

Item 9 - Correspondence

From: [Margolies, Atara](#)
To: [MCP-Chair](#)
Subject: FW: MCDOT Comments on Draft Silver Spring Plan - detailed comments now included
Date: Wednesday, December 15, 2021 1:09:40 PM
Attachments: [Silver Spring Plan - MCDOT Detailed Comments.xlsx](#)
[Silver Spring Plan - Public Hearing Draft Comments.pdf](#)

Atara Margolies, AIA, LEED AP
Planner Coordinator

Montgomery County Planning Department
2425 Reedy Drive, Wheaton, MD 20902
Atara.Margolies@montgomeryplanning.org
p: 301.495.4558

From: Bossi, Andrew <Andrew.Bossi@montgomerycountymd.gov>
Sent: Wednesday, December 15, 2021 1:01 PM
To: Margolies, Atara <Atara.Margolies@montgomeryplanning.org>
Subject: FW: MCDOT Comments on Draft Silver Spring Plan - detailed comments now included

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

FYI

Andrew Bossi, P.E. | he/him
MCDOT Senior Engineer, Transportation Policy
240.777.7200.direct // 240.777.7170.general

From: Henn, Hannah <Hannah.Henn@montgomerycountymd.gov>
Sent: 14 December 2021 17:00
To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>
Cc: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>; Bossi, Andrew <Andrew.Bossi@montgomerycountymd.gov>; Wellington, Meredith <Meredith.Wellington@montgomerycountymd.gov>; Erenrich, Gary <Gary.Erenrich@montgomerycountymd.gov>
Subject: MCDOT Comments on Draft Silver Spring Plan - detailed comments now included

Casey,

As a follow up to the memo transmitted last week containing high level MCDOT comments, please see attached for that same memo (same file—just provided again for convenience of access) and a newly included Excel document of all detailed comments (many of which are referenced in the consolidated memo). Andrew Bossi is available to discuss any of these detailed comments and will reach out separately to Planning staff to offer his assistance. Thank you in advance for consideration by Planning staff and the Planning Board.

Hannah Henn

Deputy Director for Policy

Montgomery County Department of Transportation

From: Henn, Hannah

Sent: Friday, December 10, 2021 3:40 PM

To: Casey.Anderson@mncppc-mc.org

Cc: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>; Bossi, Andrew <Andrew.Bossi@montgomerycountymd.gov>; Wellington, Meredith <Meredith.Wellington@montgomerycountymd.gov>; Gary Erenrich (Gary.Erenrich@montgomerycountymd.gov) <Gary.Erenrich@montgomerycountymd.gov>

Subject: MCDOT Comments on Draft Silver Spring Plan

Hello Casey,

Please see attached for MCDOT's comments on the draft Silver Spring Downtown and Adjacent Communities Plan. The attached document highlights areas for improvement that we feel are most important. Please note that we are sending these comments to you now to facilitate as much time as possible for consideration before the work session next week. We plan to send you a separate file of our detailed comments this coming Monday.

Hannah Henn

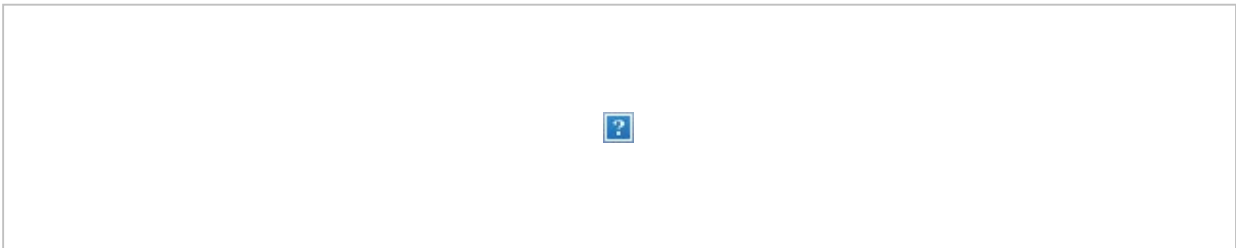
Deputy Director for Policy

Montgomery County Department of Transportation


Office of the Director


101 Monroe Street | 10th Floor | Rockville, MD 20850

(240) 777-8389




For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19

0		Team	Commenter	Page	Section	Comment
3	*	Policy	ADB	General	General	Consider allowing higher heights and more intensive FARs for all public properties. The maximum the plan is comfortable providing will better enable redevelopment of these sites, achieving the envisioned goals for these sites, and on a more rapid implementation timeline.
6		Policy	ADB	General	General	Consider including a Glossary of Terms. Previous master plans have done some good work drafting these; consider copying from examples such as the Veirs Mill Plan and updating as needed with any new terms.
7	**	Policy	ADB	General	General	<p>It would be preferable to align boundaries as nearly as feasible:</p> <ul style="list-style-type: none"> - The Plan Area (p10) - BPPA - Urban area - CBD (if applicable) - Enterprise Zone (if applicable) - Arts & Entertainment zone - PLD (p109) - TMD (p110) - any others <p>Think about anywhere where they differ: in general I'd err toward expanding smaller areas to match bigger areas, but this could be a continued discussion.</p>
11		Policy	ADB	10	Map 1	Consider a different color for the rail lines to help them stand out a bit more, as these are a fundamentally core component of the plan area both from an infrastructure perspective as well as a social perspective.
15		Policy	ADB	14	2.6	RE: Connectivity, 2nd Bullet - I'm sure it'll make sense when I get to that section, but at this stage in the document it is not clear to the reader for whom "priority streets" are prioritized for. For vehicular movement? For peds &/or bikes? For transit? For freight? This might need some more adjectives describing what's intended here.
16		Policy	ADB	20	Map 4	Show the Metropolitan Branch Trail / Capital Crescent Trail on this map as well as the cut-out maps included in each District's write-up.
17		Policy	ADB	20	Map 4	<p>[same comment made on p93]</p> <p>We've confirmed that the full ROW of Eastern Avenue is maintained by DDOT (there was a time when we used to maintain behind the curb, but those responsibilities have shifted).</p> <p>With that in mind: we should make it clear that Eastern Ave is under DC jurisdiction. We could establish that we have an *interest* in a bikeway as a position of advocacy toward the District.</p>
18	*	Policy	ADB	21	3.2.2	Need to ensure whatever is envisioned can fit w/in ROW and also that there is a maintenance plan between SHA, MCDOT, MCDEP, Urban District, and any other entities

0		Team	Commenter	Page	Section	Comment
19	**	Policy	ADB	21 114	3.2.2 4.7.4	Need more info on "cool surfaces" - are these other pavements? Concrete instead of asphalt? Or more shade? Need to ensure adequate ROW for any additional trees. And if considering concrete instead of asphalt: need to be mindful that it's hard to keep pavement markings visible on these, and also the production of concrete (particularly cement) has a massive environmental impact.
20	**	Policy	ADB	21 119	3.2.2 4.7.7	Use of EV charging stations should be considered areawide or as part of PLD facilities (which we're already doing) and perhaps not limited only to the Green Trail. Also note that while shifting the *share* of fossil fuel vehicles to EV is good... we concurrently want to reduce the total number of vehicles regardless of how they're powered. (Zero Emission & Electric Vehicles themselves still pose environmental harms as well as physical harms in the context of Vision Zero)
21	**	Policy	ADB	21 119	3.2.2 4.7.7	In the context of the County's larger goal of going fully to clean energy within the lifetime of this plan: it would not seem to be necessary to master plan for solar powered lights, bus shelters, etc. This may actually be *more* environmentally damaging, as a large amount of small solar components will have a greater environmental impact than relying on centralized clean power plants elsewhere. Also, small solar-powered infrastructure may not be practicable in an area anticipated for high-rises and more shade trees.
22		Policy	ADB	22	Map 5	I think the bridge at the MARC platforms can be accessed via the public parking garage along E-W Hwy? I mean it's not an apparent path to someone unfamiliar with the area, so it could be better... but it *is* an existing crossing, I think it's ADA accessible and it should probably be shown on this map with a purple arrow. The text in the 2nd paragraph should read *five* points instead of four, and might include a sentence that one of those is relatively hidden and not easily used.
23	**	Policy	ADB	22-23 146	3.2.3, Map 5	We reiterate our strong suggestion that the language regarding the proposed new connection be kept open as to whether it goes over or under. This would entail using a third color on Map 5. In the accompanying text, I think what you've suggested *if* it's a bridge would be fine, and would suggest you expand this with suggestions of what features a tunnel option should include. The reasoning is that a tunnel may be substantially more convenient to users (the southwest side is about 8' lower than the RR tracks) and may also be lower-cost.


0		Team	Commenter	Page	Section	Comment
24	**	Policy	ADB	23	3.2.3	<p>Provide some language enabling this connection to be conditioned on new development. This should address at least three things:</p> <ul style="list-style-type: none"> - Define ROW or easement requirements in event of a publicly-built connection, such as ensuring unfettered public access and limiting physical, visual, and noise encroachment. - Allow the connection to be made within private development, but under defined requirements such as: hours of access, ease of navigation & convenience, ADA accessibility, visibility and "obviousness" of the route, wayfinding, and other items. - Define "stubs" that might be built by a developer at the point where a future bridge/tunnel might be provided, where the future structure would be built as either a public capital project or by whichever development eventually proceeds on the opposite side.
25	*	DTE	MJ	23	3.2.3	Consider also including language that recommends a future extension of the Silver Spring Metro south mezzanine to cross over the Washington-bound CSX track as to provide direct connectivity with the MARC platform.
26		CSS	JJC	24	3.2.3	In addition to improved lighting for underpasses like Georgia & Colesville, has there been any discussion of adding emergency phones?
27		Policy	ADB	24	3.2.3	RE: 3rd Bullet - Typo: it's Colesville Road; not Colesville Avenue
28		Policy	ADB	24	3.2.3	RE: Last Bullet - Consider deleting "Study ways to" and just leaving it as "Widen". This edit would make this a more functional action item.
29	**	Parking, Policy	BHM, ADB	25	3.3.1	<p>RE: Urban Design, 2nd Bullet - This portion of Ellsworth is already usually closed on most days. This phrasing makes it sound like it would only be fully closed for more limited purposes, and that it would be opened to loading & emergency vehicles as a matter of standard practice.</p> <p>(granted, I think emergency vehicles can and do use it even when it's closed today; so really this phrasing reads more as an expansion of truck access)</p> <p>This distinction could affect design as well as public expectations. Please provide more clarity as to what, exactly, is envisioned here.</p> <p>If our interpretation of the phrasing is accurate: the phrasing may be OK; we might just need an offline confirmation that yes, a more truck-accessible Ellsworth is indeed the vision.</p>
30		Policy	ADB	25	3.3.1	RE: Urban Design, 2nd Bullet - Should there be a space in "flexiblestreet" or is this intended to define a new word?

