



Rock Spring Master Plan Public Hearing Draft: Worksession 2

Nancy Sturgeon, Master Planner Supervisor, Master Plan Team, Area 2 Division, Nancy.Sturgeon@montgomeryplanning.org, 301-495-1308

Luis R. Estrada Cepero, Planner Coordinator, Urban Designer, Area 2 Division, Luis.Estrada@montgomeryplanning.org, 301-495-4641

Khalid Afzal, Acting Chief, Area 2 Division, Khalid.Afzal@montgomeryplanning.org, 301-495-4650

Completed: 1-12-17

Summary

The Planning Board's public hearing on the Rock Spring Master Plan was held on December 1, 2016 and the public hearing record was open until the close of business on December 15, 2016. The Board's first worksession on the Plan was held on December 15, 2016. The second Planning Board worksession will be on January 19, 2017.

As requested by the Planning Board at the end of the first worksession, staff will present options for how several properties in Rock Spring could redevelop. These options will be presented for discussion purposes as the Board considers the property owner's zoning requests. The written public hearing testimony is summarized in Attachment 1. All of the written testimony received as part of the public hearing record is attached, including technical comments from the Departments of Transportation, Environmental Protection, and Recreation, which will be addressed at a future worksession, as needed.

Rock Spring Master Plan worksession schedule:

December 15, 2016	Planning Board Worksession #1
January 19, 2017	Planning Board Worksession #2
February 2, 2017	Planning Board Worksession #3
February 16, 2017	Planning Board Worksession #4, if needed
March 2, 2017	Planning Board Worksession #5, if needed

The Planning Board should bring their copies of the Public Hearing Draft that were previously distributed to them.

Attachments:

1. Summary of Written Public Hearing Testimony
2. Written Testimony

Attachment 1 Rock Spring Master Plan: Summary of Written Public Hearing Testimony

	Issue/Property	Page	Testimony or Comment	Staff Response	Planning Board Direction
1.	Walter Johnson Cluster	26, 41-44	<p>Agree with Plan's suggestion for possible school on Rock Spring Centre or Marriott sites, but must reserve now unless a suitable site is reserved elsewhere. Board should delay this Plan and White Flint 2 until sites for two elementary schools and one middle school are identified/reserved and/or the County has means to acquire. Opposed to proposed road between WJHS and Georgetown Square.</p> <p><i>Wendy Calhoun, Cluster Coordinator</i></p>	<p>MCPS continues to work on options to address school capacity issues in the Walter Johnson Cluster. The recommendations in the Master Plan are as specific as staff feels is appropriate for a long-range plan.</p> <p>The area needs greater connectivity and the proposed road between Democracy Boulevard and Rock Spring Drive would assist pedestrians and bicyclists.</p>	
2.	Democracy Center 6901 Rockledge Drive	30, 49	<p>Requests CRT zone through the Master Plan (not via a future floating zone application) or amend the EOF zone to permit any mix of uses approved by the Board at site plan.</p> <p>Objects to Plan's recommendations that existing private open space be open to the public and requests removal of this language. If the Parks Department wants to acquire the open space, the site should be given mixed use zoning with a higher density for the developable land.</p> <p><i>Francoise M. Carrier</i></p>	<p>Existing Zoning: EOF-1.25, H-150 ¹PH Draft Zoning: EOF-1.5, H-150 Owner's Request: CRT or modified EOF zone</p> <p>Staff will present options for the Board to discuss and consider during the worksessions.</p> <p>Staff understands the objection of the property owner to having its private property open to the public, which is why staff is interested in acquiring the open space for public use as a public park.</p>	

¹PH = Rock Spring Public Hearing Draft Master Plan

Attachment 1 Rock Spring Master Plan: Summary of Written Public Hearing Testimony

	Issue/Property	Page	Testimony or Comment	Staff Response	Planning Board Direction
3.	Camalier Davis Properties - Rock Spring Centre	26, 28, 50	To achieve property owner's vision, density should be 2.0 FAR. Plan's suggestion that Rock Spring Centre site could provide possible school site or recreation/open space, if the approved plan were amended, is extremely problematic and will hinder site's marketability. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: CR-1.5, C-0.75, R-0.75, H-275 PH Draft Zoning: CR-1.5, C-0.75, R-0.75, H-275 Owner's Request: CR-2.0, C-1.5, R-1.5, H-275 Staff continues to support the Draft Plan's proposed zoning recommendation for this property and the suggestion that a school site be considered if the approved plan were amended.	
4.	Camalier Davis Properties - Georgetown Square	25	Densities and heights need to be significant to encourage redevelopment at this gateway location. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: NR-0.75, H-45 PH Draft Zoning: CRT-1.25, C-0.75, R-0.75, H-75 Owner's Request: CRT-2.0, C-1.5, R-1.5, H-80 Staff continues to support the Draft Plan's proposed zoning recommendation for this property.	
5.	Camalier Davis Properties - Rockledge Executive Plaza One (6600 Rockledge Drive) and Two (6610 Rockledge Drive)	29-31	Increase density to 2.5 FAR and height to 275 feet to provide incentive to redevelop. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: EOF-1.0, H-100 PH Draft Zoning: EOF-1.5, H-100 Owner's Request: CR-2.5, C-2.0, R-2.0, H-275 Staff will present options for the Board to discuss and consider during the worksessions.	
6.	Camalier Davis Properties - Rock Spring North: 6500, 6550, 6560 Rock Spring Drive; 6430 Rockledge Drive	29-31	Increase density to 2.5 FAR and height to 225 feet to provide incentive to redevelop; these densities and heights are appropriate and compatible with the surrounding area. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: EOF-1.0, 1.25, 1.5; H-100 PH Draft Zoning: EOF-1.5, H-100 Owner's Request: CR-2.5, C-2.0, R-2.0, H-225 Staff will present options for the Board to discuss and consider during the worksessions.	

