

Jasmine Forbes

From: carolsimsjohnson@gmail.com
Sent: Wednesday, April 27, 2022 4:43 PM
To: Planning External Mailing; Jud Ashman; Neil Harris; Lisa Henderson; Jim McNulty; Ryan Spiegel; Robert Wu
Subject: Do not approve Car Wash on S. Frederick Ave

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Hello, I am writing to state my opposition to the Whip Clean Carwash proposed a few blocks from my house. This facility is not needed, it will cause traffic problems, it is not suited to the Master Plan for South Frederick Ave which calls for a mixture of residential and light commercial. We have seen no new residential facilities but instead will soon have a new (also unnecessary) gas station.

There are representatives on the City Council who ran with the platform of supporting East Gaithersburg. We need to meet the needs of our community, which include many things besides being able to wash their cars. Talk to my congregation at Seneca Creek Community Church and you will learn what the real needs of this community are.

Say No to the Whip Clean!

thank you, Carol Johnson

Jasmine Forbes

From: Kathryn George <kay.george@verizon.net>
Sent: Wednesday, April 27, 2022 4:45 PM
To: Planning External Mailing; Jasmine Forbes; Lisa Henderson; Neil Harris; Jim McNulty; Ryan Spiegel; Robert Wu; Jud Ashman
Subject: Opposition letter re: 601-607 Fred Av Car Wash

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April 27, 2022

Mayor Jud Ashman
31 South Summit Ave
Gaithersburg MD 20877
301-258-6300
Jud.Ashman@gaitersburgmd.gov

Gentlemen:

sent by email 04/27/2022 @ 4:30 pm

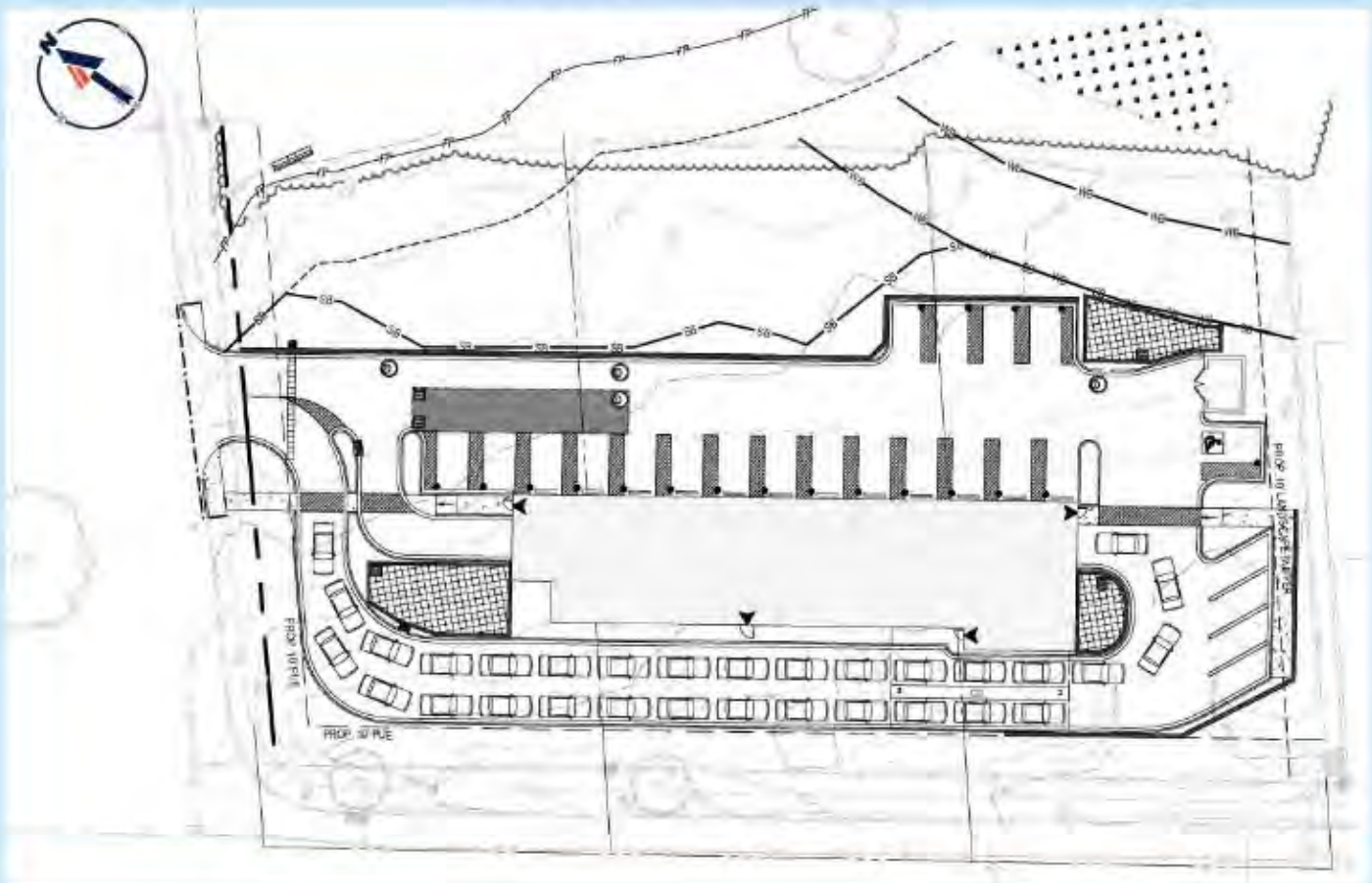
I am writing regarding the Proposed Whip Clean Car Wash for 601, 605, & 607 South Frederick Rd (corner Central Av), Gaithersburg MD, as SP-8819-2021 and listed under "projects in the city." I am against this proposed project. Please see concerns stated with my letter of May 19, 2021 (Exhibit 62), which I reiterate and expand here.

1) Plant operation: As described at the March 21, 2022 City Council meeting, hours of plant operation are 9-6 Monday through Saturday and 9-4 Sunday. There are expected to be four to five employees on site and four employee angled parking places. Engineering designs showing layout, side views of the plant, and various cross-section and other features were submitted (Exhibits #79 and #102); but no written description of plant operation was found by this reader.

See below, "Stacking Exhibit," page 22, from Exhibit #102, prepared by the carwash developer.

From Central Avenue, on the left, customers enter the car wash and file into two lines at the bottom of the map, running from north to south. At the southern end, which is the car wash tunnel entrance, the two lines merge into one and one car at a time is hitched to a heavy chain

Stacking Exhibit



mechanism and hauled through the car wash. The driver remains in the car, but does not touch the steering wheel, the gas pedal or the foot brake. After exiting the north side of the tunnel, the driver can leave or can turn right, to drive his car to one of 18 vacuum drying locations to clean the interior. The vacuum drying equipment is laid out as 14 long (north to south) on the west side of the long car wash tunnel and four long facing them, further west. Further west (on top of the map) are a small stream that runs into Muddy Branch stream and trees.

To clean the interior, the driver parks his car by a vacuum, flips a switch, opens the front door then the back door on one side and vacuums. It is unclear how noisy vacuum blowers are. Then the driver opens the doors on the other side of the car and vacuums there. Then he rolls up the vacuum tube and leaves. The early traffic report (Exhibit #113, by Lenhart Traffic Consulting) said Evening peak trip on weekdays is 78 cars/hour (pg13), which seems to be 39 in and 39 out.

Question #1: What is peak number of cars, at the evening weekday peak, handled per hour by the car wash? Is it 78? Or is it 39? If 39, that is one car per 1.5 minutes. If 78, that is one car per 0.76 minutes, which seems impossible.

Regarding other peak times and days (pg 14), the morning weekday peak is 19 cars in and 20 cars out, so 39 cars/hour. The Saturday peak is 19 cars in and 22 cars out, so 41 cars/hour.

Question #2: What is the Sunday volume of cars? (Sunday was skipped in the traffic report, but Sunday hours are 9-4.)

Question #3: Furthermore, what are the off-peak volume of cars, as a range, for evenings and morning hours on weekdays? Is there a rough estimate? Also, for Saturdays? For Sundays?

2) Existing Traffic in Nearby Roads: As is well known, Rt 355, which was formerly four lanes, has been expanded to six lanes, with three running north and three south. Central Av is two lanes, with one running east and one west.

