



**Chevy Chase**

**Advisory Neighborhood Commission 3/4G**

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November 15, 2013

District Department of Transportation  
ATTN: Wayne Wilson  
1100 4<sup>th</sup> Street, S.W.  
Washington, DC 20024

**Re: ANC 3/4G's Comments on Rehabilitation of Broad Branch Road, N.W.  
Environmental Assessment**

Dear Mr. Wilson:

Please note that at our duly noticed October 28, 2013 meeting, the Chevy Chase ANC 3/4G voted 4 to 2 (a quorum being four) to send you these comments on the October 21, 2013 Environmental Assessment (EA) of the Broad Branch Road, N.W. rehabilitation project supporting Alternative 4 and urging its adoption. Our ANC includes the northern end of Broad Branch Road from Linnean Drive to 27<sup>th</sup> Street, and the Road is an integral part of our community, not only as a utilitarian throughway but as a quasi-rural respite from the surrounding urban congestion. Thus, it is very important to our constituents that any major project involving this Road be carefully considered and the ramifications fully evaluated.

As an initial matter, we want to thank all of the District Department of Transportation's (DDOT's) staff and its contractors for your outstanding efforts in soliciting community input and in identifying and evaluating the myriad impacts that can be expected from such a major project. The public involvement began as far back as 2010 and has included public meetings at the Chevy Chase Community Center and at the Methodist Home, coupled with other opportunities for written or oral comments as the plans progressed. We also appreciate that you have assessed a number of alternatives before settling on the four that you present in the EA. In that process, you properly rejected options that would have significantly changed the character of Broad Branch Road – e.g., rejecting (1) widening the vehicular lanes, which would have increased capacity, (2) upgrading the road to “typical collector roadway design standards,” (3) raising the road profile above the 10-year floodplain, or (4) changing the roadway from two-way to one-way to allow space for cyclists. We believe the elimination of those alternatives is wise.

In assessing the potential alternatives that DDOT has evaluated, we focused on several key principles. *First*, Broad Branch Road is not currently a major commuter thoroughfare but is

largely a residential street that respects its proximity to the natural setting in Rock Creek Park. We do not want to sacrifice those key attributes, and each of the Alternatives evaluated by the EA should maintain that essential character of the Road. *Second*, DDOT has appropriately determined that significant steps need to be taken to upgrade the road and to protect the immediate environment around Broad Branch Creek. The existing inadequate stormwater drainage and the resulting erosion cannot be allowed to continue. The Soapstone Creek Culvert, in particular, must be replaced if the Road is to be maintained. The Road is also in dire need of structural and safety improvements that should not be postponed. *Third*, it is important to protect natural resources and possible historical and archeological sites to the extent that it is feasible. We appreciate that any work on the Road will have some impacts, but the long-run benefits should outweigh any potential degradations. *Finally*, any work on the Road should include consideration of enhanced pedestrian and bicycle uses that will connect our neighborhood with existing trails and bike paths. There are currently few safe ways to access the Rock Creek Park system of trails and bike paths from Chevy Chase without a car, and there are almost no pedestrian crosswalks on Broad Branch, which creates a significant safety hazard. DDOT has appropriately included pedestrians and bicyclists in its evaluation of options.

With these considerations in mind, we have assessed the EA alternatives and have reached the following conclusions:

- As the EA notes, Alternative 1 – the “no action” baseline – does not meet the project objectives and is not a viable choice. We are convinced that some action needs to be taken to maintain and improve the Road to assure minimal safety and environmental preservation.
- Alternative 2 meets the minimal requirements. Thus, this option is the least that can reasonably be done. It will certainly improve the Road materially and will preserve the current feel of the Road as an oasis in our urban environment. It also has the advantage of being the least expensive and shortest construction-duration option, which are relevant – though not controlling – factors. We note, however, that this option has a significant impact on trees, affecting about 285 trees with a diameter greater than four inches. In many instances, however, these trees will be impacted in any case because they are so near the Road that they need to be removed for safety or they are in danger of falling due to erosion from uncontrolled storm water. The planned Road rehabilitation will protect trees in the long run. Thus, although there will be a short-term impact on some trees, it is necessary to preserve the road and the surrounding environment.
- Alternative 3 addresses the District’s statutory mandate, enacted in 2010, to require installation of sidewalks whenever roads are reconstructed. DC Code § 9-425.01(a). Given this statute and the current obvious safety hazard for any pedestrian on this segment of Broad Branch, DDOT would have to make a strong case for an exception under § 9-425.03(a). Although there may be considerations such as costs, the need for additional right of way, or the impact on trees that could justify construction without sidewalks, we do not find that those factors outweigh the need for pedestrian use and safety. Sidewalks would give Chevy Chase residents, among others, much easier walking, hiking, or jogging access to



