Montgomery Planning

GREAT SENECA PLAN: CONNECTING LIFE AND SCIENCE

The Great Seneca Plan

CONNECTING LIFE AND SCIENCE

Description

This worksession will focus on the recommendations in the Public Hearing Draft for the Life Sciences Center, specifically the built environment (except for transportation), social environment, and natural environment recommendations. The transportation recommendations in the Public Hearing Draft will be the focus of a future worksession.

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SUMMARY

- The Great Seneca Plan: Connecting Life and Science is a comprehensive amendment to the 2010 *Great Seneca Science Corridor Master Plan* and covers 4,330 acres in the heart of the I-270 Corridor between the cities of Gaithersburg and Rockville and the Town of Washington Grove.

- The Plan includes several distinct areas with a variety of contexts, conditions, and opportunities, including the Life Sciences Center (LSC), Quince Orchard, National Institute of Standards and Technology (NIST), Londonderry / Hoyle's Addition, Rosemont, Oakmont, Walnut Hill, Washingtonian Light Industrial Park, Washingtonian Residential, and Hi Wood.

- The Planning Board received public testimony on the Great Seneca Plan Public Hearing Draft on March 14, 2024. The public hearing record remains open until March 21, 2024 for additional written testimony to be submitted to the Planning Board. A summary of all comments received to date are included as Attachment 1 and any additional testimony received will be summarized and provided in advance of the next worksession.

- The first worksession will focus on the recommendations for the Life Sciences Center in the Public Hearing Draft and testimony received for the built environment (except transportation recommendations), social environment, and natural environment.

- Staff will return to the Planning Board on April 7, 2024 and anticipates discussing the transportation recommendations in the Life Sciences Center as well as testimony received.

MASTER PLAN INFORMATION

Draft
Great Seneca Plan Public Hearing Draft

Date
March 15, 2024

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Planning Board Information
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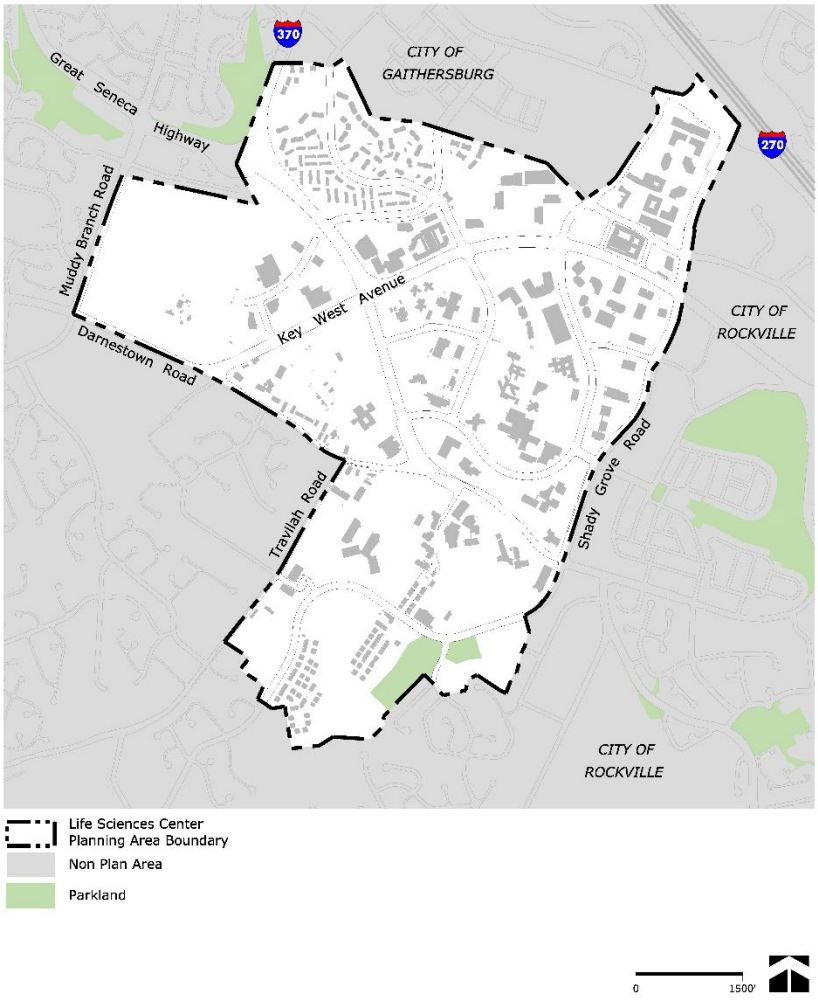
Life Sciences Center



GREAT SENECA PLAN: CONNECTING LIFE AND SCIENCE

PUBLIC HEARING DRAFT WORKSESSION #1

The Great Seneca Plan covers 4,330 acres in the heart of the 1-270 Corridor between the cities of Gaithersburg and Rockville and the Town of Washington Grove. This Plan focuses on strengthening the economic competitiveness of the Life Sciences Center through mixed-use development, public realm improvements, equitable access, and implementation strategies. In addition, it aims to provide additional housing, local serving amenities and services in the Londonderry and Hoyle's Addition area, and offers limited recommendations for the Quince Orchard, Rosemont, Oakmont, Walnut Hill, Washingtonian Light Industrial, Washingtonian Residential, and Hi Wood areas. Recommendations are organized within the themes of the built, social, natural, and economic environments and provide guidance for land use; zoning; urban design; transportation; parks, trails, and public open space; the economy; and the environment.

The Great Seneca Plan: Connecting Life and Science contains the text and supporting maps for a comprehensive amendment to the approved and adopted 2010 *Great Seneca Science Corridor Master Plan*, as amended. It also amends *Thrive Montgomery 2050*, as amended; the 2018 *Master Plan of Highways and Transitways*, as amended; the 2018 *Bicycle Master Plan*, as amended; the 2022 *Corridor Forward: The I-270 Transit Plan*; and the 2023 *Pedestrian Master Plan*.

The Planning Board Public Hearing for the Great Seneca Plan was held on March 14, 2024, in the Montgomery County Planning Board auditorium at 2425 Reedie Drive in Wheaton. The public record will remain open until March 21, 2024.

The first worksession will focus on the Public Hearing Draft recommendations for the Life Sciences Center. Staff will review recommendations for the built environment, social environment, and natural environment as well as testimony received in these areas.

Subsequent worksessions will focus on the Public Hearing Draft's recommendations for additional elements in the Life Sciences Center, including transportation, the economic environment, implementation, and the Life Sciences Center Overlay Zone, as well as recommendations for other areas of the Plan, including the Londonderry and Hoyle's Addition area.

Additional worksessions are tentatively scheduled on April 4, April 11, April 18, and April 25.

Attachment A: Summary of Testimony Received and Staff Responses

Attachment B: Testimony Received

ATTACHMENT A

	Issues	Area/ Property	Public Hearing Draft Plan Page #	Testimony or Comments	Commenters	Staff Response	Planning Board Decision
1	Housing	Life Sciences Center	n/a	New housing will result in a rental concentration, which is appropriate because of the strong rental market and significant employment and transportation opportunities in the Life Sciences Center.	Department of Housing and Community Affairs	Comment received.	
2	Housing	Life Sciences Center	37	Require new developments to provide at least 12.5% MPDUs. The requirement to provide 12.5% MPDUs should be modified to require 15% MPDUs because the 15% MPDU requirement is mandated in 25A of the Code to be based on census tract income, the current allocation of those areas would split the Life Sciences Center area in half.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
3	Housing	Life Sciences Center	37	May not need recommendation about non-profit and religious institutions in this section because there are no religious institutions	Department of Housing and Community Affairs	Comment received.	
4	Housing	Life Sciences Center	37	Recommend that preserving naturally occurring affordable housing where possible be given more priority than a goal to achieve. If considering CR point allocations or priorities, preservation of affordable housing should be the primary compliance requirement of the master plan.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
5	Housing	Life Sciences Center	37	Support recommendation to require 30% MPDUs where public properties are redeveloped with residential uses with 15% affordable at MPDU standards and 15% at 50% of AMI. Though there are a few public properties within this area's boundaries, redevelopment of those sites is unlikely.	Department of Housing and Community Affairs	Noted. Staff met with State and County staff who identified possible sites for future redevelopment.	
6	Housing	Life Sciences Center	37	Prioritize rental agreements. While individual developers should work with DHCA to consider the possibility of rental agreements for support, rental agreements are subject to County funding and are not guaranteed.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
7	Housing	Life Sciences Center	38	Prioritize family sized units. This recommendation should be one of many that should be provided across the Plan areas, regardless of location. Encouraging more family sized units in this area, close to employment and transportation, should be prioritized everywhere that multifamily is allowed.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
8	Housing	NIST / Londonderry and Hoyle's Addition	81	The housing recommendations should include requirements, in the event of redevelopment, that additional equity features like that a sound wall and assistance in park creation are provided.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
9	Housing	NIST / Londonderry and Hoyle's Addition	81	Recommendations for the Londonderry housing section focus on preservation but could be modified to clarify that retention of affordability should be the ultimate priority. There is more than double density potential with the new zoning recommendation. Redevelopment is a viable option for the future of this section.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	
10	Housing	Quince Orchard	91	There is capacity to build an additional 200 units on the McGowan property and the St. Rose de Lima church property in an area with limited housing, there is the possibility of significant housing impact here. This is where a Plan-wide recommendations on housing might be beneficial if these properties were to redevelop.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.	

11	Housing	Oakmont and Walnut Hill	103	Unity Christ Church at 111 Central Avenue, however, has redevelopment potential. It is located on a neighborhood connector road, Central Avenue, and is 158,141 sf in R-200 zone with a recommended CR neighborhood floating zone. Density under the R-200 zone is limited to 2.18 units /acre, so the maximum units the property could generate is 7 single family houses; however, if the CRN 0.5, C-0.5, R-0.25, H-150' floating is applied, the property could generate 31 units. In light of new legislation and County policies to encourage housing redevelopment on property owned by places of worship, this site could be redeveloped in the future.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
12	Housing	Washingtonian Light Industrial Park	110	This warehousing and distribution area of the County has its own value to the County's economy; however, if there is the potential for housing development, Plan-wide recommendations might be beneficial.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
13	Housing	Great Seneca Plan Area	N/A	Create a Plan-wide housing recommendation section be provided to cover all potential redevelopment areas.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
14	Housing	Great Seneca Plan Area	N/A	Though the Life Sciences area is the only section of the Plan with identified public properties, a recommendation for public acquisition of property could apply across all areas should additional property come under public ownership.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
15	Housing	Great Seneca Plan Area	N/A	A general recommendation could be provided to consolidate a couple of recommendations that are currently specific to certain areas: Encourage public, private, nonprofit, philanthropic, and religious institution partners to expand housing affordability in infill and redevelopment. Work with public, private, nonprofit, philanthropic, and religious	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
16	Housing	Great Seneca Plan Area	N/A	Priority should be given throughout the whole Plan to require the prioritization of existing naturally occurring affordable housing, striving for no net loss in the event of redevelopment. In the event of redevelopment, the priority should be given to existing eligible residents for the units that are under market-affordable rental agreements	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
17	Housing	Great Seneca Plan Area	N/A	Prioritize two- and three-bedroom units for residential development projects to provide additional family-sized units. This recommendation should be one of many that should be provided across the Plan areas, regardless of location. Encouraging more family-sized units in this area, close to employment and transportation areas, should	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
18	Housing	Great Seneca Plan Area	N/A	Additionally, if the MPDU requirements are modified in the future, language should be provided to allow for whatever requirement is under theCode at the time of development. DHCA recommends modifying the recommendation to apply throughout the Plan as follows: Change recommendations to match county code and add to all areas of the plan area. Require new developments to provide at least 12.5% MPDUs, or other MPDU obligation as established by Code, aligned with current county policy, except in the Life Sciences Area which should provide at least 15% MPDUs throughout that section.	Department of Housing and Community Affairs	Comment received. Staff will discuss with the Planning Board during worksessions.
19	Housing/Overlay	Life Sciences Center	3, 33	Clarify ".....incentivizes production of affordable and market rate housing" in contrast with "Require newdevelopments to provide at least 12.5% Moderately Priced Dwelling Units (MPDUs), aligned with current county policy, unless applying the density bonus provisions of the Life Sciences Center Overlay Zone."	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
20	Map	Life Sciences Center	29	All R&D and residential uses not accurately shown in figure 8	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
21		Life Sciences Center		Clarify / define the intent of ".....facilitate continued growth .....through compact, mixed use development." as mixed use pertains to the LSC	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.

22	Vision	Life Sciences Center	28	Support vision for the life sciences center as a complete community with mixed life science and housing used with transportation options and public amenities.	Heather Dlhopsky on behalf of B9 Sequoia Grove, Francoise Cartier on behalf of Guardian Realty Management, Phillip Hummel on	Comment received.
23	Open space	Grove	30, Figure 11	The Conceptual diagram shows public open space in the middle of the sites owned by B9 Sequoia. The diagram does not have a scale, but appears to be 6% of the properties. The size and location identified for parks and public open space, as shown on Figure 11, "Conceptual Diagram of the Life Sciences Center as a Complete Community", is problematic for several reasons. First	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner)	The conceptual diagram is meant to be illustrative and not show exact measurements or alignments.
24	Open space	Grove	65	The Owner understands that Staff envisioned that the total public open space requirements for the Owner's properties would be concentrated in the one noted space rather than dispersed through each of their five sites, that assumes that all of the Owner's properties redevelop at the same time. At this time it is unrealistic to make this assumption	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
25	Street grid	Grove	65	Corporate Blvd is proposed to be extended through the Owner's properties. The property owner would have to improve both sides of the road and dedicate approximately 75,000 sq ft of their land.	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
26	Street grid	Grove	65	It is improbable that Corporate Boulevard would make it all the way west to connect with Omega Drive.	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner), Francoise Cartier	Comment received. Staff will discuss with the Planning Board during worksessions.
27	Frontage Improvements	Grove	65	The owner's property fronts on Omega Drive, Research Boulevard, and Shady Grove Road, should they redevelop each of those frontages would need to be improved to the standards identified in the Draft Plan. This is a disproportionate burden.	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
28	Density	Grove	65	Owner wants to develop townhomes. A minimum density should not be implemented as part of the overlay zone.	Heather Dlhopsky on behalf of B9 Sequoia Grove (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
29	Street grid	Guardian (15200 Shady Grove Road)	65	Retain grassy strip abutting property which was dedicated as a roadway as a public open space with a bicycle and pedestrian path.	Francoise Cartier on behalf of Guardian Realty Management (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
30	Street grid	Guardian (15200 Shady Grove Road)	65	If the Planning Board decides to leave these two road recommendations in the Plan – the one through the grassy area and the one through existing buildings at The Grove –Guardian requests a note in the Plan specifying that construction of the road through the grassy area should not be required in connection with adjacent or nearby development unless	Francoise Cartier on behalf of Guardian Realty Management (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
31	Frontage Improvements	Guardian (15200 Shady Grove Road)	65	Frontage requirements on two roadways is an undue burden for a small property. leave room for flexibility during the development review process about what requirements will be placed on the project. Guardian requests a modification to clarify that installation of frontage improvements on both road frontages and a contribution to the Key West promenade are	Francoise Cartier on behalf of Guardian Realty Management (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
32	Key West Promenade	Guardian (15200 Shady Grove Road)	65	The Plan recommends formal abandonment of the County's right-of-way of two lanes of Key West. The Plan should specify that the Planning Board or another county entity (perhaps the Department of Transportation) will request abandonment of the two lanes along the operative portion of Key West Avenue. This will avoid holding up development of individual properties	Francoise Cartier on behalf of Guardian Realty Management (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
33	Overlay Zone	Guardian (15200 Shady Grove Road)	65	Guardian requests that the overlay zone specifically permit the "Animal Research Facility" use, which currently is permitted only in the LSC zone. It is a use that many businesses engaged in research and development may need to incorporate in their operations at a small scale.	Francoise Cartier on behalf of Guardian Realty Management (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
34	Overlay Zone	Bewlard Campus	38	Support recommendation to make it easier to infill residential development with healthcare and/or life science uses	Phillip Hummel on behalf of Johns Hopkins University (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
35	Red Policy Area	Bewlard Campus	39	Belward Campus should be included in the creation/expansion of the red transportation policy area recommended in the Public Hearing Draft.	Phillip Hummel on behalf of Johns Hopkins University (property owner), Eric Fischer on behalf of Trammel Crowe Company (lessee	Comment received. Staff will discuss with the Planning Board during worksessions.
36	Belward	Bewlard Campus	63	Add new language to Opportunity Site description of Belward to add "preliminary plan" so the text will read "This Plan retains many of the recommendations from the 2010 Plan and supports implementation of the approved preliminary plan and site plans."	Phillip Hummel on behalf of Johns Hopkins University (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.

37	Belward recommendations	Bewlard Campus	63	Should not require adaptive reuse, instead "consider" adaptive reuse of historic farmhouses on the Belward site.	Phillip Hummel on behalf of Johns Hopkins University (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
38	Open space	Bewlard Campus	66-68	Public Hearing draft correctly acknowledges Belward contribution to public open space.	Phillip Hummel on behalf of Johns Hopkins University (property owner)	Comment received. Staff will discuss with the Planning Board during worksessions.
39	Natural Environment	Life Sciences Center	71-72	Requirements for green cover and tree canopy should not apply to large sites that have already been comprehensively planned.	Phillip Hummel on behalf of Johns Hopkins University, Eric Fischer on behalf of Trammel Crowe Company	Comment received. Staff will discuss with the Planning Board during worksessions.
40	Natural Environment	Life Sciences Center	71-72	Existing forest cover on a site should be included in any green cover calculation and solar canopies in parking lots should count towards the calculation for tree canopy coverage.	Phillip Hummel on behalf of Johns Hopkins University, Eric Fischer on behalf of Trammel Crowe Company	Comment received. Staff will discuss with the Planning Board during worksessions.
41	Implementation	Life Sciences Center	74	Support recommendation to remove staging requirements.	Phillip Hummel on behalf of Johns Hopkins University, Eric Fischer on behalf of Trammel Crowe Company, Bill DePippo on behalf of	Comment received.
42	Belward	Belward		Supports Plan and Belward Campus recommendations.	Chair Robert K. Sutton on behalf of the Historic Preservation Commission	Comment received.
43	Overlay Zone	Life Sciences Center		Modifying applicable zoning regulations to broaden the range of land uses that are permitted in the Life Sciences Center.	Phillip Hummel on behalf of Johns Hopkins University, Eric Fischer on behalf of Trammel Crowe Company, Francoise Cartier on	Comment received.
44	Overlay Zone	Life Sciences Center		With respect to broadening the range of land uses that may be permitted on Life Sciences Center properties, we believe that supporting increased flexibility to allow for uses that are ancillary to the biotechnology market – such as office, warehousing, or interim surface parking uses, for example, in addition to residential – would be a beneficial change.	Eric Fischer on behalf of Trammel Crowe Company	Comment received. Staff will discuss with the Planning Board during worksessions.
45	Regulatory Review	Life Sciences Center		Master Plan also should support the development and implementation of swifter administrative processes to facilitate land use entitlements in the Life Sciences Center.	Eric Fischer on behalf of Trammel Crowe Company	Comment received.
46	Street grid	Belward	40	Add language in bold "Provide dedicated transit lanes for the Corridor Connectors identified in Corridor Forward: the I-270 Transit Plan, as shown in Figure 20. For the Great Seneca Connector, this Plan recommends proceeding with the alignment that includes dedicated bus lanes on Medical Center Drive through the former Public Safety Training Academy (The Elms at PSTA) and **within the approved cross-sections for the** Belward properties **(either within the 50' median or on the road)** to Muddy Branch Road."	Eric Fischer on behalf of Trammel Crowe Company	Comment received. Staff will discuss with the Planning Board during worksessions.
47	Street grid	Belward	63	Add language in bold "Belward Campus has a long-standing preliminary plan as well as two approved site plans . . .This Plan recommends supporting the Corridor Connector alignment that includes dedicated bus lanes through the property **within its approved cross-sections (either within the 50' median or on the road)** to Muddy Branch Road…."	Eric Fischer on behalf of Trammel Crowe Company	Comment received. Staff will discuss with the Planning Board during worksessions.
48	Street grid	Adventist		The Great Seneca Plan recommends two east-west vehicular connections through the campus: one through the Opportunity Site and the other directly through the anticipated expanded hospital facility. Only the Opportunity Site connection is feasible.	Dan Cochran, President Shady Grove Medical Center	Comment received. Staff will discuss with the Planning Board during worksessions.
49	Overlay Zone	Life Sciences Center		Plan seeks to encourage the implementation of new housing and mix of uses in the Life Sciences Center. While we understand this aspirational goal, the Plan needs to be very clear about the desired location(s) for housing opportunities for the benefit of life science investors, who would want this certainty.	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.