To calculate CLV or Critical Lane Volume capacity of a road, for existing traffic, one sets up a camera and records the vehicles traveling through a corner, as well as those turning right and those turning left. One might record this data for several hours in the mornings and several hours in the early evening. To complete the calculation, one needs a Land Use Factor or LUF.

(See http://www.ce.memphis.edu/smishra/PDFs/Conference/2013_TRB_DDI.pdf and pg 9.) For driving through the corner and turning right, when the road is one lane LUF = 1.00. For two lanes, it is 0.55, for three lanes, it is 0.35. For vehicles turning left, at one lane, LUF is 1.00, for two lanes, it is 0.60, and for three lanes, it is 0.40.

In Exhibit #113, the Lenhart Traffic Consulting report measured traffic on Rt 355 at the corner with Central Avenue as just over 1,500 cars/hour MD355 Southbound from 7:15 to 9:00 am. It measured traffic on Rt 355 as over 1,700 cars/hour MD355 Northbound from 4:30 to 6:45 pm. Because there are three lanes, the LUF selected by engineers was 0.40. This discounts all that traffic. It cuts the Rt 355 fraction of road figure by more than half.

To each figure are added two tiny fractions of road traffic from Central Av, where both are under

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50, and both are multiplied by a LUF of 1.00, because Central Avenue is one lane each way. However, applying a LUF of 0.40 to Rt 355 traffic reduces total importance.

City of Gaithersburg has a CLV guideline of 1,450 in all conditions. But if existing traffic is cut by more than half, it becomes easier for a project to meet the target.

3) Primary or Additional Traffic to the Car wash Project: New traffic engineering projects like the car wash will attract some cars to enter the site to be washed clean. In categorizing traffic, some planners figure three categories (<http://www.mikeontraffic.com/trip-distributions/>). Traffic for new projects is classed as:

*! Pass-By. Traffic already traveling past the new project, that will swing off and make an intermediate stop, without a route diversion;

*! Diverted. Traffic attracted to the new project, without direct access to the site. For example, a diverted trip example is a through trip on a freeway that diverts to an exit and a project, adding traffic to the local road but removing traffic from the freeway. Diversion is not applicable here.

*! Primary or New. Traffic makes a specific new trip to visit the site.

The Exhibit #113, Lenhart Traffic report assumed car wash traffic is 50% pass-by and 50% new. This was their initial, early assumption. To figure new traffic, they seemed to apply 50% new to 78 and they subtracted 50% of 78 from existing traffic (or perhaps I misunderstood). They may change the assumption with time.

4) Car Wash Owner Selling Monthly Tickets to Attract Repeat Business. As seen with his Bowie MD location

(<https://www.whipclean.com/wash/>), the proposed car wash owner is selling monthly memberships,, where a car owner can pay the monthly rate and get repeat washes. At Bowie, Whip Clean sells full service VIP membership at \$59/month for wash, dry, interior clean and more, with unlimited washes for the month. Else, the driver can buy Exterior Only at \$39/month, also with unlimited washes per month. For occasional customers, the Bowie Whip Clean sells one-shot complete or basic car wash services, just for that day. Clearly, the proposed car wash owner is hoping to attract repeat customers, to be a high-volume business (which will attract more traffic).

5) Possible Queue Out into the Street. For Gaithersburg, the early traffic report (Exhibit #113, by Lenhart Traffic Consulting) states minimum queueing is projected for the proposed car wash (pg 19), by a SimTraffic queueing evaluation, probably because the car wash can stack two lines of about 31 cars on the property before the first car enters the car wash tunnel.

Nonetheless, one must be aware that the driveway entrance into the car wash on Central Avenue is about 100 ft from Rt 355, which is 4-5 cars. Will all car wash customers be caught with the 31 cars in two lanes leading to the car wash tunnel? Or will additional cars spill out into a queue on Central Avenue an, with some on Rt 355 northbound?

6) Minor point: Dates for Raw Traffic Data. Please note that dates vary. Raw Traffic data, throughput and turns, Monday-Friday and Saturday, were collected Mar 02 2022 for Rt 355 & Fairbanks Dr and Rt 355 & Deerpark Rd, pg 22-23. Raw data was Oct 13, 2021 for Rt 355 &

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Central Av, pg 24. There is no data now for Sunday.

Possible additional considerations are the need to consider bus blockage. One also needs to consider additional traffic measures on same date. For example, new houses are under construction further east on Central Avenue, perhaps slightly increasing traffic. In addition, there are two churches on Central Avenue and future car wash customers, who want to turn south onto Rt 355 on exiting the car wash, might drive into their driveways to turn around in their parking lots. Would this usage "rip up" the church parking lots?

7) Traffic Study Requested from Maryland State DOT in 90 days. Because I was worried about traffic problems form the proposed car wash, I requested a traffic safety study. Rt 355 is a Maryland state highway. This study was begun April 11, 2022.

A close family member was killed in a pedestrian auto accident, when hit by a drunk driver, while walking across Rt 355 from Rosemont Drive to gas station, in the cross walk, on Aug 04, 1976. In 1976, Rt 355 was four lanes, with no light at South Westland. In addition, a lady bicycle rider was recently killed at Rt 355 and South Westland in late 2021, with a "ghost bicycle" placed for her, at that corner. Consequently, I briefly described the proposed car wash and asked Maryland State Highway Admin (in MD Dept of Transportation), to do a traffic safety study for Rt 355 and Central Av. and they were agreeable.

By email, MD DOT said they will analyze crash data for Central Av and Rt 355. They will analyze if a traffic light is needed. Furthermore, they "will check other nearby corners (355 corridor from So Westland to Education Blvd)". Work started April 11 and requires about 90 days. I said if City of Gaithersburg decides to ask for such a study, that DOT could combine the two reports. (Note that Md DOT contact information is on the Gaithersburg website for Completed Projects and Everbrook Academy (child care) at 151 Lakelands Dr, where the project was turned down.)

8) Process Water Treatment and Pollution Control. As is logical, a car wash uses water to wash cars.

The proposed car wash will "recycle" the water used. This is not sediment control, stormwater management (e.g., rainwater on the parking lot), tree variance for three property trees, which seem to be over-emphasized as they are "categories" of past rules and regulations and now "check boxes" for the reviewing staff.

For the car wash, process water, used to clean cars, is a critical concern, which may not be a factor for other projects that do not manufacture or service goods. This car wash states it will "recycle" process water used. There are tanks underneath the facility. Waste water is filtered in three levels. Debris is collected from the bottom tank. It is unclear how this process works.

It is unclear if City of Gaithersburg is reviewing design, construction and installation of the wastewater treatment system. A "clean" segment of water in the tanks is removed and reused to clean cars. Some water may be naturally filtered by soils (upgradient of the Muddy Branch stream) or perhaps I misunderstand. Some water that has been "cleaned," will be discharged as storm water to Washington Suburban Sanitary Commission.

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Gaithersburg states, the Subject Properties are currently served by Category W-1 and S-1 of Washington Suburban Sanitary Commission (WSSC) services. The subject properties are currently two residential houses, with no commercial waste eater.

Gaithersburg says "therefore, the application complies with the requirements of the City's Adequate Public Facility Ordinance (APFO) for water and sewer." However, is a new review required when proposed use changes from residential use to a commercial property with a large volume of process waste water? It is bad faith to dump chemical waste water into storm water drains of WSSC. How "clean" will the filtering system make the process waste water?

9) Nearby Muddy Branch Stream, with litter. As shown in various exhibits, the three properties labeled as 601-605-607 South Frederick Rd on the corner with Central Avenue, where the proposed car wash would be located are just west of the initial branches of Muddy Branch stream. Gaithersburg states, "the Properties are located within the Muddy Branch watershed." Project wants "to install and maintain a retaining wall located outside of the stream valley buffer boundary." The developer is requesting a waiver to construct the retaining wall.

The larger issue is that the stream is not a part of the subject properties, but is located slightly west of them. The stream area contains a great deal of litter and trash. This is not the fault of the proposed car wash developer or the existing owners of the three properties.

See Appendix A with five photos, taken April 03, 2022. Again, litter in the stream is not the fault of the proposed car wash owner or existing land owners. The stream and surrounding property is owned by another landowner, but it all seems to be located in the City of Gaithersburg.

