



## Memorandum

*By Electronic Mail*

**To:** Atul Sharma

**From:** Patricia Harris

**Date:** May 13, 2019

**Re:** Rock Spring Urban Design Guidelines  
Comments on behalf of Erickson at Rock Spring – 10400 Fernwood Road

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### **Introduction**

Erickson Living, the owners of 10400 Fernwood Road (the existing Marriott Headquarters site) (“The Property”) plans to redevelop the site with a continuing care retirement community (“CCRC”) upon Marriott’s relocation to downtown Bethesda.

Since December 2017, the Erickson development team has had numerous meetings with M-NCPPC Staff to review Erickson’s development program and plan, including several recent meetings to review the draft Rock Spring Design Guidelines, with the objective of ensuring that the Guidelines support the redevelopment of the Property to accommodate the CCRC.

The Design Guidelines are helpful in furthering the vision of the Rock Spring Sector Plan and we are appreciative of Staff’s efforts. In particular, the Human-Scale Design section provides useful guidelines and examples to ensure quality building design.

Comments and recommended revisions to particular provisions of the draft Design Guidelines are provided below and a redline of specific changes to several pages of the Design Guidelines are attached.

### **Guidelines Flexibility**

#### **Provision:**

*These are not rigid requirements... Design proposals and alternative solutions will be evaluated during the development review process based on surrounding context, site conditions, and how the project addresses the applicable Sector Plan goals and the intent of the Design Guidelines.*  
(p.2)

**Comment:**

We appreciate the recognition that there is flexibility in the application of the Design Guidelines. The development program of certain uses, such as a CCRC, are driven by specific programmatic considerations, unique to a particular use. In the case of a CCRC, there are two driving considerations given the age of the population: 1. the distances between the residential living units and the amenities (dining, medical and social) and 2. the security of the residents. These two factors influence the design, scale, and footprint of the buildings and necessitate larger, not smaller, building areas (blocks).

**Recommended Revision:**

*These are not rigid requirements... Design proposals and alternative solutions will be evaluated during the development review process based on surrounding context, site conditions, programmatic considerations of a particular use and how the project addresses the applicable Sector Plan goals and the intent of the Design Guidelines. (p.2)*

**Fernwood Road - Emphasis on Pedestrian Friendly Right-of-Way****Provisions:**

*Consider placing retail and other activating uses such as entrance lobbies at building corners. (p. 24)*

*Create a pedestrian friendly frontage along Fernwood Road with buildings opening directly on to the street with active uses. (p. 58)*

**Comments:**

The Erickson development team agrees with the overall objective of activating Fernwood Road in a pedestrian friendly manner and designing it as a central spine through Rock Spring, but there needs to be a creative as well as realistic approach in regard to achieving a pedestrian friendly environment.

The Rock Spring Sector Plan is anchored by major retail on either end. There is more than 1 million square feet of retail space at Westfield Montgomery Mall on the western edge of the Sector Plan area and more than 200,000 square feet on the eastern edge at Georgetown Square and Wildwood Shopping Center.

The retail market is very competitive and attracting and retaining ground floor retail, especially in off-market areas, has become increasingly difficult. If it is determined that a limited amount of neighbored serving retail is viable, Erickson will evaluate the feasibility of incorporating this on the site to further this provision.

## **Recommended Revisions:**

*Consider placing retail, when feasible, and other activating uses such as entrance lobbies at prominent/visible locations ~~building corners~~. (p. 24)*

*Create a pedestrian friendly frontage along Fernwood Road with buildings opening directly on to the street with active uses, when programmatically feasible. (p. 58)*

## **Civic Green**

### **Provisions:**

*Figure 3.19, 3.20, and 3.21 (pp. 57, 58 and 59)*

- *Designation for Recommended Park or Open Space*
- *Note: Diagrams are for illustrative purposes only. Actual site and building design will be evaluated during the regulatory review process*

*Figure 3.21 (p. 59)*

- *Civic Green along the central spine and across from the future Bus Rapid Transit Station*
- *Mid-block connection links civic green to existing open space.*

### **Comments:**

We recommend that Staff reconsider the nature and character of the Civic Greens. The Design Guidelines recommend three Civic Greens in the Rock Spring Sector Plan area. Generally in an even larger urban area, there would be one, or at most two, of these type of spaces, in order that the space that is provided may be meaningfully activated. When there are too many similarly designed spaces, they tend to cannibalize or weaken each other. Notably, the examples cited in the Design Guidelines are examples of one of a kind spaces in the given community or city. We are concerned that it will be hard to have three highly activated Civic Greens in such close proximity to each other and thus recommend that there should be more flexibility in the type, character and size of the open spaces provided.

With that said, the provision of open space (whether a Civic Green or otherwise) of meaningful size in a visible and accessible location along Fernwood Road is recognized by all, including Erickson, as an important component of the Sector Plan. The precise location of the Civic Green, whether toward the eastern side of the Property as recommended in the Sector Plan or further to the west as currently shown in the draft Design Guidelines, should not be specified in the Design Guidelines. Instead, the final location of the Civic Green should be determined in connection with the ultimate plan for the CCRC where the following factors will play a critical role: 1. The operational components of the CCRC; 2. The footprints of the buildings and thus the corresponding blocks (which is driven primarily by operational considerations); 3. The development phasing of the project; and 4. The desire to tie the Civic Green directly to the linear stream valley park to increase the functionality and accessibility of the linear park.

We appreciate the “Note” added to Figures 3.19, 3.20 and 3.21 and other Figures throughout the Design Guidelines stating that the Figures are intended for illustrative purposes only as it relates to site and building design. It is important to specify that the placement of the open spaces is also illustrative. The ultimate location of open space will be dictated by numerous factors. As noted above, in the case of a CCRC, the program ultimately drives the design, and the location of a sizable amount of open space, such as is required on the Property, can greatly influence the layout of the project.

The Design Guidelines recommend that the Civic Green be located along the central spine and across from the future Bus Rapid Transit Station. It is appropriate that the Civic Green be located along Fernwood Road to ensure that it is highly visible and easily accessible. There does not appear to be a strong basis for locating the Civic Green directly across from the Bus Rapid Transit Station (“BRT”) and perhaps most critically, the location of the BRT Station has not yet been determined and likely will not be prior to the Property being developed and certainly not prior to the adoption of the Design Guidelines. Moreover, any crossing between the north side of the street and the south side of the street should only occur at the intersections; mid-block street crossings, especially given the senior population, should be highly discouraged.

The on-site mid-block connection between the Civic Green (in its currently proposed condition), and the existing stream valley park, occupies too much space and creates smaller building envelopes that do not support the Erickson CCRC programmatic requirements. Erickson recognizes that the existing stream valley park along the eastern Property line is an asset to the community and locating the Civic Green at the terminus of the stream valley park will capitalize on the existing park, promote its use, and provide a seamless connection from the Civic Green to the stream valley park. While the Civic Green and existing park will be available to the public, and the public use encouraged and promoted, it is not necessary for the public to traverse through the middle of the CCRC to access this stream valley park (irrespective of the ultimate location of the Civic Green).

### **Recommended Revisions:**

*Figure 3.19, 3.20, and 3.21 (pp. 57, 58 and 59)*

- *Designation for Recommended Park or Open Space*
- *Note: Diagrams are for illustrative purposes only. Actual site and building design and locations of open spaces will be evaluated during the regulatory review process*

*Figure 3.21 (p. 59)*

- *Civic Green along the central spine ~~and across from~~ proximate to the future Bus Rapid Transit Station*
- *~~Mid-block connection links civic green to existing open space.~~*

### **Smaller Blocks, Mid-block connections**



**Provisions:**

*All infill and rebuild scenarios should break up the large property into smaller, more walkable blocks (p. 58)*

*New Streets creates smaller block sizes (p. 59)*

**Comments:**

While Erickson recognizes the overall objectives of creating smaller blocks and internal connectivity, developing housing for a senior population presents a different set of priorities, with residents' safety (and sense of safety) being of primary concern.

Given the Property's location, there is no basis for the Property to provide connections to other streets; the site is an enclave located at the southern terminus of Rockledge Drive and Rock Spring Drive and the CCRC use will generate relatively little traffic. The overall Erickson program and design is intended to de-emphasize vehicular use. While the Property can be designed to visually provide a sense of connectivity, from an operational standpoint this connectivity is not needed and it is recommended that it be limited. In addition, the vehicular drives provided within the Property to accommodate the CCRC are not intended to be public roads. As noted, an important component of the CCRC is assuring residents' safety and it is Erickson's desire to discourage, not encourage, unnecessary vehicular travel through the Property.

Smaller blocks also make it more challenging to achieve site and building design efficiency. As a result, smaller blocks, and thus design inefficiency, unnecessarily increase the cost of development. Unlike a typical multi-family residential development, Erickson's goal is to provide quality, affordable healthcare as well as quality housing, and thus, unnecessary costs impose an additional burden.

In an effort to respond to MNCPPC staff's desire for a streetscape with smaller blocks, Erickson's proposed plan breaks up the facades along Fernwood Road into smaller sections. This creates an urban design presence of smaller blocks, while balancing the design efficiency requirements and security needs of the senior population.

**Recommended Revisions:**

~~*All infill and rebuild scenarios should break up the large property into smaller, more walkable blocks (p. 58)*~~

~~*New Streets creates smaller block sizes (p. 59)*~~

Attachment

cc: Steve Montgomery  
Scott Templin

# 1.1 How to Use the Guidelines

## Purpose

One of the main goals of the Rock Spring and White Flint 2 Sector Plans (Plans) is to promote the transformation of auto-oriented, single use areas into vibrant, mixed use places served by a variety of transportation alternatives. Design guidelines illustrate appropriate relationships between buildings and the pedestrian realm, to ensure that walking, biking and transit are incorporated into the design of streets and to minimize impacts from redevelopment to surrounding lower-scale residential neighborhoods.

New development will enhance the quality of life for existing and future residents and workers in the area. These guidelines will provide clarity and certainty for stakeholders by illustrating how key properties within the two Plan areas may develop over time.

## Applicability

This document should be used in conjunction with the Plan recommendations to guide development projects and improvements to the public domain in the two Plan areas. Standard Method and Optional Method projects under Site Plan review should substantially conform with the Sector Plans and Design Guidelines.

## Guidelines Flexibility

Design guidelines provide a range of strategies to appropriately meet the intent of the Plans' recommendations. These are not rigid requirements, are provided to offer predictability for applicants about what will be expected during development review, and to provide planning staff and the Planning Board with a framework to guide the review process. Design proposals and alternative solutions will be evaluated during the development review process based on the surrounding context, site conditions, [programmatic considerations of a particular use](#) and how the project addresses applicable Sector Plan goals and the intent of the Design Guidelines.

## Design Excellence

Design Excellence is a county wide effort to create and enhance attractive, safe and sustainable places to live, work and play. The two Plan areas are experiencing considerable growth and complex projects with architectural significance are being developed within their boundaries. Developers within the two Plan areas are strongly encouraged to go through the Concept Plan process and have an early meeting with Planning staff.

In 2017, the Montgomery County Planning Department created a Design Advisory Panel (DAP) to review and provide direction to the Planning Director and staff on Bethesda development applications submitted to the Planning Department. The goals of the DAP are to ensure the highest quality design for the planned and built environment, assist in resolving issues that arise in the regulatory process where urban design principles conflict with other county regulations by providing review and discussion earlier in the process, and prioritize the allocation of the CR public benefit points in the CR Guidelines and the applicable Plan.

Given the scale of development projects within the two Plan areas, it may be beneficial for projects

## Corner Treatments

**Goal: Anchor street intersections with a continuous building wall and unique design features.**

- Provide signature design elements on prominent corners or intersections. Prominent locations include sites adjacent to open spaces and sites that terminate view corridors within the two Plan areas.
- The full height of tall buildings may be expressed at corners as a way to provide emphasis and variation along the building's facades.
- Consider placing retail, when feasible, and other activating uses such as entrance lobbies at prominent/visible locations.  
building corners



*Corner expressed through tower element with unique geometry*



*Full height of tower expressed at key corner*

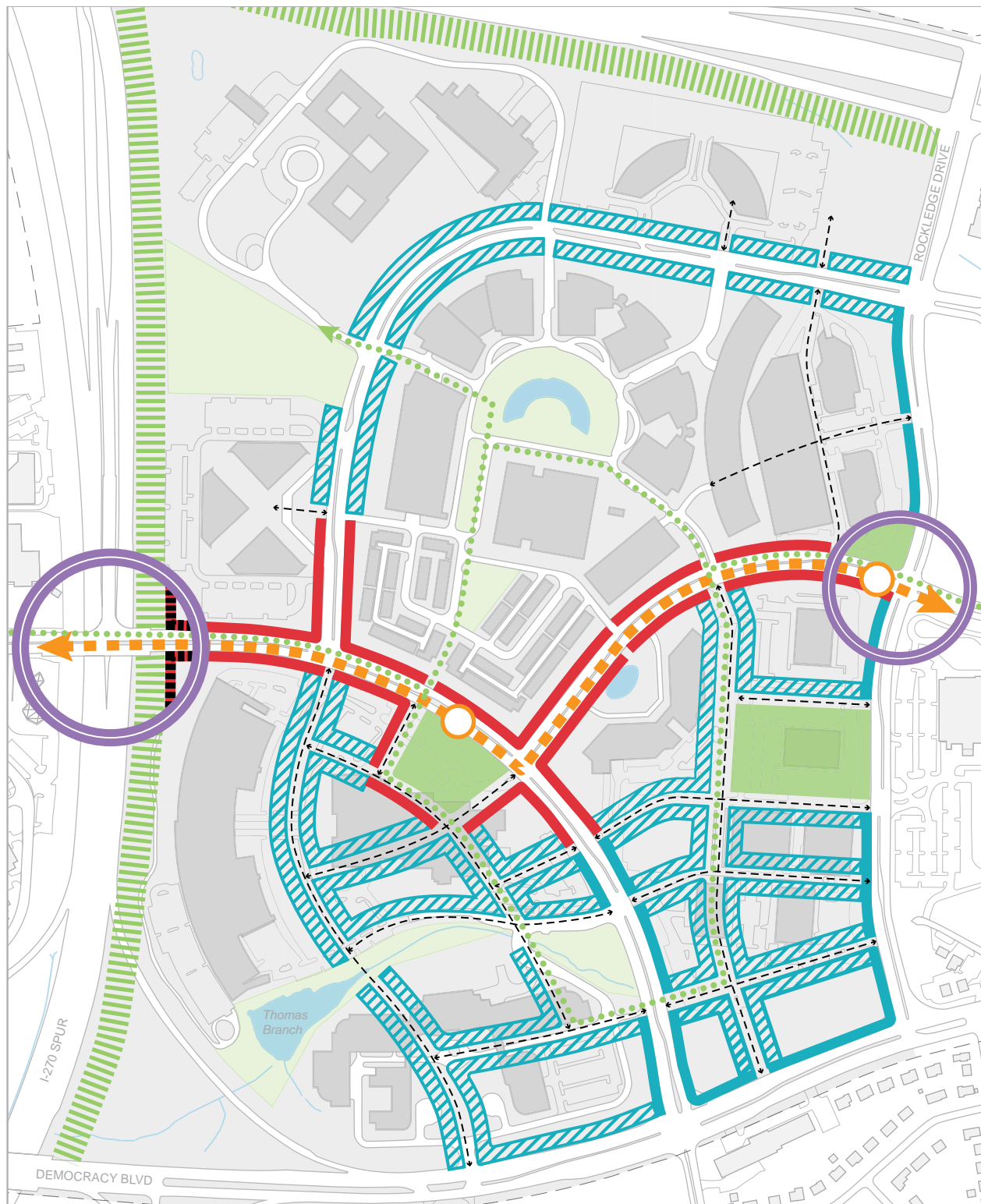


*A rounded architectural treatment at the corner*



*Corner emphasized by a taller entry portal into the building*



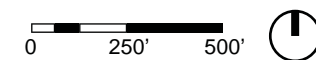


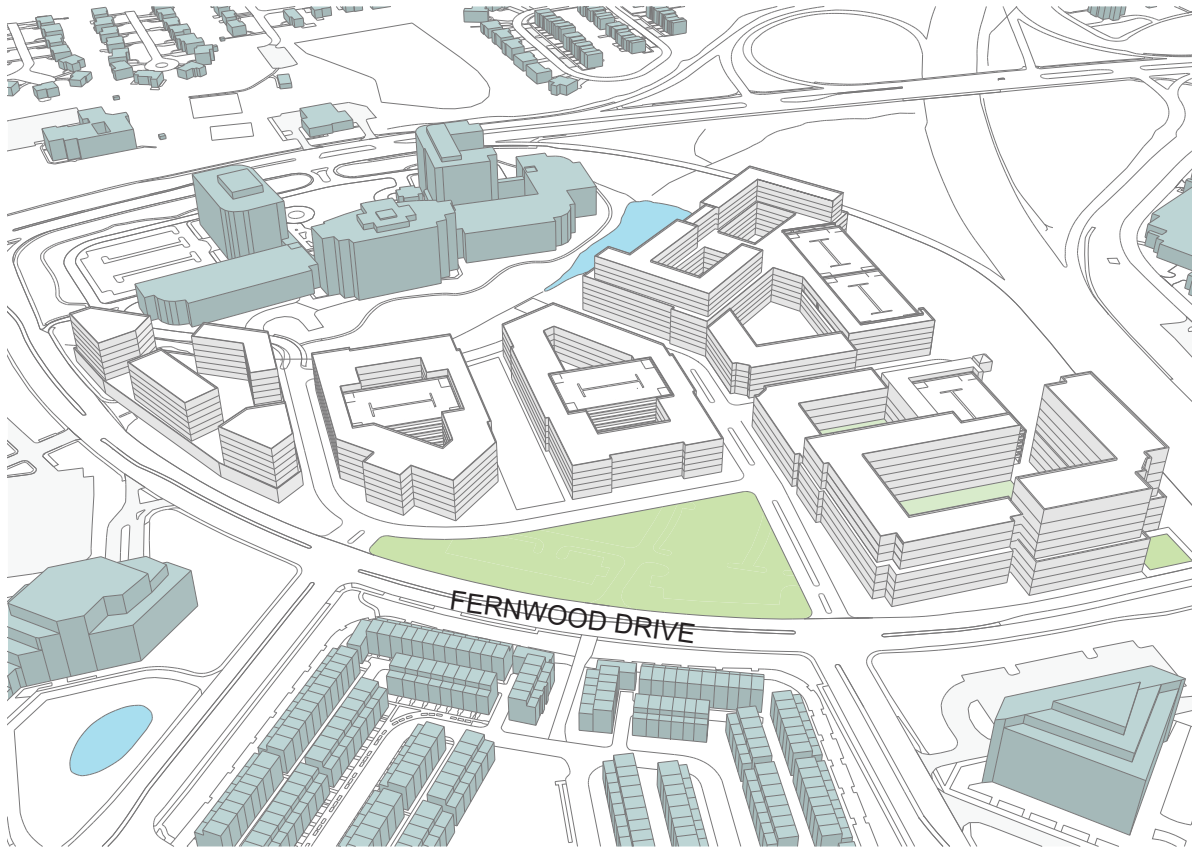
**Figure 3.19: Rock Spring Central Concept Diagram**

**LEGEND**

- ←-- Potential Road
- Build to line with activated ground floor
- Build to line
- Built to area
- Recommended Tall Building
- Recommended Park or Open Space
- Existing Park or Open Space
- Green Link
- Green Buffer
- Proposed BRT Line
- Proposed BRT Stop
- Enhanced Intersection
- Potential Gateway

*Note: Diagrams are for illustrative purposes only. Actual site and building design and locations of open spaces will be evaluated during the regulatory review process*





**Figure 3.20: Illustrative Concept Drawing of Marriott International Headquarters Site Showing a Potential Redevelopment Scenario**

*Note: Diagrams are for illustrative purposes only. Actual site and building design and locations of open spaces will be evaluated during the regulatory review process*

## 3.2.1 Key Properties

### Marriott International Headquarters Site

The headquarters of Marriott International is currently located on 34 acres of property bounded by Fernwood Road to the north and east and the I-270 spur to the west. Marriott is currently in the process of relocating its employees to a new headquarter building in downtown Bethesda. Marriott is already in the process of finding a new owner for the building and the property in Rock Spring Park. This large property currently contains a 7-story tall office building, a structured parking garage, surface parking, as well as green areas. Given its large size, this property could accommodate a variety of scenarios that involve adaptive reuse, infill or tear-down-and-rebuild strategies.

Guidelines:

- ~~All infill and rebuild scenarios should break up the large property into smaller, more walkable blocks.~~
- Adaptive reuse strategies should connect buildings to the surrounding streets through pedestrian friendly open spaces and streetscapes.
- Locate the tallest buildings on site towards the I-270 spur.
- Create a pedestrian friendly frontage along Fernwood Road with buildings opening directly on to the street with active uses, when programmatically feasible.
- Consolidate public open space and locate it in a highly visible area along Fernwood Road. Public Open Space should be designed as a Civic Green.
- Buffer the development from noise from the I-270 spur.



**Figure 3.21: Illustrative Plan of Marriott International Headquarters Site Showing a Potential Redevelopment Scenario**

- Mixed-use buildings that front the street and central spine to create an urban edge
- Civic Green along the central spine and across from proximate to future Bus Rapid Transit Station
- Potential re-use of existing building within new street grid
- Mid-block connection links civic green to existing open space
- Parking located behind buildings
- Mask parking that fronts public space
- Tree-lined streets create a pedestrian friendly environment
- New streets create smaller block sizes

Note: Diagrams are for illustrative purposes only. Actual site and building design and locations of open spaces will be evaluated during the regulatory review process



## **Memorandum**

### **BY HAND DELIVERY**

To: Atul Sharma

CC: Chris Camalier  
John Davis  
Bob Buchanan  
Russ Gestl  
Joshua Sloan  
Trini Rodriguez

From: Steven A. Robins   
Elizabeth C. Rogers

Date: May 13, 2019

Re: Comments on Parking Lots to Places – Urban Design Guidelines for Rock Spring  
& White Flint 2 Sector Plans (Draft March 2019)

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The purpose of this memorandum is to provide Technical Staff with comments on the Draft Design Guidelines for the Rock Spring & White Flint 2 Sector Plans (the "Guidelines"). We are submitting these comments on behalf of the Camalier/Davis/Buchanan team.

### **General Comments:**

1. The Guidelines should be clear that they are just that – guidelines – and that they should be flexible in application. It also should be spelled out that the illustrations in the Guidelines are illustrative in nature. The comment also applies to specific uses for various sites. This should be confirmed on p. 2.
2. Removal of surface parking, while retaining commercial uses, is difficult to achieve even with shared parking arrangements. The Guidelines must be more accepting of surface parking in certain situations.



3. Staff should re-evaluate its recommendations regarding stormwater management. It may be that certain techniques do not necessarily comport with DPS' priorities or credits.
4. It appears that the BRT station locations in the Guidelines are not necessarily consistent with existing easements or between the various figures in the document.
5. The planting design call for natives, but an applicant should be able to plan natives and adapted species that are not invasive.
6. In the Guidelines, "active" versus "pedestrian-friendly" should be better defined. Furthermore, the reality of the difficulty of doing four side activation really should be better acknowledged.
7. Comments on the open spaces on Rock Spring Centre are as follows:
  - a. The number and sizes of the open spaces are problematic;
  - b. The recreation parcel (on the approved plan for Rock Spring Centre and better known as Parcel M) is still referenced on one of the maps. The Camalier/Davis/Buchanan team is proposing that this parcel should be returned to the owners in exchange for a different location within the Plan; and
  - c. The recommendation for trails and recreation in the forested area requires a change in the easement allowances or a change in the easement type, possibly to a Category II easement for some areas.
8. The Road Diet recommended in the Sector Plan should be re-evaluated, both in design and implementation. Along Rock Spring Drive, we would urge Staff to consider recommending in the Guidelines a proposal that essentially flips the location of the bike lanes and sidewalk so that they are able to be implemented now. A formal consideration of the road diet should be deferred until such time as the Transitway became a reality.

**Specific Comments:**

1. P. 3 – Is an Applicant required to submit the application for review by the Design Advisory Panel? The DAP was specifically created for Bethesda, not other areas of the County. How "optional" is this process? Is it really needed?
2. P. 8 – Under "Connectivity," "Vision Zero" is not defined.