50	Street grid	Life Sciences Center	39	Recommendations for new streets and alleys, require immense operational coordination and multi-agency approvals that add time/coordination required will add time to the regulatory approval processes and create unpredictability in the fast past world of life science development. ARE advocates, as a clear alternative, for strong pedestrian connections between campus clusters to facilitate biotech growth.	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
51	Housing	Life Sciences Center	N/A	Are the residential communities that surround LSC on all sides considered to support the 15 minute living?	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
52	Overlay Zone	Life Sciences Center	N/A	Does overlay zone mandate housing on new or redeveloped properties?	Bill DePippo on behalf of Alexandria Real Estate Equities	Overlay zone will not set minimums for residential uses.
53	Overlay Zone	Life Sciences Center	N/A	Is the County proposing housing on properties that are primarily life sciences?	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
54	Housing	Life Sciences Center	68	Lhe LSC is surrounded by residential districts. Lack of housing options is not a barrier to attracting and retaining employees in the Life Sciences Center. Please provide data to support the need for more housing in the LSC so we can properly advise and/or comment.	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
55	Publicly owned properties	Life Sciences Center	69	Direct funding to relocate the State and County owned properties should be a high priority.	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
56	Economic Environment	Life Sciences Center	23	"This style of development not only contributes to an inactive public realm, it threatens the economic competitiveness of the county." Clarify. Page 23 indicated that this was the "premier location for the life science and biohealth industries." How might it threaten	Bill DePippo on behalf of Alexandria Real Estate Equities	Comment received. Staff will discuss with the Planning Board during worksessions.
57	Economic Environment	Life Sciences Center	N/A	The life sciences industry is one of the most valuable assets of the State of Maryland. This industry is a critical thing for the state and the county focus on. Appreciate involvement in the Life Sciences Study, and echo findings of the study. We need to think now about how we want the built environment to transform in the coming decades to be a community that can be better integrated, to activate and connect industry with the community. Need to create a life sciences community where our built community enables social interaction - walking next door to meet, having unplanned encounters.	Brad Stewart on behalf of Montgomery County Economic Development Corporation	Comment received.
58	Economic Environment	Life Sciences Center	N/A	Support plan recommendations that better integrate the life sciences into the neighborhoods.	Brad Stewart on behalf of Montgomery County Economic Development Corporation	Comment received.
59	Economic Environment	Life Sciences Center	N/A	Plan supports building a community that enables casual and serendipitous interactions	Brad Stewart on behalf of Montgomery County Economic Development Corporation	Comment received.
60	Economic Environment	Life Sciences Center	N/A	Plan supports the economic and physical health of the area.	Anne Khademian, President, Universities of Shady Grove	Comment received.
61	Street grid, density	Promark	66	Noted two concerns: the east west street connections proposed in the Public Hearing Draft. Two new street connections are unnecessary. The goal to improve connectivity must be realistic. Southern most proposed road conflicts with the medical center's expansion, which is connected to ProMark's property. Suggest a single 60-foot right of way, rather than two connections. In addition, also request higher densities to support development on the site. Request revised zoning to a 2.0 FAR. Request that the limitations on residential be removed or relaxed.	Bob Eisinger, ProMark Partners	Comment received. Staff will discuss with the Planning Board during worksessions.

62	#8 reads: >>> Build out a network of alleys in the downtown and town center area types to support	Public Hearing Draft	General	Many of the graphics are very small & use low-resolution imagery, making it difficult to zoom in and view details. Graphics need to be enlarged & use higher-resolution imagery.	Montgomery County Department of Transportation	Comment received.
63	Colorblind Accessibility	Public Hearing Draft	General	Consider reviewing graphics for colorblind accessibility. Some graphics (such as Figures 41 and 42; the only two I tested) appear to post some colorblind accessibility challenges.	Montgomery County Department of Transportation	Comment received. Staff will review and format the document ___
64	Complete Communities Metrics	Public Hearing Draft	4, 23, 31, 73	A "Complete Community" still have no measurable metrics to determine what they are, how to pursue them, & whether they are being achieved. We understand that these metrics are still in development. I have previously suggested the following metrics: (1) What target land uses are expected to be reachable, (2) within what defined timeframes (3) of traveling by what mode? For example: a plan might 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.	Montgomery County Department of Transportation	Comment received. Thank you for your ongoing efforts and collaboration to develop metrics as part of the Growth and Infrastructure Policy Update.
65	Formatting	Public Hearing Draft	6	Crop the bottom of the graph & scale it to be larger.	Montgomery County Department of Transportation	Comment received. Staff will review and format the document ___
66	Formatting	Public Hearing Draft	7	Consider splitting Figures 2 and 3 into onto two separate pages, side-by-side on a two page spread. This will allow them to be larger. Alternately, if kept on the same page: move the legend above or beneath them to afford both maps to be larger.	Montgomery County Department of Transportation	Comment received. Staff will review and format the document ___
67	Guiding Plans & Policies	Public Hearing Draft	14	Consider including the 2018 Bicycle Master Plan and the 2023 Pedestrian Master Plan.	Montgomery County Department of Transportation	Comment received.
68	Formatting	Public Hearing Draft	16-18	Consider aligning the maps across each of these three pages (Figures 4, 5, 6), as well as moving the legend further right & enlarging each map.	Montgomery County Department of Transportation	Comment received.
69	Formatting	Public Hearing Draft	20-21	Consider aligning the maps across each of these two pages (Figures 7,8), as well as moving the legend further right & enlarging each map.	Montgomery County Department of Transportation	Comment received.
70	Formatting	Public Hearing Draft	27	The footnote area appears to have a lot of extra whitespace. Removing this whitespace should allow the text to fit in one column & the graphic to be larger. Move Figure 10's legend beneath it to give more space for the graphic to enlarge.	Montgomery County Department of Transportation	Comment received.
71	Formatting	Public Hearing Draft	33-35	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 12, 13, 14, 15).	Montgomery County Department of Transportation	Comment received.
72	Densities	Public Hearing Draft	35	The densities within the Downtown area (per p43, Figure 18) feels unambitious for what is expected of a Downtown / Red area, which is preferred to have FARs more in the vicinity of 2.0 or 3.0 rather than the 1.0 and 1.5 assigned to most of the area. Higher densities would also extract greater benefit from investments in dedicated transitways & accompanying bus services. Consider whether the Downtown / Red area should have larger FARs. If Planning or Council agree with evaluating greater densities: the Plan must ensure that transportation infrastructure (particularly transit access) remains capable of supporting these additional densities, or if additional infrastructure would be needed.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
73	Zoning for Public Properties	Public Hearing Draft	35	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.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.

74	Divided Property	Public Hearing Draft	35	The area labelled with (5) and bounded by Shady Grove Rd, Research Blvd, Omega Dr, and I-270 is split between a Downtown and Town Center area (per p43, Figure 18), and subsequently also between a Red and Orange policy area (per p39, #6). Consider whether the zoning should be split into two different types, or if the site should be entirely a Downtown/Red or entirely a Town Center/Orange area.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
75	Formatting	Public Hearing Draft	36	The table runs over the footer information. Consider doing the following: - Shrink the width of the Map Number column; - Increase the width of the two Zoning columns; - Shift the table slightly upward	Montgomery County Department of Transportation	Comment received. Staff will review and format the document ___
76	Formatting	Public Hearing Draft	37	The footnote area appears to have a lot of extra whitespace. Removing this whitespace should allow the text to fit on one page.	Montgomery County Department of Transportation	Comment received. Staff will review and format the document ___
77	Parking Lot District	Public Hearing Draft	38-40	A recommendation should be included regarding the existing Parking Lot District for the area. Options include: - Retain the PLD as-is, generally focused on existing parking meters within the PLD. - Expand the PLD or its mission for the area. This might utilize existing public properties or private properties to construct new garage facilities. These facilities could help other developments proceed with less parking of their own. These facilities might also be situated as to convert motorists along Boulevards into pedestrians/bicyclists within the area, reducing traffic load on the internal Streets.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
78	Impossible Infill Road Connections	Public Hearing Draft	39	The sub-bullet for #1 reads as follows: >> Where development occurs within master-planned blocks that are more than twice as large as the sizes recommended in the Complete Streets Design Guide, proposed developments must provide additional non-master planned street connections to reduce block size. If providing a complete street connection is not possible, developments must dedicate right-of-way to advance the eventual construction of the non-master planned street connection. <<< It is not clear what circumstances would render such a connection impossible to build. The second sentence may either need removal, elaboration, or may need to give a different path forward. Elaboration might clarify what is considered not possible to build, and what is expected of an applicant to assert that the facility is not possible to build. One potential case might be a facility requires ROW beyond an applicant's control, which would be a reasonable limitation where ROW dedication would be helpful. However, if it is considered "not possible" due to technical limitations such as grade, terrain, environmental features, etc: the applicant should demonstrate why it is impossible* to navigate these difficulties. And it is not clear how dedicating ROW for future construction would change those circumstances. In such situations we might perhaps enter negotiations with the applicant to identify alternative options that meet the spirit of the master plan. This might, for example, replace a street connection with a ped/bike connection along the same path.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
79	Channelized Rights	Public Hearing Draft	39	#2, 3rd Sub-Bullet: Change >>> Remove channelized right-turn lanes from all intersections. <<< to >>> Remove channelized right-turn lanes from all intersections where roadway geometry allows. <<<	Montgomery County Department of Transportation	Comment received.
80	Alleys	Public Hearing Draft	39	#8 reads: >>> Build out a network of alleys in the downtown and town center area types to support loading and site access. <<< consider phrasing >>> Build out a network of alleys in the downtown and town center area types to support loading and primary site access. <<<	Montgomery County Department of Transportation	Comment received.
81	Crosswalks Graphic	Public Hearing Draft	40	Consider including the graphic from the Pedestrian Master Plan that shows different types of crosswalks and their names.	Montgomery County Department of Transportation	Comment received.
82	Crosswalk Type	Public Hearing Draft	40	#9, 1st Sub-Bullet: >>> Upgrade all intersections with high-visibility continental crosswalk markings for all pedestrian approaches. <<< to >>> Upgrade all intersections with high-visibility continental or ladder crosswalk markings for all pedestrian approaches. <<<	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
83	Formatting	Public Hearing Draft	40	#10, 2nd Sub-Bullet: Change "side paths" to "sidepaths" to reflect the formal naming in the County Code.	Montgomery County Department of Transportation	Comment received.

84	Bike Parking Stations	Public Hearing Draft	40	#10, 4th Sub-Bullet: Confirm that Bicycle Parking Stations are intended for "transit stations; trails, parks, and public open spaces; and large employment or retail centers." The FIS will reflect these are structured parking for bicycles. If something less intensive is intended by this recommendation then the phrasing should be altered. Perhaps to "covered bike parking" or something along those lines.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
85	Interparcel Ped Connectivity	Public Hearing Draft	41	#16 - Consider an additional sub-bullet reading something along the lines of: #16 - Consider an additional sub-bullet reading something along the lines of: "Promote interparcel pedestrian and bicycle connectivity through accessible sidewalk and sidepath connections between sites."+89:89	Montgomery County Department of Transportation	Comment received.
86	Curbless & Shared Streets	Public Hearing Draft	41	#16, 3rd Sub-Bullet: Change "shared streets" to "Curbless and Shared Streets" to reflect the parlance of this ongoing Planning-MCDOT effort.	Montgomery County Department of Transportation	Comment received.
87	Formatting	Public Hearing Draft	41-44	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 16, 17, 18, 19, 20).	Montgomery County Department of Transportation	Comment received.
88	Curbless & Shared Streets	Public Hearing Draft	41-44, 83-84	Figures 16, 17, 18, and 19: Consider changing "Shared Street" (Fig.16,19) and "Commercial Shared Street" (Fig.17,18) both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Commercial Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. Portions of these streets may be more likely to be Curbless Streets rather than Shared, depending on the amount of vehicle loading expected to use these streets. Vehicle loading may be due to garage access associated with adjacent developments (particularly where they may be unable to fit access points onto other fronting streets), and the more vehicles: the less comfort & efficacy a Shared Street will have.	Montgomery County Department of Transportation	Comment received.
89	Sharp Turns	Public Hearing Draft	42-44	The maps show several sharp turns in roads, such as along Research Blvd Extended. These may be OK as shown, but must be done so with the awareness that implementation may not necessarily reflect such sharp turns. Sharp turns may be acceptable if they occur at distinct intersections (such as with other streets not shown on these maps, or with driveways). The plan might include narrative to this effect, or simply an acknowledgment during Planning Board / Council worksessions that this is acknowledged.	Montgomery County Department of Transportation	Comment received.
90	USG Area Type	Public Hearing Draft	43	The USG site has some of the densest zoning of the entire plan but is located outside of the Downtown area. Consider including it in the Downtown / Red area.	Montgomery County Department of Transportation	Comment received. Staff will discuss with the Planning Board during the work sessions.
91	Bike Parking Stations	Public Hearing Draft	44	Figure 19 - Show Bike Parking Station locations.	Montgomery County Department of Transportation	Comment received.
92	External Bikeways	Public Hearing Draft	44	Figure 19 - Consider showing bikeways outside the plan area so that it better illustrates how things will fit together as a network. This should include whatever is planned by Gaithersburg & Rockville in their respective areas.	Montgomery County Department of Transportation	Comment received.
93	Travilah - Shady Grove Connector	Public Hearing Draft	44	Figure 19 - Consider whether there should be a ped/bike connection shown between Travilah Rd and Shady Grove Rd, around the point where Shady Grove has the 90° turn. (perhaps as an extension of Nolan Dr) While it's traversable today through private property, it may be good to ensure such a connection is retained into the future. Especially if this area has any zoning changes or is otherwise expected to further develop. (depending on zoning around the Human Genome & USG areas, consider also whether this might be a road to help form a superblock grid & relieve traffic off of Darnestown & Traville Gateway)	Montgomery County Department of Transportation	Comment received.
94	Great Seneca Corridor Connector	Public Hearing Draft	44	Figure 20 - The I-270 Corridor Forward Plan (p5 / PDF p16) retains the CCT's dedicated lanes / Corridor Connector along Great Seneca Hwy west of Muddy Branch. Presuming this is intended to remain, Figure 20 should be updated to show an arrow continuing from Muddy Branch westward along Great Seneca	Montgomery County Department of Transportation	Comment received.

95	Great Seneca Extension Transit Lanes	Public Hearing Draft	44	Figure 20 - Consider transit lanes along the extension of Great Seneca Hwy beyond Darnestown Rd, to Traville Gateway Dr. This connector would approach what is currently envisioned to be a substantial transit center.	Montgomery County Department of Transportation	Comment received.
96	BRT Stations	Public Hearing Draft	44	Figure 20 - Consider identifying GSTN and BRT station locations.	Montgomery County Department of Transportation	Comment received.
97	Great Seneca Extension	Public Hearing Draft	44,51	I do not see the extension of Great Seneca Hwy beyond Darnestown Rd (to Traville Gateway Dr) in Table 2. Based on its being a Town Center Street, I would expect to find it on p51.	Montgomery County Department of Transportation	Comment received.
98	ROW Abandonment	Public Hearing Draft	45-53, 59-61, 67	The narrative on p67 suggests that the ROW repurposed in to the Promenade / Greenway be abandoned and returned to their respective owners. Doing so would place the Sidewalk outside of public authority and would subsequently require Public Improvement Easements (PIEs). However, note that legal concerns have been raised by the County Attorney's Office regarding the efficacy & legality of PIEs. And along State highways, ensure that such an action has buy-in from the State as something that is legally permissible. It is also not clear how these proposed abandonments fit within the master planned rights-of-way given in Table 2 (p45-53)	Montgomery County Department of Transportation	Comment received.
99	SWM in ROW	Public Hearing Draft	46-51, 111	The streets, with the ROWs proposed, may have difficulties providing adequate stormwater management within the ROW. This does not necessarily require action to change anything in the plan, but inaction should be done with the awareness that SWM might not be fully addressed within the ROW.	Montgomery County Department of Transportation	Comment received.
100	LSC Loop Trail	Public Hearing Draft	46-51, 118	Ensure that the "LSC Loop Trail" is defined at some point: whether it's some form of separated bike lanes, Sidepath, or something else. For reference, currently the Bike Master Plan shows it mostly as Separated Bike Lanes on each side of the street. But in the cross-sections the LSC Loop Trail takes on the visuals of a Sidepath.	Montgomery County Department of Transportation	Comment received.
101	Medians	Public Hearing Draft	46-53	Consider denoting whether streets are Divided or Undivided. In the past, the standard way to do this has been to label Divided roadways via the Traffic Lanes information, such as 4D or 6D.	Montgomery County Department of Transportation	Comment received.
102	Identifying Roads	Public Hearing Draft	47-48, 52-53	Add a map labelling the unnamed roads, including Roads B, C, E, F, G, I, J, L, M, Q, R, S, T, U, V, W, Y.	Montgomery County Department of Transportation	Comment received.
103	Curbless & Shared Streets	Public Hearing Draft	48	Road E and Road M: Consider changing "Commercial Shared Street" and "Shared Street" both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Commercial Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. Portions of these streets may be more likely to be Curbless Streets rather than Shared, depending on the amount of vehicle loading expected to use these streets. Vehicle loading may be due to garage access associated with adjacent developments (particularly where they may be unable to fit access points onto other fronting streets), and the more vehicles: the less comfort & efficacy a Shared Street will have. 40' will be very narrow for the type these types of streets if motor vehicles are expected to substantially use these streets for access. I'd suggest 50' ROW if we expect these to Curbless Streets (providing vehicle access to buildings) or 44' ROW if we expect these to be Shared Streets (minimal vehicle access).	Montgomery County Department of Transportation	Comment received.
104	ROWs Below Defaults	Public Hearing Draft	50	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p50 - Corporate Blvd Extended between Omega Dr & Shady Grove Rd - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes	Montgomery County Department of Transportation	Comment received.

