July 22, 2025

Re: Parklawn Self Storage, Site Plan No. 820250070

Dear Chairman Harris and Commissioners,

**Please require the applicant to:**
**1) Bury the overhead utilities along their frontage**
**2) Install pedestrian scale lighting in the public right of way along their frontage**

**Utility Undergrounding**
This is an example of a project that would have benefited from a Utility Functional Plan as recommended by the Complete Streets Design Guide. Under such a plan, the establishment of guidance, standards and options for undergrounding would provide more certainty for applicants, staff and communities, better coordination and a more efficient allocation of resources.

This segment of Parklawn Drive is classified as a Town Center Boulevard in the Master Plan of Highways and Transitways. The Complete Streets Design Guide (Figures 2-62 & 4-19) requires utility undergrounding on Town Center Boulevards unless determined otherwise by the Planning Board. The White Flint 2 sector plan includes the undergrounding of utilities among public benefit priorities for the plan area. Burying overhead utilities benefits electrification, a key County climate priority, by improving the reliability of the grid. Undergrounding also facilitates a healthy tree canopy by allowing the planting of large overstory trees in the public right of way.

**Pedestrian Scale Lighting**
Per the Complete Streets Design Guide (Figure 2-34, pedestrian scale lighting is a required design feature of Town Center Boulevards. The existing Pepco-owned and maintained roadway scale streetlights mounted on wood poles provides insufficient pedestrian lighting. The installation of pedestrian scale lighting will improve pedestrian safety. It is consistent with the MCDOT's and Planning's Streetlighting Design Requirements and with the County's vision zero plans. As proposed, the only light provided in the public right of way will be from Pepco's antiquated high pressure sodium lights which provide poor pedestrian illumination and are spaced far apart. Pepco is currently under a 2024 order by the Maryland Public Service Commission. The order resulted from a staff investigation of a formal complaint about failure to provide street lighting service that is safe, adequate, just, reasonable, economical, and efficient as required by state law. The complaint outlined issues with Pepco's slow repairs, poor recordkeeping, a deficient outage reporting website and billing errors.

**Utility Coordination**

Per the staff report, there is correspondence that undergrounding is inadvisable because:

1) The location is too close to Pepco's Parklawn substation building and the frontage is too short
2) Some of the lines along this stretch are not of the type that can be cost effectively buried
3) It would affect other properties and is complicated by lines crossing Parklawn Dr

However these statements fail to acknowledge a much larger ongoing project in the same vicinity. Pepco is in the process of implementing its new White Flint Substation project. Currently, all properties in the area receive their electricity distribution from Pepco's Parklawn substation, located at 11920 Parklawn Drive. After the White Flint substation project is completed, properties on the west side of the CSX tracks will receive their electricity distribution from the new White Flint substation instead of the old Parklawn substation. This transition will involve a massive reconfiguration of distribution poles, wires and transformers in the public right of way on and beneath streets throughout the vicinity. It may not be safe to assume that existing poles and wires will remain unchanged in the future.

The Planning department and the Department of Permitting Services may not fully appreciate the scale of Pepco's White Flint substation project. Pepco provides little information about the project on its website. According to Pepco's filings with the Federal Energy Regulatory Commission, Pepco has spent and will spend tens of millions of dollars on the project to reconfigure distribution poles, wires and transformers. The correspondence in the staff report appears to ignore this bigger picture and opportunities for coordination.

Pepco currently has seven (7) distribution feeder lines originating at the Parklawn substation that will need to be reconfigured because they cross the CSX tracks. Each distribution feeder line carries 13,000 volts of electricity and is normally placed either underground or at or near the top of a wood utility pole. Those feeder lines connect to distribution transformers that step down the voltage to a level which can be used by individual properties. There are four existing distribution feeder lines that currently run along the Parklawn Drive frontage. At least two of these lines, nos. 14932 (underground) and 14935, because they mostly serve properties west of the CSX tracks, will be substantially altered and may be abandoned. This might simplify the infrastructure and open up opportunities for coordination. It could possibly free up conduit space in a way that could facilitate relocation of other existing lines underground.