3. P. 10 – Under “Transformation,” we believe that there is a need to integrate drive-thrus in some locations. They are limited uses, they are desirable and should be allowed.
4. The Guidelines should more realistically address parking needs, stormwater and utility locations and loading/service areas. Retail, especially grocery, still need good, convenient parking.
5. P. 13 – The statement referenced on Figure 2.5, “Street trees and landscaped buffer added to increase pedestrian safety” should be modified to replace the word “safety” with “comfort.”
6. P. 13 – The Guidelines reference “The Octave” adaptive reuse project as having narrow floor plates. These are rare.
7. The terms “active fronts” and “pedestrian-friendly” are both used and could be more carefully defined as distinct approaches. Frontage on blocks should allow an either/or approach to set priorities. For example, most buildings cannot be “active” on more than one or two sides (emphasis added). This often results in empty shops or unworkable footprints when an attempt is made to activate too many sides of the building. Instead, pedestrian-friendly strategies and other kinds of activation can be applied on the other sides.
8. P. 25 – Townhouse bays and balconies should be allowed to be either grounded or floating.
9. P. 27 – In the 4<sup>th</sup> bullet, should it state “floor plates” instead of “floor slabs?”
10. P. 27 – In the 7<sup>th</sup> bullet, does the illustration example fit the point made in this bullet?
11. P. 30 – In the 3<sup>rd</sup> bullet, should “share” be used rather than “combine”?
12. P. 30 – In the last bullet, what type of “uses” creates transparency? Too much retail space just ends up with posters of activity or artwork – we question whether this is this better than a garage face?
13. P. 31 – In the 1<sup>st</sup> bullet, how much of the parking really needs to be screened? Ground plane elements really seem more important than substantial screening.



14. P. 35 – Civic Greens. It may not be practical to have multiple civic greens in this planning area (and be able to activate each of them). There should be more flexibility in the type, character and size of the open spaces.
15. P. 36 – in the 5<sup>th</sup> bullet under “Urban Plaza,” ¼ to ½ acre is more suitable to an urban plaza. Bigger does not necessarily mean better. These spaces need to be sized right for the location and for the adjacencies and uses.
16. P. 38 – In the 1<sup>st</sup> bullet, limiting the use of stormwater management facilities within public open spaces really is not possible.
17. P. 38 and 40 – all of the comments on stormwater management needs a DPS check so an Applicant is not caught between agencies. Facilities need to be incorporated in public spaces.
18. When referencing “native vegetation,” the term “an adaptive” also should be included.
19. P. 41 – Under the goal to promote energy conservation and on-site energy production, the words “and site” should be inserted in the 4<sup>th</sup> bullet after the word “building.”

**Comments for Rock Spring:**

1. P. 45, Figure 3.8, the location of the transit stop changes from map to map. The Rock Spring Centre project already provided for future dedication of the transit easement.
2. P. 46, Figure 3.9, the recreation park has moved to the Kennedy Shriver Aquatic Center (Wall Park). Furthermore, recreational uses should not be shown at this location as the Applicant is seeking to relocate this use to a more centrally located area within the project.
3. P. 49, Figure 3.10, the transit easement already is provided at a somewhat different location for the station. For Rock Spring Centre, the Figure shows four sided activation that may be difficult to achieve. It could reference activated or pedestrian-friendly.
4. P. 52 – The 3<sup>rd</sup> bullet regarding Georgetown Square should reconfirm that the proposed street can be public or private. This is consistent with the Sector Plan.



5. P. 53 – Comment on Georgetown Square. The Sector Plan shows an illustrative plan that generally is viable. We are not sure why this illustration changed in the Design Guidelines.
6. P. 54 – Comments on Rock Spring Centre
  - 1<sup>st</sup> bullet – The highest intensity uses are near the intersection of Rock Spring Drive and Rockledge Drive, not Old Georgetown Road.
  - 2<sup>nd</sup> bullet – We would suggest striking the language “and previously approved” as it relates to the grid of streets. The proposed amendment to Rock Spring Centre modifies the street grid.
  - 3<sup>rd</sup> bullet – We question why buildings along Rock Spring Drive should be designed to create an appropriately designed base that responds to lower buildings on the Walter Johnson High School site. The Rock Spring Centre property is separated by a large right-of-way and the school use does not seem impacted by nearby height.
  - 5<sup>th</sup> bullet – Strike. The Applicant is requesting that the Planning Board abandon this dedicated parcel along Old Georgetown Road in favor of a more central location.
  - 6<sup>th</sup> bullet – Remove the language “community center” as the Council already has determined that a community center for the Rock Spring area will be provided at Kennedy Shriver Aquatic Center Park.The open space along Rock Spring Drive, if provided, should be incorporated into the transit station easement.
7. P. 55 – We agree with the concept of promoting pedestrian use of the forest conservation areas through trails, exercise stations, educational programs, *etc.*
8. We are concerned about the recommendation regarding the interim recreational field and would request that it be removed from the Guidelines.
9. P. 57 - Figure 3.19, there is a reference to a “Built to area.” What is this and where is it used? Also, what is the “Potential Gateway” reference?
10. P. 63 – Figure 3.25, we continue to object to the “urban recreational park” shown on the Rock Spring Centre site.
11. We are continuing to evaluate the various street sections contained in the Guidelines.



Thank you for consideration of our comments. I am sure that as this process continues, we will be in a position to offer additional comments. In the meantime, feel free to contact me or others on our team and we would be happy to discuss this matter in further detail.



## Memorandum

*By Electronic Mail*

**To:** Atul Sharma  
**From:** Patricia Harris  
**Date:** May 13, 2019  
**Re:** Rock Spring Urban Design Guidelines  
Comments on behalf of Unibail-Rodamco-Westfield

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The following comments on the draft Rock Spring Urban Design Guidelines are provided on behalf of Unibail-Rodamco-Westfield (“URW”), the owner of the Westfield Montgomery Mall.

### I. Westlake Terrace – Recommended Road Section

We note that our comments focus exclusively on the issue of the Westlake Terrace road diet. As a result of Staff and URW working closely and cooperatively for more than the past year, we are in agreement with respect to the other aspects of the Design Guidelines that relate to the Mall property.

As has been discussed with Staff, URW’s primary concern is with the recommended section for Westlake Terrace that would reduce the current section containing two east bound through lanes and turning lanes and two westbound through lanes and turning lanes to one eastbound and westbound through lane and a center turn lane. While this “road diet” extends from Westlake Drive to Old Georgetown Road via Westlake Terrace, Fernwood Road and Rock Spring Drive, the land uses and the character of the overall built environment are significantly different in that area west of the I-270 spur, along Westlake Terrace. Montgomery Mall itself contains more than 1.2 million square feet of retail density, is one of two regional shopping centers in Montgomery County and is zoned GR, distinguishing it from the office park character that dominates most of Rock Spring.

URW’s transportation consultant, Wells + Associates, has prepared the attached preliminary analysis ([Attachment A](#)) of the effects of the road diet on the Mall property. Please note that this analysis focuses on overall Synchro HCM delay and Synchro queue calculations for the intersections along the property frontage on Westlake Terrace, given that the requested study

area is still under discussion with Staff, and details on background developments and site distributions were only recently approved. Wells will provide MNCPPC Staff with a complete analysis prior to the end of May, which will include the CLV analysis for the “yellow” policy area intersections along with all supporting figures and analysis files and materials. Nonetheless, what the summary of this preliminary analysis shows is that with the currently approved but unbuilt developments in the area, as well as the proposed development at the Montgomery Mall site, the proposed lane reduction for the road diet will result in overall intersection delays in excess of the congestion standard at the intersections of Westlake Terrace/Motor City Drive and Westlake Terrace/Fernwood Road/I-270 HOV Ramp during Saturday peak hour. This analysis includes a development program that is forecasted to generate *less* external vehicle traffic than what was analyzed under the previously approved development program for the Westfield Montgomery Mall.

With the existing roadway layout on Westlake Terrace, the delays forecast at these intersections with total future volumes can be mitigated through signal phasing changes such as the introduction of a protected left turn phase. With the proposed road diet, the reduction in lane capacity results in future delays that cannot be mitigated through operational upgrades. The initial analysis also indicates that removing through lane capacity will result in excessive through queues through the corridor, which results in blocking and spillback queue impacts. From this initial summary, it appears that there is sufficient existing roadway capacity on Westlake Terrace to serve the currently approved but unbuilt development in the study area, as well as the currently proposed development program on the Westfield Montgomery Mall Sears property; however, removal of vehicular capacity under the proposed road diet will result in an intersection that exceeds the congestion standard, as well as operational queue issues throughout the corridor.

Notably, the Wells’ analysis did not consider the increased traffic congestion that occurs during the holiday season. While it is recognized that the traffic analysis technically should not focus on the higher than usual traffic congestion that occurs during the holiday season (October through January), it would be unrealistic to totally ignore the consequences of the proposed road diet on these four months of the year. This is especially true given that more than 50 percent of the Mall’s revenues are incurred during this period. Pursuant to the ITE, retail traffic has been observed to increase approximately 50 percent during the holiday season. While it is recognized that the increased traffic does not have a linear impact on the intersections and queues, it nonetheless goes without saying that the results of the road diet -- the excessive congestion standards at the intersections and operational queue issues -- will only be exacerbated during the holiday season.

The December 2017 Rock Spring Sector Plan, in recommending the road diet, provides that the “land use/traffic analysis prepared for this Sector Plan indicates that roads with four travel lanes *may* not be necessary to support existing and potential development.” [Emphasis added]. The Sector Plan continues that the road diet should be considered as a “test case.” Importantly, Staff conducted an analysis based on a local refinement of the regional model, which included some increase in development density and change in use in the Sector Plan area, but does not appear to have captured the full impact of currently approved development at all

intersections. Staff's analysis did not include Westlake Terrace/Auto Park Drive or Westlake Terrace/Motor City Drive, and for the intersections that Staff did study, they only considered overall intersection delay and did not look at queues or any other operational issues.

The Sector Plan provides that the road diet should be *considered*. It does not state that the road diet should be automatically implemented. The Wells' analysis provides MNCPPC with a more complete evaluation of the effects of the road diet and suggests that the existing travel lanes are necessary to support the Mall. Westfield Montgomery Mall is a significant asset to Montgomery County and a decision on the ultimate road section that could potentially reduce the number of travel lanes by half, should be based on a comprehensive analysis, not solely on the initial preliminary study that was done as part of the Sector Plan. It is important to note that implementation of a road diet that unduly constrains access to the Mall will likely drive customers elsewhere to more convenient shopping alternatives – a result that is undesirable for the County, for the residents and for URW.

Finally, URW questions the rationale for locating the separated bike lane on the south side of West Lake Terrace and recommends that it be relocated to the north, given the minimal number of curb cuts along the northern frontage of Westlake Terrace. The bike lane could remain along the northern frontage eastward until Rock Spring Drive to Old Georgetown Road. It is noted that this northern location is more consistent with the May 2018 Bicycle Master Plan and would be preferred from an operational standpoint,

Importantly, URW understands the importance of enhancing the pedestrian experience and providing a bike lane along Westlake Terrace and believes that both of these can be accommodated within a modified Westlake Terrace section that at the same time accommodates the Mall's access needs. In connection with the complete analysis to be submitted prior to the end of May, a modified road section will be proposed.

## II. Additional Design Guideline Comments

We have attached additional comments on the Design Guidelines unrelated to the Westlake Terrace road diet issue and request a meeting to further discuss these recommendations (See Attachment B). In the interim, we highlight the following:

1. Page 69 – Due to grades as well as current ownership interests of the Mall property, future development of the southwest portion of the site would not be oriented toward Westlake Drive. The build to line along Westlake Drive should be eliminated.
2. Page 72 – As has been discussed, it is not possible to extend Autopark Avenue and Motor City Drive through the Mall property. This bullet should be eliminated.
3. Page 73 – As noted, there are no internal public streets within the Mall property and references should clarify the status of these internal access ways.
4. Page 73 – The development in the southwest corner of the Mall property is unrealistic due to grades and existing ownership interests. Moreover, URW does not own or have any interest in the gas station that occupies the corner of Westlake Drive and Democracy Boulevard.

### III. Conclusion

Unlike any other site within the Rock Spring Sector Plan area, the Westfield Montgomery Mall property is zoned GR – General Retail. This zone recognizes that retail is the primary use of the Property and it is intended to remain as such. All of the comments provided herein are intended to promote the continued retail viability of the Mall property and to ensure that the recommendations do not otherwise diminish this important retail asset.

We look forward to continuing to work with Staff to resolve the issues identified.

### Attachments

cc: Jim Agliata  
Andrea Hidalgo  
Maggie Ross  
Barbara Mosier



# WELLS + ASSOCIATES

## MEMORANDUM



1110 Bonifant Street  
Suite 210,  
Silver Spring, MD 20910  
301-448-1333  
[WellsandAssociates.com](http://WellsandAssociates.com)

**TO:** Andrea Hidalgo  
Jim Agliata  
Unibail-Rodamco-Westfield

**FROM:** Barbara Mosier, PE, PTOE

**COPY:** Patricia Harris, Learch Early & Brewer

**RE:** Westfield Montgomery Mall – Road Diet Assessment Summary

**DATE:** 5/13/2019

---

Wells and Associates has assessed the operations of Westlake Terrace between Westlake Drive and the I-270 HOV Ramp to determine the impact of the proposed road diet along Westlake Terrace with the proposed development program at the Westfield Montgomery Mall.

The Westfield Montgomery Mall site is located in the Bethesda area of Montgomery County, north of Democracy Boulevard, west of the I-270 spur, east of Westlake Drive and south of Westlake Terrace. Access to site parking structures and the internal ring road is provided at two one-way access points on Democracy Boulevard, multiple driveways on Westlake Drive, and two signalized intersections on Westlake Terrace. The site is currently improved with approximately 1.3 million square feet of retail space, and it was previously approved for a 500,000 SF expansion of retail space, which was later amended to include an additional parcel for a total of 1,767,177 SF of retail space (with potential for a portion of that space being used as a hotel). The traffic study conducted at that time utilized a site-specific trip generation rate derived from site driveway counts gathered in 2004. Based on the previously approved and applied trip generation rates from the 2004 traffic study, the proposed 1.76M SF of retail space was projected to generate 1,590 AM and 5,832 PM total peak hour vehicular trips.

The current proposal for the site includes removing a portion of the existing retail and constructing a new mixed-use area adjacent to the remaining existing mall including a smaller retail expansion than previously contemplated for a total of 1,548,079 SF of retail on site, 717 mid-rise dwelling units, a 261-room hotel and 26,260 SF of office space. Based on current MNCPPC trip generation procedures, including the application of ITE 10<sup>th</sup> edition rates, ITE internal trip reductions for mixed-use developments and the MNCPPC LATR policy area trip conversion factors, the future development is expected to generate 1,278 AM, 2,812 PM and 4,280 Saturday total peak hour vehicular trips. Please note a substantial proportion of these trips are existing trips, and only net new trips are applied to the roadway network.

## MEMORANDUM

The *Rock Spring and White Flint 2 Design Guidelines* recommend a road diet along Westlake Terrace. As shown in the Westlake Terrace and Fernwood Drive cross-sections on pages 75-76 of the draft Design Guidelines, the proposal includes removal of a through lane in each direction, to result in a single travel lane in each direction with a center left-turn lane. This memo summarizes the impact of this proposed road diet on Westlake Terrace along the Montgomery Mall property frontage with the proposed development plan.

The scope and assumptions for this analysis have been reviewed by MNCPPC staff, as shown in the attached scoping correspondence. Though the full scope for this study remains under discussion, the technical assumptions in the analysis summarized here have been reviewed and approved. For this summary analysis the following intersections have been included:

1. Westlake Terrace/Westlake Drive
2. Westlake Terrace/Auto Park Avenue
3. Westlake Terrace/Motor City Drive
4. Westlake Terrace/Fernwood Road/I-270 HOV Ramp

Existing vehicular, pedestrian and bike volume and geometric data was collected for each of these intersections during both weekday and Saturday peak hours on Tuesday, April 9, 2019 and Saturday, April 13, 2019. The intersection of Westlake Terrace/Fernwood Road/I-270 HOV Ramp is located on the boundary of the North Bethesda policy area; the remaining study intersections are located within the Potomac policy area.

Existing peak hour delays were estimated at the study intersections based on: the existing lane use and traffic control; existing traffic signal phasing/timing obtained from Montgomery County Department of Transportation (MCDOT); the existing bicycle, pedestrian, and vehicular peak hour traffic volumes; and the Highway Capacity Manual (HCM) 2000 methodologies, using Synchro 9. The existing results are attached to this memo and summarized in Table 1.

As shown in Table 1, based on the criteria established for the North Bethesda and Potomac policy areas, the study intersections currently operate below their respective congestion standard during the AM, PM and Saturday peak hours, with the exception of Westlake Terrace/Motor City Drive during the Saturday peak hour.

The following six (6) pipeline developments (currently approved and/or pending approval within the area surrounding the site) were identified by the M-NCPPC during the scoping process for inclusion in this study:

1. Rock Spring Park (Plan No. 11998093B)

## MEMORANDUM

2. WMAL (Plan No. 120160290)
3. Rock Spring Center (Plan No. 11998092B)
4. Cabin John Village (Plan No. 120180120)
5. Ourisman Property Redevelopment (Plan No. 82009014)
6. Wildwood Manor (Plan No. 82008024B)

Collectively these developments are projected to generate 2,068 AM peak hour trips, 2,488 PM peak hour trips and 2,484 Saturday peak hour trips. With the exception of the Ourisman Property Redevelopment, the majority of these trips are not forecast to travel through this study area.

The background peak hour delays with these forecast background trips were calculated based on the existing lane use and traffic control as outlined previously. The results are summarized in Table 1. These background volumes were also used to calculate background future delays with the proposed road diet, which is also summarized on Table 1.

Because only a single cross section was provided for each roadway, the following assumptions were made regarding the Road Diet scenario intersection lane use:

- Eastbound and Westbound approaches were assumed to consist of a single shared through-right lane and a left-turn lane.
- Northbound and southbound approaches were assumed to remain as currently existing
- The split phased westbound approach at the intersection of Westlake Drive/Westlake Terrace was assumed to consist of a left-turn lane and a shared left-through-right lane. Removal of the dedicated right-turn lane also results in removal of the right-turn overlap phase currently provided. Because of these changes, under the road diet scenario, all signal splits were optimized, but phasing was held constant.

As shown on Table 1, similar to existing conditions, both with and without the road diet, all intersections will operate with delays within the congestion standard, with the exception of Westlake Terrace/Motor City Drive during the Saturday peak hour.

The net trips to be generated by the proposed development at the Westfield Montgomery Mall as described previously were distributed to the area roadways based on the distributions as approved by staff, with driveway assignments based on area travel patterns and existing driveway utilization. These site trips were added to the background traffic forecast as discussed previously to produce the total future traffic volumes. These total future traffic volumes were applied to both the existing roadways as well as the Road Diet scenario, and the resulting intersection vehicular delays are summarized in Table 1.

## MEMORANDUM

As shown in Table 1, with the existing roadway layout and total future volumes, the intersection of Westlake Terrace/Motor City Drive will continue to operate above the congestion standard during the Saturday peak hour. The intersection of Westlake Terrace/Fernwood Road/I-270 HOV Ramp will also exceed the standard during the Saturday peak hour. The following signal phasing and timing improvements were tested to improve these intersections:

- Southbound and eastbound permitted/protected left turn phases at Westlake Terrace/Motor City Drive
- An eastbound protected left-turn phase at Westlake Terrace/I-270 HOV Ramp
- Increase the cycle length at the I-270 HOV Ramp to 120, and optimize the corridor offsets and splits for better coordination

With these operational improvements, all intersections are projected operate within the congestion standard.

Under the Road Diet scenario, with total future volumes, the intersections of Westlake Terrace/Motor City Drive and Westlake Terrace/I-270 HOV Ramp will exceed the congestion standard during the Saturday peak hour. The same phasing improvements as identified above were also tested under this scenario, and *do not* improve the intersection delay at Westlake Terrace/Motor City Drive such that it operates within their respective policy area congestion standard.

The 95<sup>th</sup> percentile queues as calculated by Synchro 9 were also analyzed for the scenarios outlined above and are summarized in Table 2. As shown in Table 2, with the proposed road diet, queues are projected to exceed the available storage in multiple eastbound and westbound through movements in the corridor in both the PM and Saturday peak hours. These excessive queues have the potential to cause blocking delays and spillback through adjacent intersections.

Based on this preliminary analysis, the Road Diet as outlined in the draft Rock Spring and White Flint 2 Design Guidelines would reduce roadway capacity such that it could not serve the currently approved but unbuilt development without causing intersections to operate with excessive queues and vehicle delays in excess of their congestion standard. The reduction in roadway capacity would be likely to cause additional congestion and delay during the winter season when the ITE *Trip Generation Manual* seasonal variation data for use code 820 indicates that the shopping center could experience up to a 52% traffic volume increase in December over a typical April day.

Table 1  
Westfield Montgomery Mall - Road Diet Analysis  
Intersection Delays Summary

Intersection/Corridor	Intersection Control	Critical Movement	Congestion Standard	Existing Conditions			Background Conditions (with Existing Roadway)			Total Future Conditions (with Existing Roadway)			Background Conditions (with Road Diet)			Total Future Conditions (with Road Diet) <sup>1</sup>		
				AM	PM	Saturday	AM	PM	Saturday	AM	PM	Saturday	AM	PM	Saturday	AM	PM	Saturday
1. Westlake Terrace/Westlake Drive	Signal	OVERALL	55	27.3	38.8	35.1	29.6	48.5	39.2	32.1	46.7	44.4	32.4	33.4	37.8	32.0	32.4	44.7
2. Westlake Terrace/Auto Park Avenue	Signal	OVERALL	55	39.6	31.9	40.3	37.1	30.0	37.5	36.4	30.3	40.1	36.0	27.6	37.6	36.0	30.4	44.8
3. Westlake Terrace/Motor City Drive with Signal Phasing and Timing Improvements	Signal	OVERALL	55	11.0	25.3	101.2	12.9	28.0	180.1	13.8	30.5 18.4	162.2 40.5	14.2	31.1	184.2	16.8	25.9 32.4	191.7 93.6
4. Westlake Terrace/Fernwood Road/I-270 Spur Ramps with Signal Phasing and Timing Improvements	Signal	OVERALL	71	16.8	6.0	10.2	16.4	6.4	25.8	16.9	7.1 20.9	77.6 25.6	19.1	8.2	60.1	20.7	10.6 27.2	173.3 63.6

Notes:  
(1) Delays are presented as units of seconds.  
(2) Synchro 10.2 (build 0, rev 45) was used to determine vehicle delays, unless otherwise specified.  
(3) Road Diet scenario includes signal split optimization while maintaining signal phasing and cycle length.

Table 2  
Westfield Montgomery Mall - Road Diet Analysis  
Intersection Queue Summary

Intersection	Intersection Control	Critical Movement	Storage Length/Link Distance	Existing Conditions			Existing Volumes with Road Diet			Total Future Conditions with Existing Roadway			Total Future Conditions with Road Diet		
				AM 95th Percentile	PM 95th Percentile	SAT 95th Percentile	AM 95th Percentile	PM 95th Percentile	SAT 95th Percentile	AM 95th Percentile	PM 95th Percentile	SAT 95th Percentile	AM 95th Percentile	PM 95th Percentile	SAT 95th Percentile
1. Westlake Terrace/Westlake Drive	Signal	EBL	135	59	60	54	59	60	54	59	60	54	59	60	54
		EBTR	1000+	129	83	102	129	83	102	129	83	102	129	83	102
		WBL	190	142	197	255	208	125	298	175	190	323	228	207	542
		WBT/WBLTR	480	141	200	255	104	149	133	178	185	325	122	256	216
		WBR	480	56	176	94	n/a	n/a	n/a	68	239	119	n/a	n/a	n/a
		NBL	130	18	30	35	23	37	38	18	30	35	25	37	39
		NBTR	860	83	194	228	108	251	256	85	216	278	125	288	374
		SBL	245	191	117	153	213	157	178	292	157	350	290	218	413
		SBTR	1000+	60	87	94	67	118	109	63	92	95	71	122	117
2. Westlake Terrace/Auto Park Avenue	Signal	EBL	240	167	130	328	185	113	182	164	140	343	210	138	264
		EBTR	460	260	159	187	510	364	469	322	234	327	430	518	767
		WBL	160	29	28	109	35	20	117	69	59	220	81	41	231
		WBTR	350	61	107	142	176	202	353	86	230	201	242	616	477
		NBL	190	21	71	110	21	71	114	67	103	246	67	103	246
		NBTR	190	30	68	63	30	68	65	52	77	85	52	77	85
		SB	400	60	65	104	60	65	106	60	63	108	60	63	108
3. Westlake Terrace/Motor City Drive  with Signal Phasing and Timing Improvements	Signal	EBL	160	15	74	53	45	67	88	23	99	133	29	58	82
		EBTR	350	28	215	83	477	437	543	53	276	137	470	578	599
		WBL	150	54	79	147	54	101	328	78	93	320	71	132	675
		WBTR	535	41	119	62	146	446	374	69	178	112	260	920	536
		NBL	190	25	63	76	25	56	61	36	75	205	37	61	205
		NBTR	190	55	77	107	55	67	86	62	81	141	64	65	141
		SBL	260	138	258	419	138	196	300	204	346	549	212	236	549
		SBTR	500	53	62	108	53	54	83	54	64	115	56	52	115
	Signal	EBL	160	n/a	n/a	na	n/a	n/a	n/a	n/a	59	87	n/a	37	156
		EBTR	350	n/a	n/a	na	n/a	n/a	n/a	n/a	121	413	n/a	421	875
		WBL	150	n/a	n/a	na	n/a	n/a	n/a	n/a	17	517	n/a	82	445
		WBTR	535	n/a	n/a	na	n/a	n/a	n/a	n/a	24	126	n/a	843	385
		NBL	190	n/a	n/a	na	n/a	n/a	n/a	n/a	82	106	n/a	67	108
		NBTR	190	n/a	n/a	na	n/a	n/a	n/a	n/a	91	126	n/a	92	217
		SBL	260	n/a	n/a	na	n/a	n/a	n/a	n/a	195	325	n/a	241	388
		SBTR	500	n/a	n/a	na	n/a	n/a	n/a	n/a	56	110	n/a	69	122
4. Westlake Terrace/Fernwood Road/I-270 Spur HOV Ramp  with Signal Phasing and Timing Improvements	Signal	EBL	315	67	121	394	78	137	416	107	302	527	119	349	635
		EBT	540	133	65	88	370	158	205	190	91	209	525	242	450
		WBT	635	119	93	116	321	257	301	149	135	265	370	449	706
		WBR	270	16	25	7	18	25	6	16	27	9	16	27	6
		SBLR	1000+	307	79	103	286	79	90	333	86	237	354	86	289
		EBL	315	n/a	n/a	n/a	n/a	n/a	n/a	n/a	315	443	n/a	361	441
	Signal	EBT	540	n/a	n/a	n/a	n/a	n/a	n/a	n/a	203	260	n/a	261	278
		WBT	635	n/a	n/a	n/a	n/a	n/a	n/a	n/a	360	482	n/a	974	1273
		WBR	270	n/a	n/a	n/a	n/a	n/a	n/a	n/a	85	16	n/a	117	15
		SBLR	1000+	n/a	n/a	n/a	n/a	n/a	n/a	n/a	117	120	n/a	118	120

Notes:  
(1) Synchro 10.2 (build 0, rev 45) was used to calculate 95th percentile queues, unless otherwise specified.  
(2) Queues are reported in units of feet. In general, one vehicle length approximates to 25 feet.  
(3) Road Diet scenario includes signal split optimization while maintaining signal phasing and cycle length.

