Montgomery Planning

THE GREAT SENECA PLAN: CONNECTING LIFE AND SCIENCE WORK SESSION #3



The Great Seneca Plan CONNECTING LIFE AND SCIENCE

Description

Staff will continue to discuss the recommendations in the Public Hearing Draft for the Life Sciences Center, specifically the opportunity sites in the built environment section and implementation of recommendations for the Life Sciences Center, including the recommended Life Sciences Center Overlay Zone. In addition to discussing the recommendations, staff will also discuss the relevant testimony received.

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SUMMARY

- The Planning Board received public testimony on the Great Seneca Plan Public Hearing Draft on March 14, 2024. The first work session, held on March 21, 2024, focused on the recommendations for the Life Sciences Center and testimony received for the built, social, and natural environment. The second work session, held on April 4, 2024, focused on the transportation recommendations, multimodal transportation analysis completed in support of the Plan, and relevant testimony.
- In the third work session, staff will continue to discuss the recommendations in the Public Hearing Draft for the Life Sciences Center, specifically the opportunity sites in the built environment section and implementation of recommendations for the Life Sciences Center, including the recommended Life Sciences Center Overlay Zone. Staff will also discuss testimony received related to specific properties and opportunity sites, including testimony related to recommended street connections.
- The Plan envisions the Life Sciences Center as a complete community, a place that will include a range of land uses, jobs, diverse housing options, services, and amenities to meet the needs of a variety of people within a 15-minute walk, bike ride, roll, or other trip through safe, accessible, and reliable transportation infrastructure. Implementation of this vision will require a combination of private development and public investment. Critical recommendations to advance implementation include the adoption of an overlay zone, development of funding mechanisms to implement Plan recommendations, and establishment of a place management organization.

MASTER PLAN INFORMATION

<u>Draft</u>	<u>Date</u>
Public Hearing Draft	April 5, 2024
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GREAT SENECA PLAN: CONNECTING LIFE AND SCIENCE

WORKSESSION #3: OVERLAY ZONE, OPPORTUNITY SITES AND IMPLEMENTATION

The Great Seneca Plan: Connecting Life and Science (Plan) is an update to the 2010 *Great Seneca Science Corridor Master Plan* (2010 Plan) and follows the 2021 *Great Seneca Science Corridor Minor Master Plan Amendment* (2021 Amendment). The Planning Board received public testimony on the Great Seneca Plan Public Hearing Draft on March 14, 2024. The first work session, held on March 21, 2024, focused on the recommendations for the Life Sciences Center and testimony received for the built, social, and natural environment. The second work session, held on April 4, 2024, focused on the transportation recommendations for the Life Sciences Center, multimodal transportation analysis completed in support of the Plan, and relevant testimony.

The third work session will continue to focus on the recommendations in the Life Sciences Center, specifically the opportunity sites in the built environment section, and implementation recommendations for the Life Sciences Center, including the recommended Life Sciences Center Overlay Zone. The third work session will also include discussions on testimony received related to specific properties and opportunity sites, including testimony related to recommended street connections.

LIFE SCIENCES CENTER OVERLAY ZONE

The Public Hearing Draft of the Plan acknowledges that the Life Sciences Center has attracted life sciences and residential growth since the adoption of the 2010 Plan but suggests that this growth has continued to develop as discrete single-use campuses and residential enclaves, reinforcing the existing auto-oriented transportation network, and impeding active, vibrant, communities and places. Recent development has made significant progress in engaging and activating the public realm through site design, architectural elements, and provision of privately-owned, publicly accessible open spaces, but additional efforts are necessary to achieve the Plan's vision of the Life Sciences Center becoming more than the sum of its individual parts. The Plan recommends a more compact form of development that promotes infill, adaptive reuse, and vertical growth, as well as a high-quality built environment that encourages social interaction and enables active, healthy lifestyles. To facilitate the implementation of this vision, the Plan recommends the establishment of the Life Sciences Center Overlay Zone to support mixed-use life sciences development and incentivize the production of affordable and market-rate housing.

RATIONALE FOR PROPOSED LIFE SCIENCES CENTER OVERLAY ZONE

Properties in the Life Sciences Center are zoned Life Sciences Center (LSC), Employment Office (EOF) Commercial Residential (CR), Commercial Residential Town (CRT) and Commercial Residential Neighborhood (CRN) today, as shown in Figure 1. While the Plan recommends largely retaining these underlying zones, as shown in Figure 2, the Plan acknowledges that the existing zones have limitations to achieve the vision of the Life Sciences Center as a complete community with a range of land uses, jobs, diverse housing options, services, and amenities. The purpose of the recommended overlay zone is to attract and retain life sciences development, incentivize production of housing, and achieve a complete community, characterized by an inviting, people-oriented scale of development.



Figure 1: Life Sciences Center - Existing Zoning



Figure 2: Life Sciences Center - Proposed Zoning

PROPOSED LIFE SCIENCES CENTER OVERLAY ZONE - ZONING TEXT AMENDMENT

Implementation of the recommended overlay zone will require a Zoning Text Amendment (ZTA) to Section 4.9 of the Zoning Ordinance. While a proposed ZTA will be introduced to the Planning Board at a future date, staff acknowledges that the components of the proposed overlay zone are necessary to consider concurrent with the Plan. The following sections detail an approach and recommended elements for the Life Sciences Center Overlay Zone. Staff requests guidance from the Planning Board on these elements to inform the draft ZTA.