the Rock Creek Park trail system, thus furthering the goal of developing a more livable city. While the cost of this option and the duration of construction are greater, it will be a sound long-term investment, and the sidewalk will not be unduly expensive. If we are going to undergo the disruption related to construction, it is worthwhile to include the sidewalk enhancement at the same time. It certainly would be more expensive and disruptive to add a sidewalk on the west side of the Road at some later time when the need is even more pressing. This alternative will also impact about 177 additional trees above those that will be impacted by Alternative 2. Of course, we expect DDOT to take all reasonable steps to minimize the impact on trees from Alternative 3, but we believe the benefits of a safe pedestrian pathway outweigh any countervailing considerations.

- Alternative 4 is a desirable enhancement to make Rock Creek Park more accessible to bicyclists. It is currently not at all safe for bicyclists on the Road. Sight lines are too short, and cars trying to pass bikes run a high risk of accident, both for cars and bikes. Bicyclists do have alternatives to Broad Branch, including Ridge Road, although those routes may be longer and less desirable, particularly for bike commuters. The costs of this option are somewhat greater, and the construction duration is longer, but, like the sidewalk addition, we believe it is worthwhile to make this addition now. Importantly, Alternative 4 has no greater impact on trees than Alternative 3. Thus, there can be no reasonable argument against adopting Alternative 4 based on its impact on the trees adjacent to the road.
- With respect to the three sub-options that were evaluated, we did not find cost or schedule information in the EA that would permit us to assess the comparative value of these options. Assuming that the cost and schedule impact are not unreasonable, however, all three seem to be desirable.<sup>1</sup> Option A – somewhat longer retaining walls to avoid cuts for roadway side slopes – would provide greater erosion protection, reduce the number of impacted trees, and the additional length of retaining walls is not significant in the context of the amount of retaining walls already being contemplated. Option B – the installation of a short segment of sidewalk to connect the Soapstone Creek trails to the parking lot at Breach Drive – also seems like a reasonable enhancement for minimal cost. Option C – reconfiguration of the “Y” intersection at Brandywine to a “T” configuration – will enhance safety at this intersection but will sacrifice the small “park” area that currently exists. The safety considerations appear to be more significant.

Based on our analysis, our ANC urges DDOT to adopt Alternative 4, but with some caveats and reservations. *First*, we urge DDOT to coordinate the Broad Branch Road rehabilitation with DC Water and Sewer’s Soapstone Valley Park Sewer Rehabilitation Project and DDOT’s Replacement of the 27<sup>th</sup> Street, N.W. Bridge over Broad Branch Stream. These major projects will each impact the Road rehabilitation and the surrounding area, and they

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<sup>1</sup> Of course, Options A and B will not be necessary if DDOT adopts Alternative 3 or 4 because those improvements are included within those alternatives.

should be synchronized to the extent possible to minimize disruptions. *Second*, DDOT should also coordinate construction schedules with the expansion that is being planned at Ingleside at Rock Creek (a senior living facility in our ANC with an exit on Broad Branch Road between Linnean Drive and 27<sup>th</sup> Street). That project is still about two years away, but DDOT should take steps to be sure that Ingleside residents will not be blocked in from construction on Broad Branch Road while also being blocked by the Ingleside expansion construction. *Third*, DDOT should use the opportunity of the Broad Branch Road rehabilitation to improve or replace sewer and power lines that run under of over the Road. It would certainly be an opportune time to bury Pepco lines along the Road. *Fourth*, DDOT should limit tree removal where feasible and replace as many trees as possible. *Fifth*, DDOT should work proactively with adjacent landowners to resolve any issues about right-of-way acquisition. *Finally*, DDOT should use pervious pavements for the pedestrian walkway and the bike path to the greatest extent possible. We believe these steps can be included in Alternative 4 and will help to protect the community and the environment.

Thank you again for your thorough efforts. Please contact us if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim McCarthy". The signature is fluid and cursive, with the first name "Jim" and last name "McCarthy" clearly distinguishable.

Jim McCarthy  
Chair, ANC 3/4G

cc: Council Member Mary Cheh  
Chevy Chase Listserv  
Adam Tope, Chair, ANC 3F  
Jonathan Bender, Chair, ANC 3E