



September 21, 2020

The Hearing Examiner, Department of Transportation
Montgomery County Maryland
cc: The Montgomery County Council

Reference: AB-771, Abandonment Hearing, September 14, 2020

FOSC written testimony on abandonment of Ellsworth Drive

Friends of Sligo Creek is a nonprofit community organization dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed.

We oppose abandonment of the roadway of Ellsworth Drive between Georgia Avenue and Fenton Streets. Our reasons:

1. Abandonment is allowed for public safety and/or lack of public use reasons. Neither is the case here. In fact, the space has had, is and is projected and planned to encourage significant public use. This should be sufficient reason not to authorize abandonment.
2. The Planning Board required, as a position of its approval of plastic turf, that the developer submit an alternate proposal. This has not happened. No additional related approvals should be passed at least until such an alternative is proposed by the developer.

"The Abandonment is requested at the direction of other County agencies such as the Montgomery County Department of Transportation (MCDOT) and Montgomery County Department of Permitting Services (MCDPS), in coordination with Site Plan Amendment No. 81999002M, to allow the

Applicant's design which includes numerous non-standard pavement treatment types."

County asks applicant to apply for abandonment, using nonstandard and nontraditional paving material/roadway material language

3. Why would the county remove jurisdiction from the street when the developer's argument for approval is that the expected pollution will be captured by county run stormwater facilities? Intentional polluting isn't legal, and should definitely not be pre-authorized. This is illegal. Even the manufacturer doesn't recommend the type of stormwater system in place to handle plastic turf.
4. The significant health, heat, hardness, stormwater and other issues with plastic on Ellsworth will become more difficult to address if the road becomes entirely private.

As had been documented in other testimony, gluing plastic turf directly to asphalt is non-standard methodology – not recommended by the manufacturer for heavy foot traffic or vehicular. This setup can be expected to exacerbate degradation of the surface, increasing the burden on the stormwater filtration system. It will be harder than it is typically (which already is harder than grass turf. Experts have estimated it is expected to be hotter than asphalt. It will be exceptionally difficult to keep clean. It is not designed for heavy vehicle use – fire trucks, etc. Why would the county in effect endorse this scenario by abandonment?

Don't abandon this roadway – make it be environmentally friendly and safe. This position should be the baseline position for the county regarding a prime public space in a major population center.

Kit Gage

Advocacy Director

Friends of Sligo Creek

advocacy@fosc.org, www.friendsofsligocreek.org

PO Box 15672, Takoma Park, MD 20913