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January 18, 2005

Mr. Michael Ma
Supervisor, Site Plan and Project Plan Review
Development Review Division
Montgomery County Park and Planning Department
Montgomery County Planning Board, M-NCPPC
8787 Georgia Avenue
Silver Spring, MD 20910

Re: Site Plan 8-05003 (Westfield Shoppingtown Montgomery, the "Center")
Preliminary Plan 1-05018

Dear Michael:

On behalf of Westfield Corporation, Inc. (Westfield), the Applicant for the subdivision and site plan approvals referenced above for the expansion and redevelopment of the Center, we are writing to summarize its request for a parking waiver. As you know, this matter has been discussed in depth among the Transportation Planning staff of the Planning Board and employees of the Department of Public Works and Transportation (DPW&T).

The Applicant's justification for the reduction in the required parking ratio to 4.5 spaces per each thousand square feet of gross leaseable area (GLA) has two primary bases: first, industry standards for large regional shopping standards now reflect the 4.5/1000 GLA ratio; and second, actual usage of parking at this Center demonstrates that 4.5 spaces per 1000 square feet of GLA is adequate.

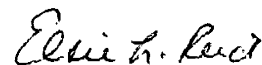
Westfield's consultant, The Traffic Group, submitted a Final Report dated November 23, 2004, in support of the parking waiver; this Final Report references the Urban Land Institute studies which recommend the lower ratio of 4.5 and provides the expert's analysis based on parking counts conducted at the Center over the 2004 summer, adjusted for the busier shopping

days of December. Other super regional malls in the Washington area also park at a ratio of 4.5/1000 feet of GLA or lower, including the Shoppingtown at Wheaton (4.5) and the soon to be enlarged Tyson's Corner (4.21). In addition, actual parking counts, conducted at the Center during the recent peak holiday shopping season (the two days after Thanksgiving and on early December weekends) by both The Traffic Group and the Applicant's own personnel, submitted to you in mid-December, substantiate the fact that the provision of 4.5 spaces per each thousand feet of GLA is a sufficient number of spaces to serve the Center's customers. At the busiest parking hours, the usage ratio was no more than 4.47/1000. A copy of these two data sets is also attached here, as well as the Parking Comparison prepared by The Traffic Group.

Specifically, the Applicant requests that the reduction in required parking be approved by authorizing the use of a parking ratio of 4.5 spaces/1000 square feet of GLA. As the actual gross leaseable area of the Center will vary depending on final design and leasing decisions, the exact number of spaces is difficult to prescribe at this time. The ratio currently in effect at the Center is 5.0 spaces/1000 feet of GLA.

Westfield intends to continue its annual agreements with Marriott International, Inc., for offsite parking of its employees during the peak or high shopping days of the year in accordance with longstanding agreements with DPS. Westfield provides shuttle service for Center employees and other incentives to promote this offsite parking during the busier shopping days of the year. A copy of the most recent Marriott agreement is attached for your reference.

Sincerely,



Elsie L. Reid



Devin John Doolan

ELR/jmt

Enclosures:

- 1) Parking Occupancy Study by The Traffic Group
- 2) Parking Survey by Westfield
- 3) Marriott Offsite Parking Agreement
- 4) Parking Comparison by The Traffic Group

Westfield Shoppingtown Parking Comparison

CENTER	Area	Parking Spaces	Ratio
Annapolis/MD	1,178,355	4613	4.00
Chesterfield/MO	1,318,299	5976	4.50
Crestwood/MO	1,028,410	4410	4.30
Mid Rivers/MO	1,061,811	5253	4.95
South County/MO	1,028,474	4758	4.65
West County/MO	1,217,579	5551	4.50
Wheaton/MD (Existing)	1,101,623	5649	5.13
Wheaton/MD (Redo)	1,440,244	6511	4.15

*Crown 11 Screen Theaters

*AMC Theaters Opening Spring 2005

*AMC 11 Theaters Opening Spring 2005

*Wierenburg 14 Screen Theaters

NA

N/A

*Lowes 11 Screen Theaters

*Lowes 11 Screen Theaters

Tyson's (Existing)	1,921,242	9489	4.94
Tyson's (Redo)	2,444,648	10289	4.21

NA

*AMC 16 Screen Theaters Opening Spring 2005

Lake Forest	1,085,000	5700	5.25
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N/A