0		Team	Commenter	Page	Section	Comment
31	*	Policy	ADB	25	3.3.1	<p>RE: Parks & Public Spaces, 1st Bullet - I'm glad to see this; the Silver Spring Shopping Center's parking lot is an immense impediment in connecting the Fenton/Ellsworth Core with the Georgia/Colesville Metro Station area.</p> <p>It would be immensely helpful for this plan to focus on this in greater detail, specifically highlighting what the historic elements are & laying out a vision for the lot, particularly how to improve pedestrian safety, connectivity, and experience.</p> <p>Consider a two-option vision, (1) one where it remains a private lot & is focused more on specific interests should the site redevelop, and (2) another option which envisions a public capital project overhauling the lot.</p>
32	*	Policy	ADB	26 29	3.3.1	<p>The Bicycle Master Plan identifies a Bicycle Station with 40 long-term spaces and 170 short-term spaces at either Public Garage 60 (the Wayne Ave Garage) or as part of the Silver Spring Library. Consider highlighting this in the Opportunity Sites sections on either p26 (Garage 60) or p29 (Library). (note that the information on p92 provides different numbers for short-term spaces from the Bike Master Plan)</p>
33		Policy	ADB	26	Figure 6	<p>It's unclear what the yellow highlight is for; need to either delete or define in the legend</p>
35		Policy	ADB	28 32	3.3.1	<p>It's unclear why other Districts have their own sub-section numbers but Fenton Village and Metro Center do not. It seems like they should be 3.3.2 and 3.3.3, respectively, with subsequent sub-sections being subsequently renumbered.</p> <p>Also the subsections in the later sections appears to be all over the place; I think they're just a bunch of typos or something got mixed up in InDesign.</p>
37				28	3.3.1	<p>RE: Goals, 4th Bullet - Is the goal of designating Fenton a "main street" compatible with the planned bike lane, and resulting reduced street parking and transit lanes? How is this term envisioned to apply to the Street Zone?</p>
40		Policy	ADB	28	3.3.1	<p>RE: Urban Design, 1st Bullet of this page - By saying "throughout the District", this text implies more through-block connections than the 2 or 3 connections I'm counting in in the map (Figure 7) on p30.</p>
41		Policy	ADB	28	3.3.1	<p>RE: Parks & Public Spaces, 1st Bullet - Need to consider how expanding Fenton Street Urban Park will affect Philadelphia Avenue, particularly with regards to access, turnarounds, utilities, and other issues associated with potential abandonment.</p>


0	Q	Team	Commenter	Page	Section	Comment
42		Policy	ADB	28	3.3.1	<p>RE: Parks & Public Spaces, 2nd Bullet // Opportunity Sites, 1st Bullet - Be mindful that this proposed park, as shown in Figure 7 (p30), appears to span both a private site and a public site. Consider either...</p> <p>- Showing the park entirely on the public site, which could reduce the developable area & subsequently increase net capital costs for such a project.</p> <p>- Or consider leaving as-is, spanning both public and private properties, which may delay implementation until such time as the private site can be purchased (which would also be an additional capital cost).</p>
43		Policy	ADB	30	Figure 7	It's unclear what the yellow highlight is for; need to either delete or define in the legend
44		Policy	ADB	30	Figure 7	It's unclear what the light-green arrow is for; need to either delete or define in the legend
45	*	Policy	ADB	32	3.3.1	RE: Opportunity Sites, 1st Bullet - The Bicycle Master Plan identifies this site as a location for a Bicycle Station with 600 long-term spaces and 170 short-term spaces. This should be reflected in this bullet.
46		Policy	ADB	32	3.3.1	RE: Opportunity Sites, 1st Bullet, Last Sentence - Consider changing "part of the Bonifant/Dixon garage site" to "part of all of the Bonifant/Dixon garage site".
47	*	Policy	ADB	33 37	3.3.1	<p>RE: p33, Opportunity Sites, 1st Bullet RE: p37, Opportunity Sites, 1st Bullet -</p> <p>It would be our preference that air rights above Bonifant St be retained for Garage 5/55, enabling maximum flexibility the development potential for the site & potentially enable such a project to proceed on a more rapid timeline. We would welcome further discussion as to how such a design might look or function, or what public benefits it would seek to achieve.</p> <p>Though if the plan remains determined to daylight that block of Bonifant & add ground-level open space as shown on p34 and p38: that would also be acceptable.</p>
48		Policy	ADB	33	3.3.1	RE: Opportunity Sites, 3rd Bullet of this page - Work with WMATA to identify the substation's needs and constraints. The current phrasing emphasizes relocating the substation, which may not be feasible. Or even if it is feasible, a better option might be to instead incorporate it into a redevelopment that either relocates it within the same site (such as by undergrounding it) or incorporating the existing structure into the redevelopment (as has been done in other regional developments such as a hotel under development on the 200 block of 12th St SW, DC).
49		Policy	ADB	35	Map 8	Consider assigning a zone above the WMATA substation on the north corner of Colesville/EW-Hwy. If this site ever redevelops by relocating or incorporating the substation: it would presumably make use of whatever zoning is applied here.
50		Policy	ADB	35	Map 8	Consider assigning a zone above the since-removed slip-road on the east corner of Colesville/Wayne. If this site ever redevelops it might be ideal to also incorporate that former slip-road space, albeit perhaps at least preserving ped/bike connectivity continuing the Ramsay alignment up to Colesville.

0		Team	Commenter	Page	Section	Comment
52		Policy	ADB	36	3.3.2	RE: Urban Design bullets - Consider adding a bullet that encourage developments to activate all frontages along public streets, including activating frontage onto the Metropolitan Branch Trail.
53		Policy	ADB	36	3.3.2	RE: Urban Design, 4th Bullet - Change the reference to "Mayor's Lane" to "Ripley Street", as the former is parallel to Georgia, and the latter appears to be what is intended.
54		Policy	ADB	36-37	3.3.2	See earlier comment on p23 regarding establishing how private development might be a part of any connection across the railroad tracks. Considering incorporating that comment into these bullets either under Urban Design or by calling out the specific property under Opportunity Sites.
55		Policy	ADB	38	Figure 9, Map 9	Consider making these a two-page spread with one graphic per page so that they're bigger, or perhaps placing Figure 9 and Map 9 side-by-side instead of top-and-bottom, which might allow Map 9 to at least be larger.
57		Policy	ADB	42 100	Figure 10 Map 23	<p>Consider a pedestrian link or shared street parallel to E-W Hwy that extends Kennett Street approximately straight up to Colesville Rd. Such a corridor could have an immense residential/retail potential, and could enable this potential on a corridor that the County controls (as opposed to DDOT's Eastern Ave or the State's E-W Hwy).</p> <p>A street is shown in the Streets Map on p100 but isn't shown in the map here on p42, plus that street shown on p100 appears to be a conventional street instead of something that could potentially be more ambitious.</p>
58		Policy	ADB	42	Figure 10	RE: New Connection in Blairs - The 90-degree curve as shown is not ideal & can present safety and operational difficulties. Consider showing this as a small curve (given the nature of the street it'd like be a 20 MPH curve).
59		Policy	ADB	42	Figure 10	RE: New Connection in Blairs - The inverse of the previous comment: the large sweeping curve shown on the other side of this line is also not ideal, as large curves like this can make sight lines difficult for pedestrians wishing to cross midblock, which is a behavior that on a street like this should not necessarily be expressly discouraged. Consider tightening this curve to about a 20 MPH curve.
60		Policy	ADB	44	3.3.6	RE: Vision - I think there's a typo... should be "world-renowned" instead of "world-renown" ?
64	**	Policy	ADB	48	3.3.4	<p>We strongly urge consideration of a connection linking Apple Ave with N/E Falkland Lane. In addition to better linking the two neighborhoods generally, this will specifically better connect to the South County Regional Recreation and Aquatic Center as well as the proposed grocery store in the Falklands North site. Note that this connection is included in the Transpo Recommendations on p94.</p> <p>As with the other new connection across the railroad tracks: we would urge that any such connection not explicitly restrict itself to a bridge or a tunnel, but rather that it keep both options available. Any references should also establish how it might be incorporated into private development (see comment on p23).</p>
66		Policy	ADB	50	3.3.5	RE: Urban Design, 4th Bullet - Change "possible" to "feasible", or just delete the extra words so that it only reads "Implement Green Loop element along the following streets that will be Green Loop Connectors into the downtown:"


0	Team	Commenter	Page	Section	Comment
67	Policy	ADB	53	4	<p>The Plan contains no substantive references to Complete Communities despite it being a central component of Thrive Montgomery 2050. It is not clear how this plan is envisioned to achieve the tenets of Complete Communities. (1) What target land uses are expected to be reachable, (2) within what defined timeframes (3) of traveling by what mode?</p> <p>For example: might the plan establish that high-frequency destinations like rec centers, grocery stores, or elementary schools should be within a 15 min walk/roll? And intermediate-frequency destinations like medical clinics perhaps 15 min by bike, or 30 min by walk/roll? And rarer or high-consolidation destinations perhaps 30 min by bike?</p>
68	Policy	ADB	53	4	<p>There are no substantive references to utilities at all in the plan, other than the last bullet on this page. This needs to lay out a vision for utilities: should they be above ground or underground? What developers will be required to underground utilities?</p> <p>Where are utilities envisioned to be located in and along streets? (see also a related comment on p105-106)</p> <p>Testimony at the public hearing on 12/7/2021 cited a purported sewer moratorium. What water / sewer needs face Silver Spring? What are the anticipated energy needs?</p>
77	Policy	ADB	64	4.3.2	<p>RE: 2nd Bullet - What is the purpose of this constraint? What if an applicant comes in along a corridor with little pedestrian activity today, but where we expect there might be significant activity in the future? Or what if the retail itself would be the generator of that pedestrian activity?</p> <p>It feels like this might unnecessarily and broadly constrain retail development & risk creating more blocks that are not adequately activated. Better understanding the purpose of this restriction might allow it to be better tailored toward the actual specific problem.</p>
79	Policy	ADB	67	4.4.1	Tactical Urbanism efforts are to be conducted via the Department of Permitting Services, which will involve other agencies (such as MCDOT) as needed.
80	Policy	ADB	71	4.5.2	RE: 5th Bullet - Reduce font size for consistency
81	Policy	ADB	89	4.6	Consider amending the reference to "Colesville Road (US 29)" as "Colesville Road (US 29 and MD 384)"
82	Policy	ADB	89	4.6	Consider amending the reference to "Georgia Avenue (MD 97)" as "Georgia Avenue (US 29 and MD 97)"
83	Dev Rev	RT	89	4.6.1	Consider adding a goal for improving ADA accessibility of sidewalks in the plan area.
84	Policy	ADB	89	4.6.2	<p>RE: 2nd Paragraph - Delete "side path" from the list of conditions for Protected Intersections, which I don't believe is applicable to sidepaths that are on their own (though I welcome David to inform me otherwise).</p> <p>The other conditions (where there are bike lanes) are fine, and that would already cover areas where there are transitions to/from sidepaths.</p>