Attachment 1 Rock Spring Master Plan: Summary of Written Public Hearing Testimony

	Issue/Property	Page	Testimony or Comment	Staff Response	Planning Board Direction
7.	Camalier Davis Properties - Rock Spring South: 10215 Fernwood Road; 6410, 6420 Rockledge Drive	29-31	Increase density to 2.5 FAR and height to 150 to provide incentive to redevelop. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: EOF-1.0, H-100 PH Draft Zoning: EOF-1.5, H-100 Owner's Request: CR-2.5, C-2.0, R-2.0, H-150 Staff will present options for the Board to discuss and consider during the worksessions.	
8.	Camalier Davis Properties - Democracy Plaza One and Two and Marriott Suites Hotel: 6701, 6707, 6711 Democracy Blvd.	29-31	Increase density to 2.5 FAR and height to 150 to provide incentive to redevelop. <i>Steven A. Robins and Patrick L. O'Neil</i>	Existing Zoning: EOF-1.0, H-110 PH Draft Zoning: EOF-1.5, H-110 Owner's Request: CR-2.5, C-2.0, R-2.0, H-150 Staff will present options for the Board to discuss and consider during the worksessions.	
9.	Marriott Property 10400 Fernwood Road	20, 21, 30, 31, 42	Allowable uses for non-office commercial and residential uses need to be expanded, by either modifying the EOF zone or rezoning to CR zone. Allowable height should be increased from 100' to 150'. Property should not be recommended for school site consideration. <i>Nancy Regelin and David D. Freishtat</i>	Existing Zoning: EOF-0.75, H-100 Proposed Zoning: EOF-1.5, H-100 Owner's Request: Modified EOF zone or CR 1.5, C-1.5, R-1.0, H-150 Staff will present options for the Board to discuss and consider during the worksessions. Staff believes that the feasibility of a new school, on some portion of the site, when it redevelops, should be considered.	
10.	Westfield Montgomery Mall	33	Westfield supports the existing zoning, but proposes a zoning text amendment for the Regional Shopping Center Overlay Zone to allow multi-family residential uses at a maximum building height of 150 feet to accommodate future interest in adding housing, as permitted by the GR zone. <i>Patricia Harris</i>	Existing Zoning: GR-1.5, H-45 PH Draft Zoning: GR-1.5, H-45 Owner's Request: Supports the Plan's zoning recommendation, with a requested zoning text amendment for the Regional Shopping Center Overlay Zone. Staff supports the requested zoning text amendment.	

Attachment 1 Rock Spring Master Plan: Summary of Written Public Hearing Testimony

	Issue/Property	Page	Testimony or Comment	Staff Response	Planning Board Direction
11.	Wildwood Shopping Center 10233 Old Georgetown Road	25	Owners of the shopping center, Federal Realty Investment Trust, support the Draft Plan's zoning recommendation for the site. The Plan appropriately recommends the same zoning for the adjacent property to the north, but the owner, Aubinoe, has requested 65 feet. If the Board increases the Aubinoe height to 65 feet, Federal requests 65 feet as well. <i>Patricia Harris</i>	Existing Zoning: NR-0.75, H-45 PH Draft Zoning: CRT-1.25, C-0.75, R-0.75, H-50 Owner's Request: Supports the Plan's zoning recommendation, but requests 65 feet in height if adjacent property owner's request for 65 feet is granted. Aubinoe requested 56 feet, not 65. Staff does not support height above 50 feet at this location.	
12.	Aubinoe/Wildwood Medical Center 10405 Old Georgetown Road	24-28	The property owner, Mr. Aubinoe, has a pending local map amendment application that seeks to remove binding elements to provide more flexibility in the mix of uses. The 50 foot height limit proposed by the Draft Plan is a significant constraint and a minimum of 56 feet is requested. <i>Soo Lee-Cho</i>	Existing Zoning: CRT-1.25, C-0.5, R-0.75, H-50 PH Draft Zoning: CRT-1.25, C-0.5, R-0.75, H-50 Owner's Request: CRT-1.25, C-0.5, R-0.75, H-56 Staff does not support height above 50 feet at this location.	
13.	Pedestrian and Bicycle safety	62-66	Area needs wider sidewalks, medians, perhaps overpasses so residents can safely walk and bike to the nearby shops. <i>David O'Connor</i>	Staff agrees that this is an extremely important issue, which is specifically addressed on pages 62-66, and throughout the Plan.	