105	ROWs Below Defaults	Public Hearing Draft	51	The some streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action:	Montgomery County Department of Transportation	Comment received.
106	ROWs Below Minimums Required	Public Hearing Draft	52, 93	The some streets propose infrastructure that exceeds the ROW available even if everything is reduce to their CSDG minimums. As written the proposed infrastructure is not attainable within the ROW provided. The plan needs to either call for additional ROW or reduce proposed infrastructure.	Montgomery County Department of Transportation	Comment received.
107	ROWs Below Defaults	Public Hearing Draft	52, 85	The some streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action:	Montgomery County Department of Transportation	Comment received.
108	ROWs Below Defaults	Public Hearing Draft	53, 85	The some streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action:	Montgomery County Department of Transportation	Comment received.
109	Curbless & Shared Streets	Public Hearing Draft	53, 85	Road X: Consider changing "Residential Shared Street" and "Shared Street" both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Residential Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. I'm unsure where Road X is, but in general I'd suggest 50' ROW if we expect these to Curbless Streets (providing vehicle access to	Montgomery County Department of Transportation	Comment received.
110	Frontage Zones	Public Hearing Draft	54, 57-61	To start with two FYI's regarding Frontage Zones: - In the Code the Frontage Zones has generally been envisioned as part of the Public ROW. - In CSDG the Frontage Zone along Downtown Streets can be reduced to 0'. The cross-section here shows Frontage Zones outside the public ROW. This may result in Frontage Zones being frequently omitted by developments. However, if Planning/Council intend to see more Frontage Zones: either additional ROW may be necessary, or narrative toward the provision of Public Improvement Easements (PIEs) may be necessary. (Note that legal concerns have been raised by the County Attorney's Office regarding the efficacy & legality of PIEs.)	Montgomery County Department of Transportation	Comment received.
111	Cross-Sections Note	Public Hearing Draft	54-62	Add a note to each cross-section reading: "Cross-section is diagrammatic only for purposes of showing an approximate envisioned layout within planned rights-of-way. Actual design may vary depending on safety & operational needs as well as site constraints."	Montgomery County Department of Transportation	Comment received.
112	Sidewalk Width	Public Hearing Draft	55-56, 62	The CSDG Default Sidewalk Width along Downtown Streets, Town Center Boulevards, & Town Center Streets is 10'. The 8' width shown is acceptable (it is the Minimum Width in CSDG), so this is fine if these sidewalk widths are considered acceptable by Planning & Council. However, if Planning/Council intend for Sidewalks to be their Default width: ROWs of at least 54' (p55) or 79' (p56) will be necessary.	Montgomery County Department of Transportation	Comment received.
113	2-Way SBLs vs 1-Way SBLs w/ Passing Lanes	Public Hearing Draft	58, 60, 61	Where options provide for two-way cycletracks on both sides of the roadway, consider instead having one-way cycletracks going with the direction of traffic and the 2nd bike lane as a passing lane. This creates a wide buffer with space for faster cyclists to safely pass in the bike lane and avoids having bike traffic coming the opposite direction of car traffic.	Montgomery County Department of Transportation	Comment received.
114	Road Diets	Public Hearing Draft	58, 60, 61	The road diets and associated greenways / promenades appears to be proposing to spend large amounts of resources to substantially reconstruct these roads, to little substantive benefit. The area already has large open spaces & they	Montgomery County Department of Transportation	Comment received.

115	Ped Operations	Public Hearing Draft	58, 60, 61	The very wide distance between the roadway and Sidewalk also present several operational challenges: 1) (MCJ) At cross-streets, having the Sidewalk offset by nearly 70' feet (at least 4 car-lengths) from the roadway, it will make intersection design very challenging and will result in the either the Sidewalk having to shift back toward the roadway at every crossing (in which case pedestrians may be likely to walk in the Bikeway), or having unsafe crossings at what will effectively be a separate midblock crossing with no control for vehicles due to the proximity to the existing intersection. 2) (MCJ) If transit service is present: there is a large distance between any transit stops and where people are expected to walk. This may result in pedestrians walking in the Bikeway. 3) (CVA) The wide rights-of-way in the plan area today contribute to the poor pedestrian environment, particularly in making destinations feel more distant than they actually are. There is a risk of retaining these issues with these wide corridors.	Montgomery County Department of Transportation	Thanks for noting this; we share your concerns and would appreciate your ideas for addressing them. 1. I should have noted that everything between the ped/bike buffer and the general purpose travel lanes in the Promenade is open for more detailed design. We'd appreciate your input on designing bike and pedestrian facilities within the open space that balance providing access to the buildings on the north side of the ROW, access to the curb, and safe crossings. One precedent example is Eastern Parkway in Brooklyn, NY; our case would a be a bit simpler since we are not recommending a service road. We're also hoping to activate the promenade area with kiosks, pavilions, paths, and other features. Could pedestrian and bike signals at the crossings of perpendicular north/south streets be coordinated with the signals on Key West? 2. There is existing transit service on Key West Ave and, although we are not currently proposing dedicated transit lanes on Key West, we imagine transit service would continue to be provided. We would envision pedestrian pathways through the promenade area to connect transit stops to adjacent buildings. This would be an improvement over the existing condition where transit stops are separated from adjacent buildings by surface parking lots with no pedestrian pathways (e.g., Key West
116	Fire Access	Public Hearing Draft	59-61	A building frontage can be a maximum of 50' from a Fire Access. A Fire Access requires a 12' travelway designed to support heavy vehicles, plus an additional 8' flush area for outriggers. The cross-sections on pages 59-61 will require that the Sidewalk & a portion of adjacent areas be designed as a Fire Access route. This does not necessarily require action to resolve, provided Planning & Council are comfortable with Sidewalks being designed to function as Fire Access, and that some amount of additional space will be required for the outrigger areas. This space might come from either the Future Recreation areas, or by requiring at least some amount of Frontage Zone. Fixed objects would be limited within the areas required for outriggers.	Montgomery County Department of Transportation	Thanks for bringing this to our attention.
117	Phrasing	Public Hearing Draft	64	#1 Belward, 1st new bullet on p64: This currently reads: >>> Step new buildings down to 60 to 80 feet depending on whether they are adjacent to the Belward Farm, to be decided at site plan review.<<< Is this meant to read "Step new buildings down to 60 or 80 feet" ?	Montgomery County Department of Transportation	Comment received.
118	Surface Lot Microgrids	Public Hearing Draft	71, 86-87, 112	(GE) All parking areas above a certain size should consider including a microgrid (or possibly be required to have a microgrid). (SLB) Though consider also that implementing microgrids atop surface lots may discourage or delay their future redevelopment.	Montgomery County Department of Transportation	Comment received.
119	Forest Conservation Areas	Public Hearing Draft	72	#5 includes the following: >>> Protect existing forests to provide carbon sequestration, heat island mitigation, air and water filtration, watershed protection, support of biological diversity, and proven physical and mental health benefits. <<< While this is a good goal, generally, in what is intended to be a Downtown area this may pose unintended consequences. There are	Montgomery County Department of Transportation	Comment received.
120	Biotech Exemptions	Public Hearing Draft	74	The Implementation section should note that Biotech is not presently required to do follow Local Area Transportation Review (LATR) nor pay impact taxes. Given the substantial amount of biotech existing and expected: this could have a substantive effect on plan implementation.	Montgomery County Department of Transportation	Comment received.
121	CIP Projects	Public Hearing Draft	75-76	Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through which appear to be missing: - New Street Grid roadways (p39, 41); - Enumerate all changing street sections (p42 & upgraded sidepath widths (p40); - Protected Crossings (p41); - Bike Parking Stations a transit stations, trails, parks, public open spaces, large employment / retail centers (p40); - Implement Bike Parking Stations at Bike Plan areas: Belward, Adventist, PSTA (p40,64)	Montgomery County Department of Transportation	Comment received.
122	Lead agencies	Public Hearing Draft	75-76	SHA and MCDOT should be co-leading agencies for right-size intersections; signalize, restrict or close median breaks; consolidate, remove or relocate driveways; and walkways and bikeways network since each agency is responsible for its ROW and they need to collaborate when they intersect.	Montgomery County Department of Transportation	Comment received.
123	CIP Page Numbers	Public Hearing Draft	75-76, 88, 95, 100, 106, 113, 120	Consider adding a column that includes page references to where the project is substantially referenced.	Montgomery County Department of Transportation	Comment received.
124	Formatting	Public Hearing Draft	80	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 34,35).	Montgomery County Department of Transportation	Comment received.

125	PEPCO Trail Breezeway	Public Hearing Draft	83	The PEPCO Power Line trail along the north side of the Quince Orchard area is currently designated by the Bike Master Plan as a Breezeway. Given that the Breezeway is named on p91 and p95, I presume this is simply an oversight & this just needs the accompanying line weight to indicate a Breezeway. If the Plan is proposing to remove the Breezeway status from the PEPCO Power Line trail, then we strongly urge hesitation & that this be discussed during worksessions. This connection would provide an excellent east-west connection knitting the Upcounty area together & its removal would result in a lower quality product.	Montgomery County Department of Transportation	Comment received.
126	Formatting	Public Hearing Draft	83-84	Consider aligning the maps across each of these three pages (Figures 36, 37). Consider also whether to crop these graphics to focus on the NIST / Londonderry / Hoyle's Addition area.	Montgomery County Department of Transportation	Comment received.
127	Formatting	Public Hearing Draft	84	Figure 37 - The legend is missing.	Montgomery County Department of Transportation	Comment received.
128	Noise Study / Wall	Public Hearing Draft	86	D, Natural Environment: #1 says to conduct a noise study, and #2 says to construct a noise wall & vegetative barrier. Is #2's recommendation a predetermined result of #1? Or is #2 already affirmed to be necessary, and #1 would be to identify additional needs in addition to the wall/barrier?	Montgomery County Department of Transportation	Comment received.
129	Formatting	Public Hearing Draft	92	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 39, 40).	Montgomery County Department of Transportation	Comment received.
130	New Figures	Public Hearing Draft	92-93	A reader may not think to find the transportation figures for Quince Orchard located in the NIST / Londonderry / Hoyle's Addition section (p83-84). Consider copying these graphics and adding them between pages 92 and 93.	Montgomery County Department of Transportation	Comment received.
131	Formatting	Public Hearing Draft	104	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 44, 45).	Montgomery County Department of Transportation	Comment received.
132	Railway ROW	Public Hearing Draft	107	Add the CSX / WMATA Railway as a row to Table 10. This should provide the ROW needs necessary to provide a 3rd track for CSX / Amtrak / MARC, and also to provide bidirectional track for the Red Line Extension proposed by the I-270 Corridor Forward Plan.	Montgomery County Department of Transportation	Comment received.
133	Formatting	Public Hearing Draft	109	Consider substantially enlarging Figure 46.	Montgomery County Department of Transportation	Comment received.
134	Formatting	Public Hearing Draft	110	Figure 47 and 48 are the same graphic albeit with different legends. Consider some way to make this clearer, or at least enlarge these Figures to make them more legible.	Montgomery County Department of Transportation	Comment received.
135	ROWs Below Defaults	Public Hearing Draft	111	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p111 - Gaither Rd between City of Gaithersburg & Shady Grove Rd - 90' Proposed ROW, 100' Default ROW, 104' all default widths, 70' all minimum widths - Will result in reducing the 12' total Frontage Zone area to 7' total (averaging 3.5' on each side). - p111 - Industrial Dr between Gaither Rd & Gaithersburg City Limit - 70' Proposed ROW, 80' Default ROW, 82' all default widths, 48' all minimum widths - May result in either the narrowing of Frontage Zones on one or both sides, or the elimination of parking along one side of Industrial Dr.	Montgomery County Department of Transportation	Comment received.
136	ROWs Below Defaults	Public Hearing Draft	118	The following street proposes infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p118 - Decoverly Dr Extended between Fields Rd & 675' West of Washingtonian Blvd - 75' Proposed ROW, 80' Default ROW, 119' all default widths, 70' all minimum widths - Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes	Montgomery County Department of Transportation	Comment received.

137	Formatting	Public Hearing Draft	122	Change "side path" to "sidepath" to reflect the formal naming in the County Code.	Montgomery County Department of Transportation	Comment received.
138	Transpo Analyses	Transportation Appendix	14	The plan does not meet the Travel Time metric directed by Council in December 2020, with estimated travel times for both auto and transit increasing by 1 minute at plan-buildout. This reflects a +6% increase for auto trips and +2% increase for transit trips. We do not necessarily oppose increased auto travel times, particularly noting the spirit of the recently approved Thrive Montgomery 2050 update to the General Plan. However, travelers must have options, and reductions in auto access must be paired with improvements in transit access. That said, a 1 minute / 2% increase for transit trips is not particularly substantial, and we understand from Planning staff that this reflects a nuance of how the metric is calculated rather than any forecast degradation of service. We defer to Planning and Council for consideration of this issue and whether additional transit infrastructure may be necessary.	Montgomery County Department of Transportation	Comment received.

ATTACHMENT B

OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

M E M O R A N D U M

March 8, 2024

TO: Artie Harris, Chair
Montgomery County Planning Board

FROM: Marc Elrich, County Executive

SUBJECT: Transmittal of Comments on the Great Seneca Plan: Connecting Life and Science

Pursuant to Sec. 33A-5 of the County Code, I am submitting Executive Branch comments on the Great Seneca Plan in advance of the public hearing to be held on March 14, 2024. The attached document presents comments from the Department of Environmental Protection, Department of Transportation, and Department of Housing and Community Affairs.

The departments are available to answer any questions you may have and look forward to working with you and your staff throughout the review process.

cc: Jon Monger, Director, Department of Environmental Protection
Chris Conklin, Director, Department of Transportation
Scott Bruton, Director, Department of Housing and Community Affairs
Amy Stevens, Manager, Department of Environmental Protection
Haley Peckett, Deputy Director, Department of Transportation
Andrew Bossi, Sr Planning Specialist, Department of Transportation
Somer Cross, Housing Chief Manager, Department of Housing and Community Affairs
Debbie Spielberg, Special Assistant to the County Executive
Dale Tibbitts, Special Assistant to the County Executive
Claire Iseli, Special Assistant to the County Executive
Meredith Wellington, Land Use Planning Policy Analyst to the County Executive

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Marc Elrich
County Executive

Jon Monger
Director

MEMORANDUM

February 29, 2024

TO: Marc Elrich, County Executive

FROM: Jon Monger, Director
Department of Environmental Protection

SUBJECT: The Great Seneca Plan: Connecting Life and Science

As requested, the Department of Environmental Protection has reviewed the Great Seneca Plan: Connecting Life and Science (public hearing draft winter 2024) and is submitting the following comments and recommendations from the Watershed Restoration Division.

Overall comments and recommendations:

The Plan's environmental recommendations are highlighted under the "Natural Environment" section by area location within the plan. The recommendations generally include the following:

- Increase of green cover.
- Minimize impervious surface cover.
- Increase the use of bioswales and rain gardens.
- Increase of tree canopy coverage.
- Protect specific areas with existing natural resources.

While we agree with the stated goals, the Plan does not provide details on how to accomplish them or who is responsible for ensuring they are achieved. "Increase green cover and tree canopy coverage" is a key recommendation of the Plan. However, most of the Plan does not provide specific recommendations on how to accomplish this goal. Without specifics, achieving increased canopy coverage may not be an achievable goal. Although there are provisions for providing 35% "green cover" during site development, it is unclear if this would increase or decrease from existing conditions. Furthermore, the amount of benefit the green cover provides would vary significantly by the type of green cover used.

Likewise, minimization of impervious cover is also one of the key recommendations identified in multiple areas of the Plan. However, it does not provide specificity on how to achieve that goal. This recommendation competes with other recommendations that would increase impervious

surfaces, such as increasing bike paths and sidewalks within the Plan. Increases in bike paths and sidewalks will likely not receive full stormwater management treatment. As a result,

receiving watersheds will deteriorate due to both an increase in impervious surfaces and a lack of stormwater management for those surfaces.

To reduce the impacts of imperviousness as development and redevelopment occur, the Plan should identify specific impervious surface target percentages (caps) for each area that do not allow for exemptions from bikeways or other features. Impervious footprints of public and private properties should be minimized with pervious surfaces and/or soil decompaction utilized where possible. Also, attention should be given to the appropriate sizing and types of stormwater management essential to maintaining and improving existing water quality and flow conditions.

Existing new and redevelopment stormwater management regulations for Environmental Site Design (ESD), to the maximum extent practicable, are designed to provide water quality treatment. These practices do not provide flood control and cannot mitigate the flooding concerns identified in this plan for Rosemont, Oakmont and Walnut Hill, and Hi Wood. DEP recommends that the references to using stormwater management for flood mitigation should be removed and that programmatic and policy recommendations developed through the Comprehensive Flood Management Plan should be adopted for these areas.

Specific comments and recommendations:

1. Transportation recommendations for the Life Sciences Center on pages 39 and 40 of the Plan have the potential to reduce impervious surfaces, such as repurposing travel lanes, narrowing travel lanes, and minimizing curb radii. However, it is unclear whether the additional right-of-way space this frees up would actually result in reduced impervious surfaces or if it would be repurposed as other non-roadway impervious surfaces. The additional space can be used for expanding non-vehicular transportation modes, but it should also be recommended that the space be used for expanding pervious surfaces, tree planting, and stormwater management.

2. Bullet 5 on page 72 states, “Protect existing forests...:” There are already State and County requirements for forest protection. Unless additional requirements are stipulated, it is unlikely that this statement will accomplish its intent. The section for the Washington Residential area specifies the protection of 35% of the forest. This should be done for other areas, including this one. This also applies to other sections with similar recommendations.

3. Bullet 7 on page 72 states, “Include artificial shading features in paved and hardscaped areas where there is limited soil to support tree growth.” It is recommended to reword this similar to the following: “Plant trees wherever possible to shade paved and hardscape areas. If tree

planting is not possible, provide artificial shading features." This also applies to other sections with similar recommendations.

4. Bullet 8 on page 72 states, "Protect existing sensitive species, including in areas underlain by serpentine bedrock, which supports rare species." If sensitive species are already known, then actions and specific instructions on how to protect the existing sensitive species should be included in the plan. Depending on the needs and locations of the individual sensitive species, these actions can include, but would not be limited to, preserving habitat, providing fencing, and providing vegetative management.

5. Bullet 4 on page 72 states, "Increase the use of bioswales and rain gardens, especially in the Piney Branch Special Protection Area [SPA]." These are both forms of ESD. The state requires ESD to be implemented to the maximum extent practicable. If the intent that stormwater management be provided above and beyond State requirements, this needs to be stated and a metric for the additional treatment provided. Likewise, there are already additional requirements for the Piney Branch SPAs. If the intent is to provide additional stormwater management, this needs to be stated and a metric defined.

6. Bullet 11 on page 87 of the Plan states, "Protect the Long Branch Stream and forest within the stream buffer." If the intent is to provide additional protection above and beyond what is already required for stream buffers, then this needs to be stated and a metric defined. DEP recommends further review of the area for additional opportunities, such as stormwater management or expanding riparian buffer, to add protection to the stream.

7. The Washingtonian Light Industrial Park is identified as having 80% impervious on page 112 of the Plan. One of the recommendations is to minimize impervious surfaces whenever developing or redeveloping a site. An impervious cap should be set in place to reduce the current 80% imperviousness to a lower impervious target.

8. On Page 71, the Plan recommends including solar energy as a part of the green cover accounting. Although increasing the use of on-site solar generation can be beneficial, allowing it to count as "green cover" does not align with the general intent of a green cover requirement. Solar energy would not provide services of green, or vegetative cover, such as stormwater runoff reduction, heat island reduction, impervious surface reduction, air pollutant mitigation, and providing habitat. If the intent is only to allow solar energy to count toward green cover when combined with green roofs, there is still the concern that green roofs are still impervious surfaces – this issue would also apply to green roofs without solar energy. Additionally, it is uncertain how well a green roof would perform/survive beneath solar panels. The green roof and solar exceptions to green cover could result in some sites

being 100% impervious. DEP recommends removing green roofs and solar panels from "green cover" accounting.

9. Page 96 states, in the context of the RainScapes program, "But they do not address the many individual existing properties that contribute to flooding and erosion problems that are growing worse due to climate change." There are potentially multiple reasons, not exclusive to climate change, for increases in flooding and erosion. This statement should acknowledge that existing properties are negatively impacting water quality and contributing to poor stream health even without climate change. DEP recommends adding a sentence, such as: "Landcover changes through lawn and impervious pavement reductions back to managed forest or conservation landscapes and restoring soil health will be necessary to mitigate development impacts and dedicated stormwater management retrofits, which may include both green and grey solutions."

10. The Plan on page 123 states that the Hi Wood area lacks redevelopment opportunities and recommends RainScapes on private properties and stormwater retrofit along the roadway with the Montgomery County Department of Transportation (MCDOT) as the leading agency. Although the County's RainScapes resources are available to all residents, the Plan should highlight the City of Rockville's RainScapes program as an additional available resource.