10) Some low YELP Bowie Car Wash Reviews. See <https://www.yelp.com/biz/whip-clean-car-wash-bowie>. This Yelp business site shows Whip Clean Car Wash in Bowie MD.

There are 131 reviews as of April 27, 2022. It is difficult to read the reviews. One must hit "Write a review" in the red box. This action opens a new page, but you do not need to write anything. Just read the comments which appear in a column on the right. Scroll down to read more. Average score for the business is 2 out of 5, where 1 = poor and 5 = great.

CONCLUSION: As noted, I oppose this car wash project because a busy, high traffic commercial operation will change the character of the area. Central Avenue is a residential neighborhood, zoned residential, with

children and families living in houses with yards and gardens.

High traffic at the carwash will lead to accidents, affecting property and possibly people. A sad fact of CLV calculations that apply a Land Use Factor, is that residential neighborhoods next to a busy road like Rt 355, is that the wider one makes the busy road, the lower the LUF factor, so the less traffic on the busy road "counts." Clearly, high traffic leads to lower property values.

In addition, perhaps Gaithersburg would engage an environmental or chemical engineer to estimate chemical content of car wash waste water and how well it is managed by a filtering and

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recycle operation. What is the content of remaining "sludge?" Can waste water be added to municipal WWSC storm water safely - pollution dilution - or is this a bad idea?

Thank you for your attention. Should you have any questions, please feel free to contact me at the phone or email below.

Sincerely yours,

Kathryn E. George
16625 Alden Ave Gaithersburg MD 20877-1503 301-869-4948 kay.george@verizon.net

copies:

Council Member Lisa Henderson at Lisa.Henderson@gaitthersburgmd.gov Council Member Neil Harris at Neil.Harris@gaitthersburgmd.gov

Council Member Jim McNulty at Jim.McNulty@gaitthersburgmd.gov Council Member Ryan Spiegel at Ryan.Spiegel@gaitthersburgmd.gov Council Member Robert T. Wu at Robert.Wu@gaitthersburgmd.gov

City Planning Dept at planning@gaitthersburgmd.gov

Planner Jasmine Forbes at Jasmine.Forbes@gaitthersburgmd.gov

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APPENDIX A, 04/27/2020

Photos from Sunday, April 03, 2022, looking at the stream in back of the proposed carwash at 601-605-607 Frederick Avenue, abutting Central Avenue. These photos were shot from the sidewalk on Central Avenue, looking down at the stream. One photo show the (cleaner, neater) scene across the street on the north side of Central Avenue.

Caption for each photo is on top of the photo.

1) For the photo below, top is water, bottom is large black plastic trash bag, with a light green liquor bottle and white plastic trash. Bottle is just to left of cement foundation.



2) Stream and white paper trash near the sidewalk.

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3) Trash to left of stream, if standing on sidewalk by iron fence looking down.

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4) Trash to right of stream - plastic laundry basket and hangers. Plus black & white blanket.



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5) North side of Central Av and CLEAN stream, with mowed grass and wooden bridge.



(last line of document.)

^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^^

Jasmine Forbes

From: Dave Brown <brown@knopf-brown.com>
Sent: Wednesday, April 27, 2022 4:54 PM
To: Jasmine Forbes
Subject: Final Submission for my clients, Whip Clean Car Wash, by Knopf & Brown
Attachments: CCF_000224.pdf

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Jasmine, Here is my final submission. A separate filing will be made of the final submission of our traffic consultant.

Best regards,
Dave Brown
Knopf & Brown

KNOFF & BROWN


503 WOODLAND TERRACE
ALEXANDRIA, VIRGINIA 22302
(301) 335-5646

DAVID W. BROWN
SOLE PRACTITIONER
ADMITTED IN D.C. & MD

EMAIL BROWN@KNOFF-BROWN.COM

MEMORANDUM

To: Jasmine Forbes, Lead Planner
SP-8819-202 1, Whip Clean Car Wash Concept Plan
Gaitherburg Planning and Code Administration

FROM: David W. Brown 

DATE: April 27, 2022

RE: Update of Opposition to Concept Plan

This memorandum provides you a final update on my clients'¹ continued opposition to the proposed Whip Clean Car Wash and, more particularly, the Concept Plan to be acted upon by the Mayor and City Council in May. As briefly noted in the limited time available at the initial hearing on March 21, 2022, the Concept Plan is deficient in at least three critical subject areas and should not be approved. On behalf of my clients, I request that staff concur and recommend that the Mayor and City Council reject the Concept Plan.

1. Master Plan Inconsistency

Under § 24-160G.7(b)(3), the Council can approve this Concept Plan only after expressly finding that it “is in accord with the area master plan and any accompanying special condition or requirements in said master plan.” In this case, there is no question that the “area master plan” is the 2001 Frederick Avenue Corridor Land Use Plan. For this specific location, that Plan calls for uses such as “offices, light retail or live-work units in low-rise buildings” The proposed car wash, however, is a much more intense use than any that can be described as “light retail” and more intense than other unnamed uses that can be

¹ You have requested the names and addresses of the concerned citizens from the area of the proposed car wash that I represent. A complete list of my clients is **Attachment 1** to this Memo.

likened to those enumerated. For this reason, most jurisdictions limit car washes to industrial zones or major commercial areas that are well separated from single-family residences. For example, next door in Montgomery County, of the 27 zones established in the Zoning Ordinance, only five allow car washes as a conditional or limited use, and of these three are industrial zones. Montgomery County Code § 59.3.1.6. By contrast, the Concept Plan envisions locating the car wash on property adjacent to properties zoned and used as single-family dwellings, where many of my clients live.

Evaluation of master plan consistency must also take into account the terms under which this property was annexed by the City from Montgomery County in December 1989, in Annexation Agreement X-150. Exhibit 12. That Agreement specified that “redevelopment should have a residential character,” and appropriately placed the property in the C-B zone. A car wash is **not** included among the permitted uses in that zone. Ever since 1989, the City has envisioned the area annexed to be a transition zone to less intensely developed residential properties to the north and east. The property has not undergone development since the Annexation, and the subsequent 2001 Corridor Plan continued the same vision for this area as is found in the Annexation Agreement.

The “residential character” requirement for redevelopment does not mean, however, that there was either a requirement or even an expectation that the property should be developed with residential uses. Rather, the Agreement and Corridor Plan recognize that it was unlikely that the deteriorated single-family residences on the property, confronting busy S. Frederick Avenue, would be redeveloped to the same use. Consistent with the Plan, for example, maintaining a “residential character” could be achieved by redeveloping or replacing the existing residential structures on the property with residential-appearing commercial or professional offices.

The Applicant emphasizes that under the 2001 Corridor Plan, the property was rezoned from C-B to CD, in which a car wash is a permitted use. But the permitted uses in the CD zone, rather than being precisely specified, are described in sweeping generic terms. Subject to only eight specific prohibited uses and four special exception uses, what is permitted in the CD zone is “All uses listed as permitted and not solely as special exceptions or conditional uses in **all zoning districts . . .**” § 24-160G.2(a) (emphasis added). Hence, notwithstanding the newer CD zoning, that action was a far cry from a legislative judgment that a car wash is an appropriate use at this location. Rather, the appropriate way to evaluate the suitability of any of the uses within this “catch-all” CD zone terminology (of which a car wash is just one example) is to closely evaluate whether the use at this location is consistent with the 2001 Corridor Plan, which is exactly what is required under § 24-160G.7(b)(3).

This approach also has the benefit of reconciling to a consistent, coherent whole the acceptance of the property into the City under the C-B zone and the subsequent rezoning to the CD zone, and obviating any claim of violation of the Annexation Agreement on account of the rezoning.² In other words, so long as any use permitted in the CD zone but not in the C-B zone would pass muster under the Annexation Agreement, there should be no concern. The use, simply put, must be implemented in a manner that preserves the “residential character” of the area, as explained above.