**ATTACHMENT I**  
**Scope of Work**







**MONTGOMERY COUNTY PLANNING DEPARTMENT**  
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

**Local Area Transportation Review**

**TRANSPORTATION IMPACT STUDY SCOPE OF WORK AGREEMENT**

<b>Contact Information</b>				
Transportation Consultant (company, contact name, email, and phone number)	Wells + Associates Barbara Mosier, <a href="mailto:bjmosier@wellsandassociates.com">bjmosier@wellsandassociates.com</a> , 301.971.3425			
Name of Applicant / Developer	Montgomery Mall Owner, LLC			
<b>Project Information</b> <i>Include Tables/Graphics, As Needed</i>				
Project Name (include plan no. if known)	Westfield Montgomery Mall (12005018C)			
Project Location (include address if known)	<u>7101 Democracy Boulevard Bethesda MD 20817</u>			
Policy Area(s) (subdivision staging policy map)	Potomac	Master Plan(s) / Sector Plan Area(s)		Rock Spring
Application Type(s)	<input checked="" type="checkbox"/> Preliminary Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Sketch/Concept/Pre-Preliminary (Optional)	<input type="checkbox"/> Amendment
	<input type="checkbox"/> Conditional Use (formerly special exception)	<input type="checkbox"/> Local Map Amendment	<input type="checkbox"/> APF at Building Permit	<input type="checkbox"/> Other: _____
Project Description & Previous Approvals  (proposed land uses, zoning, no. of units, square footage, construction phasing, prior approvals and proposals, existing uses, site operations, year built, status of Adequate Public Facilities [APF], other relevant info)	<p>The applicant proposes to redevelop a portion of the existing retail space to become a mixed used development. Upon completion the full site will include approximately 717 mid rise dwelling units, a 261 room hotel, 26,260 SF of office, and 1,548,079 SF of retail. (which includes the existing retail to remain)</p> <p>This site currently has active APF approval for 1,767,177 total SF of retail space, which included several required traffic mitigation measures which have since been constructed. The proposed development plan will generate less auto driver trips than were studied under the previous approval; therefore, a full LATR study should not be required. In order to reflect the potential changes to roadway use patterns along the northern edge of the site due to the change in the uses on that sector of the development, as well as to understand the impact of the proposed road diet, a study of the Westlake Terrace frontage is proposed.</p>			
1.Site Access  (proposed access location(s), existing/adjacent/opposite curb cuts, interparcel connections, access configurations and restrictions, internal circulation, private roads, parking/loading areas, other relevant info)	Access to the property will continue to be provided from the existing access points on Westlake Terrace, Westlake Drive and Democracy Blvd. The access points on Westlake Terrace include Westlake Terrace/Motor City Drive and Westlake Terrace/Auto Park Drive.			

<b>2. Transportation Analysis Requirement</b>	<input type="checkbox"/> <b>Transportation Impact Study</b> Generates <u>50 or more</u> total weekday peak hour person trips (vehicular, transit, bicycle, and/or pedestrian) with no reductions other than a credit for existing developments over 12 years old, <u>AND</u> is outside of the White Flint and White Oak Policy Areas. Fill out remainder of this form and include in transportation impact study appendix.		<input type="checkbox"/> <b>Transportation Study Exemption Statement</b> Generates <u>49 or fewer</u> total weekday peak hour person trips (vehicular, transit, bicycle, and/or pedestrian) with no reductions other than a credit for existing developments over 12 years old, <u>OR</u> within White Flint and White Oak Policy Areas. Fill out PAR and trip generation sections below, and include with exemption statement.		
<b>3. Policy Area Review (PAR)</b>  Only for projects filed before 1/1/17	<input type="checkbox"/> <b>TPAR</b> (1/1/13 – 12/31/16) 0, 25, 50%: _____ (TPAR = Transportation Policy Area Review)	<input type="checkbox"/> <b>PAMR</b> (11/15/07 - 12/31/12) 0-50%: _____ (PAMR = Policy Area Mobility Review)	<input checked="" type="checkbox"/> <b>Exempt</b> (no square footage increase or fewer than 3 new trips) <b>or</b> 1/1/17 or later) <input type="checkbox"/> <b>No PAR</b> (7/1/03 – 11/14/07) <input type="checkbox"/> <b>PATR</b> (before 6/30/03) (PATR = Policy Area Transportation Review)		
<b>4. Transportation Mitigation Agreement (TMAg) Required?</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>Yes</b> (25+ Employees and in Transportation Management District [TMD])	<input checked="" type="checkbox"/> <b>Amend Existing TMAg</b>		
<b>5. Established Transportation Management District (TMD)?</b>	<input type="checkbox"/> <b>No</b>	<input checked="" type="checkbox"/> <b>Yes</b> TMD Name: ____ North Bethesda _____			
<table border="0" style="width: 100%;"> <tr> <td style="width: 50%;"><b>Transportation Impact Study Assumptions</b></td> <td style="width: 50%; text-align: right;"><i><b>Include Tables/Graphics, As Needed</b></i></td> </tr> </table>				<b>Transportation Impact Study Assumptions</b>	<i><b>Include Tables/Graphics, As Needed</b></i>
<b>Transportation Impact Study Assumptions</b>	<i><b>Include Tables/Graphics, As Needed</b></i>				
<b>6. Study Years / Phases</b>	Existing Year: 2019      Phases / Build-out Year(s): Not Yet Known				
<b>7. Study Periods</b>	<input checked="" type="checkbox"/> <b>AM</b> <input checked="" type="checkbox"/> <b>PM</b> <input type="checkbox"/> <b>Mid-day</b> <input checked="" type="checkbox"/> <b>Saturday</b> <input type="checkbox"/> <b>Sunday</b> <input type="checkbox"/> <b>Other:</b> _____				
<b>8. Study Intersections</b> (For projects generating 50 or more person trips, list all signalized & significant unsignalized intersections, and site driveways traffic counts <b>must be collected within 12-months of completed and accepted application</b> )	# of tiers of intersections to study (refer current LATR Guidelines): _____1*_____ <i>For the purpose of determining the number of tiers of study intersections, trip calculation for the subject site should also include nearby unbuilt properties in common ownership. No trip reductions should be taken in this calculation other than a credit for existing developments over 12 years old.</i>				
	1) Westlake Terrace/Westlake Drive	7)			
	2) Westlake Terrace/Auto Park Drive	8)			
	3) Westlake Terrace/Motor City Drive	9)			
	4) Westlake Terrace/I-270 Ramps	10)			
	5)	11)			
	6)	*Study area based on road diet impacts.			

<b>9.Trip Generation</b>  (clearly cite sources and methodology including use of average rates vs. equation; include trip generation for existing site, current approvals, proposed uses, and net changes)	<b>Total Person Trips</b> <b>AM/PM (Net)</b>	<b>Vehicle Trips*</b> (Auto Driver) <b>AM/PM(Net)</b> 70 AM/-111 PM (312AM/1037PM Previously approved)	<b>Transit Trips*</b> <b>AM/PM(Net)</b>	<b>Walking Trips*</b> (non-motorized + transit) <b>AM/PM(Net)</b>	<b>Bicycling Trips*</b> (non-motorized) <b>AM/PM(Net)</b>
<i>* Only required if total peak hour person trips are 50 or more in either the AM or PM peak hour. Sum of all vehicle, transit, and non-motorized trips shall be the equivalent of total person trips. Use table at the end of the form to show all calculations and assumptions for mode breakout.</i>					
<b>10.Trip Reductions</b>  (include justification and supporting documentation for internal capture, pass-by, diverted, Transportation Demand Management)	Internal trip reductions and pass-by trip calculations based on ITE Trip Generation Manual. Previous approved trip numbers based on approved traffic study for original APF approval.				
<b>11.Trip Distribution %</b>  (include a map of the proposed project in addition to a list or table)	Commercial: 35% North via I-270 10% North via Westlake Terrace 15%South via I-270 20% East via Democracy Blvd or Fernwood 20% West via Democracy Blvd  Residential: 40% North via I-270 5% North via Westlake Terrace 20%South via I-270 25% East via Democracy Blvd or or Fernwood 10% West via Democracy Blvd				
<b>12.Pipeline Developments to be considered as background traffic</b>  (include name, plan #, land uses, and sizes for approved but unbuilt developments or concurrently pending applications; info can be obtained from the M-NCPPC Pipeline website: - website is updated quarterly)	<ol style="list-style-type: none"> <li>1. Rock Spring Park – 11998093B             <ul style="list-style-type: none"> <li>• 168 Townhomes</li> <li>• General Office 1,554,983 SF</li> <li>• Daycare 18,000 SF</li> </ul> </li> <li>2. WMAL (120160290) – 150 townhomes, 159 SF DU.</li> <li>3. Rock Spring Center (11998092B)             <ul style="list-style-type: none"> <li>• Apartments 1,250 DU (less 386 DU built)</li> <li>• General Office 549,900 SF</li> <li>• General Retail 210,000 SF</li> <li>• Retail – Entertainment 90,000 SF</li> <li>• Community Center 30,000 SF</li> <li>• Hotel 200 Rooms</li> </ul> </li> <li>4. Cabin John Village (120180120) – 59 Townhomes, 300,000 SF retail</li> <li>5. Oursiman Property Redevelopment (82009014) – 344 Multifamily DU</li> </ol>				

<p>13.Pipeline Transportation Projects to be considered as background condition</p> <p>(fully funded for construction in County Capital Improvement Program, State Consolidated Transportation Program, developer projects, etc. within the next 6 years)</p>	<p>Though it is not yet funded, this study will consider the effect of the proposed road diet on the subject site, both with and without the planned redevelopment. The road diet concept being studied is based on Rock Spring plan and the associated draft Urban Design Guidelines.</p>
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Preliminary Mitigation Analysis		<i>*Refer to the LATR Guidelines for details on how to mitigate</i>	
14.Vehicular Analysis	<input type="checkbox"/> Vehicular Analysis Anticipated (Vehicular mitigation to be determined after study)	<ul style="list-style-type: none"> <li>TEST: HCM Analysis is required to be provided for all intersections analyzed in studies for: 1) "Red &amp; Orange" policy areas, and 2) intersections with a CLV of more than 1,350 in "Yellow &amp; Green" policy areas. 3) <b>CLV analysis required for all intersections regardless of policy area. CLV assessment and signal timing worksheets are to be included in the study appendix.</b></li> <li>MITIGATION: Required if HCM delay analyses exceed policy area standard</li> </ul>	
15.Pedestrian Analysis	<input type="checkbox"/> Pedestrian Mitigation Anticipated	<ul style="list-style-type: none"> <li>TEST: If the plan generates 50 or more pedestrian peak hour trips, mitigation of surrounding pedestrian conditions is required</li> <li>MITIGATION: Required if ADA non-compliance issues within 500 foot radius of site boundary and if pedestrian crosswalk delay at LATR intersections within 500 feet of site boundary is lower than Level of Service (LOS) D</li> </ul>	
16.Bicycle Analysis	<input type="checkbox"/> Bicycle Mitigation Anticipated	<ul style="list-style-type: none"> <li>TEST: If the plan generates 50 or more bicycle peak hour trips and is within 0.25 miles of an existing educational institution or existing/planned bikeshare station, mitigation of surrounding bicycle conditions is required</li> <li>MITIGATION: Required to make improvements to provide a low Level of Traffic Stress to any existing similar facility within 750 feet of the site boundary; Alternatively, project may provide a master planned improvement that provides an equivalent improvement in the level of traffic stress for cyclists</li> </ul>	
17.Transit Analysis	<input type="checkbox"/> Transit Mitigation Anticipated	<ul style="list-style-type: none"> <li>TEST: If the plan generates 50 or more transit peak hour trips and the peak load of bus routes at bus stops within 1,000 feet of site boundary exceeds (or is worse than) peak load of LOS D (1.25 transit riders per seat during the peak period in the peak direction), mitigation of transit conditions is required</li> <li>MITIGATION: Required to provide or fund improvements that would mitigate the trips exceeding the standard that are attributable to the development</li> </ul>	
Additional Analysis or Software Required	<input checked="" type="checkbox"/> Queuing Analysis <input type="checkbox"/> Signal Warrant Analysis <input type="checkbox"/> Weaving/Merge Analysis	<input type="checkbox"/> Accident Analysis <input checked="" type="checkbox"/> Synchro <input type="checkbox"/> SIDRA	<input type="checkbox"/> VISSIM <input type="checkbox"/> CORSIM <input type="checkbox"/> Other _____

### **M-NCPPC Clarifications**

- Transportation impact study will comply with all other requirements of the LATR Guidelines not listed on this form.
- If physical improvements are proposed as mitigation, the transportation impact study will demonstrate feasibility with regards to right-of-way and utility relocation (at a minimum).
- In the event that the development proposal significantly changes after this transportation impact study scope has been agreed to, the Applicant will work with M-NCPPC staff to amend the scope to accurately reflect the new proposal.
- A receipt from MCDOT showing that the transportation impact study review fee has been paid will be provided to M-NCPPC DARC at the time the development application is submitted.
- Minimum of seven paper copies (more if near the County line or an incorporated City) and two PDF copies of the transportation impact study and appendices will be provided.

### **Additional Assumptions / Special Circumstances for Discussion**

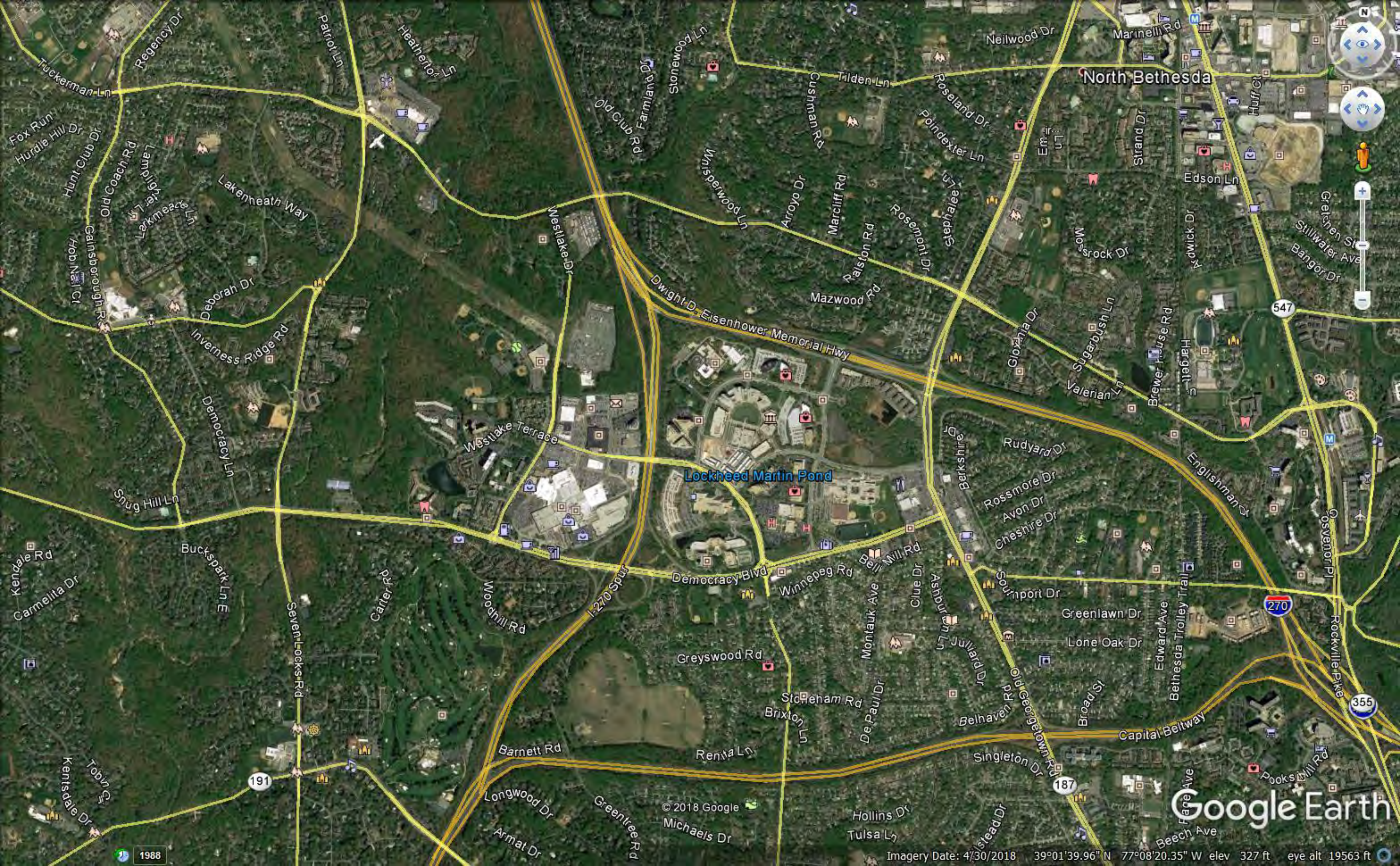
Note – see attached trip generation table for detailed trip calculations, comparison to existing development trips and comparisons to previously approved study trips.

Land Use	LUC	Amount	Unit	Trip Generation by Mode																			
				AM Peak Hour			PM Peak Hour			Auto Driver	Auto Passenger	AM Peak Hour			Pedestrian	Person Trips	Auto Driver	Auto Passenger	PM Peak Hour			Pedestrian	Person Trips
				In	Out	Total	In	Out	Total			Transit	Non-Motorized Including Bicycle Trips	Transit					Non-Motorized Including Bicycle Trips	Transit	Non-Motorized Including Bicycle Trips		
Approved Development Program - 2004 Study Rates																							
Total Approved	TTG - 2004	1,767,177	SF	986	604	1590	2,799	3,033	5,832														
Total Built	TTG - 2005	1,342,550	SF	749	459	1208	2,126	2,304	4,430														
REMAINING Approved Trips				237	145	382	673	729	1,402														
Proposed Quantities - ITE 10th Edition Rates																							
General Office	710	26,260	SF	44	7	51	5	27	32	50	13	1	3	4	67	31	8	1	2	3	42		
Mid-Rise	221	717	DU	67	191	258	192	123	315	250	107	16	26	42	399	306	131	20	32	52	489		
General Retail	820	1,548,079	SF	574	352	926	1,980	2,146	4,126	889	327	23	34	57	1,274	3961	1458	102	153	255	5,675		
Hotel	310	261	Rooms	74	51	125	87	83	170	123	32	3	6	9	164	167	43	5	8	13	223		
Subtotal				759	601	1,360	2,264	2,379	4,643	1312	479	43	69	112	1,904	4465	1640	128	195	323	6,429		
INTERNAL TRIP REDUCTIONS																							
Office Person Trips	710	26,260	SF	58	9	67	7	35	42														
less internal capture				(6)	(3)	(9)	(6)	(8)	(14)														
Office External Person Trips				52	6	58	1	27	28	43	11	1	2	3	58	21	5	1	1	2	28		
Residential Person Trips	221	717	DU	104	295	399	298	191	489														
less internal capture				(2)	(5)	(7)	(138)	(90)	(228)														
Residential External Person Trips				102	290	392	160	101	261	245	105	16	25	41	392	163	70	11	17	28	261		
Retail Person Trips	820	1,548,079	SF	790	484	1274	2724	2951	5675														
less internal capture				(15)	(4)	(19)	(104)	(158)	(262)														
Retail External Person Trips				775	480	1255	2620	2793	5413	876	323	23	34	57	1,255	3778	1391	97	146	243	5,413		
Hotel Person Trips	310	261	Rooms	97	67	164	114	109	223														
less internal capture				0	(11)	(11)	(25)	(17)	(42)														
Hotel External Person Trips				97	56	153	89	92	181	114	30	3	6	9	153	135	35	4	7	11	181		
Total Proposed External Auto-Driver Trips																							
General Office	710	26,260	SF	37	6	43	3	18	21														
Mid-Rise	221	717	DU	64	181	245	99	64	163														
General Retail	820	1,548,079	SF	543	333	876	1,813	1,965	3,778														
less pass-by (34% PM/26% SAT)							(616)	(668)	(1,285)														
Retail Non-Pass-by Trips							1,197	1,297	2,493														
Hotel	310	261	Rooms	67	47	114	69	66	135														
Total Proposed External Trips				711	567	1278	1,984	2,113	4097														
Total Proposed External Auto-Driver Non-Passby Trips				711	567	1278	1,368	1,445	2812														
APPROVED PROGRAM																							
Total Built	820	1,342,550	SF	749	459	1208	2,126	2,304	4,430														
less pass-by (34% PM/26% SAT)							(723)	(783)	(1,506)														
Total Existing New Trips				749	459	1208	1,403	1,521	2,924														
Total Approved	820	1,767,177	SF	986	604	1590	2,799	3,033	5,832														
less pass-by (34% PM/26% SAT)							(952)	(1031)	(1983)														
Total Previously Approved New Trips				986	604	1590	1,847	2,002	3,849														
REMAINING APPROVED TRIPS				237	145	382	444	481	925														
Comparison																							
NET NEW TRIPS (Proposed - Existing)				-38	108	70	-36	-76	-111														
Remaining Approved Trips - NET				275	37	312	480	557	1037														

Note:

1. Trip Generation based on rates and equations established in the ITE Trip Generation Manual 10th Edition
2. ITE Vehicle-Trip Generation Rate Adjustment Factors and mode splits used for Potomac Area
3. Person Trips converted based on MNCPPC adjustment factors.
4. Internal trip reductions calculated based on ITE rates and methodology.







### Urban Plaza

- Service Area: Sector Plan
- Main program: Public use space integrated into commercial or mixed-use development, to serve as focal point for community activity.
- Key Features: Central hardscape as focal point, with seating, trees and shade structures. Defined by building walls containing ground floor activating uses. Include visitor amenities and interactive public art. Design as inclusive space for all ages.
- Site Placement: Locate in area of highest concentration of commercial and civic uses. Should be centrally placed and highly visible from the main street frontages.
- Size: ½ acre minimum, 1 acre ideal



Seating areas with shade structures along the edges



OR APPROPRIATE  
SIZE AND SCALE  
TO COMPLEMENT  
THE PROJECT  
MASTERPLAN

Urban Plaza with central hardscaped area surrounded by active ground floor uses

### Urban Recreational Park

- Service Area: Sector Plan and beyond.
- Main Program: Local and regional destination with a focus on active play.
- Key Features: Primarily recreational program such as a playground, a basketball court, a dog park/spot or a skate park/spot. Design as inclusive space for all ages.
- Site Placement: Locate near community facilities such as schools, libraries etc. when possible. Should be highly visible from the main street frontages.
- Size: varies based on community served.