Marc Elrich
County Executive

Christopher R. Conklin
Director

DEPARTMENT OF TRANSPORTATION

M E M O R A N D U M

February 29, 2024

TO: Greg Ossont, Deputy Director
Department of General Services

FROM: Haley Peckett, Deputy Director for Transportation Policy
Department of Transportation

SUBJECT: Great Seneca Plan: Connecting Life and Science
Public Hearing Draft – Executive Branch Comments

Thank you for the opportunity to review the Winter 2024 Public Hearing Draft of the Great Seneca Plan. In addition to the attached detailed technical comments, we would like to highlight several more significant issues. In the items below, footnotes identify the associated comment number in the attached detailed technical comments.

1) **TRANSPORTATION ANALYSIS:**[77] The plan does not meet the Travel Time metric directed by Council in December 2020, with estimated travel times for both auto and transit increasing by 1 minute at plan-buildout. This reflects a +6% increase for auto trips and +2% increase for transit trips. Degradation in auto travel times should be paired with multimodal benefits, but the Great Seneca Plan demonstrates no benefit for transit travel time.

   We recommend that Planning and Council consider additional transit infrastructure or pairing auto travel times with other estimates of improvements to non-automobile modes. We also note that we have been working with Planning on the development of new master plan metrics which may better identify issues, needs, and actionable recommendations to resolve these sorts of issues for future plans.

2) **KEY WEST, GREAT SENECA:** We support reducing the prominence of auto travel through the area, including the development of a denser grid network of streets, eliminating the unbuilt interchanges, and the multitude of improvements for transit, bicycle, and pedestrian travel. However, the road diets along Key West Avenue and Great Seneca Highway appear to have high costs while not appearing to provide substantive mobility benefit.

- **COST:** Reconstructing these roadways will be very expensive and is not expected to yield any transportation benefit. It is also unclear whether the right-of-way will be retained if it is not used for a transportation purpose.[37] We tentatively estimate a cost of over $142 million for reconstruction of Key West Avenue between Darnestown Road and Shady Grove Road, and over $34 million for reconstruction of Great Seneca Highway between Key West Avenue and Darnestown Road.[53]

- **AUTO MOBILITY:**[53] Key West Avenue (Maryland 28) in particular is a very significant route for long distance travel within Montgomery County. The route is the main link from the central portion of the County to portions of Gaithersburg, South Germantown, Darnestown, Seneca, Travilah, Poolesville, Dickerson and other towns in the rural portion of the County. Residents in these areas have few options other than to travel by automobile and many have limited services within their local community.

  Although it is not intuitive at first glance, increasing the density of the grid of intersecting streets is likely to require more width on the principal roads as the shorter block lengths would provide less space for motor vehicle queues. Determining the balance of grid density and road width will require much more detailed traffic analyses to affirm viability, and particularly along Key West Avenue. The intersection-level impacts are likely to be so substantial as to render this recommendation infeasible to safely implement.

- **NON-AUTO MOBILITY:**[54] The concepts presented for these roads appear to hamper connectivity in this area rather than improve it. This large expense does not provide any additional facilities for transit vehicles. The promenade and greenway would introduce difficulties also for pedestrians, who would have to weave to and from the roadway at each intersection or to access bus stops. Bicyclists would also likely be faced with significant volumes of pedestrians taking the shortest path by walking in the separated bike lanes.

- **OPEN SPACES:**[54] Looking at potential benefits, we recognize the goal to create additional open spaces, but the area already has substantial open spaces. These same open spaces contribute to what, today, feels like an excessively open landscape that feels time-consuming to traverse despite being comparable in area to Downtown Bethesda and Silver Spring. With the large rights-of-way remaining in place, the proposed promenade and greenway would not change this sense of scale. If more public space is needed, DOT recommends that this space be conceived as a gathering space more central to the development nodes, rather than long strips of space along the major roads.

- **RECOMMENDATION – LIMITED CHANGE:**[53] We recommend that changes in block size and investment in new street capacity be targeted to balance cost and benefits. The most beneficial elements of the plan's recommendations are the dense street grid and establishment of a more urban form in the plan area.

  Modifications to these roads to reduce their impact on the environmental quality and multimodal travel are possible. On Great Seneca Highway, through recent work conditioned by the Planning Board for the redevelopment of the former Public Safety Training Academy (PSTA), two new traffic signals were installed on Great Seneca Highway and a new multiuse trail is under construction. These new interventions in the road have dramatically calmed traffic on this stretch of the road. Further interventions such as better-defining the median, further reducing lane widths and increasing the quality of streetscape, at a fraction of the cost of the promenade concept, may more effectively help achieve walkability and placemaking for the area.

- **RECOMMENDATION – DARNESTOWN RD:** An alternative focal point for modifying arterial roads might be Darnestown Road, which has been intended to become a more locally-oriented roadway since the completion of Key West Avenue. This corridor is not uniform in design, reflective of decades of modifications to portions as developments have occurred. Development is also closer to this road and its configuration is a major barrier to walking and biking. The corridor also exhibits speeds and noise impacts that are in conflict with the surrounding uses.

  This corridor would pose fewer challenges toward reducing the number of lanes, and developing this into a Main Street corridor might help knit two important but separated areas of the plan. The Medical Center and PSTA areas are to the north, and the Universities at Shady Grove campus has a strong potential for supporting growth to the south. Furthermore, Traville Gateway is the site of a major transit hub, and there has been substantial recent development immediately west of Traville Gateway.[53] Changing the capacity of Darnestown Road will likely redirect traffic flow to Medical Center Drive, now under construction through the former PTSA site, and to Key West Avenue (Maryland 28), which is the intended to be the major traffic conduit in this area.

3) **DENSITIES:**[11] The densities within the Downtown area (per p. 43, Figure 18) feel unambitious for what is expected of a Downtown / Red area. These areas are preferred to have FARs in the vicinity of 2.0 or 3.0 rather than the 1.0 and 1.5 assigned to most of the area. We note that the Universities at Shady Grove (USG) site has some of the highest densities of the plan area despite being located outside of the Downtown / Red area.[29] Higher densities in the area would also extract greater benefit from investments in dedicated transitways & accompanying bus services. Consider whether the Downtown / Red area should have larger FARs, and whether the USG site should be included in the Downtown / Red area.

4) **ROADWAY ROWS:** Two streets may be short on available rights-of-way to provide the proposed infrastructure. Road T is 14' short of being capable of achieving all proposed

infrastructure at their minimum widths. Clopper Road between Longdraft Road and Great Seneca Creek may also have limited right-of-way, though these limitations may be surmountable with more detailed design.[45]

There are a multitude of streets which would require narrowing various street elements below their default Complete Streets widths, but they would still meet Complete Streets requirements. Our comments detail which street elements would be affected. These do not necessarily require action, provided Planning and Council are comfortable with the narrowed widths.[43, 44, 46, 47, 74, 75]

There are also numerous streets which may not have adequate rights-of-way to treat stormwater within the right-of-way. Again, these do not necessarily require action, provided Planning and Council are comfortable with these segments potentially being unable to treat stormwater in-situ. More detailed evaluation and design may resolve some of these issues.[38]

5) **BIOTECH EXEMPTIONS:**[59] The Implementation section should note that Biotech is not presently required to do follow Local Area Transportation Review (LATR) nor pay impact taxes. Given the substantial amount of existing and expected Biotech, this could have a substantive effect on plan implementation.

6) **RAILWAY ROW:**[71] Add the CSX / WMATA Railway into the right-of-way tables. This should require adequate rights-of-way necessary to provide a third track for the CSX / Amtrak / MARC corridor as well as bidirectional track for the Red Line Extension proposed by the I-270 Corridor Forward Plan.

7) **LSC LOOP TRAIL:**[39] Ensure that the "LSC Loop Trail" is defined. Between this plan and other previous plans, it is unclear whether the LSC Loop Trail consists of separated bike lanes or sidepath.

8) **UNNAMED ROADS MAP:**[41] Add a map labelling the unnamed roads.

Notwithstanding the volume of our comments for such a complex plan, many of the potentially more substantial issues were resolved earlier in the process by the excellent efforts led by Planning staff. We greatly appreciate the degree of partnership that went into developing the Public Hearing Draft.

Attachments: Detailed Comments

cc: Andrew Bossi, MCDOT
Chris Van Alstyne, MCDOT
Kara Olsen-Salazar, MCDGS
Claire Iseli, CEX
Meredith Wellington, CEX

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
1		Policy	ADB	Public Hearing Draft	General	Graphics Legibility	Many of the graphics are very small & use low-resolution imagery, making it difficult to zoom in and view details. Graphics need to be enlarged & use higher-resolution imagery.			
2	*	Policy	ADB	Public Hearing Draft	General	Colorblind Accessibility	Consider reviewing graphics for colorblind accessibility. Some graphics (such as Figures 41 and 42; the only two I tested) appear to post some colorblind accessibility challenges.	3		
3	****	Policy	ADB	Public Hearing Draft	4, 23, 31, 73	Complete Communities Metrics	A "Complete Community" still have no measurable metrics to determine what they are, how to pursue them, & whether they are being achieved. We understand that these metrics are still in development. I have previously suggested the following metrics: (1) What target land uses are expected to be reachable, (2) within what defined timeframes (3) of traveling by what mode? For example: a plan might 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.			
4		Policy	ADB	Public Hearing Draft	6	Formatting	Crop the bottom of the graph & scale it to be larger.	3		
5		Policy	ADB	Public Hearing Draft	7	Formatting	Consider splitting Figures 2 and 3 into onto two separate pages, side-by-side on a two page spread. This will allow them to be larger. Alternately, if kept on the same page: move the legend above or beneath them to afford both maps to be larger.	3		
6		Policy	ADB	Public Hearing Draft	14	Guiding Plans & Policies	Consider including the 2018 Bicycle Master Plan and the 2023 Pedestrian Master Plan.	3		
7		Policy	ADB	Public Hearing Draft	16-18	Formatting	Consider aligning the maps across each of these three pages (Figures 4, 5, 6), as well as moving the legend further right & enlarging each map.	3		
8		Policy	ADB	Public Hearing Draft	20-21	Formatting	Consider aligning the maps across each of these two pages (Figures 7,8), as well as moving the legend further right & enlarging each map.	3		
9		Policy	ADB	Public Hearing Draft	27	Formatting	The footnote area appears to have a lot of extra whitespace. Removing this whitespace should allow the text to fit in one column & the graphic to be larger. Move Figure 10's legend beneath it to give more space for the graphic to enlarge.	3		
10		Policy	ADB	Public Hearing Draft	33-35	Formatting	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 12, 13, 14, 15).	3		
11	*****	**Policy**	**ADB**	**Public Hearing Draft**	**35**	**Densities**	**The densities within the Downtown area (per p43, Figure 18) feels unambitious for what is expected of a Downtown / Red area, which is preferred to have FARs more in the vicinity of 2.0 or 3.0 rather than the 1.0 and 1.5 assigned to most of the area. Higher densities would also extract greater benefit from investments in dedicated transitways & accompanying bus services.** **Consider whether the Downtown / Red area should have larger FARs. If Planning or Council agree with evaluating greater densities: the Plan must ensure that transportation infrastructure (particularly transit access) remains capable of supporting these additional densities, or if additional infrastructure would be needed.**	1		
12	****	Policy	ADB	Public Hearing Draft	35	Zoning for Public Properties	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.			
13		Policy	ADB	Public Hearing Draft	35	Divided Property	The area labelled with (5) and bounded by Shady Grove Rd, Research Blvd, Omega Dr, and I-270 is split between a Downtown and Town Center area (per p43, Figure 18), and subsequently also between a Red and Orange policy area (per p39, #6). Consider whether the zoning should be split into two different types, or if the site should be entirely a Downtown/Red or entirely a Town Center/Orange area.			
14		Policy	ADB	Public Hearing Draft	36	Formatting	The table runs over the footer information. Consider doing the following: - Shrink the width of the Map Number column - Increase the width of the two Zoning columns - Shift the table slightly upward - Shrink font as needed (though the previous suggestions should be enough to resolve the issue)	3		
15		Policy	ADB	Public Hearing Draft	37	Formatting	The footnote area appears to have a lot of extra whitespace. Removing this whitespace should allow the text to fit on one page.	3		
16	*****	Policy	ADB	Public Hearing Draft	38-40	Parking Lot District	A recommendation should be included regarding the existing Parking Lot District for the area. Options include: - Retain the PLD as-is, generally focused on existing parking meters within the PLD. - Expand the PLD or its mission for the area. This might utilize existing public properties or private properties to construct new garage facilities. These facilities could help other developments proceed with less parking of their own. These facilities might also be situated as to convert motorists along Boulevards into pedestrians/bicyclists within the area, reducing traffic load on the internal Streets. NOTE: A map of the PLD is available at https://www.montgomerycountymd.gov/DOT-Parking/Resources/Files/PLDGSSC.pdf			

0	Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
17	Policy	ADB, CVA	Public Hearing Draft	39	Impossible Infill Road Connections	The sub-bullet for #1 reads as follows: >>> Where development occurs within master-planned blocks that are more than twice as large as the sizes recommended in the Complete Streets Design Guide, proposed developments must provide additional non-master planned street connections to reduce block size. If providing a complete street connection is not possible, developments must dedicate right-of-way to advance the eventual construction of the non-master planned street connection. <<< It is not clear what circumstances would render such a connection impossible to build. The second sentence may either need removal, elaboration, or may need to give a different path forward. Elaboration might clarify what is considered not possible to build, and what is expected of an applicant to assert that the facility is not possible to build. One potential case might be a facility requires ROW beyond an applicant's control, which would be a reasonable limitation where ROW dedication would be helpful. However, if it is considered "not possible" due to technical limitations such as grade, terrain, environmental features, etc: the applicant should demonstrate why it is impossible* to navigate these difficulties. And it is not clear how dedicating ROW for future construction would change those circumstances. In such situations we might perhaps enter negotiations with the applicant to identify alternative options that meet the spirit of the master plan. This might, for example, replace a street connection with a ped/bike connection along the same path. ---------- * - Note also that using the word "possible" in lieu of "feasible" will hold applicants to an exceedingly high standard, as "possible" is fiscally unconstrained. It is unlikely that there will be any situations at all which are truly "not possible" to achieve.			

18	Policy	ADB	Public Hearing Draft	39	Channelized Rights	#2, 3rd Sub-Bullet:
						
						Change...
						>>> Remove channelized right-turn lanes from all intersections. <<<
						
						...to:
						>>> Remove channelized right-turn lanes from all intersections where roadway geometry allows. <<<
						
						This is to allow for circumstances where roads may intersect with a high skew, and channelized rights may be preferable for pedestrian comfort than navigating very large intersection radii (as per the 5th sub-bullet). Additional information is available in Complete Streets, Section 6.7 (p204)			

19	Policy	ADB	Public Hearing Draft	39	Alleys	#8 reads:
						>>> Build out a network of alleys in the downtown and town center area types to support loading and site access. <<<
						
						This recommendation may be fine as-is, but staff should consider how this will be implemented with new developments, and whether this item may need any additional elaboration to ease the development review process. Considerations may include how to situate alleys & onto what streets they access, types of loading onto alleys, whether they serve primary motor vehicle access, whether alleys would be public or private, etc
						
						Consider the following phrasing:
						
						>>> Build out a network of alleys in the downtown and town center area types to support loading and primary site access. <<<			

20	Policy	ADB	Public Hearing Draft	40	Crosswalks Graphic	Consider including the graphic from the Pedestrian Master Plan that shows different types of crosswalks and their names.	3		

21	Policy	ADB	Public Hearing Draft	40	Crosswalk Type	#9, 1st Sub-Bullet:
						
						Change...
						>>> Upgrade all intersections with high-visibility continental crosswalk markings for all pedestrian approaches. <<<
						
						...to:
						>>> Upgrade all intersections with high-visibility continental or ladder crosswalk markings for all pedestrian approaches. <<<
						
						This is to allow for either option, as standards may change. While Continental is our current standard we are starting to shift toward Ladder per the Pedestrian Master Plan.			

22	Policy	ADB	Public Hearing Draft	40	Formatting	#10, 2nd Sub-Bullet: Change "side paths" to "sidepaths" to reflect the formal naming in the County Code.	3		

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
23		Policy	ADB	Public Hearing Draft	40	Bike Parking Stations	#10, 4th Sub-Bullet: Confirm that Bicycle Parking Stations are intended for "transit stations; trails, parks, and public open spaces; and large employment or retail centers." The FIS will reflect these are structured parking for bicycles. If something less intensive is intended by this recommendation then the phrasing should be altered. Perhaps to "covered bike parking" or something along those lines.			
24		Policy	ADB	Public Hearing Draft	41	Interparcel Ped Connectivity	#16 - Consider an additional sub-bullet reading something along the lines of: "Promote interparcel pedestrian and bicycle connectivity through accessible sidewalk and sidepath connections between sites."			
25	*	Policy	ADB	Public Hearing Draft	41	Curbless & Shared Streets	#16, 3rd Sub-Bullet: Change "shared streets" to "Curbless and Shared Streets" to reflect the parlance of this ongoing Planning-MCDOT effort.	3		
26		Policy	ADB	Public Hearing Draft	41-44	Formatting	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 16, 17, 18, 19, 20).	3		
27	*	Policy	ADB	Public Hearing Draft	41-44, 83-84	Curbless & Shared Streets	Figures 16, 17, 18, and 19: Consider changing "Shared Street" (Fig.16,19) and "Commercial Shared Street" (Fig.17,18) both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Commercial Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. Portions of these streets may be more likely to be Curbless Streets rather than Shared, depending on the amount of vehicle loading expected to use these streets. Vehicle loading may be due to garage access associated with adjacent developments (particularly where they may be unable to fit access points onto other fronting streets), and the more vehicles: the less comfort & efficacy a Shared Street will have.			
28		Policy	ADB	Public Hearing Draft	42-44	Sharp Turns	The maps show several sharp turns in roads, such as along Research Blvd Extended. These may be OK as shown, but must be done so with the awareness that implementation may not necessarily reflect such sharp turns. Sharp turns may be acceptable if they occur at distinct intersections (such as with other streets not shown on these maps, or with driveways). The plan might include narrative to this effect, or simply an acknowledgment during Planning Board / Council worksessions that this is acknowledged.			
29		Policy	ADB	Public Hearing Draft	43	USG Area Type	The USG site has some of the densest zoning of the entire plan but is located outside of the Downtown area. Consider including it in the Downtown / Red area.			
30	*	Policy	ADB	Public Hearing Draft	44	Bike Parking Stations	Figure 19 - Show Bike Parking Station locations.	3		
31	*	Policy, Devel Rvw	ADB, RT	Public Hearing Draft	44	External Bikeways	Figure 19 - Consider showing bikeways outside the plan area so that it better illustrates how things will fit together as a network. This should include whatever is planned by Gaithersburg & Rockville in their respective areas.			
32	*	Policy	ADB	Public Hearing Draft	44	Travilah - Shady Grove Connector	Figure 19 - Consider whether there should be a ped/bike connection shown between Travilah Rd and Shady Grove Rd, around the point where Shady Grove has the 90° turn. (perhaps as an extension of Nolan Dr) While it's traversable today through private property, it may be good to ensure such a connection is retained into the future. Especially if this area has any zoning changes or is otherwise expected to further develop. (depending on zoning around the Human Genome & USG areas, consider also whether this might be a road to help form a superblock grid & relieve traffic off of Darnestown & Traville Gateway)			
33	****	Policy	ADB	Public Hearing Draft	44	Great Seneca Corridor Connector	Figure 20 - The I-270 Corridor Forward Plan (p5 / PDF p16) retains the CCT's dedicated lanes / Corridor Connector along Great Seneca Hwy west of Muddy Branch. Presuming this is intended to remain, Figure 20 should be updated to show an arrow continuing from Muddy Branch westward along Great Seneca. https://montgomeryplanning.org/wp-content/uploads/2022/09/Corridor-Forward-final_web.pdf#page=16	3		
34	****	Policy	ADB	Public Hearing Draft	44	Great Seneca Extension Transit Lanes	Figure 20 - Consider transit lanes along the extension of Great Seneca Hwy beyond Darnestown Rd, to Traville Gateway Dr. This connector would approach what is currently envisioned to be a substantial transit center.			
35	*	Policy	ADB	Public Hearing Draft	44	BRT Stations	Figure 20 - Consider identifying GSTN and BRT station locations.			
36	****	Policy	ADB	Public Hearing Draft	44,51	Great Seneca Extension	I do not see the extension of Great Seneca Hwy beyond Darnestown Rd (to Traville Gateway Dr) in Table 2. Based on its being a Town Center Street, I would expect to find it on p51.			

