethesda, MD  
**Date:** March 29, 2024

Comment Noted

I am a local resident and I believe the existing two-lane configuration is safer than the proposed divided highway. However, the proposal to leave the unused asphalt in place is not a proper use of park land. It should be converted to green space. Retaining a 28-foot-wide asphalt strip on each side of the median simply encourages dangerous, higher-speed driving. Complaints from other motor vehicle users that 2-lanes are not enough are unfounded. I also drive that section of roadway and the current status of one lane in each direction works fine!

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**Name:** Steven Friedman  
**Location:** Chevy Chase  
**Date:** March 29, 2024

Comment Noted

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving. Once LFP opens up to a four lane road, it's common to hear motorists drag race between Dorset and River Road. It's also common to see motorists speed up to go through the intersection even as the light on LFP turns red. Motorists also show blatant disregard for pedestrians crossing as they speed through red lights. I live one block off of LFP and walk and bike ride this area daily.

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**Name:** Stacey Band  
**Location:** Chevy Chase, MD  
**Date:** March 29, 2024

Comments are wide ranging and addressed throughout the draft EA. The unique issue raised relative to other comments is addressed in Section 8.5 regarding water quality and stormwater management

BEFORE THE NATIONAL CAPITAL PLANNING COMMISSION  
LITTLE FALLS PARKWAY IMPROVEMENTS  
COMMENTS ON ENVIRONMENTAL SCOPING

MARCH 29, 2024

## THE LOCAL ENVIRONMENT

The proposed Little Falls Parkway Improvement Project involves an approximately 0.4-mile section of the Little Falls Parkway. Overall, from south to north, the Little Falls Parkway (a) from Massachusetts Avenue to River Road is a two-lane road, with a series of three speed bumps; (b) from River Road to Dorset Avenue is a four-lane road, with the two north bound lanes separated from the two south bound lanes by a wide grass median; and (c) from Dorset Avenue to Arlington Road was a four-lane road and north of Arlington Road was a two-lane road to Fairfax Road, but this segment was modified by M-NCPPC/Montgomery Parks to a two-lane road diet at the Capital Crescent Trail crossing of the Parkway and in 2022 to two lanes in its entirety on an interim basis. There are no speed bumps on the Parkway north of River Road.

Montgomery Parks' application to National Capital Planning Commission (NCPC) pertains to the section of the Parkway from Dorset Avenue to Fairfax Road.

The Little Falls Parkway from Dorset Avenue to Fairfax Road serves multiple purposes. On the Parkway, there is blended traffic that includes people driving to the parking lots at the Bethesda pool and on the Parkway north of Arlington Road with their bicycles and getting on their bikes to go onto the Capital Crescent Trail, people driving to the parking lot north of Arlington Road to go to the soccer field (Stream Valley Park 2, Soccer Field 1), people driving to and from Bethesda.

Paralleling, approximately, the Little Falls Parkway between Dorset Avenue and the area of the Capital Crescent Trail crossing of the Parkway are two trails. To the west of the Parkway is the very popular Capital Crescent Trail. It crosses the Little Falls Parkway near the county's Bethesda pool and Dorset Avenue about 400 feet west of the Parkway. To the east of the Parkway is Montgomery Parks' Little Falls Trail. In this section, it begins near the corner of Dorset Avenue and the Little Falls Parkway and ends near Hillandale Road, to the east of the Bethesda Pool. It has a blacktop surface and is slated for repaving/repairs.

The Willett Branch runs south, essentially from Bethesda and flows into the Little Falls Branch south of River Road. In the immediate area of Montgomery Parks' proposed project, the main fork of the Willett Branch runs east of the Parkway, from south of Hillandale, under a Parkway bridge between Hillandale Road and Dorset Avenue and then to the west of the Parkway, and under Dorset Avenue between the Parkway and the Capital Crescent Trail. Another fork flows from west of the Parkway, through a culvert south of Hillandale Road and into the main fork. A local website shows the overall watershed, with the Willett Branch draining to the northern area. [<https://www.lfwa.org/explore>] In the area near the 0.4-mile section of Little Falls Parkway that Montgomery Parks seeks to modify, the Willett Branch resembles a concrete half pipe. That design likely is attributable to the large volume of water, from runoff that passes through it during storms. Unfortunately, the Willett Branch suffers a serious fecal bacteria problem. [ <https://www.lfwa.org/updates/area-stream-have-a-serious-fecal-bacteria-problem>] There are several significant recreational facilities in the area near the Little Falls Parkway. These include: the Capital Crescent Trail, the Bethesda pool, Stream Valley Park 2 (Soccer Field 1), and Norwood Park. A blacktop pathway connects Norwood Park to the Little Falls

Trail. Areas to the north and south of Little Falls Parkway are experiencing substantial and growing populations, but lack adequate, well-maintained parks. These areas that need additional parks/green space are Westbard and downtown Bethesda; specifically. It is recognized that efforts are underway for Caroline Freedland Park and the expansive Farm Women's Market project.

#### HISTORY OF LITTLE FALLS PARKWAY (2017-PRESENT)

In January 2017, bicyclist Ned Gaylin was struck and killed by motor vehicle on the Capital Crescent Trail crossing at the Little Falls Parkway. Thereafter, on an interim basis, Montgomery Parks instituted a "road diet" on the Little Falls Parkway at the crossing, closing off the outer lane in each direction.

In 2018, the Parks Department considered three alternatives for the Capital Crescent Trail crossing: (1) a bridge over the Little Falls Parkway, returning the Parkway to four lanes; (2) move the Capital Crescent Trail crossing to the intersection of Arlington Road and the Parkway where there was and is a traffic signal and returning the Parkway to four lanes; and (3) a permanent crosswalk with the road diet.

In June 2019, the Montgomery County Planning Board met and supported moving the crossing to the traffic signal at Arlington Road and opening the Parkway to four lanes, in coordination with County's Vision Zero plan. Some Planning Board Commissioners questioned that Parks Department's slanted cost analysis. That September, at a work session on the Parks budget for the County's Capital Improvements Program, the Planning Board voted to defer for 6 years the decision to move Capital Crescent Trail crossing to Arlington Road for budgetary reasons.

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic. On March 16, 2020 then President Trump issued guidelines urging people to avoid social gatherings of more than ten people and to restrict discretionary travel. With many people staying home, in April of 2020, the Parks Department closed the Parkway to vehicles 24/7 and initiated an Open Parkways program, for residents to walk outside with distance between families. As a result of the closure of the Little Falls Parkway, nearby communities including Kenwood (which lacks sidewalks) and Somerset, experienced significant and dangerous cut-through traffic.

In October 2021, Parks reopened the Little Falls Parkway from River Road to Arlington Road but only on weekdays. The road diet at the Capital Crescent Trail crossing continued in place. In the time period following mass vaccinations for COVID and a return to normalcy, Montgomery Parks seized upon converting some of the Little Falls Parkway roadway to a recreational use.

In a meeting in March 2022 with Montgomery County Councilmember Friedson, and representatives from several communities, the Parks Department acknowledged plans for closing part of Little Falls Parkway for a linear park. In about May of 2022, Parks implemented a so-called Phase I pilot project configuration, retaining the road diet at the Capital Crescent Trail crossing, and beyond that closing one lane each of the previous southbound and



northbound lanes while retaining the grass median between the operational lanes. In October of 2022, Montgomery Parks presented another fait accompli (consisted with its institutional practice of act first; create an appearance of public participation later), with this announcement:

October 10, 2022

Announcements & News, Press Releases

The project aims to develop a linear park on two lanes of the four-lane parkway.

WHEATON, Md. – Montgomery Parks([opens in a new tab](#)), part of The Maryland-National Capital Park and Planning Commission, will again reconfigure lanes on Little Falls Parkway([opens in a new tab](#)) for Phase Two of the pilot project ([opens in a new tab](#)) to repurpose two lanes of the parkway between Arlington Road and Dorset Avenue and create a linear park. Work is scheduled to begin on Monday, October 17, 2022. The new park will add much-needed recreational space in an area where land is at a premium, and adjacent to the Capital Crescent Trail – one of the most popular trails in Montgomery Parks’ system. . . .

On its website Parks said “Why is this being done?” Its answer was in part that “[i]n Phase 2, the capacity of the road will remain as it is under the current pilot project as a two-lane road, but the shifting of lanes will free up space to create a linear park.”

[<https://montgomeryparks.org/projects/directory/little-falls-pilotproject/>](emphasis added). Figure 13 (p. 14) of Parks’ Memorandum, “Pilot Project Phase II Typical Section” shows the previous southbound lanes closed and a “Linear Park” there. March 30 Memorandum to the Planning Board p. 14; see Appendix D to the Montgomery County Planning Board Agenda of March 30, 2023, Linear Park Concept Exhibits including an overhead aerial map and images of people at a park.

There was a huge outcry of public distress over Parks’ actions, including the closure of the Parkway that led to cut-through traffic in neighborhoods (with children, without sidewalks) and the lane reductions. And, there was massive public opposition to the unneeded linear park.

At long last, in the spring of 2023, the Montgomery County Planning Board held a hearing on the Little Falls Parkway.

Before the Planning Board, there was unrefuted testimony relating to the purpose of the Parks Department’s project. Malcolm O’Hagen from the Kenwood community testified: “I asked the question (of the Parks Dept), what is the problem you are trying to solve”, Parks replied “there is no problem, we are doing this because some people would like to see more park area”.

March 30, 2023, Hour 10:23:28.

By this hearing, the Parks Department did a switcheroo. It concocted a new purported justification for the Phase 2 reduction of the Parkway to two adjacent lanes, one lane in each direction, without the median between them; it wrapped itself in the flag of safety - speeding. There was no discussion of the road between Dorset Avenue and Hillandale Road as a no access divided highway, and no analysis of past crashes between Dorset Avenue and Hillandale Road (very few; none fatal), and no effort to reduce speeding by measures such as speed bump; which exist on the Parkway south of River Road. There had not been enforcement such as



police enforcement or speed cameras.

The Planning Board approved Parks' plan for the 0.4-mile segment of the Parkway, with some suggested adjustments.

The Montgomery County Council received an enormous volume of well-founded complaints from residents about and opposing Parks' Little Falls Parkway project. This included a petition which has grown to over 5,500 signatures and thousands of emails from concerned residents. It took up the matter at a Council session on May 8, 2023. The Council voted 10-1 to in favor of an amendment to M-NCPPC's FY-2024 capital budget relating to construction of a permanent road diet and the creation of a linear park along the closed traffic lanes, without Council review and approval:

Any realignment of the remaining two lanes between Dorset and Arlington on Little Falls Parkway must be reviewed by the Council before funds may be used for this purpose. No funds may be used for the implementation of a linear park in this section of the Little Falls Parkway. Montgomery Parks returned to the Montgomery County Council in November of 2023. At the Council's request, Parks presented two options to the Council's Planning, Parks, and Housing Committee, referred to as: (1) the Planning Board - approved configuration, a two-lane Little Falls Parkway from Dorset Avenue to Arlington Road with both lanes adjoining one another on the west side of the previously established median and a (2) Council-Requested Alternative Option that retained the grass median between the northbound and southbound lanes of the Parkway, as it existed before October of 2022. The Council Committee recommended the latter alternative with the grass median between lanes.

On January 23, 2024, the Montgomery County Council approved the configuration of a two-lane Parkway north of Dorset Avenue with the two lanes separated by the well-established and long-existing grass median and retention of pavement of closed lanes.

## PURPOSE AND NEED

A statement of purpose and need was included at slide 13 of NCPC's scoping session on March 12, 2024. It said:

Purpose: to reduce the potential for collisions between autos and vulnerable roadway users on foot or bicycle who cross Little Falls Parkway.

Need: based on a history of serious injury and fatal crashes between Capital Crescent Trail users and vehicles travelling along Little Falls Parkway, as well as policy objectives adopted by the Montgomery County Council and the Commission. [Source: <https://www.ncpc.gov/videos/623/>]

This statement of purpose and need must be rewritten. Among its many shortcomings, it is too narrow, as the purpose focuses only on "cross[ing] the Little Falls Parkway"; the need is based only on "serious injury and fatal crashes between Capital Crescent Trail users and vehicles

travelling along Little Falls Parkway” in addition to an opaque reference to unspecified policy objectives.

Based on the political resolution, but not the data or sound analysis, I am resigned to the Little Falls Parkway, between Dorset Avenue and Fairfax Road, becoming a two-lane, divided by a wide grass median, road with a refuge island at the Capital Crescent Trail crossing, for the immediate future. Like thousands of other local residents, I believe that the safety problem was solved by a road diet at the Capital Crescent Trail crossing, and this project is a continued waste of money – funds that should be used for parks in Bethesda or Westbard, where there are significant shortages of parks. It is my sincere hope that NCPC will address this concern and identify how to restore Little Falls Parkway WITHOUT spending the proposed \$600k+.

There are aspects of this proposed project that, for safety reasons, require analysis and adjustments through the EA. The two-lane configuration and other improvements proposed by Montgomery Parks introduce many safety issues that must be addressed. The purpose, I propose, is: to improve the safety of the Little Falls Parkway, including the roadway and non-vehicle pathways, and connections to it between Dorset Avenue and Fairfax Road. The need is: based on reports of safety-related problems, including at the Capital Crescent Trail crossing and at intersections, improvements to the road and non-vehicle pathways, that do not have undesirable consequences.

#### RESOURCES LIKELY TO BE IMPACTED BY THE PROPOSED ACTION

These include:

Safety/Traffic Safety

Bicyclist and Pedestrian Safety

Motor vehicle safety

Recreation (including associated safety)

Bethesda County Pool, vehicles traffic including parking, pedestrians and bicyclists including children

Capital Crescent Trail, a recreational resource

Little Falls Stream Valley Park 2 Parking Lot connection to Capital Crescent Trail

Proposed (by Montgomery Parks) protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and buffered bike lane from Capital Crescent Trail to Dorset Avenue

Little Falls Trail

#### POTENTIAL IMPACTS THAT ARE LIKELY TO RESULT FROM THE PROPOSED ACTION

#### TRAFFIC SAFETY, INCLUDING PEDESTRIANS AND BICYCLISTS

The Environmental Assessment (EA) should address traffic safety concerns, and in so doing,

include both a full rendering of data and a description of credible experiences that, although may not have resulted in deadly crashes, demonstrate dangerous conditions.

M-NCPPC's Planning Department and County employees have data bases of crashes in Montgomery County. A group of data bases includes crash reporting, crash reporting- drivers data and crash reporting-non motorist data. See [\[https://data.montgomerycountymd.gov/Public-Safety/Crash-Reporting-Incidents-Data/bhju-22kf/about\\_data\]](https://data.montgomerycountymd.gov/Public-Safety/Crash-Reporting-Incidents-Data/bhju-22kf/about_data) One of these is a huge spreadsheet in which one clicks on actions then query data into which select criteria can be entered, but this is difficult to use with an assurance of completeness and accurately, if not practiced in using this resource.

Another data base is an interactive crash map that covers 5 years, only up to 2022. As stated in the Planning Department's interactive crash map website, to achieve the ambitious goal of vision zero, we must understand our crash history and the conditions that lead to crashes on our highways. [Montgomery County Interactive Crash Map (2015-2020) ([arcgis.com](https://arcgis.com))] The interactive map allows the isolation of crashes by severity and by what was involved (vehicle to vehicle, bicycle, pedestrian). Data presented below, which are indicative of crash history, are derived from the Planning Department interactive map, which does not include recent data (2022 to present), and warrants updating by the Little Falls Parkway project applicant, using the larger data bases.

In addition to data, local residents have offered numerous important observations and identified significant problems that they have observed and experience. Some of these were presented to the Planning Board and others, were able captured in videos that were presented and made available to Montgomery Parks' staff.

Safety of users- pedestrians, joggers and bicyclists - of the Capital Crescent Trail as it crosses the Little Falls Parkway.

The EA should discuss the current and anticipated use of the Capital Crescent Trail at and near the Little Falls Parkway, the potential impacts of the alternative(s), and proposed measures, if any, to avoid or reduce adverse impacts to the Trail's users. The safety of Trail users has been and remains a key concern. The EA should present and discuss data on crashes, death(s) and injuries, and previous assessments by Montgomery Parks. The EA should address the human factors problems with the current absence of a safety refuge island in the Capital Crescent Trail between the northbound lane and southbound lane of the Little Falls Parkway. And, given the numbers of Trail users, it should discuss the need for a substantial refuge island.

As to fatal crashes, the crash history based on the Planning Department's interactive map, reveals one fatal crash in the Capital Crescent Trail crossing of the Little Falls Parkway: Ned Gaylin in 2016. That occurred before the road diet, which many supported its' construction. Otherwise, there have been no severe crashes. In the interactive map, under isolate pedestrian crashes, there was one on the Parkway at the Capital Crescent Trail crossing (12/1/2022).

Safety of intersection of Little Falls Parkway and Arlington Road.

The EA should discuss the safety of intersection of Little Falls Parkway and Arlington Road, under at least several scenarios. These include the most recent NCPC-approved four-lane Parkway configuration, changes made to-date since then, the proposal before the NCPC and some right turn lane options, including different depths.

The EA should discuss crash data and previous assessments by Montgomery Parks. In this regard, as to severe crashes, the interactive map reveals one severe crash of vehicles with a suspected or actual severe injury at the Arlington Road and Little Falls Parkway intersection (August 17, 2022).

It bears noting that most of the crashes on the 0.4-mile segment of Little Falls Parkway under consideration have been at intersections, primarily at Arlington Road and the Little Falls Parkway. As to this intersection, using the interactive map, under isolate pedestrian crashes: on the Parkway there were several that were not severe (one north of Arlington, 8/13/18, and two at Arlington, 12/10/18, 8/12/19). Under isolate bicycle crashes, there were five (5) that were not severe at the Arlington Road intersection, 10/20/15, 5/8/16, 8/10/16, 11/7/16, 2/19/18. There was one just south of Arlington Road and north of the Trail crossing (9/8/16). Under isolate crashes involving only vehicles, apart from the 8/17/22 severe crash noted above, there were ten (10) non-severe crashes at or near the intersection of the Parkway and Arlington Road (1/10/15, 1/24/15, 6/20/25, 10/6/15, 10/29/26, 11/30/15, 1/8/16, 3/25/17, 6/30/22, 8/17/22). To put it in perspective, the data bases show many hundreds of thousands of crashes in the County and 30 on the Little Falls Parkway from Massachusetts Avenue north to the Parkway's terminus.

Safety of segment of Little Falls Parkway between Hillendale Road and Dorset Avenue

The EA should discuss the safety of the Little Falls Parkway between Hillendale Road and Dorset Avenue.

Based on the Planning Department interactive map, as to severe crashes, the crash history of Little Falls Parkway between Arlington Road and Dorset Avenue amounts to one non-intersection crash involving a bicyclist south/southbound of Hillendale on Little Falls Parkway (July 14, 2019). In addition, under isolate bicycle crashes, on the Parkway there was one south of Hillendale, 4/16/16; under isolate crashes involving only vehicles, one south of Hillendale (1/18/20).

The temporary crossover north of Dorset Avenue, which is slated for removal as part of the proposed project, presents significant safety issues; specifically at night due to a lack of reflective material and during inclement weather.

Safety of intersection of Little Falls Parkway and Dorset Avenue and the area of the Parkway

north of that intersection.

The EA should discuss the safety of intersection of Little Falls Parkway and Dorset Avenue, under at least several scenarios. These include the most recent NCPC-approved Parkway configuration, changes made to-date since then, the two-lane County Council proposal before the NCPC, the safety problems encountered by northbound vehicles on the Parkway turning left into Dorset Avenue (toward Kenwood), the safety problems encountered by southbound vehicles on the Parkway turning left into Dorset Avenue (toward Somerset), and the safety problems encountered by westbound vehicles on Dorset Avenue turning right onto the Parkway (to go north toward the Bethesda pool).

As noted above, most of the crashes on the 0.4-mile segment of the Little Falls Parkway happen at intersections, with the second most occurring at or near the intersection of Little Falls Parkway and Dorset Avenue. Based on the Planning Department interactive map, under isolate bicycle crashes, there were two at the intersection of the Parkway and Dorset (1/24/20 and 2/24/21). Under isolate crashes involving only vehicles, there were seven (7) at or near the intersection of the Parkway and Dorset (2/15/15, 12/9/15, 12/15/15, 12/23/16, 8/21/17, 10/26/17, 3/26/18).

It can fairly be said that, this intersection is an unmitigated misfortune that may aptly be described as an “accident waiting to happen.” The past problems that drivers faced are compounded by lane reductions going (south to north) from four lanes to two lanes and by difficulties encountered in making, primarily, left turns off the Parkway. At a March 19, 2024 public meeting on the Parkway at Somerset Elementary School; which was recorded by Montgomery Parks’ trail planner Kyle Lukacs (whose participation along with Andrew Tsai, was appreciated), local residents described dangerous situations in making left hand turns from the Parkway’s northbound and southbound lanes onto Dorset Avenue, with the absence of dedicated turning lanes and arrows. One resident described the problem in making a right hand turn from Dorset Avenue going north onto the Parkway. There are other problems -- with the proposed bike lane at Dorset; which are described below.

## SAFETY TO RECREATIONAL USERS IN AND ADJOINING THE AREAS IMPACTED BY THE PROPOSED PROJECT

### Safety of Bethesda Pool Traffic and Parking Lot

The EA should discuss traffic safety at the Bethesda pool. The EA should at a minimum discuss the alternatives of two-way traffic into the pool parking lot from the Parkway, one way traffic into the parking lot from the Parkway, one way traffic from the lot onto the Parkway, and the impacts of changes to the Parkway entrance/exit on traffic onto Hillandale Road, including turns into the pool parking lot from Hillandale Road.

Montgomery Parks’ proposal would modify the ingress/egress from/to the Little Falls Parkway to the County’s Bethesda pool parking lot; which is relatively small and far from ideally

configured. The proposal would impact not only that area but it would also have an indirect impact on the traffic flow into the pool lot, including from Hillandale Road. The pool is heavily used in the summer, particularly on weekends. In the summer, there are swim meets on Wednesday nights that run past dark. [<https://www.bebarracudas.org/types-of-meets>] In the parking lot, there are children dashing out on foot, on bicycles and scooters. Parking lots are anything, but inherently safe. In Montgomery County, 22% of the pedestrian-related collisions occur in parking lots.

[[https://www.montgomerycountymd.gov/DOT-PedSafety/Resource/Parking\\_Lot\\_Safety.html](https://www.montgomerycountymd.gov/DOT-PedSafety/Resource/Parking_Lot_Safety.html)] The pool parking lot is used year-round by motorists who park there and then go by foot or bicycle onto the Capital Crescent Trail. The interactive data base shows one crash at the Bethesda pool (7/16/17).

### Safety of Connection of Little Falls Stream Valley Park Parking Lot to the Capital Crescent Trail

The EA should discuss pedestrian safety in travelling from Montgomery Parks' parking lot on the Parkway north of Arlington Road to the Capital Crescent Trail. Montgomery Parks' parking lot appears at the far left, lower part of the page in the drawing Appendix A Little Falls Parkway - Arlington Road to Dorset Avenue (Updated based on 11/27/23 PHP Committee Meeting, which is after page 14 of the Project Plan, linked on the NCPC website.

The Project Plan drawing shows pavement removal between that parking lot and Little Falls Parkway, both between and entrance to the parking lot and Arlington Road, and north of that entrance, as well as a pathway on the east side of the Parkway from Arlington Road to the Capital Crescent Trail. This (in blue) is not labeled on the drawing, unfortunately.

This parking lot on the Parkway is used heavily in the summer by users of the Bethesda pool including on Wednesday night swim meets. It is used year year-round by motorists who park and then go by foot or bicycle onto the Capital Crescent Trail. And it is used, particularly in the spring and fall, by parents of children practicing soccer in the field to the east and uphill of the lot. [<https://msisoccer.org/fields-of-play>] and [<https://rainoutline.com/search/extension/3015795610/78> ]

The EA should evaluate the connections from the parking lot to the Trail for safety purposes and consider alternatives, including whether the pathway should be separated from the road by a vegetative buffer and what the pathway should be made of. Our county has a Pedestrian Master Plan, prepared by M-NCPPC's Planning Department; which should be consulted. The pathway should be high comfort under that Plan.