Play courts for active recreation



Active recreation facilities along a walking path



# Introduction

The Rock Spring Sector Plan envisions three distinct mixed-use districts connected by a Central Spine, which includes the proposed North Bethesda Transitway. The 2013 Functional Plan recommends four potential bus rapid transit stations along the central spine, which will become nodes for concentrated development set within walkable and bikeable streets. The three districts are:

- Rock Spring East/Village Center, which includes the properties east of Rockledge Drive/Rockledge Boulevard.
- Rock Spring Central/Mixed-Use Business Campus, which includes the office park, located between the I-270 spur and Rockledge Drive.
- Rock Spring West/Mixed-Use Regional Marketplace, which includes the regional mall and retail uses west of the I-270 spur and north and south of Westlake Terrace.

Note: The Sector Plan recommends that every development proposal within this Sector Plan Area should be evaluated for the provision of a school site or recreational fields. The urban design recommendations for districts and key properties within the master plan do not cover the provision of a school site. General principles for providing a school and / or recreational fields are covered in the Vision Chapter under Urban Design Principles. The layout of the school / recreational fields, if provided, will be evaluated during the regulatory review or mandatory referral process, in coordination with MCPS.

## Urban Design Opportunities

- Large sized properties can accommodate a broad range of interventions, including infill, adaptive reuse and tear-down-and-rebuild projects.
- Underutilized assets like swaths of land currently used for surface parking, general landscaping and surface stormwater facilities can support substantial infill development.
- Well-built, Class A office buildings have adequate structural strength to undergo extensive renovations and adaptive reuse operations.
- Plan area is near local and regional parks.
- Plan area consists of large parcels that are undeveloped and large users that are in the process of vacating existing facilities, creating opportunities for large scale transformation.

## Urban Design Challenges

- Wide roads that make it hard to move around on foot or bike.
- Large concrete office buildings are expensive to tear down, making rebuild scenarios challenging.
- Large office building floorplates make conversion to residential uses difficult.
- Retail uses while performing well, are isolated and difficult to access on foot or by bike.



*Well-built, Class A office buildings have adequate structural strength to undergo extensive renovations and adaptive reuse operations.*



*Underutilized assets like swaths of land currently used for surface parking, general landscaping, and surface stormwater facilities can support substantial infill development.*

**THE DESIGN GUIDELINES  
SHOULD FACILITATE ACCESS TO  
RETAIL USES FOR ALL METHODS  
OF TRANSPORTATION -  
INCLUDING AUTOS**



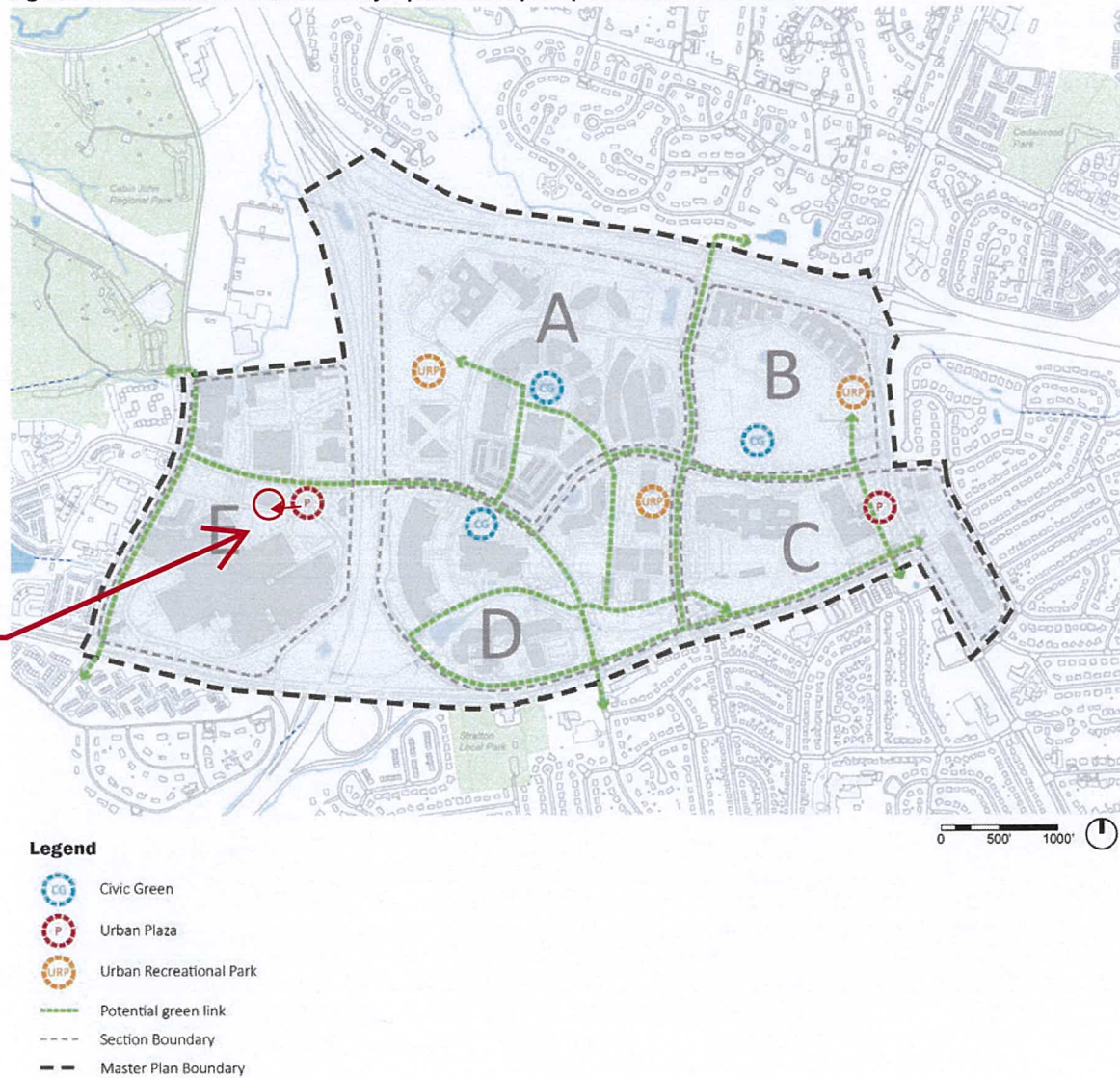
## Park, Trail, and Open Space System

The following outlines parks, trails, and open space goals for the Plan area, as envisioned by the Sector Plan:

- Increase the amount of publicly accessible green and open spaces within the Plan area, including privately owned public spaces and public parkland.
- Improve the utility of existing publicly accessible open spaces.
- Strengthen pedestrian and cyclist connections to parkland and trail networks surrounding the Plan area.
- Improve pedestrian and cyclist connections between existing and proposed open spaces within the Plan area.

SHIFT PLAZA LOCATION

Figure 3.9: Recommendations for major parks and open spaces within the Plan area





### 3.3 District: Rock Spring West

This district includes properties located west of the I-270 spur and north and south of Westlake Terrace. The area is linked to the office park by Westlake Terrace/Fernwood Road, which bridges the I-270 spur. This district comprises destination retailers, with Westfield Montgomery Mall located on the south side of Westlake Terrace. Across from Westfield Montgomery Mall, on the north side of Westlake Terrace, there is a Home Depot, as well as automobile sales and service uses, including Jim Coleman Toyota/Infinity/Cadillac, and the former site of Ourisman Ford.

Infill and redevelopment within this district should:

- Supplement existing retail uses by introducing compatible uses including residential, hotel and new format office uses such as co-working and incubator spaces.
- Focus new development intensity along Westlake Terrace and prioritize its transformation into a pedestrian-friendly environment.
- Infill development should be designed in a way that fronts on to the network of existing and proposed streets, while creating connections between existing uses and these street frontages.
- Create highly visible open spaces for public use along the Central Spine and streets that are easily accessible to workers, residents, and neighboring communities.
- Enhance the existing intersections along Westlake Terrace and Westlake Drive to improve crossing conditions for pedestrians, improve access to Cabin John Regional Park, and improve connectivity between north and south areas of this district.

THE DESIGN GUIDELINES  
SHOULD FACILITATE  
ACCESS TO RETAIL USES  
FOR ALL METHODS OF  
TRANSPORTATION -  
INCLUDING AUTOS

*Infill development around the Pentagon City Mall seamlessly connects to surrounding community through a central open space*





STREET FRONTING RETAIL HERE  
WILL NOT BE VIABLE  
STREET IS TOO WIDE AND TOO  
BUSY  
GRADES DON'T WORK AND NO  
PARKING TO SUPPORT RETAIL

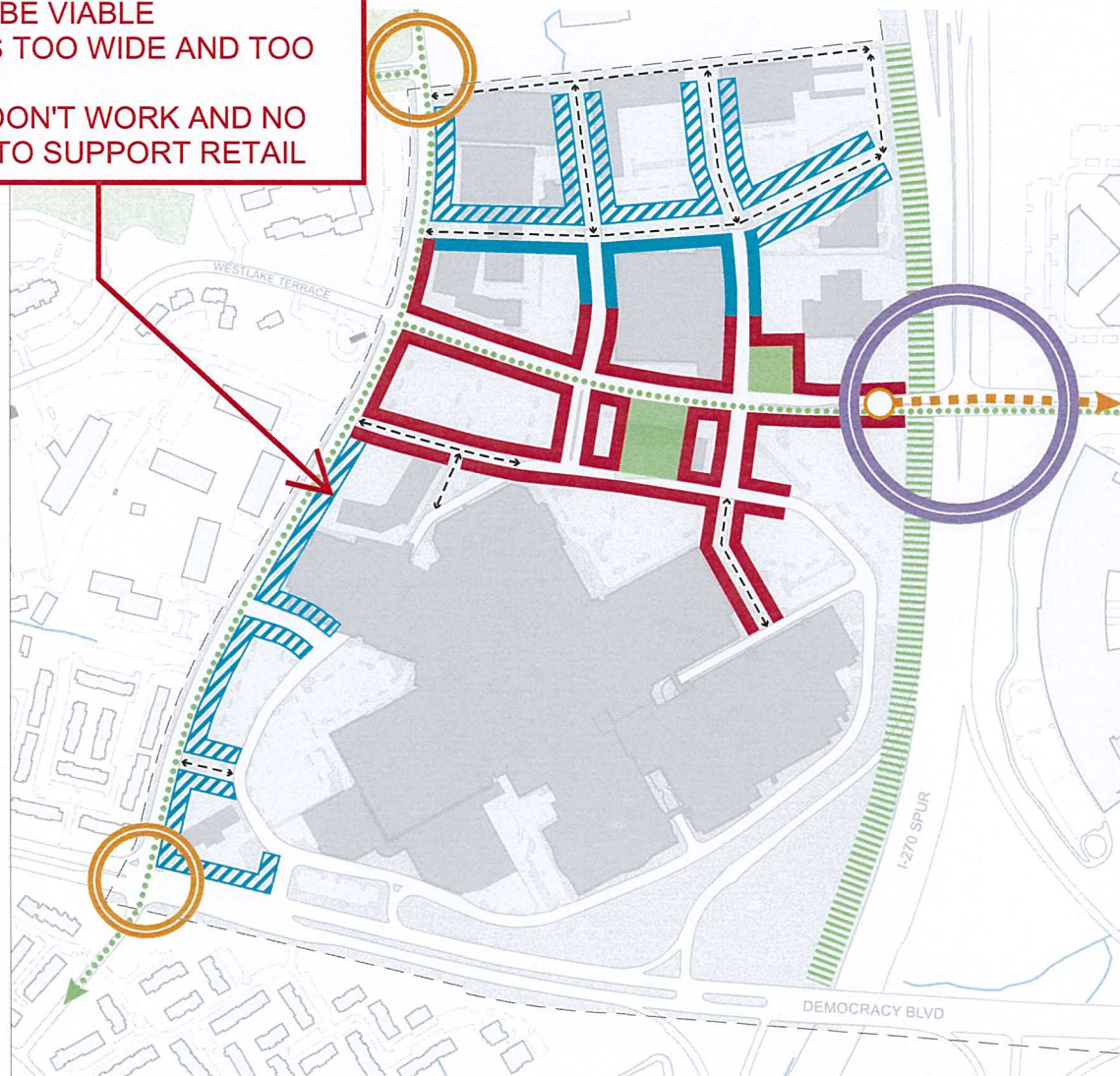


Figure 3.30: Rock Spring West Concept Diagram

#### LEGEND

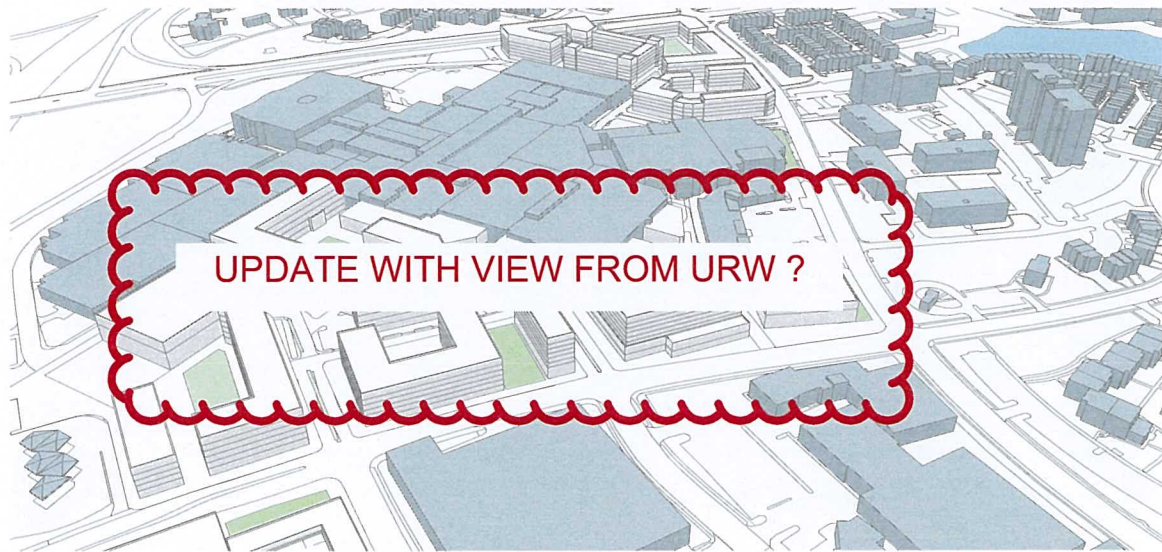
- Potential Road
- Build to line with activated ground floor
- Build to line
- ▨ Built to area
- Recommended Urban Plaza
- ... Green Link
- ||| Green Buffer
- - - Proposed BRT Line
- Proposed BRT Stop
- ⊙ Enhanced Intersection
- ⊙ Potential Gateway

Note: Diagrams are for illustrative purposes only. Actual site and building design will be evaluated during the regulatory review process

## Westfield Montgomery Mall

This site includes the Westfield Montgomery Mall, a small shopping center called Westlake Crossing, and a gas station. As a means to continue expanding the regional shopping mall, possible additions to Westfield Montgomery are being explored by the owner, including residential uses and / or a hotel. Such development at the mall site should address the following guidelines:

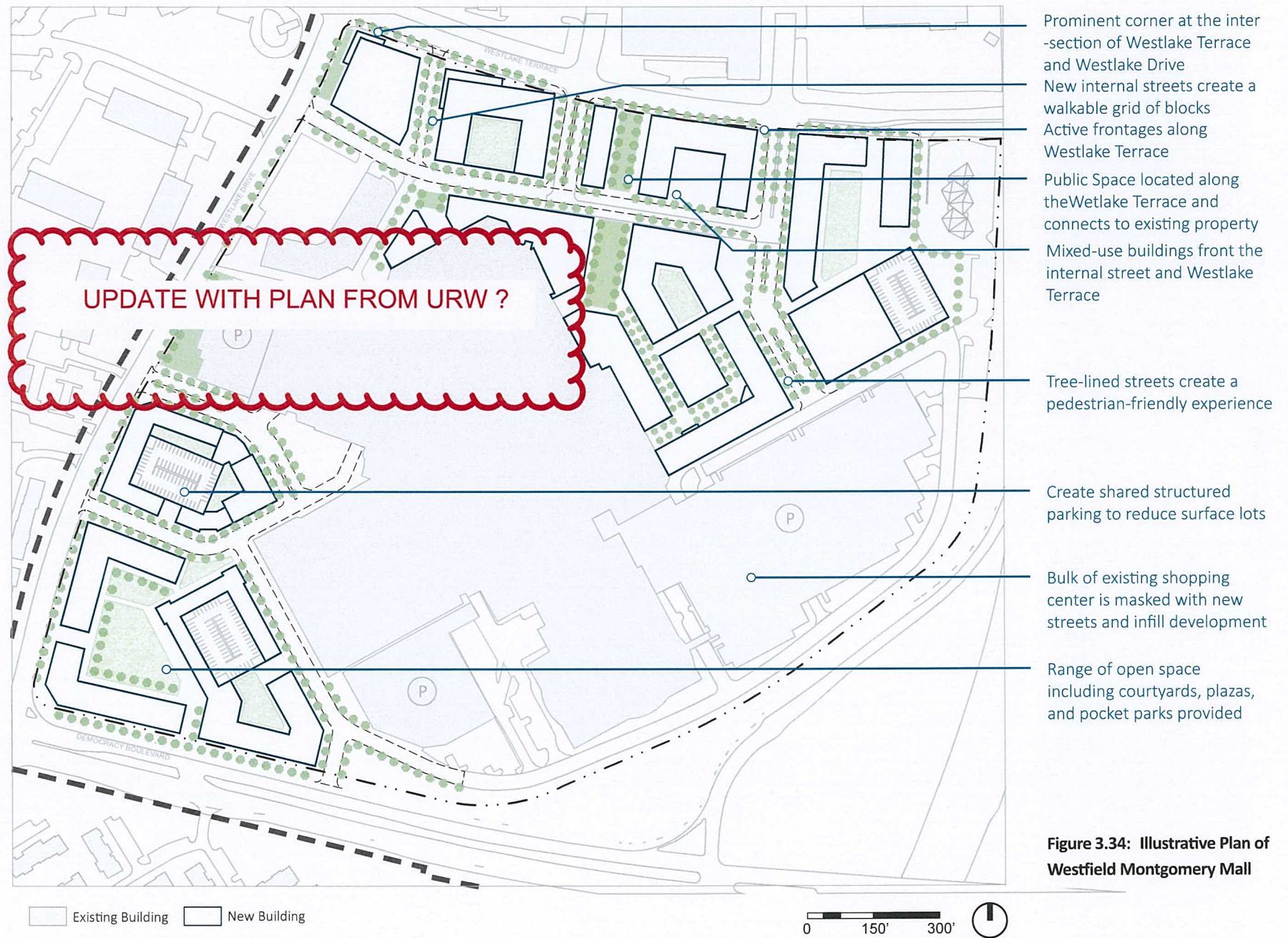
- New buildings should front Westlake Terrace with active uses, frequent entrances and provide direct connections through pedestrian friendly spaces to the existing mall uses.
- Extend Autopark Avenue and Motor City Drive through the site to create compact blocks that expand the existing street grid.
- Create open spaces lined with active uses that front on to Westlake Terrace.
- New development should create an architecturally significant corner at the intersection of Westlake Terrace and Motor City Drive.
- New development should create a strong pedestrian connection to the transit center.
- Coordinate the frontage along Westlake Terrace to incorporate the design for the future BRT connection and recommendations from the Countywide bicycle masterplan.



**Figure 3.33: Illustrative Concept Drawing of Westfield Montgomery Mall**

*Note: Diagrams are for illustrative purposes only. Actual site and building design will be evaluated during the regulatory review process*





**Figure 3.34: Illustrative Plan of Westfield Montgomery Mall**

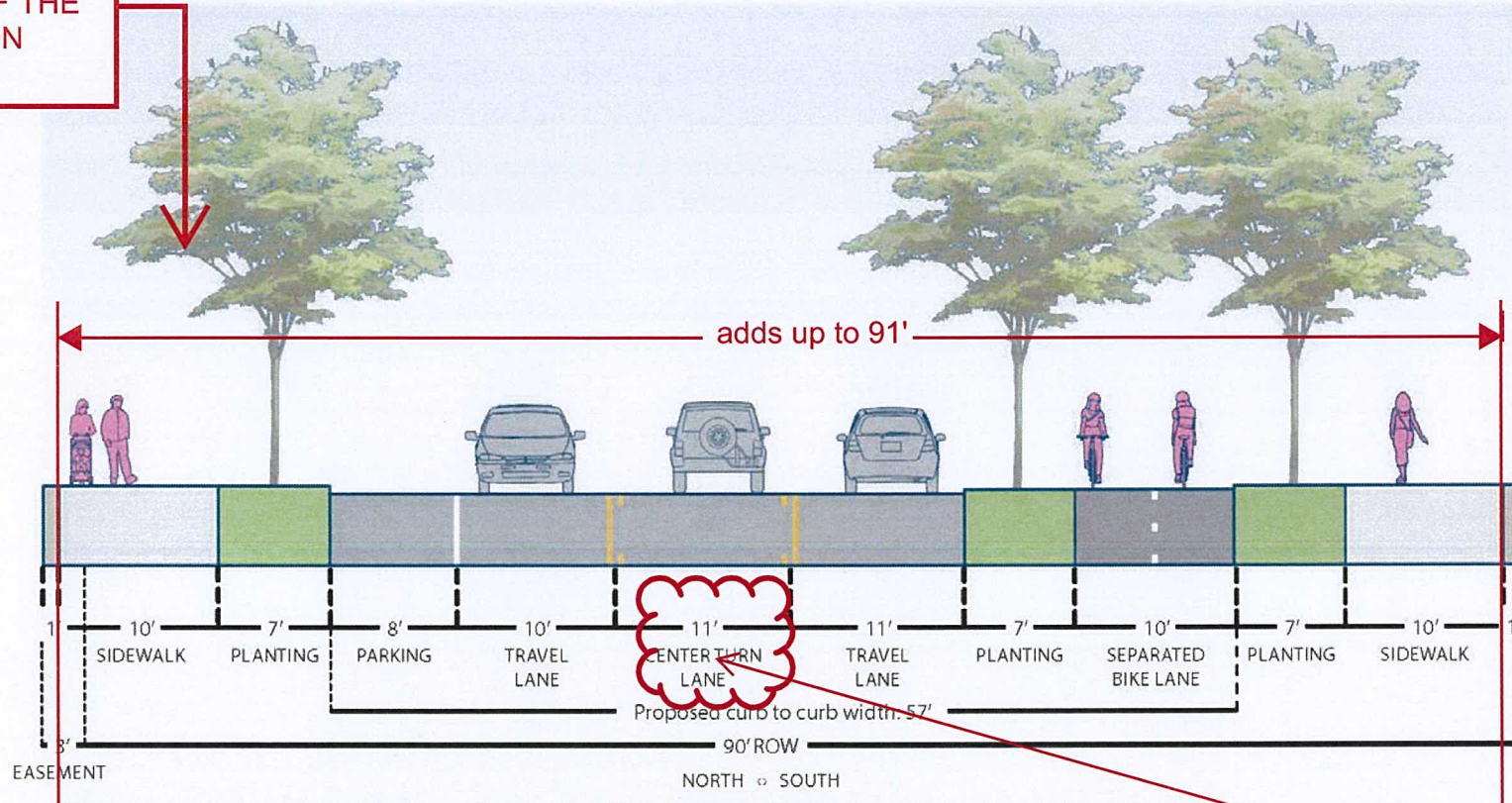
*Note: Diagrams are for illustrative purposes only. Actual site and building design will be evaluated during the regulatory review process*



THIS SHOULD BE THE MALL SIDE OF THE SECTION

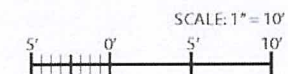
WESTLAKE TERRACE  
off City Drive

Rock Spring Sector Plan ②



- The sector plan calls for concentrated development intensity along Westlake Drive and Westlake Terrace and proximate to the transit center on the west side. To the extent possible, the goal is to activate the frontage of Westlake Terrace.
- This section includes the recommendation from the Sector Plan for a "road diet" that would reconfigure the street from four to three travel lanes. Detailed evaluation is needed to confirm the feasibility of this concept.
- The Bicycle Master Plan recommends a two-way separated bike lane on the south side of the street.
- The future cross section will need modifications at the bridge over I-270, where the right of way decreases to 80'.
- An additional 3' is required on the north side of Westlake Terrace, west of Motor City Drive. This should be acquired through easements when properties on the north side redevelop.