LIFE SCIENCES CENTER (LSC) OVERLAY ZONE

The Life Sciences Center (LSC) Overlay Zone is envisioned as a new overlay zone that would cover the Life Sciences Center in the Plan, as shown in Figure 3. The proposed overlay zone is divided into three primary sections: purpose, land uses, and development standards.



Figure 3: Life Sciences Center - Area Recommended for Overlay Zone

Purpose

The purpose of the proposed LSC Overlay Zone is to attract and retain life sciences development, incentivize production of housing, achieve a complete community, characterized by an inviting, people-oriented scale of development, and implement the recommendations of the Great Seneca Plan, specific to land uses, densities, heights, public benefits, and parking.

Land Uses

The proposed LSC Overlay Zone seeks to establish consistency in the permitted, limited, and uses not allowed to increase flexibility for future development and support the economic competitiveness of the Life Sciences Center. The proposed overlay zone envisions uses including multi-unit living, life sciences, office, and retail as permitted uses, some of which are either limited or not allowed in the existing LSC, CR, and CRT zones. The proposed overlay zone further envisions providing specific guidance for permitted uses, including lower density residential uses such as two-unit living or townhouses. In addition to the permitted, limited, and uses not allowed, the LSC Overlay Zone also seeks to provide additional flexibility for tracts larger than 5 acres, with an underlying LSC Zone. Specifically,

- A minimum of 40% of the gross floor area must be for life sciences and related uses. The proposed gross floor area used for the purpose of calculating the minimum percentage of life sciences uses excludes educational facilities.
- The remaining gross floor area may be one or a combination of permitted uses. The maximum percentages for retail and residential in the underlying LSC zone do not apply.

The LSC zone currently limits residential uses to 30% of the maximum permitted floor area ratio and retail uses to 15% of the maximum permitted floor area ratio. In areas of the LSC with an underlying LSC zone, staff recommends maintaining the 40% minimum of life sciences and related uses to maintain and grow this significant employment center. Staff further recommends flexibility for the remaining 60% of the gross floor area to achieve a mixture of uses, services, and amenities that can facilitate the transition of the Life Sciences Center to a complete community.

Development Standards – Density and Height Limits

In the proposed overlay zone, staff recommends that development receive additional density, not to exceed 200% of the mapped FAR and additional height, not to exceed 200 feet, for the provision of public benefits, as described below in the Public Benefits section. Staff recommends that the proposed overlay zone require development to apply the full mapped density prior to receiving additional density.

Development Standards – Public Benefits

Currently, applicants interested in pursuing the optional method of development in the county's Commercial / Residential and Employment Zones are granted higher densities in exchange for significant public benefits to support the additional density. The public benefits are codified in Section 4.7 of the Zoning Ordinance and detailed in the 2017 Commercial / Residential and Employment Zones Incentive Density Implementation Guidelines.

Montgomery Planning is currently engaged in a project to update the public benefits point system for the Commercial / Residential and Employment Zones, a project called the Incentive Zoning Update.

Goals of the Incentive Zoning Update are to align the current public benefits point system with the county priorities identified in *Thrive Montgomery 2050*, the Climate Action Plan, and the Racial Equity and Social Justice Act, as well as further recommendations and priorities of master and sector plans, such as the Great Seneca Plan.

Staff have coordinated closely to align the proposed Life Sciences Center Overlay Zone public benefits with the preliminary approach being considered in the Incentive Zoning Update project, including the potential categories and types of public benefits. Staff acknowledges that the ZTA for the proposed Life Sciences Center Overlay Zone will likely need to follow the Planning Board's action on the Incentive Zoning Project; however, staff further acknowledges the need to consider these important elements in parallel with the Planning Board's review of the Great Seneca Plan.

Consistent with the preliminary approach of the Incentive Zoning Update, staff recommends that the Life Sciences Center Overlay Zone allow optional method development to earn additional density for providing public benefits in the categories of Housing for All, Infrastructure for Compact Growth, Complete Community Amenities, and Environmental Resilience, consistent with the county's policy priorities. Additional information on each of the recommended public benefit categories are discussed in greater detail below. Staff anticipates discussing the specific public benefits within each category with the proposed ZTA, which is anticipated for presentation to the Planning Board at a future date.

Housing for All

The Housing for All category, as envisioned in the Life Sciences Center Overlay Zone, seeks to incentivize the production of market rate and affordable housing, particularly in the heart of the Life Sciences Center where the underlying zoning is LSC. Under the Housing for All category, applicants could earn additional density when meaningful percentages of higher-density residential development are provided through infill development and redevelopment. It is important to note that the inclusion of housing within developments will not be mandated through the proposed overlay zone and the county's Moderately Priced Dwelling Unit (MPDU) law will remain unaltered. Any project proposing greater than twenty dwelling units will be required to include a minimum of 12.5% MPDUs, or other MPDU obligation as established by code. Rather, the overlay zone is anticipated to provide flexibility and incentives in exchange for additional density for those interested in pursuing residential development in Life Sciences Center.