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
37		Policy	ADB	Public Hearing Draft	45-53, 59-61, 67	ROW Abandonment	The narrative on p67 suggests that the ROW repurposed in to the Promenade / Greenway be abandoned and returned to their respective owners. Doing so would place the Sidewalk outside of public authority and would subsequently require Public Improvement Easements (PIEs). However, note that legal concerns have been raised by the County Attorney's Office regarding the efficacy & legality of PIEs. And along State highways, ensure that such an action has buy-in from the State as something that is legally permissible. It is also not clear how these proposed abandonments fit within the master planned rights-of-way given in Table 2 (p45-53)			
38	*	Policy	ADB	Public Hearing Draft	46-51, 111	SWM in ROW	The following streets, with the ROWs proposed, may have difficulties providing adequate stormwater management within the ROW. This does not necessarily require action to change anything in the plan, but inaction should be done with the awareness that SWM might not be fully addressed within the ROW. - p46 - Broschart Rd between Medical Center Dr & Key West Ave - p46 - Diamondback Dr between Key West Ave & Decoverly Dr - p46 - Great Seneca Hwy (MD 119) between Darnestown Rd & Medical Center Dr - p46 - Medical Center Dr between Great Seneca Hwy & Broschart Rd - p46 - Medical Center Dr between Broschart Rd & Medical Center Way - p46 - Medical Center Dr between Medical Center Way & Key West Ave - p47 - Omega Dr between Key West Ave & Research Blvd - p47 - Research Blvd between Omega Dr & Rockville City Limits - p49 - Muddy Branch Rd between West Deer Park Rd & West Diamond Ave (MD 117) - p49, p111 - Shady Grove Rd between Research Blvd & I-270 Offramp - p49, p111 - Shady Grove Rd between I-270 Offramp & 1200' west of Frederick Rd - p50 - Decoverly Dr between Diamondback Dr & Skyhill Way - p51 - Johns Hopkins Dr between Key West Ave & Belward Campus Dr - p51 - Medical Center Dr Extended between Key West Ave & Great Seneca Hwy - p51 - Muddy Branch Rd between Belward Campus Dr Extended & Midsummer Dr			
39	*	Policy	ADB	Public Hearing Draft	46-51, 118	LSC Loop Trail	Ensure that the "LSC Loop Trail" is defined at some point: whether it's some form of separated bike lanes, Sidepath, or something else. For reference, currently the Bike Master Plan shows it mostly as Separated Bike Lanes on each side of the street. But in the cross-sections the LSC Loop Trail takes on the visuals of a Sidepath.			
40	*	Policy	ADB	Public Hearing Draft	46-53	Medians	Consider denoting whether streets are Divided or Undivided. In the past, the standard way to do this has been to label Divided roadways via the Traffic Lanes information, such as 4D or 6D.	3		
41		Policy	ADB	Public Hearing Draft	47-48, 52-53	Identifying Roads	Add a map labelling the unnamed roads, including Roads B, C, E, F, G, I, J, L, M, Q, R, S, T, U, V, W, Y.			
42	*	Policy	ADB	Public Hearing Draft	48	Curbless & Shared Streets	Road E and Road M: Consider changing "Commercial Shared Street" and "Shared Street" both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Commercial Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. Portions of these streets may be more likely to be Curbless Streets rather than Shared, depending on the amount of vehicle loading expected to use these streets. Vehicle loading may be due to garage access associated with adjacent developments (particularly where they may be unable to fit access points onto other fronting streets), and the more vehicles: the less comfort & efficacy a Shared Street will have. 40' will be very narrow for the type these types of streets if motor vehicles are expected to substantially use these streets for access. I'd suggest 50' ROW if we expect these to Curbless Streets (providing vehicle access to buildings) or 44' ROW if we expect these to be Shared Streets (minimal vehicle access).			
43	*	Policy	ADB	Public Hearing Draft	50	ROWs Below Defaults	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p50 - **Corporate Blvd Extended between Omega Dr & Shady Grove Rd** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes*			
44	*	Policy	ADB	Public Hearing Draft	51	ROWs Below Defaults	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p51 - **Molecular Dr between Travilah Rd & Shady Grove Rd** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes*			

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
45	*	**Policy**	**ADB**	**Public Hearing Draft**	**52, 93**	**ROWs Below Minimums Required**	**The following streets propose infrastructure that exceeds the ROW available even if everything is reduce to their CSDG minimums. As written the proposed infrastructure is not attainable within the ROW provided. The plan needs to either call for additional ROW or reduce proposed infrastructure.** **- p52 - Road T between 150' west of Road S & W Diamond Ave - 50' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths, short by 14' to achieve all-minimum width design elements.** **- p93 - Clopper Rd between Longdraft Rd & Great Seneca Creek - 60' Proposed ROW, 108' all default widths, 68' all minimum widths, presuming 15' Street Buffers for an Open Section Road. Short by 8' to achieve all-minimum width design elements, which might be achievable by narrowing the Street Buffers to 11' each, but this would only be agreeable upon completion of accompanying SWM/Drainage analyses.**	1		
46	*	Policy	ADB	Public Hearing Draft	52, 85	ROWs Below Defaults	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p52 - **Road B between Muddy Branch Rd & Darnestown Rd** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p52 - **Road C between Belward Campus Dr Extended & Key West Ave** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p52,85 - **Road S between Muddy Branch Rd & W Diamond Ave** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p52,85 - **Road U between Road S & Road Y** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p52,85 - **Road V between 150' west of Road S & Muddy Branch Rd** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p52,85 - **Road W between 150' west of Road S & Muddy Branch Rd** - 50' Proposed ROW, 80' Default ROW, 84' all default widths, 50' all minimum widths - *Will result in elimination of Frontage Zones & Sidewalk, Street Buffer, and Travel Lanes all at their minimum widths*			
47	*	Policy	ADB	Public Hearing Draft	53, 85	ROWs Below Defaults	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p53,85 - **Road Y between 150' west of Road S & Muddy Branch Rd** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p53 - **Travilah Rd Extended between Darnestown Rd & Key West Ave** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes* - p53 - **Travilah Rd Extended between Key West Ave & Belward Campus Dr** - 75' Proposed ROW, 80' Default ROW, 109' all default widths, 64' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes*			
48	*	Policy	ADB	Public Hearing Draft	53, 85	Curbless & Shared Streets	Road X: Consider changing "Residential Shared Street" and "Shared Street" both to "Curbless or Shared Street", unless the plan deliberately intends to specify otherwise. While "Residential Shared Street" does reflect the parlance currently in the County Code, using "Curbless or Shared Street" would reflect the parlance of the ongoing Planning-MCDOT effort. I'm unsure where Road X is, but in general I'd suggest 50' ROW if we expect these to Curbless Streets (providing vehicle access to buildings) or 44' ROW if we expect these to be Shared Streets (minimal vehicle access).			

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
49		Policy	ADB	Public Hearing Draft	54, 57-61	Frontage Zones	To start with two FYI's regarding Frontage Zones: - In the Code the Frontage Zones has generally been envisioned as part of the Public ROW. - In CSDG the Frontage Zone along Downtown Streets can be reduced to 0'. The cross-section here shows Frontage Zones outside the public ROW. This may result in Frontage Zones being frequently omitted by developments. What's shown is fine if that is considered acceptable by Planning & Council & no action is required. However, if Planning/Council intend to see more Frontage Zones: either additional ROW may be necessary, or narrative toward the provision of Public Improvement Easements (PIEs) may be necessary. (Note that legal concerns have been raised by the County Attorney's Office regarding the efficacy & legality of PIEs.)			
50	*	Policy	ADB	Public Hearing Draft	54-62	Cross-Sections Note	Add a note to each cross-section reading: "Cross-section is diagrammatic only for purposes of showing an approximate envisioned layout within planned rights-of-way. Actual design may vary depending on safety & operational needs as well as site constraints."			
51		Policy	ADB	Public Hearing Draft	55-56, 62	Sidewalk Width	The CSDG Default Sidewalk Width along Downtown Streets, Town Center Boulevards, & Town Center Streets is 10'. The 8' width shown is acceptable (it is the Minimum Width in CSDG), so this is fine if these sidewalk widths are considered acceptable by Planning & Council. However, if Planning/Council intend for Sidewalks to be their Default width: ROWs of at least 54' (p55) or 79' (p56) will be necessary.			
52	*	VZ	WH	Public Hearing Draft	58, 60, 61	2-Way SBLs vs 1-Way SBLs w/ Passing Lanes	Where options provide for two-way cycletracks on both sides of the roadway, consider instead having one-way cycletracks going with the direction of traffic and the 2nd bike lane as a passing lane. This creates a wide buffer with space for faster cyclists to safely pass in the bike lane and avoids having bike traffic coming the opposite direction of car traffic.			
53		**DOT**	**CC**	**Public Hearing Draft**	**58, 60, 61**	**Road Diets**	**The road diets and associated greenways / promenades appears to be proposing to spend large amounts of resources to substantially reconstruct these roads, to little substantive benefit. The area already has large open spaces & they themselves contribute to the large sense of scale that already makes this area feel unwalkable.** **And the very short blocks alongside the loss of capacity will pose substantial operational challengeswith the short blocks being unable to store queues from each intersection. The transportation analysis is insufficient to support these recommendations, and a more detailed analysis would likely find this recommendation to be infeasible to safely implement.** **Consider a more limited approach to Key West and Great Seneca (particularly the former) that can achieve clear goals and benefits with less cost to the public.** **Consider also whether a reconstruction of Darnestown Rd might be able to achieve similar intentions. Darnestown Rd has been envisioned to become more local-serving, carries less traffic, and could knit together the growing areas south of Darnestown Rd which have long been rather separated from the areas to the north.**	1		
54	*	**DTE, Policy**	**MCJ, CVA**	**Public Hearing Draft**	**58, 60, 61**	**Ped Operations**	**The very wide distance between the roadway and Sidewalk also present several operational challenges:** **1) (MCJ) At cross-streets, having the Sidewalk offset by nearly 70' feet (at least 4 car-lengths) from the roadway, it will make intersection design very challenging and will result in the either the Sidewalk having to shift back toward the roadway at every crossing (in which case pedestrians may be likely to walk in the Bikeway), or having unsafe crossings at what will effectively be a separate midblock crossing with no control for vehicles due to the proximity to the existing intersection.** **2) (MCJ) If transit service is present: there is a large distance between any transit stops and where people are expected to walk. This may result in pedestrians walking in the Bikeway.** **3) (CVA) The wide rights-of-way in the plan area today contribute to the poor pedestrian environment, particularly in making destinations feel more distant than they actually are. There is a risk of retaining these issues with these wide corridors.**	1		Thanks for noting this; we share your concerns and would appreciate your ideas for addressing them. 1. I should have noted that everything between the ped/bike buffer and the general purpose travel lanes in the Promenade is open for more detailed design. We'd appreciate your input on designing bike and pedestrian facilities within the open space that balance providing access to the buildings on the north side of the ROW, access to the curb, and safe crossings. One precedent example is Eastern Parkway in Brooklyn, NY; our case would a be a bit simpler since we are not recommending a service road. We're also hoping to activate the promenade area with kiosks, pavilions, paths, and other features. Could pedestrian and bike signals at the crossings of perpendicular north/south streets be coordinated with the signals on Key West? 2. There is existing transit service on Key West Ave and, although we are not currently proposing dedicated transit lanes on Key West, we imagine transit service would continue to be provided. We would envision pedestrian pathways through the promenade area to connect transit stops to adjacent buildings. This would be an improvement over the existing condition where transit

0		Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
55	*	Policy	ADB	Public Hearing Draft	59-61	Fire Access	A building frontage can be a maximum of 50' from a Fire Access. A Fire Access requires a 12' travelway designed to support heavy vehicles, plus an additional 8' flush area for outriggers. The cross-sections on pages 59-61 will require that the Sidewalk & a portion of adjacent areas be designed as a Fire Access route. This does not necessarily require action to resolve, provided Planning & Council are comfortable with Sidewalks being designed to function as Fire Access, and that some amount of additional space will be required for the outrigger areas. This space might come from either the Future Recreation areas, or by requiring at least some amount of Frontage Zone. Fixed objects would be limited within the areas required for outriggers.			Thanks for bringing this to our attention.
56		Policy	ADB	Public Hearing Draft	64	Phrasing	#1 Belward, 1st new bullet on p64: This currently reads: >>> Step new buildings down to 60 to 80 feet depending on whether they are adjacent to the Belward Farm, to be decided at site plan review.<<< Is this meant to read "Step new buildings down to 60 or 80 feet" ?	3		
57	*	Policy	GE	Public Hearing Draft	71, 86-87, 112	Surface Lot Microgrids	(GE) All parking areas above a certain size should consider including a microgrid (or possibly be required to have a microgrid). (SLB) Though consider also that implementing microgrids atop surface lots may discourage or delay their future redevelopment.			
58	****	Policy	ADB	Public Hearing Draft	72	Forest Conservation Areas	**#5 includes the following:** **>>> Protect existing forests to provide carbon sequestration, heat island mitigation, air and water filtration, watershed protection, support of biological diversity, and proven physical and mental health benefits. <<<** **While this is a good goal, generally, in what is intended to be a Downtown area this may pose unintended consequences. There are existing Forest Conservation Areas that block potential infrastructure needs (such as extending Traville Gateway Dr northward to Medical Center Dr). Existing Forest Conservation Areas also create voidspaces which hamper the pedestrian experience by reducing "interesting-ness" of an area & making a segment *feel* very long to traverse.** **The Plan should provide narrative toward Forest Conservation Areas. This section should identify any such areas (perhaps include a map?) and consider whether they should be modified to achieve other plan recommendations.** **Consider whether the Promenades & Greenways may provide commensurate tree coverage for any impacted Forest Conservation Areas, &/or consider creating new Forest Conservation Areas in areas less impactful on infrastructure needs, or in areas internal to sites.**	1		
59	****	Policy	ADB	Public Hearing Draft	74	Biotech Exemptions	**The Implementation section should note that Biotech is not presently required to do follow Local Area Transportation Review (LATR) nor pay impact taxes.** **Given the substantial amount of biotech existing and expected: this could have a substantive effect on plan implementation.**	1		
60	*	Policy	ADB	Public Hearing Draft	75-76	CIP Projects	Need to ensure CIP list reflects all recommendations. I've spotted the following in my read-through which appear to be missing: - New Street Grid roadways (p39, 41) - Enumerate all changing street sections (p42 & upgraded sidepath widths (p40) - Protected Crossings (p41) - Bike Parking Stations a transit stations, trails, parks, public open spaces, large employment / retail centers (p40) - Implement Bike Parking Stations at Bike Plan areas: Belward, Adventist, PSTA (p40,64)			
61		VZ	WH	Public Hearing Draft	75-76	Lead agencies	SHA and MCDOT should be co-leading agencies for right-size intersections; signalize, restrict or close median breaks; consolidate, remove or relocate driveways; and walkways and bikeways network since each agency is responsible for its ROW and they need to collaborate when they intersect.	3		
62		Policy	ADB	Public Hearing Draft	75-76, 88, 95, 100, 106, 113, 120, 123	CIP Page Numbers	Consider adding a column that includes page references to where the project is substantially referenced.			
63		Policy	ADB	Public Hearing Draft	80	Formatting	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 34,35).	3		

0	Team	Commenter	Document	Page	Summary	Comment	Priority	Response	Response Detail
64	Policy	ADB	Public Hearing Draft	83	PEPCO Trail Breezeway	The PEPCO Power Line trail along the north side of the Quince Orchard area is currently designated by the Bike Master Plan as a Breezeway. Given that the Breezeway is named on p91 and p95, I presume this is simply an oversight & this just needs the accompanying line weight to indicate a Breezeway. Just in case: If the Plan is proposing to remove the Breezeway status from the PEPCO Power Line trail, then we strongly urge hesitation & that this be discussed during worksessions. This connection would provide an excellent east-west connection knitting the Upcounty area together & its removal would result in a lower quality product.			
65	Policy	ADB	Public Hearing Draft	83-84	Formatting	Consider aligning the maps across each of these three pages (Figures 36, 37). Consider also whether to crop these graphics to focus on the NIST / Londonderry / Hoyle's Addition area.	3		
66	Policy	ADB	Public Hearing Draft	84	Formatting	Figure 37 - The legend is missing.	3		
67	Policy	ADB	Public Hearing Draft	86	Noise Study / Wall	D, Natural Environment: #1 says to conduct a noise study, and #2 says to construct a noise wall & vegetative barrier. Is #2's recommendation a predetermined result of #1? Or is #2 already affirmed to be necessary, and #1 would be to identify additional needs in addition to the wall/barrier?			
68	Policy	ADB	Public Hearing Draft	92	Formatting	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 39, 40).	3		
69	Policy	ADB	Public Hearing Draft	92-93	New Figures	A reader may not think to find the transportation figures for Quince Orchard located in the NIST / Londonderry / Hoyle's Addition section (p83-84). Consider copying these graphics and adding them between pages 92 and 93. (note also my formatting comments on p83-84)			
70	Policy	ADB	Public Hearing Draft	104	Formatting	Consider putting each map on its own individual page, enlarging it, and aligning them across each of these pages (Figures 44, 45).	3		
71	**Policy**	**ADB**	**Public Hearing Draft**	**107**	**Railway ROW**	**Add the CSX / WMATA Railway as a row to Table 10. This should provide the ROW needs necessary to provide a 3rd track for CSX / Amtrak / MARC, and also to provide bidirectional track for the Red Line Extension proposed by the I-270 Corridor Forward Plan.**	1		
72	Policy	ADB	Public Hearing Draft	109	Formatting	Consider substantially enlarging Figure 46.	3		
73	Policy	ADB	Public Hearing Draft	110	Formatting	Figure 47 and 48 are the same graphic albeit with different legends. Consider some way to make this clearer, or at least enlarge these Figures to make them more legible.	3		
74	Policy	ADB	Public Hearing Draft	111	ROWs Below Defaults	The following streets propose infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p111 - **Gaither Rd between City of Gaithersburg & Shady Grove Rd** - 90' Proposed ROW, 100' Default ROW, 104' all default widths, 70' all minimum widths - *Will result in reducing the 12' total Frontage Zone area to 7' total (averaging 3.5' on each side).* - p111 - **Industrial Dr between Gaither Rd & Gaithersburg City Limit** - 70' Proposed ROW, 80' Default ROW, 82' all default widths, 48' all minimum widths - *May result in either the narrowing of Frontage Zones on one or both sides, or the elimination of parking along one side of Industrial Dr.*			
75	Policy	ADB	Public Hearing Draft	118	ROWs Below Defaults	The following street proposes infrastructure that exceeds the ROW available if everything is at its CSDG Default, but can fit if elements are reduced toward their minimums. These streets are only called out to advise that they will have features beneath CSDG Default; none of these necessarily require action: - p118 - **Decoverly Dr Extended between Fields Rd & 675' West of Washingtonian Blvd** - 75' Proposed ROW, 80' Default ROW, 119' all default widths, 70' all minimum widths - *Will result in elimination of Frontage Zones & reduced width Ped/Bike Buffers or Bike Lanes*			
76	Policy	ADB	Public Hearing Draft	122	Formatting	Built Environment, #2: Change "side path" to "sidepath" to reflect the formal naming in the County Code.	3		
77	**Policy**	**ADB**	**Transportation Appendix**	**14**	**Transpo Analyses**	**The plan does not meet the Travel Time metric directed by Council in December 2020, with estimated travel times for both auto and transit increasing by 1 minute at plan-buildout. This reflects a +6% increase for auto trips and +2% increase for transit trips.** **We do not necessarily oppose increased auto travel times, particularly noting the spirit of the recently approved Thrive Montgomery 2050 update to the General Plan. However, travelers must have options, and reductions in auto access must be paired with improvements in transit access.** **That said, a 1 minute / 2% increase for transit trips is not particularly substantial, and we understand from Planning staff that this reflects a nuance of how the metric is calculated rather than any forecast degradation of service. We defer to Planning and Council for consideration of this issue and whether additional transit infrastructure may be necessary.** **We also note that we have been working with Planning on the development of new master plan metrics which may better identify issues, needs, and actionable recommendations to resolve these sorts of issues.**	1		

DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

Marc Elrich
County Executive

Scott Bruton
Director

MEMORANDUM

February 28, 2024

To: Kara Olsen Salazar, Planning Specialist DGS

CC: Ken Hartman-Espada, Director of Strategic Partnership
Claire Iseli, Special Assistant to the County Executive

VIA: Scott Bruton, Director DHCA

FROM: Somer T. Cross, Chief of Housing STC

Subject: Great Seneca Master Plan: Connecting Life and Science

Pursuant to Sec. 33-A-7 of the Md. Code, the County Executive asked DHCA to analyze the housing recommendations in the Working Draft of the Great Seneca Master Plan: Connecting Life and Science ("Working Draft" or "Plan"). The following is that analysis and some recommended changes to the draft.