Safety of the protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and buffered bike lane from Capital Crescent Trail to Dorset Ave in former right, southbound lane of Little Falls Parkway

The EA should evaluate the safety and utility of both the protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and the buffered bike lane from Capital Crescent Trail to Dorset Ave in former right, southbound lane of Little Falls Parkway. It should consider alternative safety mechanisms to and within the proposed six-foot-wide buffer zone of the (buffered) Bike Lane from the Capital Crescent Trail to Dorset Avenue. In addition, the EA should evaluate the safety of right turns from the buffered bike lane, at its terminus, eastward onto Dorset Avenue.

Montgomery Parks' proposal would repurpose the right southbound lane of the Parkway for use by bicyclists and north of Arlington Road, also for use by pedestrians. The Project Plan Drawing shows from the north to the Capital Crescent Trail, a "PROTECTED SHARED USE PATH CONNECTION TO CAPITAL CRESCENT TRAIL." That separated from the roadway by a four-foot buffer; in the buffer would be structural "Trail Barrier Separation.". The drawing also shows a "BUFFERED BIKE LANE FROM CAPITAL CRESCENT TRAIL TO DORSET AVE." For purported safety, the bike lane would be separated from the road by a 6-foot-wide buffer; in the buffer would be "LOW PROFILE IMPROVEMENTS LANE SEPARATORS." Parks' proposed typical section has a somewhat different description - a "LOW PROFILE LANE SEPARATOR AND/OR REFLECTORS."

There is a bit of history related to the Buffered Bike Lane, which involves use of the former and to be repurposed southbound lane by the Fire and Rescue service. Their rescue vehicles could readily move over a low curb, which I propose, apparently due to bureaucratic rigidity relating to an ideal world that Fire and Rescue commonly operate outside of, but do not want to do so there. Secondly, regarding the low profile lane separator and/or reflectors; reflectors should be rejected and a combination of low-profile lane separators and rumble strips (also known as sleeper lines or alert strips) should be considered. In as much as the buffered bike lane is proposed, rather than existing, there is not a crash history on the proposed path.

Some would like connectivity from the southern terminus of the Buffered Bike Lane via Dorset Avenue to the Capital Crescent Trail. That may occur. But as discussed at the public meeting at Somerset School on March 19, 2024, a right hand turn from the proposed Buffered Bike Lane from Capital Crescent Trail to Dorset Ave. is not without significant problems that need to be considered. Dorset Avenue to the west of the Parkway is relatively narrow. There is no sidewalk on the northern side of Dorset Avenue. On the southern side there is a narrow (less than 4 feet) sidewalk. Safety enhancements need to be addressed.

As to the need for and likely use of the Buffered Bike Lane, recent data are not supportive. A count earlier this year, after pandemic era use had cratered, and when both former southbound lanes of the Parkway were unavailable to motor vehicle traffic (under the Phase II configuration, all traffic was on the former northbound lanes), revealed very low usage of unused lanes of the Parkway by pedestrians and bicyclists:

Little Falls Parkway users other than motor vehicles Counts of walkers/joggers/runners/cyclists on the Little Falls Parkway on 1/10/2024.

Location of counts/people counted: counts were of people on the Parkway crossing in front of the Bethesda pool. Human counters sat in their motor vehicles, in the Bethesda Pool parking lot, facing the Little Fall Parkway. If a counter noticed that an individual crossed in front of the counter more than once, that person was counted as one user.

Time period 7:52 a.m. - 4:30 p.m.

Number of walkers/joggers/runners 25

Number of cyclists 5

This is entirely understandable. The closed lanes of the Parkway are a form of “road to nowhere”, sometimes terminating at an undesirable ride on Dorset Avenue and on that to the Capital Crescent Trail.

Apart from how this reflects on “Need,” it reveals that pedestrians would likely walk in the Buffered Bike Lane, but numbers of potentially impacted people would not be high.

Safety related to Little Falls Trail

The EA should evaluate the safety of the Little Falls Trail at the intersection of Little Falls Parkway and Dorset Avenue and at Hillandale Road. Connectivity to the pool is important and less than ideal.

Respectfully submitted on behalf of Bradley House Condominiums,

Stacey Band, Vice President of Community Relations, Bradley House Condominiums

Staceydewolf@gmail.com

20815

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**Name:** Stu Simon

**Location:** Chevy Chase

**Date:** March 29, 2024

Comment Noted

Please maximize the Greenspan and bike lanes along Little Falls and create a safe linkage to Hillandale Road. The Capital Crescent Trail paralleling this stretch of road is way too crowded with people to be safely biked.

---

**Name:** W Chan

**Location:** Bethesda, MD

**Date:** March 28, 2024

Comment Noted



Parks are for people and I urge the National Capital Planning Commission (the Commission) to maintain the current configuration of the Little Falls Parkway (LFP) between Dorset and Arlington Road (i.e. LFP Linear Park). The current configuration with both vehicle lanes on the northern side of the median is safer than the proposed reconfiguration, as shown by Montgomery County Parks data, and has reduced/eliminated incidents between vehicles and active park users. Having a lane on each side of the median will only increase speeds of vehicles passing through the park.

Making the LFP safer increases the accessibility for able as well as less able active park users including those who access the Bethesda Pool and the recreational grounds and nearby playground. For over 10 years, my family and I have used the LFP and the Capitol Crescent Trail (CCT) 6 to 7 days a week. We have witnessed the improved safety from the current configuration and the LFP Linear Park.

The Commission should be aware that Dr. Ned Gaylin, 81, was killed at the LFP crossing with the CCT before the road reduction was implemented. From my attendance at Montgomery County Park townhall meetings, those against the road diet were only concerned with how quickly they could pass through the park and not how they could use the park. Parks are for people and should not be highways. Dr. Gaylin's life is worth more than potentially a few seconds of delay to drivers passing through the park. We should not sacrifice safety for convenience and having a lane on each side of the median increases speed and reduces safety.

The LFP Linear Park services the residents of the entire National Capital area and should not be considered proprietary to the neighborhoods adjacent to the LFP. Bethesda has increased housing dramatically for those with moderate incomes by requiring 15% of new apartment/condominium units to be moderately priced. Our newest neighbors with families or senior citizens need park space. Unlike residents of Norwood, Somerset and Chevy Chase where single family zoning is enforced, apartments do not have front and backyards for recreation. So many children have learned to ride their bicycles and skate board on the LFP Linear Park even before any permanent improvements have been made. Parks are for people.

Allowing parkways to become freeways was one of the great planning mistakes of the 20th century. Perhaps the lack of safe pedestrian access was a design feature to limit use of the park and its amenities to those who could afford cars. We need to fix this discriminatory legacy by increasing park space and increasing safety and thus accessibility along the LFP.

For members of the Commission who are not familiar with the use of the LFP, I attach a PDF of photos that I've taken over the years of the LFP and its users. Notice in the second photo that the green Little Falls Parkway hiking and bicycling sign refers to using the shoulder of the roadway. This is dangerous and is a legacy which must be fixed permanently.

It's time to permanently change the LFP to include the linear park to increase park space and provide safe access for people of all ages and abilities. Aren't parks for people?

Thanks for your consideration.

W Chan

[Attachment](#)

-----  
**Name:** Harry Kruglik  
**Location:** Kensington  
**Date:** March 28, 2024

**Comment Noted**

As a bicyclist who uses LFP occasionally, I hope you will prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into forest. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving

-----  
**Name:** Avni G  
**Location:** Bethesda, MD  
**Date:** March 28, 2024

**Comment Noted**

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with the removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of parkland and its retention invites dangerous, high-speed driving

-----  
**Name:** Michael Heaney  
**Location:** Silver Spring, MD  
**Date:** March 28, 2024

**Comment Noted**

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

-----  
**Name:** Margaret Hennessey  
**Location:** Washington, DC  
**Date:** March 28, 2024

**See Section 8.5 regarding community facilities**

The signs near the pool give inadequate notice of the narrow lane configuration so drivers are surprised that we have only one lane in each direction. At intersection with Arlington Road there is a bottleneck so cars seeking to drive through must await the OK for cars turning right.

With pool traffic, people driving to Bethesda and beyond, and those wanting to park to use the trail, there is need for another lane or some accommodation.

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**Name:** John D Wise  
**Location:** Silver Spring  
**Date:** March 28, 2024

Comment Noted

I'm a daily user of the CCT for commuting to work. I support the safety improvements and I support restoring the unused roadway to park use. Thank you

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**Name:** Mary  
**Location:** Bethesda  
**Date:** March 28, 2024

Comment Noted

Please keep the road at two lanes: one in each direction.

Safety must come first!

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**Name:** Gregory Robison  
**Location:** Bethesda  
**Date:** March 28, 2024

Comment Noted

I am a frequent user (walker) of the Capital Crescent Trail and welcomed the increase safety of prioritizing the Trail over traffic where it crosses the Little Falls Parkway at the Bethesda Pool. I'm a driver, too, along this stretch of road, and have never felt unduly inconvenienced by the reduction to one lane at this point. I do hope that this stretch of road does not revert to car traffic!

I also draw and sketch in this area. Lower traffic is good for that, too!

[Attachment](#)

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**Name:** Andrea Cimino  
**Location:** Kensington  
**Date:** March 28, 2024

Comment Noted

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

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**Name:** Ryan Knight

**Location:** Bethesda  
**Date:** March 28, 2024

Comment Noted

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

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**Name:** Montgomery County Executive Marc Elrich  
**Location:** Montgomery County, MD  
**Date:** March 28, 2024

See response to attachments at end of appendix

Please see attachment, and also can email to: [john.kudel@montgomerycountymd.gov](mailto:john.kudel@montgomerycountymd.gov)

[Attachment](#)

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**Name:** Alan Rhinesmith  
**Location:** Potomac, Maryland  
**Date:** March 28, 2024

Comment Noted

As a bike rider and occasional user of the Capital Crescent Trail, I am well aware of the intersection of the trail and Little Falls Parkway. While the narrowing of the traffic lanes on the Parkway has improved the bike safety situation, one still needs to be very cautious there. I would certainly oppose any changes that could result in greater traffic flow and/or increased vehicle speeds through that intersection.

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**Name:** Ozerk Aslan  
**Location:** Bethesda, MD  
**Date:** March 28, 2024

Comment Noted

Dear Representatives,  
Sincere thanks for making the Little Falls Parkway safer and greener. The unused asphalt from the earlier configuration invites dangerous and high speed driving. Please convert the existing asphalt into green parkland for the best use of the park land for the surrounding community and natural preservation.  
Best regards,  
Ozerk Aslan

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**Name:** Sarah Colon

**Location:** Chevy Chase, MD 20815

**Date:** March 28, 2024

**Comment Noted**

Hello,

I have been using the CCT for 20 years for cycling to work in DC and have witnessed numerous accidents first hand. There are also many speeding drivers who don't even realize there is a bike/pedestrian pathway that crosses Little Falls Parkway by the pool. I ask that you please please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

PLEASE also put up a button (similar to the crossing on Bradley Blvd by Strathmore Street) which pedestrians can push to activate a flashing yellow light. This will greatly improve the safety of pedestrians crossing Little Falls Parkway when walking along the CCT. The conversion of the unused section of Little Falls parkway into a greenway will further open the way for safe and healthy opportunities for local residents to relax, move, and socialize.

Thank you.

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**Name:** Sarah Newman

**Location:** Washington DC

**Date:** March 28, 2024

**Comment Noted**

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving. Green > asphalt!

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**Name:** Solomon Mammo

**Location:** Bethesda and Silver Spring, Maryland

**Date:** March 28, 2024

**Comment Noted**

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

Tens of thousands of citizens use our public parklands, walking and biking trails, and green spaces on a daily basis. And our safety and well being must be addressed immediately!

Thanks and best regards,

Solomon

28March2024

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**Name:** Mario Gobbo

**Location:** Somerset (Chevy Chase), MD

**Date:** March 28, 2024

**Comment Noted**

Dear Sirs,

I am very much in favor of keeping Little Falls Parkway as a two lane street and turn the other two lanes into a walking and biking area. This not only because I believe in traffic calming measures and more green space for all of us neighbors, but also because of safety concerns. With two lanes, LFP will have slower traffic and less incidents at the trail crossing.

Best regards,

Mario

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**Name:** Barry Goldfarb

**Location:** SILVER SPRING, MD

**Date:** March 28, 2024

**Comment Noted**

I support green space in the Little Falls Parkway Improvements project and favor the removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Green space is much more environmentally friendly than asphalt paving with its increased runoff and heat island effects.

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**Name:** Jacob Barker

**Location:** Takoma Park, MD

**Date:** March 28, 2024

**Comment Noted**

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

We need to drastically expand facilities that both encourage active modalities and prioritize safety of all road users. Slower speeds save lives, and to that end, the roadway should be a two way road without a diving median to encourage drivers to want to drive slower.

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**Name:** Martin Chrisney

**Location:** Bethesda

**Date:** March 28, 2024

**Comment Noted**

The current road configuration on Little Falls has contributed immensely to pedestrian and bike safety. This should be weighed against any effort to create a divided highway which would result in little time saved for drivers and contribute to higher speed traffic and increased risk to life. In addition, prioritize green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway.

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**Name:** Andrew G Hyde  
**Location:** Bethesda  
**Date:** March 28, 2024

Comment Noted

Removing unused pavement and the existing two-lane configuration will prioritize safety and green space in the Little Falls Parkway Improvements project. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving

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**Name:** James Tauber  
**Location:** Rockville  
**Date:** March 28, 2024

Comment Noted

Please do not reverse the current approach. This is a deadly crossing. If you reverse the approach someone else will be killed in the future.

-----

**Name:** Jeremy Jacobsohn  
**Location:** Rockville  
**Date:** March 28, 2024

Comment Noted

Please consider the safety of cyclists and the purpose of parkland and REMOVE the EXCESS ASPHALT from the park roadway.

Drivers will speed if the road is left at its current width, regardless of how the lanes are marked.

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**Name:** Jeff Weingarten  
**Location:** Silver Spring  
**Date:** March 28, 2024

Comment Noted

I bike commute to work. Please prioritize safety and green space in the Little Falls Parkway Improvements project. The existing two-lane configuration is safer than the proposed divided highway. Getting rid of the unused asphalt invites drivers to speed and puts cyclists at risk.

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**Name:** Jennifer Hearn  
**Location:** Bethesda, MD  
**Date:** March 28, 2024

Comment Noted

As an avid cyclist and frequent user of the bicycle path, please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed

divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving. I'm also a resident of the area and drive from home to downtown Bethesda via this route without issue. The single lanes are safer. Drivers need to slow down! Thank you for your time and attention to this creation of a safe pedestrian green space.

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**Name:** H Emery Ford  
**Location:** kensington  
**Date:** March 28, 2024

**Comment Noted**

Please remove the unused pavement and convert it into green parkland. It is important to prioritize green spaces and the safety of pedestrians, bikers and runners. The existing two-lane configuration is safer than the proposed divided highway.

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**Name:** Naomi Spinrad  
**Location:** Chevy Chase MD  
**Date:** March 28, 2024

**See response to attachments at end of appendix.**

Please see attached PDF with my comments regarding Little Falls Parkway. Thank you.

[Attachment](#)

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**Name:** reed hundert  
**Location:** Chevy Chase  
**Date:** March 28, 2024

**See Section 5.3 regarding alternatives considered but dismissed**

We have lived within a few hundred yards of this parkway since 1980. Until you started meddling with it, there were never any material problems. My advice is: go away, give us back the divided highway with multiple lanes, and go do something useful. If you really want to improve anything, widen the pathway on the old railroad tracks. And if you want to do more than that, build a walkway above the parkway as was done for crossing River Road. But basically the message from me and the whole community is: take down the barriers, go away, and find something to do somewhere else. You really are shaking everyone's trust in competence of government.

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**Name:** Thomas Bergan  
**Location:** Chevy Chase  
**Date:** March 28, 2024

**Comment Noted**



PLEASE DON'T DO THIS. This project makes zero sense. The capital crescent trail literally parallels this road and is within .1 miles. This is a waste of money that will cause nothing but traffic and aggravation providing no benefit to the community.

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**Name:** Jane Padelford

**Location:** Bethesda

**Date:** March 28, 2024

Comment Noted

Many thanks to the Parks staff and Council for their hard work on getting the 2-lane configuration of Little Falls Parkway approved. I do think more attention should be paid to 1) the River Road/LFP crosswalks, and 2) the sidewalks and bike lines (both directions) along River Rd to connect to the Capital Crescent Trail. Walking or biking across the River Road/LFP intersection is treacherous and confusing. There is a tiny median, where pedestrians/cyclists have to wait while vehicles turn from LFP onto River Road. THERE IS NO SAFE WAY TO BIKE FROM LFP AT RIVER ROAD TO ACCESS THE CCT. A cyclist was killed on the River Road bike lane so nobody feels safe in these bike lanes.

Even though I live 5 minutes biking distance from the CCT I still drive my child to the LFP parking lot (Mass and LFP) so we can access the CCT and Little Falls Stream Valley Park safely.

On page 5, regarding public feedback to council, the link to the wufoo responses is broken. Could this be fixed?

Thank you.

Best,

Jane Padelford

Registered Landscape Architect

5300 Wakefield Rd

Bethesda, MD. 20816

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**Name:** Jon Michael Ross

**Location:** Washington

**Date:** March 28, 2024

Comment Noted

streets are public spaces, not just car transportation conduits (that's a polite way of saying car sewers...which is what most streets are...) haven't you learned by now that no educated person wants their life to revolve around car/truck-only infrastructure? try, for once, to take a wider view...falls parkway shouldn't be a racetrack -- which it currently is.

---

**Name:** Larry W Semakis

**Location:** Not Hispanic or Latino

**Date:** March 27, 2024

Comment Noted

Hello:

I am not persuaded by your findings that there is little traffic on the Little Falls Parkway by which you base your plan to make permanent the decrease from a 4-lane parkway to a 2-lane parkway.

1. By decreasing the parkway abruptly before the traffic light to a 1 lane at Dorset Avenue, I have noticed a number of traffic accidents as now cars in the right lane driving from River Road toward Dorset Avenue are compelled to abruptly squeeze into the left lane. That required yield, in my opinion and experience is a dangerous maneuver.

2. I have been driving to the Crescent Path from River Road then making a left turn at the traffic light on Dorset Avenue to park on Kennedy Lane where I park to then walk to the Path. Often, there is such heavy oncoming traffic that I am unable to make the turn because oncoming traffic is so heavy that I miss the timing of the green light! So much for your "study" of lighter traffic use on the Parkway.

Over the many, many months that you initiated the squeeze from 4 to 2 lanes, I have not seen a single pedestrian or bicyclist using the closed paved road. Meanwhile, both pedestrians and cyclists using the current Crescent Path confront increased two-way traffic at the now narrowed 2-lane crossing -- with frequent confrontations between many cars driving in both directions at that point on the Parkway. In fact, I witnessed several incidents when a cyclist was hit by an impatient car driver and the bicycle damaged because of this new 2-lane arrangement. Meanwhile, there we were with the empty 2-lanes on the other side.

In summary, in my view the sooner we return to the 4-lane parkway, the better. Thank you for giving my comments a sympathetic hearing.

---

**Name:** Patricia Johnson

**Location:** Chevy Chase

**Date:** March 27, 2024

Comment Noted

See attachment below with my comments. If you can't open it. Please let me know. Pat Johnson

[Attachment](#)

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**Name:** Stephen Ahearn

**Location:** Reston, Virginia

**Date:** March 27, 2024

Comment Noted

Please prioritize safety and green space in the Little Falls Parkway Improvements project, with removal of unused pavement and conversion into green parkland. The existing two-lane configuration is safer than the proposed divided highway. Unused asphalt is not a proper use of park land and its retention invites dangerous, high-speed driving.

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**Name:** Asimina Coroneos

**Location:** Bethesda

**Date:** March 27, 2024

Comment Noted

Please, please put Little Falls Parkway back to it's original plan, that works and was working since the 1960's, before the Parks Department messed things up with the numerous configurations that have been done since the Pandemic. I use LFP many days a week and am very frustrated with the traffic and backlog that this one lane causes. It is not safe the way it is. There is enough traffic to warrant the 2 lanes one way, for this 0.4 miles. The original plan of 2 lanes each side of the green median is what is needed. The walkers, bikers, etc. have many trails, like the Crescent Trail right there. They do not need to have a new path to "entertain" themselves with while the cars are causing congestion and therefore air pollution from sitting, because of the lack of lanes. In the over 2 years that the Parks have been "playing" around with LFP, I have seen a total of 25 people walking on the now closed lanes. That is about 12 people a year, meaning 365 days each year. That is one person every month on the path side! Definitely not a good use of the lanes built for the car traffic. With the construction of homes and businesses at Westbard, there will be much more traffic for LFP very soon. Put LFP back to the way it was! Now!

---

**Name:** Jackson Bennett

**Location:** Chevy Chase, Maryland

**Date:** March 27, 2024

Comment Noted

This project has been a disaster.

Restore all 4 lanes.

The proposed project creates traffic congestion, dangerous conditions and visual and noise pollution.

There is no need for bike lanes on this road. No bikes use this parkway.

Put it back the way it was before 2022.

Thank you.

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**Name:** Nancy Soreng

**Location:** Chevy Chase

**Date:** March 27, 2024

Comment Noted

As a resident of the Town of Somerset, I strongly disagree with the statement that the majority of residents want Little Falls Parkway to return to the the original 4 lane configuration. There has been no objective analysis to give credibility to that conclusion. I just finished listening to your recent public meeting where you explained NCPC's review role and process regarding the Little Falls Parkway Improvements Project. You did a great job of answering the many questions professionally and with great patience when the same concerns were repeated. Keep up the good work.

-----  
**Name:** Ann Bolten  
**Location:** Town of Somerset, Chevy Chase, MD  
**Date:** March 27, 2024

See Section 8.3 regarding aesthetics and visual quality

I would urge study the environmental effect of taking a beautiful, pleasant roadway and turning it into something ugly, unsafe, and confusing to drivers and pedestrians alike. Having watched cars at night drive the wrong way because of the mess this roadway has become, it's danger to the community requires no study but the psychological effect of taking something beautiful and making it ugly and unpleasant to navigate bears study and discussion.

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**Name:** Teresa Sparklin  
**Location:** Bethesda, MD  
**Date:** March 27, 2024

Comment Noted

I would like to provide my support for the current plan. I personally was for closing down one side and just having two lanes on the other, but this is a compromise from what both sides are interested in. I think this is good for the community and it is scoped appropriately. It allows for more open space for the communities surrounding this segment, but also still provides a place for through traffic.

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**Name:** Brandon Carter  
**Location:** Bethesda, MD  
**Date:** March 27, 2024

Comment Noted

I live in Battery Park and will be directly affected on a daily basis. I am appalled that Parks continues to waste money on this foolish endeavor. Every time it even slightly rains in this county, thousands of kids cannot play sports because athletic fields are closed. Why isn't Parks focusing its resources instead on solving that problem? We are at a time when youth sports participation is in decline and the only way for kids to play sports in this country is to have parents wealthy enough to pay exorbitant fees to private teams who rent turf athletic fields for play because Parks cannot deliver playable fields to serve all residents. its deplorable. And then I see here that Parks has a plan to rip up existing infrastructure at a time when state and county infrastructure resources are increasingly limited. It's very hard to understand what the goal is here except to see this project as service to misguided ideological interests. If Parks is insistent on moving forward with this plan it justifiably raises serious questions about the ability of Parks to serve the public interest in its current status outside of direct public, democratic institutions. If you continue down this route, it will be increasingly clear that Parks is captured by ideological interests and that reform to the governance structure is needed. Put simply, this plan is a waste of money in service of misguided priorities at a time when we have less resources and increasing needs. If this organization cares about racial and economic justice, it should be focusing its resources instead on improving the quality of athletic fields in this county so that all kids can play. Not wasting money ripping up roads.