Infrastructure for Compact Growth

The Infrastructure for Compact Growth category seeks to advance implementation of improvements to the built and social environments recommended in the Plan. These include contributions to the Key West Avenue Promenade, Great Seneca Greenway, and Life Sciences Loop trail.

Complete Community Amenities

The Complete Community Amenities category seeks to incentivize a mixture of uses and neighborhood services, a vibrant public realm, and design excellence. Public benefits include flexible, step-up space for life-sciences start-ups, mixed-use development, improvements to existing or creation of new parks or public open spaces, and strategies that further sustainable building, sustainable site design, and design excellence.

Environmental Resilience

The Environmental Resilience category, as envisioned in the proposed overlay zone, seeks to incentivize energy efficiency, renewable energy, green building, and sustainable site design.

Development Standards and Procedures

In addition to the land uses, densities, heights, and public benefits, staff also recommends considering the following standards and procedures in the proposed overlay zone:

- Prohibit parking between the building and the street and emphasize a strong preference for structured or underground parking.
- Eliminate minimum parking requirements established by Section 6.2.4.
- Require all development in the proposed overlay zone to seek sketch plan and site plan approval under Section 7.3.3 and Section 7.3.4, respectively. Establish the building placement, orientation, and transparency requirements through the site plan approval process.
- Require optional method development at 0.5 FAR.
- Require applicants to purchase Building Lot Termination (BLT) easements or make payments to the Agricultural Land Preservation Fund (ALPF), in an amount equal to 7.5% of the incentive density floor area, consistent with the existing requirements in the CR zone, rather than an amount equal to 50% of the incentive density floor area as currently required in the LSC zone.
- Require site plan approval for limited uses.

ZONING TEXT AMENDMENT PROCESS

The LSC Overlay Zone will require a Zoning Text Amendment (ZTA), an action separate from the review and approval process for the Great Seneca Plan. While the ZTA requires a separate action, it is integral to achieving the Plan's vision and recommendations. Staff therefore requests guidance from the Planning Board on the proposed LSC Overlay Zone. Staff will incorporate guidance received into a

draft ZTA for the Planning Board's consideration, concurrent with or immediately following the Planning Board's action on the Incentive Zoning Update and approval of the Planning Board Draft Plan.

OPPORTUNITY SITES

The Great Seneca Plan includes recommendations for opportunity sites, shown in Figure 4, that are envisioned to help create the building form, street grid, and public amenities central to the Plan vision. The sites are currently at different stages of delivering new buildings and benefits; some sites are under construction or undergoing development review, while other sites have been identified by property owners or staff as high potential sites.





During the third work session, staff will discuss testimony received related to the opportunity sites in the Life Sciences Center. Testimony received from the property owners and their representatives has been reattached as Attachment A.

BELWARD

The Belward Campus, owned by Johns Hopkins University (JHU), has a long-standing preliminary plan as well as two approved site plans. Trammel Crow Company (TCC) is leasing the northern half of the site which is covered by one of the existing site plans. JHU and TCC each submitted written testimony on the Public Hearing Draft.

They expressed support for the overall vision of the Plan, recommendations making it easier to infill residential uses with healthcare and/or life sciences uses, Plan acknowledgement of previous JHU contributions to open space, and the removal of staging recommendations. Additionally, the letters included requests and highlighted issues, which are summarized below with staff's response.

1. RED POLICY AREA

JHU and TCC Testimony:

Belward Campus should be included in the creation/expansion of the red transportation policy area recommended in the Public Hearing Draft.

Staff Response:

Red policy areas have historically been limited to central business districts and Metro station policy areas. They are characterized by consolidated Commercial-Residential and Employment zoning. These areas have high levels of transit service and multi-modal options. In red policy areas, blocks are spaced approximately 400-500 feet which creates a more walkable, bikeable and transit focused environment. Red policy areas are exempt from the motor vehicle adequacy test in development review.

The Belward site approvals are more like a campus style development than a central business district. Belward does contribute to the Plan street grid, but also relies on a loop road that does not achieve a high level of connectivity. There is planned transit with dedicated lanes that will run through the Belward site. While this will greatly improve transit access, it does not achieve the high level of transit service associated with the Red Policy areas. The core of the Life Sciences Center will be serviced by three high quality transit lines.

2. LANGUAGE TO SUPPORT EXISTING APPROVALS

JHU Testimony:

Add new language to opportunity site description of Belward to add "preliminary plan" so the text will read (additions in red): "This Plan retains many of the recommendations from the 2010 Plan and supports implementation of the approved preliminary plan and site plans." (Plan, page 39)

TCC Testimony:

"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."

"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 . . . "

Staff Response:

The Plan retains many of the recommendations from the 2010 Plan, which are aligned with the approved preliminary and site plans for the Belward Site. The recommended cross-sections in the plan also align with these approvals. The Plan will not affect any existing site or preliminary plan approvals unless they are amended through the regulatory review process.

Staff does not object to the changes proposed by JHU and TCC in their testimony.

3. ADAPTIVE REUSE

JHU Testimony:

Should not require adaptive reuse, instead "consider" adaptive reuse of historic farmhouses on the Belward site.

