

Item 14 - Correspondence

From: [Rogers, Elizabeth C.](#)
To: [MCP-Chair](#)
Cc: [Robins, Steven A.](#); [Kronenberg, Robert](#); [Sartori, Jason](#); [Anspacher, David](#); [Buckley, Darcy](#)
Subject: Glenmont Forest Investors, Limited Partnership - Testimony on Growth and Infrastructure Policy
Date: Tuesday, June 25, 2024 11:06:51 AM
Attachments: [Letter to Planning Board re GIP Update and Changes to Red Policy Area and Infill Impact Area in Glenmont\(6057103.1\).pdf](#)

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Chair Harris and Members of the Planning Board,

On behalf of Glenmont Forest Investors, Limited Partnership please find attached testimony submitted on the Growth and Infrastructure Policy Update, for your consideration at the June 27th worksession.

Thanks,
Liz Rogers
Steve Robins

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June 25, 2024

Mr. Artie Harris, Chair
And Members of the Montgomery County Planning Board
2425 Reedy Drive, 14th Floor
Wheaton, Maryland 20902

**Re: Growth and Infrastructure Policy 2024-2028 Update
Adjustment to Red Policy and Infill Impact Area Boundaries for Glenmont**

Dear Chair Harris and Members of the Planning Board:

Our firm represents Glenmont Forest Investors, Limited Partnership, (“Glenmont Forest”), the owner of the Glenmont Forest Apartments located in the southeast quadrant of the intersection of Georgia Avenue and Randolph Road at 2300 Glenmont Circle in Silver Spring (the “Property”). The Property contains approximately 34 acres and is in the process of being rezoned to the CRF 1.75 C 0.25 R 1.5 H 75 zone (the “LMA”). The purpose of this letter is to request that the boundaries of the Red Policy and Infill Impact Areas in Glenmont be expanded to include the Property. The current boundaries for these Policy Areas stop at Randolph Road (to the South). As a result, the Property presently is located in the Orange Policy Area and Turnover Impact Area. These designations are inconsistent with important and controlling planning documents that would support locating the Property in the Red Policy and Infill Impact Areas.

We recognize that this request is coming to the Board a bit late in the process; however, for the reasons set forth in this correspondence, we believe the Red Policy and Infill Impact Areas are the more appropriate designation for the Property. We also would note that during the Planning Board’s review of the LMA, the Planning Board specifically requested the Applicant and Staff to recommend ways that the Board could assist in promoting development on the Property, including making the process more streamlined and the development opportunity economically feasible. The request set forth herein to adjust the Policy Area boundaries directly responds to the Planning Board’s inquiry.

Over the past decade or so, Glenmont has been a top priority for the County and identified as an area that is highly desirable for redevelopment. Glenmont was designated as one of the

County’s Enterprise Zones. This designation resulted in favorable treatment to development in Glenmont. However, just recently, the Enterprise Zone designation expired, given a change in demographic conditions. As such, the associated benefits of this former designation are no longer available to Glenmont. Irrespective of this demographic shift, it remains very difficult to develop in Glenmont. Accommodating this request to adjust the Policy Area boundaries would provide a meaningful tool to help development move forward on the Property. For example, certain transportation testing is not required in the Red Policy Area and impact taxes are lower in both. This difference in impact tax rates would be extremely helpful in achieving a large-scale project on the Property.

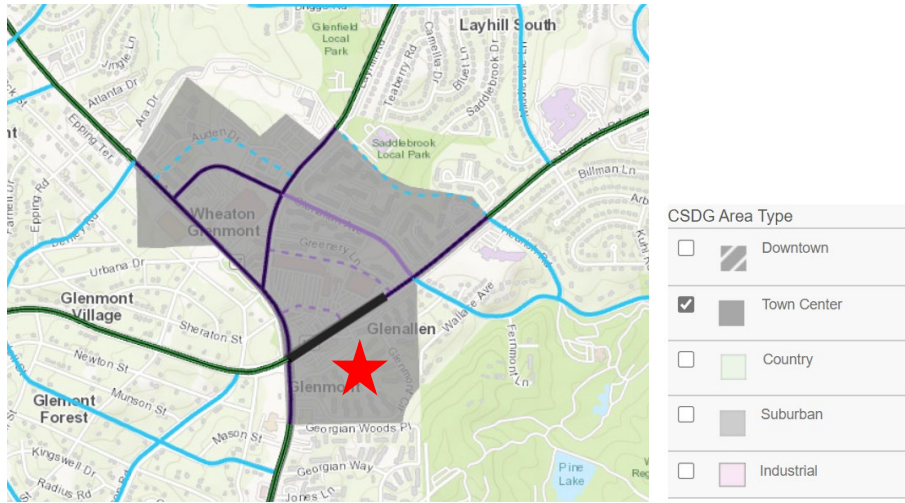
Aside from these benefits, we would note that these policy area modifications are necessary to ensure the Property is treated similarly to surrounding properties, in accordance with the County’s Policy recommendations. Infill Impact Areas are appropriate for those areas with “[h]igh housing growth predominately in the form of multi-family units that generate relatively fewer students on a per-unit basis.” (See Public Hearing Draft, Growth and Infrastructure Policy 2024-2028, page 4). Red Policy Areas are envisioned for “Downtowns with current or master planned high-density development and premium transit service (e.g., Metrorail, Purple Line, BRT).” (See Public Hearing Draft, Growth and Infrastructure Policy 2024-2028, page 24). The Property, which is located within ½ mile of the Glenmont Metro Station and recommended for redevelopment with greater densities certainly falls within these descriptions.