Program of Requirements for Montgomery Mall Transit Center:

Off-street bus bays, comprised of six 65-foot bays in a saw tooth configuration to accommodate 40-ft buses and allow for independent ingress and egress of each bus. Access to the transit center will be from the eastern signalized entrance at Westlake Terrace, and the ring road; exit for eastbound buses will be via a bus ramp directly to Westlake Terrace (right exit only). The bus ramp to Westlake Terrace will not exceed a 5 percent slope. Two of the saw tooth configurations will need to accommodate 60-foot articulated buses. Two bus layover locations will also be provided. Height of any structures extending over bus movement areas will be a minimum of 16 feet vertical clearance. Layout of the transit center is included in Attachment A. All pavement for the bus movement areas of the transit center and the exit ramp, as well as drive entrances, will be of specifications sufficient for bus traffic; standard pavement specifications for buses are included with Attachment A.

Bays to be configured around a central passenger waiting area, with canopy structure covering passenger waiting areas. Structures should be configured with canopy covering bus loading area as well as passenger waiting areas. Passenger waiting area under canopy will be weather/wind protected, have seating, and be lit and equipped with radiant space heaters. Facility design to be visually open to minimize “hidden” areas, with waiting areas to be visible in multiple directions. Facility will be constructed with provisions for two pay telephones as well as two emergency call boxes/phones - - emergency call phones to be located at either end of the central passenger waiting area, to be connected to transit security or police.

Two transit information kiosks to be located at the passenger waiting area of the bus bays, at least two sides of each kiosk to hold transit information. Transit information display panels will be consistent in size with those now being designed for other Montgomery County bus stops. Kiosks may be 3 or 4 sided.

Safe, convenient, passenger/pedestrian access to both the mall entrance and Westlake Terrace, with sidewalks and crosswalks at service roads and parking structures. Pedestrian pathways should be configured so as to minimize conflicts with traffic. Westfield will attempt to design stair access from the walkways leading from the transit center to the lower parking area in parking structure B. The configuration of pedestrian pathways is included in Attachment B.

Turning radius (50 feet) to accommodate 40-ft. buses and 60-ft. articulated buses.

Entire transit center area to be well lit with ambient lighting and with activity area lighting at passenger waiting areas.

Provisions for the future installation of real time sign information including necessary electrical and cable conduit, with provisions for variable message boards to be mounted in the canopied passenger waiting areas, and at a comfortable waiting areas inside the mall, next to the customer service desk and possibly in the food court/boulevard areas.

Transit Store/Sales Kiosk inside mall, adjacent to the Westfield Customer Service Desk, comprised of dedicated display area with counters to provide ride guides, Ride On and Metro route and schedule information, transit pass sales, car-sharing information, and phone for requesting taxi service. Transit Store/Sales Kiosk will be provided with an internet connection to enable customers to access web-based transit information, and directly access the Ride On website. Transit Store/Sales Kiosk will be maintained by County-provided personnel. When staffed, kiosk will be staffed by the County during selected hours and self-serve at other times, with Westfield's Customer Service Desk staff being able to direct customers to appropriate transit information requested by passengers.

Bike racks (four 4-rung units), to be weather protected as feasible or under cover of parking garage roof, located in proximity to mall entrance and transit center. Location of bike racks will be coordinated with the MNCPPC Bicycle Coordinator, in association with other bicycle facilities being included in mall redevelopment.

Taxi stand for 3 cabs, located in proximity to the Transit Center

All facilities and walkways are to comply with ADA guidelines, and be handicapped accessible.

Passengers and transit operators will have access to restrooms in the mall.