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**Name:** Chris Roach  
**Location:** Silver Spring, MD  
**Date:** March 26, 2024

Comment Noted

Please prioritize the safety of all users in design and redesign of Little Falls Parkway. Allowing traffic separated by a wide, grassy median encourages drivers to lower their guard and pay the absolute minimum attention even in zones with heavily frequented pedestrian crossings. Further allowing these drivers to use separated lanes on ridiculously wide stretches of unused asphalt leads to driving at reckless and dangerous speeds. Pedestrians and cyclists have been injured and killed attempting to cross Little Falls Parkway, and the minimalist change of removing a lane in each direction virtually guarantees that more will be injured or killed in the future.

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**Name:** Lloyd Guerci  
**Location:** Hunt Ave, Chevy Chase, MD  
**Date:** March 26, 2024

Comment Noted

My comments on the proposed Little Falls Parkway Improvements are attached.

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**Name:** Karen  
**Location:** Bethesda MD  
**Date:** March 25, 2024

Comment Noted

I support this conversion of the .4 m of two lanes each way to one lane each way and adding a biking/walking park-like area. The biking infrastructure needed to improve to match VA & DC's strong efforts in this area.

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**Name:** Susan Blankenheimer  
**Location:** Bethesda MD  
**Date:** March 25, 2024

See Section 8.8 regarding public health and safety

Please bring back 4 lanes to Little Falls Parkway! The way it is configured now is very dangerous especially at night. I have had several near accidents with people veering over when the lane ends. With the bike lane barriers, if an emergency vehicle needs to get by there is no way for a driver to pull over! There is no need for a bike lane since it parallels the existing Capital Crescent Trail! This is a very dangerous road as it is now and not well marked especially at night! Thank you

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**Name:** Howard Marlowe  
**Location:** CHEVY CHASE  
**Date:** March 25, 2024

Comment Noted

I was driving between Arlington Rd and River Road on Little Falls last week. My car was in a line that was stoppd by a red light at Dorset and there were cars in line to turn left onto Dorset. Along came a fire truck with horn and lights blazing. The cars turning left headed for grass but I couldn't move to get out of the way because of the stanchions. This is ridiculous. It's a public safety hazard that can and will be repeated while this ill-conceived "improvement" is underway. Please end this now before someone gets seriously hurt. PS - On three trips last Thursday afternoon on Little Falls, I saw one couple walking their dog on the paved portion of Little Falls.

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**Name:** Jamie Weinbaum

**Location:** Bethesda, MD

**Date:** March 25, 2024

**Comment Noted**

Thank you for considering this feedback. I want to first say how much I appreciate that we all have the Capital Crescent Trail as a wonderful opportunity for walking, biking, and gathering. The addition of this shaded, linear space would not add to that, but would rather detract and create confusion. Further, there needs to be some road network that prioritizes moving residents east-west through this part of Bethesda. For those of us who live off of Mass Ave and by Sangamore, Little Falls Parkway is the main mechanism to get us to downtown Bethesda so we can shop and spend our \$\$ in the county. Don't make it harder for us to get there, forcing us to buy on-line or go south to DC. Recognize that multi-modal means all modes, including cars. Keep the 4 lanes - this was a solution looking for a problem. Please revert to what was there. Thank you.

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**Name:** Michael Tigani

**Location:** Bethesda MD

**Date:** March 25, 2024

**See Section 8.6 regarding traffic operations**

After listening to the most recent meeting, I guarantee you that no one who gathered utilization data has tried to travel on Little Falls Parkway during rush-hour. People are driving over 60 miles an hour to merge before hitting Dorset when heading towards Bethesda and Arlington Road. Whatever traffic consultants you used are greatly mistaken. There may be sufficient use during non-rush-hour, but rush-hour crowding will push cars into our neighborhoods and increase accidents and fatalities in areas other than the crossing at the capitol crescent Trail.

Who will police speeding bicyclist on the capitol Crescent Trail that run through stop signs? A bike lane on the woefully inadequate single road will be under utilized and unsafe.

Since we can't propose going back to the original four lanes, this proposal should be rejected unanimously, and then propose going back to the four lanes on Little Falls Parkway. By the way, no one has included the wonderful 2052 Plan to increase the population density on River Road to over 1 million more people between Western and the beltway. I doubt we will have a metro line parallel to River by then...



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**Name:** Elizabeth Katz  
**Location:** Chevy Chase, MD 20815  
**Date:** March 25, 2024

**Comment Noted**

I am a Kenwood resident. I have lived in Somerset and Kenwood since 1980. I have used Little Falls Parkway and the Capital Crescent Trail for 44 years and have enjoyed the beauty of the landscape in both areas for as many years. Improvements on the Capital Crescent Trail should be made. Bicycles and pedestrians share a too narrow path and there are often unfortunate consequences. Creating space on Little Falls Parkway does not make sense. No bicyclist wants to move from the trail to a short stretch of roadway to continue on his/her route and no walker does either. The whole concept of park and trail in this location makes no sense. On the other hand creating a safe transition where the path crosses Little Falls seems important and necessary but little attention has been paid to creating a truly safe path for bikers and walkers. The idea that anyone wants a park in close proximity to traffic is laughable, especially where there are pleasant park spaces in Kenwood and at Norwood park nearby. I can't imagine why anyone with children would prefer to picnic or play near traffic when these lovely parks are safe and removed from cars traveling at more than 10-15 mph. The congestion that build on Little falls Parkway during high traffic times is considerable. And with future development it is bound to get worse. Prior to the installation of unsightly barriers Little Falls Parkway was a lovely stretch of roadway. The improvements which might benefit walkers and bikers could be easily made. Sidewalks and bike lanes on either side of the road way would be safe additions. Speed humps could slow traffic. These additions would not alter the natural beauty of the strip of land. Additional lanes on the Capital Crescent Trail for bikes would also make sense.

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**Name:** Dominique Dagenais  
**Location:** Chevy Chase  
**Date:** March 25, 2024

**See Section 9.2 regarding travel time and level of service**

While the county has been approving the construction of multiple large buildings with condos off of Wisconsin, Old Georgetown, Westbard, and others, it plans to restrict the number of lanes on Little Falls: As a result the population density is increasing while roads are being restricted, bringing more cars cutting through residential areas, rather than offering planned arteries, such as Little Falls for commuting. This results in negative impacts on safety, environment, quality of life, and increases traffic delays for both local residents and commuters. Additionally, this area is already blessed with the Crescent trail and several adjacent parks dedicated to pedestrians/ bicycles and outdoor activities.

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**Name:** James Bergmann  
**Location:** Chevy Chase  
**Date:** March 25, 2024

**See Section 7.6 regarding air quality**

You need to restore the road to 2 lanes each way with the median in the middle. As for the intersection with the CC trail. The bike riders NEVER stop at the stop sign. Please stop pandering to these law breakers. We need to keep traffic moving. Idling cars is bad for the environment.

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**Name:** David Hathaway  
**Location:** Bethesda, MD  
**Date:** March 24, 2024

See Section 9.1 regarding impacts to surrounding communities.

There is still no explanation for WHY any lanes on the previously well functioning and vital Little Falls Parkway need to be closed. Why??

From the community perspective, we've been through a bewildering process whereby non-community bureaucrats in Montgomery County inexplicably attempted to close the road, create a nonsense on-road park that no one needed or wanted, got rid of long-fought for safety measures on the Crescent Trail crossing. Community outrage prevented most of this from moving forward.

But yet there is this inexplicably inevitable closing of two lanes of the Parkway, which is a vital roadway connecting many thousands of residents west of River Road to downtown Bethesda. No one from the county has ever articulated WHY THE ROADWAY NEEDS TO BE REDUCED BY TWO LANES. The switch to two lanes is already causing backups that never existed previously, and this is before the massive new residential and commercial development at Westbard is completed

Our community is due a better explanation for why on earth the county seems dead set on ruining a perfectly well functioning and vital roadway.

Why these changes that no one has asked for, and that will degrade transportation and quality of life for our community?

Why?

Who can answer this?

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**Name:** David Johnson  
**Location:** Chevy Chase  
**Date:** March 24, 2024

See Section 9.2 regarding travel time and level of service

All the attention on LFP began with the 2016 death of an elderly bicyclist who willfully blew through a stop sign on a recliner bike with the flag down, and struck a car. The decedent's wife noted that her husband never obeyed traffic signs, that it was his own fault that he was killed, and the driver of the car he struck was not found at fault. Up to that point the crossing at the CCT was safe, with a wide oasis at the crossing, as were the 4 lanes of traffic on LFP between Arlington and Dorset. MNCPPC has since spent massive amounts of taxpayer funds and repeatedly massaged this 0.4 mile section, tried to make a linear park that was not needed or wanted (within an area already replete with parks), made it unsafe with its current pattern, and ignored and inflamed the citizens who use the LFP on a daily basis. Afraid of Parks, and of a



citizen revolution, the MC County Council voted for a "compromise solution", which is still unpopular with the citizens (they want the LFP back to the original pattern since 1957), and which "compromise" the NCPC is now considering. So my questions are: How does any plan for LFP protect pedestrians and bikers who willfully ignore common sense and traffic signals and signs? Unless a pedestrian/bicycle bridge is built (which MNCPPC said would cost \$20M--the same cost as what is planned for the 0.3-0.4 mile bridge from Crystal City to DCA!!), how is the planned compromise any safer than what we had before? How will it have the same carrying capacity we had before with 4 lanes of traffic to equal half the carrying capacity with only 2 lanes when we face 32.5M square feet of new building planned and built for Bethesda (7M still to be built), 1.8M square feet planned for Westbard, about to be built, and new building along the River Road Growth Corridor (already planned for a high rise condo on Landy Lane)? Already the intersection of LFP with River Road is rated D (according to the Brudis Report of 3/30/2023) with only 2 lanes from Mass Ave to River, and 4 lanes above River to Dorset! At the very least, can we have the 2 lanes separated by the wide median restored NOW between Dorset and Hillendale as a partial gesture of goodwill to the citizens who have put up with a dangerous traffic pattern for too long? Thank you.

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**Name:** Barbara

**Location:** Bethesda

**Date:** March 23, 2024

**Comment Noted**

I continue to consider the current arrangement unsafe. I find the road too narrow for two way traffic.

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**Name:** Carla

**Location:** Bethesda, MD

**Date:** March 23, 2024

**Comment Noted**

I disagreed with the "pilot project", the reduction in the number of lanes at Little Falls Pkwy and have felt very unsafe driving or walking in the area since the current configuration was put in place. As a compromise, I accept the proposal to have two lanes separated by the median where traffic goes in only one direction on each lane. Any bike path along each lane must be properly configured and safeguarded. I also think that lighting must be installed along the stretch and all the way down to the intersection with Mass Av. Night driving is particularly dangerous in this stretch. There are deer on either side that can pose a danger for all users. I have seen bikers use the car lane where they're not supposed to be, endangering themselves and others, even at nighttime. The road is particularly unsafe for drivers who are not familiar with it. I also think that sidewalks are needed along the stretch from Little Falls and all the way to Dorset. Thank you.

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**Name:** Steve Kornblatt

**Location:** Silver Spring, MD 20906

## Comment Noted

**Date:** March 23, 2024

I am opposed to the reduction of the number of available lanes for Little Falls Parkway. I would strongly urge the current status to be reversed. When I drive at night, the lanes switched are confusing and dangerous.

I do not see any value to the community make the changes that has already occurred.

This is as ill-advised as the crazy white barriers that were installed on Old Georgetown road.

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**Name:** Geary Fisher

**Location:** Chevy Chase, MD

**Date:** March 23, 2024

## Comment Noted

There seems to be opinion that a 2 lane road is safer than a 4 lane road for cyclist and pedestrians to cross. I disagree. As a walking user of the trail, I now have to look BOTH ways to determine if it safe for me to cross the parkway. Not a good idea. Prior to the current configuration, I was able to safely look in one direction, cross to the center median and THEN look in the opposite direction to safely cross that lane of traffic. Much safer for me. I travel the parkway often from my home in Chevy Chase to the many shops and store on River Road. That area is developing more and more so, I suspect, there will be an even greater desire for me and many others to travel this section of the parkway. Safety for all is a valid concern, but automobile traffic is here to stay as well. I don't know the original idea for the parkway, but whatever that was, it now a somewhat major link between two developing areas. This idea needs to be factored in as decisions are made of the future of the parkway.

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**Name:** Patricia Johnson

**Location:** Chevy Chase, Maryland

**Date:** March 23, 2024

See Section 8.8 regarding public health and safety. Please note that the letter from Assistant Chief Jones was superseded by letter dated September 27, 2023 from Interim Fire Chief John Kinsley.

Please see Fire Safety Chief, Adam Jones' letter of March 16, 2023

[Attachment](#)

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**Name:** Patricia Depuy Johnson

**Location:** Chevy Chase, Maryland

**Date:** March 23, 2024

See response in attachments at end of appendix.

Please see my comments in pdf attached. Thank you. Pat Johnson (3019225382)

[Attachment](#)

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**Name:** Jennifer  
**Location:** MARYLAND  
**Date:** March 23, 2024

**Comment Noted**

This has to be the most ridiculous and short sighted " decision" in recent years in MC. Why would the county decide to do this after they caved to developers who have over built every inch of space in downtown Bethesda to build an over abundance of new very expensive apartment buildings. Where are these people going to drive? On Little Falls Parkway which was just a a perfect way to connect to River Road and Massachusetts Avenue. Plus the county's success with putting bike lane's seemingly everywhere that are often not even used and in some place dangerous particularly on Woodmont Avenue and Old Georgetown Road is just over kill. Plus the county seems to ignore that walkers and bikers have the Capital Crescent to use! This all seems suspicious that someone somewhere in the country is profiting and it's not really about conservation at all. If the county was really concerned about this issue why would they waive any concerns of the nearby residents to developers. Look I live in a new condo building in downtown Bethesda. I understand that Bethesda is now a urban area and not the sleepy suburb it once was. But it's over developed and there seems like there's no end in site and rents in all of these buildings will be astronomical and not affordable to most even MPDU units. These new residents will have cars. And the reconfiguration of the Parkway just seems to ignore this and wants to make it Copenhagen where everyone rides a bike to work. That's not going to happen. It's not only a dumb decision but it will make Bethesda more congested not less and with cars not bikes. I've taken 20 minutes of my time to write this knowing full well it won't make any difference. The county and developers always win. It's about Capitalism stupid.

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**Name:** Linda Kirvan  
**Location:** Bethesda  
**Date:** March 23, 2024

**Comment Noted**

Our/my taxes paid for the construction of the Little Falls Parkway. I can see no reason to reconfigure the Parkway. It allows drivers to get from one residential area to another without adding to the increase of traffic in the busier and more congested commercial areas nearby. It is crossed by a trail (Rails to Trails) that is heavily used and that does increase the need to address the safety issues. But, since the road "diet" that has been in effect since Covid, I have seen very FEW people, walkers, riders, etc. use the closed section of the Parkway. I have seen a big increase of the use of the trail on good weather days. Let's focus on the safety of the crossing area (over pass or underpass) and leave the LFP as it was originally constructed as a safe, reliable, pleasant way to get from one area to the next. The big curve that is now an accident waiting to happen at Hillandale and at Arlington should not be allowed to stay. Keep it a divided road with a green median strip, just as it was designed.

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**Name:** Lynne Baum  
**Location:** Bethesda MD

**Date:** March 23, 2024

## Comment Noted

This project is a waste of government resources. The road diet at the trail crossing was successfully implemented. No justification exists to reduce an important road from 4 to 2 lanes.

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**Name:** Carl Becker

**Location:** Bethesda MD

**Date:** March 21, 2024

See Section 5 regarding alternatives

NCPC STAFF,

I would like to share my predicted "Environmental Impacts" from the proposed changes to Little Falls Parkway. I have documented most these impacts with video footage of the interim condition which functions almost identically from a traffic perspective to many parts of the proposed design.

Southbound vehicles back up from Dorset Avenue to Arlington Road and sometimes up Arlington towards Bradley. This condition occurs because by cutting the number of lanes on half, the stacking space has been cut in half so half the number of vehicles pass per light cycle. I'm not asking to revert back to two southbound lanes. But I am asking that there be two stacking lanes just north of Dorset Avenue so that more vehicles can pass per traffic light cycle. The other option would be to lengthen the traffic light cycle time, but I doubt this is feasible as the east west cycle on Dorset would need to be reduced.

This video shows southbound backups during the morning commute:

<https://www.youtube.com/watch?v=njSwHel-Zpc>

This video shows southbound backups during the evening commute:

<https://www.youtube.com/watch?v=cFsftOTVVNw>

This video was taken on a different day and shows more southbound backups during the evening commute: <https://www.youtube.com/watch?v=9ycoxFiwuXA&t=229s>

This video shows LFP traffic backed up Arlington Road almost to Bradley Blvd:

<https://www.youtube.com/watch?v=oRGODHA-K7w>

Because traffic backs up further, some residents of Kenwood and Somerset said they have been unable to make left turns and would like dedicated turning cycles- adding dedicated left turn lanes would shorten the already insufficient light cycles and would be catastrophic for commuters by further increasing the distance cars backup.

The 2019 Facility Plan report provides invaluable perspective and engineered designs which are worthy of reconsideration. For instance, the proposed mid block trail crossing location is

the same as the current trail crossing location and will not be signalized or controlled in any way. A better, safer solution would be to move the trail crossing to Arlington Road. The frequency of pedestrian and cyclist interruption to traffic flow can be maddening at peak flow- at times a pedestrian or cyclist might stop every other car. These periods of maximum pedestrian and cyclist interruption typically coincide with vehicle commuter flow- cyclists pedal to work around the same time that drivers commute to work. And a lot of runners/walkers like to get their exercise in the early morning and late afternoon when commuters are coincidentally driving to/from work. An unsignalized trail crossing is dangerous- bikes and pedestrians effectively self negotiate every crossing of Little Falls Parkway. Reinstate the wide median and move the trail crossing to Arlington Road. This video shows how much speed bicyclists carry (and a few close calls!) when running the stop sign across Little Falls Parkway. They'd have much more respect for a pedestrian signal at the signalized LFP & Arlington intersection: <https://www.youtube.com/watch?v=BkxH5Dj9BXM>

Another issue is the proposed short right turn lane from little falls parkway onto Arlington road. Most of the northbound LFP vehicle traffic is turning right onto Arlington road. It will be especially frustrating if the ability to make a right turn from LFP onto Arlington is eliminated. Northbound traffic will backup unnecessarily. The better solution is to curve little falls parkway onto Arlington and eliminate the intersection. This solution was just implemented on Westbard Avenue and it's brilliant! This idea to curve the road is better illustrated in the below 2019 facility plan report.

<https://montgomeryplanningboard.org/wp-content/uploads/2019/05/Capital-Crescent-Trail-Little-Falls-Parkway-Facility-Plan-Report.pdf>

The northbound right turn lane from little falls parkway onto Dorset Avenue is conflicted with a merge lane. The merge would be smoother if it were just north of Dorset Avenue. Please watch these videos or try driving the parkway during morning and evening commutes. I'd be happy to meet onsite and explain in person. This video shows the issues with having a merge lane comingled with a right turn lane, as well as highlights issues with the lack of maintenance by MoCo Parks: <https://www.youtube.com/watch?v=poyvsre89v8>

This video shows how far traffic can backup from River Road to Mass ave on Little Falls Parkway: <https://www.youtube.com/watch?v=FkEQYmAZ8DU>

Oh, and then there is the bridge idea... a boy can dream! (I'd love this for my three young kids) More development will bring more vehicles, and more bikers/pedestrians

Little falls parkway and the capital crescent trail are extremely important local resources. Thank you all very much with your help coordinating these efforts. I'd love to come meet with you all in April to discuss.

Carl Becker  
m: 301 873 3221

4905 Brookeway Drive  
Bethesda, MD 20816

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**Name:** Tim Osumi  
**Location:** Bethesda, MD  
**Date:** March 20, 2024

Comment Noted

This is an absolutely fantastic plan and I 100 percent support it. I bike on the parkway now when the trail is too full of pedestrians and I love it. This is what a real parkway is supposed to look like. Please, please, continue doing your good work and know that the angry, loud drivers who hate sharing open spaces are a (dwindling) minority and you are very much appreciated by the silent majority and those who enjoy this in the future. Thanks, keep up the good work!

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**Name:** David S. Kosterlitz  
**Location:** Bethesda, Maryland  
**Date:** March 19, 2024

Comment Noted

The intersection of the Capital Crescent Trail (CCT) and Little Falls Parkway (LFP) is extremely dangerous. Tragic accidents have occurred there, including at least one cyclist death. To make it safer, LFP was narrowed from a divided four lanes to an undivided two, but the asphalt from the unused two lanes is still there. Now, unfortunately, there is a proposal to make the highway divided again and leave that asphalt. This is a bad idea and would encourage speeding. It should not be done. The unused asphalt should be removed and replaced with grass or plants, appropriate for park land.

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**Name:** Jim Kohlenberger  
**Location:** BETHESDA  
**Date:** March 19, 2024

Comment Noted

Dear National Capital Planning Commission,  
Please help protect a safe and vibrant community by maintaining the existing two-lane configuration on Little Falls Parkway. As someone who regularly drives, bikes and runs through the intersection of Little Falls Parkway and the Capital Crescent Trail, I've seen first hand how effective the road diet and traffic calming measures have been. It's been a real improvement, and has made it safer for everyone.

This existing two-lane configuration is safer than the proposed divided highway -- for all users. Maintaining unused asphalt is not a proper use of park land. it needs to be converted to green space. Retaining a 28-foot-wide asphalt strip on each side of the median invites dangerous, high-speed driving.



As someone who ended up going over my handlebars in the middle of the Little Falls Parkway and Capital Crescent Trail intersection prior to the current restrictions, I know first hand how important it is to have a safe intersection. While I was fortunately OK, with so many children now crossing this intersection, please don't backtrack and put them in harms way.

Thank you for your service to your community.

Jim

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**Name:** Josh Silver

**Location:** Bethesda MD

**Date:** March 19, 2024

Comment Noted

To Whom it May Concern:

I am a strong supporter of mix modes of transportation for Little Falls Parkway. I strenuously oppose reverting back to two lanes of highway in either direction. It is not necessary to revert for moving car traffic and is very dangerous for bicyclists and pedestrians. I also oppose retaining several feet of unpaved asphalt in either direction. That invites reckless driving. I want any unused space to be converted to green space. I know what it is like to be hit by a car while biking; I experienced a broken arm when a driver turned right on a red light and ignored me while I had a walk sign when I was biking. The final reconfiguration must be traffic calming instead of facilitating reckless driving. Signage must be clear and visible that walkers and bicyclists are also using the area. Thank you for consideration of my views.

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**Name:** Jake M. Goodman

**Location:** Rockville, Maryland

**Date:** March 19, 2024

Comment Noted

Please prioritize safety and green space over fast movement of automobiles. Little Falls Parkway should remain a single two-lane roadway. Unused pavement should be removed and made into green parkland. Here are some important factors to consider when making your decision in the final assessment of this new proposal:

- The existing two-lane configuration is safer than the proposed divided highway.
- Unused asphalt is not a proper use of park land; it must be converted to green space.
- Retaining a 28-foot-wide asphalt strip on each side of the median invites dangerous, high-speed driving, and possible pedestrian deaths.

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**Name:** Sebastian Silvani

**Location:** Bethesda

**Date:** March 19, 2024

Comment Noted

I am writing to voice strong support to 'right size' Little Falls Parkway, and to ensure it safely meets the needs of all users, particularly the most vulnerable users- walkers and bikers.

As the data clearly shows, reducing vehicle speed is the primary driver of increased safety. A secondary strategy is to separate VRUs from vehicles with a strong physical barrier. The changes already made (reducing from 4 lanes to 2) has been effective and should remain and be made permanent.

I request that the two-lane configuration remain, without a median buffer. No median between each travel lane reduces the crossing distance, and encourages slower speeds due to the closer passing between cars traveling in opposite directions.

Furthermore, increasing greenspace and reducing asphalt should be a priority for park land use. For this reason, removing asphalt should be a priority whenever possible, such as the portion no longer used by vehicles. Making this change will create a more natural and beautiful setting that ALSO increases safety for all road and park users.