Based on information that Pepco provided to the Maryland Public Service Commission, there will be a reduction in overhead exposure for 69,000 volt supply lines to the Kensington substation related to the White Flint substation project. Pepco's current overhead infrastructure along the applicant's frontage includes such overhead supply lines between the Parklawn and Kensington substations.

Also, a blanket statement that overhead wires cannot or should not be placed underground near a Pepco substation is inconsistent with recent projects and existing infrastructure. An example of a recent project in which an applicant successfully implemented the Planning Board's requirement for utility undergrounding is the Solera Modena Reserve senior living property on Metropolitan Avenue in Kensington. It is located directly across the street from Pepco's Kensington substation. Also, there are already underground lines running underneath Parklawn Drive in the vicinity such as Pepco feeder #14932.

Respectfully,

[redacted]
3904 Washington St
Kensington, MD 20895
[redacted]

# Town Center Boulevards – Prioritizing Street Design Features

Figure 2-34 provides a summary of Town Center Boulevard design features in four different categories and identifies what features are required, recommended, optional, and not permitted. The only design feature specifically not permitted for Town Center Boulevard are traffic diverters.

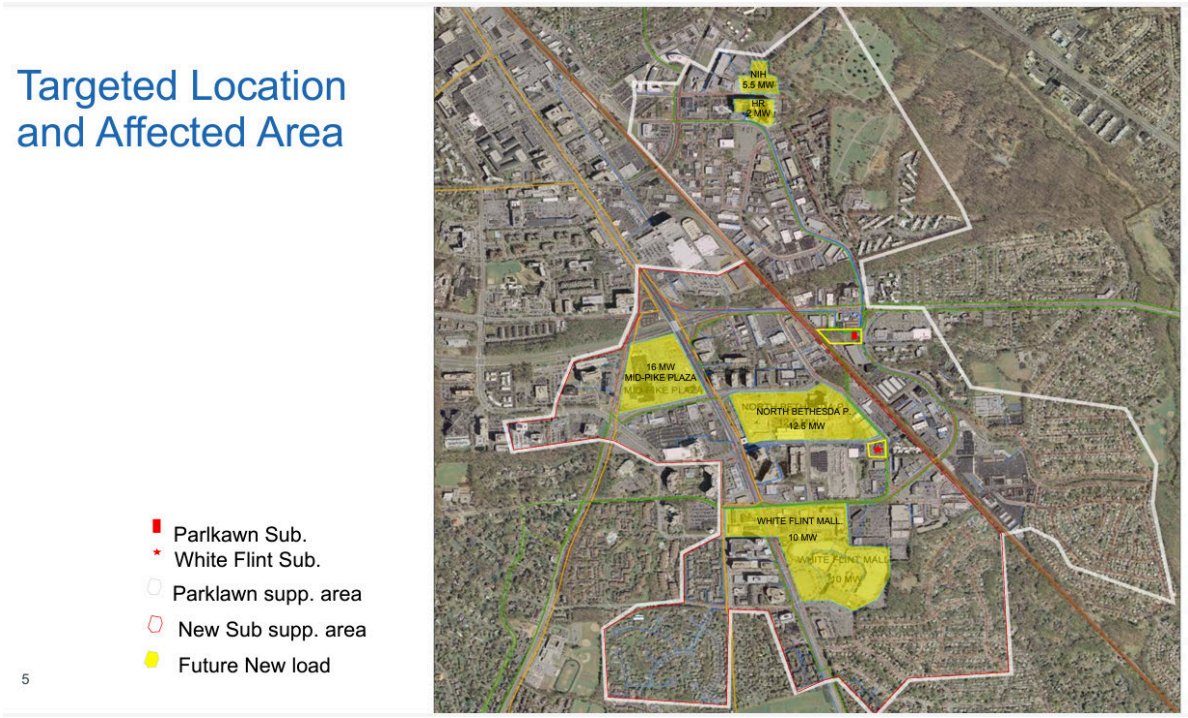
Figure 2-34. Street Design Features for Town Center Boulevards