The Approved and Adopted 2013 Glenmont Sector Plan specifically identifies the Property as part of the Glenmont Core and as one of the properties that would be highly desirable for a significant density boost and redevelopment. In addition to the Property, the other properties included in the Glenmont Core are: the Glenmont Shopping Center, Glenmont Metro Center and a few other existing residential multi-family properties. Yet from a Policy Area viewpoint, and even though the Property is also located within the Glenmont Core, the Property is treated differently and less favorably.



See Glenmont Sector Plan Page 17.

Additionally, the Complete Streets Design Guide as contained in the Master Plan of Highways and Transitway, locates all of the properties within the Glenmont Core, including the Property, in the Town Center Area. There is no distinction between any of the properties, like the Glenmont Shopping Center or the Glenmont Metro Center and the Property, when it comes to identifying which properties in Glenmont should be part of the “Town Center.” Yet these other “Town Center” properties are located in the Red Policy and Infill Impact Areas, whereas the Property is not. This is yet another compelling reason why the Property should be part of the Red Policy Area and Infill Impact Area.

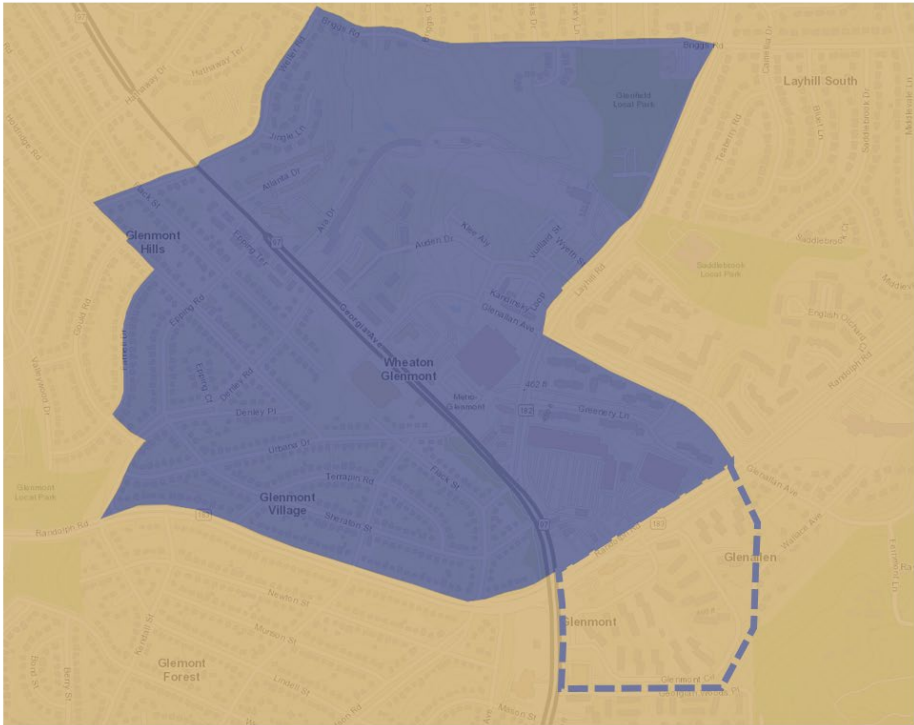


Excerpt from Master Plan of Highways online GIS Map.

For the reasons set forth in this correspondence, we respectfully request that the Planning Board recommend that the Policy Area boundaries be adjusted to match the Sector Plan Core Area and Complete Streets designation of the Town Center Area, as illustrated below.



- Green
- Orange
- Red
- Red Area Expansion
- Yellow



- Infill Area Expansion
- Infill
- Turnover

Making this adjustment will place the Property in the Red Policy and Infill Impact Areas and ensure that the properties in Glenmont are being similarly treated. Importantly, the proposed boundary adjustments will have a meaningful impact on the future redevelopment of the Property, and help the County's vision for Glenmont be realized. This adjustment is entirely consistent with how policy areas have been determined in the past throughout the County and equally importantly, embraces and advances longstanding County policies regarding redevelopment in areas that are in need of activity, like Glenmont.

The Growth and Infrastructure Policy is an important tool in the County's tool belt for implementing important land use policies and objectives. This request to make these adjustments are fully in-line with similar County policy decisions.

We appreciate your time and consideration of our request.

Sincerely,



Steven A. Robins



Elizabeth Rogers

Cc: Mr. Jason Sartori
Mr. Robert Kronenberg
Mr. David Anspacher
Ms. Darcy Buckley