WHAT IS THE PROPOSED INTERIM CONDITION UNTIL THE 3' EASEMENT IS ACQUIRED?  
PLEASE DEPICT IN THE GUIDELINES



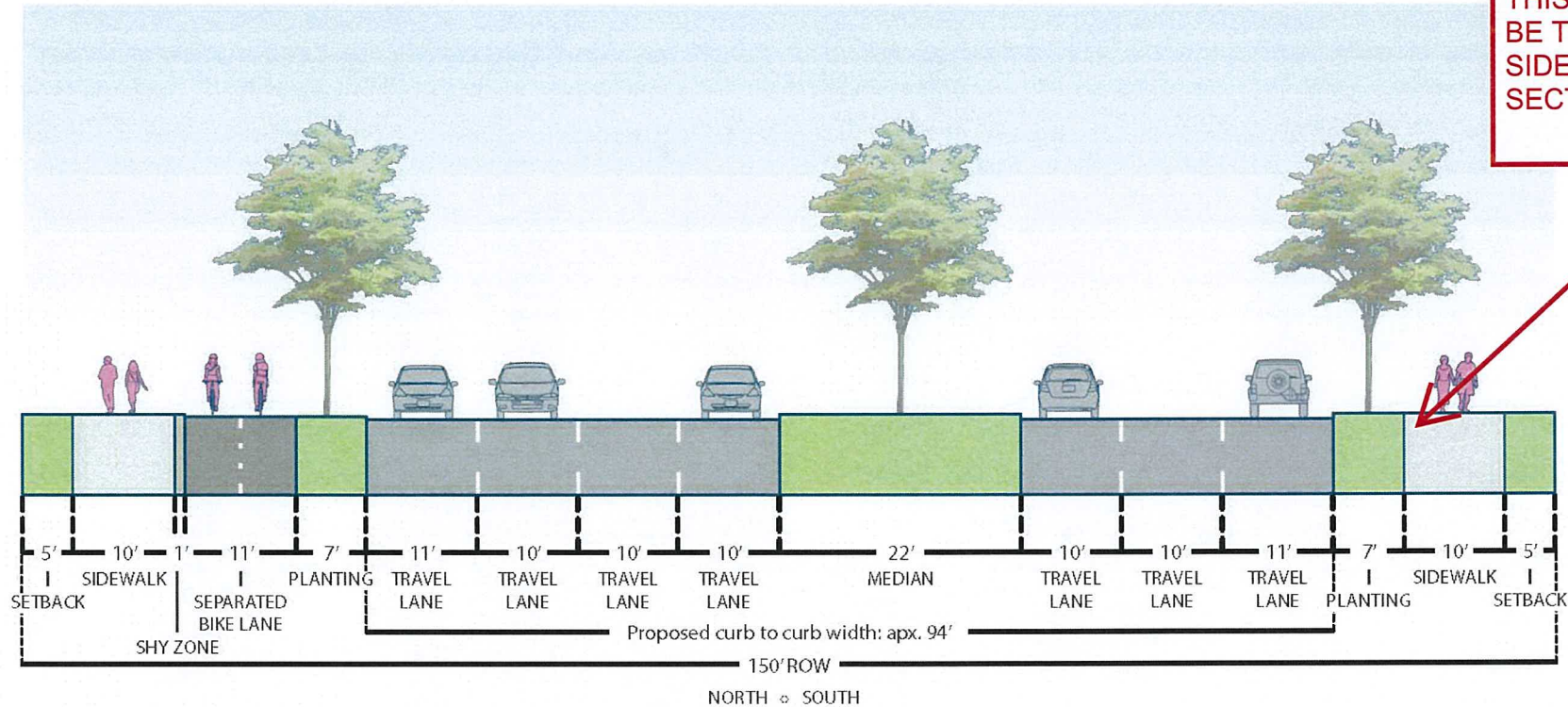


# DEMOCRACY BOULEVARD

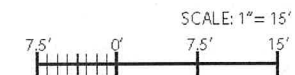
Westlake Drive to Bells Mill Road

⑥  
Rock Spring Sector Plan

THIS SHOULD  
BE THE MALL  
SIDE OF THE  
SECTION



- The existing curb-to-curb width varies from approximately 100' near I-270 to approximately 90' at Old Georgetown Road.
- The Bicycle Master Plan recommends a breezeway on the north side of the street. Specifically, a shared use path.
- The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.
- The setback may contain buildings, hardscape, or landscape depending on the context.



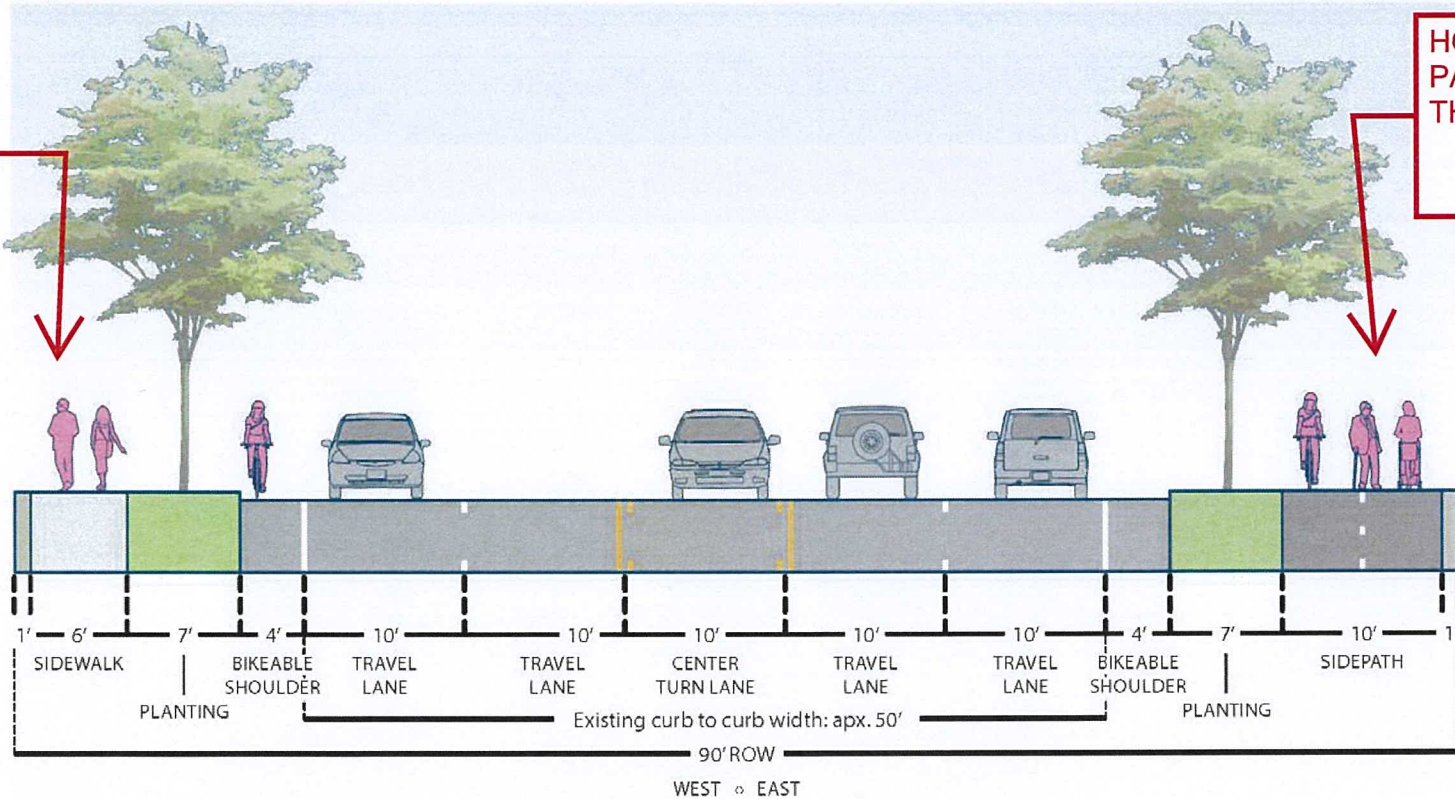
# WESTLAKE DRIVE

Democracy Boulevard to Westlake Terrace

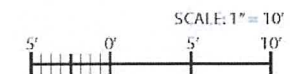
Rock Spring Sector Plan ⑦

THIS SHOULD  
BE THE MALL  
SIDE OF THE  
SECTION

HOMES AND  
PARK ARE ON  
THIS SIDE



- The Bicycle Master Plan calls for a sidepath on the east side and bikeable shoulders.
- The Sector Plan recommends reclassification from a two-lane primary residential to a two-lane minor arterial.
- As an interim condition, this section could be implemented within the existing curb-to-curb width if the bikeable shoulders were eliminated.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.



Law Offices Of  
**MILLER, MILLER & CANBY**  
**MM&C**  
CLIENT FOCUSED. RESULTS DRIVEN.

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200-B MONROE STREET, ROCKVILLE, MARYLAND 20850 P: 301.762.5212 F: 301.762.6044 WWW.MILLERMILLERCANBY.COM

All attorneys admitted in Maryland and where indicated.

PATRICK C. MCKEEVER  
JAMES L. THOMPSON  
LEWIS R. SCHUMANN  
JODY S. KLINE  
JOSEPH P. SUNTUM  
ROBERT E. GOUGH

DONNA E. MCBRIDE (DC)  
GLENN M. ANDERSON (FL)  
SEAN P. HUGHES (DC)  
CATHY G. BORTEN (DC)  
MICHAEL G. CAMPBELL (DC, VA)

SOO LEE-CHO (CA)  
DAVID A. LUCAS (DC)  
DIANE E. FEUERHERD  
CHRISTOPHER L. YOUNG (VA)  
CALLIE CARNEMARK (VA)  
JAMES T. ROTH

[SLCHO@MMCANBY.COM](mailto:SLCHO@MMCANBY.COM)

May 9, 2019

Casey Anderson, Chair  
Montgomery County Planning Board  
8787 Georgia Avenue  
Silver Spring, MD 20910

RE: Urban Design Guidelines for Rock Spring and White Flint 2 Sector Plans;  
Comments re Loehmann's Plaza Site Related Recommendations (Randolph Hills  
District); 5200-5290 Randolph Road

Dear Chair Anderson and Members of the Planning Board:

This office represents Mr. Rob Rosenfeld and Rosenfeld Investment LLC, the owners of property located at 5200-5290 Randolph Road, commonly known as Loehmann's Plaza.

First, on behalf of our clients, thank you for this opportunity to provide comments on the Draft Urban Design Guidelines for Rock Spring and White Flint 2 Sector Plans ("Draft Guidelines"). We agree with the Draft Guidelines that due to its prominent corner location at the intersection of Randolph Road and Parklawn Drive – redevelopment of the Loehmann's Plaza site presents a unique opportunity to "establish an architectural gateway for the area." (Draft Guidelines, pg. 103).

We would also note that much of the Draft Guideline's recommendations and figures depicting a potential future redevelopment concept for the Loehmann's Plaza site appear to be derived from the preliminary layouts/concepts that the property owner's design team had developed and shared with Planning Board Staff during the review/adoption of the White Flint 2 Sector Plan ("Sector Plan"). In particular, the location of the "civic green" is depicted and repeatedly described on pages 102-104 of the Draft Guidelines as a "centralized" public open space that is insular to the site. This is not inconsistent with what the property owner's design team originally had in mind as a likely layout for the site.

Since the adoption of the White Flint 2 Sector Plan, however, the design team has continued to evaluate and evolve the initial layouts – inclusive of studying whether a “civic green” that either engages Randolph or possibly the “northwestern curve” of the property might be more preferable to being fully interior to the site. The ability to locate the “civic green” more toward the current northwestern curved portion of the site may depend on whether the recommendation found in Chapter 8: Mobility of the Sector Plan (on pg. 79-80, excerpted below) to re-align the Parklawn/Randolph intersection is implemented.

### **8.1.5 Intersections**

Roadway intersections in the Plan area should emphasize pedestrian and bicyclist accommodations while minimizing additional roadway widening in order to promote walkability and achievement of the Non-Auto Driver Mode Share (NADMS) goals. Results from the transportation forecast conducted in support of this Plan indicated that two intersections are forecast to exceed the Local Area Transportation Review (LATR) standard. Multi-modal mitigation approaches to address this situation, including trip mitigation measures to reduce vehicular demand, rather than roadway widening, should be given a high priority.

This Plan recommends the following intersection modifications:

- **Realign the curved Parklawn Drive section of the intersection with Randolph Road to form a traditional four-way intersection. Realignment on Parklawn Drive will improve pedestrian and bicyclist safety and slow vehicular traffic. It will also support the redevelopment of Loehmann's Plaza, which is located at the southeastern intersection of Parklawn Drive and Randolph Road.**



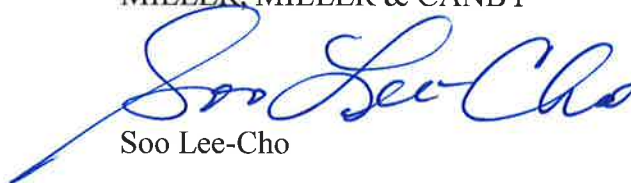
That possibility, however, has opened up some intriguing design options with respect to the overall public open space scheme for the site that the property owner would like to keep on the table. To that end, we would request consideration of the following modifications to the Draft Guidelines:

- 1) While we realize that the Draft Guidelines are just that – guidelines – and its design recommendations are not set in stone, we would nonetheless suggest that the term **“usable”** replace the terms “central” and “centralized” wherever they appear on pages 102-104 in describing the future public open space for the Loehmann’s Plaza site.
  - a. The terms “central” and “centralized” are locational in nature and quite specific such that when coupled with the depiction on Figure 4.44 on page 103, could be interpreted more literally in the future to restrict consideration of other possible alternatives as discussed herein.
- 2) In addition, we would recommend that additional text be included in Note #2 on page 103 clarifying that the location of the “civic green” as shown is ***illustrative only and is not intended to limit future design alternatives that achieve an accessible and usable public open space on the site.***

Thank you for your consideration of these comments. Attached hereto is a mark-up of pages 102-104 of the Draft Guidelines consistent with these comments.

Sincerely yours,

MILLER, MILLER & CANBY



Soo Lee-Cho

Attachment

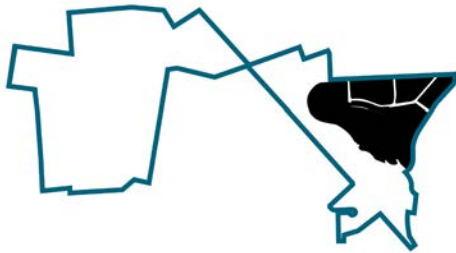
cc: Atul Sharma  
Rob Rosenfeld  
Jack Hollon  
Jim Voelzke  
Brian Szymanski

## 4.4 Randolph Hills District

This area is primarily a single-family residential subdivision anchored by a retail strip at the corner of Parklawn Drive and Randolph Road. The area also includes multi-family complexes and institutional uses. Single-family residential areas and institutional uses are not expected to change, but the retail strip has the potential to build a greater presence on Randolph Road, and to deliver amenities, connections and services to the immediately surrounding community. There is also the possibility that at least one of the multi-family complexes in the cluster might explore redevelopment, which will also create opportunities for increased connectivity through the district.

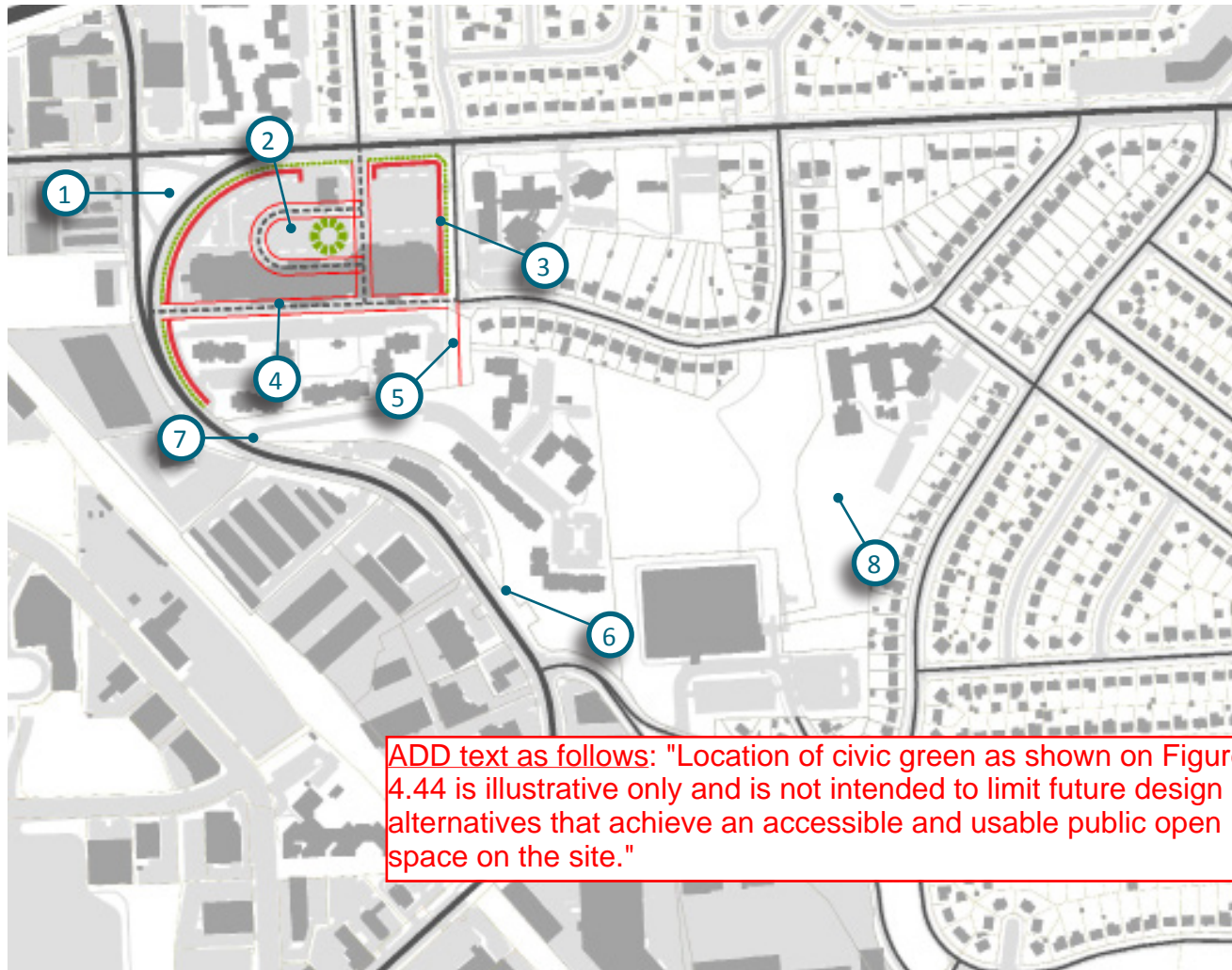
Redevelopment within this cluster should:

- Introduce a mix of uses, new connections, and public open space.
  - Focus new development intensity on the
- intersection of Randolph Road and Parklawn Drive and prioritize its transformation into a pedestrian-friendly environment.
  - Infill development should be designed in a way that fronts on to the network of existing and proposed streets, while creating connections between existing uses and these street frontages.
  - Create highly visible open spaces for public use along the Central Spine and streets that are easily accessible to workers, residents, and neighboring communities.
  - Enhance the existing intersections along Westlake Terrace and Westlake Drive to improve crossing conditions for pedestrians, improve access to Cabin John Regional Park, and improve connectivity between north and south areas of this cluster.



*Loehmann's Plaza today.*

Figure 4.44: Map 5.2.5: Randolph Hills District - Design Elements Diagram



#### LEGEND

- Build to line
- Streetscape
- ▨ Setback Area
- Existing Street
- - - Recommended Street
- - - Potential Street
- Bicycle/Pedestrian Path
- ▭ Stream Buffer
- Enhanced Intersection
- ⊗ Civic Green
- ⊗ Neighborhood Green

Replace with  
"usable"

1. Redevelopment at this location should establish an architectural gateway for the area.
2. Redevelopment should include a central public open space.
3. Development types along Putnam Road should be compatible with residential uses to the east.
4. Redevelopment should consider connections to improve mobility for all residents.
5. Redevelopment of the Oxford Square Apartments should include a potential pedestrian connection with Putnam Road.
6. Apartments redevelopment should also consider additional connections to Parklawn Drive, closer to Boiling Brook Parkway.
7. Existing entrance to Oxford Square, to remain.
8. Sector Plan recommends considering a public garden on the Grounds of the International Center.

Potential redevelopment is limited to properties close to the intersection of Randolph Road and Parklawn Drive.

ADD text as follows: "Location of civic green as shown on Figure 4.44 is illustrative only and is not intended to limit future design alternatives that achieve an accessible and usable public open space on the site."



## Key Properties

### Loehmann's Plaza

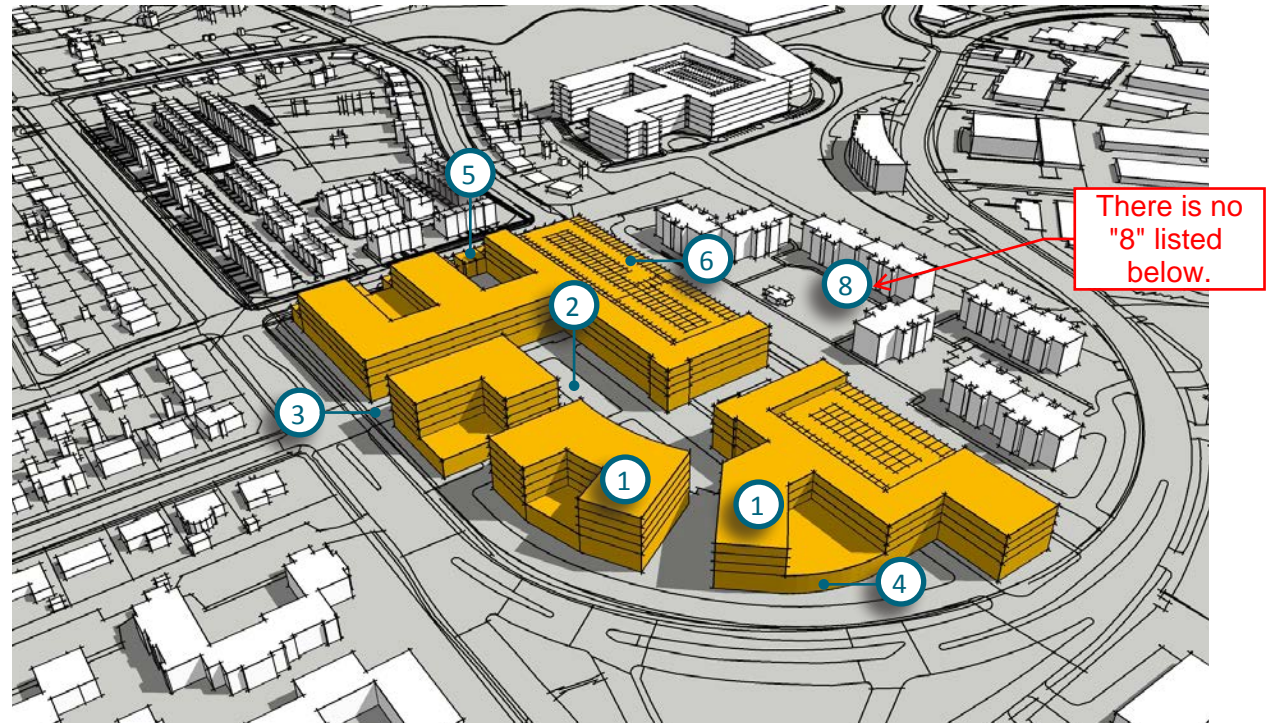
This strip center formerly anchored by a Safeway grocery store is located at a prominent corner with potential to establish an architectural presence for the cluster. Redevelopment could deliver amenities that would allow the property to continue serving as a neighborhood center into the future.

Guidelines:

- Redevelopment should create a gateway to the area at Randolph Road that integrates a possible BRT station.
- Development should improve pedestrian areas along Randolph Road and create ~~central~~ open space into the surrounding community.
- Create an accessible ~~central~~ open space within the property.
- Create active frontages around the edges of the property.

Replace with  
"usable"

Figure 4.45: Loehmann's Plaza - Potential Development



Redevelopment of this property should establish a gateway for the area with retail and residential uses.

1. Maximum building height in this area- corner of Randolph Rd. and Parklawn Drive.
2. Provide an accessible and ~~centralized~~ public open space.
3. Create through streets to improve connectivity; align with existing streets if possible.
4. Activate frontages along pedestrian areas.
5. Redevelopment should transition in scale to residential adjacent communities.
6. Conceal parking structures.

Replace with  
"usable"




## **Memorandum**

### ***BY ELECTRONIC MAIL***

To: Atul Sharma

CC: Scott Peel  
Denise Peel  
Joshua Sloan

From: Steven A. Robins 

Date: May 13, 2019

Re: Comments on Parking Lots to Places – Urban Design Guidelines for Rock Spring & White Flint 2 Sector Plans (Draft March 2019)

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The purpose of this Memorandum is to provide Technical Staff comments on the Draft Design Guidelines for the Rock Spring & White Flint 2 Sector Plans (the "Guidelines") on behalf of Peel Properties, the owners of property located at 6006 Executive Boulevard. I also have submitted general comments related to the Guidelines as applied to both Rock Spring and White Flint 2. The one comment that must be carried forward throughout the Guidelines is the need for flexibility. This Memorandum addresses comments related to 6006 Executive Boulevard, located in the Executive Boulevard District.