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**Name:** Mark Obrinsky

**Location:** Bethesda

**Date:** March 19, 2024

**Comment Noted**

I am writing to oppose returning Little Falls Parkway to a divided highway; please keep it as it currently stands: a two-lane roadway with one lane in each direction. For several reasons:

First, the current two-lane roadway (one in each direction) is safer than the proposed divided highway.

Second, keeping a 28-foot-wide asphalt strip on each side of the median unfortunately encourages high-speed (hence more dangerous) driving.

Third, this is, after all, park land. Why are we keeping asphalt instead of turning it into green space? There's already plenty of asphalt all around; let's keep/make park land green.

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**Name:** Benjamin Ross

**Location:** Bethesda

**Date:** March 18, 2024

**See Section 5 regarding alternatives**

The Montgomery County Council plan for Little Falls Parkway is inadequate. Four lanes of asphalt will remain in place, encouraging drivers to drive at dangerously-high speeds and violating the intent of the Capper-Crampton Act. It is a step backwards from the genuine no-build alternative, maintenance of current conditions, which NCPC is legally required to include in its NEPA analysis.

When drivers were allowed to use all four lanes of Little Falls Parkway, pedestrians and bicyclists using the Capital Crescent Trail were frequently hit by drivers at the trail crossing.



Ned Gaylin, 81, was killed by a driver at the trail crossing in 2016. After his death, Montgomery Parks reduced the number of lanes at the trail crossing from four to two, greatly increasing safety and comfort for trail users. Unfortunately, the section of Little Falls Parkway that remains four lanes, between Dorset Avenue and River Road, is still dangerous. The Montgomery Parks study for this project found that the majority of drivers go 40 mph and some go as fast as 60 mph, notwithstanding the 25 mph speed limit and the adjacent elementary school.

The purported reason for keeping the asphalt is emergency vehicle access. However, the Montgomery Fire and Rescue Service and the Montgomery County Police Department said that this is unnecessary. The real reason, as opponents of asphalt removal stated repeatedly in public meetings, is to facilitate a return to the deadly pre-2018 road design. The unnecessary asphalt maintains impervious surface for no park-related purpose. NCPC should not permit this on Capper-Crampton land.

The best configuration for Little Falls Parkway is the arrangement currently in place north of Dorset Avenue, with two lanes for cars (one lane each way) on the pavement on the east side of the median. The two-way, undivided road encourages drivers to drive at slower, safer speeds, and emergency vehicles will be able to pass stopped traffic.

In the future, this should be extended to encompass the entire distance from River Road to Arlington Road. On the west side of the median, the pavement not used for bicycle lanes should be removed, and the land should repurposed as forest growth, playgrounds, picnic areas, or other park uses.

NCPC staff has erroneously identified the pre-2018 four-traffic-lane condition as the no-build alternative. The high crash frequency resulting from this configuration shows that it is not a reasonable alternative and should not be considered. Also, it is not a no-build alternative -- it requires construction to reroute the trail on the east side of the median, relocate the crosswalk, and remove the existing raised crosswalk.

The no-build alternative in the NEPA study must be the current two-lane configuration of the road, not the condition of many years ago. The county-proposed build alternative would be a step backward. That alternative would make the roadway less safe and obstruct implementation of the needed future improvements, such as extension of the two-lane configuration to River Road and removal of unused asphalt.

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**Name:** Janet H Ansary

**Location:** Bethesda

**Date:** March 18, 2024

**Comment Noted**

I write to oppose any closing of any part of Little Falls Parkway. There was a perfectly good four-lane road going cross county and to take a portion to make two lanes is a strange

selection. Have you seen the volume of cars that use this road daily getting to and from workplaces? There is a perfectly good trail paralleling the road that can be used for bikes and walks.

More and more residential units are being built in Bethesda and you can be sure these people will have a car- although I realize your plan is for them to take public transportation everywhere or ride a bike.

Why, when there is large public opposition, do you keep bringing this up?

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**Name:** Martha A Curtis

**Location:** Bethesda

**Date:** March 18, 2024

**Comment Noted**

PLEASE restore Little Falls Pkwy to its original state which used to be an enjoyable and pleasant drive in the area. Now the visual beauty of the trees along the parkway is greatly impaired by all the plastic barriers, orange and white!! In addition the traffic is compromised for no reason as there are far many cars than there are walkers or bikers using this stretch of road. Before the closing of the 2 lanes the traffic wasn't half as noticeable because it had the lane space to move along.

PLEASE! PLEASE! Put it back to its original state!!

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**Name:** Shari Pfleeger

**Location:** Washington, DC, 1 mile from Little Falls Parkway

**Date:** March 18, 2024

**Comment Noted**

I understand that automobile speeding is one of the key problems on Little Falls Parkway. Why not just put in some traffic calming measures, instead of reconfiguring the entire parkway? I'm a cyclist and pedestrian who uses Little Falls Parkway regularly, to get to and from Bethesda. I already have two excellent options along Little Falls Parkway: the Capital Crescent Trail and the paved footpath from Dorset to Norwood Park/Bethesda Pool. I don't really need another option. And the proposed protected lanes would have cyclists and pedestrians breathing in the automobile fumes -- something that is far less a problem on the existing cycling/walking options.

Montgomery County has limited resources and several severe problems to address. I strongly recommend a cheaper, traffic-calming approach on Little Falls Parkway, so that most of the \$600,000 can be directed to those more urgent needs.

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**Name:** Action Committee for Transit

**Location:** Montgomery County, Maryland

**Date:** March 17, 2024

**See Section 5 regarding alternatives**

The Action Committee for Transit believes the Montgomery County Council's plan for Little Falls Parkway is inadequate. Four lanes of asphalt will remain in place, encouraging drivers to

drive at dangerously-high speeds and violating the intent of the Capper-Crampton Act.

When there used to be four driving lanes on Little Falls Parkway at the Capital Crescent Trail crossing, pedestrians and bicyclists using the Capital Crescent Trail were frequently hit by drivers at the trail crossing. Bicyclist Ned Gaylin, 81, was killed by a driver at the trail crossing in 2016. His death led Montgomery Parks in 2018 to reduce the number of driving lanes at the trail crossing from four to two, greatly increasing safety and comfort for trail users.

Unfortunately, the section of Little Falls Parkway that remains four driving lanes, between Dorset Avenue and River Road, is still dangerous. The Montgomery Parks study for this project found drivers go as fast as 60 mph, notwithstanding the 25 mph speed limit and the adjacent elementary school.

The purported reason for keeping the unused two lanes of asphalt is emergency vehicle access. However, the Montgomery Fire and Rescue Service and the Montgomery County Police Department said that this is unnecessary. The real reason, as opponents of asphalt removal stated repeatedly in public meetings, is to facilitate a return to the deadly pre-2018 road design of four driving lanes. The unnecessary asphalt maintains impervious surface for no park-related purpose. NCPC should not permit this on Capper-Crampton land.

The best solution for Little Falls Parkway is two lanes for cars (one lane each way) for the entire length from River Road to Arlington Road, using the current pavement on the east side of the median. The two-way, undivided road will encourage to drivers to drive at slower, safer speeds, and emergency vehicles will be able to pass stopped traffic. On the west side of the median, any pavement not used for bicycle lanes should be removed, and the land should repurposed as forest growth, playgrounds, picnic areas, or other park uses.

The no-build alternative in the NEPA study must be the current two-lane configuration of the road - not the condition of many years ago.

-----  
**Name:** Jordan Day

**Location:** Bethesda, MD, 20817

[See Section 5 regarding alternatives](#)

**Date:** March 17, 2024

Overall this project is an improvement on current conditions and pre-pandemic conditions. Two changes should be made to the proposed alternative:

1) The right side northbound lane should be removed permanently.

2) The currently proposed dividers between the shared use path and travel lanes should be changed to a concrete curb or combination of concrete curbs and flexposts, as is typical in other county protected lane projects. The currently proposed zebra dividers will provide no protection in the event of a car leaving its travel lane and will not provide an all-ages, high comfort facility.

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**Name:** Roger Cochetti

See Section 9.2 regarding travel time and level of service.

**Location:** Chevy Chase, MD

**Date:** March 17, 2024

It's not clear whether my emailed comments were received by the Commission, but if they were, then the earlier comments should be ignored since these are somewhat duplicative.

I have lived within a mile of Little Falls Parkway (LFP) for over 30 years, during 10 of which we raised 2 children from the perimeter of Norwood Park. During this time, I have hiked and bicycled along LFP and driven my car along LFP almost every month. The proposal to eliminate two lanes of LFP and replace them with a hot dog-shaped park is misguided and harmful to both local and regional communities. The area is blessed with 2 magnificent parks within a quarter mile of the proposed park that are underutilized and 2 hiking/biking trails that parallel the park within 100 yards of either side of the proposed new park. Conversely, closing 2 lanes on LFP (so called "road diet") will increase traffic congestion, adding more -not less- pollution and CO2 to our air and waste millions of hours of driver's and passengers' time as they sit in traffic jams. Meanwhile, virtually no one will abandon the existing nearby parks and trails to use this proposed new park. There are far far better uses for the County's parks and recreation resources than this wasteful and harmful proposed park.

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**Name:** AJ Gross

**Location:** Chevy Chase MD

See Section 5 regarding alternatives

**Date:** March 16, 2024

1. Please include a median for those crossing Little Falls Parkway from the Crescent Trail. The prior structure was preferable because it was safer. I could look one way, go to the median, look the other way and cross. Having to look right and left essentially simultaneously is tricky.
2. Need a right turn lane for cars turning onto Arlington (as was the case previously). Currently cars are backed up in front of the Crescent Trail crossing if the lead car is going straight on Little Falls rather than turning right on red onto Arlington.
3. Turning left onto Dorset/Kenwood traveling on Little Falls from River is now dangerous especially if the line of sight is blocked by a car turning left onto Dorset into Somerset. Because cars are traveling single file, it is very difficult to turn left into Kenwood and I have seen several close calls.
4. Make it easier and safer for cars turning right on red onto Little Falls from Dorset. The current structure makes it very hard to safely turn right on red which leads to cars backing up to the trail crossing.
5. Improve the trail crossing at Dorset .

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**Name:** Horn

See Section 2.2 regarding purpose and need

**Location:** Chevy Chase, MD

**Date:** March 15, 2024

I fully support this project. It is long overdue and should help with safety and overall enjoyment of the area.

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**Name:** Eric Wassermann

See Section 2.2 regarding purpose and need

**Location:** Bethesda

**Date:** March 13, 2024

I am in favor of the plan, but wish to point out that the bicycle component is an incomplete solution which does nothing for cyclists coming from south of Dorset, especially from River Road. These cyclists must either work their way through Somerset or Kensington to Dorset or ride on the four-lane part of LFP, which is inhospitable and patently dangerous. This vestigial stretch of parkway is an invitation to motorists to speed and provides no traffic relief, since it is bounded on both ends by two-lane segments.

I would like to see this stretch changed to two lanes with safe cycling infrastructure, but in the meantime, more speed signage and, perhaps, BMUFL signs or pavement markings should be added. I ride this piece of road every day and fear for my life.

---

**Name:** David C. Johnson, MD, FAAOS

See Section 8.8 regarding public health and safety

**Location:** Chevy Chase

**Date:** March 12, 2024

I am an orthopaedic surgeon, living in this area for the past 43 years, and with a lifetime of trauma experience. The way LFP is now configured between Dorset Avenue and Hillandale Road is a danger to the community. The previous configuration of four lanes (two in each direction) was safe and without incident for years, yet Montgomery Parks changed this 0.4 mile stretch to its present configuration, not for any safety issue (as noted by President of the Montgomery County Council), but for the purpose of a possible award for reclaiming roadway for a linear park (in an area of the county with a surfeit of parkland). I, myself, have experienced a near head-on collision turning left (north) onto LFP from Dorset, and have heard of four others with similar experiences. Traveling south, a driver turning right onto Dorset cannot see an adjacent bicyclist for the bollards--an accident just waiting to happen should the biker decide to either turn right or go straight through. A driver traveling north in the right lane from River Road has no sign to tell him his lane will end at Dorset, and this causes him, as he travels around a blind curve just south of Dorset, to suddenly need to jockey over into the left lane against adjacent traffic if he wants to continue north. Also, emergency vehicles try to avoid this stretch of road, that is narrowed by bollards just above Dorset, as it is more difficult to negotiate passage due to confining bollards. With only one lane in each direction, with little



break-down lane availability in the present configuration, it takes far longer to travel this stretch of road--and in rush hour traffic, it's painfully slow. Chief Bailey noted that negotiating this stretch of LFP now takes 14 minutes (from Arlington to River), when it used to take 5 minutes. A neighbor recalled that it took over a half hour for his wife, in an ambulance with a bleeding head wound to travel the route on LFP. Such a delay would mean the difference between life and death for a child who inhaled a piece of hotdog and couldn't breathe, or a mother, awakened in the middle of the night with her house on fire, and can't get to the upstairs children's bedrooms. Think about it. Emergency vehicles are now cutting through adjacent neighborhoods (with no sidewalks) to avoid this stretch of LFP. None of this is "Vision Zero." Overwhelming numbers of citizens (especially those who live here and use LFP every day) have sent letters and signed petitions to return this stretch of LFP to its original (and safe!) 4 lane configuration between Dorset and Hillandale. The County Council, in a "compromise", ordered that the original median be preserved and one lane each north and south be returned immediately. Montgomery Parks is still delaying even doing this. Shame!

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**Name:** Sharon Whitehouse

**Location:** Bethesda

**Date:** March 12, 2024

See Section 3.5 regarding project history and neighborhood coordination; Section 5.3 regarding alternatives considered but dismissed

To: National Capital Planning Commission

I currently serve as the Sr. VP for Westmoreland Citizens Association and am the former three-year president of the WCA during and following the pandemic, 2020-2023. I have been involved with the parkway issue since Parks decided to close it on the weekends for "recreational" activities, forcing a huge amount of traffic to cut through adjacent neighborhoods and crowd other roads. I am a 44-year resident of the county and frequent parkway driver. My husband is a 62-year resident of the county and is also a frequent parkway driver, as was his father who recalls the building of the parkway which enabled him to commute daily to his job at NIH. Indeed, the parkway was built for the residents along the Massachusetts Ave. corridor to be able to access the businesses in Bethesda. Unfortunately, the Parks department did not listen to the overwhelming majority of the residents in the communities most affected by these proposed changes who petitioned to return the piece of the parkway between Hillandale Road and Dorset Avenue to four lanes. Much documentation was provided on the subject to support the rationale for doing so; in fact, there has been no meritorious reason for not doing so. The county council heard the residents but basically ignored them, instead voting for a "compromise" to appease Parks and a few others in the county who are unaffected by their decision to impose hardships on the residents in the neighborhoods surrounding the parkway. Sadly, the elected officials have not been responsive to their constituents.

Your role in this process is not to rubber-stamp the mistakes of the other agencies and officials but to understand and question what they are doing and hold them accountable pursuant to your responsibilities. Parks has never evaluated the parkway from an environmental perspective nor did it coordinate with the adjacent neighborhoods, conduct sufficient traffic

studies, or coordinate with the Westbard Sector Plan which proposes to bring significant development to Bethesda.

My questions representing many others in our communities are as follows:

1--The increased development that is already proposed and approved for the Bethesda area in the near future. Given this inevitable consequence of development will lead to increased traffic, could you please help the county avoid wasteful spending on parts of the project that will be more difficult and costly to reverse?

2--The safety issue which is everyone's goal focuses on the Capital Crescent Trail (CCT) crossing over the parkway between Arlington Road and Hillandale Road. No one is disputing that the parkway should be two lanes in that area, but why cannot a bridge over the parkway, the safest of all options, be considered? A bridge for the CCT built over River Road works well. It would be a win-win for both cyclists and cars. Yes, it is more costly, but funds could be raised. The environmental concerns about the location in the stream valley which are your purview to address would be put to rest by a bridge.

Thank you for your consideration of my comments which represent the views of many others.

-----  
**Name:** Patricia Depuy Johnson

**Location:** 5301 Oakland Road Chevy Chase,

**Date:** March 12, 2024

**Comment Noted**

1. This project purports to be a "vision zero" project. That is not true. The project began when the now retired director, Mike Riley, wanted a national award for a park before he left his post. He wanted a "linear park" in which to put corn hole games, benches etc and food trucks for events. The idea was voted down by the County Council on May 8, 2023. Moco Parks then changed tactics and declared it a "vision zero" project. However, no accidents have been reported on that specific .4 of a mile parkway except 8 years ago in 2016 when a biker on a recumbent bike with the flag lowered was killed by a driver at the CCT crossing. That driver was not given a citation, the biker was in error. The CCT crossing is MORE DANGEROUS THAN EVER WITH THE CONFIGURATION INTRODUCED BY PARKS IN JUNE OF 2022.

2. March 30, 2023: there was a public hearing in front of the MC Planning Board where 71% of those testifying asked that the Parkway be re-opened to 4 lanes again for safety and density needs.

3. April 27, 2023: The public that testified at the public hearing was ignored and a temporary Planning Board approved Parks' plan anyway with 4 votes and 1 abstaining. That Planning Board Chairman and another PB Member were replaced shortly after the vote.

4. May 1, 2023: An Open Meetings act Violation was filed by citizens against the Planning Board and submitted to the State Attny. General. That violation stated that a quorum of at least 3 members of the voting Planning Board had visited the site together with Mr. Riley and other members of Parks' staff for an information session on March 31, 2023 (after the public hearing) in violation of the Open Meetings Act Rules. That complaint was never resolved by the State

Committee.

5. November 27, 2023: The PHP Committee of the County Council recommended that the County Council's plan for the Parkway be utilized. That meant moving the north and south traffic lanes to either side of the EXISTING MEDIAN WHICH IS SAFE AND WIDE AT 20 FEET.

6. January 23, 2024: The full County Council voted on the recommendation of the PHP Committee to move the Parkway's north and southbound lanes to either side of the existing wide median and to use that same wide median to separate the lanes at the Capital Crescent Trail Crossing. No where is it mentioned in Parks' plans to use the EXISTING MEDIAN. This configuration must be adhered to because the county council voted for it.

7. Also at the meeting on January 23rd: Council President Friedson strongly suggested that the MoCo Parks Department move quickly to restore the north and south bound lanes to either side of the existing wide median immediately to create good will among the residents who were concerned and angry at the lack of safety with the Parkway as it is now. Nothing has been done. Why can't the Parkway be restored to either side of the wide median asap? The Parks department has changed the parkway on more than one occasion on its own volition without NCPC approval. Why can't Parks adhere to the County Council vote of Jan 23, 2023 and move the lanes and the CCT crossing, right now, to either side of the existing median? What are they waiting for? Neighborhoods are frustrated, there is too much cut through traffic and back ups because of the constricted lanes. "Vision Zero" applies to neighborhoods too. Over 5775 have signed a petition to reinstate Little Falls Parkway. At least move the two lanes to either side of the wide existing median and do it now.

8. The traffic counts do not account for the coming density in downtown Bethesda (and additional 7M sq ft left to build and that building cap could be raised in the future) and the density under construction at Westbard with 2 M sq ft of development underway and River Road named a "growth corridor". We need roads opened, that is why pavement should remain in place and be revisited when the development is complete.

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**Name:** Roger Cochetti

**Location:** Chevy Chase, MD

Please see response to attachments at the end of appendix

**Date:** March 12, 2024

Unfortunately, I will now need to regret for today's meeting. Please accept the following statement and, if possible, include it in the record of today's meeting.

Thank you

Roger Cochetti

5500 Friendship Blvd

APT 2322N

Chevy Chase, MD 20815



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## Roger Cochetti Statement on Little Falls Parkway (LFP) Plans

I've been fortunate to have lived within a mile of LFP for over 30 years and raised 2 children from our then-home a half block from Norwood Park for 10 years. I've walked along the Crescent and LFP trails and used Norwood Park hundreds -if not thousands- of times; and have driven on LFP every month for over 30 years. The proposal to eliminate the north lanes of LFP and replace them with a park is uninformed and misguided. Anyone who knows the neighborhood knows that it is already blessed with 2 marvelous parks, one of which is almost 4 acres, and 2 distinct and gorgeous hiking trails. Another hot dog-shaped park will go unused and contribute to further traffic congestion on the remaining LFP car lanes (resulting in increased auto emissions and wasted drivers' time.) Most of Norwood Park is unused most of the time or undeveloped and Kenwood neighborhood park already provides surplus play areas. Please stop wasting time and money on this needless and harmful concept and redirect your efforts to areas of the County that genuinely need more parks and play areas.

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**Name:** Ben

**Location:** Bethesda

**Date:** March 12, 2024

**Comment Noted**

I live in the Springfield/Westbard area, and I believe the traffic studies which show that 1 lane in each direction is sufficient on Little Falls Parkway. Road diets are good, and we don't need to go back to 4 lanes.

However, the speed bumps installed on Little Falls between River and Mass are unnecessarily causing traffic congestion, and I'd like to see them removed. There was not a problem prior to installation. They are a solution looking for a problem.

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**Name:** Travers Daniel

**Location:** Bethesda

**Date:** March 12, 2024

**Comment Noted**

Would you all provide some data on how much the public is using this linear park and bike lanes in general? In my experience frequently driving Little Falls Parkway I rarely see anyone using the "park". The same goes for the cordoned off lanes for bicyclists. The net effect I see is congestion, which equals pollution.

What Little Falls Parkway needs is a controlled crossing at the Capitol Crescent Trail. Currently aggressive pedestrians and bikers charge into the crosswalk without looking for cars. Some texting driver is going to kill someone.

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**Name:** James Alltman  
**Location:** Bethesda, MD  
**Date:** March 10, 2024

**Comment Noted**

I strongly object to the forced reduction of lanes on Little Falls Parkway. The reduction results in a very significant increase in the danger of driving on the Parkway, as well as crossing it. I have witnessed many near collisions and other dangerous driving activity and danger to pedestrians and bicycle riders which did not occur prior to the reduction. Moreover, I believe that there are numerous other, better ways of improving the safety for drivers, pedestrians, bicycle riders, and others. It appears that there was no consideration of those alternatives. In short the reduction has unnecessarily overall significantly decreased safety.

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**Name:** Stuart Dwyer  
**Location:** Chevy Chase MD  
**Date:** March 8, 2024

**Comment Noted**

I strongly support the reversion of Little Falls Parkway to its previous state (four lanes, two in each direction divided by a median). Absent a comprehensive, regional plan for protected bike lanes (which I would support), it is unclear where these bike lanes would lead. Once at River Road, a cyclist would be forced onto shared roadway. A cyclist was killed last year on River Road on a non-protected bike way; encouraging cyclists onto such paths is NOT the way forward. Furthermore, Little Falls Parkway already is flanked by existing protected trails -- the Capital Crescent bike trail on one side and Little Falls Park Trail on the other. At a time when in-fill residential development is occurring in the immediate environs of Little Falls Parkway (notably the Westbard development), and with the County supporting further in-fill development without presenting the ambitious sort of public transit plan truly required to deal with the congestion that will result, closing down two lanes of Little Falls makes no sense. I strongly urge the National Capital Planning Commission to reconsider this proposal.

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**Name:** John Sikking  
**Location:** Bethesda  
**Date:** March 8, 2024

**Comment Noted**

I am looking forward to understanding the county's vision for the Little Fall Parkway Improvements. I'm very interested in hearing about how green space can be improved and how Trail Traffic can be better managed with the car traffic. Currently it is an accident waiting to happen (or I should said an accident that happens about once every 6-months).

-----

**Name:** Adam  
**Location:** Bethesda, md  
**Date:** March 7, 2024

**Comment Noted**

Someone at the parks department told me that their goal was to make traffic worse to slow down traffic.. goal accomplished.. well people still speed just more dangerously now.

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**Name:** Andy O'Hare

**Location:** Bethesda, MD 20814

**Date:** March 7, 2024

**Comment Noted**

Sir/Madam,

Thank you for soliciting feedback on the road diet on Little Falls Parkway, implemented by the Montgomery County Parks Department. I have lived in Bethesda for 37 years and am extremely disappointed with the impact this diet project has had on moving through and around Bethesda. As the Parkway runs adjacent to the Capital Crescent Trail, there was never need to shrink the Parkway width to accommodate pedestrians and bikers on the Parkway. I strongly support reinstating the Parkway to its full original width and capacity as soon as possible.