0		Team	Commenter	Page	Section	Comment
85		Policy	ADB	89	4.6.2	RE: 2nd Paragraph, Last Sentence - What is meant by "detailed interagency analysis" ? As long as they confirm to the master plan: I believe these analyses would be done entirely by DOT, reaching out to other agencies as needed, and adhering to the Mandatory Referral process if applicable. I just want to make sure this doesn't intend to significantly expand the scope of these analyses, which might complicate things & slow them down.
86		Policy	ADB	90-91	Table 1	Highlight any segments which differ from what has been established by the Bike Master Plan.
87		Policy	ADB	92	4.6.2	Delete the reference to the Corridor Cities Transitway, which isn't applicable to this plan and might only lead to confusion if people think it's something here, or if they confuse it with the similarly-acronymed Capital Crescent Trail.
88	*	Policy	ADB	92	4.6.2	RE: Silver Spring Library Purple Line Station - Confirm the number of short-term bike parking spaces proposed for this site. The Bike Master Plan proposed 10 spaces, and this plan proposes 170 spaces. Is the 170 spaces intentional? It's fine if it is, but I just wanted to make sure considering it's an order of magnitude change.
89		Dev Rev	RT	92	4.6.2	RE: Bikeshare - DOT cannot support Bikeshare with our current stations. Be mindful that due to these limited resources we are no longer requesting bikeshare stations from new developments.
90		Dev Rev	RT	92	4.6.2	RE: Micromobility - The recommendation should specify that concrete pad sites for corrals should be built by new developments. This will improve our ability condition these upon developers.
91		Policy	ADB	93	Map 20	The Green Loop map (p20) shows bikeways along numerous segments that are not reflected in this map & need to be: <ul style="list-style-type: none"> - Houston St - Thayer Ave - A longer portion of Grove St than shown - Sligo Ave - Woodbury Dr - A new bikeway connection between Mayor La & Fenton St, linking Silver Spring Ave & Sligo Ave - A new bikeway across the railroad tracks as an extension of Silver Spring Ave - A more direct path through Jesup Blair Park
92	**	Policy, DTE	ADB, MCJ	93	Map 20	[same comment made on p20] We've confirmed that the full ROW of Eastern Avenue is maintained by DDOT (there was a time when we used to maintain behind the curb, but those responsibilities have shifted). With that in mind: we should make it clear that Eastern Ave is under DC jurisdiction. We could establish that we have an *interest* in a bikeway as a position of advocacy toward the District.
93		Policy	ADB	93	Map 20	Also show bikeways extending into DC, per DC's master plans / MoveDC. In addition to better informing readers, this may highlight points where we might be missing connections on our end as well as locations where we need to advocate to the District for linking into connections that we have provided.


0		Team	Commenter	Page	Section	Comment
94		Policy	ADB	93	Map 20	Use the graphics established by the Bike Master Plan's most recent updates, which shows Sidepaths and Sep Bike Lanes as two different line types & also shows Breezeways.
95	**	Policy	ADB	94	4.6.3	Consider adding a map showing the BPPA and the Urban Area boundaries. RE: 1st Bullet - Phrase this as "high-visibility crosswalks"
96	*	Policy	ADB	94	4.6.3	This allows flexibility in case we provide either continental or ladder crosswalks & also doesn't constrain potential artistic crosswalks. RE: 2nd Bullet - Consider adding to this text to call our ADA accessibility.
97		CSS, Policy	JJC, ADB	94	4.6.3	Many alternative pavements (particularly brick) can easily buckle, become dislodged, or otherwise become uneven & can be difficult to keep maintained for ADA accessibility. Slip resistance is another significant factor in non-concrete pavements. RE: 4th Bullet - I like this phrasing regarding protected crossings. Flag this as template text for future master plan efforts.
98		Policy	ADB	94	4.6.3	... with one small exception: change "Possible treatments" to "Potential treatments"
99	*	Policy	ADB	94	4.6.3	Add a bullet reinforcing Complete Streets guidance that all driveway and alleys should be designed to be at-grade with the Active Zone.
100	*	Policy	ADB	94	4.6.3	Add additional narrative regarding ADA accessibility needs & goals. Consult with the ongoing work on the Pedestrian Master Plan for how this might be expanded upon. Consider noting the recent MWCOG TLC assistance received for purposes of improving ADA accessibility in Silver Spring, particularly focusing on Fenton.
101		Policy	ADB	95	Map 21	This map isn't particularly clear. Consider how it might be turned from a more technical-looking map into something more publicly approachable & usable. RT - Were the crosswalks and protected crossings evaluated based on any specifications?
102		Dev Rev, Policy	RT, ADB	95-96	Maps 21 & 22	ADB - It'd be helpful to see a map highlighting segments that exceed the maximum protected crossings for each street type. Narrative should be provided for any segments that exceed those lengths explaining why those larger spans are considered to be acceptable, or why reducing those spans is considered infeasible.
103		Policy	ADB	97	4.6.4	Consider adding a map showing the Red Line, Purple Line, and BRT lines (including stations), especially as these aren't particularly well highlighted on many other maps. As it's a transit map it might be prudent to also show Regional Buses, Commuter Buses, Express Buses, and Local Buses. Consider mentioning all of the local/express bus lines serving Silver Spring, perhaps hyperlinking to their respective websites.

0		Team	Commenter	Page	Section	Comment
104		Policy	ADB	97	4.6.4	<p>The Transit section doesn't mention MARC nor the Purple Line at all.</p> <p>It should highlight MARC's successes, needs, and reiterate longstanding policy supporting two-way all-day and weekend MARC service.</p> <p>It should at least highlight that the Purple Line is coming and include recommendations on how the plan might make the best use of it (potentially summarizing any recommendations out of Chapter 3)</p>
105		Policy	ADB	97	4.6.4	<p>Provide narrative toward Regional, & Commuter Buses. The Transit Center is a major hub of both, and there might be other stops in the downtown. What's the vision for these? Do we want to foster more bus services? Do they have any particular needs or desires? Will the Transit Center be able to operate adequately to achieve the plan's vision?</p>
106		Policy	ADB	97	4.6.4	<p>RE: 1st Bullet - Need to better delineate the segments' boundaries here. In what direction along Colesville from the Transit Center: North? South? Both?</p> <p>And similarly with Georgia Ave: what are the boundaries of these lanes: the full length of Georgia within the plan area? Or only a portion of Georgia?</p>
107		BRT	DBB	97	4.6.4	<p>RE: 1st Bullet - Was any consideration given to dedicated bus lanes south of the SSTC to the district line? This could be useful for DC/MD connections, including Walter Reed redevelopment.</p>
108	**	Policy	ADB	97	4.6.4	<p>RE: 4th Bullet - Service to/from Walter Reed specifies Ride-On, VanGo, *AND* a private shuttle. What is being sought here beyond what is and would already be provided by the S buses, 70, 79, and private shuttle? What goals is this potentially duplicative County service seeking to accomplish?</p> <p>Is this intended to deliberately restrict this recommendation to County services only? What if this instead focuses on something like expanding WMATA Metrobus services, DC Circulator services, and potentially County services or services developed in partnership between the multiple jurisdictions &/or private stakeholders?</p>


0		Team	Commenter	Page	Section	Comment
109	**	Policy, Dev Rev	ADB, RT	97	Figure 27	<p>There are many issues with this cross-section:</p> <ul style="list-style-type: none"> - (ADB) It only applies for a 1 block span (between Georgia & 2nd/Wayne). What is envisioned where there is another bikeway called for on the other side? - (ADB) Table 2 on p101 doesn't call for any Transit Lanes at all, which conflicts with this figure as well as narrative on this page. - (RT) The figure shows only a southbound bus lane. Is this the intention, or is it meant to be reversible? Or should there be a bus lane also in the northbound direction? - (ADB) The dimensions and prioritization of features does not reflect the Complete Streets Design Guide. - (ADB) This appears to be very focused on motor vehicles for a plan that aspires to be more focused on peds, bike, and transit. I think we can be more ambitious than this.
110	**	Policy	ADB	98	4.6.5	<p>As we have discussed Shared Streets (in the vein of Woonerfs) several times in development of this plan, I was surprised to find that there do not appear to be <i>*any*</i> shared streets proposed; this notably includes Ellsworth which is arguably a shared street today (though admittedly not a particularly ideal design for one).</p> <p>We had suggested that this plan consider pitching a more widespread and systematic application of Shared Streets as an initial proposal, it feels underwhelming to find that this plan does not recommend any at all, not even along the new streets, and in fact appears to remove the one Shared Street that exists today.</p> <p>I strongly encourage that this plan take a more deliberate look at shifting Silver Spring away from a car-centric environment, and note that in testimony on 12/2/2021 this path appears to be one of the few topics that the dominant factions for & against this plan actually agreed on.</p>
111		Policy	ADB	98	4.6.5	<p>As several other recommendations of this plan focus on converting existing streets into ped/bike/park space, affirm that the vision of this plan is indeed to construct these proposed new connections as streets, as opposed to ped/bike connections that might also function as linear parks.</p>

0		Team	Commenter	Page	Section	Comment
112	**	Policy	ADB	98	4.6.5	<p>RE: 1st Bullet - This appears to be the only new alley that is recommended by the plan. Thrive, however, establishes a vision where alleys are used more predominantly for access. Consider whether this plan should be recommending more alleys & better defining existing alleys.</p> <p>Issues to consider are ensuring adequate ROW for loading, thru-connectivity, and endpoints of each alley. Alleys are defined as being primarily for vehicle access, and any alleys where the primary purpose is more as a recreational space (such as Arts Alley) should be considered for designation as Shared Streets, or if no vehicular access is necessary they should perhaps be classified exclusively as walkways or bikeways.</p>
113		Policy	ADB	98	4.6.5	RE: 5th through 8th Bullets - Indent these as sub-bullets of the 4th Bullet.
114		Policy	ADB	98	4.6.5	RE: 5th through 8th Bullets - The 8th bullet is already called out as a flexible street by the 3rd Bullet. Why is it included here, but the flexible street called for by the 2nd Bullet isn't? Is this just an oversight, or is there some intention here that needs to be made clearer?
115		Policy	ADB	98	4.6.5	<p>RE: Last Bullet - As Blair Road is a public road, it cannot be simply restricted to residents and park users only. The intended action here appears to be on evaluating potential access restrictions, presumably focused on reducing or eliminating cut-through traffic.</p> <p>However, such a recommendation should be made with the overt acknowledgement and awareness that this would shift this traffic onto Eastern Avenue NW. Given that Blair Rd is a continuous street linking major activity centers in each direction & Eastern Avenue NW / Kalmia Rd NW is essentially a small neighborhood street with little connectivity: I do not believe this would be a good course of action.</p> <p>I would instead suggest that Blair Road be highlighted as a focus point for a Complete Streets reconstruction and traffic calming features such that while traffic might itself not be restricted, the vision is that those using the roadway would feel it so be safe, accessible, and comfortable.</p>
116		Policy	ADB	98	4.6.5	RE: Last Bullet - Any references to a Metro station should be made in the Transit section (p97, 4.6.4). Hidden in the Roadways section is not the proper place for such a significant proposal.