Staff Response:

The 2010 Plan affirms that the historic Belward farm site, including the house and barns, be used for recreational, educational, social, or cultural uses that complement the community and new development. The 2011 amended Preliminary Plan (11996110A) reaffirms the recommendation. Staff believes adaptive reuse should remain a requirement.

4. GREEN AND TREE COVER

JHU Testimony:

Requirements for green cover and tree canopy should not apply to large sites that have already been comprehensively planned.

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.

Staff Response:

Comprehensively planned sites with existing valid approvals will remain valid unless amended or expire. Plan recommendations will apply to sites that are submitting new applications for regulatory review or amending existing plans.

TRAVILLE PARCEL AND MONTGOMERY MEDICAL (FORMERLY JHU MONTGOMERY COUNTY MEDICAL CENTER)

Alexandria Real Estate owns both the Traville Parcel N property and the Montgomery Medical Property, along with other holdings in the Plan area. They are one of the largest property owners in the area. Since 2019, Alexandria has developed approximately one million square feet of biotech and lab uses in the Life Sciences Center.

Alexandria testified in support of removing the staging requirements from the 2010 Plan and creating opportunities on publicly owned sites. The property owner also raised several concerns and considerations. Accompanying the submitted testimony, Alexandria attached a list of questions. After the public hearing, staff met with Alexandria to provide clarification and answers to their questions.

1. MIX OF USES

Alexandria Testimony:

The property owner is concerned that the Plan seeks to encourage new housing and a mix of uses within the Life Science Center. They state, "plan needs to be very clear about the desired locations for housing opportunities and for the benefits of life science investors who would want this certainty."

Staff Response:

The Plan's envisions that the area remains a life science and innovation hub. The Plan and overlay zone seek to insert residential uses throughout the Life Sciences Center. The proposed overlay zone will relax the restrictions on residential uses, however it will not require a mix of uses on any parcel.

2. CONNECTIVITY

Alexandria Testimony:

Alexandria is concerned that the Plan's "urban style connectivity, including new streets and alleys, require immense operational coordination and multi-agency approvals" that will add time to regulatory review and create unpredictability.

Staff Response:

The creation of a fine grain street grid is central to the Plan vision for the Life Sciences Center. The Plan envisions a complete community with a range of land uses, jobs, housing options, safe, accessible, and reliable transportation infrastructure, services, and amenities. Furthermore, the Plan seeks to transform roadways from barriers to vital elements of the public realm. Planning staff appreciate that the life sciences industry is a fast-moving industry, and that predictability is key throughout the development process. The time restrictions for regulatory review will still apply. Montgomery Planning has also implemented the Speed-to-Market Initiative which streamlines the approval process for development projects by consolidating the processes of planning and land-use approvals.

DECOVERLY

This site has long-standing preliminary and site plan approvals including office and residential, and research and development uses. No testimony was submitted regarding this site. The property owner for four of the seven parcels identified as an opportunity site submitted testimony supporting rezoning from EOF zone to CR, but also raised concerns.

1. DOWNTOWN STREETS

Beacon Capital Partners Testimony:

Property owner is primarily concerned with the north-south and east-west streets shown in the Plan. They ask for the recognition of the existing improvements on the property, the disparate ownership interests, and how the property is realistically likely to redevelop over time. They specifically request the Plan:

- Clarify that the road network will only be required in the event of a comprehensive redevelopment of the Property and the additional parcels needed to complete the network.
- Add language providing for a flexible alignment.

• Reclassify the road to a street with a narrower right-of-way, such as a Town Center Street or reduce the recommended right-of-way width for a Downtown Street.

Staff Response:

Staff will discuss these concerns with the Planning Board during the work session.

PUBLICLY OWNED SITES (9700 GREAT SENECA HIGHWAY, 9925 BLACKWELL ROAD, 15000 BROSCHART ROAD, 14910 BROSCHART ROAD)

These publicly owned sites are occupied by various institutional uses, and the redevelopment of these prominent locations would significantly contribute to implementing the vision of this Plan. Staff engaged with the Maryland Department of Health and the Montgomery County Department of General Services in developing Plan recommendations.

The 2010 Plan reserved space for a school site, if needed, at the corner of Darnestown Road and Great Seneca Highway. During the work session, staff would like to discuss recommendations regarding school sites.

THE PROPOSED "GROVE" (2611 RESEARCH BOULEVARD, 15300 CORPORATE BOULEVARD, 15304 CORPORATE BOULEVARD, 9201 CORPORATE BOULEVARD, 9211 CORPORATE BOULEVARD)

B9 Sequoia Grove owns five adjacent properties, 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 property owner expressed support for the overall vision of the Plan, including additional housing options and public amenities to develop the Life Sciences Center into a "complete community." While they expressed support for the site-specific recommendations, the property owner expressed concern about the burden that required infrastructure and amenities could pose on development.

1. OPEN SPACE

B9 Sequoia Testimony:

The Draft Plan (page 30, Figure 11) locates a new public open space right in the middle of two 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). Property owner objects to concentrating open space instead of dispersing it through the site. Plan assumes that all of the owner's properties redevelop at the same time. B9 Sequoia requests a revision to Figure 11 to note that it is for illustrative purposes only.