Regards,  
Andy O'Hare

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**Name:** Charles Beard

**Location:** Friendship Heights, DC

**Date:** March 5, 2024

**Comment Noted**

I am not a MD resident but I walk on the Capitol Crescent Trail from River to Bethesda AT LEAST five days a week. I don't have any studies to back it up but I cannot imagine that it would be anything but more dangerous for a person on foot to stop, wait for oncoming traffic on one lane to stop, then stop again and wait for oncoming traffic on the second lane to stop. In the current two-lane, bi-directional setup a pedestrian can tell when it is safe to go the whole distance. Separate lanes with a divider just seems like it doubles the chance for a driver to decide to speed on through, putting pedestrian lives in danger in order to make the light or whatever. Please don't do this!

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**Name:** Deborah Schumann

**Location:** Bethesda, Md.

**Date:** March 5, 2024

**Comment Noted**

I ride my bike frequently all around Bethesda. When I cross Little Falls Parkway on the Capital Crescent Trail, I hardly ever see bikes or pedestrians on the roadway that is now blocked to cars. The reason is that it doesn't connect places that people need to go like the Capital Crescent Trail does where there is always quite a bit of traffic. Additionally there is a parallel pedestrian/bike route on the east side of LFP and Willett Branch which connects Dorsett Avenue to Hillandale Road, Norwood Park and Wisconsin Avenue at Bradley. It was a bad

decision to make LFP narrower for cars and it is of minimal benefit for pedestrians and bikes because it doesn't connect places that people need to go. It is a road, not a park.

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**Name:** Sarah Morse

**Location:** Chevy Chase, MD

**Date:** March 5, 2024

Section 8.5 regarding water quality and stormwater management

This is to comment of the proposed reconfiguration of the Little Fall Parkway between Dorset and Arlington. The current configuration (which I love) has two lanes north and south on one side of the large vegetated median and two abandon lanes on the other side. The original idea was to remove the pavement from these abandon lanes, giving us much needed green space on the Little Falls Parkway and adding considerable buffer to the Willett Branch which runs along the Parkway at this point.

The proposed reconfiguration does nothing to improve the stream buffer or the stormwater run-off problems that we have at the Dorset and Little Falls Parkway intersection. At my house, one house up from Little Falls Parkway, we call the intersection "Lake Somerset" in honor of the flooding that regularly occurs there. Parks will have the records, but at least one car was rescued from the intersection because of flooding. As the parkway was built entirely in the flood plain and very close to the creek, it only makes sense to fix this problem by removing the pavement on the creek-side. That would be be an "environmental improvement" of the sort that I'm hoping the study will address.

Removing the pavement, as the original plan called for, also allows for planting native trees and shrubs, and restoring the vine covered buffer - a significant retrofit for this very dense and impervious urban area. There are just not that many spots where we can remove pavement, especially creek-side.

I understand that the deal to move from the original plan was made without any environmental considerations, but that, in my mind, is shameful. The environment deserves a seat at that table and this is an opportunity to make that happen. The Parkway would never have been approved today located in the flood plain as it is. Taking out the two lanes and creating a meaningful buffer is a step to healing this wrong.

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**Name:** Jeanene Laird

**Location:** Bethesda, MD

**Date:** March 4, 2024

Comment Noted

I live near Little Falls Parkway and use it almost daily to drive my child to BCC high school in the morning. I had considered having my children bike to BCC but there is no safe route for them to bike. I always imagined LFP to be an option and wondered why there was not dedicated bike path. The proposal makes a lot of sense.

I also don't see the necessity for two lanes in both directions. This is not a busy thoroughway; I never encounter much traffic in the morning. When I do pick up my high-school child from BCC there is never much traffic in the afternoon. One lane is perfectly fine.

Now that there is only one lane when approaching the Capital Crescent Trail I find it a lot safer! I can now see pedestrians. Before with two lanes it was difficult to see anything behind the car next to me. One lane is much safer!

Many thanks for this great initiative!!

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**Name:** Jonathan Solomon

**Location:** Rockville, Maryland

**Date:** March 4, 2024

**Comment Noted**

Under the previous configuration (two lanes in each direction), I have experienced many times when drivers were going fast and did not stop at the crosswalk in question. The current configuration is a game-changer. The lack of an island (where you basically have to cross two roads) also increases safety. I believe the final decision should be data-driven. In addition to comments like mine (on either side of the issue), it is important to include crash data (pedestrian/vehicle and vehicle), speeding and other vehicle violation data, and data about any changes in travel time. Based on other similar locations, I feel confident that it will be found that the current configuration at Little Falls Parkway and the Capital Crescent Trail is safer for ALL users, has reduced traffic violations, and has a minimal or zero impact on driving times. Thanks for considering community input.

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**Name:** Dan Ginolfi

**Location:** Bethesda

**Date:** March 4, 2024

**Comment Noted**

Do any of you live here? No, you don't, yet you're making decisions for those of us that do. I drive on this road every single day. I see at most one person walking on the closed side of little falls per day. You have shut down an entire roadway for no purpose and you have enraged hundreds of local residents at the same time. This doesn't improve Bethesda, it makes it more congested and frankly more dangerous. This committee is incoherent and incompetent and you should listen to the people who live in the community you're screwing with.

---

**Name:** Anthony Kane

**Location:** Bethesda MD

**Date:** March 4, 2024

**Comment Noted**

I walk and drive on the parkway, but I REALLY wish it would go back to four lanes. I have seen so many near accidents and experienced long backups, when, for example somebody wants to turn left onto Hillandale. The 25 mph speed limit between Dorsett and River is also ridiculous,

nobody pays attention to it so when I'm driving and trying to stay at the speed limit I do not feel safer.

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**Name:** Nikki L  
**Location:** Bethesda MD  
**Date:** February 29, 2024

Comment Noted

I understand reducing the lanes but I personally don't want the space to be replaced by building development/s. I want us to retain the park, stream and all the nature that belongs there. We don't need another apartment or commercial development.

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**Name:** Joseph Geraci  
**Location:** Bethesda, MD  
**Date:** February 29, 2024

Comment Noted

There is NO sound or valid statistical data that supports the Parks Dept position. There are NO sound and valid cost-benefit analyses that support the Parks Dept position. So. How can they propose anything that makes sense other than spending other citizens taxes on their gut feelings? What's left is status quo prior to the Parks Dept "experiment". Focus on the Cap Crescent Trail instead of this major vehicle artery that links downtown Bethesda to the outlying and rapidly growing communities. Safety was realistically, a non-issue prior to their intervention, with most likely an extremely low probability of harm given the volume of use.

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**Name:** Patrick  
**Location:** Bethesda, MD  
**Date:** February 29, 2024

Comment Noted

Make Little Falls Parkway two lanes on both sides as it was in the past. There are too many cars during rush hour for one lane.

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**Name:** Tom Olson  
**Location:** Overbrook Road, Bethesda  
**Date:** February 29, 2024

Comment Noted

I strongly encourage you to develop non-auto uses of the parkway area. Concerns about traffic are massively overblown. Providing opportunities for walkers, runners, and bikers to get out and enjoy the world are much more important than any minor potential traffic delays.

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**Name:** Charles Sullivan  
**Location:** Bethesda  
**Date:** February 29, 2024

Comment Noted



I am strongly against changing any part of Little Falls Pkwy. The idea of a linear park will not be used and is a waste of money. I bike this area frequently and I've never seen anyone using the now closed asphalt lane. Reducing lanes for vehicular traffic is dangerous and causes backups elsewhere. Reducing lanes also hurts emergency response. The two lanes in each direction allows drivers to enjoy a calm ride through the park. It allows drivers to avoid hitting animals. The road was designed for current and future traffic, and we know traffic will increase. This is a classic case of a solution in search of a problem. It is apparent there are many who feel this way. Why not use these funds to solve problems where the community is in agreement.

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**Name:** LISA L LAWLER

**Location:** BETHESDA, MD

**Date:** February 29, 2024

Comment Noted

I think the proposed changes to Little Falls Parkway are a huge waste of money. Very few people use the closed portions of the Parkway and it has been a huge eyesore for years now. If people want outdoor space for ricing and walking they can use the Capital Crescent Trail or Norwood Park. To prevent accidents at the crosswalk for the trail you could just put in a stop sign

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**Name:** Jane Lyons-Raeder

**Location:** Silver Spring, MD

**Date:** February 29, 2024

Comment Noted

I support measured to make Little Falls Parkway more safe, especially for non-motor vehicles.

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March 29, 2024

Comments are wide ranging and addressed throughout the draft EA.

Michael Weil, Urban Planner  
National Capital Planning Commission  
401 Ninth Street, NW  
Suite 500  
Washington, DC 20004

**SUBJECT: Comments on the Little Falls Parkway Environmental Assessment**

Dear Mr. Weil:

On behalf of the Citizens' Coordinating Committee on Friendship Heights (CCCFH), which represents 18 communities with nearly 20,000 residents surrounding Little Falls Parkway, and the Little Falls Parkway Neighborhood Coalition (Coalition), we appreciate this opportunity to submit comments relating to the Little Falls Parkway (LFP) Environmental Assessment (EA).

The National Capital Planning Commission (NCPC) is required to determine if recently proposed changes to LFP, as recommended by the Montgomery County, MD Parks Department (Parks Department or Parks), (1) are consistent with park use and provide a park benefit, as well as to (2) take a hard look at environmental concerns pursuant to the National Environmental Policy Act (NEPA).

CCCFH and the Coalition believe that in conducting and drafting the EA, NCPC needs to consider the many flaws and disconnects in the plan that the Montgomery Parks Department has presented. As members of the public who use Little Falls Parkway every day, we are compelled to point out these many flaws with the hope that NCPC will recognize them and convey them in the EA, so as to cause the Parks Department to correct them, while remaining within the configuration mandated by the County Council's (two opposing lanes of vehicle traffic, divided by the existing grass median configuration north of Dorset Avenue and retention of outer lanes of pavement along those vehicle lanes to Hillandale Road.) This letter also provides important background on community views of the proposed plan, which we hope will inform NCPC's deliberations and determinations, as well as the final content of the EA.

Safety and Vision Zero

Safety and the implementation of Montgomery County's Vision Zero policy are key concerns for CCCFH, the Coalition and LFP's users. Under the Vision Zero policy, Montgomery County seeks to eliminate traffic fatalities and severe injuries on its roadways by 2030.

While safety is mentioned numerous times in the Parks presentation and in the responses to questions provided by Parks Department representatives Kyle Lukacs and Andrew Tsai at the March 12, 2024, NCPC Scoping Meeting, the implementation of

Vision Zero, which was touted throughout the presentation to the Montgomery County Council, is barely mentioned. The Parks Department proposal needs to define explicitly what is meant by safety and whether the definition of safety complies with Montgomery County's Vision Zero policy of eliminating traffic fatalities and severe injuries by 2030. As detailed below, a broad range of safety concerns needs to be considered in the EA, including whether Parks' proposed roadway changes are appropriate and sufficient to meet defined safety and Vision Zero objectives.

It should be noted that Slide 13 of the Parks Department's presentation raises questions about the adequacy of the objectives set. According to Slide 13, the "Purpose" of these changes is: "To reduce the potential for collisions between autos and vulnerable roadway users on foot or bicycle who **cross** (our emphasis) Little Falls Parkway." So, if you don't cross LFP, but just walk or ride your bike on one side of the roadway, say on the northbound side between Dorset and Hillandale, the potential for a collision between a biker or pedestrian and an auto won't be reduced? Clearly, there needs to be an expansion of the Purpose of the Parks' proposal.

The "Need" as expressed on Slide 13 is also questionable. "Based on a history of serious injury and fatal crashes between Capital Crescent Trail users and vehicles traveling along Little Falls Parkway, as well as policy objectives adopted by the Montgomery County Council and the Commission."

The language of Slide 13 makes it sound as if there were many fatal or serious crashes at the crossing by Little Falls Parkway and the Capital Crescent Trail, which has not been the case. A more detailed analysis reveals the following:

- There have been only three serious crashes and one fatality on Little Falls Parkway - a total of four incidents - in the eight years from 2015-2022, or an average of .5 incidents annually. As this suggests, Little Falls Parkway is well on the way to achieving Montgomery County's Vision Zero goals, raising the question of whether the "Need" articulated by the Parks Department is accurate.
- While the single fatality on Little Falls Parkway occurred at the Capital Crescent Trail, the cause of that accident appears to have been mitigated effectively by a 2017 road diet that is largely unaffected by Parks' new proposal for the Parkway. This matter is discussed at length below and underlines the question of whether Parks' 2024 plan addresses an actual Need.
- A majority of the accidents along Little Falls Parkway have not taken place at the Capital Crescent Trail crossing. Instead, these incidents, as discussed below, have occurred at intersections that are not the focus of the Parks Department's proposal for Little Falls Parkway. The extent to which Parks' proposal will actually enhance safety for users of the Capital Crescent Trail should therefore be evaluated further in the EA.

#### Safety at the Intersection of Little Falls Parkway and the Capital Crescent Trail

To date, there has been only one fatality at the intersection of Little Falls Parkway and the Capital Crescent Trail crossing. The fatality occurred in 2016, when a person on a recumbent bicycle **lacking a raised flag** was hit by a driver in an SUV who could not



see him in front of her vehicle. In response to that fatality, the Parks Department instituted a road diet at the Capital Crescent Trail in 2017, reducing LFP from 4 to 2 lanes northbound from Hillandale Road. There have been no subsequent fatalities, suggesting that the 2017 road diet has been successful. It is therefore uncertain that Parks' 2024 proposal for Little Falls Parkway, as currently constituted, will enhance safety for the users of the Capital Crescent Trail.

Data concerning serious crashes at the Capital Crescent Trail suggest similar conclusions. Since Parks' institution of the 2017 road diet and through 2022 (the most recent records publicly available), there have been no serious crashes at the intersection of LFP and the Capital Crescent Trail crossing, and only **one** minor crash, with a pedestrian in 2022. As this suggests, the 2017 road diet northbound on LFP from Hillandale Road has been successful at improving safety for users of the Capital Crescent Trail.

It should be noted, however, that the 2022 pedestrian accident took place **after** the Parks Department instituted Phase I of its pilot project to expand the LFP road diet from Hillandale Road south to Dorset Avenue. It is therefore unclear that extending the LFP road diet south from Hillandale Road to Dorset Avenue, as proposed in Parks' latest plan, will itself enhance safety at the intersection of Little Falls Parkway and the Capital Crescent Trail. The EA should therefore carefully examine the safety improvements proposed for the Capital Crescent Trail to ensure that safety is truly improved for Trail users, consistent with Montgomery County's Vision Zero goals.

#### Conditions at Intersections from Arlington Road to Dorset Avenue

While the 2024 Parks proposal focuses on conditions along LFP **between intersections**, it should be noted that an estimated two-thirds of the collisions on Little Falls Parkway between Arlington Road to Dorset Avenue (the area of the 2017 and proposed 2024 road diets) occur **at intersections**. Between 2015 and 2022, 30 of the 45 collisions on Little Falls Parkway (67%) occurred at the Dorset Avenue, Hillandale Road and Arlington Road intersections:

- The intersection of Little Falls Parkway and Arlington Road has been most problematic – 16 minor and 1 serious crash there, with 5 bicyclists and 1 pedestrian involved in those incidents.
- The intersection of Little Falls Parkway and Dorset Avenue is another crash-prone area with 9 incidents between 2015-2022. Two of those crashes involved bicyclists, but all of the collisions resulted in minor injuries.
- The intersection of Little Falls Parkway and Hillandale Road was the site of 4 accidents. Conditions on Hillandale Road are discussed in greater depth below.

Because LFP accidents are most prevalent at intersections, the EA should evaluate whether the 2024 Parks proposal sufficiently addresses safety needs in those areas.

#### Connectivity and Safety Northbound

Northbound along LFP from River Road the safety issues are again at the intersections. These safety issues are exacerbated or not addressed in the Parks proposal.

Dorset Avenue. At Dorset Avenue, there are numerous vehicles that turn into the right lane as if to turn right into Somerset, only to realize they need to be in the middle lane to continue on LFP. The signs for the right turning lane at Somerset need to be placed earlier so that drivers know to be in the middle through lane.

In addition, at a March 19, 2024 community meeting sponsored by CCCFH and held at Somerset School, with Mr. Lukacs and Mr. Tsai of the Parks Department, several community members complained about the inability to make left-hand turns from both the north and southbound lanes of LFP at Dorset Avenue, even though there are left-turn lanes. With through traffic in each direction corralled into one lane, during peak travel hours there is rarely a break in traffic from the opposite direction while the traffic signal is green, and consequently it's difficult for drivers to make left turns safely. Timing for signals is important in this case in order to prevent collisions and meet the Vision Zero goals of the County. But signals alone cannot solve all the problems, as an unintended consequence of an iterative signal sequence is traffic backups, which are both problematic and spawn unsafe driving.

In addition, several residents of Somerset complained about the turning radius to make a right-turn from the east side of Dorset Avenue into northbound through traffic onto the parkway. With only armadillo lane delineators and striping to distinguish between the closed off northbound lane which is intended to be used only for emergency vehicles, will drivers unfamiliar with LFP realize this is not a through lane? Will pedestrians realize this is not a walking path? These concerns need to be assessed in the EA.

Hillandale Road. Moving further north, at Hillandale Road, there were only 4 collisions from 2015-2022, all occurring between 2018-2020. There is concern, however, that with the removal of pavement on LFP in front of the pool and the narrowing and possible closure of the entrance/egress along LFP for emergencies only, more collisions near or along Hillandale could result. The EA should evaluate these conditions, as well as alternatives to ensure the safety of entrances and exits to the Bethesda Pool. Separating entrances and exits might enhance safety, and entrance and exit points should not interfere with the lane narrowing for the CCT road diet to minimize the possibility of conflicts between walkers and vehicles.

As has been pointed out to Parks, many people walk from the Little Falls Trail on the south side of Hillandale to the pool and through the pool parking lot to make the connection with the CCT. This connection, they've complained, is not safe. Could a sidewalk along the edge of the pool property along Hillandale, coming around the corner to LFP where pavement will be removed and then connecting to the CCT path provide this safe haven for walkers? Although not specifically in the Parks Department proposal, if safety is a priority, this should be seriously considered. As it is now, on busy weekends during the summer, people park along the grassy area by the pool on the north side of Hillandale. What will prevent people from doing the same along the grassy area the Parks Department plans on developing along LFP? These problems need to be examined in the EA.



Arlington Road. Arlington Road and the LFP intersection are where most of the collisions occur between vehicles, bikers and pedestrians. While the Parks Department has talked about better connectivity between the CCT and the pool and the parking lot for the Little Falls Stream Valley field just north of Arlington Road, for safety reasons community members have again asked if a sidewalk from the north side of Arlington Road could extend along the edge of the parking lot and continue to Fairfax Drive and the Fairfax Court Apartments. If the objective of Parks is to provide connections for community members to go to nearby parks and recreation facilities, then the connections should be easy and safe for children accompanied by their parents.

The intersection at LFP to Arlington Road also offers some challenges for drivers. Although the Parks Department plans on providing a right turning lane, they claim that 6-7 cars could stack in that area. Community members viewing this intersection do not see more than four cars stacking between this intersection and the enhanced CCT crossing. There was also discussion at the March 19 meeting of putting a "no right turn on red" sign at this intersection to allow walkers to safely cross. How any of these changes will affect both traffic congestion and safety needs to be carefully studied both now and after implementation and changes should be made as appropriate to ensure pedestrian safety and a smooth flow of traffic.

#### NCPC Approval before Engineering Plans Completed?

While we understand that NCPC has "accelerated the review process," we are baffled that NCPC could approve "50-75% of construction drawings" by the proposed action date in June, in light of the many outstanding safety issues. Isn't it important for the Parks Department to get the issues of safety and connectivity 100% correct before the NCPC approves its plans?

We would like to know how, if at all, any of the proposed changes by Montgomery Parks will be reviewed to determine if safety for all users – drivers, bicyclists and walkers will be assessed within a reasonable timeframe now and after changes are made.

Finally, we appreciate that the plastic orange bollards and flex sticks that now line Little Falls Parkway will be removed when the proposed permanent changes will be made. The aesthetic beauty of this small stretch of Little Falls Parkway has been significantly marred by these temporary changes and, coupled with Parks' transformation of the LFP to an obstacle course, has decreased the safety and viability of driving the current LFP.

#### Community Views of the Proposed Changes

While we hope the new changes will be less problematic from visual and safety perspectives, for the most part community members are disappointed that the Parks Department, the Montgomery County Planning Board and the Montgomery County Council did not acknowledge that most residents in our area would prefer Little Falls Parkway to return to **four lanes between Hillendale Road and Dorset Avenue, with the road diet by the Capital Crescent Trail retained for safety.** We see little or no need for a bike path measuring under four-tenths of a mile that does not smoothly and safely connect to the CCT and we do not agree with Parks' statement that "Little Falls Parkway is not considered a means of principal conveyance, but (Parks) acknowledges

that is an important road for people to travel back and forth in the area.” (Scoping Meeting, 15:58).

It is important to note that widespread community opposition to the narrowing of Little Falls Parkway between Hillandale Road and Dorset Avenue is substantiated by public comments collected by Parks and the Montgomery County Council at the end of 2023. As shown in the attached comment analysis conducted by CCCFH (attached), 1251 unique respondents submitted 1272 comments on the proposed LFP reconfiguration. **74.2%** of the comments supported a return to a four-lane configuration. **80.2%** of respondents who lived in adjoining zip codes – identified by the County as the primary users of Little Falls Parkway – supported a return to four lanes from Hillandale Road to Dorset Avenue. Commenters noted, as we do, that the area surrounding LFP is already served by extensive recreational spaces that will not be materially improved by a significant reduction in road capacity in exchange for the addition of a bike lane measuring under four-tenths of a mile, as discussed below.

When Little Falls Parkway was developed with Capper-Crampton funds in the 1950's perhaps it was not meant to be a “principal conveyance,” but a park road to be enjoyed during a Sunday drive. In the 70 years since the roadway was built the southwestern area of Bethesda has seen and will continue to see a substantial increase in development and LFP has become an essential connector road between downtown Bethesda and River Road (to head west to the Beltway) and Massachusetts Avenue (to head east to downtown D.C). LFP also connects to parking for the Capital Crescent Trail, which opened in 1996, the parking lot at the Bethesda Pool and the parking lot at the Little Falls Stream Valley field just north of Arlington Road. We therefore want to register, as we have before, our continued opposition to these proposed permanent changes, which mar what was once a pleasant and convenient stretch of road for diverse purposes.

In short, the plans that Parks has proposed are incomplete and inconsistent with public needs and fundamental safety purposes along the entire 0.4-mile segment of LFP recommended for reconfiguration. The plans include many flaws as further described above. We hope that NCPC will consider public opinion and call for appropriate changes before considering its approval.

Sincerely,

*David S. Forman*

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Chair, Citizens Coordinating Committee for Friendship Heights  
Steering Committee Member, Little Falls Parkway Neighborhood Coalition  
5344 Falmouth Road  
Bethesda, MD 20816  
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More than a thousand residents responded to the Montgomery County Council’s invitation to submit their views on the future of the Little Falls Parkway on a Wufoo web link. The original mass of data in the County Council Packet was unorganized and difficult to review and there was minimal analysis in the Staff Report. Leanne Tobias and David Forman have analyzed the responses, and the results are shown in the table below. As the Staff Report noted, zip codes 20814, 20815, 20816, and 20817 are the communities adjacent to Little Falls Parkway, so responses from those closest neighborhoods were tallied separately. The results are clear: **a large majority of residents in those neighborhoods (80%) strongly opposed the Parks proposal and supported a return to the pre-pandemic configuration** (two vehicle travel lanes from Arlington Rd. to Hillandale Rd. with a wide median in the CC Trail Crossing, and four vehicle travel lanes from Hillandale Rd. to Dorset Ave. with the existing median).