| Legend | ■ Required<br>▲ Recommended (Context-Sensitive)<br>O Optional (Context-Sensitive)<br>X Not Permitted or N/A | * Unless determined otherwise by Planning Board<br>[1] Engineering judgement needed – see Chapter 6: Intersections for details | [2] Required at all intersections with existing or planned separated bike lanes, sidepaths, buffered bike lanes or conventional bike lanes.<br>[3] Narrowing lanes down to default dimensions for street type | Page Ref |
|---|---|---|---|---|
| ACTIVE ZONE | Trees/Landscaping in Buffer | | ■ | 254 |
| | Green Infrastructure/Rain Gardens | | ■ | 259 |
| | Seating | | ■ | 123 |
| | Bicycle Parking | | ■ | 124 |
| | Recycling/Trash Receptacles | | ▲ | 129 |
| | Plazas/Parklets | | O | 155 |
| | Bikeshare Stations/Dockless Parking Hubs (if in bikeshare/dockless service area) | | ▲ | 125 |
| | Pedestrian-Scale Lighting | | ■ | 142 |
| | Pedestrian/Bicycle Wayfinding | | ▲ | 133 |
| | Sidewalk-Level Driveways | | ■ | 141 |
| INTERSECTIONS | Roundabouts (Modern or Mini) | | O[1] | 220 |
| | Crossing Islands | | ▲ | 240 |
| | Pedestrian Signals (when traffic signals are present) or Beacons | | ■ | 237 |
| | Pedestrian Recall on Signals | | ▲ | 243 |
| | Pedestrian Lighting (unless pedestrians are prohibited, e.g., some Controlled Major Highways) | | ■ | 143 |
| | Protected Intersections, Bike Boxes, or Two-Stage Queue Boxes | | ■[2] | 224 |
| | Bicycle Markings/Facilities (when bikeways are present) | | ■ | 226 |
| SPEED MANAGEMENT | Lane Diet | | ▲[3] | 270 |
| | Road Diet (if volumes meet thresholds for road diet) | | O | 271 |
| | Speed Humps/Cushions | | O | 272 |
| | Speed Tables/Raised Crosswalks | | O | 273 |
| | Raised Intersections | | O | 273 |
| | Curb Extensions/Bulb Outs | | ▲ | 273 |
| | Neckdowns/Chokers | | ▲ | 274 |
| | Traffic Diverters | | X | 274 |
| | Chicanes/Roadway Curvature | | ▲ | 275 |
| | Textured Paving Treatment | | O | 276 |
| STREET ZONE | Green Infrastructure in Median (when median is present) | | ▲ | 259 |
| | Street Trees/Landscaping in Median (when median is present) | | ■ | 254 |
| | Minimize/Consolidate Driveways | | ■ | 141 |
| | Undergrounding Utilities (Master Plan recommendations supersede this guidance) | | ■* | 165 |
| | Transit Shelters (where transit routes are present and boarding thresholds are met) | | ▲ | 138 |
| | Loading/Pick-up and Drop-off Zones | | ▲ | 157 |
| | Accessible Parking | | O | 153 |
| | Carshare Parking | | ▲ | 154 |
| | E/V Charging Stations | | O | 154 |

**Affected Pepco Parklawn substation distribution feeder lines or in the vicinity**

| Feeder no. | Route | Crosses CSX |
|---|---|---|
| **14932** | **Parklawn Dr south underground** | **Yes** |
| **14934** | **Parklawn Dr north & south** | **No** |
| **14935** | **Parklawn Dr south, Nicholson** | **Yes** |
| 14937 | Randolph Rd, Old Georgetown | Yes |
| 14938 | Randolph Rd, Rockville Pike | Yes |
| 14940 | Randolph Rd, Montrose Rd | Yes |
| 14941 | Randolph Rd, Rockville Pike | Yes |
| **14942** | **Parklawn Dr south overhead, Nicholson, Randolph Hills** | **Yes** |

**Map of future service areas for Pepco's Parklawn and White Flint substations**
Outlined in white is the current Parklawn service area. After the White Flint substation project is completed, properties west of the CSX tracks will receive electricity from the new White Flint substation. Properties east of the CSX tracks will continue to be served by the Parklawn substation.