Figure 5: Conceptual Diagram of the Life Sciences Center as a Complete Community

Staff Response:

Figure 11, "Conceptual Diagram of the Life Sciences Center as a Complete Community," (included herein as Figure 5) is intended for illustrative purposes only. As a sketch, sizes of streets, parks and open spaces are not exact and therefore, it does not include a scale. Staff agrees with the recommendation to include additional language to clarify that the diagram is illustrative and recommends the following language:

"The Conceptual Diagram is an illustrative sketch intended to convey a sense of desirable future character rather than detailed recommendations for a particular design. Final road and open space alignment and design will be determined with new development or redevelopment of the site at regulatory review." The Plan does not require the Grove sites to provide any additional open space above what is required by code. The Plan and the conceptual diagram intend that the required public open space should be meaningful and consolidated, with final design to be determined during regulatory review. In practice, many sites under common ownership are redeveloped in phases. When this occurs, Planning staff work with applicants at the time of regulatory review to determine phasing of development and amenities (such as open space) and evaluate the need for interim open space.

2. CORPORATE BOULEVARD

B9 Sequoia testimony:

The extension of Corporate Boulevard through the property owner's sites would place undue burden "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...[the extension renders] the southwest corner of the Owner's 15304 Corporate Boulevard site essentially undevelopable."

Staff Response:

Expanding the street grid is central to the Plan's vision. The extension of Corporate Boulevard, shown in Figure 6, provides a valuable east-west connection. The expanded street grid promotes walkability and connectivity as well as provides alternative vehicular routes that allow local traffic to disperse throughout the network. In addition to improving connectivity within the Grove, the extension of Corporate Boulevard improves access to an important future site: Crown High School. Many development sites throughout the Plan area and the county have dedicated and constructed streets through their property. Staff will work with the property owner during the regulatory review process to determine the exact alignment of the street. Staff maintains the recommendation to keep Corporate Boulevard Extended as a master planned street.



Life Sciences Center Master Planned Streets

Figure 6: Map of Master Planned Streets in the Life Sciences Center

3. ROADWAY DEDICATIONS

B9 Sequoia Testimony:

The property fronts three streets. The property owner is concerned that required frontage improvements and dedications would be onerous for Omega Drive, Research Boulevard, and Shady Grove Road.

Staff response:

Montgomery Planning recognizes frontage improvements as an important contribution to the public realm. County code requires frontage improvements for properties located on a public road that are seeking a preliminary plan approval. Section 50-4.3.E.3. states "In a preliminary plan application containing lots fronting on an existing State, County, or municipally maintained road, the subdivider must provide any additional required right-of-way dedication and reasonable improvement to the road in front of the subdivision, including sidewalks and bicycle facilities, as required by Master Plan, the Road Design and Construction Code or by a municipality, whichever applies." Frontage improvements are required by code. Montgomery Planning recognizes these improvements as adding value to the property as well as the greater community.

4. FUTURE DEVELOPMENT DENSITY

B9 Sequoia Testimony:

The Plan anticipates high-density development. The property owner asserts that given present-day economics, these sites are not likely to redevelop as high or mid-rise apartments, but instead as for sale townhomes. The property owner requests that the overlay zone not place any minimum density requirements on sites.

Staff Response:

The vision for this Plan area is a walkable, mixed-use downtown where people can live, work or play. Medium and high-density residential development will complement the surrounding single family and townhome developments adjacent to the Plan area, provide housing options for current and future residents and deliver amenities and public benefits supportive of the Plan's stated vision. The overlay zone does not place any minimum density requirements.

THE GUARDIAN PROPERTY (15200 SHADY GROVE ROAD)

This Plan recommends rezoning these properties from EOF 1.5, H-75 to CR 3.0, C-3.0, R-3.0, H-150 to promote mixed-use redevelopment with life sciences and/or residential uses that continues the urban pattern already established by the Bell Shady Grove and Mallory Square apartments to the west.

1. ROAD RECOMMENDED IMMEDIATELY WEST OF PROPERTY

Guardian Testimony:

The property owner opposes implementation of a roadway for which space has been dedicated but never built. The property owner requests that the area be maintained as a grassy area open to the public and perhaps an extension of the proposed Key West Promenade.

Staff response:

Expanding the street network to provide a fine grain street grid is central to the Plan's vision. Currently, limited local street grid connectivity requires circuitous driving routes for travelers accessing destinations within the LSC and funnels traffic onto a few main roads. This limited grid also requires circuitous travel for walking and biking. The expanded street grid promotes walkability and connectivity, while also allowing local traffic to disperse throughout the network which supports recommendations to repurpose travel lanes. The Plan identifies this portion of Key West Avenue as a Downtown Boulevard and the nearby portion of Research Boulevard as a Downtown Street. The *Complete Streets Design Guide* specifies both a maximum spacing for protected crossings and a generally accepted minimum spacing for signalized intersections of 400' on both of these street types. Fully signalized intersections support protected crossings. Road I (the road that is the subject of this testimony) is approximately 650' from Shady Grove Road to the east and approximately 600' from Siesta Key Way to the west; while these distances are still longer than desired, removing Road I would perpetuate an uninterrupted segment of Key West Avenue more than 1,200' long. Staff maintains the recommendation to keep Road I as a master planned street.