Attachment 2

December 1, 2016

WJ Cluster Testimony to the Planning Board

Presented by Wendy Calhoun, Cluster Coordinator

Good evening and thank you for taking the time to listen to the concerns the Walter Johnson Cluster has with the Rock Spring Master Plan. We see many of our issues reflected in your hearing draft, and that's a great first step toward resolving them.

Schools in the Cluster are already bursting at the seams, and the development occurring within our cluster is unprecedented. This means there isn't much land available for public infrastructure to meet the demands created by these new developments, such as schools to accommodate the added population of students. There is also a great deal of turnover naturally occurring within the Walter Johnson Cluster communities. As older residents move away, families with school-aged children are moving in. We are told this turnover has brought much of the overcrowding in our cluster to date.

The current schools can only be added onto so many times before they compromise the education, well-being and security of our children. I believe we've reached that point of diminishing return. As it currently stands, once the planned additions and rev/exes to Ashburton ES, Kensington-Parkwood ES, and Luxmanor ES are complete by 2020, all six elementary schools in our cluster will be at or above the MCPS recommended school size (and all will be above the recommendation in a study completed by the State of Maryland – see Appendix A).

According to numbers thoughtfully prepared by MCPS for the Walter Johnson Roundtable and the CIP, our cluster is projected to have 5500 students by 2046 – about the time this plan will end. We believe the numbers of developments approved or in the pipeline (see Appendix B) – including this plan and the White Flint 2 plan – will warrant the need for both a seventh and eighth Elementary School.

We wholeheartedly agree with the two Elementary School sites suggested by the Planning staff, Rock Spring Centre or the Marriott site. We're very pleased that you've suggested these sites. However, the hearing draft only encourages discussing use of the sites in the future. We need you to go further – reserving a school site before this plan passes – unless we know in advance that a suitable site is reserved in another plan or development. Sites in WMAL, White Flint Sector Plan or White Flint 2 Sector Plans would also be usable, if large enough for a fully equipped, educationally appropriate school.

You suggest meeting elementary school needs by reopening a closed school. The school board has requested the site selection process for a seventh Elementary School begin in 2017-2018. That process will clarify whether there are any sites in our cluster – either closed school sites or reserved sites - that are suitable for an additional school. Since we will not know that answer soon, for now we can only say – it's not clear that any are suitable.

We oppose reassignment of those in our cluster to neighboring clusters for Elementary School. The County on occasion needs to adjust school boundaries, but should not do this instead of finding adequate facilities (and land for those facilities) as part of the planning process. Boundary changes

should be done as a last resort – and decisions about moving school communities are best addressed through careful MCPS processes, which involve significant community input.

The WJ middle schools are in a similar situation to the Elementary Schools, as North Bethesda MS has a planned addition and Tilden MS has a new building in the CIP. By 2020, both middle schools will be built to 1200, and we strongly believe that both North Bethesda and Tilden Middle Schools should NOT be built above the MCPS Middle School preferred maximum of 1200, and oppose building these schools out to 1500.

MCPS projections for the Roundtable – as well as the projections for this plan, the White Flint 2 plan, and WMAL – demonstrate that our cluster will have more than 500 additional middle school students by 2046 (about the end of the 2 plans). We strongly believe a third middle school is needed in the WJ cluster (again, see Appendix B). We commend you for suggesting the Wilgus property in the hearing draft. That, or the Marriott site seem appropriate and viable to the cluster and potentially the Rock Spring Center property. We urge you to move forward – by reserving a middle school site in either this plan or the White Flint 2 plan – before either plan passes.

We do oppose reassignment of those in our cluster to neighboring clusters for Middle School, for the reasons stated earlier.

The Board of Education has voted to confirm the intent to reopen Woodward High School for the purposes of relieving overcrowding at Walter Johnson, so it would seem they too agree that building schools above the state and MCPS recommended sizes is not a good idea

The cluster has comments about the plan's proposals for land adjacent to Walter Johnson High School. We deeply appreciate your recommendation to add field space for Walter Johnson HS. We totally agree that "additional recreational open space is needed in the area to serve the unmet needs of . . . the high school". We note gratefully your idea that the Parks staff and Planning staff work with the Rock Spring Centre owner, if the opportunity arises, to create recreational public open space on this site. We note your suggestion that MCPS try to buy or lease parking space for a field, but cannot imagine that is affordable. We would like to learn more about your suggestion for a greenway and walking trail "along the existing tributary that starts on the Walter Johnson High School property".