**LITTLE FALLS PARKWAY SURVEY (WUFOO)**

1251 unique respondents  
 1272 responses on LFP configuration; some respondents had multiple preferences

WHO RESPONDED?	Number	%
1251 unique respondents		
Zip Code		
20814	72	5.8%
20815	441	35.3%
20816	578	46.2%
20817	67	5.4%
Zip codes 20814, 20815, 20816, 20817	1158	92.6%
Other zip codes (MD, DC, VA, Other)	93	7.4%
Total unique respondents	1251	100.0%

FUTURE OF LITTLE FALLS PARKWAY	Number	%
1272 total responses; some respondents gave multiple answers		

RETURN TO 4 LANES		
Zip codes 20814, 20815, 20816, 20817	929	73.0%



Other zip codes (MD, DC, VA, Other)	15	1.2%
<b>Total return to 4 lanes</b>	<b>944</b>	<b>74.2%</b>

#### **PARKS PROPOSAL (2 LANES)**

Zip codes 20814, 20815, 20816, 20817	173	13.6%
Other zip codes (MD, DC, VA, Other)	100	7.9%
<b>Total support for Parks proposal</b>	<b>273</b>	<b>21.5%</b>

<b>COUNCIL ALTERNATIVE (2 LANES)</b>	<b>24</b>	<b>1.9%</b>
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<b>UNCLEAR/NO PREFERENCE/OTHER</b>	<b>31</b>	<b>2.4%</b>
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<b>TOTAL RESPONSES</b>	<b>1272</b>	<b>100.0%</b>
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#### **ZIP CODES 20814, 20815, 20816, 20817 ONLY (1158 unique respondents)**

<b>Respondents supporting 4 lanes</b>	<b>929</b>	<b>80.2%</b>
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<b>KEEP ASPHALT, DON'T TEAR UP (specific mention, 1251 unique respondents)</b>	<b>432</b>	<b>34.5%</b>
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Response to the County Council's request for comments came mostly (92.6%) from the zip codes immediately surrounding Little Falls Parkway. Support for the Parks plan was overwhelmingly unpopular—80% of the responses from these neighborhoods opposed the Parks-approved plan and expressly requested a return to the pre-pandemic configuration of the parkway (two lanes from Arlington Rd. to Hillandale Rd. with a wide median in the Capital Crescent Trail crossing and four lanes from Hillandale Rd. to Dorset Ave. with the existing median). In contrast, among those who expressed support for the Parks-approved current configuration, 63% were from the adjacent neighborhoods but 37% were from other zip codes. Only 2% of respondents supported the County Council-requested Alternative.

Although whether to tear up the unused asphalt was not an explicit issue, 432 respondents specifically mentioned their opposition to removing the asphalt. (Opposition was implicitly greater, however, since a return to 4 lanes would inherently leave the pavement intact.)

Many of the responses were brief and may have copied proposed language from campaigns for or against the Parks proposal. However, a substantial number of respondents took the time to provide detailed explanations for their positions. The following reasons were given by multiple persons who opposed the Parks configuration and requested a return to four lanes:

- The current configuration is unsafe for cars facing oncoming traffic and for persons crossing the road, and four lanes with a wide median would be safer.
- The current configuration is unsafe for emergency vehicle use.
- The current configuration is confusing, especially at night.
- Many respondents who frequent the parkway noted that they rarely see anyone bicycling or walking in the closed lanes. There are two trails immediately adjacent to the Parkway that are much more attractive.
- The neighborhoods surrounding the Parkway contain multiple fine parks, trails, and green space. There is no need for this project.
- Little Falls Parkway is an important arterial road connecting to downtown Bethesda, and its utility as a roadway should not be impaired for the recreational convenience of a small minority.
- Extensive development is planned nearby, and the roadway should not be reduced until the amount of increased traffic is known.
- The proposed Parks plan is expensive, and the funds could be used more productively to maintain and repair park infrastructure.
- The current configuration is extremely unpopular in the surrounding community. The Parks plan should not be implemented in the face of so much opposition from the immediate neighborhoods.
- The process by which the Parks plan was proposed and developed without seeking public input in advance of preparing a proposal. It was undemocratic and ignored public sentiment and needs.



MONTGOMERY COUNTY FIRE AND RESCUE SERVICE

Marc Elrich  
*County Executive*

Scott E. Goldstein  
*Fire Chief*

3/16/2023

This letter was superseded by a letter of September 27, 2023 from Interim Fire Chief John Kinsley

Good Afternoon,

This letter is in regard to a concern brought to me by residents whom reside in the neighborhood area of Little Falls Parkway. Their specific concern is the newly constructed bike and pedestrian crossing area on Little Falls between Arlington Rd and Hillendale Rd. I was contacted because I am the Assistant Chief of the Safety Section for Montgomery County Fire and Rescue and I was asked to analyze the current crossing configuration for any hazards or concerns.

I have visited the area and watched multiple videos of that crossing and these are what I see as potential Hazards or concerns.

- The removal of the median strip that was previously in place between the 2 lanes of traffic exposes pedestrians and cyclists to an opposing traffic pattern. This leaves users no place of refuge as they cross. The previous configuration allowed people who used the crossing to focus on one vehicle at a time from a single direction.
- The different heights of vehicles that pass through the crossing create a situation where there is dynamic or constantly changing blind spots. These blind spots effect the motorists, the cyclists, and the pedestrian traffic equally. The intermittent line of sight combined with the opposing vehicle traffic can be problematic.
- With the recent adaptation of a narrowed street configuration prior to the crossing there is potential for emergency response vehicles to avoid that area during heavily congested hours of the day. This could result in emergency vehicles as well as civilian commuter traffic utilizing neighborhood streets to reach their destinations in the quickest way possible.

**Health & Wellness Section**

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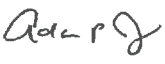
100 Edison Park Drive, 2<sup>nd</sup> Floor • Gaithersburg, Maryland 20878-3204  
240-777-2219 • 240-777-0725 TTY • 240-777-2443 FAX  
[www.montgomerycountymd.gov](http://www.montgomerycountymd.gov)

MCFRS drivers are trained professionals and have multiple hours of training on responding to emergencies in a safe and timely manner. Conversely, it is not a good practice for commuters, who we know are already distracted to navigate through residential neighborhoods trying to circumvent traffic slowdowns.

I do realize there are multiple issues associated with traffic movement and pedestrian crossing. At a quick glance, it would seem that a pedestrian bridge would alleviate many of these issues. However, I do realize there are many factors that go into making these complex decisions.

Thank you for taking the time to ask the Safety Section of Montgomery County Fire and Rescue to weigh in on this important community concern. Please understand MCFRS will always respond to the call of the community in a timely, safe, and professional manner. If I can be of any further assistance, please feel free to contact me directly.

Respectfully,

Adam P. Jones   
Assistant Chief  
Occupational Health and Safety  
Montgomery County Fire and Rescue Service  
14935B Southlawn Lane, 2<sup>nd</sup> Floor  
Rockville, MD 20850  
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Capital Crescent T  
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BEFORE THE NATIONAL CAPITAL PLANNING COMMISSION

LITTLE FALLS PARKWAY IMPROVEMENTS

COMMENTS ON ENVIRONMENTAL SCOPING

BY: LLOYD GUERCI

MARCH 26, 2024

Comments are wide ranging and  
addressed throughout the draft EA.

**THE LOCAL ENVIRONMENT**

The proposed Little Falls Parkway Improvement Project involves an approximately 0.4-mile section of the Little Falls Parkway. Overall, from south to north, the Little Falls Parkway (a) from Massachusetts Avenue to River Road is a two-lane road, with a series of three speed bumps; (b) from River Road to Dorset Avenue is a four-lane road, with the two north bound lanes separated from the two south bound lanes by a wide grass median; and (c) from Dorset Avenue to Arlington Road was a four-lane road and north of Arlington Road was a two-lane road to Fairfax Road, but this segment was modified by M-NCPPC/Montgomery Parks (sometimes referred to herein as “Parks”) in 2017 to a two-lane road diet at the Capital Crescent Trail crossing of the Parkway and in 2022 to two lanes in its entirety on an interim basis. There are no speed bumps on the Parkway north of River Road. Montgomery Parks’ application to National Capital Planning Commission (NCPC) pertains to the section of the Parkway from Dorset Avenue to Fairfax Road.

The Little Falls Parkway from Dorset Avenue to Fairfax Road serves multiple purposes. On the Parkway, there is blended traffic that includes people driving to the parking lots at the Bethesda pool and on the Parkway just north of Arlington Road with their bicycles and getting on their bikes to go onto the Capital Crescent Trail, people driving to the parking lot north of Arlington Road to go the soccer field (Stream Valley Park 2, Soccer Field 1), people driving to the Bethesda pool and people going to and from Bethesda, Kenwood and Somerset.

Paralleling, approximately, the Little Falls Parkway between Dorset Avenue and the area of the Capital Crescent Trail crossing of the Parkway are two trails. To the west of the Parkway is the very popular Capital Crescent Trail. It crosses the Little Falls Parkway near the county’s Bethesda pool and crosses Dorset Avenue about 400 feet west of the Parkway. To the east of the Parkway is Montgomery Parks’ Little Falls Trail. In this section, the Little Falls Trail begins near the corner of Dorset Avenue and the Little Falls Parkway and ends at about Hillandale Road, to the east of the Bethesda Pool. It has a blacktop surface and is slated for repair.



The Willett Branch runs south essentially from Bethesda and flows into the Little Falls Branch south of River Road. In the immediate area of Montgomery Parks' proposed project, the main fork of the Willett Branch runs east of the Parkway from south of Hillandale Road, under a Parkway bridge between Hillandale Road and Dorset Avenue and then to the west of the Parkway, and under Dorset Avenue between the Parkway and the Capital Crescent Trail. Another fork flows from west of the Parkway, through a culvert south of Hillandale Road and into the main fork. A local website shows the overall watershed, with the Willett Branch draining a northern area. <https://www.lfwa.org/explore>. In the area near the 0.4-mile section of the Parkway that Montgomery Parks seeks to modify, the Willett Branch resembles a concrete half pipe. That design likely is attributable to the large volume of water from runoff that passes through it in storms. A considerable part of that runoff has been associated with development allowed by M-NCPPC. Unfortunately, the Willett Branch suffers a serious fecal pollution problem. <https://www.lfwa.org/updates/area-stream-have-a-serious-fecal-bacteria-problem>.

There are several significant recreational facilities in the area near the Little Falls Parkway. These include the Capital Crescent Trail, the Bethesda pool, Stream Valley Park 2 - Soccer Field 1, and Norwood Park which is about 17 acres. A blacktop pathway connects Norwood Park to the Little Falls Trail. To the dismay of many people, areas to the north and south of the Parkway with substantial development and growing populations lack adequate parks. These include Westbard and downtown Bethesda.

## **STATEMENT**

On October 16, 2016, bicyclist Ned Gaylin was struck and killed by a motor vehicle on the Capital Crescent Trail crossing at the Little Falls Parkway. Thereafter, in or about January 2017, on an interim basis, Montgomery Parks instituted a "road diet" on the Little Falls Parkway at the crossing, closing off the outer lane in each direction.

In 2018, the Parks Department considered three alternatives for the Capital Crescent Trail crossing: (1) a bridge over the Little Falls Parkway, returning the Parkway to four lanes; (2) move the Capital Crescent Trail crossing to the intersection of Arlington Road and the Parkway where there was and is a traffic signal and returning the Parkway to four lanes; and (3) a permanent crosswalk with the road diet. In June of 2019, the Montgomery County Planning Board met and supported moving the crossing to the traffic signal at Arlington Road and opening



the Parkway to four lanes, in coordination with County's Vision Zero plan. Some Planning Board Commissioners questioned that the Parks Department's slanted cost analysis. That September, at a work session on the Parks budget for the County's Capital Improvements Program, the Planning Board voted to defer for 6 years the decision to move the Capital Crescent Trail crossing to Arlington Road for budgetary reasons.

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic. On March 16, 2020 then President Trump issued guidelines urging people to avoid social gatherings of more than ten people and to restrict discretionary travel. With many people staying home, in April of 2020, the Montgomery Parks closed the Parkway to vehicles 24/7 and initiated an Open Parkways program, for residents to walk outside with distance from others. As a result of the closure of the Little Falls Parkway, nearby communities including Kenwood (which lacks sidewalks) and Somerset, experienced significant and dangerous cut-through traffic. In October of 2021, Parks reopened the Little Falls Parkway from River Road to Arlington Road but only on weekdays. The road diet at the Capital Crescent Trail crossing continued in place.

In the time period following mass vaccinations for COVID and a return to normalcy, Montgomery Parks seized upon closing some of the Little Falls Parkway roadway and converting it to a recreational use. In a meeting in March of 2022 with Montgomery County Councilmember Friedson and representatives from several communities, Montgomery Parks acknowledged plans to close part of Little Falls Parkway for a linear park. In about May of 2022, Parks implemented a so-called Phase I pilot project configuration for the Parkway, retaining the road diet at the Capital Crescent Trail crossing and, beyond that, closing one lane each of the previous southbound and northbound lanes while retaining the grass median between the operational lanes.

In October of 2022, Montgomery Parks presented yet another *fait accompli* (consistent with its institutional practice of act first; create an appearance of public participation later), with this announcement:

October 10, 2022

[Announcements & News, Press Releases](#)

*The project aims to develop a linear park on two lanes of the four-lane parkway.*

WHEATON, Md. – [Montgomery Parks \(opens in a new tab\)](#), part of The Maryland-National Capital Park and Planning Commission, will again

reconfigure lanes on [Little Falls Parkway \(opens in a new tab\)](#) for [Phase Two of the pilot project \(opens in a new tab\)](#) to repurpose two lanes of the parkway between Arlington Road and Dorset Avenue and create a linear park. Work is scheduled to begin on Monday, October 17, 2022. The new park will add much-needed recreational space in an area where land is at a premium, and adjacent to the Capital Crescent Trail – one of the most popular trails in Montgomery Parks’ system. . . .

On its website Parks said “Why is this being done?” Its answer was in part that “[i]n Phase 2, the capacity of the road will remain as it is under the current pilot project as a two-lane road, but the shifting of lanes will free up space to create a linear park.” <https://montgomeryparks.org/projects/directory/little-falls-pilotproject/> (emphasis added). Figure 13 (p. 14) of Parks’ Memorandum, “Pilot Project Phase II Typical Section” shows the previous southbound lanes closed and a “Linear Park” there. [March 30 Memorandum to the Planning Board p. 14; see Appendix D](#) to the Montgomery County Planning Board Agenda of March 30, 2023, Linear Park Concept Exhibits including an overhead aerial map and images of people at a park.

There was a huge outcry of public distress over Parks’ actions, including both the closure of the Parkway that led to cut-through traffic in neighborhoods (with children, without sidewalks) and the lane reductions. And, there was massive public opposition to the unneeded linear park.

At long last, on March 30, 2023, the Montgomery County Planning Board held a hearing on the Little Falls Parkway. Before the Planning Board, there was unrefuted testimony relating to the purpose of the Parks Department’s project. Malcolm O’Hagen from the Kenwood community testified: *“I asked the question (of the Parks Dept), what is the problem you are trying to solve”, Parks replied “there is no problem, we are doing this because some people would like to see more park area”.* March 30, 2023, Hour 10:23:28. At the March 30th Planning Board hearing, 71% were against the linear park and, also, opposed north-south Parkway lanes with no median. Those against Parks’ plans wanted the 4 lanes restored. Fire Chief in charge of safety (Adam Jones) wrote a letter of March 16, 2023 highlighting the unsafe crossing.

By the time of this hearing, Montgomery Parks did a switcheroo. It concocted a new purported justification for the Phase 2 reduction of the Parkway to two adjacent lanes, one lane in each direction, without the median between them; it wrapped itself in the flag of safety - speeding. There was no discussion of the characteristic of the Parkway between Dorset Avenue and Hillandale Road as a no access divided highway, no discussion of its design speed, no analysis of past

crashes between Dorset Avenue and Hillandale Road (very few; none fatal), and no speed management to reduce speeding by measures such as speed bumps, which exist on the Parkway south of River Road. There had not been enforcement such as by speed cameras.

The Planning Board approved Parks' plan for the 0.4-mile segment of the Parkway, with some suggested adjustments.

#### Consideration by the Montgomery County Council

The Montgomery County Council received an enormous volume of well-founded complaints from residents about and opposing Parks' Little Falls Parkway project. This included a petition which has grown to over 5,000 signatures. It took up the matter at a Council session on May 8, 2023. The Council voted 10-1 to in favor of an amendment to M-NCPPC's FY-2024 capital budget relating to construction of a permanent road diet and the creation of a linear park along the closed traffic lanes, without Council review and approval:

Any realignment of the remaining two lanes between Dorset and Arlington on Little Falls Parkway must be reviewed by the Council before funds may be used for this purpose. No funds may be used for the implementation of a linear park in this section of the Little Falls Parkway.

Montgomery Parks returned to the Montgomery County Council in November of 2023. At the Council's request, Parks presented to the Council's Planning, Parks, and Housing Committee, two options referred to as: (1) the Planning Board - Approved Configuration, a two-lane Little Falls Parkway from Dorset Avenue to Arlington Road with both lanes adjoining one another on the east side of the previously established median, and a (2) Council-Requested Alternative Option that retained the grass median between the northbound and southbound lanes of the Parkway, as it existed before October of 2022. The Council Committee recommended the Council-Requested alternative with the grass median between lanes.

On January 23, 2024, the Montgomery County Council approved the configuration of a two-lane Parkway north of Dorset Avenue with the two lanes separated by the well-established and long-existing grass median and retention of pavement of closed lanes.

## **PURPOSE AND NEED**

A statement of purpose and need was included at slide 13 of NCPC's scoping session on March 12, 2024. It said (<https://www.ncpc.gov/videos/623/>):

**Purpose:** to reduce the potential for collisions between autos and vulnerable roadway users on foot or bicycle who cross Little Falls Parkway.

**Need:** based on a history of serious injury and fatal crashes between Capital Crescent Trail users and vehicles travelling along Little Falls Parkway, as well as policy objectives adopted by the Montgomery County Council and the Commission.

This statement of purpose and need must be rewritten substantially. Among its many shortcomings, it is too narrow - the purpose focuses only on "cross[ing] the Little Falls Parkway"; the need is based only on "serious injury and fatal crashes between Capital Crescent Trail users and vehicles travelling along Little Falls Parkway" and an opaque reference to unspecified policy objectives. (As a narrow point, fatal crash should have been in the singular.)

Based on the political resolution, but not the data or sound analysis, I am resigned to the Little Falls Parkway, between Dorset Avenue and Fairfax Road, becoming a two-lane, divided by a wide grass median, road with a refuge island at the Capital Crescent Trail crossing, for the immediate future. Like thousands of other local residents, I believe that the safety problem, which was real, was solved by a road diet at the Capital Crescent Trail crossing, and that the pending improvements project before the NCPC is a waste of money – money that should be used for parks in Bethesda or Westbard where there is huge growth and significant shortages of parks. But I do not expect NCPC, given its charter, to address the wisdom of this expenditure.

There are aspects of this proposed project that, for safety reasons, require analysis in the EA and adjustments. The two-lane configuration and other improvements proposed by Montgomery Parks introduce many safety issues that must be addressed.

The purpose, I propose, is: to improve the safety of the Little Falls Parkway, including the roadway, non-vehicle pathways, and connections to it between Dorset Avenue and Fairfax Road.

The need is: based on reports of safety-related problems, including at the Capital Crescent Trail crossing (as currently configured), at intersections as well as in other

areas that are foreseen, improvements that do not have undesirable consequences to the road and non-vehicle pathways, are needed.

As to need, the significant safety problem on the Little Falls Parkway, which was at the Capital Crescent Trail crossing, was rectified by a road diet that had one northbound lane, one southbound lane, a 17-foot-wide refuge in the grass median area between the northbound lane and southbound lanes (installed in 2017), speed reductions at the crossing, and a raised crosswalk (installed in 2020). Those are sound changes, along with the overall Parkway speed limit reduction to 25 mph.

A significant group of nearby residents recognize both that Montgomery Parks purports to rely on Vision Zero and safety, and that this is a pretext for Parks' post-2017 reconfiguration of the Little Falls Parkway. It started with the proposed linear park, which did not wash.

Montgomery Parks broadly invoked generalized concerns over speeding, but did not, arguably because it could not, tie them to a data-based safety problem reflected in crashes on the Parkway over numerous years following the implementation of road diet at the Trail crossing, or demonstrate an action-based concern about speeding through campaigns involving speed management activities that would reflect that it was worthy of priority treatment as a real problem. The sparse reference in the draft statement of need shown on March 12 and noted above to vague and unspecified policy objectives adopted by the Montgomery County Council and the Commission, does not satisfy the federal Administrative Procedure Act.

Parks failed to assess, based on data, whether there were problems much less acknowledge the absence of a significant crash history problem on the Little Falls Parkway from north of Dorset Avenue to south of Hillandale Road following changes in 2017, up to the 2022 modifications, and a speed limit reduction. (This will be addressed further below.)

Parks' inaction on speed limit compliance after it installed the road diet in 2017 reflects the absence of a perceived safety problem. For years, Parks did not address speeding above the posted limit and did not implement established speed management techniques such as use of traffic control to maintain desired speeds, and the use of enforcement, signs, and technology to increase compliance with speed limits and to provide feedback to drivers about desirable operating speeds. Instead, in 2022 Parks invoked claims of safety to leap to its goal of removing



travel lanes from the Little Falls Parkway, a far more disruptive response to newfound speeding concerns.

As discussed below, Montgomery Parks' October 2022 reconfiguration of the Little Falls Parkway, making it a two-lane road without a median between the lanes, and eliminating the 17-foot-wide median refuge island at the Capital Crescent Trail crossing between the northbound and southbound lanes of the Parkway made it unsafe. Speeding problems should be addressed by available mechanisms such as speed cameras, speed bumps, similar to those on the Little Falls Parkway between River and Massachusetts Ave, and fair and equitable enforcement.

### **RESOURCES LIKELY TO BE IMPACTED BY** **THE PROPOSED ACTION**

These include:

- Safety/Traffic Safety
  - Bicyclist and pedestrian safety
  - Motor vehicle safety
- Recreation (including associated safety)
  - Bethesda County pool, vehicular traffic into and from the parking lot, and safety of users including pedestrians, bicyclists and children
  - Capital Crescent Trail, a recreational resource
  - Little Falls Stream Valley Park 2 parking lot connection to Capital Crescent Trail
  - Proposed (by Montgomery Parks) protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and buffered bike lane from Capital Crescent Trail to Dorset Avenue
  - Little Falls Trail

## **POTENTIAL IMPACTS THAT ARE LIKELY TO RESULT FROM THE PROPOSED ACTION**

### **TRAFFIC SAFETY, INCLUDING PEDESTRIANS AND BICYCLISTS**

The Environmental Assessment (EA) should address traffic safety concerns, and in so doing, include both a full rendering of data and a description of credible experiences that, although having not resulted in crashes, demonstrate dangerous conditions.

M-NCPPC's Planning Department and County employees have data bases of crashes in Montgomery County. A group of data bases includes crash reporting, crash reporting- drivers data and crash reporting-non motorist data. See [https://data.montgomerycountymd.gov/Public-Safety/Crash-Reporting-Incidents-Data/bhju-22kf/about\\_data](https://data.montgomerycountymd.gov/Public-Safety/Crash-Reporting-Incidents-Data/bhju-22kf/about_data). One of these is a huge spreadsheet in which one clicks on actions, then query data into which road names can be entered, but this is difficult to use with an assurance of completeness and accuracy, if not one is practiced in using it.

Another data base is the Planning Department's interactive crash map that covers 5 years, to 2022. As stated in the interactive crash map website, to achieve the ambitious goal of vision zero, we must understand our crash history and the conditions that lead to crashes on our highways. [Montgomery County Interactive Crash Map \(2015-2020\) \(arcgis.com\)](#). The interactive map allows the isolation of crashes by severity and by what was involved (vehicle to vehicle; bicycle; pedestrian). Data presented below, which are indicative of crash history, are derived from the Planning Department interactive map, which does not include the last year's data, and warrant updating by the applicant for the Little Falls Parkway project using the larger data bases.