Source: Document on Pepco's project web page in July 2023 but since deleted

Excerpt from Pepco's 2024 filing with the Federal Energy Regulatory Commission (FERC)

| Name of Respondent: Potomac Electric Power Company | This report is: (1) ☑ An Original (2) ☐ A Resubmission | Date of Report: 12/31/2023 | Year/Period of Report End of: 2023/ Q4 |
|---|---|---|---|

**CONSTRUCTION WORK IN PROGRESS - - ELECTRIC (Account 107)**

1. Report below descriptions and balances at end of year of projects in process of construction (107).
2. Show items relating to "research, development, and demonstration" projects last, under a caption Research, Development, and Demonstrating (see Account 107 of the Uniform System of Accounts).
3. Minor projects (5% of the Balance End of the Year for Account 107 or $1,000,000, whichever is less) may be grouped.

| Line No. | Description of Project (a) | Construction work in progress - Electric (Account 107) (b) |
|---|---|---|
| 1 | Mt Vernon Sq Substation 230kV | 149,483,312 |
| 2 | White Flint New Substation 69kV | 105,722,947 |
| 3 | Mt Vernon Sq Substation Estab 230kv | 84,754,368 |
| 4 | Install 3 69kV Feeders from SI | 68,001,021 |
| 5 | Mt Vernon Sq Substation Estab 13kv | 55,017,358 |
| 6 | G STREET Substation 28 CONVERT 4KV | 37,966,235 |
| 7 | Harvard 230kV Supplies DC | 31,276,510 |
| 8 | WHITE FLINT Underground CIVIL RELATED | 28,368,614 |
| 9 | Benning Substation. 41 69kV GIS | 18,702,017 |
| 10 | WHITE FLINT Underground NEW SUPPLY LINE | 18,357,918 |
| 11 | 13 8kV Switchgear Replacement Pepco | 16,808,604 |
| 12 | L St Substation Capacity Expansion | 15,752,996 |
| 13 | PEPCO Tower Telecom | 13,657,016 |
| 14 | HRV Rebuild-13 kV HRV Re-Load | 13,016,256 |
| 15 | Takoma 230kV: Two 500 MVA Phase | 12,986,513 |
| 16 | Champlain New substation Transformer | 12,903,963 |
| 17 | HRV Rebuild-13kV Champlain Load | 12,606,790 |
| 18 | White Flint Area Substation Distribution | 12,213,952 |
| 19 | DC Plug Feeder 15009 | 11,155,577 |
| 20 | 13kV Distribution Cutovers I to F to L | 11,131,944 |
| 21 | Takoma 230kV HSB | 10,585,722 |
| 22 | Takoma OH UG 230kV Termination | 10,069,718 |
| 23 | SPCC Oil Breaker Replacement Substation Pepco MD | 10,047,589 |
| 24 | FEP PHYS SEC BUZZARD PT WALL | 9,839,521 |
| 25 | EU GIS CORE Switchgear | 9,374,323 |
| 26 | 64327: Pepco MD: Substation Improvement | 9,004,213 |
| 27 | Buzzard Contingency - Mbl GIS & Transformer | 8,615,925 |
| 28 | Replace 69kV Self Contained UG Supply | 8,227,356 |
| 29 | White Flint substation Construct | 7,858,052 |

Complete Streets Design Guide guidance on utility undergrounding

# Dry Utilities

Dry utilities such as electric, telephone, cable, and fiber-optic communications facilities should be installed in a separate Public Utility Easement (PUE) adjacent to the public right-of-way whenever feasible. However, in the case of Downtown and Town Center areas where zero building setbacks are allowed, dry utilities may be installed in the public right-of-way. When located in the public right-of-way, dry utilities should be located within the Frontage Zone and out of the Clear Zone, whenever feasible.

The preferred location of dry utilities is as follows, in order of priority:

- In alleys, private roads and privately-owned open space behind the buildings where access by utility maintenance vehicles is available;
- In the Frontage Zone;
- Under the sidewalk between the building and the street;
- Under the on-street parking lanes;
- Under a travel lane.