Unlike most other Master Plans, the Great Seneca Master Plan evaluates a series of separate areas, not one cohesive area. It is divided into eight (8) individual County areas in and around the city limits of both Gaithersburg and Rockville. Because each section is so unique, the following is a breakdown of the housing considerations in each area. There are no Plan-Wide recommendations related to housing or other elements. Each section is distinct and is treated as such.

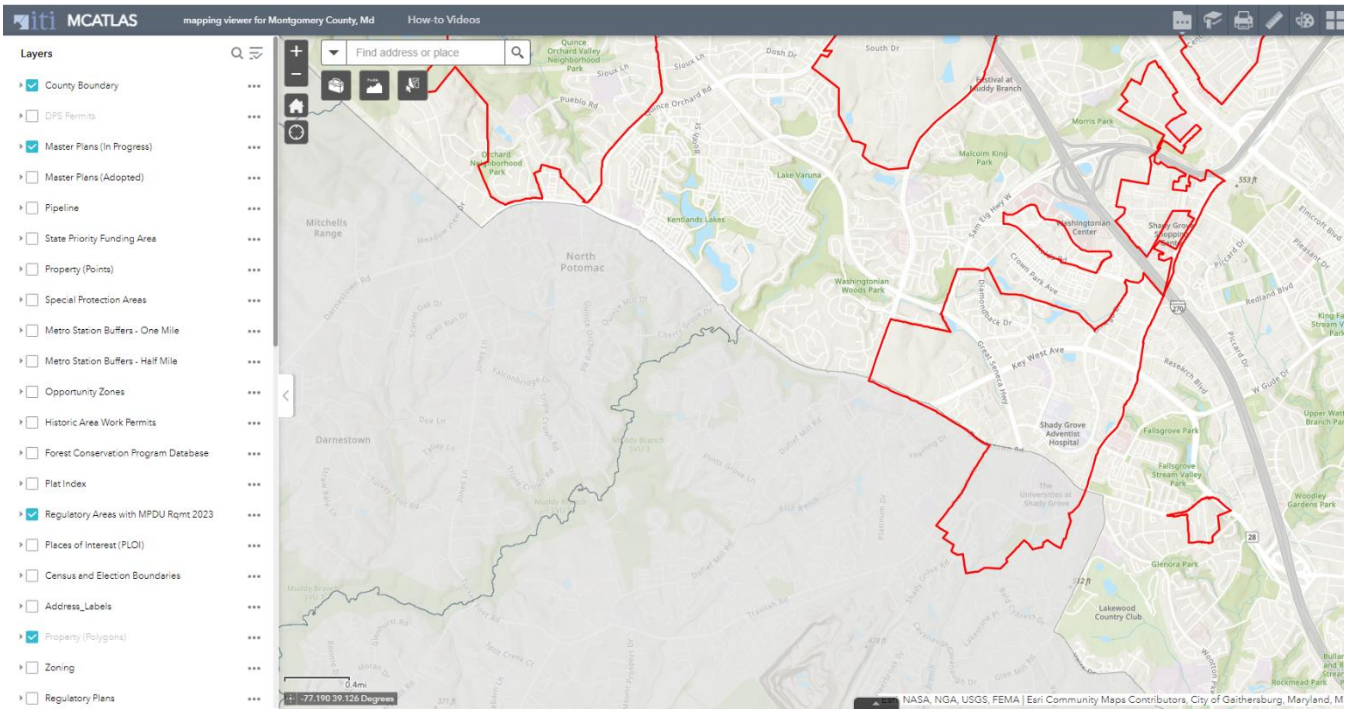
1. **Life Sciences Center**

   This area is in both Rockville and Gaithersburg's maximum expansion areas, though the Plan specifically opposes any annexation of this area to either city (Working Draft, p. 69). At a crossroads between the two cities, the Life Science Center area has little existing residential development. There are smaller areas of townhouse development and some single-use multifamily development. Most of the area is currently some form of mixed-use zoning, but the zoning recommendations are to convert the existing R-60, Residential-Townhouse, and Employment Office zoning portion of the area to Commercial Residential mixed-use zoning. (Working Draft, p. 31) As a result, any new housing will likely have a

rental concentration in this area because there is a strong rental market, and the area continues to experience demand for housing. As this area also provides significant employment and transportation opportunities, DHCA agrees that additional rental housing would be ideal in this area. Other recommendations in the Plan for this area will help make this section of the County more walkable and have a more complete network of bike paths and connectivity.

As of now, the Plan includes the following housing recommendations for this sub-area:

- Require new developments to provide at least 12.5% MPDUs. That recommendation should be modified to require 15% MPDUs. Because the 15% MPDU requirement is mandated in 25A of the Code to be based on census tract income, the current allocation of those areas would split the Life Sciences Center area in half. See map below. If the Planning Area is not being modified to require consistency across the entire section, the Master Plan could recommend that this sector plan sub-area should have a 15% MPDU requirement.



- Encourage nonprofit and religious institutions to expand housing. Though it is not easy to map nonprofit owned properties, there are no religious institutions currently within this area. That recommendation may not be needed in this section.

- Recommend preserving naturally occurring affordable housing where possible. DHCA recommends that the recommendation be given more priority than a goal to achieve. If considering CR point allocations or priorities, preservation of affordable housing should be the primary compliance requirement of the master plan.

- Require 30% MPDUs where public properties are redeveloped with residential uses with 15% affordable at MPDU standards and 15% at 50% of AMI. That requirement would be consistent with other redevelopment of County property. Though there are a few public properties within this area's boundaries, redevelopment of those sites is unlikely.

- Prioritize rental agreements. While individual redevelopers should work with DHCA to consider the possibility of rental agreements for support, rental agreements are subject to County funding and are not guaranteed.

- Prioritize family sized units. This recommendation should be one of many that should be provided across the Plan areas, regardless of location. Encouraging more family-sized units in this area, close to employment and transportation, should be prioritized everywhere that multifamily is allowed.

2. **NIST / Londonderry and Hoyle's Addition**

The Plan calls Londonderry area "an area that has been comparatively disadvantaged in terms of economic development, educational opportunities, environment, and infrastructure." (Working Draft, page 12.) The area is surrounded by major transportation corridors of Muddy Branch Road, West Diamond Avenue and I-270 which effectively isolates the housing units located there. Londonderry has a mix of high- and low- rise apartments and according to the plan, over 90% of residents in this area rent.

The Plan recommends rezoning properties currently designated R-20 to CRT-2.0, C-1.5, R-2.0, H-150 and supports a floating zone for that density recommendation on R-200 properties. Londonderry is already identified as being underserved by parks, which are especially necessary in this area, as it is surrounded by transportation and pollution. The Plan also recommends a noise study for the community, vegetative barrier, and green cover on 35% of the site. With that green coverage requirement, it appears that density potential on the site will more than double.

- The housing recommendations should include requirements, in the event of redevelopment, that additional equity features like that a sound wall and assistance in park creation are provided.

- Recommendations for the Londonderry housing section focus on preservation but could be modified to clarify that retention of affordability should be the ultimate priority. As shown on the following table, there is more than double density potential with the new zoning recommendation. Redevelopment is a viable option for the future of this section.

	Owner	Address	Current Zoning	Proposed Zoning	Average Rent	Number of Bedrooms	AMI Served	Total Units Current	Total Units Proposed Zoning
Londonderry Apartments (09-00767544, 09-00767588, 09-00767577)	Trafalgar Assoc LP	17041 Downing St. Water Street	R-20	CRT 2.0, C-1.5, R-2.0, H-150'	$1701	1 and 2	55%-60% of AMI	150 units	1506 units[1]
Londonderry Towers (09-01876484)	Londonderry Affordable LLS	17060 King James Way	R-20	CRT 2.0, C-1.5, R-2.0, H-150'	$1468	1, 2, 3, and 4 BR	35% - 65% of AMI	531 units	176 units[2]
Montgomery Club Apartments (09-02168350 09-00767555)	Londonderry or Waterbury –	17112 Queen Victoria Ct	R-20	CRT 2.0, C-1.5, R-2.0, H-150'	$1503	1 and 2	40% - 60% of AMI	109 units	499 units[3]
Willows Apartments (garden) (09-00791806)	Willows of Gaithersburg Assoc LP Detrick Ave Kensington	17200 Davis Ave., 17041 Downing St, 429 W Diamond Ave.	R-20	CRT 2.0, C-1.5, R-2.0, H-150'	$1020	1 and 2	30% - 40% of AMI	195 units	420 units[4]
TOTALS								985	2,601

Note, there are other condominium units in the area, which, when combined with the 985 rental units, account for the 1,143 unit count provided in the Plan, page 73. Recommendations for housing provided on page 76 of the Plan are almost identical to the Life Sciences area. As there are no public properties in this area, there is no recommendation for redevelopment of such sites.

[1] 13.35 acres + 6.61 acres + 11.97 acres = 31.93 acres or 1,390,871 sf; Less 35% green cover as recommended in Plan = 904,066 sf
904,066 X 2 =1,808,132 sf of Residential permitted 1,808,132/1,200sf per unit = 1,506 units
[2] 3,74 acres = 162,914 sf; Less 35% green cover as recommended in Plan = 105,894 sf
105,894 X 2 = 211,788 sf of Residential permitted 211,788 / 1,200sf per unit = 176 units
[3] 3.87 ac + 2.12 ac + 4.6 acres = 461,400 sf; Less 35% green cover as recommended in Plan = 299,910
299,910 X 2 = 599,820 sf of Residential permitted 599,820 /1,200 sf per unit = 499 units
[4] 8.9 acres= 387,684 sf; Less 35% green cover as recommended in Plan =251,994
251,994 X 2 =503,989 sf of Residential permitted 503,989/ 1,200 sf per unit = 420 units

3. Quince Orchard

The Plan envisions that this area will remain primarily low-density. This area is not near any center of activity nor is it served by high-quality transit. A large portion of the Quince Orchard area is comprised of Seneca Creek State Park. All single-family residential zones are recommended to be maintained.

One area of employment office zoned land is recommended to convert to residential single-family zoning, R-200. That one property is 2,908,092 sf and prime for single-family development. Density under the R-200 zone is limited to 2.18 units /acre, so the maximum units the property could generate is 145 single-family houses.

The other property with residential redevelopment potential is St Rose of Lima Church at 11701 Clopper Road. Development with housing would comply with the underlying zones, which are proposed to remain R-90 with a TDR overlay. That property is 506,080 square feet. Density under R-90 is limited to 4.84 units / acre so would generate a maximum of 56 units. With the additional TDR overlay, there is the possibility of an increase in density for that property, though that would be determined at preliminary plan.

No recommendations on housing are currently provided for this area. With the capacity to build an additional 200 units in an area with limited housing, there is the possibility of significant housing impact here. As stated in the conclusion section of this memo, this is where a Plan-wide recommendations on housing might be beneficial if these properties were to redevelop.

4. **Rosemont**

   Rosemont is a 100% single-family developed and zoned area surrounded by the City of Gaithersburg. There are no rental properties and no sites that could be redeveloped. The recommendation in the plan is to maintain the current zoning and uses. There is no housing redevelopment potential here. No recommendations are needed.

5. **Oakmont / Walnut Hill**

   This area is prime to be annexed into the City of Gaithersburg. Until that time, the Plan recommends maintaining the same primarily single-family residential zones except a possible CR neighborhood commercial floating zone over the entire area. No housing recommendations are provided in this section.

   There are two (2) places of worship within this area that could request redevelopment review considering new programs and zoning to encourage additional housing development. Kingdom Hall of Jehovah Witnesses located at 609 Paradise Court is the first. Because of the location of the Kingdom Hall, on a pipestem lot, located on cul-de-sac, surrounded by single-family residential properties, it is unlikely to redevelop.

   Unity Christ Church at 111 Central Avenue, however, has redevelopment potential. It is located on a neighborhood connector road, Central Avenue, and is 158,141 sf in R-200 zone with a recommended CR neighborhood floating zone. Density under the R-200 zone is limited to 2.18 units /acre, so the maximum units the property could generate is 7 single-family houses[5]; however, if the CRN 0.5, C-0.5, R-0.25, H-150' floating is applied, the property could generate 31 units[6]. In light of new legislation and County policies to encourage housing redevelopment on property owned by places of worship, this site could be redeveloped in the future. Again, Plan-wide housing recommendations might be beneficial should these properties redevelop.

6. **Washingtonian Light Industrial Park** – This area is developed as almost exclusively industrial with a few pockets of general retail. Though different housing types are limited uses in GR zone, and could be developed, there are no housing recommendations in this section. It can be implied that no recommendation means that no housing should be encouraged in this area. This warehousing and distribution area of the County has its own value to the County's economy; however, if there is the potential for housing development, again, Plan-wide recommendations might be beneficial.

7. **Washingtonian Residential** - Recommendations for Washington Residential would convert one area of existing multifamily zoning to Commercial Residential mixed-use zoning, to be consistent with surrounding zoning. The change provides a higher FAR of residential component than neighboring properties (R-1.25 for the previously multifamily site versus R-1.0 of the neighboring lots). Existing multifamily zoned property is the

[5] 158,141 sf / 43,560 sf per acre =3.63 acres 3.63 acres X 2.18 units per acres = 7 units
[6] 158,141sf X 0.25FAR = 39,535sf 39,535 sf / 1,200 sf per unit = 31 units

Washingtonian Tower condominium with 205 residential units on a lot 291,368.5. With so many individual property owners, it would be difficult to redevelop.

8. **Hi-Wood** – According to the Plan, the area includes approximately 30 single-family detached units constructed in the 1950s and 1960s on parcels zoned R-200. The area is recommended for annexation to the City of Rockville, as it is surrounded by the city. There is little opportunity for consolidation and only few properties have potential for subdivision with maintained R-200 zoning. The largest lots in this area are located on a pipestem lot that is accessed through easements, so would not be ideal redevelopment.

Conclusion:

In reviewing each of the areas of the Plan, there are housing considerations that are in multiple areas. Instead of recommendations specific to each area, which either repeat the same recommendations or do not provide any recommendations where there is a potential for future housing development, it would be better to have an overarching Housing recommendation for the entire Plan.

The Plan should consider a general housing recommendation to cover the few additional areas where there are one or two lots with residential redevelopment potential. Quince Orchard and Oakmont / Walnut Hill, for instance, have a few properties within their area that could be redeveloped. Whether they will, and to what capacity will depend on the interest of the property owner to pursue the redevelopment process.

DHCA recommends that a Plan-wide housing recommendation section be provided to cover all potential redevelopment areas. Alternatively, common development and redevelopment recommendations should be provided for those smaller areas that have potential for more housing construction.

1. Though the Life Sciences area is the only section of the Plan with identified public properties, a recommendation for public acquisition of property could apply across all areas should additional property come under public ownership. The current recommendation on page 33 related to public property could be modified to state:

   > When public properties are developed or redeveloped with a residential component, provide a minimum of 30% MPDUs with 15% affordable to households earning at the standard MPDU level of 65-70% or less of Area Median Income (AMI) and 15% affordable to households at or below 50% of AMI.

2. As stated above, the Life Sciences area does not have any identified religious institutions to expand housing. There are, however, other areas under the Plan where there are places of worship or sites ideal for nonprofits to become involved, that could be ideal for new housing development or redevelopment of some sites. A general recommendation could be provided to consolidate a couple of recommendations that are currently specific to certain areas:

Encourage public, private, nonprofit, philanthropic, and religious institution partners to expand housing affordability in infill and redevelopment. Work with public, private, nonprofit, philanthropic, and religious institution partners to preserve and expand housing affordability in the Master Plan area.

3. Though the primary area of existing naturally occurring affordable housing is in the Londonderry area, similar recommendations should be provided in Life Sciences and Washingtonian areas where there are existing multifamily developments. Priority should be given throughout the whole Plan to require the prioritization of existing naturally occurring affordable housing, striving for no net loss in the event of redevelopment.

   In the event of redevelopment, the priority should be given to existing eligible residents for the units that are under market-affordable rental agreements. Property owners should work with the DHCA and tenants to ensure that eligible residents receive support and assistance to mitigate the impacts of temporary relocation. Preserve existing naturally occurring affordable housing where possible, to obtain no net loss of naturally occurring affordable housing in the event of redevelopment.

4. Prioritize two- and three-bedroom units for residential development projects to provide additional family-sized units. This recommendation should be one of many that should be provided across the Plan areas, regardless of location. Encouraging more family-sized units in this area, close to employment and transportation areas, should be prioritized everywhere that multifamily zoning exists.

5. As discussed above, the Life Science Area should have a consistent MPDU percentage requirement throughout the area. Additionally, if the MPDU requirements are modified in the future, language should be provided to allow for whatever requirement is under the Code at the time of development. DHCA recommends modifying the recommendation to apply throughout the Plan as follows:

   Require new developments to provide at least 12.5% MPDUs, or other MPDU obligation as established by Code, aligned with current county policy, except in the Life Sciences Area which should provide at least 15% MPDUs throughout that section.

DHCA is available to answer any questions.
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Maryland
DEPARTMENT OF PLANNING

March 7, 2024

Jason Sartori, Planning Director
Montgomery County Planning Department
2425 Reedie Drive, Floor 14
Wheaton, MD 20902

Re: Public Hearing Draft Great Seneca Plan
Amendment to Thrive 2050

Dear Director Sartori:

The Maryland Department of Planning (MDP) received the above referenced draft plan scheduled to be heard before the Montgomery County Planning Board on March 14, 2024. We received this draft as part of the plan distribution as stated in your letter dated February 13, 2024, to Secretary Rebecca L. Flora.

MDP recognizes the significant and thoughtful effort that Montgomery County staff, stakeholders, and Greater Seneca residents applied to the development of the draft plan. To aid the staff and community, I have attached a copy of our Checklist of Maryland Code (Land Use Article) – Charter County based on Division II, Section 21-104(a) Required Elements. The table includes links to the Land Use Article that we hope you will find helpful. MDP encourages Montgomery County to use this table as a self-evaluation tool supporting plan development. MDP looks forward to coordinating with the county and/or municipality on any assistance it seeks for plan adoption and implementation.