1. P. 88 – We fully support the concept of transforming single-use districts into mixed-use districts.
2. P. 91 – Figure 4.38 shows potential interior connections running horizontally and vertically through the site. This is something that we will need to review in further detail to determine whether this can be achieved, particularly with adjoining property owners. We also question the need/location for certain public open space particularly at the location shown on Figure 4.38. There are three public open spaces shown on three adjoining properties, and it doesn't appear if any are shown on the west side of Executive Boulevard (recognizing that there is a



civic green on the west side).

3. P. 94 – The Guidelines discuss attempting to link properties in the Executive Boulevard District with adjacent single-family neighborhoods to the south. The Guidelines should recognize that a stream separates these two areas.
4. P. 95 – Figure 4.39, we offer the same comment as above regarding the neighborhood greens.
5. P. 96 – Figure 4.40, please take a look at the scale of the drawing. The buffer to the east appears larger than that evaluated as part of the Sector Plan.
6. We continue to evaluate the various street sections contained in the Guidelines.

Thank you for consideration of our comments specific to 6006 Executive Boulevard. I am sure that as this process continues, we will be in a position to offer additional comments. In the meantime, feel free to contact me or others on our team and we would be happy to discuss this matter in further detail.

Steve





**MEMORANDUM**

**By E-mail and First Class Mail**

[Atul.Sharma@montgomeryplanning.org](mailto:Atul.Sharma@montgomeryplanning.org)

**To:** Mr. Atul Sharma, Maryland National-Capital Park and Planning Commission,  
Planning Staff, Area 2  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

**From:** Stuart R. Barr, Lerch Early & Brewer, Chtd.

**Date:** May 24, 2019

**Re:** Home Depot Bethesda Store – 7111 Westlake Terrace, Bethesda, Maryland 20817  
10410 Auto Park Avenue, Bethesda, Maryland 20817 (SDAT address)  
Parcel N436, Tax Map GP43, Plat 13039 (7.51 acres; Tax ID #10-02005743)

Comments Regarding Proposed Rock Spring Sector Plan Urban Design Guidelines

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**Introduction and Background Information**

On behalf of our client Home Depot USA, Inc. (“Home Depot”), the owner of the property located at 7111 Westlake Terrace, Bethesda, Maryland 20817 on the north side of Westlake Terrace in between Auto Park Avenue and Motor City Drive (the “Property”),<sup>1</sup> we submit these comments on the proposed Urban Design Guidelines for the Rock Spring Sector Plan. The Property is approximately 7.51 acres in size and is identified as Parcel N436, Tax Map GP43 (7.51 acres; Tax ID #10-02005743). It was previously zoned C-2 and is currently zoned CRT (Commercial Residential Town) 2.25, C-1.5, R-0.75, H-75 Commercial Base.

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<sup>1</sup> The store address is 7111 Westlake Terrace, Bethesda, Maryland 20817. The Maryland State Department of Assessments and Taxation reflects the address as 10410 Auto Park Avenue, Bethesda, Maryland 20817.

The Property is improved with a one-story Home Depot home improvement retail store on the south side of the Property (approximately 109,000 square feet in size), additional retail on the north side with various tenants, and associated surrounding surface parking spaces. Access to the Property is provided from both Auto Park Avenue and Motor City Drive. The Pepco Bells Mill Substation located in the R-90 zone adjoins the Property to the north. The Westfield Montgomery Mall shopping center in the GR (General Retail) zone adjoins the Property to the south across Westlake Terrace. The Property is surrounded by commercial uses on the west and east (along with a U.S. Post Office building) in the CRT and Employment Office zones.

### **General Comments and Preferences**

The Bethesda Home Depot store has always been in very high demand. To meet the challenge from the significant customer demand, Home Depot's goal over the years has been to improve the customer's shopping experience and specifically, to improve vehicle circulation and make more parking spaces readily available. Parking and vehicle circulation are at such a premium that Home Depot recently removed approximately 16,000 square feet of retail space on the north side of the Property just in order to reconfigure and increase the total number of parking spaces on the Property. The Planning Board approved that Site Plan Amendment last year (Plan Number 81980017A). In connection with that Site Plan Amendment and in recognition of the fact that a Home Depot retail store does not generate any meaningful volume of pedestrian or bicycle traffic, the Planning Board granted a partial waiver of bicycle and motorcycle stall requirements.

Home Depot generally opposes any changes that would reduce the vehicular transportation capacity within the surrounding area, would reduce the ability of vehicles to enter or exit the Property or circulate within the immediate area, or would reduce the amount of parking surrounding the store. Given the nature of the store, Home Depot does not generate any meaningful volume of bicycle or pedestrian traffic either from customers or employees given the types of products sold and the nature of the business conducted at the store. The retail uses on the north side of the Home Depot property also historically have not generated any meaningful volume of bicycle or pedestrian activity. We believe the same is true for the Post Office property and virtually all of the other surrounding uses.

With that general context, Home Depot offers the following specific comments on the draft Rock Spring Urban Design Guidelines (the "Guidelines"):

**Westlake Terrace (Guidelines, page 76)**

Westlake Terrace next to the Home Depot store currently contains two westbound lanes, two eastbound lanes, and a center turn lane. The Guidelines recommend a reconfiguration to one westbound, one eastbound, and a center turn lane (a reduction of two lanes, one in each direction). Home Depot does not support the elimination of vehicle travel lanes, which are necessary for customers to get in and out of the store. Additionally, the Home Depot store delivery/loading area faces Westlake Terrace. While there is some space within the loading area behind the store, delivery trucks occasionally need to stop and wait temporarily on Westlake Terrace. Currently, since there are two westbound lanes, vehicles can use the other available lane if the lane closest to the store is occupied by a delivery truck. The elimination of a westbound lane would create a much more difficult condition under these circumstances. We ask that the Guidelines recommend continuing the existing number of vehicle lanes for Westlake Terrace.

**Motor City Drive (Guidelines, page 84)**

For Motor City Drive, the Guidelines propose a 11' northbound travel lane, a 15.5' southbound travel lane, and parking, planting strip, and sidewalk on either side. Home Depot supports the wider southbound travel lane, given the nature of the vehicles using that lane. Home Depot also does not oppose the proposed Motor City Drive street section provided it does not change the existing conditions. Currently, the west side of Motor City (the east side of Home Depot's building) has a sidewalk, grass strip, and then parking alongside Motor City for about two-thirds of the northern side of the Home Depot building. As a vehicle approaches the Westlake Terrace intersection from Motor City, parking is no longer available and there are no parking signs. Motor City then provides a left turn lane and a through/right turn lane at Westlake Terrace. What is unclear about the proposed street section from the Guidelines is whether it is proposing to change the existing condition of Motor City. Home Depot supports the continuation of the existing conditions on the west side (Home Depot side) of Motor City.

Most importantly, changes need to be made to the Westlake Terrace/Motor City Drive traffic signal. Currently, vehicles attempting to turn eastbound (left turn movements) from Motor City on to Westlake Terrace experience unreasonable queuing delays because there is not a dedicated left turn signal, and vehicles have to yield to vehicles exiting the Mall property. Motor City Drive will become even more important and this situation will be exacerbated further once the Ourisman property redevelops and additional vehicles need to



access Westlake Terrace from Motor City Drive. Thus, Home Depot strongly encourages the County to modify the Westlake Terrace/Motor City Drive traffic signal to allow cars to exit Motor City on to Westlake Terrace more efficiently and avoid unreasonable delays.

### **Auto Park Avenue (Guidelines, page 85)**

The section of Auto Park Avenue next to the Home Depot store currently allows on-street parking for most of the length of the store, similar to Motor City Drive. The Guidelines effectively propose to replace the on-street parking with a separated bicycle lane. As mentioned, the Home Depot store and other retail on the Property do not generate enough bicycle traffic to warrant a bicycle lane at this location. We do not envision bicyclists using a bicycle lane along Auto Park and it would have no connectivity. The existing sidewalk and planting strip along Auto Park, which are in good condition and function adequately for all purposes, can accommodate any light pedestrian or bicycle activity safely and efficiently along the Home Depot frontage. Thus, Home Depot supports maintaining the existing condition and does not support the elimination of the on-street parking on Auto Park Avenue.

### **Conclusion**

Home Depot recognizes the general objectives of the Sector Plan and Guidelines. But Home Depot is constantly striving to meet the challenge of the public's demands on the store and enhance the customer's shopping experience. Simply put, that experience primarily depends on efficient vehicle circulation and parking. Please do not change Westlake Terrace, Motor City Drive, or Auto Park Avenue so as to reduce vehicle circulation and parking or increase vehicle congestion or delays.

We appreciate the Staff's and Board's consideration of Home Depot's position on the proposed Guidelines. If you have any questions or need any additional information, please do not hesitate to contact us. Thank you very much.

### **Attachments:**

1. Westlake Terrace (Guidelines, page 76)
2. Motor City Drive (Guidelines, page 84)
3. Auto Park Avenue (Guidelines, page 85)

cc (by e-mail): Gwen Wright, Planning Director  
Carrie Sanders, Chief, Area 2 Division

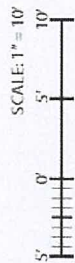
WESTLAKE TERRACE  
West of Motor City Drive

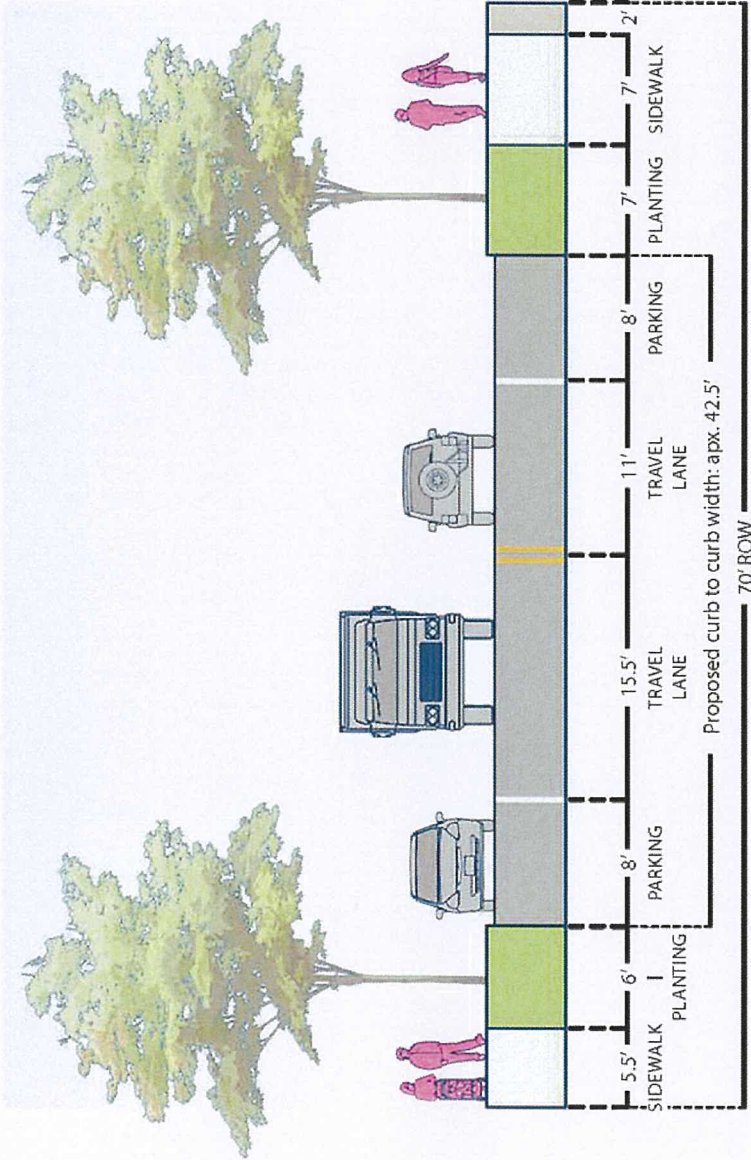
Rock Spring Sector Plan



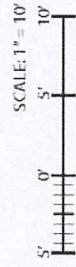
NORTH ◊ SOUTH

- The sector plan calls for concentrated development intensity along Westlake Drive and Westlake Terrace and proximate to the transit center on the west side. To the extent possible, the goal is to activate the frontage of Westlake Terrace.
- This section includes the recommendation from the Sector Plan for a "road diet" that would reconfigure the street from four to three travel lanes. Detailed evaluation is needed to confirm the feasibility of this concept.
- The Bicycle Master Plan recommends a two-way separated bike lane on the south side of the street.
- The future cross section will need modifications at the bridge over I-270, where the right of way decreases to 80'.
- An additional 3' is required on the north side of Westlake Terrace, west of Motor City Drive. This should be acquired through easements when properties on the north side redevelop.





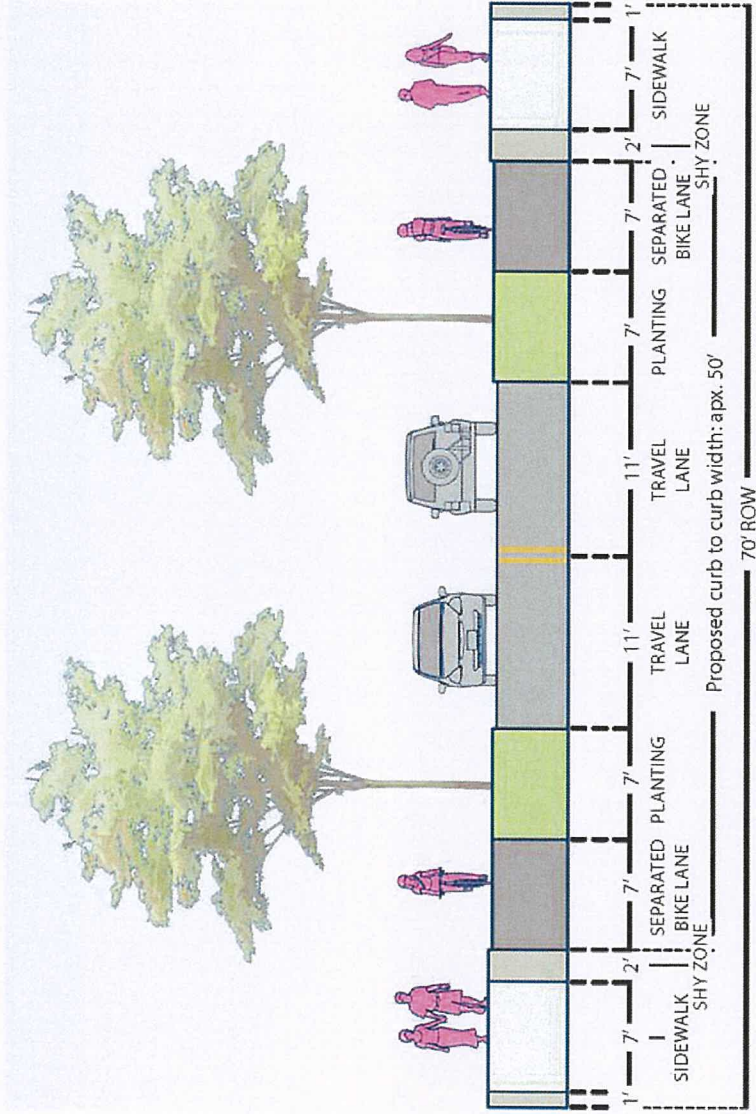
- The southbound travel lane width is provided to accommodate commercial truck serving businesses here.





# AUTO PARK DRIVE/OTHER STREETS

Rock Spring Sector Plan



- This cross section is intended for new, proposed east-west and north-south streets in the area. It assumes a 70' right of way for these streets, and buffered or separated bike lanes.





May 30, 2019

VIA ELECTRONIC DELIVERY

Casey Anderson, Chair  
Montgomery County Planning Board  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

Dear Chair Anderson and Members of the Board:

On behalf of Unibail-Rodamco-Westfield (“URW”) the owner of Westfield Montgomery Mall (the “Property”), we wanted to take this opportunity to provide written comments on the draft Rock Spring Urban Design Guidelines and to request the opportunity to speak at the upcoming Planning Board worksession on June 6.

I. Introduction

The Westfield Mall Property is zoned GR 1.5, H-45 and is subject to the Regional Shopping Center overlay zone. Unlike the majority of the sites within the Rock Spring Sector Plan area that were zoned CR, the Property was zoned GR in recognition of its use as a shopping mall. The Property is currently improved with over 1.2 million square feet of retail uses and is one of only two regional malls in Montgomery County. Since 2016 URW has been pursuing the redevelopment of a portion of the Property to accommodate a mixed use component, including an additional 275,000 of net new square feet of lifestyle retail uses, up to 717 residential units, a hotel and a small office component (the “Project”).

URW’s objective in pursuing the Project is to ensure that the Mall remains relevant by introducing the mixed use component to the Property. At the same time, URW’s number one objective is to protect the existing retail asset. The Mall has existed for over 50 years and will continue to function as a mall with the addition of the proposed development. It is through this lens - the protection of the existing asset - that URW has pursued the Project. Over the past three years, URW has worked closely with M-NCPPC Staff to ensure the success of the proposed development, while at the same time protecting the existing Mall asset.

II. Comments on Design Guidelines

A. Westlake Terrace Right-of-Way

The draft Rock Spring Design Guidelines recommends reducing the number of lanes within the Westlake Terrace right-of-way section from four through lanes to two through lanes and preserving the turning lane (the “Road Diet”). As URW’s traffic study demonstrates, this

reduction in through lanes from four to two will significantly impact access to the Mall Property. Accordingly, URW is appreciative of Staff's recognition that the Road Diet will adversely impact the Mall. It is our understanding that Staff will recommend to the Planning Board that the ultimate Westlake Terrace section fronting the Property be determined at the time of the approvals for the proposed Project. Moreover, Staff supports the retention of the existing lanes in connection with the development of the initial phases of the Project but will recommend that URW be required to restudy the Road Diet concept in connection with the later phases of development.

At the same time, Staff has indicated that to the extent the existing paving section (i.e. the four through lanes and the turning lane -- the "Cartway") remains as is, the streetscape along the Mall's frontage must be highly attractive and inviting to pedestrians and cyclists. URW believes that, while its proposed section outside the Cartway varies from Staff's in two respects (See Attachment A), it nonetheless achieves Staff's objectives and URW urges the Planning Board's support of URW's proposed section. The highlights and justification for URW's Westlake Terrace section outside the Cartway (i.e. from the curb of the southern road lane to the property line) are as follows:

- 6.7 foot wide planting strip -- The 6.7 foot wide planting strip meets DOT requirements and will comfortably accommodate the proposed standard street trees that will provide desired shade along the bike path and at the same time visually enhance Westlake Terrace.
- 10 foot wide separated bike lane -- In keeping with the width of the originally proposed separated bike lane, the proposed section maintains the 10 foot wide lane.
- "Shy Zone" -- The purpose of this one foot concrete divider "shy zone" is to ensure that the bike lane is separated from the pedestrian zone. This is a well-accepted design technique with five of the 11 road sections set forth in the Design Guidelines providing a one or two foot wide shy zone (See Attachment B).

While the shy zone replaces the southern planting strip intended to accommodate street trees, the second row of trees in this location are unnecessary, and will detract from the trees URW is proposing along the streetscape on their Property. Given the Project's generous setback ranging from 10 to 26 feet, it is URW's plan to provide additional trees on the Property intermittently spaced in a more organic manner, as indicated on Attachment A. Notably, of the 11 right-of-way sections provided in the draft Design Guidelines, *only* the Westlake terrace section includes a double row of standard street trees (See Attachment B)<sup>1</sup>

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<sup>1</sup> The Rockledge Boulevard section provides for a row of standard street trees and a second row of ornamentals.

- 6 foot to 10 foot wide public sidewalk – While the Design Guidelines section provides for a consistent sidewalk width of 10 feet, the proposed section provides for a varying width of 6 to 10 feet (the varying widths are a result of the inconsistent dedications along the north side of Westlake Terrace and the existing varying widths of the Cartway). The 6 to 10 foot wide sidewalk is more than sufficient given that the Applicant is providing a supplemental sidewalk and amenity zone of 10 to 26 feet in width, thus providing an extremely generous streetscape area to be enhanced for the benefit of the pedestrians. URW understands that it is important that this entire area from face of building to the bike path be well designed and inviting. To this end, and at significant cost, URW plans to underground the transformers along Westlake Terrace in response to Staff's request. URW is looking forward to working with Staff on the streetscape details in connection with the approval of the Project.

In considering URW's proposed modified section we note that the Design Guidelines include 11 right-of-way sections and every major roadway within the Rock Spring Sector Plan area has a different proposed section, with the exception of Rock Spring Drive and Fernwood Road. Moreover, there is great variation among many of these sections. Thus, while URW's relatively minor proposed modifications are different than what was originally proposed for Westlake Terrace, all of the major roadways have a distinct design and should be compatible with the zones they serve.

#### B. Democracy Boulevard

The proposed Design Guideline's section for Democracy Boulevard would require the entire reconstruction of Democracy Boulevard along the frontage of the Mall Property, including the relocation of the existing median. As URW discussed with Staff, this reconstruction would cost millions of dollars with very little overall benefit. As the proposed revised Democracy Boulevard section (See Attachment C) indicates, it is possible to provide a desired 10 foot wide bike lane, sidewalk and street trees in the existing back of curb area, without necessitating massive road improvements. Recognizing the importance of fiscal responsibility, Staff requested that URW provide the alternative section for consideration.

#### C. Specific Westfield Montgomery Mall Comments (pages 72 and 73 of Design Guidelines)

1. Figures 3.30 and 3.34 (pages 69 and 73) – The images show a build-to line along Westlake Drive. URW recommends that this build-to line be eliminated. The grades of the Property are too high to orient any building toward Westlake Drive. Moreover, the majority of this frontage area is owned in fee by Macy's, with a separate entity unrelated to URW owning the gas station at the corner, and thus

URW does not have control over this area. To the extent Macy's were to expand, its development would be an extension of the existing Mall structure, not the development of a new freestanding building. Finally, the Regional Shopping Center overlay zone requires a three to one setback for any building over 45 feet in height. Thus, the height of a given building may control its ultimate location given the required setbacks. Any future development in this portion of the Property will need to be closely evaluated in the context of all of these factors.

2. URW has worked closely with Staff to provide access to the Property off of Westlake Terrace while respecting the streetscape and aligning with the streets north of Westlake Terrace. The solution does not involve extending either Autopark Avenue or Motor City Drive through the Property and thus we recommend that the second bullet on page 72 be deleted. In addition, the Project does not provide any public streets (the ground plain is above the parking structure) and therefore the Design Guidelines should clarify the status of the internal access ways.
3. The images on Figures 3.33 and 3.34 should be replaced with the URW images and the location of heritage gardens (the civic green) should be accurately located on Figure 3.9.

### III. Conclusion

We appreciate your consideration of the recommended revisions to the Rock Spring Urban Design Guidelines. The proposed Project is large in scope, complex and a very significant investment on behalf of URW. The recommended revisions are intended to further the County's identified design objectives while at the same time ensuring the long term viability of the Montgomery Mall Property.