## Underground Conversion

General guidance on undergrounding utilities is shown in Figure 4-19. However, with the implementation of a Complete Streets framework, the development of a modified policy for the location and placement of utilities within county Rights-of-Way is needed. The Montgomery County Code[50] currently has regulations governing the conversion of aboveground utilities to underground locations (Chapter 49, Section 19) and the provision of underground utilities by development (Chapter 50, Section 4.3.I.1(a) & (b)). Specifically, streetscape guidelines in the urban areas of Montgomery County require the undergrounding of utilities and are currently enforced through the regulatory and permitting process by the M-NCPPC, DPS, and DOT. MCDOT also has general guidance on placement of "wet" versus "dry" utilities under the paved portion of the right-of-way (May 11, 2016 letter from MCDOT to the Planning Board)[51].

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50 https://codelibrary.amlegal.com/codes/montgomerycounty/latest/overview

51 https://www.montgomerycountymd.gov/dot-dir/Resources/Files/2016-Utilities-in-Public-ROW.pdf

Complete Streets Design Guide guidance on utility undergrounding



The intent of a modifled policy would be to strengthen and formalize this process to improve clarity on expectations on development applications and county and state agencies to provide underground utilities. A formalized countywide process should be implemented that provides a framework for implementation and enforcement. General guidance and policy on undergrounding utilities should be applied to in-street design and development projects county-wide; however, special consideration should be given to optional method development projects in the Commercial/ Residential and Employment Zones, if recommended in a Master or Sector Plan, streetscape guideline or design guideline, and on Downtown Boulevards and Downtown Streets.

In addition to modifying the policy to become countywide, a separate utility functional plan should be pursued by the county to address various utility issues including:

- Use of fee in lieu to fund future undergrounding by county;
- Consolidation of utilities;
- Relocation of utilities;
- Conduit installation in place of utility relocation;
- Width requirements for each utility within the right-of-way; and
- Placement of utilities in designated alleys to avoid conflicts with narrower rights-of-way.

**LEGEND**

- ■ Required
- ▲ Recommended (Context-Sensitive)
- O Optional (Context-Sensitive)
- X Not Permitted or N/A
- * Unless determined otherwise by Planning Board

| | Downtown Boulevard | Downtown Street | Town Center Boulevard | Town Center Street | Boulevard | Area Connector | Neighborhood Connector | Neighborhood Street | Neighborhood Yield Street | Industrial Street | Country Connector | Country Road | Controlled Major Highway |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Undergrounding Utilities** (unless otherwise specifled in a Master Plan) | ■ | ■ | ■* | ■* | O | O | O | O | O | O | O | O | O |

Figure 4-19. Guidance on underground conversion by street type (does not supersede above requirements)

Massive new Pepco overhead metal pole infrastructure recently installed on Parklawn Drive and Randolph Rd for the White Flint substation project