We were surprised to discover your recommendation for a new two-lane north-south public street between the Georgetown Square shopping center and Walter Johnson High School, if the shopping center redevelops. This seems inconsistent with your frequently stated goal of advancing a more pedestrian and bicyclist friendly area. In fact, the cluster has significant concerns about the safety of our students and pedestrians, if that street is built. We have already had two WJHS students hit on their bikes this year. Perhaps pedestrian walkways or overpasses would be needed. Also, we wonder about the impact of that street on the WJHS drop-off/pickup area. By contrast, we thank you for your comments about safe and prominent pedestrian crossings at other locations by WJHS, such as at Rock Spring Drive between Walter Johnson High School and the future Rock Spring Centre development.

The cumulative projected impact of developments approved or about to be approved in the Walter Johnson Cluster (including projections for this plan, the White Flint 2 plan, and WMAL), includes dwellings that will yield 1602 new elementary school students, 915 new middle school students and 940 new high school students. This total of 3,457 does not include all of the "organic" increase in student population which occurs when homes for empty nesters get sold to families with children. The sheer magnitude of students we will receive from development - 3457 students – demonstrates the need for new schools in our cluster.

As large as those growth numbers are, I think it has more impact to put them in perspective of a percentage increase above current student populations. The 1602 new elementary students is a 37% increase above current, the 915 new middle schoolers is a 47% increase, and the 940 new high school students is a 40% increase.

With new students organically being added by housing turnover in existing neighborhoods PLUS the 3,457 new students from the cumulative impact of developments approved and about to be approved, it is crystal clear what the only viable solution is: The Planning Department must act now to ensure there is land identified and reserved for new schools in the White Flint 2 Sector and Rock Spring Master Plans to offset the impact of those students who will live in the new housing units considered by the Board.

To meet the needs of the coming 3,457 new students, and students from housing turnover, the Walter Johnson cluster will need at least 2 elementary schools and a middle school. We ask you to delay approval of this plan, as well as the White Flint 2 plan, until you find land for those 2 elementary schools and a middle school, and the County has a plan for acquiring it.

Thank you for your consideration.

Appendix A

Current Walter Johnson Cluster Elementary Schools

MCPS Maximum suggested capacity for an Elementary School is 740

	Current Capacity	2020 Capacity
• Ashburton ES:	651	770
• Farmland ES:	714	714
• Garrett Park ES:	776	776
• Kensington-Parkwood ES:	472	746
• Luxmanor ES:	411	758
• Wyngate ES:	777	777

Appendix B

Cumulative Projected Impact of Developments Approved in Walter Johnson Cluster

	Elementary	Middle	High
Total 2000- Present:	1098	696	676
<u>WMAL/Rock Sp/Wh Fl 2</u>			
WMAL	Expect Soon	195 SFHs, 135 TH units/DXs (MNCPPC)	
Rock Spring MP (scenario 3):	Expect 2017	239 TH units, 2149 HR units	
White Flint 2 SP (scenario 3):	Expect 2017	492 TH units, 4428 HR units	
SFH units (195) .323, .132, .154	63	32	30
TH/DX units (866) .144, .064, .073	125	55	63
MR/HR units (6577) .048, .020, .026	316	132	171
WMAL/Rock Sp/Wh Fl2 Subtotals	504	219	264
<hr/>			
Total with WMAL/Rock Sp/Wh Fl 2:	1602	915	940

School Needs During Life of Plans

	Elementary	Middle	High
Roundtable 30-Year Projections	5500	2750	3500
Rock Sp/Wh Fl 2 (scenario 3)	<u>420</u>	<u>180</u>	<u>225</u>
Not included: Other 30-year development, turnover, students welcomed from other clusters			
Subtotal	5920	2930	3725
CIP Plan Capacity	4500-4631 <u>(guideline max)</u>	2429 <u>(guideline max)</u>	2335 <u>(until solution)</u>
Deficit	1289-1420	501	1390
Needed	2 schools	1 school	HS solution
Closed Schools	Questionable¹	No	Yes, but plans mention for other clusters
Other Schools	WF South shrank WMAL considered		

¹ 2 sites are very small, at 3.08 and 3.53 acres. 2 sites are schools – there's no net gain of land if they are moved. 1 site is both small, at 4.54 acres, and requires moving the HOC to separate space – perhaps no net gain of resources if it is moved. The MCPS Chief Operating Officer estimates a cost of \$28-35,000,000 to reopen a closed elementary school to meet Code requirements and MCPS standards. That would mean no savings over new construction. No feasibility studies have been done on any site.

Methodology:

Dates in the first chart come from MNCPPC and Rockville planning records.