In addition to data, local residents have offered numerous important observations of significant problems that they have seen. Some of these were presented to the Planning Board. Others, captured in videos, have been presented to Montgomery Parks' staff. Still others were discussed at the public meeting on March 19, 2024 at Somerset School, which included by Parks' staff.

Safety of users— pedestrians, joggers and bicyclists - of the Capital Crescent Trail as it crosses the Little Falls Parkway.

The EA should discuss the current and anticipated use of the heavily used Capital Crescent Trail at and near the Little Falls Parkway, the potential impacts of the alternative(s), and proposed measures, if any, to avoid or reduce adverse impacts to the Trail's users. The safety of Trail users has been and remains a key concern. The EA should present and discuss data on crashes, a death and injuries, and previous assessments by Montgomery Parks. The EA should address the human factors problems with the current absence of a safety refuge island in the Capital Crescent Trail between the northbound lane and southbound lane of the Little Falls Parkway. And, given the numbers of Trail users, it should discuss the need for a substantial refuge island.

As to fatal crashes, the crash history based on the Planning Department's interactive crash map, reveals one fatal crash in the Capital Crescent Trail crossing of the Little Falls Parkway: Ned Gaylin in 2016. That occurred before the road diet, which I support, was constructed. There have been no severe crashes. In the interactive map, under isolate pedestrian crashes, there was one on the Parkway at the Capital Crescent Trail crossing (12/1/2022).

In October 2022, when switching *from* its Phase I Parkway alignment, which had retained the refuge island for the safety of walkers, joggers and bicyclists on the Trail in the median between the northbound and southbound lane of the Parkway, to Phase 2, Parks eliminated the refuge island. From a safety standpoint, this was highly problematic.

A pedestrian refuge island (or crossing area) is a median with a refuge area that is intended to help protect pedestrians who are crossing a road. FHWA, "Medians and Pedestrian Refuge Islands in Urban and Suburban Areas," FHWA-SA-21-044, [Medians and Pedestrian Refuge Islands in Urban and Suburban Areas | FHWA \(dot.gov\)](#). A pedestrian refuge island can improve safety and comfort by providing pedestrians with the option of waiting in the median area before beginning the next stage of the crossing. Pedestrian refuge islands can reduce pedestrian crashes by 32%. FHWA, "Pedestrian Island," [Pedestrian Refuge Island Safe Transportation for Every Pedestrian Countermeasure Tech Sheet \(dot.gov\)](#); see FHWA, "Step: Improving Visibility at Trail Crossings" page 8 "After" image, [STEP: Improving Visibility at Trail Crossings \(dot.gov\)](#), Report Number FHWA-SA-21-123 (2021)

Seemingly, the alternatives before NCPC would restore the refuge island. In view of the usage of the Trail, the full 17-foot-wide refuge in the grass median area between the northbound lane and southbound lanes needs to be restored, and the

raised crosswalk installed in 2020 needs to be retained, as does the road diet at the Trail crossing.

Area resident Carl Becker has presented materials to NCPC that warrant serious consideration.

#### Safety of intersection of Little Falls Parkway and Arlington Road.

The EA should discuss the safety of the intersection of Little Falls Parkway and Arlington Road, under at least several scenarios. These include the most recent NCPC-approved four-lane Parkway configuration, changes made to-date since then, the proposal before the NCPC and some right turn lane options, including different depths for a right-hand turn lane from the Parkway onto Arlington Road.

The EA should discuss crash data and previous assessments by Montgomery Parks. In this regard, as to severe crashes, the interactive map reveals one severe crash of vehicles with a suspected or actual severe injury at the Arlington Road and Little Falls Parkway intersection (August 17, 2022).

It bears noting that most of the crashes on the 0.4-mile segment of Little Falls Parkway under consideration have been at intersections, primarily at Arlington Road and the Little Falls Parkway. As to this intersection, using the interactive crash map, under isolate pedestrian crashes: on the Parkway there were several that were not severe (one north of Arlington, 8/13/18, and two at Arlington, 12/10/18, 8/12/19). Under isolate bicycle crashes, there were five (5) that were not severe at the Arlington Road intersection, 10/20/15, 5/8/16, 8/10/16, 11/7/16, 2/19/18. There was one just south of Arlington Road and north of the Trail crossing (9/8/16). Under isolate crashes involving only vehicles, apart from the 8/17/22 severe crash noted above, there were ten (10) non-severe crashes at or near the intersection of the Parkway and Arlington Road (1/10/15, 1/24/15, 6/20/25, 10/6/15, 10/29/26, 11/30/15, 1/8/16, 3/25/17, 6/30/22, 8/17/22). To put it in perspective, the data bases show hundreds of thousands of crashes in the County and thirty on the Little Falls Parkway from Massachusetts Avenue north to the Parkway's terminus.

#### Safety of segment of Little Falls Parkway between Hillandale Road and Dorset Avenue

The EA should discuss the safety of the Little Falls Parkway between Hillandale Road and Dorset Avenue.



Based on the Planning Department's interactive crash map, as to severe crashes, there was one non-intersection crash involving a bicyclist south/southbound of Hillandale on Little Falls Parkway (July 14, 2019). In addition, under isolate bicycle crashes, on the Parkway there was one south of Hillandale, 4/16/16; under isolate crashes involving only vehicles, one south of Hillandale (1/18/20).

A characteristic of the Parkway between Dorset Avenue and Hillandale Road that warrants consideration is that it was in essence a no access divided highway. These tend to be relatively safe on a VMT basis. There have been few (none fatal) crashes, as reflected in the data above. In fact, Parks own analysis of crash data in its Memorandum report to the Montgomery County Council dated November 1, 2023 contained, under "Vision Zero: Reducing the Parkway to Two Lanes is Safer" only Figure 8: Crashes Between Arlington and Hillandale 2015 (p.12) and Figure 9: Crashes at Capital Crescent Trail Crossing Since 2015 (p. 13) but no figure on the segment of the Parkway between Dorset Avenue and Hillandale Road because, I submit, the data showed a low incidence of crashes. It also should be noted that there are no speed bumps and so far as I have noticed, a speed camera has not been installed.

The temporary Parkway crossover the median north of Dorset Avenue, which is slated for removal as part of the proposed project, presents safety issues. It is unwieldy and at night is more dangerous, as the Parkway lacks lights.

#### Safety of intersection of Little Falls Parkway and Dorset Avenue and the area of the Parkway north of that intersection.

The EA should discuss the safety of intersection of Little Falls Parkway and Dorset Avenue, under at least several scenarios. These include the most recent NCPC-approved Parkway configuration, changes made to-date since then, the two-lane County Council proposal before the NCPC, the safety problems encountered by northbound vehicles on the Parkway turning left into Dorset Avenue (toward Kenwood), the safety problems encountered by southbound vehicles on the Parkway turning left into Dorset Avenue (toward Somerset), and the safety problems encountered by westbound vehicles on Dorset Avenue turning right onto the Parkway (to go north toward the Bethesda pool).

As noted above, most of the crashes on the 0.4-mile segment of the Little Falls Parkway have at intersections, with the second most occurring at or near the intersection of Little Falls Parkway and Dorset Avenue. Based on the Planning Department's interactive crash map, under isolate bicycle crashes, there were two at the intersection of the Parkway and Dorset (1/24/20 and 2/24/21). Under isolate

crashes involving only vehicles, there were seven (7) at or near the intersection of the Parkway and Dorset (2/15/15, 12/9/15, 12/15/15, 12/23/16, 8/21/17, 10/26/17, 3/26/18).

If the intersection of Little Falls Parkway and Dorset Avenue were the intersection of two country roads that experience light traffic, it likely would be fine. It is anything but that. In the area of the intersection, there are Parks' lane reductions of the Parkway from four lanes to two, left hand turns off of the Parkway by some vehicles going in a northerly and some in a southerly direction, right hand turns off of the Parkway onto relatively narrow Dorset Avenue (without a north-side sidewalk), right hand turns from Dorset going north onto the Parkway, and traffic backups on the Parkway at the traffic light. It can fairly be said that this intersection is an unmitigated problem that may aptly be described as an *accident waiting to happen*. At a March 19, 2024 public meeting on the Parkway at Somerset Elementary School, which was recorded by Montgomery Parks' trail planner Kyle Lukacs (whose participation along with Andrew Tsai, I appreciated), local residents described dangerous situations in making left hand turns from the Parkway's northbound and southbound lanes onto Dorset Avenue, with the absence of turning lanes. One resident described another problem -- in making a right hand turn from Dorset Avenue going north onto the Parkway. This situation requires consideration of various physical lane configurations and not simply traffic signals, as there is the problem of traffic backups. There are additional problems -- with the proposed bike lane at Dorset -- which are described below.

## SAFETY TO RECREATIONAL USERS IN AND ADJOINING THE AREAS IMPACTED BY THE PROPOSED PROJECT

### Safety of Bethesda Pool Traffic and Parking Lot

The EA should discuss traffic safety at the Bethesda pool. The EA should at a minimum discuss the alternatives of two-way traffic into/from the pool parking lot from/to the Parkway, one way traffic into the parking lot from the Parkway, one way traffic from the parking lot onto the Parkway, and the impacts of proposed changes to the Parkway entrance/exit on traffic onto and on Hillandale Road, including turns into the pool parking lot from Hillandale Road.

Montgomery Parks' proposal would modify the ingress/egress from/to the Little Falls Parkway to the Bethesda pool parking lot, which is relatively small and far from ideally configured. The proposal would impact not only that area but it

would also have an indirect impact on the traffic flow into the pool lot, including from Hillandale Road. The pool is heavily used in the summer, particularly on weekends. In the summer, there are swim meets on Wednesday nights that run past dark. <https://www.bebarracudas.org/types-of-meets>. In the parking lot, there are children dashing out on foot and on bicycles. Parking lots are anything but inherently safe. In Montgomery County, 22% of the pedestrian-related collisions occur in parking lots. [https://www.montgomerycountymd.gov/DOT-PedSafety/Resource/Parking\\_Lot\\_Safety.html](https://www.montgomerycountymd.gov/DOT-PedSafety/Resource/Parking_Lot_Safety.html). The pool parking lot is used year-round by motorists who park there and then go by foot or bicycle onto the Capital Crescent Trail.

The interactive data base shows one crash at the Bethesda pool (7/16/17).

#### Safety of Connection of Little Falls Stream Valley Park Parking Lot to the Capital Crescent Trail

The EA should discuss pedestrian safety in travelling *from* Montgomery Parks' parking lot on the Parkway, north of Arlington Road *to* the Capital Crescent Trail. Montgomery Parks' parking lot appears at the far left, lower part of the page in the drawing Appendix A Little Falls Parkway - Arlington Road to Dorset Avenue (Updated based on 11/27/23 PHP Committee Meeting), which is after page 14 of the Project Plan, as linked on the NCPC website.

The Project Plan drawing shows (in green) pavement removal along the Parkway between that parking lot and the Parkway, both between an entrance to the parking lot and Arlington Road, and north of that entrance to the parking lot, as well as a pathway on the east side of the Parkway from Arlington Road to the Capital Crescent Trail. This pathway (in blue) is not labeled on the drawing.

This parking lot on the Parkway is widely used in the summer by people going to the Bethesda pool including on Wednesday night swim meets. It is used year year-round by motorists who park and then go by foot or bicycle onto the Capital Crescent Trail. And it is used, particularly in the spring and fall, by parents of children practicing soccer in the field to the east and uphill of the lot.

<https://msisoccer.org/fields-of-play>;

<https://rainoutline.com/search/extension/3015795610/78>.

The EA should evaluate the infrastructure connections from the parking lot to the Trail for safety purposes and consider alternatives. Will there be a sidewalk; what are the alternatives on where it will be located in relationship to the road? Will the pathway should be separated from the road by a vegetative buffer and what will the

pathway should be made of? Our county has a Pedestrian Master Plan, prepared by M-NCPPC's Planning Department and approved with revisions by the County Council, which should be consulted. The sidewalk and pathway should score as highly comfortable to users under that Plan.

Safety of the protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and of the buffered bike lane from Capital Crescent Trail to Dorset Ave in former right, southbound lane of Little Falls Parkway

The EA should evaluate the safety and utility of both the proposed protected shared use path connection from north of Arlington Road to the Capital Crescent Trail and the buffered bike lane from Capital Crescent Trail to Dorset Ave in former right, southbound lane of Little Falls Parkway. It should consider alternative safety mechanisms to and within the proposed six-foot-wide buffer zone of the Buffered Bike Lane along the road length from the Capital Crescent Trail to Dorset Avenue. In addition, the EA should evaluate the safety of right turns from the buffered bike lane at its southern terminus, eastward onto Dorset Avenue.

Montgomery Parks' proposal would repurpose the right southbound lane of the Parkway for use by bicyclists and, north of Arlington Road, also for use by pedestrians. The Project Plan Drawing shows from the north to the Capital Crescent Trail, a "PROTECTED SHARED USE PATH CONNECTION TO CAPITAL CRESCENT TRAIL." That is separated from the roadway by a four-foot buffer; in the buffer would be structural "Trail Barrier Separation." The drawing also shows a "BUFFERED BIKE LANE FROM CAPITAL CRESCENT TRAIL TO DORSET AVE." For purported safety, the bike lane would be separated from the road by a 6-foot-wide buffer; in the buffer would be "LOW PROFILE IMPROVEMENTS LANE SEPARATORS." Parks' proposed typical section (after the drawing in the project Plan) has a somewhat different description – a "LOW PROFILE LANE SEPARATOR AND/OR REFLECTORS."

There is a bit of history related to the Buffered Bike Lane, which in the pending plan involves use of the former and to be repurposed, outer southbound lane by the Fire and Rescue service. Their vehicles could readily move over a low curb in the 6-foot-wide buffer, which I propose be considered. But apparently due to bureaucratic rigidity relating to an ideal world that Fire and Rescue commonly operates outside of, they do not want to do so on the Parkway which in the segment at issue historically has had very few crashes that might require a fire/rescue vehicle to pull over. Secondly, as to the proposed, low profile lane separators and/or reflectors, reflectors should be rejected as inadequate and a combination of



low-profile lane separators and rumble strips (also known as sleeper lines or alert strips) should be considered.

In as much as the buffered bike lane is proposed, rather than existing, there is not a crash history on the proposed lane.

Some would like connectivity from the southern terminus of the Buffered Bike Lane via Dorset Avenue to the Capital Crescent Trail. That may occur on paper. But the reality, as discussed at the public meeting at Somerset School on March 19, 2024, is that a right hand turn from the proposed Buffered Bike Lane to Dorset Avenue will experience significant problems that need to be considered. Dorset Avenue to the west of the Parkway is quite narrow. There is no sidewalk on the northern side of Dorset Avenue. On the southern side there is a narrow (less than 4 feet) sidewalk. Southbound vehicles on the Parkway make quick right hand turns onto Dorset Avenue. Safety enhancements need to be addressed.

As to the need for and likely use of the Buffered Bike Lane, recent data are not supportive.

A count earlier this year, after pandemic era pedestrian and bicyclist use of the Parkway had cratered, and under conditions when both former southbound lanes of the Parkway were unavailable to motor vehicle traffic (under the Phase II configuration, all traffic was on the former northbound lanes), revealed very low usage of the former and now closed southbound lanes of the Parkway by pedestrians and bicyclists:

Little Falls Parkway users other than motor vehicles  
 Counts of walkers/joggers/runners/cyclists on the Little Falls Parkway on 1/10/2024.  
 Location of counts/people counted: counts were of people on the Parkway crossing in front of the Bethesda pool. Human counters sat in their motor vehicles, in the Bethesda Pool parking lot, facing the Little Fall Parkway. If a counter noticed that an individual crossed in front of the counter more than once, that person was counted as one user.

Time period	Number of walkers/joggers/runners	Number of cyclists
7:52 am to 9 am	3	2
9 am to 10 am	3	1
10 am to 11 am	2	
11 am to noon	2	
Noon to 1 pm	1	1
1 pm to 2 pm	2	
2 pm to 3 pm	3	
3 pm to 4 pm	4	1
4:00 to 4:30 pm	5	
TOTAL	25	5

This is entirely understandable. These now closed lanes of the Parkway are a form of road to nowhere, sometimes terminating at an undesirable westerly ride on Dorset Avenue and on that to the Capital Crescent Trail.

Apart from how this reflects on “Need,” it reveals that pedestrians would likely walk in the Buffered Bike Lane, but numbers of potentially impacted people would not be high.

#### Safety related to Little Falls Trail

The EA should evaluate the safety of the Little Falls Trail at the intersection of Little Falls Parkway and Dorset Avenue and at Hillandale Road. Connectivity to the pool is important and less than ideal.

Respectfully submitted,

*Lloyd Guerci*

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OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich  
County Executive

**Comment Noted**

M E M O R A N D U M

March 28, 2024

TO: National Capital Planning Commission  
Michael Weil  
NCPC Project Review

FROM: Marc Elrich  
County Executive 

SUBJECT: Environmental Assessment of Little Falls Parkway Project

Thank you for the opportunity to submit comments for the Environmental Assessment of the proposed changes to Little Falls Parkway. As you know, changes to the Parkway at the Capital Crescent Trail crossing began in response to the terrible accident that took the life of a bicyclist in January 2017. Since that time, the Montgomery County Parks Department has introduced numerous “interim” iterations of road diets. As various changes have been made, the proposal has morphed into a patchwork of “solutions” that do not adequately address the stated purpose of reducing potential collisions between vehicles and vulnerable pedestrians and bicyclists who cross the CCT at Little Falls Parkway. To the contrary, residents of the area have raised credible concerns that the proposed changes, which extend beyond the actual trail crossing and affect two major intersections, have the potential to compromise safety not only along the Parkway but also on neighboring streets.

It is my understanding that NCPC’s Environmental Assessment will consider only two alternatives: (1) “no action,” which would return the Parkway to the original 4-lane configuration; or (2) “action,” which would accept the Parks Department’s current proposal to install its recommended improvements along Little Falls Parkway between Arlington Road and Dorset Avenue. It is unfortunate that those are the only two choices – a far better alternative would be to return the proposal to the Parks Department for further consideration of the legitimate questions that have been raised about the potential impacts of proposed changes on the safety of everyone who uses the Parkway or lives near it. However, faced with a choice between



the two alternatives, I support “no action.” While I strongly support additional safety improvements, I do not agree with the current Parks Department proposed “solutions.”

Specifically, I would like to address traffic and operations issues, which I understand will be one of the elements considered in the Environmental Assessment. At your scoping meeting on March 12, 2024, a Parks Department staff person justified the request for permanent closure of one lane in each direction by stating that the Parkway “is not primarily for vehicle conveyance.” Staff did not explain the basis for this determination, and I disagree with that characterization. Little Falls differs from Sligo Creek Parkway and Rock Creek Parkway – two-lane roads that were designed for rides through parkland. In contrast, when the Parks Department was given authority by the State to manage Little Falls Parkway, it was a four-lane road that was, and remains, the major non-neighborhood road connecting River Road to Bethesda. It was important then, and more important now, given the major development occurring in Westbard and Bethesda. Reducing vehicular traffic to one lane in each direction will result in vehicles opting to turn onto neighborhood streets to avoid queueing on the Parkway.

As for the current plan, Parks Department staff did not discuss their proposed changes with the County’s Department of Transportation (MCDOT). They often refer to their collaboration with and “significant support” from DOT. When asked if they had provided significant support, DOT staff replied, “In a word, no.” Because the Parkway is under the jurisdiction of Parks, the extent of DOT’s involvement has been to relocate the traffic signal heads and displays at Arlington Road to accommodate the initial modification of the Parkway. As of this date, the Parks Department has not discussed the additional changes with DOT, even though there are potential impacts on county roads from the proposed changes at the Arlington Road and Dorset Avenue intersections and at the ingress/egress at the Department of Recreation Pool located at the intersection of the Parkway and Hillandale Avenue.

The County’s Executive department staffs are available to answer questions during NCPC’s Environmental Assessment review. I hope you will take advantage of their expertise. And I urge you to consider the comments of residents of the area who have raised concerns about the impacts these changes will have on the affected intersections and on the roads adjacent to the Parkway. There are ways other than a permanent road diet to address safety issues at the CCT crossing without creating safety concerns in the surrounding area. It is not too late to consider other options.

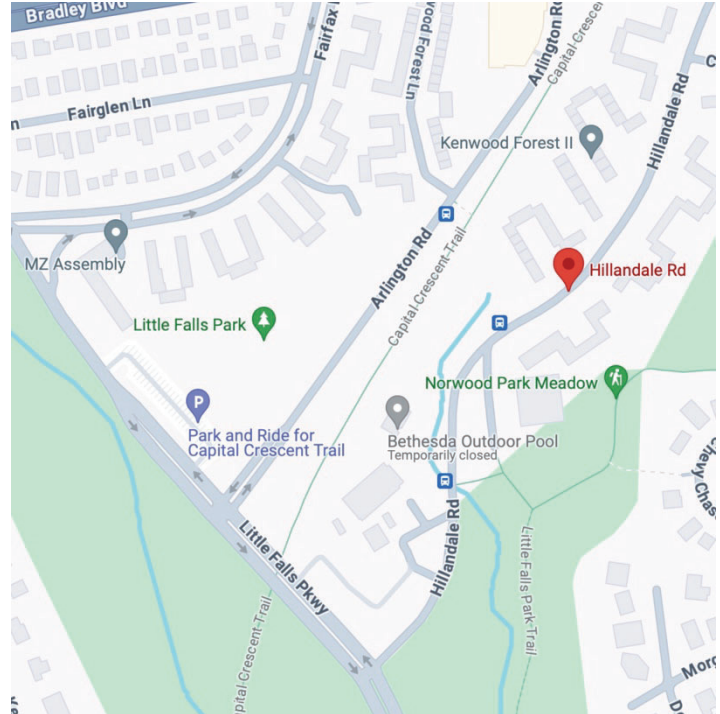
Comments are wide ranging and  
addressed throughout the draft EA

Thank you for providing this opportunity to comment on the proposal for Little Falls Parkway (LFP). This proposal raises multiple concerns, as changes to the Parkway have impacts, including environmental and safety impacts, well beyond the road itself. **This proposal is not ready for consideration as it has multiple gaps.**

In 2021, without any prior public input, Parks presented a plan for a reduced roadway (from two lanes in each direction to one) and a linear park in the abandoned LFP lanes. Since then, the linear park has been dropped and the unused lanes redesigned for emergency access and, on the southbound side, a bicycle lane. All of the changes made, whether by Parks on its own initiative or required by the Montgomery County Council, have been *adjustments* to the original proposal rather than a comprehensive redesign. In short, the Parkway changes have never been planned holistically, considering ripple effects and what changes in the parkway would mean within park boundaries and on land that falls under County jurisdiction.

## **Environment**

1. Environmentally, the current design will result in extensive backups on LFP at the three intersections involved (Arlington Road, Hillandale Road, and Dorset Avenue) and at the Capital Crescent Trail (CCT) crossing, with at least no reduction in air pollution and the potential for increased air pollution as cars idle. Parks has not modeled this.
2. The current design will push a great deal of traffic onto Hillandale Road, as a result of backups on LFP northbound at Arlington Road. After a few hundred feet of greenery, the County section of Hillandale has more than 700 townhouses on both sides. There are many families with young children, and a school-bus stop. The traffic diversion, leading to greatly increased cut-through traffic on the County road, will increase exposure to air and noise pollution for Kenwood Forest and Kenwood Forest II.



[https://www.washingtonpost.com/realestate/kenwood-forest-in-chevy-chase-offers-a-wealth-of-activities-for-townhouse-residents/2013/09/05/b81c9e96-14e3-11e3-a100-66fa8fd9a50c\\_story.html](https://www.washingtonpost.com/realestate/kenwood-forest-in-chevy-chase-offers-a-wealth-of-activities-for-townhouse-residents/2013/09/05/b81c9e96-14e3-11e3-a100-66fa8fd9a50c_story.html) focuses on how child-centered Kenwood

Forest is. Multiple studies have shown the deleterious effects of air pollution on children's health in particular.