Sincerely,

Joe Griffiths, AICP, Manager
Local Assistance and Training

cc: Holly Adams, Montgomery County Planning Department
Rosalind Grigsby, Planning and Development Manager, Takoma Park
Joseph Griffiths, Local Assistance and Training Manager, Maryland Department of Planning
Susan Llareus, Planning Supervisor, Maryland Department of Planning

Enclosure: Checklist of Maryland Comprehensive Plan Code Requirements

Maryland Department of Planning
Public Hearing Draft Greater Seneca _ Connecting Life and Science Plan
Amendment to Thrive Montgomery County 2050
Winter 2024

Maryland's Land Use Article Sections 1-406(a) and (b) require the inclusion of certain elements within the general plan. The following checklist provides for each required plan elements for a Charter County and the Maryland Code reference. This check list is intended to provide assistance to determine consistency with the Land Use Article.

Checklist of Maryland Code (Land Use Article)-Charter County Division I, Title 1, Subtitle 4 Required Elements Division II, Section 21-104(a) Required elements.		
State Comprehensive Plan Requirements	MD Code Reference and Additional MD Code Reference	
(1) The planning commission for a charter county **shall** include in the comprehensive or general plan the visions under § 1-201 of this title and the following elements:	L.U. § 1-406 (a)	
(i) a development regulations element	L.U. § 1-406 (a) (1) (i) L.U. § 1-407 -- Development Regulations Element	
(ii) a housing element*	L.U. § 1-406 (a) (1) (ii) L.U. § 1-407.1 -- Housing Element	
(iii) a sensitive areas element	L.U. § 1-406 (a) (1) (iii) L.U. § 1-408 -- Sensitive Areas Element	
(iv) a transportation element	L.U. § 1-406 (a) (1) (iv) L.U. § 1-409 -- Transportation Element	
(v) a water resources element	L.U. § 1-406 (a) (1) (v) L.U. § 1-410 -- Water Resources Element	
(2) a mineral resources element, IF current geological information is available	L.U. § 1-406 (a) (2) L.U. § 1-411 -- Mineral Resources Element	
(b) A comprehensive plan for a charter county **MAY** include a priority preservation area (PPA) element	L.U. § 1-406 (b) For PPA Requirements, see § 2-518 of the Agriculture Article	
(4) Visions -- A county **SHALL** through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	L.U. § 1-414 L.U. § 1-201 -- Visions	
(5) Growth Tiers -- If a county has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the county's comprehensive plan	L.U. § 1-509	

*Please note that the if SB0274 Charter Counties - Comprehensive Plans - Affirmatively Furthering Fair Housing (AFFH) passes with an effective date of October 1, 2024, considerations of AFFH should be included in the housing elements of new master plans and small area plans after that date

HISTORIC PRESERVATION COMMISSION

Marc Elrich
County Executive

Robert K. Sutton
Chair

March 10, 2024

Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Dear Chair Harris and Members of the Planning Board,

On March 6, 2024, the Historic Preservation Commission (HPC) received a briefing from Planning Department's Midcounty and Historic Preservation Office staff on the *Great Seneca Plan*. The HPC regularly provides comments to the Planning Board on master plan updates which impact historic resources, recommend resources for designation, or include significant historical elements. As part of the HPC's role and responsibilities under Chapter 24A of the Montgomery County Code, I am pleased to offer the Commission's recommendations to the Planning Board.

The HPC is supportive of this Plan and finds that it does not conflict with the preservation of the area's existing character. The Belward Farm, a designated Master Plan Historic Site, is the historic property which will be most impacted by the Life Sciences Center-centric plan elements. Staff have reiterated preservation goals from previous planning efforts for this property.These robust recommendations will preserve the integrity of the site, and provide opportunities for the public to continue to enjoy the hallmark farming context central to the area's history. In addition, the historic context and Historic Preservation Appendix in the Plan provide an updated and inclusive framework for understanding the history of the plan area.

We look forward to working with you as this Plan progresses and are available for any questions during the public hearing and worksessions.

Sincerely,

Robert K. Sutton, Chair
Historic Preservation Commission

Cc: Members, Historic Preservation Commission

Montgomery County's Advocates for Better Transportation

P.O. Box 7074, Silver Spring MD 20907 ● admin@actfortransit.org

February 18, 2024

Dear Chair and Members of the Montgomery County Planning Board:

On behalf of the Action Committee for Transit, I am writing to express our organization's support for the Great Seneca Plan: Connecting Life and Science ("the Plan"). The Plan envisions transforming the area into a walkable, bikeable, vibrant science center with a mixture of uses served by transit, as well as an array of services and amenities for residents, workers, and visitors. Although pleasant and walkable neighborhoods exist within and adjacent to the Plan's borders, these neighborhoods are mostly disjointed; many of the roads that connect them are hostile for walking, biking, or riding the bus, even though they are within walking/biking distance from one another. As a result, people who live in this area often drive for trips that could be taken by foot, bike, or bus.

Personally, as someone who has lived in three neighborhoods in this area (Quince Orchard, Decoverly, and Fallsgrove) and as someone who has lived in two of these neighborhoods while not owning a car, I am excited for a complete network of comfortable walkways and bikeways, connected by safe, protected crossings and separated bike lanes. I was also particularly excited to learn about how the Great Seneca Transit Network will greatly benefit the area through more transit service and the addition of dedicated transit lanes, resulting in better connectivity within the area and to the Metro.

With great enthusiasm and in memory of Paul Shinn, who was killed while crossing the Life Sciences Center's Medical Center Way at Medical Center Drive on foot in 2022, as well as my friend Codi Alexander, who was killed while crossing Sam Eig at Great Seneca on her bike in 2009, I strongly support implementing the Great Seneca Plan: Connecting Life and Science, without delay.

Sincerely,

Amy Frieder
President, Action Committee for Transit

Françoise M. Carrier, Of Counsel (MD DC CA)
fcarrier@bregmanlaw.com

BBS&G Attorneys
Bregman, Berbert, Schwartz & Gilday, LLC

T: 301-656-2707 F: 301-961-6525

March 5, 2024

Artie Harris, Chair, and Members,
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Re: Great Seneca Plan

Dear Chair Harris and Members of the Board:

I am writing on behalf of my client, Guardian Realty Management, Inc. ("Guardian"), to provide input on the Great Seneca Plan (the "Plan"). A Guardian affiliate owns property located at 15200 Shady Grove Road (the "Property"), within the area covered by the Plan. Guardian has been communicating with planning staff about its plans for the Property and applauds their willingness to engage in an ongoing dialogue as they developed the draft plan. Guardian is generally pleased with the recommendations in the Working Draft of the Plan as they relate to the Property, including zoning, height and density. Guardian has three concerns at this point, which are outlined below.

1. Road Recommended Immediately West of Property

The Property's surface parking lot abuts a grassy open space that is part of the neighboring property to the west, known as the Mallory Square Apartments. Please see aerial image below.

The Working Draft proposes that this grassy area, which was dedicated as a street some years ago but never built, should become a vehicular roadway. Guardian requests that, instead, the Plan recommend maintaining this grassy area as public open space, with the addition of a pedestrian/bicycle path. If a road is built in this location, it could become a cut-through for drivers seeking to avoid traffic lights on larger nearby roads. Bringing high levels of rush hour traffic, potentially moving at high speed, through this narrow stretch of land would be detrimental to the existing Mallory Square Apartments -- which has apartments facing onto the grassy area -- and to Guardian's future redevelopment of the Property. It would turn an amenity into a commuter road. In addition, cut-through traffic could make it very difficult to get in and out of the Property during rush hour. Guardian hopes to activate the grassy open space, perhaps by including retail on the ground floor of a future redevelopment project. An additional, activated public open space, somewhat sheltered in between two buildings, could be a welcome extension of the pedestrian promenade that the Working Draft proposes along Key West Avenue. This contribution to the pedestrian realm would have greater value for area businesses and residents than a tiny stretch of road that would contribute little to the local transportation network.

The Working Draft shows the road proposed through this grassy area connecting to another proposed road, on the north side of Research Boulevard, on a property known as The Grove. The road proposed at The Grove would go right through a large parking garage and other structures. Guardian is very familiar with The Grove and considers it extremely unlikely that this garage will be torn down within the lifetime of the Plan. In addition to commercial elements of The Grove, the garage serves an adjoining multi-family building that has legal rights to a large number of the parking spaces. This would make removing the garage during the life of the multi-family building difficult and costly. If the Planning Board decides to leave these two road recommendations in the Plan – the one through the grassy area and the one through existing buildings at The Grove – Guardian requests a note in the Plan specifying that construction of the road through the grassy area should not be required in connection with adjacent or nearby development unless redevelopment plans have been approved (or at least submitted) for the confronting property across Research Boulevard.

2. <u>Public Improvement Requirements for Guardian Property</u>

The Property has road frontage on Research Boulevard to the north and Shady Grove Road to the east. To the south, it is separated from Key West Avenue by a small, narrow property under separate ownership. The Working Draft recommends that any redevelopment of the Property be responsible for frontage improvements along both road frontages and, in addition, a contribution to the pedestrian promenade proposed along Key West Avenue. The cost of two sets of frontage improvements and a contribution to the Key West Avenue promenade would likely be a heavy burden for the Property. At 2.8 acres, it is one of the smaller properties in the portion of the Plan area called the Life Sciences Center. Guardian should not have to bear an unreasonable cost for public improvements because its small property has two road frontages and is very close to a third major road. If this very specific recommendation stays in the Plan as written, then Guardian submits a redevelopment application for the Property, development review staff are likely to feel obligated to require exactly what the Plan calls for. It is important for the Plan to leave room for flexibility during the development review process about what requirements will be

placed on the project. Guardian requests a modification to clarify that installation of frontage improvements on both road frontages and a contribution to the Key West promenade are desirable, but should be required only to the extent that their cost will be proportionate to the impact of the proposed development on the surrounding area. This will keep public improvement requirements for the Property in line with constitutional standards.

While Guardian does not have frontage on Key West Avenue, it is concerned about some of the practicalities associated with the Working Draft's proposal to repurpose two lanes of Key West Boulevard for a pedestrian promenade. The Working Draft recommends formal abandonment of the County's right-of-way over these two lanes, which requires a lengthy process (minimum one year and often longer) including a public hearing before a hearing examiner, recommendations from the Planning Board and the County Executive, and a final decision by the County Council. Setting aside potential traffic implications, the Plan should specify that the Planning Board or another county entity (perhaps the Department of Transportation) will request abandonment of the two lanes along the operative portion of Key West Avenue. This will avoid holding up development of individual properties with a process whose outcome and timelines are uncertain – a serious disincentive to pursuing a development project. In addition, a single abandonment request for the entire desired length of Key West Avenue would present the County Council with a workable abandonment proposal to consider, rather than piecemeal abandonment requests that would be very difficult to approve.

3. Expanded Uses in CR Zone Portion of Life Sciences Area

The Working Draft recommends an overlay zone that would allow "life sciences" throughout the Life Sciences Center area of the Plan. Guardian welcomes this added flexibility. Guardian requests that the overlay zone specifically permit the "Animal Research Facility" use, which currently is permitted only in the LSC zone. It is a use that many businesses engaged in research and development may need to incorporate in their operations at a small scale. A use that is integral to research in many scientific fields should be permitted wherever the County wishes to encourage biotech-related development, including throughout the Life Sciences Center area of the Plan.

Thank you for taking these suggestions into consideration. Guardian looks forward to working with you on the completion of this Plan and contributing to implementation of the exciting opportunities it presents.

Sincerely yours,

BREGMAN, BERBERT, SCHWARTZ & GILDAY, LLC

By: _____
Françoise M. Carrier

cc: Maren Hill, Great Seneca Plan team leader
Brian Lang, Guardian

ALEXANDRIA®

Great Seneca Plan Public Hearing Draft

Testimony of William DePippo
Alexandria Real Estate Equities
March 14, 2024

My name is William DePippo and I am the Senior Vice President for Alexandria Real Estate Equity's Mid-Atlantic region. As you are aware, ARE is very active in implementing our real estate model, in which we own, operate and develop collaborative life sciences campuses, in Montgomery County, and in particular the Life Sciences Center. Since 2019, ARE has developed almost 1 million square feet of biotech and lab uses in the County and is poised to add to its aggregate total of 1.6 million square feet in the coming years. We applaud your efforts to facilitate this growth in the Great Seneca Plan by lifting the current density cap that had previously been imposed on the Plan area. The effort to create new development opportunities within publically owned land is also laudable.

That said, other aspects of the Plan are concerning and/or do not facilitate the growth of life science uses in core area of the Life Science Center. For example, the Plan seeks to encourage generally the implementation of new housing and mix of uses in the Life Sciences Center. While we understand this aspirational goal, the Plan needs to be very clear about the desired location(s) for housing opportunities for the benefit of life science investors, who would want this certainty.

Similarly, the Plan's recommendations for urban-style connectivity, including new streets and alleys, require immense operational coordination and multi-agency approvals that are not considered during master plan reviews. We otherwise fear that the added duration/coordination required will add time to the regulatory approval processes and create unpredictability in the fast past world of life science development. ARE advocates, as a clear alternative, for strong pedestrian connections between campus clusters to facilitate biotech growth.

Submitted with this testimony is a technical commentary of Plan issues that should be addressed or clarified as the Great Seneca Plan evolves. We look forward to discussing these issues with you and your Planning Staff in the coming weeks.

Thank you for the opportunity to share with you our thoughts on the Plan.

Page	Section	Draft Statement	Question
3	Introduction	Clarify "…….incentivizes production of affordable and market rate housing" in contrast with "Require new developments to provide at least 12.5% Moderately Priced Dwelling Units (MPDUs), aligned with current county policy, unless applying the density bonus provisions of the Life Sciences Center Overlay Zone." - found on page 33.	
27	Context and Vision - Built Environment	Reference to Figure 8 on page 29. This figure contains many inaccuracies on existing uses.	All R&D and residential uses not accurately shown.
27		Reference to Figure 8 on page 29. This figure illustrates mixed use overlayed over many existing R&D properties.	Please define the intent.
27		Clarify / define the intent of "…….facilitate continued growth ……through compact, mixed use development."	Please define "mixed use" for LSC
27		The Life Science Center……."This style of development not only contributes to an inactive public realm, it threatens the economic competitiveness of the county."	Clarify. Page 23 indicated that this was the "premier location for the life science and biohealth industries." How might it threaten the county?
27		The plan seeks to support 15 minute living for as many people as possible by establishing a complete community.	Are the residential communities that surround LSC on all sides considered to support the 15 minute living?
28	Land Use, Zoning, and Urban Design Recommendation	Establish a Life Sciences Center Overlay Zone for the entire Life Sciences Center area, including all parcels shown in Figure 10, that supports mixed-use life sciences development, incentivizes production of affordable and market-rate housing	Does the proposal mandate housing on new or redeveloped properties?
28		Encourage compact, mixed-use development near transit that integrates and connects life sciences uses with residential uses, retail, and neighborhood services and amenities	Does the proposal mandate housing on new or redeveloped properties?
33	Housing Recommendation	This Plan seeks to increase the number of housing units available by integrating housing with life science and medical uses.	Is the County proposing housing on properties that are primarily life sciences?

33		Require new developments to provide at least 12.5% Moderately Priced Dwelling Units (MPDUs), aligned with current county policy, unless applying the density bonus provisions of the Life Sciences Center Overlay Zone	Is the County proposing housing on properties that are primarily life sciences? Does "new development" include "redevelopment"?
35	Transportation Recommendations	Change street names to reflect reinvisioned character and new classification, including Great Seneca Highway and Key West Avenue.	Please clarify why this is important as it impacts cost to street signs, ownership entities, etc.
35		Signalize, restrict, or close median breaks on Key West Avenue, Shady Grove Road, Darnestown Road, and Great Seneca Highway.	Please clarify that public input will be sought as it affects nearby properties.
35		Consolidate, remove, or relocate driveways from designated downtown boulevards, town center boulevards, and boulevards to other side streets and alleys, and limit future driveways	New additional limits on driveways may place undo hardships on successful development.
35		Build out a network of alleys in the downtown and town center area types to support loading and site access	This is totally impractical in the LSC with severe unknown impacts. Further refinement is required. We oppose this measure.
36		Implement a complete network of comfortable walkways and bikeways, connected by safe, protected crossings	Proposed networks cross many existing developed private properties, are impractical to execute and violate existing development rights.
59	Opportunity Sites - Traville Parcel	"…….this Plan imagines that future development could add a mixed-use component to the open campus	The plans have been submitted to the County without mixed-use.
59		"These publicly owned sites…….the Plan recommends evaluating the feasibility of relocating these uses and exploring opportunities for mixed-use that includes life sciences, residential, and retail uses, along with improved connectivity, public open space, and community facilities.	Critically important recommendation to increase the density of this "premier location."
66	Environmental Quality and Preservation Recommendations	On private property, provide a minimum of 35% green cover of the total site, excluding existing forest cover on the property.	Oppose any increase in current green space regulations.

68		The lack of housing options is a barrier to attracting and retaining employees for many businesses and institutions in the Life Sciences Center	Disagree - the LSC is surrounded by residential districts. Please provide data to support the need for more housing in the LSC so we can properly advise and/or comment.
69		Establish a Life Sciences Overlay Zone that supports mixed-use life sciences development, incentivizes production of affordable and market-rate housing	Overlays do not need to include residential.
69		Advocate for, directly fund, or apply for grants for key capital projects in the LSC.	Direct funding to relocate the State and County owned properties should be a high priority.

MONTGOMERY COUNTY PLANNING BOARD PUBLIC HEARING
CONCERNING THE GREAT SENECA PLAN: CONNECTING LIFE AND SCIENCE

Testimony of Eric Fischer on Behalf of Trammell Crow Company

March 14, 2024

Good evening. For the record, I am Eric Fischer, Managing Director with Trammell Crow Company ("TCC"). This testimony summarizes the oral remarks that I will deliver to the Montgomery County Planning Board on March 14, 2024, concerning the public hearing draft of the Great Seneca Plan: Connecting Life and Science (the "Master Plan").

TCC is the ground lessee of approximately 66.5 acres of land located in the northern portion of The Johns Hopkins University Belward Research Campus (the "Belward Campus"), in the Life Sciences Center planning area of the Master Plan. The Planning Board recently approved a Site Plan for our property in 2023 ("Site Plan No. 820220250"), which allows for the future development of the TCC portion of the Belward Campus with up to 751,000 square feet of research and development, biotechnology offices, and laboratory uses, up to 6,000 square feet for retail use, and related amenities and infrastructure including the northern portion of future Muddy Branch Park and a connecting segment of Belward Campus Drive.

TCC supports the proposed Master Plan, and we appreciate the Montgomery County Planning Department's efforts to work with community stakeholders to develop a comprehensive set of recommendations that will amend the existing 2010 Great Seneca Science Corridor Plan and guide development in the overall Master Plan area – including within Belward Campus – for the foreseeable future. The Master Plan appropriately reaffirms the Life Sciences Center as a vibrant life sciences hub that will feature a range of land uses, transportation options, and amenities. Based on our experiences with potential tenants in this market, we believe that the delivery of amenities to serve the Master Plan area (and particularly properties in proximity to the I-270 corridor) will be particularly important for attracting the kinds of quality employers to the Life Sciences Center that are needed to achieve this vision.

TCC also supports the specific recommendations submitted by our landlord, The Johns Hopkins University ("JHU"), through the letter submitted by their land use counsel on March 12, 2024. Among other things, these recommendations support the following: (i) modifying applicable zoning regulations to broaden the range of land uses that are permitted in the Life Sciences Center; (ii) removing the development staging requirements for the Master Plan area that apply through the currently applicable master plan; (iii) including Belward Campus within an expanded red transportation policy area, based on the significant transportation improvements that will be

created on-site pursuant to the development approvals for the property; (iv) ensuring that any new Master Plan recommendations for expanded green cover or parking lot tree canopy include appropriate legacy provisions for large sites such as Belward Campus that are subject to existing development approvals; and (v) ensuring that on-site forest cover may be included within any green cover calculations to address Master Plan goals.