New metal utility poles on Parklawn Drive

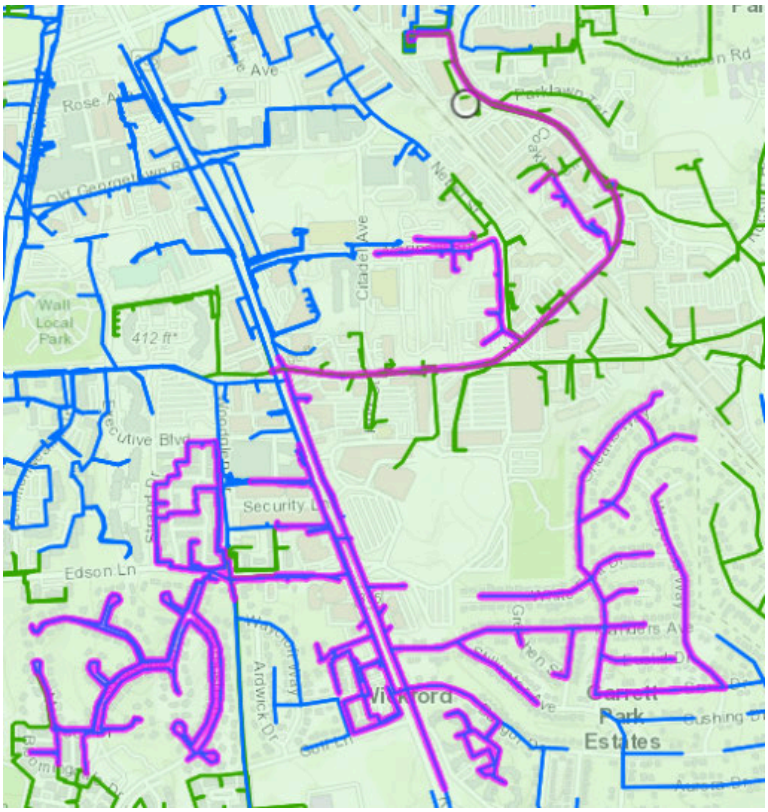

New metal utility pole on Randolph Rd

Recent precedent of undergrounding near Pepco's Kensington substation

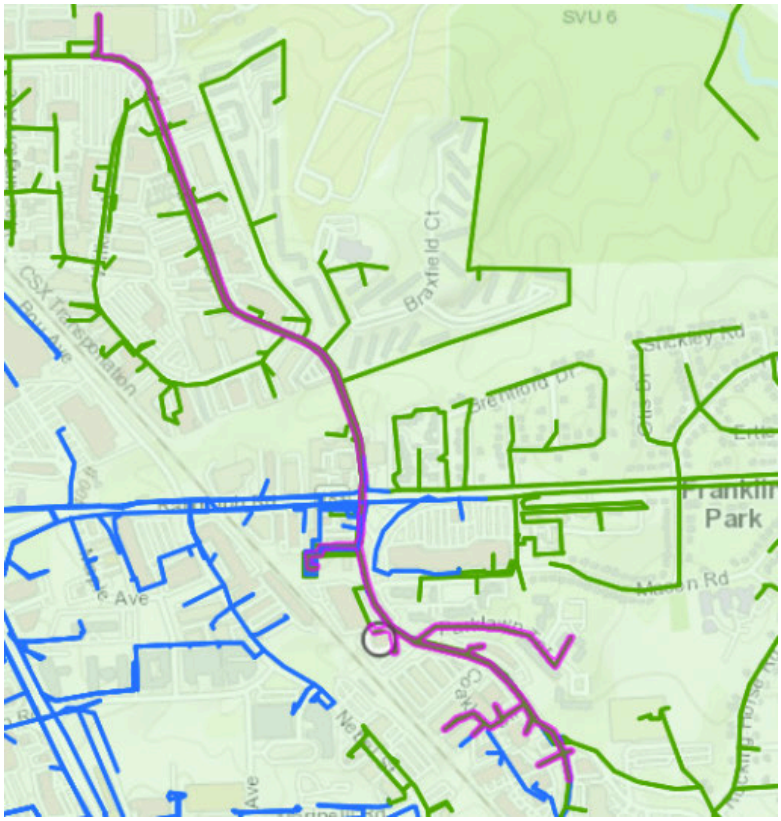

December 2024


October 2019

Pepco distribution feeder lines that run along Parklawn Drive frontage

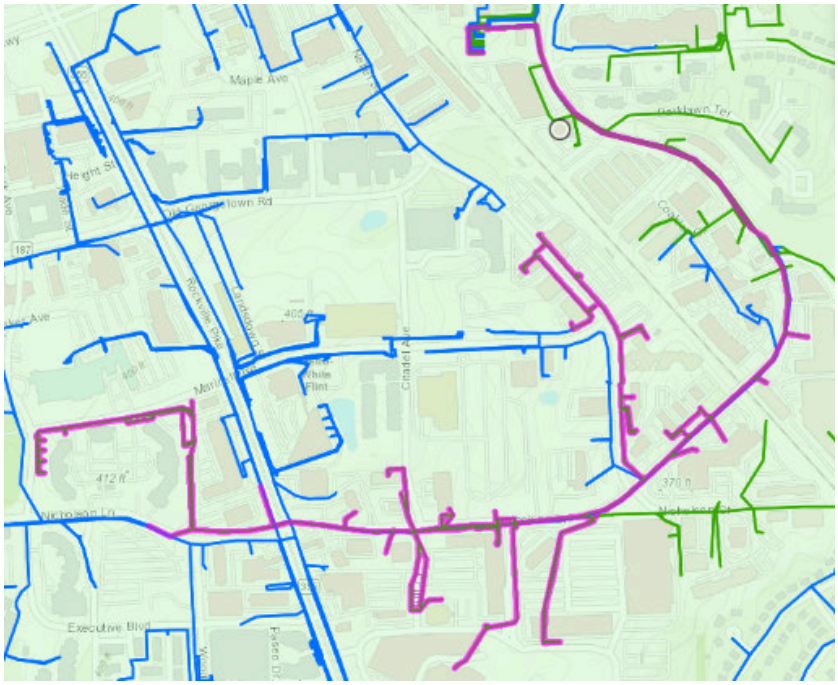