Very truly yours,



Patricia Harris  
Attachments

cc: Mr. Norman Dreyfuss  
Ms. Natali Fani-Gonzalez  
Mr. Gerald R. Cichy  
Ms. Tina Patterson  
Ms. Carrie Sanders  
Mr. Atul Sharma  
Mr. Jim Agliata



UNISAL-RUDANCO WESTFIELD

**Dewberry**

DEWBERRY ENGINEERS, INC.  
2500 GAITHERS ROAD, SUITE 204  
FARMERS BRANCH, MD 20741  
PH: 301.483.2500 FAX: 301.250.7607  
WWW.DEWBERRY.COM

**CONTACT**

KEVIN O'NEAL  
MANAGER, CIVIL & SITE LIAISON  
KONIGSBERG, MD 20686  
WWW.DEWBERRY.COM

**APPLICANT DEVELOPER**

WESTFIELD MONTGOMERY MALL  
3700 JEFFERSON AVENUE, SUITE 300  
BETHESDA, MD 20814  
CONTACT: JIM KAGAWA

WESTFIELD MONTGOMERY MALL  
PRELIMINARY PLAN  
PARCEL P LAKEVIEW  
MONTGOMERY COUNTY, MARYLAND  
ELECTION DISTRICT 10  
WSSS SHEET MAP 2 (JANUARY 2007) TXX MAP GRD3 GRD3 GRD3

NOT TO SCALE

SCALE: 1" = 30'

DATE: 11/12/2009

CHECKED BY: JRM

APPROVED BY: JRM

DESIGNED BY: JRM

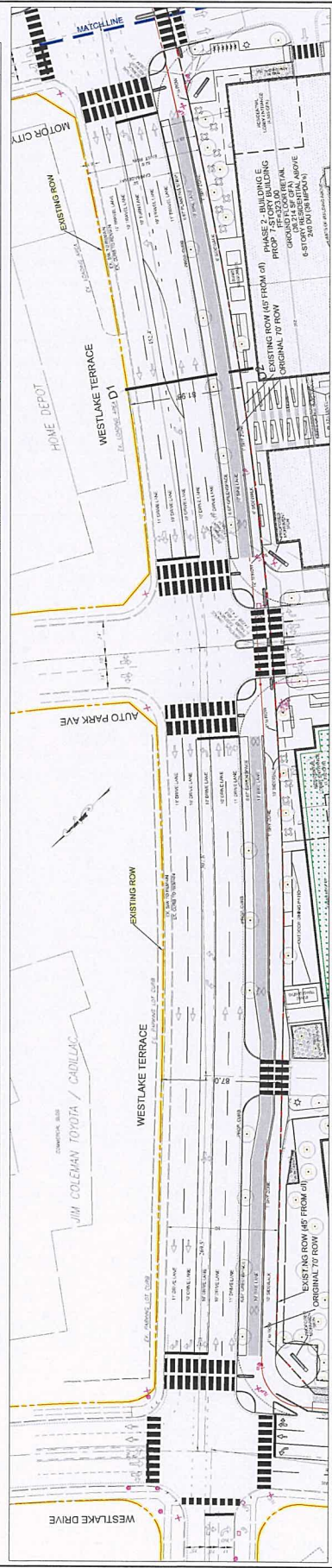
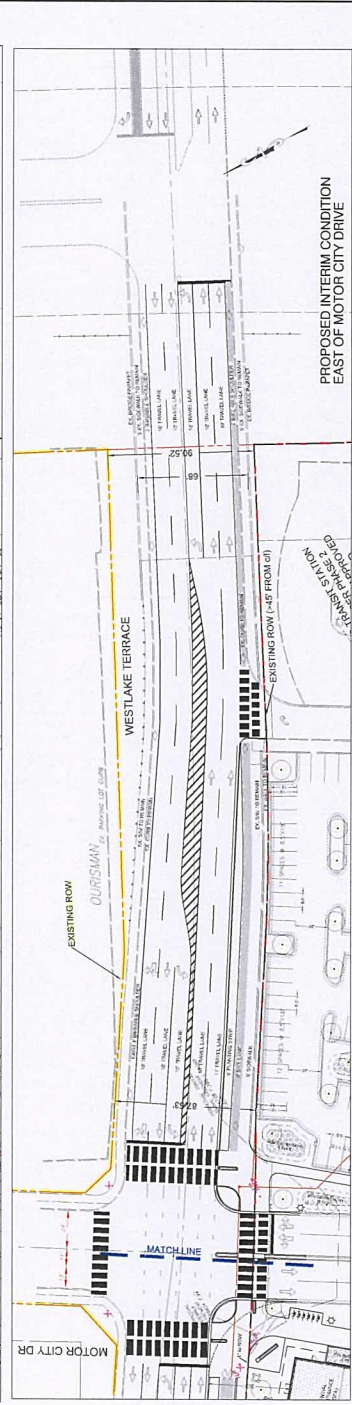
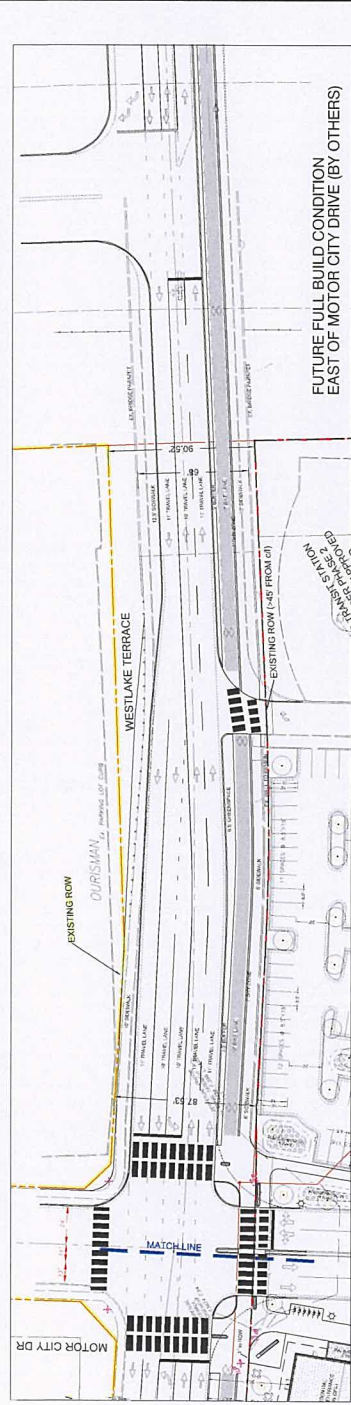
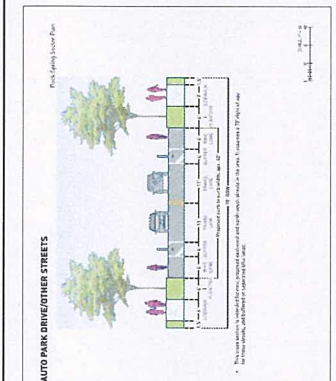
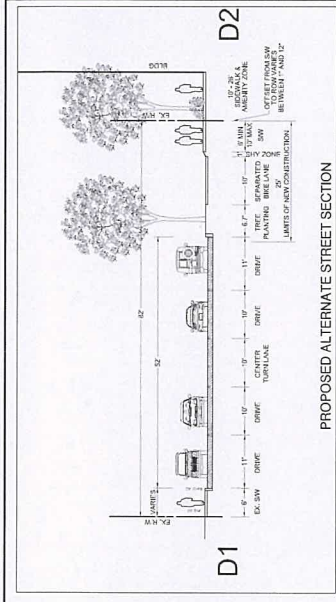
DRAWN BY: JRM

**ALTERNATE WESTLAKE TERRACE IMPROVEMENTS**

PROJECT NO.: 2009012

SHEET NO.: 26-CIRC-00000000-311

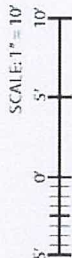
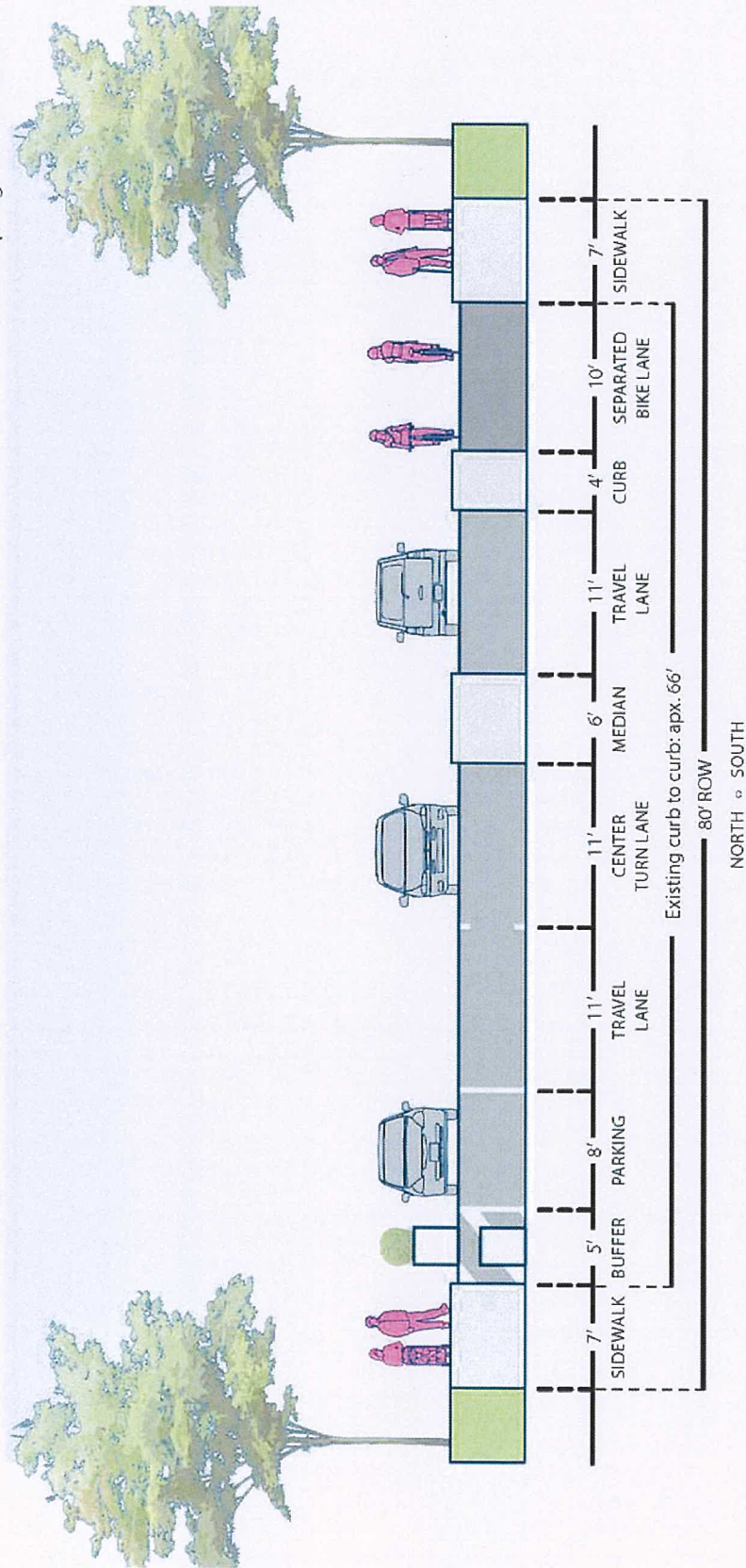
**C3.11**





ROCK SPRING DRIVE/FERNWOOD ROAD

①  
Rock Spring Sector Plan



- This section shows an interim / near-term condition, which could be implemented without changing curblines. Longer-term, along the central spine of Westlake Terrace, Fernwood Road, and Rock Spring Drive, the transitway is planned to operate in parallel dedicated BRT lanes within a 40-foot transit easement on the north side. The exact cross section in still under evaluation - consult with MCDOT staff for more information.
- This section includes the recommendation from the Sector Plan for a "road diet" that would reconfigure the street from four to three travel lanes. The curb separating the travel lane and cycle track should be a mountable curb.
- This section is slightly different from the interim section shown on page 70 of the Rock Spring Sector Plan and supersedes that section. The modifications were made in consultation with MCDOT and Planning Staff and achieve a better accommodation of various travel modes.
- A two-way cycle track is envisioned on the south side of the street.
- Longer-term, when the road is reconstructed, the planted buffer and the sidewalk should be switched so that the plantings provide a buffer between the pedestrians and the vehicle lanes.
- Setback may contain buildings, hardscape, or landscape, depending on the context.
- The content/design of the buffer will be determined during the regulatory review process or in association with a capital improvement project.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.

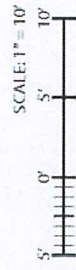
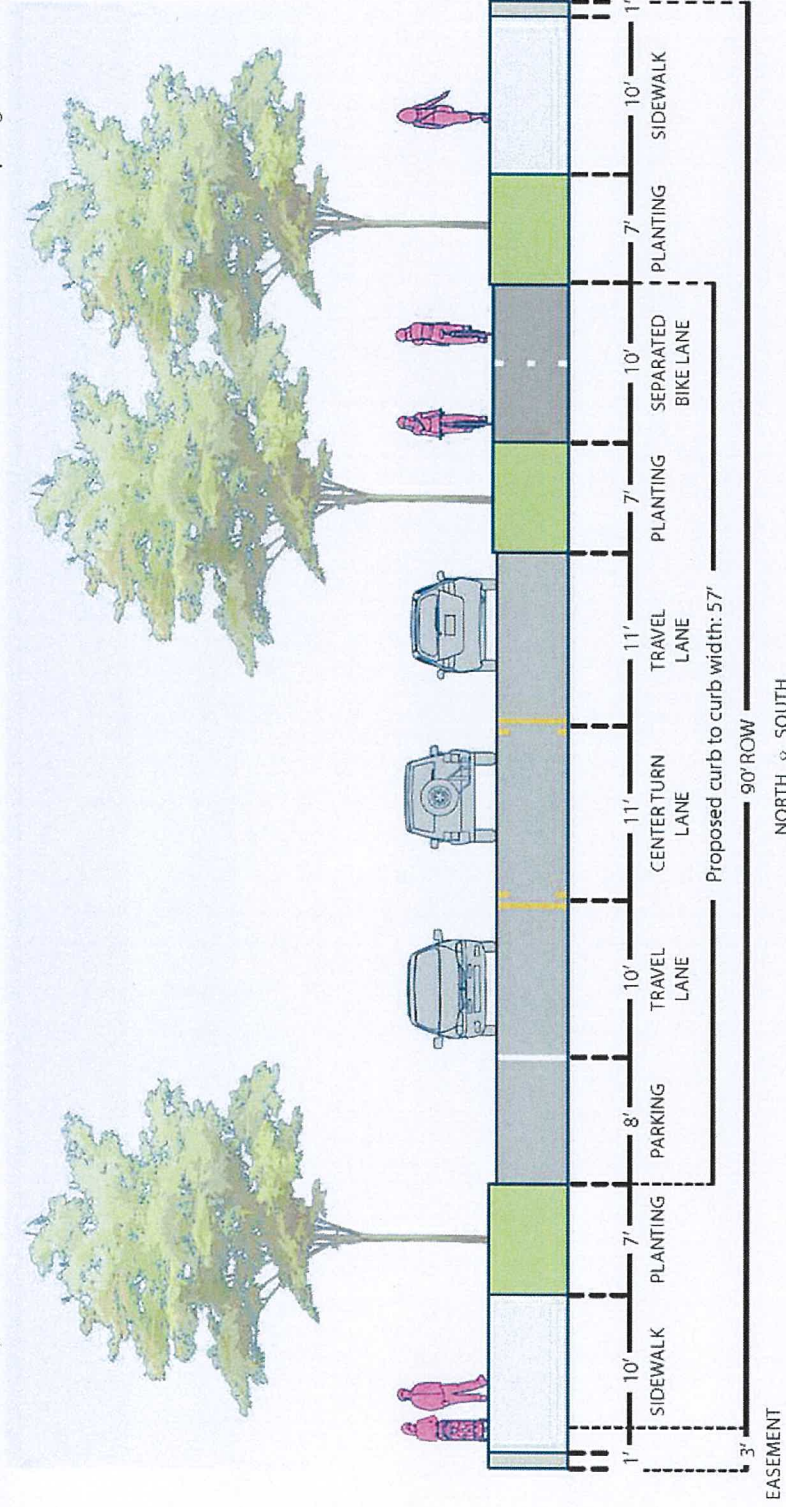


# WESTLAKE TERRACE

West of Motor City Drive

## 2

Rock Spring Sector Plan

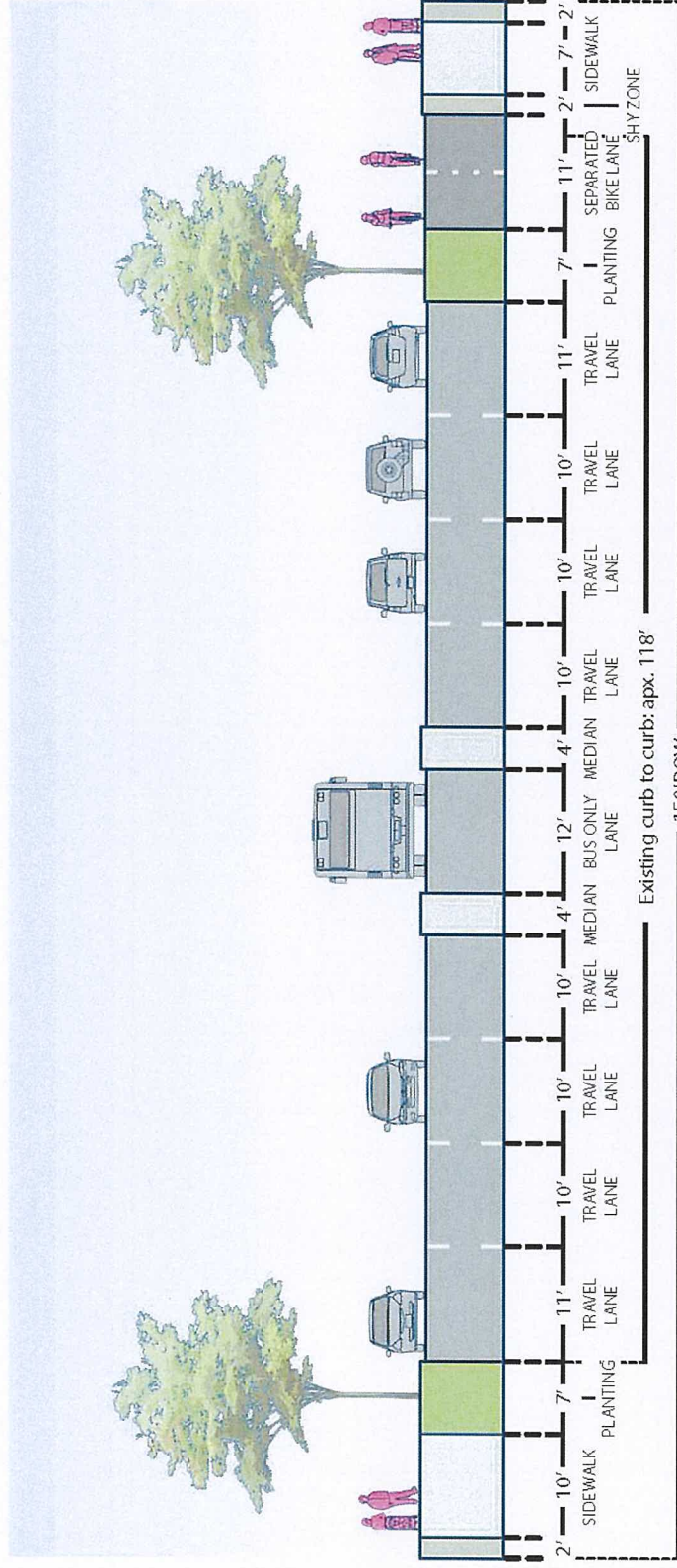


- The sector plan calls for concentrated development intensity along Westlake Drive and Westlake Terrace and proximate to the transit center on the west side. To the extent possible, the goal is to activate the frontage of Westlake Terrace.
- This section includes the recommendation from the Sector Plan for a "road diet" that would reconfigure the street from four to three travel lanes. Detailed evaluation is needed to confirm the feasibility of this concept.
- The Bicycle Master Plan recommends a two-way separated bike lane on the south side of the street.
- The future cross section will need modifications at the bridge over I-270, where the right of way decreases to 80'.
- An additional 3' is required on the north side of Westlake Terrace, west of Motor City Drive. This should be acquired through easements when properties on the north side redevelop.



# OLD GEORGETOWN ROAD Rock Spring Drive to I-270

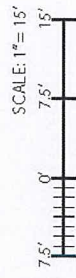
## ③ Rock Spring Sector Plan



- The Bicycle Master Plan includes a breezeway on the east side of the street; specifically, a two-way separated bike lane.
- This area is under consideration for a future bus rapid transit service, which is envisioned to include a dedicated bus lane between Cheshire Drive and the I-270 SB lane. The exact cross section is under evaluation/planning - consult with MCDOT staff prior to roadway reconstruction / improvements.
- Additional right-of-way may be needed at intersections to accommodate turn lanes and pedestrian refuge islands.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.



#### ④ Rock Spring Sector Plan



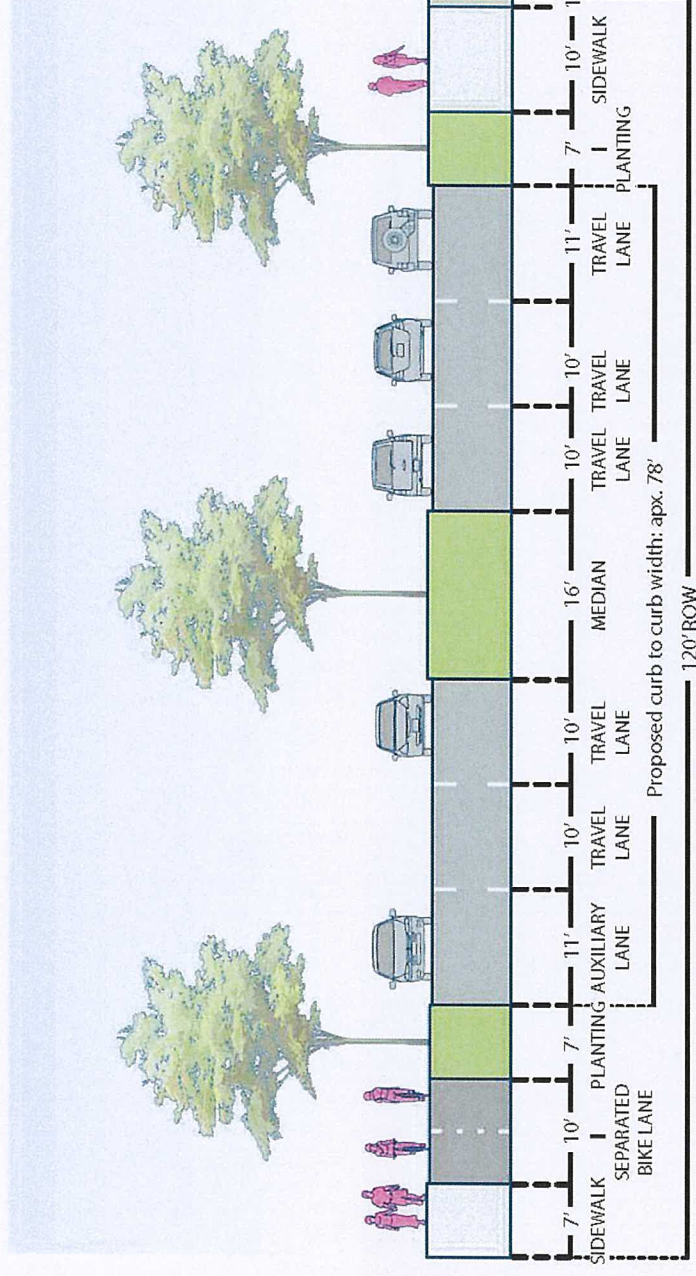
- 78 URBAN DESIGN GUIDELINES FOR ROCK SPRING AND WHITE FLINT 2 SECTOR PLANS • DRAFT • MARCH 2019



# DEMOCRACY BOULEVARD

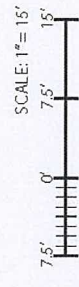
Bells Mill Road to Old Georgetown Road

## 5 Rock Spring Sector Plan



NORTH  $\circ$  SOUTH

- The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.

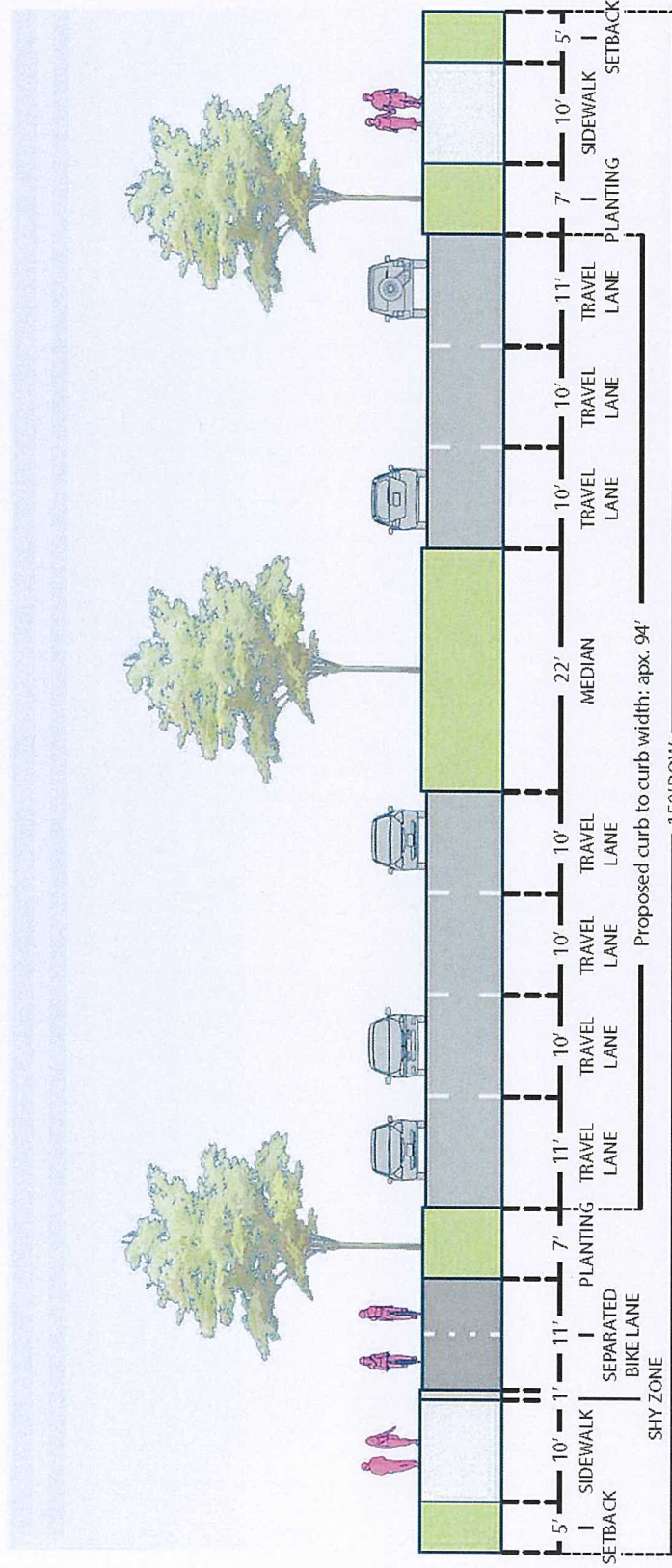




# DEMOCRACY BOULEVARD

Westlake Drive to Bells Mill Road

## ⑥ Rock Spring Sector Plan



- The existing curb-to-curb width varies from approximately 100' near I-270 to approximately 90' at Old Georgetown Road.
- The Bicycle Master Plan recommends a breezeway on the north side of the street. Specifically, a shared use path.
- The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.
- The setback may contain buildings, hardscape, or landscape depending on the context.