Units are figures used by Bruce Crispell, MCPS Division of Long-Range Planning in developing the enrollment figures for the Capital Improvement Program (CIP), except as otherwise noted.

Student generation rates are the rates provided by MCPS and MNCPPC. Rates used for 2000-03 are the 2004-05 student generation rates. I was unable to obtain the 2000-03 generation rates.

Date: June 20, 2016

Liz King, on behalf of the Walter Johnson Cluster of PTAs

Montgomery County Planning Board Public Hearing
Rock Spring Master Plan
December 1, 2016
Testimony of Françoise M. Carrier on behalf of
Democracy Associates Limited Partnership

Good afternoon Chair Anderson and members of the Planning Board. For the record, I am Françoise Carrier. I am testifying on behalf of Democracy Associates Limited Partnership, owner of approximately 15 acres of land in the Rock Spring office park. The property is known as Democracy Center and is developed with three office buildings around a plaza, a small amount of surface parking supplementing 1,400 underground parking spaces, and a large, landscaped green area with a walking path and a basketball court.

I'm sure you are aware of the high vacancy rates in the Rock Spring office park. The long-term prospects for the office park are not viable under current conditions, lacking the transit access and mixed-use amenities that office tenants today find desirable. This master plan was undertaken principally to respond to this precarious situation. The vision set out in the current draft includes promoting greater amenity options and more of a mix of uses. However, the draft does not provide the zoning that would most effectively support this vision.

The draft plan recommends leaving almost the entire Rock Spring office park in the EOF zone, which is primarily an employment zone. The draft does two things to try and promote more amenities and a greater mix of uses in the office park: it recommends a change in the EOF zone to provide more use flexibility, and it states that nearly all of the office park properties could be considered for rezoning to a mixed-use floating zone. These are positive steps, but in our view, they are not enough. The recommended change in the EOF zone increases flexibility, but it still artificially constrains the property owner's ability to respond to the market. Similarly, a recommendation for a mixed-use floating zone is helpful because it makes it more likely that a future rezoning application will be approved, but it places an extra layer of time-consuming and costly process in the way of mixed-use development.

The fundamental question is whether this plan will apply zoning that will support mixed-use development, knowing that the plan will not be amended again for at least 20 years. Democracy Associates requests one of two approaches: either rezone its property to the CRT zone, or amend the EOF zone to permit any mix of uses approved by the Planning Board at site plan, provided that the applicable master plan recommends mixed-use development.

In addition to zoning issues, Democracy Associates is concerned about the draft plan's recommendations for its large green space. The plan states "... if the owner concurred, the Plan would encourage public access to this open space given the nearby residential development under construction at the EYA property; it is anticipated that residents may use this open space for recreation and dog walking." Democracy Associates incurred the expense of undergrounding most of its parking to create a private open space that serves as an important amenity for its office tenants. It is inappropriate

for a county master plan to suggest that one property owner should make its private open space open to the public to benefit another private development. We request removal from the plan of all references to this private open space being made open to the public, and in particular the plan's implied endorsement of its use by residents of the nearby townhouse development.

The draft plan also recommends that if the property redevelops, the open space should be acquired by the Parks Department. If this possibility is of interest to the Planning Board, we would suggest discussion at a future work session of providing mixed use zoning for this property, with a higher density for the developable land in the event that the open space is dedicated to park use.

Thank you very much. We look forward to working with you and your staff as the plan moves forward.



Attorneys at Law

3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
www.lerchearly.com

Steven A. Robins

Tel. (301) 657-0747
Fax (301) 347-1778
sarobins@lerchearly.com

December 13, 2016

The Honorable Casey Anderson and
Members of the Montgomery County Planning Board
Maryland-National Capital Park & Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re: Rock Spring Sector Plan/Camalier Davis Properties

Dear Chairman Anderson and Members of the Montgomery County Planning Board:

Our firm represents the Camalier and Davis families and their related ownership entities regarding properties they own in the Rock Spring Sector Plan planning area. Please place this testimony in the public record for the pending Rock Spring Sector Plan. This testimony expands on our presentation at the Public Hearing held on December 1, 2016. A copy of that Power Point presentation is attached to this letter. Our firm has been representing the families and their ownership entities for many years on the various properties they own in this part of the County and most recently on the approved Rock Spring Centre project that is slated for development in the near future. As part of our efforts to represent the families, we are working closely with Vika, SS Governmental Relations and Wells and Associates. We are excited about participating in the Rock Spring Sector Plan process and hope that the end result is one that repositions and reinvigorates Rock Spring.

The Rock Spring area was developed in the late 1960's and early 1970's as a campus style suburban office park with extensive setbacks, green lawns and lush landscaping. The concept quickly attracted major corporations and became known as one of the east coast's premier office parks and employment centers. At one point, Rock Spring was home to more fortune 500 Companies than any other location in the State of Maryland. Since that time, the area has been on the decline with significant office vacancy rates and the lack of 24/7 type of activity.