2. FRONTAGE AND OFF-SITE IMPROVEMENTS

Guardian Testimony:

The property fronts two streets. The Plan recommends the property improve frontage along both frontages as well as contribute to the Key West Promenade. The property owner is concerned that the frontage improvements and off-site improvement would be onerous for the property if it were to redevelop.

Staff response:

As stated previously in this memo, frontage improvements are required in County Code. Any off-site improvements will be proportionate to the development, as defined by the LATR Proportionality Guide.

3. EXPAND USES IN CR ZONE

Guardian testimony:

As part of the overlay zone, Guardian requests that "Animal Research Facility" use be permitted throughout the Life Sciences Center, not just in the LSC Zone.

Staff response:

Staff supports the suggestion to add "Animal Research Facility" as a permitted use throughout the Life Sciences Center as part of the overlay zone. Animal research is a critical part of life science research and development.

ADVENTIST HEALTHCARE SHADY GROVE MEDICAL CENTER

The Adventist Healthcare Shady Grove Medical Center is an important anchor for the area and contributor to Montgomery County. It is both a major employer and service provider in the area.

The Shady Grove Medical Center anticipates redevelopment of their approximately forty-acre campus in the coming years. The campus has unique infrastructure requirements and constraints. The Plan seeks to balance the needs of the campus with the vision for the Life Sciences Center to become a complete community, characterized by a high-quality built environment and vibrant public realm.

1. VEHICULAR CONNECTIONS

Shady Grove Medical Center Testimony:

The Plan recommends two east-west vehicular connections through the campus. The property owner states that only one connection is feasible.

Staff Response:

The Shady Grove Medical Center is located on Medical Center Drive and Broschart Road, which the Plan classifies as Downtown Streets. The Complete Streets Design Guide recommends a maximum distance of 400 feet between protected crossings for Downtown Streets. Locating two streets that connect Medical Center Drive and Broschart Road would nearly achieve the recommended maximum distance. The introduction of two streets would also contribute to the Plan's street grid which is crucial to creating a more walkable community and allowing traffic to disperse through the Plan area.

2.CLARIFICATIONS

Shady Grove Medical Center Testimony:

The Medical Center seeks clarity on Plan expectations regarding street widths, density, green coverage, urban design and publicly accessible open spaces.

Staff Response:

The two recommended streets are Road R and Medical Center Way extended. Both streets are classified as Downtown Streets and have a right-of-way of eighty feet, as shown on pages 47-48 pf the Public Hearing Draft in Table 2: Life Sciences Center Street Classification, Target Speed, Right of Way, Transit Lane, and Bike Facility.

The Plan affirms the existing zoning and density for the site, LSC 1.5, H 150. The maximum mapped density is a 1.5 Floor Area Ratio. The Medical Center could build out their gross floor area to one and a half times the parcel size. The proposed overlay permits additional density and height—beyond the mapped zoning—with the provision of select public benefits.



Figure 7: 1.5 Floor Area Ratio Diagram

The green coverage, discussed on page 71 of the Public Hearing Draft:

"On private property, provide a minimum of 35% green cover of the total site, excluding existing forest cover on the property, which may include the following, either singly or in combination: • Intensive green roof (6 inches or deeper)* • Tree canopy cover • Vegetative cover • Landscaped areas • Rain gardens and bioswales • Solar energy and green roof * *If on-site energy generation requires the use of either the roof or open space, accommodations for these features may alter the 35% minimum green cover requirement.*"

Urban design strategies to implement the Plan will seek to balance the medical campus needs with the vision for the Life Sciences Center to become a complete community. Staff recognizes the Medical Center will continue to grow in a consolidated pattern consistent with current practices in the provision of medical services. Other areas within this superblock could develop to include a mix of uses and amenities to advance the complete communities vision in the Plan. Urban design guidelines will be developed to illustrate these concepts following the approval and adoption of the Great Seneca Plan.

The Plan does not require additional open space, beyond that required by code. However, as part of the open space requirement, the Plan recommends "a publicly-owned urban park, a minimum of ½ acre in size, be provided along Broschart Road, near the future transit stop." Page 65-66, Public Hearing Draft.

3.UNIQUE NEEDS

Medical Center Testimony:

The Medical Center states that it has unique needs that cannot be addressed by the general vision for the Life Sciences Center. Its healthcare use and specialized building types differentiate it from other property owners.

Staff Response:

Staff appreciates both the contributions of the Medical Center to the area and its unique challenges. The Medical Center is integral to the vision for the area as a healthcare provider and employment anchor. The Plan supports the unique needs of the Medical Center and envisions future growth and development that is more integrated with the surrounding community. There are examples from around the country of Hospital Oriented Development—hospital-centered community models—that support and celebrate health care service provision and leverage this important community asset. Accompanied by a mixture of uses, transportation options and a compact, urban form, the hospital and surrounding areas can transform into vibrant, economically resilient, health-promoting and complete community.

PROMARK PARTNERS (9711 AND 9715 MEDICAL CENTER DRIVE)

Together, the two adjacent properties owned by ProMark Partners are approximately eight and a half acres. These properties have redevelopment potential given their consolidated ownership, extensive surface parking lots and low intensity uses.