0	Team	Commenter	Page	Section	Comment
117	Policy	ADB	98	4.6.5	<p>RE: Last Bullet - As this narrative alludes to: an infill Metro station will absolutely not be justifiable with the densities present on both sides of the railroad tracks. If this plan intends to begin a path toward a future Metro station it needs to do one of the following:</p> <ul style="list-style-type: none"> - Significantly increase densities of properties on the Silver Spring side of the tracks, potentially conditional on some to-be-determined staging triggers associated with implementation of a Metro Station. And acknowledge the need to similarly upzone the Takoma Park side as part of a future master planning effort. Noting the age of the Takoma Park Master Plan (2000), a revisit of the master plan for this area might be prudent not long after the current Takoma Park MMPA effort is completed. - Establish a right-of-way footprint of the Metro Station as a conditional requirement on any adjacent development, noting that this may require reassigning portions of Jesup Blair Park to this right-of-way. This may allow a slow-paced accumulation of right-of-way & future master planning efforts might then pursue increased densities. If the Plan envisioned an infill Metro Station then this would not be my preferred option, as it wavers on commitment & risks nothing happening for likely ~40 years, at a minimum.
118	** Policy	ADB	98	4.6.5	<p>Past discussions had supported consideration of removing the reversible / dynamic lanes along Colesville Road as part of repurposing toward transit lanes, but this plan appears to not mention the reversible / dynamic lanes at all. Add a bullet regarding these lanes & tying it into the transit vision.</p>
119	Policy	ADB	98	4.6.5	RE: Last Bullet - Change "for possible closure" to "for potential closure"
120	Policy	ADB	99	Figure 29	Show two different line types: one for the extension of 1st/Ramsay and the other for the alley.
121	Policy	ADB	99	Figure 29	Need better clarity as to the intent of the alley: is it envisioned to fully connect Second Ave and Georgia Ave (which I would not support) or is it intended to only be accessed via First/Ramsay (which I would be more favorable of)? If the latter: delete the arrow endpoints to the line. You may also need to expand narrative on p98 to reflect whatever is intended here.
122	Policy	ADB	100	Map 23	Provide an additional map with Complete Streets designations, as that map is what will be primarily used into the future.
123	Policy	ADB	100	Map 23	The line for Light Rail is difficult to discern, particularly when it is along streets. This may not be an issue if a separate Transit Map is prepared, per a my comment on p97

0		Team	Commenter	Page	Section	Comment
						<p>Identify any segments that have new ROWs proposed or that have new infrastructure demands placed upon them since the 2000 Silver Spring plan (such as changes from this plan, the MPOHT, or the Bike Plan). The bolded segments do not appear to reflect all of these streets.</p> <p>Then review any such segments under the 2021 Complete Streets Design Guide to confirm that the Minimum ROWs are capable of adequately supporting all desired infrastructure.</p>
124	**	Policy	ADB	101-104	Table 2	<p>(as previously offered: I am happy to help with that 2nd part, but first request your staff narrow down what segments we need to critically look at. At this time I have not reviewed any of these for CSDG adequacy other than the cross-sections included on p105-106)</p> <p>It's admittedly unlikely the full width CSDG ROW will be feasible on many (or any) streets. The Prioritization methodology can help reduce cross-sections to fit within available rights-of-way, and can help understand what will be reduced or cut entirely from a cross-section unless ROW is expanded. As lane widths have already been narrowed to their minimums as the default condition in CSDG: cuts will tend to first target on-street parking & then target Active Zone infrastructure. That includes potential impacts to areas envisioned for SWM.</p>
125		Policy	ADB	101-104	Table 2	<p>Given the complexity of Table 2, strongly consider adding a ROW map as like the 2000 plan: https://www.montgomeryplanning.org/community/plan_areas/silver_spring_takoma_park/master_plans/sscbd/maps/rec_circulation_map34.pdf</p>
126		Policy	ADB	101-104	Table 2	<p>Consider merging the Bikeways table and Streets tables together. This might necessitate a landscape-oriented page, but would help ensure all the info is readily available in one place. That would make this MUCH more functional & usable.</p>
127		Dev Rev	RT	101	Table 2	<p>Master Planned ROW column should include the word "minimum"</p>
128		Policy	ADB	101-104	Table 2	<p>Add a footnote applicable to the Master Planned Minimum ROW column on each page with the following footnoted text:</p> <p>"Minimum rights-of-way do not include lanes for turning, parking, acceleration, deceleration, or other purposes auxiliary to through travel. Additional rights-of-way may also be needed to accommodate master planned bicycle and transit facilities, including Protected Intersections, the envelopes of transit stations, and pedestrian crossing refuges. Rights-of-way are considered by default to be measured symmetrically based upon right-of-way centerline."</p>
129		Policy	ADB	101-104	Table 2	<p>Consider adding a column for Target Speeds, or otherwise provide narrative somewhere affirming the default Target Speeds called for by the Complete Streets Design Guide.</p>

0	🔍	Team	Commenter	Page	Section	Comment
130	**	Policy, Dev Rev	ADB, RT	101	Table 2	<p>It's unclear what is intended by all of the OT entries. Are no transit lanes proposed along many of these facilities, despite the column designating dedicated BRT lanes?</p> <p>It also appears that these same entries keep the same number of planned thru lanes as existing lanes, which would complicate future lane repurposing efforts. This seems to conflict with narrative in many locations elsewhere in the document as well as the major vision of the plan.</p> <p>As written, if lane repurposing were justified, based on Table 2 we would not be able to repurpose thru lanes to transit lanes without becoming non-compliant with this plan. The information here needs to change if the plan wants to see lane repurposing ever happen.</p>
131		Policy, Dev Rev	ADB, RT	101	Table 2	Note that under the current Growth & Infrastructure Policy it may be difficult to justify lane repurposings, as with the current target metrics and analysis methodologies it can potentially be difficult to achieve passing metrics. We will reiterate our interests in new analysis methodologies as part of the 2024 Growth & Infrastructure Policy update.
132		Policy	ADB	101	Table 2	Need more clarification on Georgia Ave (M-8) between Wayne & Blair Mill as to how the 125'-140' ROW is applied. Where is nearer to 125', and where is nearer to 140'?
133		Policy	ADB	101	Table 2	The number of existing lanes for M-20 between Blair Mill & Georgia is "4-Feb"; I'm pretty sure this should be "2-4"
134		Policy	ADB	101	Table 2	Confirm that Spring St (A-263) between the RR Bridge and 1st St is intended to be widened to 4 travel lanes. This seems at odds with the vision of the plan. What is the purpose of this widening, especially noting that there is a 2-lane span between 1st and Fairview?
135	*	Policy	ADB	101	Table 2	<p>The three segments of E-W Hwy (M-20) do not appear to show any road diets, but the cross-section on p106 does show a road diet. There is a conflict here, which is likely to cause MDOT SHA to err on the side of keeping the status quo.</p> <p>If the Plan wants to see a road diet along E-W Hwy: the info in Table 2 needs to reflect that.</p>
136	*	Policy	ADB	101	Table 2	A road diet is shown along most of 16th St (M-9), except for the span between E-W Hwy and Colesville Rd. Consider extending the road diet to this span, as well. Previous efforts at MDOT SHA have established that this segment could operate as 4 lanes (it's already 2 northbound exiting Blair Circle).
137		Policy	ADB	102	Table 2	Confirm that Spring St (A-263) between Fairview Rd and Colesville Rd is intended to be widened to 4 travel lanes. This seems at odds with the vision of the plan. What is the purpose of this widening, especially noting that there is a 2-lane span between 1st and Fairview?
138		Policy	ADB	102	Table 2	Need more clarification on Wayne Ave (A-76) between Georgia & Sligo Creek as to how the 70', 80', 100', and 110' ROWs are to be applied.
139		Policy	ADB	102	Table 2	We should discuss the Complete Streets Street Type for Wayne Ave with Stephen Aldrich and David Anspacher. I'm unsure whether this might be a Downtown Boulevard or a Downtown Street; I think there's an argument either way and we should figure that out.
140		Policy	ADB	102-104	Table 2	I can't figure out in what order the Business Streets are in. They don't appear to be in alphabetical nor numerical order. Please organize these by a more apparent methodology.

0		Team	Commenter	Page	Section	Comment
142		Policy	ADB	103	Table 2	Need to ensure Bonifant has adequate ROW for a ped-friendly retail corridor alongside the Purple Line with sidewalk cafes & street trees, as recommended on p28
143		Policy	ADB	103	Table 2	Unclear what is intended with Colonial Ln (B-9), which has N/A Proposed Lanes.
144		Policy	ADB	103	Table 2	Need more clarification on Bonifant St (B-7) between the Purple Line and Fenton St as to how the 40-70' ROW is applied. Where is nearer to 40', and where is nearer to 70'?
145	**	Policy	ADB	104	Table 2	Assign rights-of-way to the four new streets. The Alley will be easy (20') and the others should use Complete Streets as a guide. For reference, the default street width for a Downtown Street anticipated with our updates to Chapter 49 is proposed to be 100', but this master plan should take a more deliberate approach for each street.
146		Policy, Dev Rev	ADB, RT	105-106	Figures 31-35	Note the location of the existing curb & utility lines in each cross-section, which may affect the cross-section designs as well as Fiscal Impact estimates. (see also a related comment on p53)
147		Policy	ADB	105-106	Figures 31-35	Do not show foliage imagery in any buffers less than 4' wide. These would not be viable planting areas. Only small trees can be grown in planting areas between less than 6' wide.
148	**	Policy	ADB	105	Figure 31	Disregarding the locations of existing curbs, under Complete Streets a 70' section might instead consist of: <ul style="list-style-type: none"> - 10.5' Travel Lanes - no parking - 6' Street Buffers (trees) - 6.5' One-Way SBLs - 2' Ped-Bike Buffers - 8' Sidewalks - 2' Frontage Zones adjacent to structures If parking is considered absolutely necessary this could be accommodated as: <ul style="list-style-type: none"> - 10.5' Travel Lanes - one 11' combined Street Buffer / Parking Lane (trees) - one 6' Street Buffer (trees) - 5' One-Way SBLs - 2' Ped-Bike Buffers - 8' Sidewalks - 1' Frontage Zones adjacent to structures (sub-standard; new structures would need to be set 1' back from Property Line)

0	Team	Commenter	Page	Section	Comment	
149	**	Policy	ADB	105	Figure 32	<p>Disregarding the locations of existing curbs, under Complete Streets a 70' section might instead consist of:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - no parking - 6' Street Buffers (trees) - one 11' Two-Way SBL - one 3' Ped-Bike Buffers - 9.5' Sidewalks - 2' Frontage Zones adjacent to structures <p>If parking is considered absolutely necessary this could be accommodated as:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - one 11' combined Street Buffer / Parking Lane (trees) - one 6' Street Buffer (trees) - one 9' Two-Way SBL - one 3' Ped-Bike Buffer - 8' Sidewalks - 2' Frontage Zones adjacent to structures
150		Policy, Dev Rev	ADB, RT	105	Figure 32	Why aren't trees shown in the 7' and 6' Street Buffers?
151	**	Policy	ADB	106	Figure 33	<p>The bike facilities shown don't appears to match the Bike Facilities recommended by the plan, which per p91 appears to be a sidepath on the south side (also, the Sep Bike Lane shown only travels in one direction). With that in mind, and disregarding the locations of existing curbs, under Complete Streets a 60' section might instead consist of:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - 6' Street Buffers (trees) - one 11' Sidepath - one 10' Sidewalk - 3' Frontage Zones <p>If parking is considered absolutely necessary this could be accommodated as:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - one 11' combined Street Buffer / Parking Lane (trees) - one 6' Street Buffer (trees) - 9' Sidewalks - 2' Frontage Zones

0		Team	Commenter	Page	Section	Comment
152	**	Policy	ADB	106	Figure 34	<p>Disregarding the locations of existing curbs, under Complete Streets a 74' section might instead consist of:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - no parking - 6' Street Buffers (trees) - 6.5' One-Way SBLs - 3' Ped-Bike Buffers - 9' Sidewalks - 2' Frontage Zones adjacent to structures <p>If parking is considered absolutely necessary this could be accommodated as:</p> <ul style="list-style-type: none"> - 10.5' Travel Lanes - one 11' combined Street Buffer / Parking Lane (trees) - one 6' Street Buffer (trees) - 5' One-Way SBLs - 3' Ped-Bike Buffers - 8' Sidewalks - 2' Frontage Zones adjacent to structures
153		Policy	ADB	106	Figure 34	Why aren't trees shown in the 6' Street Buffer?