As reported as part of the Urban Land Institute's Technical Assistance Panel on Rock Spring held on December 1 -2, 2015 (What's Next for Office Parks in Montgomery County?) and the Office Market Working Group assembled by County Executive Leggett, the Suburban office park concept is no longer "in vogue" and vacancy rates in Rock Spring have climbed to 22%, among the highest in the County. The old concept of enhancing corporate images with stand-alone, unrelated buildings has been replaced by the energy a more urban, mixed use environment provides. The time has come to move this 1970's Suburban office park into the 21st century by expanding on the 1992 North Bethesda Master Plan's Urban Village concept.

The sector planning effort began with a promise of substantive goals to "Re-imagine Rock Spring", but the current draft falls short of these goals.¹ The Draft Plan does not facilitate the vision of creating a re-imagined Rock Spring and, in fact, cuts against it with many of its recommendations. Leaving zoning and densities essentially unchanged with little flexibility is not going to spur the development or redevelopment that is necessary to create the 24/7 environment envisioned by the Urban Village Concept - it is essentially maintaining the status quo that certainly could not be the goal of this sector planning exercise. CR zones, with maximum flexibility between the "C" and "R" components, are needed to spur the mix of uses that are imperative to revitalizing Rock Spring. The ULI's report states,

"The Panel further recommended that the County be flexible in the uses for the site by eliminating zoning constraints." Panelists also recommended that 'the market should create the mix,' and stated that the market—not arbitrary zoning requirements — should be the determining factor of the mix of uses that arrive on the site."

A successful Plan should provide incentives to redevelop and create a sense of place.²

¹ The Sector Plan efforts were branded by Planning Staff as "Re-imagining Rock Spring." See www.montgomeryplanning.org/planning/communities/area-2/rock-spring.

² The Office Market Working Group concluded that the single-use, suburban office park model is out of date and is a drag on the County's office market. The Work Group identified this issue as a priority and indicated that it should be addressed by encouraging additional retail (possibly through a density bonus) that could stimulate the conversion

It generally is recognized that Rock Spring Centre is the pivotal property anchoring the Urban Village concept – again, this has been specifically recognized by the ULI panel of experts, the Office Market Working Group and also by Technical Staff. We are working diligently to get the various portions of the Rock Spring Centre development underway, particularly the retail, hotel and remaining residential. The Camalier and Davis families had difficulty in launching this project in the past due to Canyon Ranch falling through, living through one of the worst economic recessions in recent history, and the challenge in finding the right anchors to create the Urban Village concept. They had multiple equity investment partners commit and then withdraw at one level or another only to have to begin anew. Efforts to engage and thereafter seek a commitment from an equity partner is extremely time consuming; however, we now are confident that the families are very close to launching the project that will turn at least a significant component of Rock Spring Centre into a reality. The approved office for the project remains stalled and we do not see an immediate user for that space. But, with added flexibility through the Sector Plan, we envision an opportunity where other types of commercial uses, including, but not limited to, increased retail and restaurant uses, could be a welcomed addition to the mix. This is something that likely could not occur today because of the density caps set forth in the existing Sector Plan and in the MXPD zoned approval.³ We respectfully request that the Draft Sector Plan provide for the zoning flexibility discussed herein and express unequivocal support for the Rock Spring Centre effort. Notably, the Sector Plan should not saddle the development with recommendations that would discourage and likely set back this very important development opportunity for the Rock Spring community and the County as a whole.⁴

To support redevelopment, the Camalier and Davis families already have made major public investments that are in place in the area well before moving

of the ground floor of office buildings, providing as much flexibility in uses and zoning standards as possible and creating new identities for these communities in the market place.

³ The existing Sector Plan for Rock Spring and the MXPD zone, which govern the existing Rock Spring Centre approval, caps the amount of residential and retail uses permitted on the site. This is a very real impediment to the project.

⁴ For example, weaving in suggestions for the Property as a possible location for a school site if the approved plan were amended or providing additional recreational opportunities and open space above and beyond those already approved would create a significant cloud on the Property and a very real impediment to its ultimate development.

forward with private construction. These significant improvements by the Camalier Davis entities include the following lettered items, which correspond to the letter on the below graphic:

- A. Construction of west-bound left turn lane on Tuckerman Lane at its intersection with Old Georgetown Road.
- B. Dedication and contribution of \$1,500,000 toward the construction of the Rockledge Connector Interchange with I-270 & dedication of SWM area for SHA improvements.
- C. Dedication and construction of the realignment of Rockledge Drive to connect with the Rockledge Connector interchange.
- D. Dedication of Recreation Parcel M along Old Georgetown Road.
- E. Dedication and construction of widening of Old Georgetown Road to remove northbound "trap lane" and add northbound left turn lanes at Democracy Blvd and Rock Spring Drive.
- F. Dedication of park area on the south side of Democracy Boulevard.
- G. Dedication of the Davis Library site.
- H. Dedication and construction of Fernwood Road, Rockledge Drive, and Rock Spring Drive.
- I. Major financial contributions for construction of Fernwood Road/Westlake Terrace Bridge over I-270.
- J. Conveyance of School Site for Walter Johnson High School.