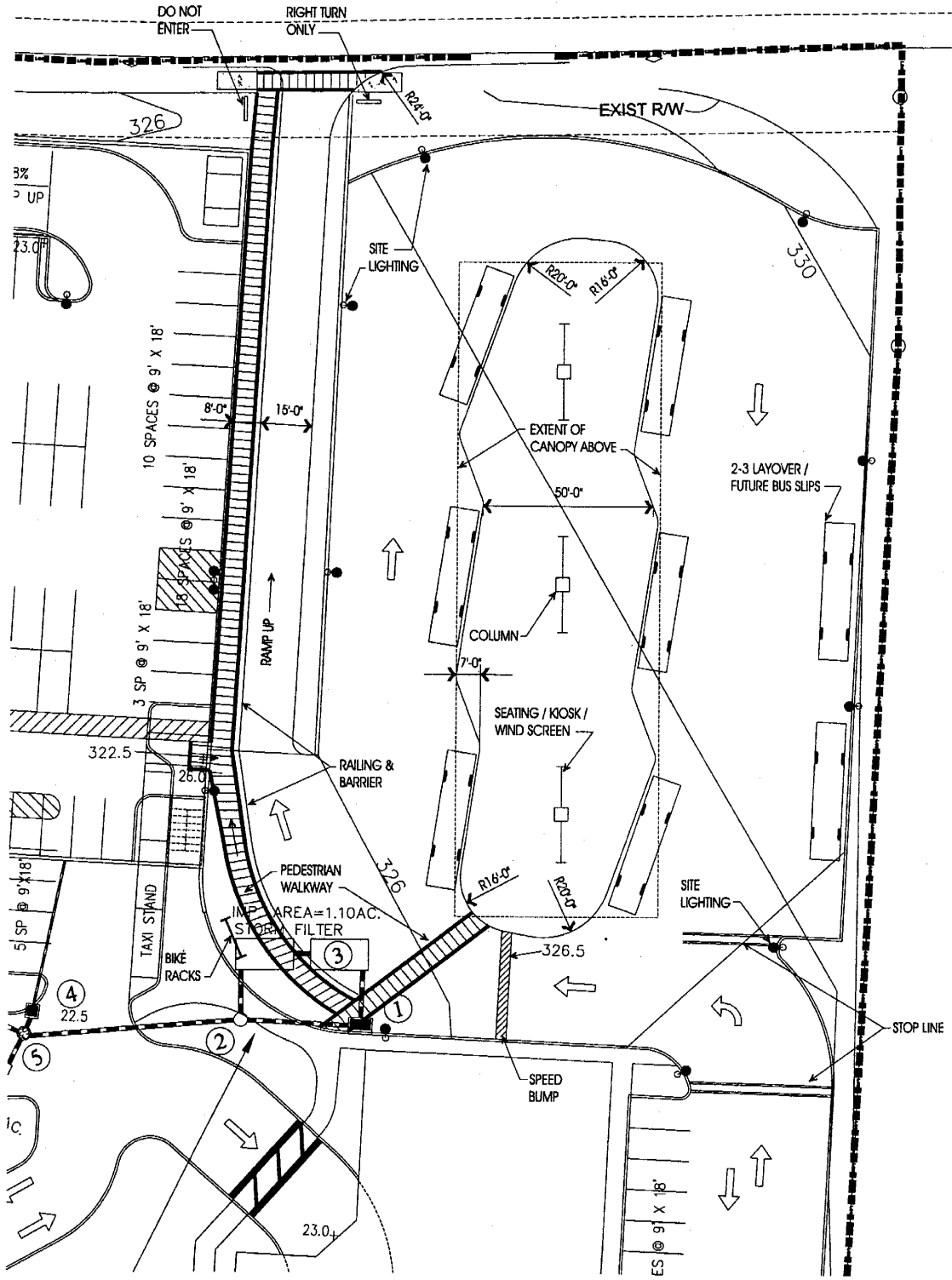
Provisions, with appropriate signage, will be made for the number of commuter parking spaces in the previous agreement; designated spaces will be located in parking structure B, with commuter parking allowed weekdays, from 5:00 am to 7:00 pm.

Provisions for future installation of closed circuit security cameras, to be monitored by the County or transit authority, will be provided in the central passenger waiting area.

A conceptual plan for a commuter parking area along the east side of the bus bay area, separated from bus circulation area, to accommodate 50 automobiles, will be prepared by Westfield for the County to submit to the Maryland State Highway Administration (SHA), for the purpose of the County seeking easements from SHA for I 270 encroachment for future construction of the commuter parking lot. Should the State provide such easement, the County will seek funds from sources other than Westfield as provided under this site plan approval, for the purpose of constructing the commuter parking area.

It is understood that the new transit center will be constructed on the northeast corner of the property under the first phase of mall reconstruction, to be built during construction

of Sears new building and the New Parking Structure "B." Upon completion of the new transit center, bus service at the existing transit center will be relocated to the new transit center.



January 14th, 2005



Sheet 1 (Revised)