1. EAST-WEST STREETS

ProMark Testimony:

The Shady Grove Medical Center is physically and operationally connected to the buildings located on ProMark's sites. The property owner is concerned that the two east-west roadways recommended in the Plan will hamper the ability to create buildable blocks and create a physical barrier to the hospital. Property owner recommends a single, 60-foot wide, east-west street with location to be determined at the time of redevelopment.

Staff Response:

As stated above, the recommended streets support the policy guidance from the Complete Streets Design Guide as well as the Plan's vision for a walkable community.

2. DENSITY

ProMark Testimony:

The Plan maintains the current zoning with FAR of 1.5, the property owner requests higher potential densities to support development on the site. ProMark requests revising the allowable FAR from 1.5 to 2.0 and that the limitations on residential be removed or relaxed.

Staff Response:

Staff supports greater flexibility in the development of the ProMark site. The overlay zone will provide additional zoning capacity which will allow the site to reach a higher FAR than what the current zoning allows. The overlay zone also relaxes the restrictions on residential uses in the LSC Zone.

ELMS AT PSTA

The Elms at PSTA has an approved site plan and is currently under construction. The site will deliver an athletic field, trails and public open space, new street connections, and 630 residential units. The property owner did not submit any testimony. The Montgomery County Department of General Services (DGS) expressed a desire for more flexibility in zoning for the county owned parcel at the intersection of Great Seneca Highway and Darnestown Road. They requested rezoning the parcel from CR 1.0, C-0.5, R-1.0, H-150' to CR 1.0, C-1.0, R-1.0, H-150'. Staff presented this change to the Planning Board during the first work session on March 21, 2024 which the Planning Board approved.

IMPLEMENTATION

Implementation of the Plan's vision and recommendations for the Life Sciences Center will occur through incremental development and investment over the next two-to-three decades. However, several actions are foundational to ensuring successful implementation. In addition to the Life Sciences Center Overlay Zone, other critical recommendations include:

- Establishing a place management organization in the Life Sciences Center to implement master plan recommendations and perform other supporting functions, including: 1) activate and program underutilized sites and open spaces; 2) develop a brand for the area and a plan for marketing it; 3) coordinate and implement placemaking, public realm, and infrastructure improvements; and 4) advocate for, directly fund, or apply for grants for key capital projects.
- Exploring the full range of funding mechanisms available to implement the Plan recommendations.
- Removing the staging requirements established by the 2010 Plan.
- Limit granting Adequate Public Facilities validity period extension requests for preliminary plans approved prior to October 30, 2014.

CONCLUSION

During the third work session, staff will continue to discuss the Plan recommendations for the Life Sciences Center. Staff will discuss 1) the proposed Life Sciences Center Overlay Zone; 2) the opportunity sites in the built environment section; 3) testimony received related to opportunity sites and specific properties, including testimony related to recommended street connections; and 4) implementation recommendations. Staff requests guidance from the Planning Board on the proposed LSC Overlay Zone, as well as guidance on potential revisions to Plan text and recommendations in response to testimony received.

Staff anticipates returning to the Planning Board on April 18, 2024, for the fourth work session to continue discussions on the proposed overlay zone and opportunity sites, as well as discussions on the Quince Orchard area. Staff also anticipates initiating discussion on recommendations for the remaining Plan areas, including the Londonderry and Hoyle's Addition area. The tentative agenda for the fourth work session is subject to change, at the discretion of the Planning Board.

ATTACHMENTS

Attachment A: Opportunity Site Testimony

ATTACHMENT A



March 12, 2024

Phillip A. Hummel phummel@milesstockbridge.com 301.517.4814

Artie Harris, Chair and Commissioners of the Montgomery County Planning Board 2425 Reedie Drive, 14th Floor Wheaton, Maryland 20902

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.



Montgomery County Planning Board March 12, 2024 Page 2 of 5

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 <u>underline)</u>: "This Plan retains many of the recommendations from the 2010 Plan and supports implementation of the approved <u>preliminary plan and</u> 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



Montgomery County Planning Board March 12, 2024 Page 3 of 5

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 <u>underline</u> 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 masterplanned 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



Montgomery County Planning Board March 12, 2024 Page 4 of 5

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,

MILES & STOCKBRIDGE P.C.

Thellip Hermel

Phillip A. Hummel



Montgomery County Planning Board March 12, 2024 Page 5 of 5

cc: Maren Hill, Montgomery Planning Jessica McVary, Montgomery Planning Carrie Sanders, Montgomery Planning Mitch Bonanno, JHU Leslie Ford Weber, JHU Matthew Myers, JHU

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 <u>Great Seneca Plan: Connecting Life and Science</u> (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 <u>Great Seneca Science Corridor Plan</u> 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 <u>Corridor Forward: The I-270 Transit Plan</u>. 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 <u>within the approved cross-sections for the</u> Belward properties <u>(either within the 50'</u> <u>median or on the road)</u> 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 <u>within its approved cross-sections (either within the 50' median or</u> <u>on the road)</u> to Muddy Branch Road . . .

* * * *



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,

EUMIA MATTA

Robert K. Sutton, Chair Historic Preservation Commission

Cc: Members, Historic Preservation Commission


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.