0		Team	Commenter	Page	Section	Comment
154	**	Policy	ADB	106	Figure 35	<p>The bike facilities shown don't appear to match the Bike Facilities recommended by the plan, which per p91 appears to be two-way SBL on the north side (west of Colesville) or TBD side (east of Colesville). With that in mind, and disregarding the locations of existing curbs, under Complete Streets a 100' section might instead consist of:</p> <ul style="list-style-type: none"> - one 10' Turn Lane - 11' Travel Lanes - no parking - 8' Street Buffers (trees) - one 11' Two-Way SBL - one 6' Ped-Bike Buffer (trees) - 15' Sidewalks - 2.5' Frontage Zones adjacent to structures <p>If parking is considered absolutely necessary this could be accommodated as:</p> <ul style="list-style-type: none"> - one 10' Turn Lane - 11' Travel Lanes - one 8' Parking Lane - 8' Street Buffers (trees) - one 11' Two-Way SBL - one 3' Ped-Bike Buffer - 13' Sidewalks - 2' Frontage Zones adjacent to structures
155	***	Policy	ADB	107-108	4.6.5	<p>We will look forward to the results of the transportation analysis and are willing to assist in any way we can. In addition to the metrics listed from the Growth & Infrastructure Policy we will be interested in suggestions at how this plan will seek to achieve Vision Zero.</p>

0	Team	Commenter	Page	Section	Comment	
					<p>While some recommendations in Section 3 call out some sites as potentially proceeding with no parking (instead utilizing the PLD), there does not appear to otherwise be any significant approach to parking policy in this plan. Silver Spring is well known for its many buildings with parking taking over many of the first several above-grade levels. At the least, this plan should press for below-grade parking or facilities that are masked by other uses.</p>	
156	***	Policy	ADB	108	4.6.6	<p>The PLD facilities should not be viewed as negatives against the urban vision, rather they exist specifically to *further* the urban vision. PLD facilities are intended to reduce the prevalence and reliance on parking across each individual property, and this plan should make better use of the PLD assets by more severely restricting parking options for new developments. Consider parking maximums or other innovative policies/tools.</p> <p>PLD facilities -- particularly those at the periphery -- can potentially be used to catch inbound motor vehicles and convert them into ped/bike/transit trips within the urban core (ADA access would have to remain an important consideration). A more ambitious plan might take greater advantage of these assets, enabling itself to take on a more ped/bike/transit focused effort within that core.</p> <p>This should include a better vision for how to utilize these facilities to further the plan's vision.</p>
157	*	Policy	ADB	108	4.6.6	<p>This should provide substantially more information on Freight:</p> <ul style="list-style-type: none"> - Could curbside strategies affect loading bay requirements? - Should we require buildings to provide concierge services capable of accepting bulk deliveries, reducing time needed for delivery drivers at any one building? - What are the best practices for Urban Consolidation Centers / micro-distribution hubs, and how have they succeeded or failed such that we could make best use of them in Silver Spring?
158		Parking	BHM	108	4.6.6	Change to "3" lots
159		Policy	ADB	108	4.6.6	RE: Last Bullet - Typo; I think it should read "Improve education and enforcement to increase compliance."
160		Policy	ADB	109	Map 24	Use a border for the Parking Lot District instead of the shaded area, which is difficulty to discern under the buildings layer.
161		CSS	JJC	110	4.6.7	This section appears to use TDM and TMD interchangeably: "Currently, most of downtown Silver Spring is located within a TDM boundary that is monitored." Should this be TMD? TDM is the strategy, but the TMD is the physical boundary. Also: 'This plan recommends that the TDM boundary be expanded to align with the Parking Lot District (PLD) boundary."

0		Team	Commenter	Page	Section	Comment
162		Policy	ADB	111	4.7	Given this plan's and Thrive's focus on Climate Resiliency, in this section I'd ideally like to see an analysis of the watershed's drainage structures, paired with an evaluation of the increasing frequency of Design Year Storms. (that is: I believe we've had several 100 Year Storms in recent memory, despite them nominally supposed to occur only once every 100 years on average)
163		Policy	ADB	111-119	4.7	Need to ensure adequate ROW for all of these features. See comments on p101-104
168		Policy	ADB	120	4.8.1	RE: Recommendations, 1st Bullet - Consider amending this to read "Ensure consistent street lighting as well as lighting at bus stops...", and at the end of the sentence change "when walking at night" to "when traveling at night".
171		Policy	ADB	131	Map 28	I believe this plan is creating a *new* historic site for Jesup Blair Park, but there does not appear to be any narrative in this chapter as to what exactly that entails, and whether that might affect implementation of the ped/bike infrastructure, the Metrorail station, & other visions for the park site.
172		Policy	ADB	140	5	There are multiple references throughout the plan to a Connectivity and Infrastructure Fund without any apparent elaboration on what this fund is, who administers it, what it can be used for, etc. Is this a replacement of the Unified Mobility Program (UMP) ? If so- how does it differ as to justify using a different name?
173	***	Policy	ADB	140	5	I want to remind of the expectation that this plan enact the Silver Spring UMP concurrent with plan approval. I believe all of the work will have already been accomplished as part of the plan's regular efforts: it already identifies capital needs, other than what might be identified as part of the ongoing transportation analysis. And transit needs for achieving the NADMS may not be applicable, as the Existing NADMS (54%) is near enough to the target (55%) that I believe background efforts & the plan's proposals will more than achieve that target. So in the end that just means identifying the capital projects to include, dividing by development, and establishing that fee (or Special Taxing District, Development District, etc... whatever you feel best suits the plan)
174		Policy	ADB	140	5.1.1	Can redevelopment of public properties (notably PLD lots) take advantage of the Building Height Incentive Zone? How would this work?
175		Policy	ADB	140	5.1.1	RE: Last Bullet - Will the height & density metrics bias in favor of larger-area properties, where every additional foot of height significantly expands the volume of space? As compared to a smaller site, where each additional height has a smaller effect on developable area?

0	Team	Commenter	Page	Section	Comment
177	Policy	ADB	146	5.3	<p>[Part 1] Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through (that is: they should not be considered a comprehensive list, especially my focus tends to be only on transportation projects):</p> <ul style="list-style-type: none"> - Connectivity & Infrastructure Fund (p15) - World-Class Arrival Experience at the Transit Center (p15) - New Bridge (or connection) across railroad tracks (p15,36) - Strategic Utility and Streetscape Infrastructure Improvements (p15) - Green Loop: Central, Outer, and Connectors (p15, 19-20, 32) - Green Loop wayfinding (p21) - Green Loop Smart Street Elements (EV charging stations, solar metering & lighting) (p21,119) - New & Enhanced Parks & Open Spaces (p15) - New ped/bike connection between Dixon/Silver Spring and E-W Hwy (p23) - Additional lighting, art, and safety treatments along Georgia Ave underpass (p24)
178	Policy	ADB	146	5.3	<p>[Part 2] Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through (that is: they should not be considered a comprehensive list, especially my focus tends to be only on transportation projects):</p> <ul style="list-style-type: none"> - Widen bridge/ramp for ped bridge at Mont College / Jesup Blair Park to provide bike access (p24,40) - Ellsworth "flexible street" upgrades (p25) (these might be private costs) - Silver Spring Shopping Center parking lot treatments (p25) (these might be private costs) - Redevelopment of Public Garage 4; provision of cross-streets, park, green roof (p29) - Redevelopment of Public Lot 29 (p29) - Sponsor charette for design of a world-class transit center (p32) - Redevelopment of Public Garage 5/55; provision of park (p33) - Create a sense of arrival w/ clear ped connection along Bonifant btwn Georgia & Transit Center (p36) - Redevelopment of Public Garage 7 (p45) - Redevelopment of Public Garage 2 (p45)

0	Team	Commenter	Page	Section	Comment	
179	Policy	ADB	146	5.3	<p>[Part 3] Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through (that is: they should not be considered a comprehensive list, especially my focus tends to be only on transportation projects):</p> <ul style="list-style-type: none"> - Public art & wayfinding along Fenton St (p79) - Temporary recurring or permanent closures of Blair Road by Juniper Blair Park (p79) - New 1-way SBLs or conv bike lanes along Silver Spring Ave btwn Georgia & Fenton (p89) - New SBLs along Blair Mill Rd btwn Eastern & EW Hwy (p89) - New SBLs along King St btwn Eastern & Georgia (p90) - Upgrade Fenton St SBL to a Breezeway btwn Ellsworth & King St (p90) - Junctions between the Metropolitan Branch Trail / Capital Crescent Trail and Green Loops - Universal continental crosswalks (p94) - Construct sidewalk to fill sidewalk gaps (should enumerate list) (p94) - New protected crossings (x16; need to enumerate) (p94) - New protected intersections (need to enumerate) (p89) - New crossing across RR between Apple Ave & Falklands North (p94) 	
180	Policy	ADB	146	5.3	<p>[Part 4] Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through (that is: they should not be considered a comprehensive list, especially my focus tends to be only on transportation projects):</p> <ul style="list-style-type: none"> - Dedicated bus lanes along Colesville north of SSTC (p97) - Dedicated bus lanes along Georgia (p97) - Upgrade all bus stops w/ shelters & realtime displays (p97) - Expanded VanGo service to Jesup Blair Park and Woodside Urban Park (p97) - Connect Silver Spring & Walter Reed with Ride-On, VanGo, and Walter Reed Shuttle (p97) - Extend 1st/Ramsay together (p98,99) - New street linking Bonifant & Thayer (p98,99) - New street linking Silver Spring & Sligo (p98,99) - New ped/bike connection linking Georgia and Fenton (p98,99) - Potential closure / access restrictions of Blair Rd (p98) - Street Reconstructions (need to enumerate) (p101-106) - Assign a Curbside Management task (p108) - Reallocate space w/in underutilized garages to serve as micro-distribution hubs (p108) - Expanded education (p108) - Expanded enforcement (p108) 	
181	Policy	ADB	146	5.3	Consider adding a column that includes page references, listing each page where the project is substantially referenced.	
182	Policy	ADB	148	5.5	RE: 2nd Bullet - I think there's a typo... it's unclear what "by increasing capacity improve" should be	
183	*	Policy	ADB	148	5.5	Need to ensure Urban District is capable of adequately maintaining street features anticipated to fall within their responsibilities
185	Parking	BHM	150	5.5.3	Change to "three" surface lots	

Marc Elrich
County Executive



Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

MEMORANDUM

December 10, 2021

TO: Casey Anderson, Chair
Planning Board

FROM: Hannah Henn, Deputy Director for Transportation Policy
Department of Transportation (MCDOT)

SUBJECT: Silver Spring Downtown and Adjacent Communities Plan
Public Hearing Draft – MCDOT Comments

Thank you for the opportunity to review the Fall 2021 Public Hearing Draft for the Silver Spring Downtown and Adjacent Communities Plan (“the Plan”). We strongly support the vision of the Plan and believe Silver Spring has the potential to become a renowned example of infrastructure centered on pedestrians, bicycling, and transit but are concerned that the Plan’s recommendations do not adequately support the intended vision.