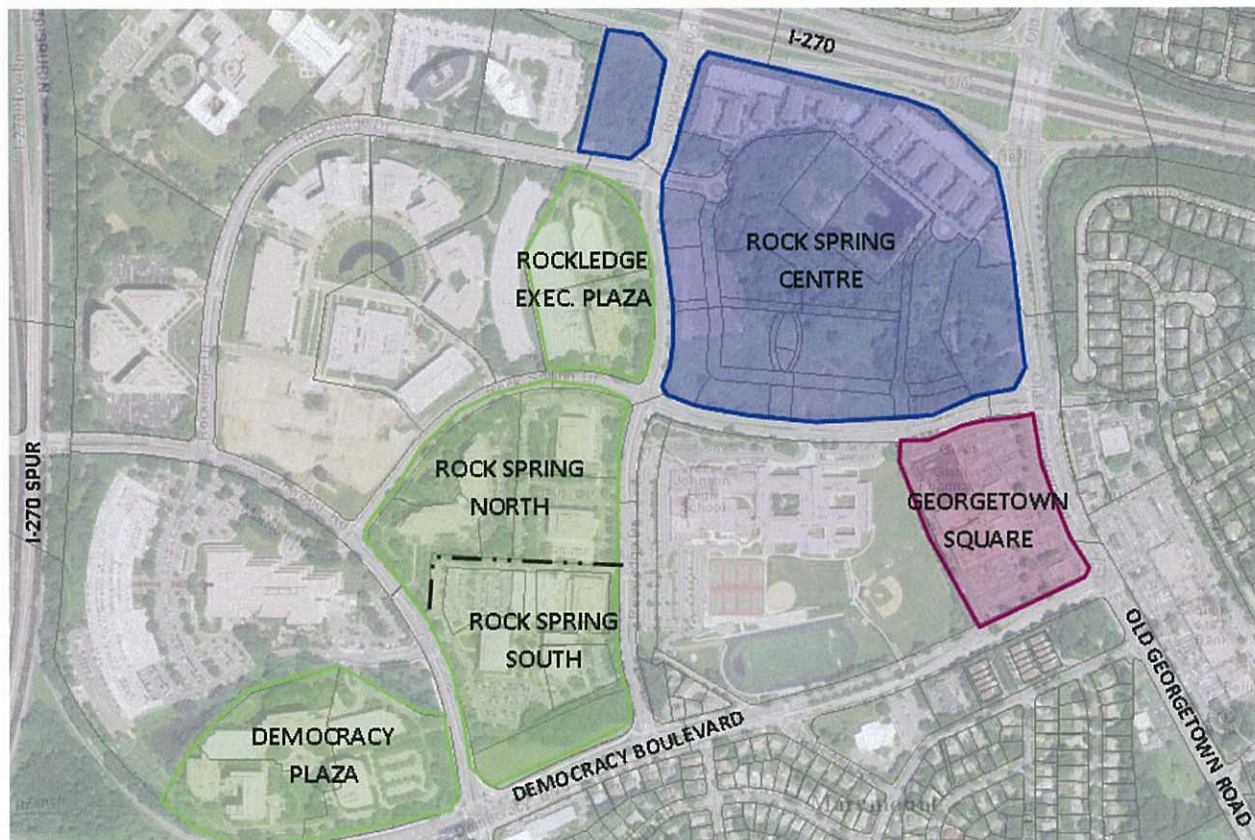


The Rock Spring Centre, while probably the most critical element to the repositioning of Rock Spring as a whole, is not the only focus for a re-imagined Rock Spring. The Central Core, containing existing office properties, the majority of which are owned by the Camalier family and their ownership entities, also are central to the Plan. We urge the Planning Board to keep in mind that there must be incentives in place that will encourage a property owner to reposition and redevelop these various properties if Rock Spring is to reach its potential. For purposes of the Sector Plan and the zoning recommendations, these incentives mainly come in the form of increased density and heights and maximum zoning flexibility. Redevelopment will not happen if the status quo (or very limited increases in density and height) is recommended in the Sector Plan. Viable buildings will not be torn down to accommodate similar structures. If this Central Core is going to be repositioned, redeveloped . . . re-imagined, then CR zoning with meaningful densities and heights (as well as with maximum flexibility between the “C” and “R” components) must be put into place through this sector planning opportunity allowing for the mix of uses and type of development so strongly

recommended in the ULI report, the Office Working Group report and by others in this process.