2. Environmental Standards Waiver Request is Unjustified

Much of the property is environmentally sensitive and protected by environmental buffers. The Applicant seeks a waiver to encroach on three environmental buffers: wetland, stream valley and floodplain. The Applicant emphasizes that the intrusion into the environmentally sensitive areas has been reduced from what was contemplated in the original waiver request. But that cannot be dispositive, or an applicant would not be incentivized to design a project with the least possible environmental impact in the first place. Rather, to justify a waiver, the Applicant must demonstrate an unnecessary or undue hardship arising from full compliance with the environmental standards. No such hardship has been shown, as the following points reveal:

- a. There is no evidence a smaller car wash operation, respecting all the buffer limits, was even considered.
- b. There are many CD-zone permitted uses that could be established there without any buffer encroachments. Their feasibility has not been considered, either.
- c. Lastly the Applicant is not the property owner, just a contingent purchaser. So even if denial of the waiver meant the demise of the project, that will be no meaningful hardship to the Applicant. It would have no real property-based loss, only a lost opportunity cost for a speculative business venture, leaving it free to look **elsewhere** for a property that would need no environmental waivers for its car wash.

It also bears mentioning that in its first iteration, the plans for the car wash showed a larger intrusion into environmentally sensitive areas than the current plan. This reflected the Applicant’s initial decision to prioritize the space requirements of the car wash over the environmental constraints of the site. The magnitude of the resulting intrusions into the environmental buffers was not well received upon staff review. The revised environmental waiver request is a considerable improvement from that perspective, but it also reveals that

² Under 24-9, 24-196.1 and 24-244, when, as is proposed here, a property is first redeveloped following annexation, the Annexation Agreement should be honored, not violated.

the site is simply too small, given its environmental constraints, to comfortably accommodate the space needs of the car wash. Specifically, the reduction of the environmental buffer intrusions comes at the expense of providing a critical feature of operational success: an ample parking drive aisle width. The Applicant now seeks a waiver it did not seek with the first set of plans: to reduce the drive aisle to 21 feet, or five feet below the minimum requirement of 26 feet, a 20% reduction, made even more significant by the abutting 3-foot high wall separating the site from the environmentally protected area. Put another way, the continuing need for an environmental waiver, notwithstanding a problematic shrinking of the drive aisle, is just one more instance of a flawed attempt to fit a square peg car wash into too small a round hole parcel of land.

3. Adequacy of Transportation Facilities

Concept Plan approval requires a finding by the Mayor and City Council that **“existing and planned public facilities are adequate to service the proposed development....”** 24-160G.7(5). Particularly relevant under this standard is the adequacy of the public streets and roads to serve this facility. In this case, a close look at the intersection of South Frederick Avenue (a State Roadway) and Central Avenue (a City residential street) is needed. This evaluation requires much more than what is provided in a typical critical lane volume analysis such as the Applicant provided. This was done by our traffic consultant, O.R. George & Associates, Inc. as reported in Exhibits 60 and 78. In response to the Applicant’s March 31, 2022 “Site Access Evaluation,” i.e., Exhibit 113, our traffic consultant has prepared an update to Exhibits 60 and 78, which is being submitted contemporaneously with this Memo. As the issue of adequacy of public facilities is essential to the City’s evaluation at this stage, we request that the following factors be noted:

- a. Perhaps nothing points to inadequacy in the operation of a roadway at a particular location more than the number of crashes (or accidents) that occur there over time. In Exhibit 73 the Applicant provides data showing that **recorded** accidents have increased more than three-fold between 2015 and 2019 (i.e., from 3 crashes in 2015 to 10 in 2019).
- b. In addition, the State Highway Administration saw fit (in 2018-19) to restrict left-turns from Central Avenue onto South Frederick Road at all times. My clients, who use that intersection daily, confirm the persistent violation of the left-turn restriction, which underscores the access pressures and constraints that the community faces.
- c. In order to fit the proposed carwash on the tight and environmentally constrained site, the Applicant is requesting waivers to reduce the parking aisle width (from

the 26 ft, minimum to 21 ft.). This is in conjunction with an entry way that has been designed to accommodate both entering and exiting vehicles within one undivided driveway.

These concerns are corroborated by our traffic consultant's analyses. They confirm that the site is simply much too constrained for the proposed car wash use. It is just not the proper location, and placing it in this location would not be in the public interest.

CLIENTS OPPOSED TO SP-8819 2021, WHIP CLEAN CAR WASH CONCEPT PLAN

Victor Roa
614 Poplarwood Place
Gaithersburg, MD 20877
vbrea@yahoo.com

Betsey Hasegawa
608 Poplarwood Place
Gaithersburg, MD 20877
grhasegawa@verizon.net

Nelly Cojom
608 Poplarwood Place
Gaithersburg, MD 20877
Cojom12@yahoo.com

Rigoberto Cojom
608 Poplarwood Place
Gaithersburg, MD 20877
cojom12@yahoo.com

Sean Salve
103 Central Avenue
Gaithersburg, MD 20877
salvesean@gmail.com

Peter Norgbedzi
100 Central Avenue
Gaithersburg, MD 20877
delagbedzi@yahoo.com

Tracy Burnell
603 Poplarwood Place
Gaithersburg, MD 20877
Tlvnumber3@yahoo.com

Michael Burnell
603 Poplarwood Place
Gaithersburg, MD 20877
tlvnumber3@yahoo.com

Pedro Pantojo
626 Poplarwood Place
Gaithersburg, MD 20877
javipanto@hotmail.com

Tonimaria Ayres
111 S. Summit Avenue
Gaithersburg, MD 20877
cwtoni@msn.com

Rudy Porter
204 Central Avenue
Gaithersburg, MD 20877

Tue Phando
602 Poplarwood Place
Gaithersburg, MD 20877

Ngogun Ho
602 Poplarwood Place
Gaithersburg, MD 20877

Patty Hunt
601 Poplarwood Place
Gaithersburg, MD 20877

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Jasmine Forbes

From: Dave Brown <brown@knopf-brown.com>
Sent: Wednesday, April 27, 2022 4:58 PM
To: Jasmine Forbes
Subject: Final Traffic Consultant Submission
Attachments: ORGA's Letter in Response to Exhibit 113 (Lenhart Consulting Submission).pdf

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Jasmine, Here is the final submission of our traffic consultant.

Dave Brown, Knopf & Brown

O. R. GEORGE & ASSOCIATES, INC.
Traffic Engineers – Transportation Planners

9320 Annapolis Road, Suite 320 • Lanham, Maryland 20706
Tel: (301) 794-7700 • Fax: (240) 467-2689
Email: ogeorge@orgengineering.com

April 27, 2022

David W. Brown, Esquire
KNOPF & BROWN
401 East Jefferson Street, Suite 206
Rockville, MD 20850

RE: City of Gaithersburg Concept plan Application No. SP #8819-2021:
Submission on Site Access and Adequacy of Transportation Facilities

Dear Mr. Brown:

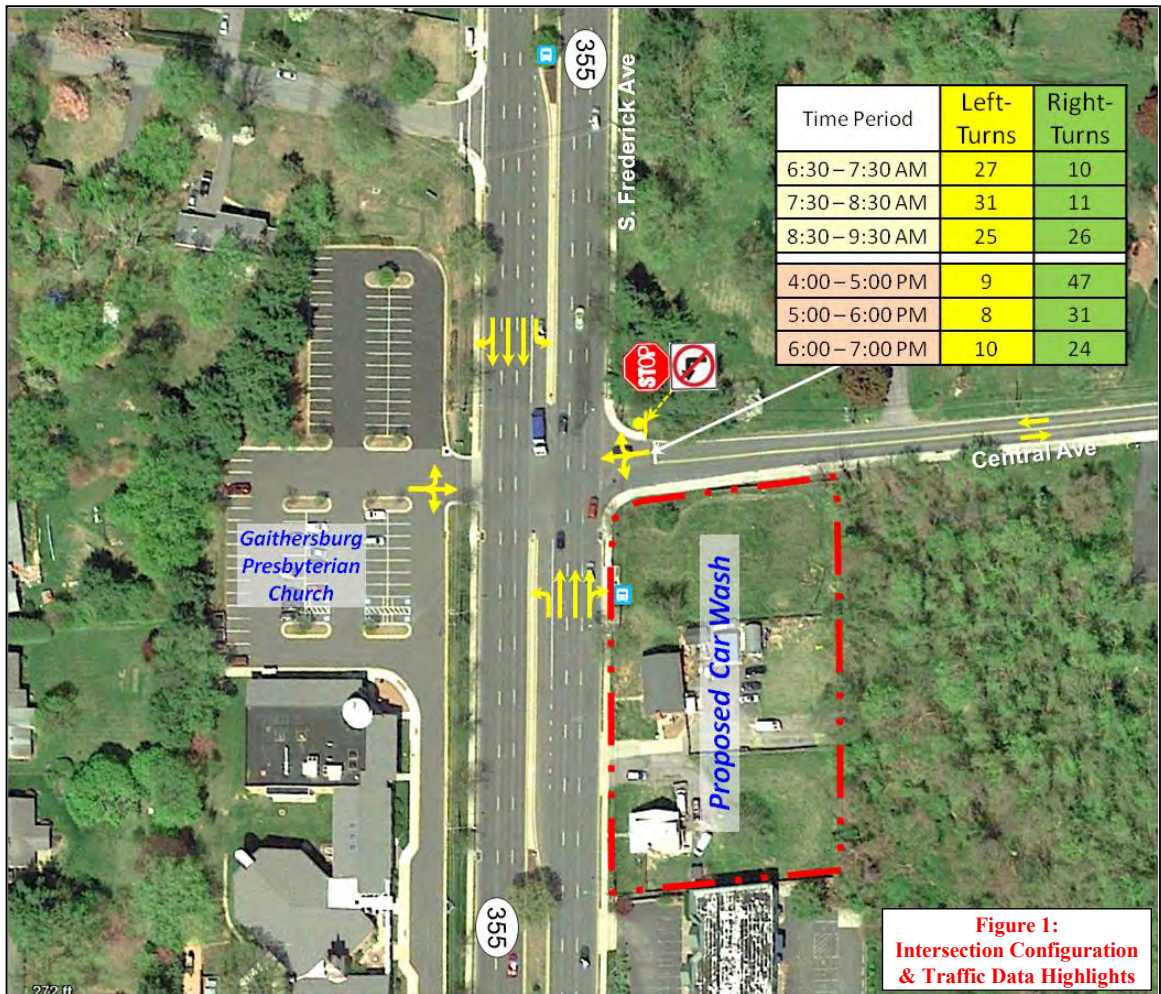
As you requested, we have reviewed Exhibit 113: “*Site Access Evaluation for Whip Clean Gaithersburg*” prepared by Lenhart Traffic Consulting, Inc. The document notes that “at this stage of the development process, a Traffic Impact Analysis is not required.” However, we have reviewed the evaluation with the understanding that the City’s regulations require the Applicant to demonstrate that “...existing and planned public facilities are adequate to service the proposed development” at the Concept Plan stage. [City Code 24-160G.7(5), also cited on page 3 of Preliminary Staff Analysis, March 21, 2022]. From this perspective, we wish to present our assessment of the Consultant’s updated evaluation, specifically as it pertains to the *adequacy of public roadway facilities*.

- a) **Traffic Data and Time Periods Analyzed:** The Lenhart Consultants performed and analyzed traffic counts covering only the periods 6:30 – 9:30 AM and 4:00 – 7:00 PM on two Wednesdays (one in October, 2021 and another in March, 2022). While this data may satisfy the City’s requirements for evaluation at the Preliminary or Site Plan phase, it does not address conditions that can reasonably be expected to occur during periods of peak activity at the proposed car wash.

We believe it is commonly known that the heaviest demand for car wash service occurs after periods of heavy rain or snow, during early spring when heavy pollen accumulation occurs, and more often on Thursdays through Sundays. We also note that it is often essential to evaluate conditions of unusual or non-standard land use types during their site-specific periods of peak demand and not just during the morning and afternoon periods of commuter traffic. ***Our conclusion is that the data and analysis presented does not sufficiently inform the review process for a determination on adequacy of public roadway facilities.***

- b) **Community Access via Central Avenue:** Central Avenue is a County collector roadway, which also serves to connect South Frederick Avenue with the Town of Washington Grove to the east. It is the primary access for approximately 100 single-family homes, the Washington Grove Elementary School, the Rockville Evangelical Mission Church, and an access route to the Washington Grove MARC station. There are speed humps and other signage identifying Central Avenue as serving a traffic calming area. Our preliminary inquiry made to the State Highway Administration (District 3 Office) indicates that the State installed signs prohibiting left-turns from Central Avenue onto South Frederick Avenue. However, the traffic data presented in the Consultant’s evaluation shows the continuing persistent left-turn violations during both the entirety of the periods evaluated.

Figure 1 highlights the data presented in the Consultant’s evaluation, showing that the number of illegal left-turn movements from Central Avenue greatly outnumbers the number of legal right-turn movements during the morning peak period when the conflicting southbound movements along South Frederick Avenue is typically at its highest level. The Applicant’s data at page 9 of Exhibit 113 also shows the overall heavy vehicular movements into and out of Central Avenue during both the morning and afternoon peak periods. Copy of this page is included as Attachment A, and is discussed further under the section dealing with the site access conflicts.



We believe that the situation described above raises significant question regarding the adequacy of this intersection to service the additional traffic that will be generated by the proposed car wash, with its proposed entrance so close to South Frederick Avenue. It is also relevant to note that the Applicant’s submission at page 24 of Exhibit 73 includes data showing that reported crashes at this location had increased three-fold between 2015 and 2019 (i.e., from 3 per year to 10 per year). ***Our assessment is that the level of left-turn violations and the increasing number of crashes at this location are strong indications of the significant access pressures that the adjacent community to the east is experiencing. We believe it can reasonably be concluded that the proposed car wash will exacerbate the existing situation.***

c) **Applicant's Mitigation Proposals:** In order to address the left-turn violations discussed above, the Applicant's Consultant has proposed two (2) geometric improvement alternatives. These are shown on page 7 of Exhibit 113. Our view is that the exhibits do not clearly show what is being proposed, and we have taken the liberty to illustrate the concepts in our Figure 2 below. The purpose of our exhibit is to show the additional impacts that these changes would have on local vehicular movements, particularly in the context of the existing community accessibility constraints that were discussed under Item b above.



Figure 2 on the previous page highlights the likely impacts that the proposed mitigation measures would have on current and future vehicle movements within the local area. It is also relevant to note the following related issues and considerations:

1. Geometric Alternative 1 (indicated as the preferred alternative) would not effectively restrict the left-turn movements because of the relatively wide/open geometry of the intersection.
2. Both alternatives would restrict movement between the residential community to the east and the Gaithersburg Presbyterian Church, particularly during church services and special events such as weddings, funerals, etc.

In addition to the geometric alternatives discussed above, the Applicant has indicated that signalization as a potential mitigation measure. We offer that this is a major and potentially long-term solution, that would fall under the jurisdiction of the State Highway Administration. However, the Applicant has provided no indication that the existing issues and concerns at this intersection have been brought to the attention of the State even on a preliminary basis. Also, the case file has also not indicated that the City has raised these issues and potential solution with the State.

d) **Consultant's Analysis Methodologies:** As in the Applicant's earlier submissions, the traffic consultant uses the Critical Lane Volume methodology to analyze both the car wash entrance and the other intersections considered. While use of this tool is permitted in the City's Traffic Study Guidelines, it is important to note that this methodology is regarded in the "industry" as a planning-level tool only. It is of little value in analyzing situations where dynamic operational issues involving closely-spaced intersections and driveways, slow-moving or queuing vehicles, etc. need to be considered.