SCALE: 1" = 15'

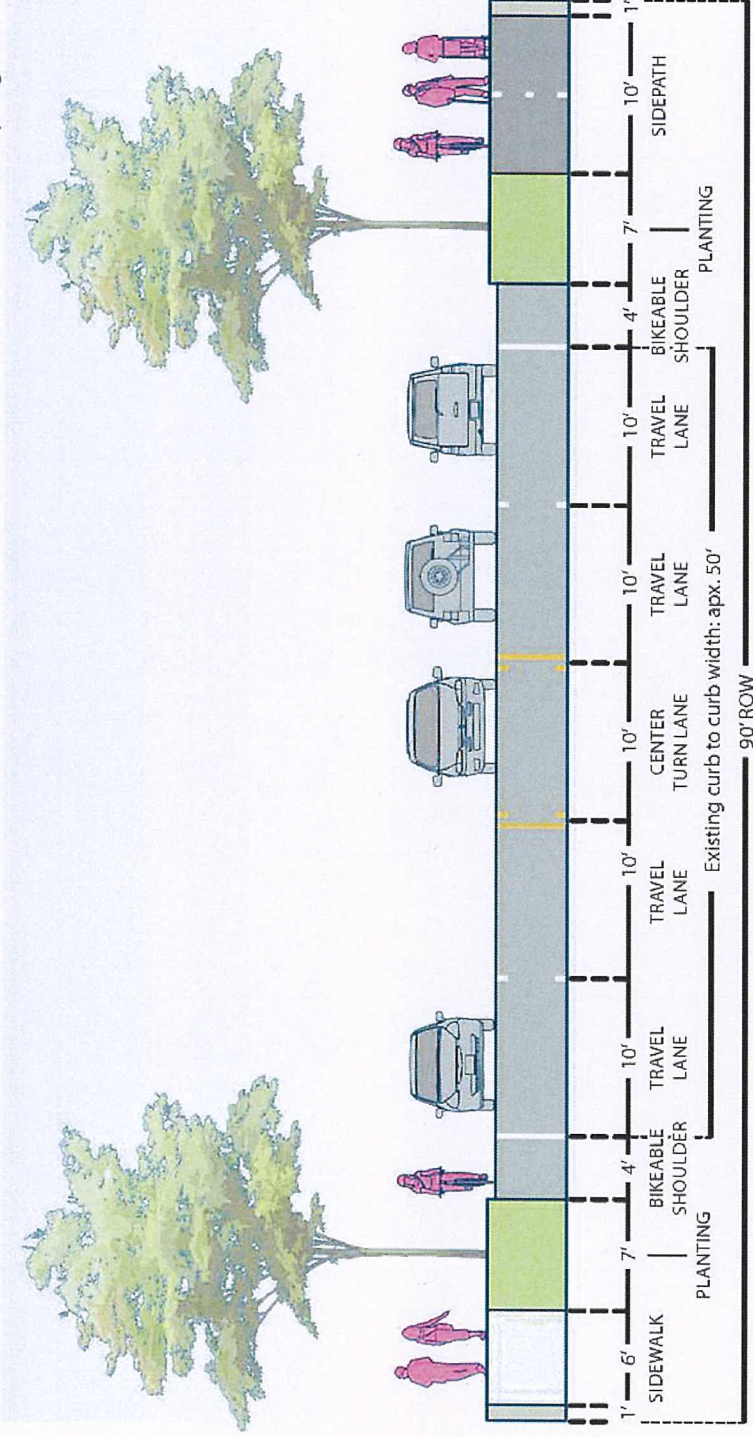
7.5' 0' 7.5' 15'

# WESTLAKE DRIVE

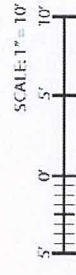
Democracy Boulevard to Westlake Terrace

⑦

Rock Spring Sector Plan



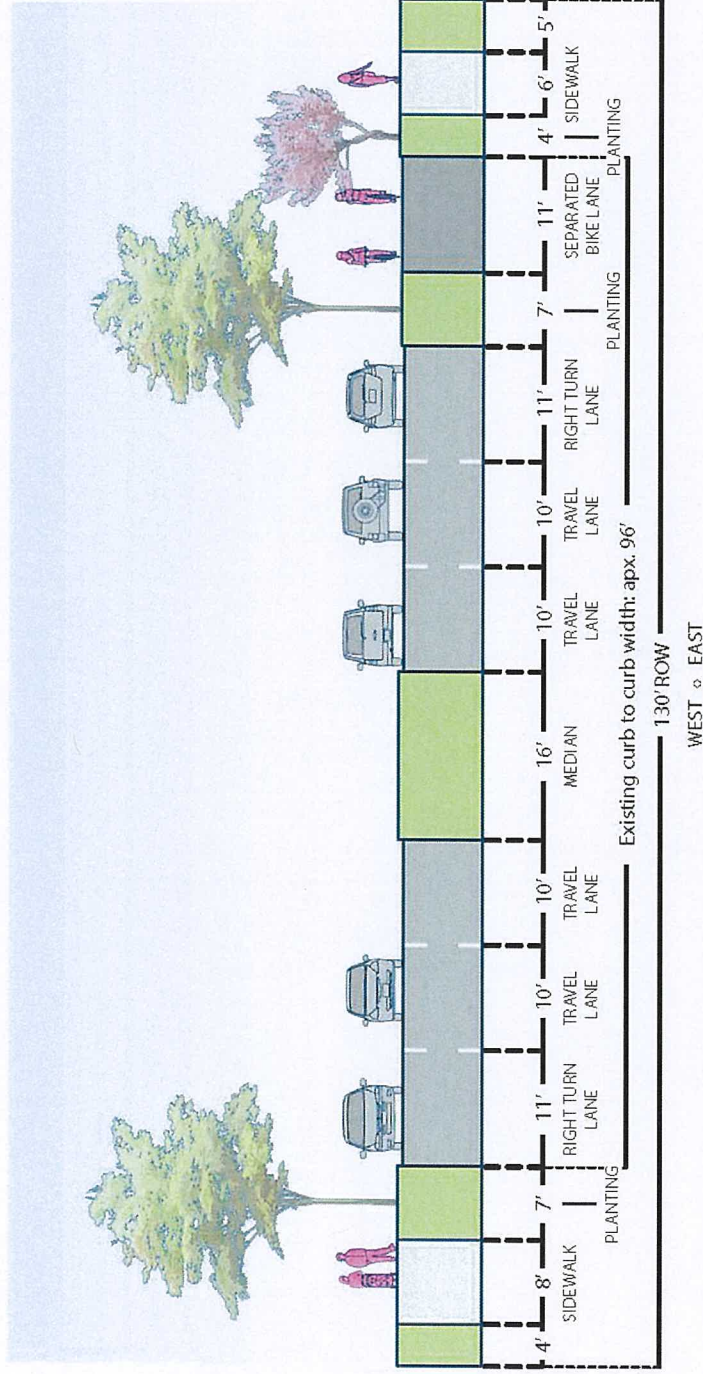
- The Bicycle Master Plan calls for a sidepath on the east side and bikeable shoulders.
- The Sector Plan recommends reclassification from a two-lane primary residential to a two-lane minor arterial.
- As an interim condition, this section could be implemented within the existing curb-to-curb width if the bikeable shoulders were eliminated.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.



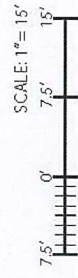


# ROCKLEDGE BOULEVARD Rock Forest Drive to I-270

## 8 Rock Spring Sector Plan



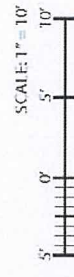
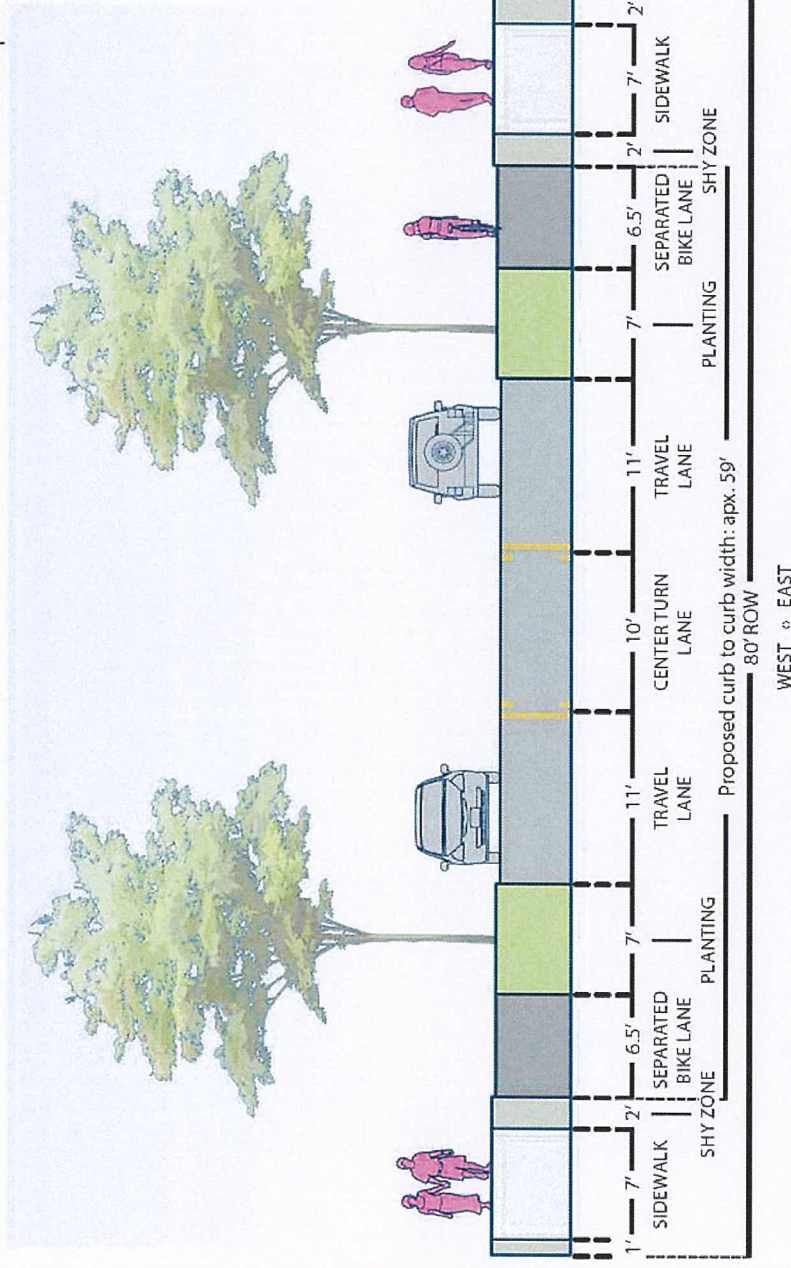
- This section includes the removal of a turn lane. Further evaluation is needed.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.





# ROCKLEDGE DRIVE

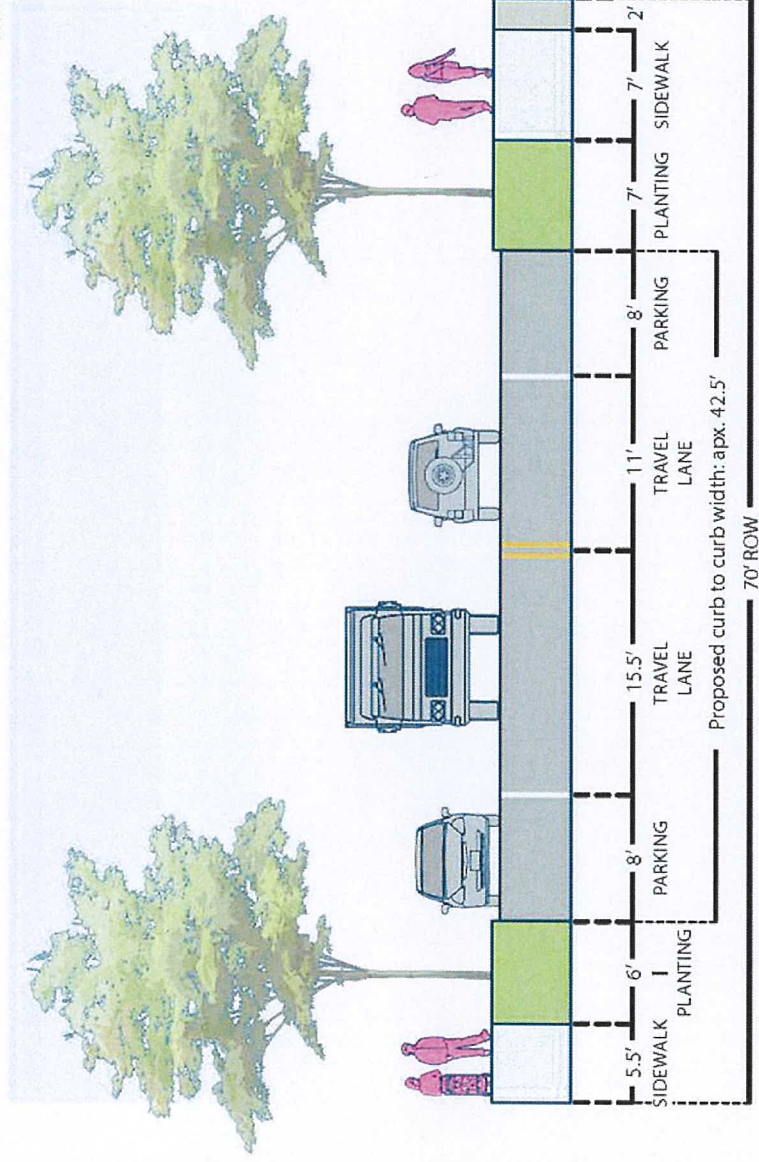
## 9 Rock Spring Sector Plan



- The existing curb-to-curb width is approximately 68'. This proposed section would require moving curbs.
- This section includes the recommendation from the Sector Plan for a "road diet" that would reconfigure the street from four to three travel lanes. Further evaluation is needed to confirm the feasibility of this concept.
- The Bicycle Master Plan and Sector Plan call for a one-way separated bike lane on each side of the street.
- The existing curb-to-curb width shown is an estimate for planning purposes. Field verification is needed. The right-of-way (ROW) shown corresponds to the design standard identified for this street in the Sector Plan.

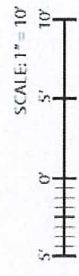
# MOTOR CITY DRIVE

## 10 Rock Spring Sector Plan



WEST ◊ EAST

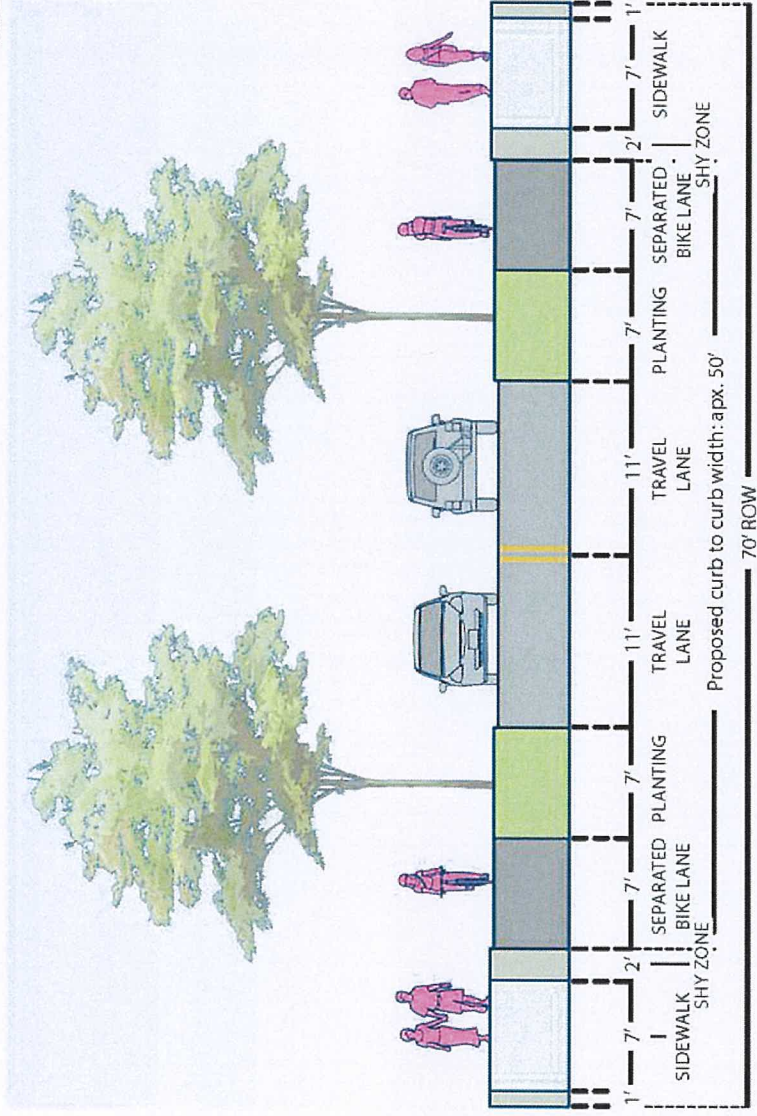
- The southbound travel lane width is provided to accommodate commercial truck serving businesses here.



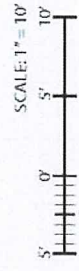


# AUTO PARK DRIVE/OTHER STREETS

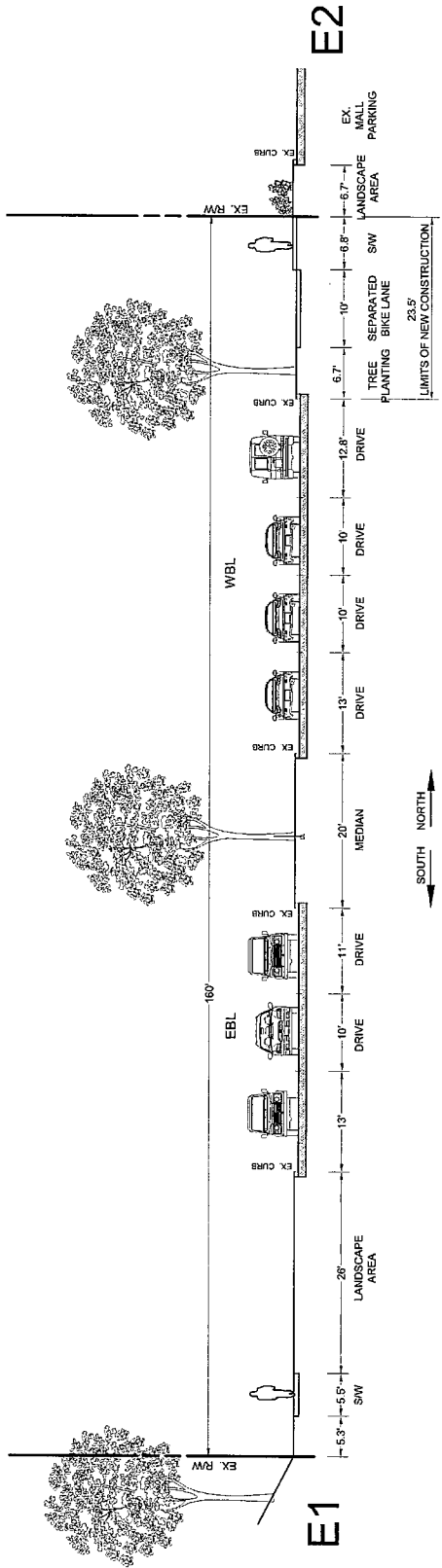
Rock Spring Sector Plan



- This cross section is intended for new, proposed east-west and north-south streets in the area. It assumes a 70' right of way for these streets, and buffered or separated bike lanes.







**DEMOCRACY  
BOULEVARD**

**Patricia A. Harris**  
*Attorney*  
Phone 301-841-3832  
[paharris@lercheearly.com](mailto:paharris@lercheearly.com)

June 3, 2019

**VIA ELECTRONIC MAIL**

Casey Anderson, Chair  
Montgomery County Planning Board  
Maryland-National Capital Park and Planning Commission  
8787 Georgia Avenue  
Silver Spring, Maryland 20910

Re: Rock Spring Urban Design Guidelines

Dear Chairman Anderson:

On behalf of Erickson Living, the purchaser of the current Marriott Headquarters site at 10400 Fernwood Road (the "Property"), we want to provide a few comments to supplement the comments we provided in our memo dated May 13, 2019 that is included as an attachment to the Staff Report for this coming Thursday's discussion on the Rock Spring Urban Design Guidelines.

Erickson Living is excited to bring a continuing care residential community ("CCRC") to Rock Spring after Marriott relocates to its new downtown Bethesda headquarters' site. To this end, Erickson has been working closely with Staff over the past year in connection with the overall CCRC concept for the Property, as well as more recently with respect to the recommendations of the Design Guidelines.

As Erickson has emphasized to Staff, while the Zoning Ordinance classifies a CCRC as a residential use, the primary purpose of an Erickson community -- where the average age of the resident is 82 -- is to provide health related services to its aging residents. As a result, the health related programmatic considerations and the safety of the residents are the two most important factors that influence the ultimate design of an Erickson community. We are pleased that as a result of our continued discussions with Staff there is recognition of this and at our last meeting with Staff on May 28 there was acknowledgment of several important components of the CCRC project that relate in part to the Design Guidelines. These include the following:

1. In order to activate the Fernwood Road frontage of the Property, Staff has indicated that if possible, they would like to see a small amount of ground floor retail, in the amount of 5,000 square feet to no more than 15,000 square feet. Because any retail that is provided in this location would be exclusively neighborhood serving, Staff supported not requiring any additional parking to accommodate the retail.

2. The parameters of the civic green to be included in the Design Guidelines include a size of between one and one and one-half acres; frontage along Fernwood Drive; easily accessible; and proximate to the BRT station that has yet to be identified. The ultimate location of the civic green will be decided in connection with the development of the Property and the Design Guidelines should include language that the current location of the civic green as shown on various figures within the Design Guidelines, is illustrative.
3. The Design Guidelines should promote pedestrian crossings only at intersections; mid-block street crossings should not be encouraged.
4. The CCRC's architecture, especially those portions of the buildings situated at the corners of Fernwood Road and the roads leading into the Erickson community, is important.
5. Access to the stream buffer, via a pedestrian path off of the civic green as well as a separate route along one of the internal streets, is appropriate. Separate from the Design Guidelines, the Applicant should also consider whether additional access to the stream buffer internal to the Property, for the use of the residents, is needed.

The Design Guidelines are exactly that -- guidelines. They should establish general objectives and parameters for the development of a site, but should not predetermine the ultimate design, layout or location of amenities (such as a civic green) of a project. Instead, these components are to be determined during the very thorough entitlement process, taking into account all factors that will influence the ultimate design of a project.

We look forward to working with Staff on this exciting project and pursuing the necessary entitlements.

We appreciate your consideration of our comments.

Very truly yours,



Patricia A. Harris

cc: Mr. Norman Dreyfuss  
Ms. Natali Fani-Gonzalez  
Mr. Gerald R. Cichy  
Ms. Tina Patterson  
Ms. Carrie Sanders  
Mr. Atul Sharma  
Mr. Steve Montgomery