The comments below summarize MCDOT’s most significant concerns related to the ability to achieve the Plan’s vision. Many of these comments have been made previously by our staff as they coordinated with Planning staff throughout the year. Footnotes in this memo are used to reference comments in our detailed technical comments which we plan to transmit to you on Monday, December 13. I will note there are a significant number of detailed comments, and our staff are, as always, available to assist in discussing these comments further as your staff considers modifications to the draft.

- 1) **Transportation Analysis:** We look forward to reviewing the transportation analysis when it becomes available. Our interests will be focused on how the Plan achieves the metrics defined by the Growth & Infrastructure Policy, including how the Plan furthers Vision Zero efforts.

- 2) **Transportation Vision:** During the scoping process MCDOT had suggested that the Plan incorporate a more widespread and systemic approach to shared streets. As a result, we were surprised to find that the Plan did not appear to include any shared streets at all and, in fact, appears to revert Ellsworth Drive into a more conventional street.¹¹⁰ Similarly, most of the new street connections proposed also appear to be proposed as conventional streets, as opposed to shared streets or pedestrian/bicycle connections.¹¹¹ The Plan would also benefit from additional connections, such as a pedestrian/bicycle promenade or shared street parallel to East-West Highway.⁵⁷

There does not appear to be a narrative addressing the existing reversible/dynamic lanes along Colesville Road,¹¹⁸ and conflicting information makes it unclear whether transit lanes are proposed in lieu of these reversible lanes.¹³⁰ A road diet appears to be proposed along most of 16th Street but stops short of including a road diet along the segment south of East-West Highway. MDOT SHA has previously demonstrated interest in reducing this other segment, and the Plan misses that potential opportunity.¹³⁶

- 3) **Thrive:** Several key components proposed as part of the parallel Thrive Montgomery 2050 effort are notably missing from the Plan. There does not appear to be any reference to Complete Communities. Are there important land use types that are not currently available to the Plan area? And how would the Plan propose to achieve these?⁶⁷

Thrive's Action List of Resources includes recommendations to develop an alley network, yet, apart from one proposed alley, the Plan does not appear to include any significant proposal on how to achieve a stronger alley network in Silver Spring, nor account for existing alleys and needs.¹¹²

The Plan also does not appear to include any information on the watersheds' drainage structures and the increasing frequency of Design-Year Storms, which would be a good fit for the "Resilient Downtown" section and align with Thrive's efforts toward climate resiliency.¹⁶²

- 4) **Parking & Freight:** With only one page covering both Parking and Loading, the Plan does not provide enough information on potentially important and transformative components of achieving the vision.

Instead of impediments to the urban vision, Parking Lot District assets should be used as tools that can enable this plan to push more apparent actions toward constraining the parking supply. Possible examples include site design requirements to screen parking or situate it below grade, or parking maximums.¹⁵⁶

The Plan should consider how curbside strategies might affect development design, as well as how development design might affect curbside strategies. It would be helpful to include additional guidance on how to optimally implement Urban Consolidation Centers / micro-distribution centers.¹⁵⁷

- 5) **Rights-of-Way:** MCDOT will need to work with the Planning team to identify which segments need to be considered more closely to ensure that they can accommodate all new infrastructure proposed since the 2000 Silver Spring CBD Plan, including new infrastructure proposed by this plan (such as green infrastructure and café seating), the Bicycle Master Plan, and any other plans can fit within the master planned rights-of-way under the guidance proposed by the Complete Street Design Guide.^{18,19,86,124,142,163} MCDOT's detailed comments include a number of suggestions on how to improve the specific cross-sections provided in the Plan to better reflect Complete Streets.^{109,124,146,148,149,151,152,154}

Additionally, there are several street segments that do not have rights-of-way assigned.^{143,145} A map of rights-of-way (as was included in the 2000 Plan) would be helpful to make this information easier to understand and access in a useful way.¹²⁵

- 6) **Transit:** Considering the opportunities of the Plan area, we believe the transit section should be expanded, ideally including a map focused on transit services serving Silver Spring.¹⁰³ It should include recommendations for increased MARC service as well as recommendations on how the Plan might make the best use of the Purple Line.¹⁰⁴ This section should provide more information on buses, particularly regional and commuter buses.¹⁰⁵ Information currently included about connections to Walter Reed is confusing, does not reflect past discussions MCDOT has had with Planning staff, and would benefit from greater clarity of the purpose and need for what is proposed. Improving Metrobus service may be a more effective means of connecting to Walter Reed than providing new County bus services.¹⁰⁸

- 7) **Infill Metrorail Station:** If an infill Metrorail Station is proposed by Jesup Blair Park, the Plan must make a more overt effort toward seeing this station realized. Right-of-way needs should be identified, and intention to substantially increase densities in the vicinity of the proposed station should be clarified.¹¹⁷ This proposal should also be mentioned in the Transit section instead of the Roadways section.¹¹⁶ Without a much stronger effort to justify this station, it is unlikely that it would ever be realized.
- 8) **Utilities:** There are few substantive references to utilities in the Plan. The Plan should establish a vision for utilities, such as whether they're envisioned to be above or below ground, where in a street cross-section they are envisioned, what conditions might be set upon new developments, and what the current and forecast needs are.⁶⁸
- 9) **Connectivity & Infrastructure Fund; UMP:** There are multiple references to a Connectivity & Infrastructure Fund without any apparent elaboration on what this fund is, who administers it, what specific projects it can be used for, etc. It is unclear whether this concept is complementary to, or if it replaces the Unified Mobility Program (UMP).¹⁷²

MCDOT reiterates our interest that the Plan concurrently establish an UMP for the project area to maximize potential funding resources to support implementation of the Plan. We believe the Plan will have identified all needed infrastructure for the Plan area, and it should be able to enact an UMP with the information already at-hand. Implementing this UMP concurrent with the master plan may avoid some of the implementation challenges previously experienced in White Oak and Bethesda.¹⁷³

- 10) **Conflicting Information:** The Plan includes conflicting information in a number of areas, perhaps most notably regarding transit lanes. While the narrative strongly establishes an interest in transit lanes, the Streets Table does not recommend any new transit lanes at all,¹³⁰ and the one cross-section showing transit lanes only shows a single non-reversible lane in one direction.¹⁰⁹

Similarly, a cross-section of East-West Highway shows a road diet but the Streets Table does not show any such road diets.¹³⁵ Inversely, the Plan appears to paint a vision for narrower streets, yet it appears to propose a widening of Spring Street from 2 to 4 lanes without any narrative supporting this recommendation.^{134,137}

The Bike Map and the Green Loop Map do not match.⁹¹ One street where they do not match is along Eastern Avenue NW. While it is a District-owned roadway, we feel a bikeway connection here has such potential benefits that the Plan might be justified in recommending a bikeway as a matter of advocacy for the District's consideration.^{17,92}

- 11) **Height Limits, FARs:** Please consider increasing or eliminating height and FAR restrictions, or perhaps do so in a limited capacity in areas more central to the downtown core.² We specifically urge that this change be considered for all public properties to speed implementing redevelopments and associated improvements on such sites.³

- 12) **Railway Crossings:** We strongly urge a connection linking Apple Avenue with North/East Falkland Lane.⁶⁴ This and the other new connection proposed across the railroad tracks should allow for construction either above or below the tracks²³ and should include language as to how these connections might be implemented as part of private developments.²⁴ Consider also an extension of the Silver Spring Metrorail's south mezzanine to cross over the railroad tracks to provide direct connectivity with the MARC platforms and improve any connections not included in the Purple Line project.²⁵

- 13) **ADA Accessibility:** The Plan should include more detailed information related to improving access for persons with disabilities.^{83,97,100}

- 14) **Blair Road:** The recommendations to close or restrict Blair Road need refinement. Our detailed comments include suggestions that may better achieve the Plan's apparent goals.¹¹⁵

- 15) **CIP Table:** The Capital Improvement Program table appears to be missing a substantial number of projects. MCDOT review identified most of the missing transportation projects, though there are many non-transportation projects that we did not include in our comments but also appear to be missing from the CIP Table.^{177,178,179,180}

Should you have any questions regarding our comments on the Plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at andrew.bossi@montgomerycountymd.gov.

HH:AB

cc: Chris Conklin, MCDOT
Gary Erenrich, MCDOT
Andrew Bossi, MCDOT
Meredith Wellington, CEX

From: [Margolies, Atara](#)
To: [MCP-Chair](#)
Subject: FW: MCDOT Comments on Draft Silver Spring Plan
Date: Monday, December 13, 2021 2:25:38 PM
Attachments: [Silver Spring Plan - Public Hearing Draft Comments.pdf](#)
[2021 12 13 - Public Hearing Draft Comments \(Bossi\).xlsx](#)

Atara Margolies, AIA, LEED AP
Planner Coordinator

Montgomery County Planning Department
2425 Reedy Drive, Wheaton, MD 20902
Atara.Margolies@montgomeryplanning.org
p: 301.495.4558

From: Bossi, Andrew <Andrew.Bossi@montgomerycountymd.gov>
Sent: Monday, December 13, 2021 1:42 PM
To: Margolies, Atara <Atara.Margolies@montgomeryplanning.org>
Subject: FW: MCDOT Comments on Draft Silver Spring Plan

[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Hi Atara! Our top comments on the SSD&AC Plan were transmitted on Friday (below + attached pdf) and we'll have our detailed technical comments coming later today.

Our comments focus primarily on transportation, but my review had a number of less-transpo-related comments that I wanted to also share a bit less formally, as they're rather beyond our purview. They're in the attached spreadsheet.

There's nothing major in there; just lots of small suggested tweaks to phrasing, some text that might be in conflict or mis-used, & some other suggestions on how I think the plan might be able to better achieve the vision.

(in case you notice that the comment numbering is in a weird order ... these are pulled out of my larger yet-to-come spreadsheet & I kept the same numbering that they'd had there)

On a separate note- as one of the Planning Commissioners requested: I'm working on cost estimates for the proposed connection across the RR tracks... I have draft numbers completed & am just vetting them w/ our structural engineers. I *hope* to have something by Thursday's worksession but can't make any guarantees as I'm unsure how fast our structures folk will be able to get back to me.

Thanks!!