The Consultant's analysis does also utilize the Highway Capacity Manual methodology, which is more appropriate where flow within a traffic network situation needs to be evaluated. However, its use in assessing the queuing situation that is likely to occur at this location during periods of high service demand for the car wash is highly doubtful. As an illustration, the Consultant's analysis makes what we believe is the clearly erroneous assumption that vehicles using the full length of the driveway serving the vacuuming operations will move in a free-flowing manner. (In support of this, we draw attention to page 52 of Exhibit 113, a copy of which is included as Attachment B, with clarifying notes.) The matter is further addressed under Item e below.

e) **On-site Circulation/Vacuum Area Congestion Issues:** An important element of the current application is an environmental waiver, which significantly reduces the area of the property available for the footprint of the car wash. As a further consequence, the application is also requesting a waiver that would reduce the width of the drive aisle serving the vacuum operations area from 26 Ft to 21 Ft. This represents a 20% reduction from the City's requirement, and we believe that this waiver must be considered against the background of the following factors:

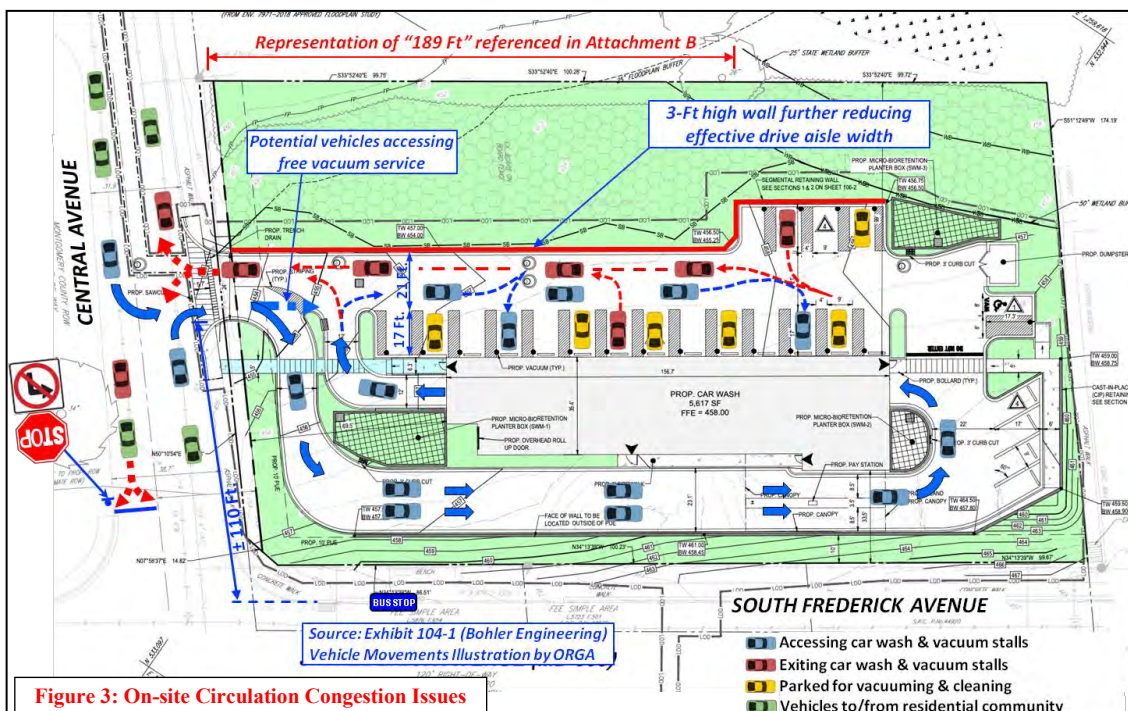
- The City's regulation calls for parking space dimensions of 9 Ft wide X 17 Ft deep for all types of vehicles. However, Montgomery County's regulations call for regular spaces to be 8.5 Ft wide X 18 Ft deep; and compact spaces to be 7.5 Ft wide X 16.5 Ft deep.
- The Federal Highway Administration (FHWA) and other jurisdictions in the region use 9 Ft wide X 18 Ft deep as the standard dimension for parking spaces within a 90° angle configuration, as is the case the current Site Concept Plan.

- The Institute of Transportation Engineers (ITE) in its Transportation and Land Development Planning document recommends 8.5-9.0 Ft wide X 18 Ft deep as the standard for regular spaces in situations where low turnover of parking situations is expected. For high turnover parking situations (such as car washes), ITE recommends 9.5-10.0 Ft wide X 18 Ft deep spaces.

In addition to the above, we wish to cite the following sources which provide useful information regarding *recent trends in vehicle sizes within the US automobile population*, and the potential impact on operational issues within the site that are likely to arise due to both the environmental waiver and the waiver that would require reducing the aisle width.

- 1) The Environmental Protection Agency (EPA) in its EPA Automated Trends Report¹ notes that “the overall new vehicle market continues to move away from sedan/wagon vehicle type towards a combination of truck SUVs and car SUVs.”
- 2) The technical resources section of the ITE website cites policies of the Federal Highway Administration in its “Zero Deaths – Saving Lives through a Safety Culture...” which point to the recent trend toward larger size vehicles².
- 3) Various publications such as “The Center for Auto Safety” (March 11, 2020), “The Atlantic Magazine” (December 29, 2021), and “USA Today” (December 27, 2019) among others report on similar trends. Extracts from these publications are included as Attachment C.

Based on the above background, we utilized the Applicant’s Site Plan (Exhibit 89) as a base to illustrate certain factors regarding the on-site circulation, and we present this in our Figure 3 below. The figure highlights representative vehicular movements within the site during a period of moderate service demand. We also highlight factors pertaining to the impact of the requested waiver for the reduced width of the aisle.




¹ The 2021 EPA Automotive Trends Report – Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975 (November, 2021)
² <https://www.ite.org/technical-resources/topics/safe-systems/>

We believe that the Figure 3 clearly shows that the proposed 3-Ft high vertical wall abutting the drive aisle further reduces the effective aisle width. This is because no maneuvering space is available for the front or rear vehicle overhang that is typically available in most parking lot situations. This reduction in effective width is based on studies, which show that drivers naturally “shy away” from barriers (and other fixed objects) which abut travel lanes. We emphasize that the vertical wall will effectively reduce the width of the drive aisle by another 2 to 3 Ft, reducing the effective width to approximately 18 to 19 Ft. We note this factor because the Applicant cites the 20-Ft minimum aisle width recommended by Montgomery County as justification for the waiver request. (See page 24 of Exhibit 91). *The latter point is also quite relevant since the application also uses the City’s recommended parking stall depth of 17 Ft, which is also less than the 18-Ft minimum required by Montgomery County.*

In summary, we have shown that the Environmental Waiver and the reduced parking aisle width would result in reducing the City’s parking aisle width by an actual 20%±. The further/effective reduction due to the 3-Ft high wall would reduce the effective aisle width to 18 – 19 Ft, an approximate 30% reduction. This is clearly a major consideration and confirms that the constraints of this site itself makes the development of the proposed car wash highly questionable. We also believe that the traffic operational issues cited further weigh against the proposal.

We trust that the above adequately responds to your requirements at this time, and we stand ready to respond to any questions you may have. Thank you!

Respectfully Submitted,
O. R. GEORGE & ASSOCIATES, INC.


Osborne R. George, PE, PTOE, F-I-IE
President

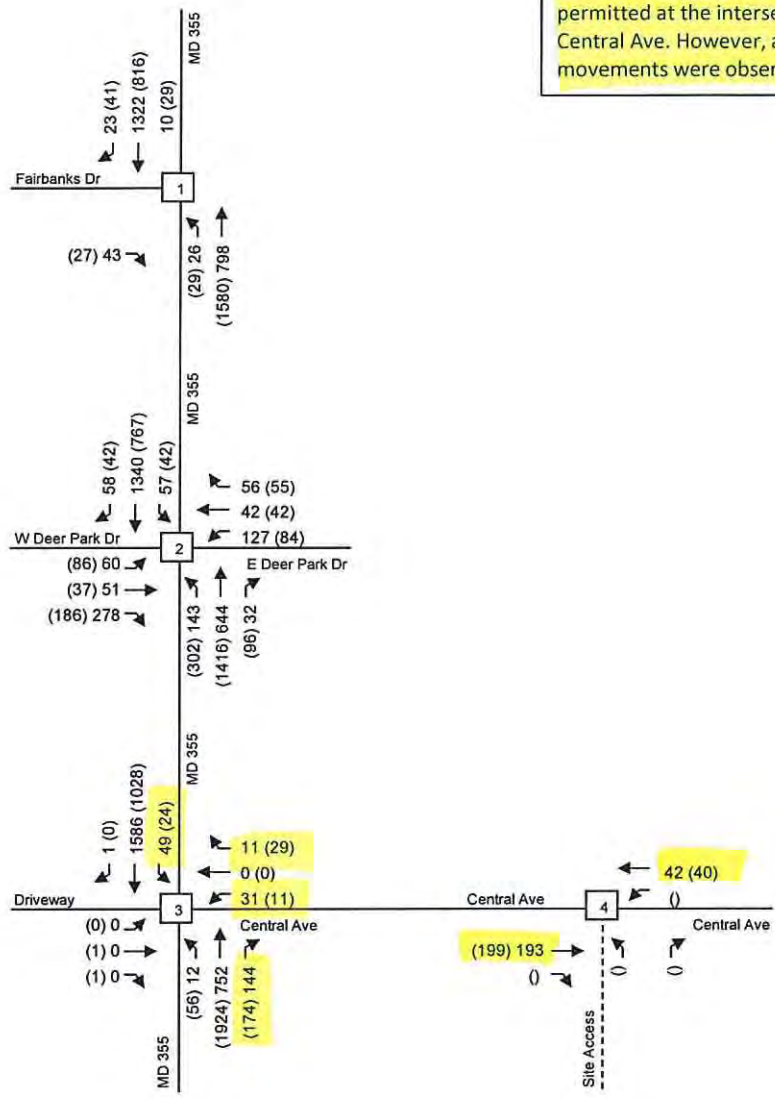


Attachments: As Noted.