Great Seneca Plan Draft for Leadership

Questions and Comments for Alexandria





EWINGCOLE

MARCH 6. 2024

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		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 growththrough compact, mixed use development."	Please define "mixed use" for LSC
27		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			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			Does the proposal mandate housing on new or redeveloped properties?
33	Housing Recommendation		Is the County proposing housing on properties that are primarily life sciences?

Great Seneca Plan Draft for Leadership

Questions and Comments for Alexandria



MARCH 6. 2024

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 sough 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 sitesthe 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."
56	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.

Great Seneca Plan Draft for Leadership

Questions and Comments for Alexandria





EWINGCOLE

MARCH 6. 2024

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.

Patricia A. Harris, Esq. (301) 841-3832 paharris@lerchearly.com

March 21, 2024

Via Electronic Mail

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

Re: Great Seneca Plan: Connecting Life and Science Master Plan Comments on behalf of the Owners of 9501, 9509 and 9513 Key West Avenue and 15200 Omega Drive

Dear Chair Harris and Members of the Planning Board:

On behalf of Beacon Capital Partners, LLC ("Beacon") and the affiliated individual owners of 9501, 9509 and 9513 Key West Avenue and 15200 Omega Drive (the "Property"), we respectfully submit these comments on the draft "Great Seneca Plan: Connecting Life and Science Master Plan" (the "Draft Plan").

We support the Draft Plan's recommendations with respect to the land use designation and zoning for the Property. The Draft Plan appropriately designates the Property for high-density mixed use. The Property is currently zoned EOF 1.5, H 75' and is recommended for CR 1.5, C 1.5, R 1.5 H 150'. Three of the four parcels comprising the Property are improved with midrange sized commercial buildings accommodating office and research and development uses that range in size from 82,000 square feet to 260,000 square feet, with surface parking. The fourth parcel (9501 Key West Avenue) is currently vacant and is subject to a pending Site Plan Amendment. While the recommended zoning does not increase the overall allowable FAR, the change from EOF to CR allows a much wider array of commercial uses (the anticipated use of the Property for the foreseeable future) and at the same time, allows residential uses.

Our primary concern with respect to the Draft Plan is the recommendation for a Downtown Street Boulevard road network that Figure 18 of the Draft Plan shows running north-south and east-west over the Property.¹ While we appreciate and respect the County's goals to promote connectivity, there needs to be recognition of the existing improvements on the Property, the disparate ownership interests, and how the Property is realistically likely to redevelop over time.

¹ The Draft Plan appears to be inconsistent. While the text on page 64 regarding Decoverly provides only for "a street connection between Omega Drive and Diamondback Drive," Figure 18, in addition to calling for the east-west connection between Omega Drive and Diamondback Drive, also calls for a north-south connection from Key West Avenue to this new east-west connection. This inconsistency should be clarified.

The Property represents four of the seven parcels that comprised the original 22 acre 1986 Decoverly Preliminary Plan. Since the initial approval of the Decoverly Preliminary Plan, parcels have been individually conveyed to new owners, such that it is no longer a cohesive development with a single ownership. And, while the Property itself is currently owned by four affiliated entities, it is very likely that this could change. Moreover, the individual parcels have developed over time. The Draft Plan provides that "*redevelopment* should create a street connection between Omega Drive and Diamondback Drive..." [italics added]. While the Draft Plan does not specify that the road network should be created only in the event the Decoverly area redevelops comprehensively, realistically this is the only way that the network will be created. We are very concerned that the current recommendation would preclude an individual parcel owner from redeveloping given that they could end up with a nondevelopable parcel depending on the alignment of the road, which, based on the development plans of the adjacent parcels, may never connect to remaining portions of the planned road.

In addition, we disagree with the Draft Plan's recommendation for the Downtown Street Boulevard right-of-way to be 80 feet in width. This appears to be excessively wide and unnecessary, especially given the potential adverse impact on the Property. The Downtown Street Boulevard section on page 54 of the Draft Plan shows that within the 80-foot right-of-way, only 21 feet is devoted to vehicular travel lanes and the remaining 59 feet is devoted to bike paths, sidewalks, buffers and landscaping. This suggests that there may not be the acute need for many of the Downtown Street Boulevard vehicular connections shown on Figure 18. Moreover, the desired pedestrian and bike connections could be accommodated in a manner that does not jeopardize the development potential of the Property.

For these reasons, we respectfully request that the Planning Board consider the following recommendations with respect to the recommended street connections:

- Clarify that the road network will only be required in the event of a comprehensive redevelopment of the Property and the additional parcels needed to complete the network
- Add language providing for a flexible alignment
- Reclassify the road to a street with a narrower right-of-way, such as a Town Center Street or reduce the recommended right-of-way width for a Downtown Boulevard.

We appreciate your consideration of this request and look forward to working with Planning Staff as they finalize the Draft Plan.

Sincerely,

Patricia A. Harris

5789981.1

Artie Harris, Chair • March 21, 2024 • Page 3

cc: Ms. Maren Hill Ms. Adrianna Calderon



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 properties¹, 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 midrise 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 Elkopolater

Heather Dlhopolsky

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

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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.



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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. Public Improvement Requirements for Guardian Property

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

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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 Francise M, By:

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



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.