Pepco Distribution Feeder line no 14932 (crosses CSX)

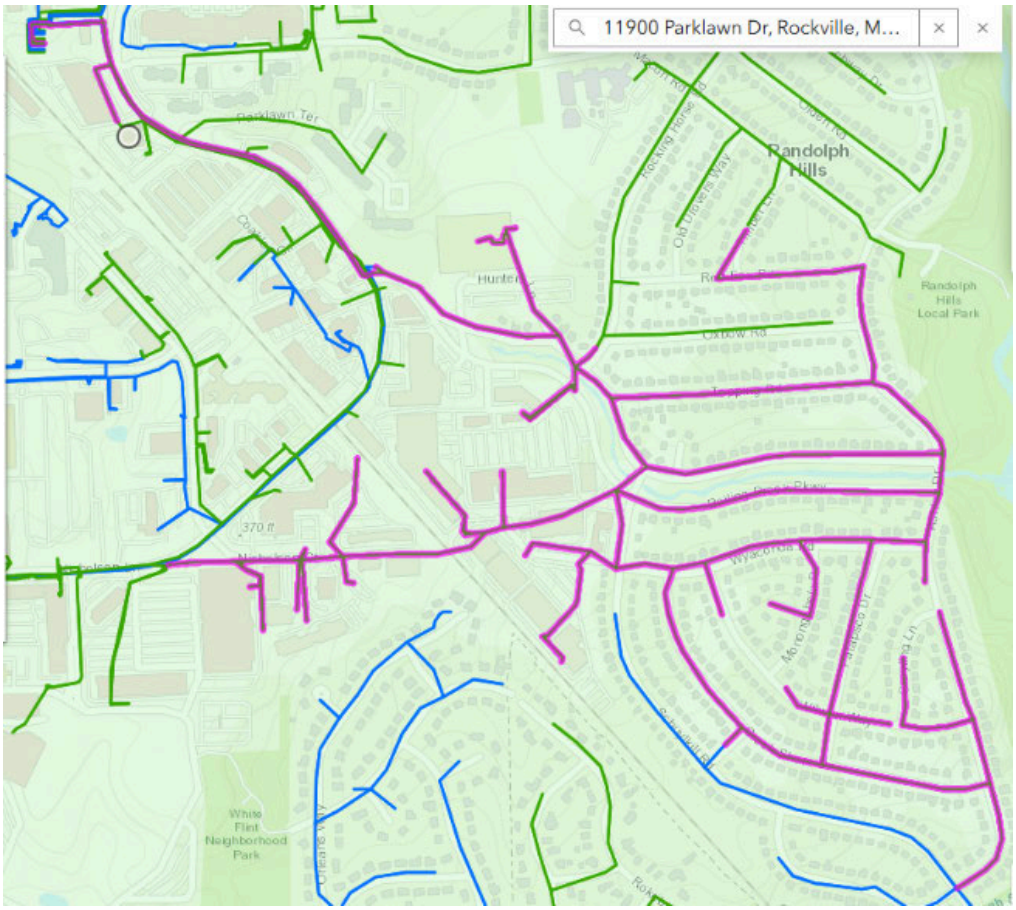



Pepco Distribution Feeder line no 14932 (does not cross CSX)

Pepco distribution feeder lines that run along Parklawn Drive frontage




Pepco Distribution Feeder line no 14935 (crosses CSX)




Pepco Distribution Feeder line no 14942 (crosses CSX)