ATTACHMENT A:

**Extract from Consultant's traffic data
highlighting critical turning movements**

Note: Westbound left turns are not permitted at the intersection of MD 355 & Central Ave. However, a number of these movements were observed.



Site Access Evaluation	Existing Peak Hour Volumes	Exhibit 3a
Lenhart Traffic Consulting, Inc. Traffic Engineering & Transportation Planning	Key: xx = AM Peak Vol's (xx) = PM Peak Vol's	

**Source: Page 9 of Exhibit #113
(Highlights by O. R. George & Associates)**

ATTACHMENT B:

**Extract from Consultant's evaluation
highlighting assumption for use of full length
of drive aisle**

Intersection: 3: MD 355 & Driveway/Central Ave

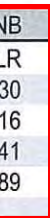
Movement	WB	NB	NB	NB	SB	SB	SB
Directions Served	LTR	L	T	TR	L	T	TR
Maximum Queue (ft)	57	42	4	28	60	10	10
Average Queue (ft)	25	8	0	2	22	0	0
95th Queue (ft)	49	30	3	13	47	7	7
Link Distance (ft)	60		952	952		756	756
Upstream Blk Time (%)	0						
Queuing Penalty (veh)	0						
Storage Bay Dist (ft)		190			220		
Storage Blk Time (%)							
Queuing Penalty (veh)							

Intersection: 4: **Site Access & Central Ave**

Movement	WB	NB
Directions Served	LT	LR
Maximum Queue (ft)	6	30
Average Queue (ft)	0	16
95th Queue (ft)	4	41
Link Distance (ft)	238	189
Upstream Blk Time (%)		
Queuing Penalty (veh)		
Storage Bay Dist (ft)		
Storage Blk Time (%)		
Queuing Penalty (veh)		

Network Summary

Network wide Queuing Penalty: 4



Analysis indicate drive aisle would operate as a 189 Ft approach of a typical intersection with free-flowing traffic.

ATTACHMENT C:

Miscellaneous publications citing current trends toward larger vehicle sizes in US automobile population

IDEAS

Big Cars Are Killing Americans

The government can no longer allow the auto industry to treat walkers and bikers like collateral damage.

By Angie Schmitt



Getty

DECEMBER 29, 2021

SHARE 

About the author: *Angie Schmitt is a Cleveland-based planner and writer. She is the author of Right of Way: Race, Class, and the Silent Epidemic of Pedestrian Deaths in America.*

After a decade of steady increases, the newest Ford F-250—part of Ford’s F-Series of pickups, the No. 1 selling vehicle model in America—measures some 55 inches tall at the hood. That’s “as tall as the roof of some sedans,” a *Consumer Reports* writer remarked in a recent analysis examining the mega-truck trend. This height would easily render someone in a wheelchair, or a child, totally invisible at close range. If I, a tallish woman at 5 foot 6, were hit by a new F-250, I would be struck above the chest. The face, head, neck: These are not great places to suffer a forceful blow—like the kind that an up-to-7,500-pound F-250 can deliver.

Americans have traded sedans for crossovers and SUVs for full-size pickups with total abandon over the past decade. To the extent that we think at all critically about the sheer bulk of the vehicles we drive, we’re usually motivated by environmental concerns. One common notion—though auto-safety experts will say it’s not that simple—is that it’s safer to get around in what’s basically a tank. But those benefits, exaggerated as they may be, are only for people *inside* the vehicle. People *outside*—pedestrians, cyclists, wheelchair users—are in more peril.



Courtesy of Angie Schmitt

European and Japanese regulators have for many years imposed pedestrian-safety standards on automakers, leading to innovations like the active hood (a little airbag-

type of cushioning for a car's hood). American regulators, however, have been slow to think beyond the driver's seat.

This helps explain why passenger and driver deaths have remained mostly stable over the past decade while pedestrian fatalities have risen by about 50 percent. From 2019 to 2020, pedestrian deaths per vehicle miles traveled increased a record 21 percent, for a total of 6,721 fatalities. This astonishing death toll has multiple causes, but the scale of the front end of many pickup trucks and SUVs is part of the problem, and that's been obvious for quite a while.

Read: The pedestrian-death crisis came to my neighborhood

Back in 2002, the *New York Times* writer Keith Bradsher noted in his book, *High and Mighty*, that the auto industry tapped into some “reptilian” impulses for more aggressive vehicles. A marketing savant at Chrysler in the 1990s, who helped launch the SUV trend, liked to compare the road to a “battlefield.” Bradsher quoted him as saying, “My theory is, the reptilian always wins. The reptilian says, ‘If there’s a crash, I want the other guy to die.’ Of course I can’t say that out loud.” He probably meant “the guy in the other car.” What about the guy in the street? In 2003, a study found that SUVs were three times more likely than sedans to kill pedestrians when they struck them. Leg injuries are dreadful, but “serious head and chest injuries can actually kill you,” the injury-biomechanics professor Clay Gabler told the *Detroit Free Press* in 2018.

Without any intervention from regulators, the attempt to appeal to the “reptilian” impulse has only grown. Front ends have morphed into towering brick walls. Consumer Reports notes that the weight and hood height of new pickups have grown by 11 percent and 24 percent, respectively, since 2000. Pickup trucks make up one in five vehicle sales—and the full-size models dominate now in a way that they didn’t in the past. Some of the best-selling pickups and SUVs in America are now bigger than military tanks from World War II, Vice magazine, among others, recently pointed out.

The consequences of the bigger-is-better fad are felt unequally. Black and Indigenous people are disproportionately hit and killed while walking, as are older Americans, people with disabilities, and people who live in low-income neighborhoods. The low

social status of these victims—especially compared with that of wealthier new-car buyers—may help explain why we’ve been willing to ignore auto-industry excesses.

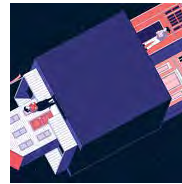
The late consumer advocate Clarence Ditlow called pedestrian protection “one of the last frontiers in vehicle safety,” and added that the industry was reluctant to address it, “because it relates so closely with styling.”

Meanwhile, the hyperaggressive macho-truck trend has been enormously profitable for the auto industry—particularly the Detroit-based Big Three. Profits are as high as \$17,000 on a Chevy Silverado. Crossover SUVs sell at a \$10–\$15,000 markup over the sedans they were based on, according to *Automotive News*, even though they cost a similar amount to make.

Janette Sadik-Khan and Seth Solomonow: Surrendering our cities to cars would be a historic blunder

Hidden within the Biden administration’s \$1.2 trillion infrastructure bill is the U.S.’s first real attempt to address the regulatory shortfall. The bill requires that our five-star vehicle-safety-rating system—the New Car Assessment Program—be overhauled and that ratings be added for pedestrian impacts. (When the Obama administration proposed this change in 2015, some American automakers, such as General Motors, protested, and the Trump administration scuttled the whole thing.) Even better, the infrastructure bill calls for regulators at the U.S. Department of Transportation to develop standards for bumpers and hoods aimed at reducing injuries to pedestrians and cyclists. The agency will have two years to develop the standards and present them to Congress.

RECOMMENDED READING



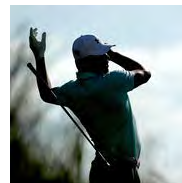
Dear Therapist: My Daughter Doesn’t Care That I Want Her to Live Closer to Home

LORI GOTTLIEB



A Kidnapping Gone Very Wrong

BRENDAN I. KOERNER




The Average Guy Who Spent 6,003 Hours Trying to Be a Professional Golfer

STEPHEN PHILLIPS

These changes have the potential to save a lot of lives—but they will take time. According to IHS Markit, the average age of an American car on the road is 12.2 years, a new high and up from 9.6 years in 2002. That means that a fully turned-over safer-vehicle fleet is more than a decade away, and we can expect pedestrian deaths to remain sickeningly high.