3. See as well item 3 under traffic, regarding increased traffic in the vicinity of the Bethesda pool. Any increase in traffic and idling exposes pool users to more air pollution.

### **Traffic**

1. Parks has stated earlier that this design has multiple Vision Zero attributes, although Vision Zero wasn't mentioned at the scoping session. Increased traffic on Hillandale will degrade safety. There is no traffic signal on Hillandale between LFP and Bradley Boulevard although there are currently two crosswalks. There is also a bus stop for elementary school students from the communities on both sides of the road on Hillandale. People walking dogs, children on bicycles, and pedestrians generally are common on Hillandale.
2. Safety concerns become even more intense during the months when the Bethesda Pool, under the County's Department of Recreation and located just northeast of the LFP/Hillandale intersection, is in operation. The pool parking lot fills up quickly, especially on weekends; at times in 2023 vehicles were parking in the westbound lane of Hillandale, reducing the road to a single lane, with no one directing traffic. This section of the road is within Parks' jurisdiction yet Parks has said only that they know about it, not what if anything they plan to do about it.

Parks proposes to restrict pool access at LFP, just south of the CCT, to emergency/service vehicles only, and direct all public vehicular ingress and egress to the Hillandale access. This will make a mess of traffic on Hillandale in both directions. Hillandale has one lane in each direction; the westbound lane dead-ends at LFP and requires vehicles to turn right (north) or left (south) onto LFP. There are already frequent backups on Hillandale because of backups on LFP that prevent these turns. As well, cars will be turning both left and right into and out of the pool parking lot. This is a recipe for collisions (as well as added air pollution from idling cars within a short distance of those using the pool).

Parks says these changes are to reduce vehicle/pedestrian conflict in the parking lot. The result, however, will be to increase vehicle/vehicle conflict on Hillandale, and vehicle/pedestrian conflict at the raised, unsignaled crossing on Hillandale to the Little Falls Trail.

3. Traffic issues abound at the other affected intersections, LFP/Arlington Road and LFP/Dorset Avenue. Park's design has created intense tension between through traffic on LFP and turning traffic from and onto LFP at both intersections. There is a significant risk of collision between cyclists and cars at the Dorset end of the bike path, where drivers may not see cyclists. Parks was noncommittal regarding

a signal specifically for cyclists there; NCPC must require a proactive solution from Parks here.

## **Safety**

1. Pedestrians are given short shrift in this plan.

The most egregious example is that while Parks proposes extending the paved shared path that begins at Bradley and extending it south to the CCT for pedestrians and bicyclists, the continuation of this path in the abandoned lane from the CCT to Dorset would be only for cyclists. Parks staff have noted they have no way to keep pedestrians off the path there, and also that there is no fencing planned as would be required for pedestrian access. It is questionable whether signs stating pedestrians are prohibited from using the bike lanes would be effective. In addition, the remaining space in that lane is meant for emergency access, so any pedestrians in area between the path and the road would be at risk should emergency vehicles require its use.

Parks has failed to address pedestrian access and safety between its parking lot on the north side of Arlington Road (suggesting that vehicle/pedestrian conflict is not a concern here – unlike at the Bethesda Pool - despite the fact that this lot serves CCT users, pool visitors, and visitors to the LF Stream Valley Park playground and soccer field, which is reachable by a jury-rigged dirt path). Nor is there connectivity with sidewalks at the low-income garden apartments directly north of the parking lot, or the “crosswalks to nowhere” (cycle and pedestrian) between the northbound and southbound sides of LFP at the split for Fairfax Road.

One idea proposed by a Parks staffer at a community meeting on March 19, 2024 was to install a sidewalk on the south side of Hillandale to LFP, enabling a signaled pedestrian/cyclist crossing of Hillandale. This is one step to improving safety but pedestrian safety must be addressed by completely.

2. Parks has not resolved the “bicycle path” to nowhere at LFP and Dorset. LFP is about 400’ from the CCT. Dorset is a County road. There is no room in the street for a bike path, and the sidewalk on the south side of Dorset is only 44’ wide, barely enough for two people to pass if they’re relatively skinny. Encouraging cyclists to use Dorset to get to the CCT is not safe for anyone – cyclist, driver, or pedestrian.



3. The road diet put into effect in 2017, following the death of a bicyclist at the CCT crossing, was very effective in reducing crashes, from a maximum of 8 in 2016 steadily declining to zero in 2021. There is no evidence that the Phase 2 changes – the current configuration, begun in mid-2022 – have added significantly to safety there. This chart was part of Parks

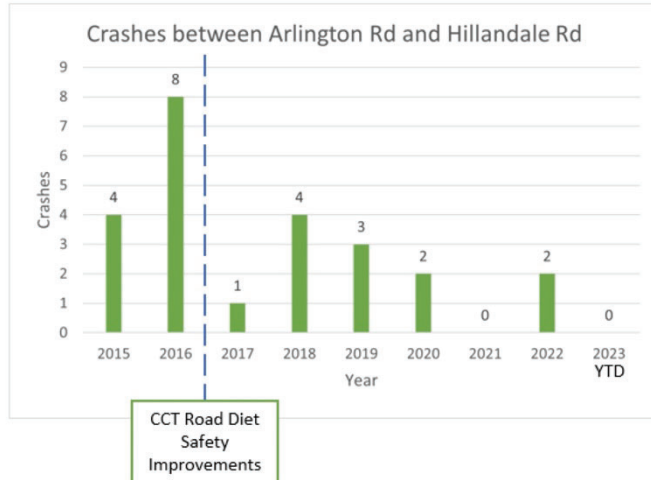


Figure 8: Crashes Between Arlington and Hillandale 2015

submission to the County Council on November 1, 2023. Parks plans to restore the median here – a good move – but this does not entirely remove the potential for conflict between bicyclists/pedestrians/cars. This is an opportunity to review other ways to improve safety, including perhaps by reconsidering rerouting the CCT to the traffic signal at LFP and Arlington.

4. Parks cites speeding and unsafe driving as reasons for reducing road capacity on LFP by 50% between Hillandale and Dorset from two lanes in each direction to one. Parks has not provided crash data for LFP between Hillandale and Dorset. Parks has lowered the speed limit there but has not regularly or consistently enforced it. Parks has not used passive measures, such as speed humps or cameras, to reduce speeds (speed humps were installed on LFP between River Road and Massachusetts Avenue).

## **Measurements and Projections**

1. Parks admitted at the NCPC Scoping Session Zoom on March 12 that it had taken no measurements of pedestrian/cyclist usage on the southbound abandoned lane in Phase 2, yet they have persisted in claiming thousands of users per year. It is unclear that there is compelling demand for a bicycle path here. A one-day count found a total of 30 users of the path (25 pedestrians, 5 bicyclists). The counter Parks installed at the northern end of the CCT, in downtown Bethesda, regularly shows pedestrians outnumbering cyclists at least 3 to 1; on a recent spring-like day it was 714 pedestrians to 147 cyclists at 3pm closer to a 5 to 1 ratio.
2. Finally, Parks says it has projected vehicle use on LFP out to 2040. There are two primary master plans that are part of such projections, Westbard and Bethesda Downtown. Parks has very little property within these plan areas, and the County is responsible for virtually everything. This year, Planning is initiating analysis and study of increasing or removing the density cap in downtown

Bethesda, with a minor master plan amendment to be proposed by the end of the year. What the increase in density will be is unknown; I doubt Parks has taken this upcoming increase in density – and car use - into account in its projections.

In addition, the Planning Board is developing a countywide “attainable housing strategies” initiative that would apply to all of the communities that depend on LFP for access to downtown Bethesda and/or Westbard. Currently proposals include allowing to small apartment buildings as well as other multiplex residential housing in all areas zoned R-60 and R-90, which now allow only single-family housing and are the primary zones in this part of the County. It is unlikely that Parks has factored potential growth from new housing strategies into its projections of LFP use.

Over the past three years, many people at the Council and in the broad community have wrestled with Parks’ LFP proposal. The Council came up with a compromise but while it resolves some issues there are many others remaining from the Phase 2 configuration and Parks’ interpretation of the Council’s resolution. It appears that the sole benefit of the proposed changes would be a 0.4-mile bike path for a very limited number of users, while pollution and safety risks to everyone increase.

NCPC must have Parks refine this proposal to address the risks and issues that in its current form it would create. If Parks cannot do that, the proposal should be rejected.

Thank you for your consideration.

Sincerely,  
Naomi Spinrad

To: NCPC Staff

Comment Noted

Re: Little Falls Parkway Improvement Project

I am a resident of the Kenwood neighborhood and a member of the Kenwood Citizens Association and the Citizens Coordinating Committee on Friendship Heights. I am sending in comments as a resident of a neighborhood that has been impacted by the multiple changes to Little Falls Parkway from April 2020 until the present.

The Parkway initially changed at the CCT Crossing because of a fatal accident in Oct of 2016. The road was narrowed to two lanes at the crossing only and the safety statistics supported the change. Citizens were asked what was favored at that crossing and the majority asked for a bridge with the 2nd popular solution to cross everyone (pedestrians and bicyclists) at the light at Arlington Road. In June of 2019, the Planning Board voted 4 to 1 to cross all pedestrians and bicyclists at the light in the name of Vision Zero. In September of 2019, that legitimate vote was overturned in a closed session and tabled for 6 years "because of cost". A few months later it was dropped from the budget. In April 2020, the Parkway was closed to all traffic 24/7 for the Open Parkways Program. The closure caused extreme cut through traffic in older neighborhoods with narrow streets and no sidewalks. In October of 2021, Parks opened the Parkway during the week and kept it closed on weekends. I photographed that Parkway for 9 months (Oct-June); just to note- no one was using it (Parks states that they had 540 users per day, but that statistic was not validated and was never observed by those who live near). Then on June 18, 2022, the Parks department started Phase 1 to retain the road diet at the CCT and close one lane in each direction while retaining the wide grass median for that length of roadway (between Arlington Road and Dorset Avenue). Then in Oct of 2022 Parks announced a plan to create a linear park to add "needed recreational space" where none was needed or asked for. Parks moved the N/S lanes to the east side with no median. **This configuration which remains today is totally unsafe, much less safe than the original plan with two lanes on either side and the wide existing median between.** There was a large outcry from the public that used the Parkway for either a beautiful drive to Bethesda to do business and work, or to the public pool, or to the soccer fields or to the parking lots to unload their bikes and use the CCT. **The aesthetics of the Parkway have been terribly damaged with jersey walls, bollards, stripes, chicanes, broken signs, old gates left unused, and flex sticks.** All done in the name of a linear park, and vision zero.

There was a public hearing on LFP on March 30th at the Planning Board. 71% of the people testifying testified against the road diet. Over 5775 citizens signed a

petition to open the parkway up to four lanes and make it safe again. The Planning Board voted 4-1 in favor of Parks' plan for a linear park and two opposing lanes pushed to the east side. On May 8, the County Council after hearing from many citizens about the neighborhood opposition, did not fund the linear park and said that any realignment had to be approved by the CC. After a meeting on Nov 27th with the PHP Committee, there were two options to be brought before the CC. Option #1 was Parks proposal for two opposing lanes on the east side and the pavement removed. Option #2 was the PHP recommendation that the Parkway be two lanes (n/s) on either side the existing wide median and the pavement retained in lieu of more studies as the coming development realizes actual density (Bethesda- 33,000,000 square feet with 7M more in discussion. Westbard- 1,800,000 square feet in process- River Road named as a growth corridor). There are no plans for public transportation expansion in these areas. On January 23rd, the County Council voted in favor of Option #2. **At that time Council President Friedson made a pointed strong suggestion to the Director of Parks and all Parks personnel involved, to do an operational change back to one lane N and one lane S on either side of the wide median from the CCT to Dorset Ave in the interest of safety and goodwill for the surrounding neighborhoods.** We ask that this be done now (bring the Parkway back to where it was in June 2022) while Parks is working on plans in application to NCPC.

All of this was first done because of a linear park, then when the linear park was rejected because of public disapproval, the new reason is Vision Zero. The way the Parkway is now has so many danger points that any compliance with Vision Zero is nonexistent.

To note: this stretch of constantly changing parkway is 0.4 of a mile. It is exactly 2112 feet. So many taxpayer dollars have been spent on this project with at least another \$600,000 in the pipeline which will balloon to even more at the end. It is an unconscionable waste of taxpayer money on something that was never asked for or needed. We don't understand the zealous thinking on this small stretch of road. It does not advance pedestrian/biker connectivity. It is an unsafe road to nowhere. There is so much need for green space and parks elsewhere in the County, why spend \$1M+ on 0.4 of a mile where parkland is not needed and the solution is unsafe?

The road diet as it is now is very dangerous. I ask all of you to drive it at night or in the rain or at rush hour. It is dangerous at the CCT where there is no refuge. The left turning lane on Dorset headed east out of Kenwood is narrow and a tight turn, made even worse when a pedestrian is crossing. The right turn lane heading west out of Somerset is narrow because of the bollards and dangerous with pedestrians crossing. The bike lane going south on the Parkway is blind to those cars making a right turn west onto Dorset. That bike lane ends and there



is no connectivity to the CCT at Dorset because there is no direct lane except to use the county street. The 2 lanes traveling from River to Dorset have to suddenly converge into one lane without warning or proper signage as the traffic crosses Dorset. There have been many near misses there. When you enter the Parkway at Dorset traveling north, you come quickly face to face with on coming traffic because of the lack of median. It comes up quickly and is dangerous. The entry from Hillandale into the public pool and parking lot is narrow and crowded in the summer and now, when people use the parking lot to unload their bikes to get on the trail. The lane to exit or enter the pool parking lot right off the parkway is narrow and confusing. It should be made a one way entry into the pool because the CCT is so close and cars can run into it when turning onto the parkway while looking left while entering traffic. The pathway for pedestrians around the pool and to Arlington road and the parking lot beyond should not be removed. Also having a bike path that is bikes only will be hard to monitor. Pedestrians will use it, it will be unsafe for all (and what happens if a biker hits an armadillo and goes down in front of an adjacent travelling car?). Also please see Fire Safety Chief Adam Jones' letter of March 16, 2023 which clearly describes the safety issues at the crossing and the opposing lane configuration that exists now which is a problem for MCFRS use.

With all the safety issues that the changes to this Parkway have generated, it will take the MNCPPC time to work out the intersections. In the meantime please direct the County Parks Department to operationally change (no permit needed) to where the Parkway was in late June of 2022 with one lane N and one lane S on either side of the wide median and the CCT crossing with the wide median for refuge. In fact the Parkway has been safe as a four lane road. The fatal accident was in 2016, not much has occurred since. If MNCPPC is so concerned with "speeding" then put in traffic calming devices like speed bumps which already exist on the Parkway from River Road to Mass. Ave.

Thank you. Patricia Depuy Johnson



Although included herein for reference purposes, this letter is NOT the official position of DFRS and was superseded by a letter from Interim Chief J. Kinsley dated September 7, 2023.

MONTGOMERY COUNTY FIRE AND RESCUE SERVICE

Marc Elrich  
*County Executive*

Scott E. Goldstein  
*Fire Chief*

3/16/2023

Good Afternoon,

This letter is in regard to a concern brought to me by residents whom reside in the neighborhood area of Little Falls Parkway. Their specific concern is the newly constructed bike and pedestrian crossing area on Little Falls between Arlington Rd and Hillendale Rd. I was contacted because I am the Assistant Chief of the Safety Section for Montgomery County Fire and Rescue and I was asked to analyze the current crossing configuration for any hazards or concerns.

I have visited the area and watched multiple videos of that crossing and these are what I see as potential Hazards or concerns.

- The removal of the median strip that was previously in place between the 2 lanes of traffic exposes pedestrians and cyclists to an opposing traffic pattern. This leaves users no place of refuge as they cross. The previous configuration allowed people who used the crossing to focus on one vehicle at a time from a single direction.
- The different heights of vehicles that pass through the crossing create a situation where there is dynamic or constantly changing blind spots. These blind spots effect the motorists, the cyclists, and the pedestrian traffic equally. The intermittent line of sight combined with the opposing vehicle traffic can be problematic.
- With the recent adaptation of a narrowed street configuration prior to the crossing there is potential for emergency response vehicles to avoid that area during heavily congested hours of the day. This could result in emergency vehicles as well as civilian commuter traffic utilizing neighborhood streets to reach their destinations in the quickest way possible.

**Health & Wellness Section**

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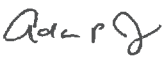
100 Edison Park Drive, 2<sup>nd</sup> Floor • Gaithersburg, Maryland 20878-3204  
240-777-2219 • 240-777-0725 TTY • 240-777-2443 FAX  
[www.montgomerycountymd.gov](http://www.montgomerycountymd.gov)

MCFRS drivers are trained professionals and have multiple hours of training on responding to emergencies in a safe and timely manner. Conversely, it is not a good practice for commuters, who we know are already distracted to navigate through residential neighborhoods trying to circumvent traffic slowdowns.

I do realize there are multiple issues associated with traffic movement and pedestrian crossing. At a quick glance, it would seem that a pedestrian bridge would alleviate many of these issues. However, I do realize there are many factors that go into making these complex decisions.

Thank you for taking the time to ask the Safety Section of Montgomery County Fire and Rescue to weigh in on this important community concern. Please understand MCFRS will always respond to the call of the community in a timely, safe, and professional manner. If I can be of any further assistance, please feel free to contact me directly.

Respectfully,

Adam P. Jones   
Assistant Chief  
Occupational Health and Safety  
Montgomery County Fire and Rescue Service  
14935B Southlawn Lane, 2<sup>nd</sup> Floor  
Rockville, MD 20850  
240-586-0989



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To: NCPC Staff

Comment Noted

Re: Little Falls Parkway Improvement Project

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Thank you. Patricia Depuy Johnson

## Comments to NCPC in Little Falls Parkway Environmental Assessment Scoping

It is unfortunate that this matter has reached your review in its current proposed state for the following reasons:

1. The process of reaching the Parks proposal has been badly flawed. The edict of the Montgomery County Council last November to Parks asking it to work with the citizens was “too little too late.” The Parks Department and the Planning Board made decisions on their own and failed to involve the citizens affected by their decisions from the beginning, which is the time it was important to involve them. The “Vision Zero” county policy that was adopted specifically stated that they were supposed to work with the communities. Sadly, they did not do so, resulting in many thousands of residents unhappy with a less than ideal outcome. There is great talent in our communities which was untapped or unheard. Reaching out and working together from the beginning could have resulted in a better plan and sooner, without the unnecessary delays and wasted expenditures that have occurred.
2. The County Council, while reaching the correct decision last May not to fund the unneeded and unwanted “linear” park next to a very busy roadway, disappointed the citizens it represents when it adopted a political compromise proposal in January to keep two opposing lanes rather than return the road to its original four lanes between Dorset Avenue and Hillandale Road. There were neither safety nor environmental reasons for changing that section of roadway to two lanes from the original four, except at the CCT crossing. Even there, the road diet had proved a good solution. There were three people on the Planning, Housing, and Parks Committee (PHP) who voted in November to present two proposals to the council, only the Parks proposal and a council alternative proposal of two opposing lanes but one on each side of the well-established median. Unfortunately, the proposals ignored what the overwhelming majority of citizens in the district wanted—to return to the four lanes originally built from Dorset Ave. to Hillandale Rd. and to maintain the previously installed road diet at the crossing. Subsequently, in January, the Council adopted the Council’s proposed alternative. The wishes of the primary users of the parkway, the District 1 residents, were dismissed without due consideration that should have been given in a democratic process. The process was not transparent or democratic, as government should be. Unelected bureaucrats should not be making decisions that are opposed to what the people affected by their decisions want without involving them from the beginning in making those decisions. I learned in high school civics class that in a democracy, elected and unelected officials are public servants. It never occurred to me in my government career to do anything other than serve my fellow Americans. During this process involving Little Falls Parkway, I have become doubtful of the motives of our public servants and was disappointed by the lack of government’s responsiveness to the citizens it represents.
3. Taking a step back, I ask you to look at the broader picture when it comes to an environment assessment (EA) which is your important responsibility at this stage. Instead of simply accepting what the Parks staff says, maybe you can play a more important role to reverse some of the damage about to be done. First, there were mistakes made at the start of the process by not

solving the problem of the Capital Crescent Trail (CCT) crossing over the parkway. There were never sufficient studies of two possible solutions to deal with this situation after the recumbent bicyclist was tragically killed at the crossing. The road diet solved the problem, and no fatalities have resulted since that time. Also, please look at the good safety record of the four-lane parkway back to 2016. There have been few accidents and no other fatalities except the freak accident at the crossing. One solution that was dismissed due to cost was a pedestrian/bicyclist bridge over the parkway. There is one such bridge over River Road and many other places that work well, and the funds could be raised. It would solve the problem entirely. A second solution is the path of the CCT. If you look at its path, taking a sharp left turn before the crossing in the northbound lane, it is almost impossible for drivers coming from Arlington Road to see cyclists coming suddenly into their vision to the left side of their cars before both are quickly at that crossing together. This situation is due to the short distance between Arlington Road and the crossing and the sharp left angle of the CCT that sends cyclists abruptly into a parallel position with vehicles on the road. If the crossing for pedestrians/cyclists could have been placed at Arlington Road where there is a traffic light that could manage the flow, it would have made far better sense. Why was that idea dismissed? The CCT could be curved easily into the Arlington Road crossing and connected easily on the other side, which would obviate the need for the separate crossing only a few feet away. Traffic disruption would also be reduced. Please take another look at these options and ask Parks to reconsider them. I think neither option was given due consideration.

4. It seems that Parks is attempting to give more to bicyclists than to vehicles. Roads were made for cars, not bicycles. They can be shared in reasonable ways, but it is still more of a risk to cyclists to be on the road. The Capital Crescent Trail is 100 feet away from the LFP and is already undergoing an improvement process. Both pedestrians and bikers use it, and the improvements should make it safer for each. Buffered lanes are good for emergency vehicle use, but there is no need for yet another bike lane that close to the CCT, which is already a safe bike lane.
5. Careful attention should be given to the turn lanes at Dorset Ave. and Arlington Rd. to make them safe for pedestrians to cross, but further signaling that produces further delays on a road that is already slow enough for vehicles to pass should not be created.
6. I also endorse the comments filed by Lloyd Guerci, Carl Becker, and Jenny Sue Dunner, Phyllis Edelman, and other members of our Coalition for a Safe Little Falls Parkway with whom I have worked for the past year and who have presented knowledgeable, sensible comments.

In conclusion, there are environmental issues were not studied by Parks and should have been. Environmental issues encompass a huge number of questions, and I hope you will consider them. It is better to make decision now to get it right rather than waste time and money in the wrong direction which will only prove to have been shortsighted in the long run. The LFP is not a road within a Park, it is a thoroughfare between Bethesda and the surrounding communities. Parks is wrong to have put the photo of LFP in between the ones of Sligo Creek and Beach Drive on its website. LFP is not comparable to the other two. Traffic is only going to increase as growth continues in this part of the county. Also, it was a mistake not to have coordinated more with the Westbard Sector Plan.



I have written my comments as a 43-year county resident and a current board member of the Westmoreland Citizens Association, which represents nearly a thousand households along the Massachusetts Avenue corridor for which the Parkway was built to take residents to businesses in Bethesda. Our board conducted a survey showing overwhelming support for returning to a four-lane parkway and road diet at the CCT crossing. Since you are the last rung in the chain of command in this comment process, I have said many things that may not be considered strictly environmental in nature but should be said somewhere. We are talking about improvements needed in the total LFP environment, in which all of these comments are pertinent. My point is to emphasize the undemocratic nature of the process and unconsidered alternative solutions for environmental improvements.

Respectfully submitted,

Sharon B. Whitehouse

Sr. VP and immediate past president, Westmoreland Citizens Association

Member, Neighborhood Coalition for a Safe Little Falls Parkway

March 29, 2024

# Parks are for All People



Capital Crescent Trail and LFP (9/8/2018)



Little Falls Parkway and Hillandale Road (May 25, 2020)