Andrew Bossi, P.E. | he/him

From: Henn, Hannah <Hannah.Henn@montgomerycountymd.gov>
Sent: 10 December 2021 15:40
To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>
Cc: Conklin, Christopher <Christopher.Conklin@montgomerycountymd.gov>; Bossi, Andrew <Andrew.Bossi@montgomerycountymd.gov>; Wellington, Meredith <Meredith.Wellington@montgomerycountymd.gov>; Erenrich, Gary <Gary.Erenrich@montgomerycountymd.gov>
Subject: MCDOT Comments on Draft Silver Spring Plan

Hello Casey,

Please see attached for MCDOT's comments on the draft Silver Spring Downtown and Adjacent Communities Plan. The attached document highlights areas for improvement that we feel are most important. Please note that we are sending these comments to you now to facilitate as much time as possible for consideration before the work session next week. We plan to send you a separate file of our detailed comments this coming Monday.

Hannah Henn

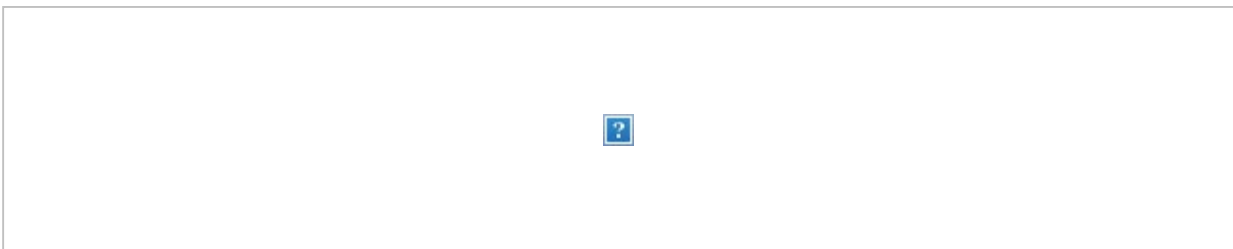
Deputy Director for Policy

Montgomery County Department of Transportation

Office of the Director

101 Monroe Street | 10th Floor | Rockville, MD 20850

(240) 777-8389



For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19

Marc Elrich
County Executive



Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

MEMORANDUM

December 10, 2021

TO: Casey Anderson, Chair
Planning Board

FROM: Hannah Henn, Deputy Director for Transportation Policy
Department of Transportation (MCDOT)

SUBJECT: Silver Spring Downtown and Adjacent Communities Plan
Public Hearing Draft – MCDOT Comments

Thank you for the opportunity to review the Fall 2021 Public Hearing Draft for the Silver Spring Downtown and Adjacent Communities Plan (“the Plan”). We strongly support the vision of the Plan and believe Silver Spring has the potential to become a renowned example of infrastructure centered on pedestrians, bicycling, and transit but are concerned that the Plan’s recommendations do not adequately support the intended vision.

The comments below summarize MCDOT’s most significant concerns related to the ability to achieve the Plan’s vision. Many of these comments have been made previously by our staff as they coordinated with Planning staff throughout the year. Footnotes in this memo are used to reference comments in our detailed technical comments which we plan to transmit to you on Monday, December 13. I will note there are a significant number of detailed comments, and our staff are, as always, available to assist in discussing these comments further as your staff considers modifications to the draft.

- 1) **Transportation Analysis:** We look forward to reviewing the transportation analysis when it becomes available. Our interests will be focused on how the Plan achieves the metrics defined by the Growth & Infrastructure Policy, including how the Plan furthers Vision Zero efforts.

- 2) **Transportation Vision:** During the scoping process MCDOT had suggested that the Plan incorporate a more widespread and systemic approach to shared streets. As a result, we were surprised to find that the Plan did not appear to include any shared streets at all and, in fact, appears to revert Ellsworth Drive into a more conventional street.¹¹⁰ Similarly, most of the new street connections proposed also appear to be proposed as conventional streets, as opposed to shared streets or pedestrian/bicycle connections.¹¹¹ The Plan would also benefit from additional connections, such as a pedestrian/bicycle promenade or shared street parallel to East-West Highway.⁵⁷

There does not appear to be a narrative addressing the existing reversible/dynamic lanes along Colesville Road,¹¹⁸ and conflicting information makes it unclear whether transit lanes are proposed in lieu of these reversible lanes.¹³⁰ A road diet appears to be proposed along most of 16th Street but stops short of including a road diet along the segment south of East-West Highway. MDOT SHA has previously demonstrated interest in reducing this other segment, and the Plan misses that potential opportunity.¹³⁶

- 3) **Thrive:** Several key components proposed as part of the parallel Thrive Montgomery 2050 effort are notably missing from the Plan. There does not appear to be any reference to Complete Communities. Are there important land use types that are not currently available to the Plan area? And how would the Plan propose to achieve these?⁶⁷

Thrive's Action List of Resources includes recommendations to develop an alley network, yet, apart from one proposed alley, the Plan does not appear to include any significant proposal on how to achieve a stronger alley network in Silver Spring, nor account for existing alleys and needs.¹¹²

The Plan also does not appear to include any information on the watersheds' drainage structures and the increasing frequency of Design-Year Storms, which would be a good fit for the "Resilient Downtown" section and align with Thrive's efforts toward climate resiliency.¹⁶²

- 4) **Parking & Freight:** With only one page covering both Parking and Loading, the Plan does not provide enough information on potentially important and transformative components of achieving the vision.

Instead of impediments to the urban vision, Parking Lot District assets should be used as tools that can enable this plan to push more apparent actions toward constraining the parking supply. Possible examples include site design requirements to screen parking or situate it below grade, or parking maximums.¹⁵⁶

The Plan should consider how curbside strategies might affect development design, as well as how development design might affect curbside strategies. It would be helpful to include additional guidance on how to optimally implement Urban Consolidation Centers / micro-distribution centers.¹⁵⁷

- 5) **Rights-of-Way:** MCDOT will need to work with the Planning team to identify which segments need to be considered more closely to ensure that they can accommodate all new infrastructure proposed since the 2000 Silver Spring CBD Plan, including new infrastructure proposed by this plan (such as green infrastructure and café seating), the Bicycle Master Plan, and any other plans can fit within the master planned rights-of-way under the guidance proposed by the Complete Street Design Guide.^{18,19,86,124,142,163} MCDOT's detailed comments include a number of suggestions on how to improve the specific cross-sections provided in the Plan to better reflect Complete Streets.^{109,124,146,148,149,151,152,154}

Additionally, there are several street segments that do not have rights-of-way assigned.^{143,145} A map of rights-of-way (as was included in the 2000 Plan) would be helpful to make this information easier to understand and access in a useful way.¹²⁵

- 6) **Transit:** Considering the opportunities of the Plan area, we believe the transit section should be expanded, ideally including a map focused on transit services serving Silver Spring.¹⁰³ It should include recommendations for increased MARC service as well as recommendations on how the Plan might make the best use of the Purple Line.¹⁰⁴ This section should provide more information on buses, particularly regional and commuter buses.¹⁰⁵ Information currently included about connections to Walter Reed is confusing, does not reflect past discussions MCDOT has had with Planning staff, and would benefit from greater clarity of the purpose and need for what is proposed. Improving Metrobus service may be a more effective means of connecting to Walter Reed than providing new County bus services.¹⁰⁸

- 7) **Infill Metrorail Station:** If an infill Metrorail Station is proposed by Jesup Blair Park, the Plan must make a more overt effort toward seeing this station realized. Right-of-way needs should be identified, and intention to substantially increase densities in the vicinity of the proposed station should be clarified.¹¹⁷ This proposal should also be mentioned in the Transit section instead of the Roadways section.¹¹⁶ Without a much stronger effort to justify this station, it is unlikely that it would ever be realized.
- 8) **Utilities:** There are few substantive references to utilities in the Plan. The Plan should establish a vision for utilities, such as whether they're envisioned to be above or below ground, where in a street cross-section they are envisioned, what conditions might be set upon new developments, and what the current and forecast needs are.⁶⁸
- 9) **Connectivity & Infrastructure Fund; UMP:** There are multiple references to a Connectivity & Infrastructure Fund without any apparent elaboration on what this fund is, who administers it, what specific projects it can be used for, etc. It is unclear whether this concept is complementary to, or if it replaces the Unified Mobility Program (UMP).¹⁷²

MCDOT reiterates our interest that the Plan concurrently establish an UMP for the project area to maximize potential funding resources to support implementation of the Plan. We believe the Plan will have identified all needed infrastructure for the Plan area, and it should be able to enact an UMP with the information already at-hand. Implementing this UMP concurrent with the master plan may avoid some of the implementation challenges previously experienced in White Oak and Bethesda.¹⁷³

- 10) **Conflicting Information:** The Plan includes conflicting information in a number of areas, perhaps most notably regarding transit lanes. While the narrative strongly establishes an interest in transit lanes, the Streets Table does not recommend any new transit lanes at all,¹³⁰ and the one cross-section showing transit lanes only shows a single non-reversible lane in one direction.¹⁰⁹

Similarly, a cross-section of East-West Highway shows a road diet but the Streets Table does not show any such road diets.¹³⁵ Inversely, the Plan appears to paint a vision for narrower streets, yet it appears to propose a widening of Spring Street from 2 to 4 lanes without any narrative supporting this recommendation.^{134,137}

The Bike Map and the Green Loop Map do not match.⁹¹ One street where they do not match is along Eastern Avenue NW. While it is a District-owned roadway, we feel a bikeway connection here has such potential benefits that the Plan might be justified in recommending a bikeway as a matter of advocacy for the District's consideration.^{17,92}

- 11) **Height Limits, FARs:** Please consider increasing or eliminating height and FAR restrictions, or perhaps do so in a limited capacity in areas more central to the downtown core.² We specifically urge that this change be considered for all public properties to speed implementing redevelopments and associated improvements on such sites.³

- 12) **Railway Crossings:** We strongly urge a connection linking Apple Avenue with North/East Falkland Lane.⁶⁴ This and the other new connection proposed across the railroad tracks should allow for construction either above or below the tracks²³ and should include language as to how these connections might be implemented as part of private developments.²⁴ Consider also an extension of the Silver Spring Metrorail's south mezzanine to cross over the railroad tracks to provide direct connectivity with the MARC platforms and improve any connections not included in the Purple Line project.²⁵

- 13) **ADA Accessibility:** The Plan should include more detailed information related to improving access for persons with disabilities.^{83,97,100}

- 14) **Blair Road:** The recommendations to close or restrict Blair Road need refinement. Our detailed comments include suggestions that may better achieve the Plan's apparent goals.¹¹⁵

- 15) **CIP Table:** The Capital Improvement Program table appears to be missing a substantial number of projects. MCDOT review identified most of the missing transportation projects, though there are many non-transportation projects that we did not include in our comments but also appear to be missing from the CIP Table.^{177,178,179,180}

Should you have any questions regarding our comments on the Plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at andrew.bossi@montgomerycountymd.gov.