Over the long term, we have to shift our focus from blaming individuals when they are struck by cars—“Did you look both ways?”—to addressing the systemic factors that put them at risk. The government can no longer allow the auto industry to treat walkers and bikers like collateral damage.

Angie Schmitt is a Cleveland-based planner and writer. She is the author of *Right of Way: Race, Class, and the Silent Epidemic of Pedestrian Deaths in America*.

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CARS

Why SUVs are getting bigger and bigger: GM, Toyota, Ford enlarge hefty vehicles



Nathan Bomey
USA TODAY

Published 12:01 a.m. ET Dec. 27, 2019 | Updated 12:26 p.m. ET Dec. 30, 2019

Just when you thought sport-utility vehicles couldn't get any bigger, they are.

Two of the auto industry's most hulking SUVs, the Chevrolet Tahoe and Chevrolet Suburban, are growing in size for the 2021 model year.

For customers, that means more headroom, more legroom and more space to haul stuff.

For automakers, that means more profits because large SUVs are among the industry's biggest moneymakers, rivaled only by full-size pickups, which are also getting bigger.

Other SUVs, like the Toyota Highlander and the Ford Expedition, have been getting longer and larger, too.

"Size creep," is how Stephanie Brinley, principle automotive analyst at research firm IHS Markit, describes it.

"When you go out and do clinics on almost any vehicle and you ask what people want, they almost always say they want more space," Brinley says.

The trend comes as the nation's SUV boom continues. Steadily low gasoline prices are providing Americans with confidence that they won't get stuck with gas guzzlers during a sudden spike in fuel prices.



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Stores on thin ice: These retailers are facing the fight for their lives in 2020

No pain at the pump

The national average price of gas hasn't topped \$3 since 2014, according to the U.S. Energy Information Administration. That reality, coupled with the rock-bottom unemployment rate and record stock prices, has benefited SUV sales.

It also doesn't hurt that SUV gas mileage has improved across the board.

Among all SUVs, 28 vehicles in the 2020 model year get at least 30 miles per gallon in combined city-highway driving, compared with only one model in 2000, according to the Environmental Protection Agency.

“With low gas prices, nobody cares how big they are really, and the fuel economy has improved, too,” says Michelle Krebs, executive analyst at car-buying site Autotrader.

Another factor driving the trend: Americans are getting older, and SUVs are generally easier to climb into than low-riding passenger cars, analysts say.

That's one reason why GM, Ford and Fiat Chrysler have discontinued most of their passenger cars, such as the Chevrolet Cruze, Ford Focus and Chrysler 200, while sales of other cars that were once stalwarts have plummeted.

When 2019 is over, about half of new-vehicle sales in the U.S. will have been SUVs, according to projections by car-research site Edmunds. Passenger cars will represent about one-third of those sales, while pickups should comprise the rest.

To capitalize on the boom, automakers have also been introducing more SUV models, including three-row options from Subaru, Hyundai, Kia and Volkswagen for the first time.

Ford owner blames automaker for debt: He had to drive a defective Focus

Oh, Christmas tree: Can you guess what happens to unsold evergreens?

Tahoe grows 18 inches

To keep customers buying its big SUVs, GM announced earlier this month that it had stretched out the Tahoe and Suburban SUVs. The 2021 Tahoe is 6.7 inches longer than the 2020 model, which is a huge leap in an industry in which 1 or 2 inches can make a significant visual difference. And its wheelbase adds 4.9 inches.

That extra size has increased the vehicle's maximum cargo room by 29.8%.

It's the latest in a series of increases. From the 1999 model to the 2021 model, GM added 17.7 inches in length to the Tahoe.

Ford has added 11 inches to the length of its Tahoe rival, the Ford Expedition SUV, since 1999, according to Edmunds.

There are dollar signs behind the increases.

The average full-size SUV sold for \$67,681 from June through November, compared with \$36,856 for the average full-size car, according to Cox Automotive, which owns Kelley Blue Book and Autotrader. The average midsize SUV sold for \$39,278 during the same period, compared with \$26,244 for the average midsize car.

“As the competitors grow in size, they want to make sure they protect this cash cow that they've got here,” Edmunds analyst Jessica Caldwell said of GM.

A bigger midsize

The size race is not limited to the traditional Detroit Three automakers.

When Japanese automaker Toyota revealed its redesigned 2020 Toyota Highlander at the New York Auto Show this year, it crowed about the extra size in its bigger SUV. The Highlander has added 10.9 inches in length since its debut in 2001, including adding a third row.

At 194.9 inches, the 2020 Highlander is longer than the 193-inch 1999 Chevy Tahoe.

And it's not just the industry's biggest SUVs adding size. The most popular SUV in the country – the Toyota RAV4 midsize SUV – has added 14 inches to its wheelbase from 1999 to 2019.

“People are willing to pay more for bigger vehicles,” Caldwell said.

Follow USA TODAY reporter Nathan Bomey on Twitter @NathanBomey.



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As the world burns, Americans buy bigger cars



The Center for Auto Safety is the nation's premier independent, member driven, non-profit consumer advocacy organization dedicated to improving vehicle safety, quality, and fuel economy on behalf of all drivers, passengers, and pedestrians.

Jason Levine, executive director of the Center for Auto Safety, stresses that it's misleading to assume SUVs are safer than sedans: "There is a perception that simply because something is bigger it is safer. The data doesn't actually back that up on a class level." SUVs are no longer as prone to fatal rollovers thanks to electronic stability control, but their high center of gravity can still make them less stable.

"When a pedestrian is hit by a moving vehicle, the taller that vehicle is, the more dangerous it is," says Levine. "All other things being equal, the taller the vehicle, the harder it is for the driver to be able to see pedestrians and to stop themselves from hitting pedestrians, and that is a problem that you see day after day."

By Marina Bolotnikova

Mar 11, 2020

As a kid, I was furious about SUVs with a passion that now seems embarrassing, telling all the suburban adults I knew that their ugly, gas-guzzling tanks were going to end life on Earth. I didn't come up with this idea myself: Anti-SUV discourse was everywhere. Mainstream organizations like the Sierra Club — which famously renamed the huge Ford Excursion "Ford Valdez" after the catastrophic Exxon Valdez oil spill — helped create a cultural backlash against these hulking cars. A TV ad campaign run by the Evangelical Environmental Network — "What Would Jesus Drive?" — urged Midwesterners to rethink their addiction to big cars. *New York Times* reporter Keith Bradsher's 2002 polemic *High and Mighty* sneered at the rise of "behemoths that guzzle gas, spew pollution, and endanger their occupants and other motorists."

Twenty years on, international alarm about climate change may be higher than ever, but the SUVs have won. The crossover, a generally smaller, more modern kind of SUV, has exploded in popularity since the Great Recession. Their better gas mileage compared to earlier SUVs combined with car industry greenwashing and the widely held perception that big cars are safer — even as they've made the streets more dangerous for pedestrians — have helped make crossovers America's biggest car segment, displacing sedans as the default choice for many drivers.

Also known as crossover utility vehicles or CUVs, crossovers were barely on the scene at the turn of the century, but they now make up more than 40 percent of the American market for new cars. Sedan sales have plummeted over the same period: Where passenger cars represented half of car sales just a decade ago, according to a *Wall Street Journal* analysis, they fell to less than a third by the end of 2018. At the end of 2019, while Australia was ablaze, Honda closed its best year ever for its CR-V crossover, now its top-selling car in the US.

“Car companies kind of neutralized the critique of SUVs when they introduced crossovers,” says Angie Schmitt, a former reporter for transit publication *Streetsblog* who is writing a book about the pedestrian safety crisis. “I think crossovers are definitely not as bad as full-size SUVs, and people get that. A lot of people who would never buy a full-size SUV have bought these crossovers, otherwise they’d probably be in sedans.”

Read the full story from [Vox](#).

[← Self-Driving Bill’s Path to Passage Hits a Familiar Obstacle: Forced Arbitration](#)

[Center for Auto Safety Response to FCC comment request on Docket No. 19-138 →](#)



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