With respect to broadening the range of land uses that may be permitted on Life Sciences Center properties, we believe that supporting increased flexibility to allow for uses that are ancillary to the biotechnology market – such as office, warehousing, or interim surface parking uses, for example, in addition to residential – would be a beneficial change. As you know, the biotechnology industry is ever-evolving, and is inherently subject to market and product cycles that give rise to different needs at different moments in time. By supporting a more robust range of land uses to facilitate life sciences operations as well as associated revisions to the Zoning Ordinance, the Master Plan can help ensure that it will be able to adapt to changing market conditions over its duration, and that it will be sufficiently flexible to accommodate the needs of prospective employers as they come forward with specific intentions for the site.

For similar reasons, to the extent practicable, we respectfully note that the Master Plan also should support the development and implementation of swifter administrative processes to facilitate land use entitlements in the Life Sciences Center. While certain recent amendments to the Zoning Ordinance potentially are helpful in this regard (such as the recent initiatives for the review of Biohealth Priority Campus Plans), our discussions with prospective pharmaceutical and life sciences employers suggest that Montgomery County should do more to address the myriad of challenges associated with locating in this market. By supporting the concept of fast track approval processes similar to those enacted recently in States like North Carolina and Pennsylvania, the Master Plan could help facilitate regulatory changes that are needed to ensure that the County remains economically competitive and that its vision for the Life Sciences Center is able to be fulfilled.

Based on our technical review, we also suggest that additional clarifications be made to certain recommendations in the plan to provide dedicated transit lanes through Belward Campus for the "Great Seneca Connector" described in the 2022 Corridor Forward: The I-270 Transit Plan. More specifically, the Master Plan should note that such dedicated transit lanes will be provided within the approved cross section for Belward Campus Drive as shown on TCC's Certified Site Plan, either within the 50' median or on the road. This would make it clearer that additional dedications of right-of-way are not be needed to accommodate this alignment per our approved plan, and we are providing suggested revisions as an addendum to this testimony.

We thank you for your consideration of these comments and look forward to continued progress on the Master Plan. Should additional input be useful, please do not hesitate to let us know.

ADDENDUM: PROPOSED REVISIONS

Master Plan Public Hearing Draft, at Page 40:

* * * *

13. Provide dedicated transit lanes for the Corridor Connectors identified in Corridor Forward: the I-270 Transit Plan, as shown in Figure 20. For the Great Seneca Connector, this Plan recommends proceeding with the alignment that includes dedicated bus lanes on Medical Center Drive through the former Public Safety Training Academy (The Elms at PSTA) and the **within the approved cross-sections for the** Belward properties **(either within the 50' median or on the road)** to Muddy Branch Road.

* * * *

Master Plan Public Hearing Draft, at Page 63:

* * * *

Belward Campus has a long-standing preliminary plan as well as two approved site plans . . . This Plan recommends supporting the Corridor Connector alignment that includes dedicated bus lanes through the property **within its approved cross-sections (either within the 50' median or on the road)** to Muddy Branch Road . . .

* * * *

WIRE GILL LLP

Heather Dlhopolsky
hdlhopolsky@wiregill.com
301-263-6275

March 12, 2024

Via Email (MCP-Chair@mncppc-mc.org)
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: Comments on Public Hearing Draft of Great Seneca Plan, for March 14, 2024 Planning Board Public Hearing

Dear Chairman Harris and Members of the Planning Board:

On behalf of B9 Sequoia Grove Owner LLC ("Owner"), we are submitting this letter with our comments on the Public Hearing Draft of the Great Seneca Plan (the "Draft Plan"), for the Montgomery County Planning Board's (the "Planning Board") consideration at its public hearing on March 14, 2024. The Owner owns five properties[1], totaling approximately 25 acres, which represents a portion of the block bounded by I-270 to the north, Omega Drive to the west, Research Boulevard to the south, and Shady Grove Road to the east. The properties are located in the plan area identified as The Life Sciences Center.

The Owner is supportive of the overall goals and themes of the Draft Plan, with additional housing options and public amenities such as open space and walking and bicycling options in order to develop this into a "complete community." The Owner also agrees with the general vision expressed for the Proposed "Grove" in the Opportunity Sites section (page 65, #6). However, the Draft Plan's park and public open space and new street recommendations ask too much of the Owner's properties for them to seek any redevelopment at this time.

The Draft Plan (page 30, Figure 11) locates a new park or public open space right in the middle of two of their sites (9201 and 15304 Corporate Boulevard). While the diagram does not have a scale, attempting to scale it using the online Montgomery County zoning map, this park appears to be approximately 1.5 acres (6% of the Owner's property).

Corporate Boulevard is then proposed to be extended through their properties, to a right-of-way of 75 feet, including two vehicular travel lanes and bicycle lanes on each side. The length of this would be approximately 1,000 feet from Omega Drive to Shady Grove Road, again the vast majority of it through the Owner's properties (pages 41-44, 50, 56). Because the Owner owns the sites on either side of the extension, they would be responsible for implementing the full right-of-way section, rather than just the portion along their frontage as is more common. This would require dedication of approximately 75,000 square feet (7%) of the Owner's land. We also note that it is improbable that Corporate Boulevard would make it all the way west to connect with

[1] Specifically, 9201 Corporate Boulevard, 9211 Corporate Boulevard, 15300 Corporate Boulevard, 15304 Corporate Boulevard, and 2611 Research Boulevard.

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Omega Drive, as there is a small intervening portion of the proposed right-of-way owned by property directly to the south which fairly recently redeveloped, and it seems unlikely that they would give up this land. We further note that if Corporate Boulevard did extend all the way to Omega Drive, it renders the southwest corner of the Owner's 15304 Corporate Boulevard site essentially undevelopable by cutting it off from the rest of the property.

Because the Owner's properties front on Omega Drive, Research Boulevard, and Shady Grove Road, should they redevelop each of those frontages would need to be improved to the standards identified in the Draft Plan. For Omega Drive, this means dedication along their frontage to achieve the ultimate 90-foot right-of-way, including a two-way separated bike lane along their frontage (pages 43, 44, 51). On Research Boulevard, the ultimate right-of-way is 110 feet, including two dedicated transit lanes and a one-way separated bike lane along their frontage (pages 43, 44, 47, 54). Along Shady Grove Road, they would need to dedicate land to achieve the ultimate 150-foot right-of-way, including two dedicated transit lanes and a sidepath along their frontage (pages 43, 44, 49).

While the Owner owns a significant amount of property in this block, collectively the recommendations cited above likely result in at least 4-5 acres, approximately 16-20%, of their property either being dedicated to streets or park, or rendered effectively unusable by such recommendations. This is too much burden to place on any group of properties, and thus it is unlikely these properties will redevelop any time soon if the Draft Plan's recommendations hold.

The size and location identified for parks and public open space, as shown on Figure 11, "Conceptual Diagram of the Life Sciences Center as a Complete Community" (page 30), is problematic for several reasons. First, the vast majority of it is located on the 15304 Corporate Boulevard property, and the denoted size far exceeds the maximum 10% public use space requirement imposed by the CR Zone should that site redevelop. Second, while the Owner understands from its meeting with Staff of the Maryland-National Capital Park and Planning Commission ("M-NCPPC") on February 13, 2024 that Staff envisioned that the total public open space requirements for the Owner's properties would be concentrated in the one noted space rather than dispersed through each of their five sites, that assumes that all of the Owner's properties redevelop at the same time. At this time it is unrealistic to make this assumption.

Because one of the legal findings that must be made for approval of a Sketch Plan, Preliminary Plan of Subdivision, or Site Plan is "substantial conformance" with the applicable Sector Plan, retaining this diagram in its current form is problematic. Thus, we respectfully request that the Planning Board direct revision to Figure 11 to note that it is for illustrative purposes only and does not dictate the size or location in which park or public open space is required to be provided, which is instead to be determined as part of review of any development applications to be submitted to M-NCPPC.

Lastly, while the proposed rezoning recommendations for the properties (page 36, Map Number 5) retain the current zoned density on the sites, they increase the maximum height from 100 feet to 150 feet. Based on this recommendation and the Owner's discussion with M-NCPPC Staff on February 13th, we understand that Staff is hoping for and anticipating high-rise development on

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the sites. As we explained in our meeting with Staff, given present-day economics, including construction costs and rental rates, these sites are not likely to redevelop as high-rise or even mid-rise rental. At this time for-sale townhome development is the most likely path forward, and we mention this for two reasons. First, because it underscores the extreme burden that the park and public open space and street recommendations place on the sites, and second, because we understand that there will be a Life Sciences Center Overlay Zone created and imposed on the area following approval of the Plan, it is vital that that Overlay Zone not impose minimum density requirements on the subject properties. Minimum density requirements would not guarantee dense, high-rise development, but would instead limit or prevent any redevelopment at this site.

The Owner is supportive of the broad overarching goals and themes proposed by the Draft Plan, but we have numerous concerns regarding the specifics as discussed above, and we thank you for your consideration of these concerns. Please do not hesitate to contact us should you have any questions or require any additional information.

Sincerely,

Wire Gill LLP

Heather Dlhopolsky

cc: Maren Hill, M-NCPPC
Jessica McVary, M-NCPPC
Luis Estrada, M-NCPPC
Alex Rixey, M-NCPPC

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March 12, 2024

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Artie Harris, Chair and
Commissioners of the Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
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Re: The Great Seneca Plan Public Hearing Draft

Dear Chair Harris and Commissioners:

Our firm represents Johns Hopkins University ("JHU") and we write this letter on JHU's behalf to provide comments on the public hearing draft of the Great Seneca Plan: Connecting Life and Science (the "Public Hearing Draft") as a comprehensive amendment of the 2010 Great Seneca Science Corridor Plan (the "2010 Plan"). JHU is the owner of the approximately 107-acre property commonly known as The Johns Hopkins University Belward Research Campus (the "Belward Campus"), which is currently subject to the recommendations of the 2010 Plan. JHU agrees with the vision expressed in the Public Hearing Draft to establish a dynamic life sciences hub in the Life Sciences Center planning area that is thoughtfully integrated with a range of land uses, transportation options, and attractive amenities. JHU submits the following suggestions for the Public Hearing Draft in support of this important goal.

Land Use, Zoning, and Urban Design Recommendations

JHU shares the objective of supporting infill, compact, and mixed-use development within the Life Sciences Center planning area. *See* Public Hearing Draft, pgs. 31-32. Thus, JHU supports modifying zoning regulations to allow additional opportunities to increase housing, retail, and other complementary uses near existing and future life science uses. *See* Public Hearing Draft, pgs. 32, 37. Specifically, JHU strongly supports "mak[ing] it easier to infill housing with healthcare and/or life sciences by providing flexibility and incentives." *See* Public Hearing Draft, pg. 38. JHU also agrees with the "research and development" designation as the proposed land use for the Belward Campus, as well as with the recommendation to rezone the Belward Campus from LSC-1.0 H-150 T to LSC-1.0 H-150 to confirm the translation from the pre-2014 Zoning Ordinance and zoning map. *See* Public Hearing Draft, pgs. 33-36.

Transportation Recommendations

The Public Hearing Draft seeks to improve transportation in the Life Sciences Center planning area across a variety of modes (driving, transit, walking, cycling, and rolling) and establish a finer grain network of streets. *See* Public Hearing Draft, pgs. 38-39. JHU believes these goals are advanced in the previously approved development applications for the Belward Campus (Preliminary Plan No. 11996110A, Site Plan No. 820210120, and Site Plan No. 820220250). The Belward Campus will be developed with a new roadway grid incorporating significant pedestrian improvements (such as buffered sidewalks and the Darnestown Promenade), new bicycle infrastructure (including side paths, separated bicycle lanes, protected intersections, and a bicycle parking station), accommodations for a new transitway with dedicated lanes (for the future Life Sciences Connector/Great Seneca Transit Network), and new parks (such as the Muddy Branch Park). Based on these characteristics, JHU proposes the Belward Campus be included in the creation/ expansion of a red transportation policy area recommended in the Public Hearing Draft. *See* Public Hearing Draft, pg. 39, Item 6.

Opportunity Sites

The Public Hearing Draft properly identifies the Belward Campus as an "Opportunity Site" with "the potential to accommodate infill development or redevelopment near planned transit, as well as to deliver public benefits, including parks, public open space, streets, and sustainable design." *See* Public Hearing Draft, pg. 63. JHU appreciates the Public Hearing Draft's recognition of the Belward Campus' "long-standing preliminary plan as well as two approved site plans." *See* Public Hearing Draft, pg. 63. Consistent with this recognition, JHU proposes the following edit in the Belward Opportunity Site discussion (with new language in underline): "This Plan retains many of the recommendations from the 2010 Plan and supports implementation of the approved preliminary plan and site plans."). *See* Public Hearing Draft, pg. 63.

JHU also recognizes the specific recommendations for the Belward Campus redevelopment. *See* Public Hearing Draft, pgs. 63-64. JHU, however, continues to have concerns with any recommendation that "requires" adaptive reuse of the Belward Farm buildings. *See* Public Hearing Draft, pg. 63. The existing farm structures are currently privately owned and maintained by JHU and some or all may not be appropriate for "recreational, educational, social, institutional, or cultural uses that complement the community and new development" in the future due to physical characteristics. There are also several foreseeable complications related to the management of any privately-owned adaptively reused structure, including

public use and access, compatibility with surrounding development, as well as safety and security. Therefore, JHU requests the following modification to the second bullet on page 63 of the Public Hearing Draft (with new language in underline and proposed deletions in ~~strikethrough~~): "~~Require~~ Consider adaptive reuse of the historic Belward Farm buildings (that will remain). . . ." JHU believes this change is needed to retain appropriate flexibility for facilitating the best planned comprehensive development of the Belward Campus and to protect private property rights.

Social Environment

JHU believes the Public Hearing Draft correctly acknowledges previously approved development applications (such as those for the Belward Campus) will provide privately owned public space, including a significant portion of the master-planned Muddy Branch Park. *See* Public Hearing Draft, pgs. 66-67. The open spaces and green areas incorporated in the redeveloped Belward Campus will serve a wide variety of functions with valuable opportunities for physical activity, recreation, relaxation, and community interaction. These amenities will be connected via pedestrian and bicycle facilities and designed with safety in mind. *See* Public Hearing Draft, pg. 68.

Natural Environment

The Public Hearing Draft recommends, among other things, that private redevelopment provide a minimum of 35% of the total site as "green cover," while "excluding forest cover on the property[.]" *See* Public Hearing Draft, pg. 71. The Public Hearing Draft also recommends surface parking lots on both public and private properties should provide at least 50% tree canopy coverage of the surface parking lot area. *See* Public Hearing Draft, pgs. 71-72.

JHU supports environmental sustainability as an important part of redevelopment. It is critical, however, to recognize there have already been several development applications approved over the course of several years that currently cover the planned comprehensive development of the Belward Campus, namely, concept plans, a preliminary plan (with amendment), and two site plans. These detailed approvals already incorporate a requirement of providing a minimum 30% canopy coverage of the surface parking lot area and a minimum 20% public use space, with no associated green cover requirement. As a matter of fairness, large sites that have already been comprehensively planned for redevelopment and governed by a series of carefully negotiated development approvals (such as the Belward Campus) should be grandfathered from the green cover and tree canopy coverage recommendations proposed in the Public Hearing Draft. JHU also respectfully

believes forest cover on a site should be *included* in any green cover calculation, and that solar canopies in parking lots should count towards the calculation for tree canopy coverage (similar to the green cover calculation recommendation). These modifications are consistent with environmental sustainability goals.

Economic Environment

The Public Hearing Draft aptly characterizes the Life Sciences Center planning area as "one of the county's main economic engines" and JHU supports the goal of "increas[ing] the Life Sciences Center's competitiveness as a major global life sciences innovation hub." *See* Public Hearing Draft, pg. 72. To this end, JHU agrees that providing additional housing in the planning area (via flexibility in zoning regulations to incorporate residences with existing and future life science uses) will assist in attracting and retaining both employers and employees. *See* Public Hearing Draft, pg. 73.

Implementation

The Public Hearing Draft accurately concludes the 2010 Plan's staging requirements have been a considerable barrier to achieving the vision for the Life Sciences Center planning area. *See* Public Hearing Draft, pgs. 73-74. Therefore, JHU agrees with the Public Hearing Draft's recommendation to remove the staging requirements established by the 2010 Plan. *See* Public Hearing Draft, pg. 74. As noted above, JHU also supports allowing more zoning flexibility to achieve mixed-use life sciences development. *See* Public Hearing Draft, pg. 74.

Thank you very much for your consideration of these comments. JHU is appreciative of the hard work that has gone into creating the Public Hearing Draft and looks forward to participating as the master planning process proceeds.

Sincerely,

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cc: Maren Hill, Montgomery Planning
Jessica McVary, Montgomery Planning
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Adventist HealthCare
Shady Grove Medical Center

Testimony of Daniel Cochran, President
Shady Grove Medical Center

Testimony on the Great Seneca Plan Public Hearing Draft

March 14, 2024

Good evening, Chair Harris and members of the Montgomery County Planning Board. I am Daniel Cochran, President of Adventist HealthCares's Shady Grove Medical Center, one of the largest landowners and employers in the Great Seneca Plan area. On behalf of the evolving Medical Center, I am pleased to comment on how the Great Seneca Plan may be improved to help the campus achieve critical healthcare objectives over the next few decades. Our primary goal is to preserve maximum flexibility in the Great Seneca Plan so that the Medical Center may adapt and grow in an ever-changing healthcare delivery system.

The approximately 40-acre Medical Center campus is in the heart of the Life Sciences Center portion of the Great Seneca Plan. It is surrounded by Medical Center Drive, Broschart Road and Blackwell Road extended. The property is developed with three hospital structures: an acute care medical surgical hospital, an acute impatient rehabilitation hospital and a behavioral health specialty hospital. These hospitals are spread out throughout the campus and currently operate semi-autonomously. When we say semi-autonomously, we mean operationally they are distinctly different structures – they have their own support systems like cafeterias, kitchens, and material receiving functions, to name a few.

The future of healthcare and viable financial sustainability for hospitals requires us to lean these systems and as such the architecting of a campus master plan that supports economies of scale wherever possible: e.g. one kitchen, one loading dock, interconnections to have one imaging department supporting all three sets of patients without having to go outside, etc. In the campus master plan, these three hospital structures will become one large connected medical facility emanating from our main hospital in the core of the campus. The campus plan will also provide what the Great Seneca Plan calls an infill "Opportunity Site" on the northwest portion of the campus

once the sprawling behavioral health hospital is relocated southward near the main hospital.

The Public Hearing Draft does not currently align with our anticipated campus growth plan regarding the recommended street framework. The Great Seneca Plan recommends two east-west vehicular connections through the campus: one through the Opportunity Site and the other directly through the anticipated expanded hospital facility. Only the Opportunity Site connection is feasible. While we understand the desire for connectivity and manageable block sizes, this aspiration should not preclude the Medical Center's imperative to grow as medical needs dictate. Submitted with this testimony is a map showing the proposed east-west connections through the campus that clearly illustrates why only the northern one may be accommodated.

In addition to eliminating conflicting connections through the campus, the Medical Center seeks clarity on Great Seneca Plan expectations regarding, street widths, density, green coverage, urban design and publicly accessible open spaces. We address these technical issues in an attachment submitted with the testimony.

Overall, we wish to impress upon the Planning Board that the Medical Center has unique needs that cannot be addressed by the general vision for the Life Sciences Center. We support the effort to ensure that the Life Sciences Center continues as the premier location for the life sciences and biohealth industries in the County. However, the Medical Center's healthcare delivery mission and specializing building types distinguishes it from other property owners and its needs should be respected in the final version of the Great Seneca Plan.

Thank you for the opportunity to share our perspective with you this evening. We look forward to working with you and your staff as the Great Seneca Plan evolves.