HH:AB

cc: Chris Conklin, MCDOT
Gary Erenrich, MCDOT
Andrew Bossi, MCDOT
Meredith Wellington, CEX

0	Team	Commenter	Page	Section	Comment
2	Policy	ADB	General	General	<p>Consider the need for height limits at all, particularly on properties nearer to the core, or considering using a more ambitious Building Height Incentive Zone (noted on p140).</p> <p>Height limits may artificially constrain supply of residential units (and other uses) & affect housing costs (though this could also be applied to other uses. This, in turn, affects both the demand and viability of area transit services, commercial viability for businesses dependent on having a high volume of available customers, and a tax base capable of supporting infrastructure and amenities called for by this and other County master plans.</p>
4	Policy	ADB	General	General	<p>Most (all?) of the Districts' Urban Design recommendations include a bullet for setbacks above a certain height. In most (all?) cases, these setbacks appears to be excessively low, set at anything above the ground floor (as with Fenton Village) or anything above the 2nd floor (as with Ellsworth or Ripley).</p> <p>In all cases there appears to be multiple existing buildings that exceed these values. Consider making them apply to all levels above the 3rd floor instead of the 1st or 2nd floors.</p>
5	Policy	ADB	General	General	<p>Only Fenton Village includes narrative explicitly supporting a grocery store. Consider whether other districts should have similar language, noting existing grocery stores in the Ellsworth District, South Silver Spring District, and a proposed grocery store in the Falklands District. (there may very likely be other stores that are slipping my mind)</p>
8	Policy	ADB	General	General	<p>Consider reviewing graphics for colorblind accessibility. Some graphics (such as Map 20's orange / light-red palette) are even a bit tricky with full color vision.</p>
9	Policy	ADB	8	2.1	<p>RE: Last Paragraph - How do the 150 participants and 500 React Map comments compare to other plans? That sounds like it might be a lot, and if it is it might be good to highlight that here</p>
10	Policy	ADB	8-9	2.1	<p>I think your department tried a lot of very innovative means of outreach between this plan, Thrive, Corridor Forward, and other efforts throughout these past 2 years. As your department is looked at as a leader nationally, it may be helpful to assemble a white paper on how you feel all these different approaches worked (both pros and cons).</p> <p>What virtual elements might be retained as we transition back toward in-person events? What approaches worked best at reaching demographics that tend to be underrepresented in these efforts? What approaches worked best insofar as accessibility and addressing the Digital Divide?</p>
12	Policy	ADB	11	2.3	<p>I'm glad to see references to indigenous history. I'm not sure if there are any sites of interest related to this history... are those quarries still identifiable? It might be neat to expand on that slightly to really strengthen how real that history is.</p>

0	Team	Commenter	Page	Section	Comment
					RE: 1st Paragraph - "...appear to have used the river valleys mostly for occupation..."
13	Policy	ADB	11	2.3	I think there's a typo? Should that last word be "occupations" or maybe "occupational work"? It just feels like it's missing something. Just "occupation" sounds like they were occupying the land, as opposed to working the land.
14	Policy	ADB	11-12	2.3	I love this history, but one trivial thing missing (that I think many Silver Spring residents will find important) is how Silver Spring got its name; especially since the eponymous spring is a real place that people can visit (even if it's not really an apparent spring anymore) -- It might be nice to add a reference to Acorn Park somewhere into this section.
34	Policy	ADB	27	Map 6	<p>For the two properties listed below consider increasing the allowable height to 240' instead of 175' (or at least something in between, or removing the height limit altogether per one of my initial comments):</p> <ul style="list-style-type: none"> - The property on the north corner of Georgia/Wayne - The zoning on top of Ellsworth immediately north of Georgia (which I believe might be Montgomery County property?)
36	Policy	ADB	28	3.3.1	RE: Goals, 3rd Bullet - Ensure that this bullet supporting retail/commercial spaces on the ground floor cannot also be used to prohibit retail/commercial spaces on other levels. There are many examples in this District of 2nd-floor (and even 3rd-floor as well as below-grade) retail.

0	Team	Commenter	Page	Section	Comment
					<p>RE: Urban Design, 2nd Bullet - Is more action needed beyond small spaces to encourage small local retailers? What is the cause of small local retailers remaining a staple of the Fenton Village District, but chains being the norm in the Ellsworth District?</p> <p>Some factors to consider:</p> <ul style="list-style-type: none"> - The age of the buildings in Fenton Village & that the buildings likely carry little to no debt service, enabling lower leasing rates. Ellsworth, however, has new buildings & accompanying debt service.
38	Policy	ADB	28	3.3.1	<ul style="list-style-type: none"> - Buildings in Ellsworth tend to not have many above-grade levels that could provide additional revenue generation, which means the retail leases have to generate a larger share of the property's revenues. - Being such a high-customer area allows property owners to put a premium on that retail space, which generally only chains can afford. <p>If Fenton Village redevelops, is more needed to compensate for the costs due to renewed debt service? Do the allowed heights enable properties to not have to rely on their commercial tenants for a larger share of revenue, enabling the commercial spaces to potentially lease at lower rates? If Fenton Village also becomes a high volume area of customers, how will market access by small local retail be preserved or enabled?</p>
39	Policy	ADB	28	3.3.1	<p>RE: Urban Design, 3rd Bullet - Instead of an outright prohibition, consider whether large monolithic structures could be permitted albeit under design guidance to emulate the look of multiple smaller buildings. This could achieve the streetside aesthetic but enable a greater flexibility internally within the building/site (which could better enable the inclusion of large footprint uses such as grocery stores)</p>
51	Policy	ADB	35	Map 8	<p>Given that the Transit Center property has multiple constraints, consider allowing this property to have a higher height or more intense FAR than the current CR-5.0 (200'), noting there are 240' heights in all directions of the site as well as CR-8.0 densities in every direction except directly north.</p>
56	Policy	ADB	39	3.3.3	<p>RE: Urban Design, 2nd Bullet - I understand *some* stepping down to the residential uses on the other side of Eastern Ave, but at the same time DC also needs to step up (in multiple senses of the phrase). This neighborhood is extremely near to a major downtown & transit hub and extremely underutilized.</p>

0	Team	Commenter	Page	Section	Comment
61	Policy	ADB	48	3.3.4	RE: Goals, 1st Bullet - Consider whether the historic designation may potentially erode the likelihood of these units remaining affordable. Unless there are other obligations that would keep these affordable: if they are rehabbed over time or if units are consolidated internally they may become a lower-density use that, by nature of its limited supply and lower-density site configuration, could potentially result in higher housing costs than may be envisioned by the plan.
62	Policy	ADB	48	3.3.4	RE: Goals, 2nd Bullet - This appears to establish a "net zero gain" of affordable housing for this site. Confirm that is the intent, as opposed to a project that replaces the existing *and* provides additional affordable housing in accordance with other affordable housing requirements. (see similar comment on p143)
63	Policy	ADB	48	3.3.4	RE: Goals, 3rd Bullet - May need more definition as to how much green cover meets the "significant" requirement. If the site maintains its existing building footprints this may substantially conflict with the plan's vision of achieving more varied affordable housing.
65	Policy	ADB	50	3.3.5	RE: Urban Design, 2nd Bullet - What exactly does it mean to be compatible with surrounding development? This could have a very wide interpretation & be very easily applied conservatively to, essentially, preserve the status quo of single family homes. Is that what is envisioned either by this plan or by Thrive?
69	Policy	ADB	53	4.1.1	RE: Goals, 4th Bullet - Is "No Net Loss" an adequate goal for affordable housing? That is: are existing levels of affordable housing adequate for 46,300 people? Or should the plan seek some defined target of affordable housing?
70	Policy	ADB	53	4.1.1	RE: Goals, 5th Bullet - Are these uses feasible in CR (and similar) zones? If not, is there some way to enable & encourage these light industrial uses while also allowing additional growth above/below them? It'd seem to run counter to the plan's vision if we have, for example, standalone one-story auto repair shops, as opposed to high-density residential buildings that have an auto repair shop included within it, designed with a focus on addressing noise & vibrations.
71	Policy	ADB	59	4.2	Particularly as land values increase, does this plan propose any mechanisms to either limit the impacts of rising rents or property taxes on those at risk of being unable to afford such increases? (this may be applicable to both residential as well as commercial / retail / industrial tenants)
72	Policy	ADB	59	4.2	It's great to see 43% of units are already affordable at 80% AMI. Are there any units at lower AMIs? It might be good to also highlight that (even if there aren't any).
73	Policy	ADB	59-60	4.2	The 5th paragraph on p59 alludes to unit types but there doesn't appear to be any further information on these unit types, particularly the number of bedrooms. What does the supply of different amounts of bedrooms look like, and what is that supply at different %AMI levels of affordability? Should we set goals for increasing the number of multibedroom units?

0	Team	Commenter	Page	Section	Comment
74	Policy	ADB	61	4.2.1	RE: Goals, 4th Bullet - This goal to increase the number of affordable housing seems to conflicts with the goal at the start of 4.1.1 (p53) only seeking "No Net Loss" of affordable housing. (see earlier comment on p53) The goal here on p61 seems like a better goal.
75	Policy	ADB	62	4.2.2	The plan should provide stronger information on permanent supportive housing efforts, particularly if they might be something that can be implemented as a part of private development.
76	Policy	ADB	62	4.2.2	Consider rephrasing "for the homeless" as "persons experiencing homelessness". This reflects industry practices of identifying homelessness not as a descriptor of a person, but as a condition someone is experiencing.
78	Policy	ADB	65	4.4.1	As Design Guidelines are developed (per 1st Bullet), give consideration toward & clarify the rights of properties with solar panels (per 4th bullet). Would property owners with solar panels have any authority over neighboring properties that may block those panels? Or will neighboring properties be permitted to build by-right even if it may block existing solar panels?
164	CSS	JJC	111-112	4.7.2	Definitely like the idea of community gardens, something that should be enthusiastically promoted.
165	Policy	ADB	120	4.8	Consider a section focused on equity needs & the needs of low-income or historically disadvantage populations. This might include providing free financial consulting, banking for unbanked populations, etc
166	Policy	ADB	120	4.8	In addition to facilities for seniors, consider adding bullets for facilities for children (playgrounds, childcare, etc) as well as teens (skateparks, places to hang out). See the following link: https://www.theguardian.com/cities/gallery/2019/aug/01/lizarding-and-flex-allure-how-do-you-use-your-city-plaza-in-pictures-field-guide
167	Policy	ADB	120	4.8.1	RE: 1st Paragraph of this Sub-Section - Consider also referencing non-police organizations, such as the Mobile Crisis Team.
169	Policy	ADB	129-138	4.9.4	Ensure that the properties included in proposed historic designations account only for those structures or areas considered truly necessary for preservation. Unless there are exceptions or other caveats, such preservation must proceed with the awareness that these will eliminate the future development potential of these sites, limiting the number of housing units, affordable units, commercial space, and public infrastructure that such properties may have otherwise provided.
170	Policy	ADB	131	Map 28	If the designation of the Silver Theatre and Shopping Center is new under this plan, this designation should carefully consider how this may affect efforts to improve ped/bike connectivity between the Georgia/Colesville intersection and the Fenton/Ellsworth core. (see also comment on p25)

0	Team	Commenter	Page	Section	Comment
176	Policy	ADB	143	5.1.6	<p>Does the MPDU percentage apply on net units or additional units?</p> <p>For example, if there was a redevelopment of a site with existing 50 MPDUs, and the site provided 1000 new DUs in total, would the site have to provide:</p> <ul style="list-style-type: none"> - 150 MPDUs (1000 * 15%), or... - 193 MPDUS (50 existing + 950*15%) <p>(see a similar comment on p48)</p>
184	Policy	ADB	148-149	5.5.1	<p>Consider adding a bullet suggesting free or discounted financial management & consulting services aimed at both limited-income individuals as well as small businesses.</p>