Discussion of Properties

This testimony focuses on the properties indicated in the map below: Rock Spring Centre, Georgetown Square, and the Core Properties (Rockledge Executive Plaza, Rock Spring North, Rock Spring South, and Democracy Plaza).

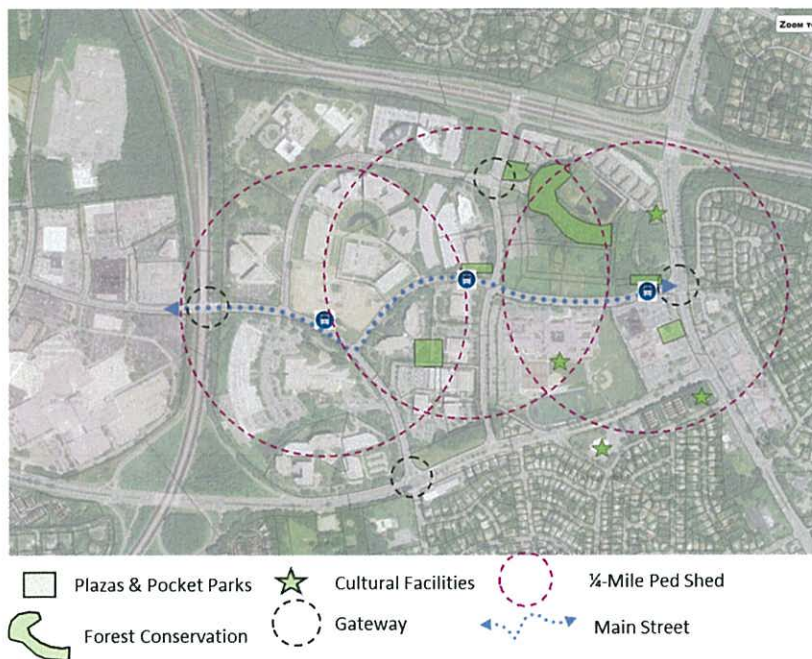


Overall Vision

The Rock Spring Sector Plan began with a promise of substantive goals to take a whole new look and approach for this crossroads of the I-270 corridor and the Beltway including:

- Provide a greater mix of uses and amenity options.
- Strengthen the viability of existing uses.

- Center development between transit stops and create Main Street feel along east-west spine.
- Break up larger blocks in logical manner based on ownership/lotting.
- Use streetscape to foster connections across rights-of-way.
- Encourage a diverse mix of uses to create 24/7 environment and support existing employment uses.
- Create open space nodes appropriate to block character; enhance connections between open spaces.
 - Squares/Plazas.
 - Natural Areas/Trails.
 - Recreation and Community Facilities.
- Establish gateways at primary entrances to community.



This approach focuses on the central spine of the main street connecting the properties to the west of the I-270 spur and the east of Old Georgetown Road. Between these two endpoints, there are three proposed BRT stops that support “ped-sheds” (1/4-mile walking zones) covering circular areas along the spine and into the surrounding north/south blocks. The

argument, therefore, is that a walkable area along this spine is necessary to create a pedestrian environment encouraging use of existing and proposed transit (existing bus and shuttle routes and proposed BRT). This area should promote street-activating uses such as retail and residential entrances, open spaces, and strong way-finding to link area amenities. The existing zoning and resulting land use

patterns along this spine do not support such a vision; our proposed recommendations do.

Rock Spring Centre



Rock Spring Centre will be the catalyst for repurposing the larger area, but – as noted above – has been hamstrung by use and density restrictions and a market that make viable development challenging. To ensure the maximum positive impact for the area, we have proposed several modifications to Staff's recommendations. First, the approved fine-grained road network needs to be reaffirmed,

while adding some flexibility to improve block layout (*e.g.*, providing better access to Old Georgetown Road). Second, the zoning designation should provide for greater flexibility between the C & R designations with the effect of removing the existing caps that are hindering the ability to develop and create the sense of place that will support existing office uses and encourage reinvestment. Third, the Plan needs to strive to create a main street along Rock Spring Drive and promote the integration of multi-modal transportation options. In order to accomplish this vision, we recommend revising the density to 2.0 FAR with heights stepping from 275' to 100' along Old Georgetown Road. The 100' limit along Old Georgetown Road should be encouraged through design guidelines. By doing so, this will promote a better transition to what we see as the eastern gateway at the intersection of Old Georgetown Road with Rock Spring Drive.

- | | |
|------------------------|----------------------------|
| • Existing Zoning | CR-1.5 C-0.75 R-0.75 H-275 |
| • Staff Recommendation | CR-1.5 C-0.75 R-0.75 H-275 |
| • Our Proposal | CR-2.0 C-1.5 R-1.5 H-275 |

There are other recommendations contained in the Draft Plan that we oppose. For example, the suggestion of a potential school site is extremely problematic. As shown in the illustration of the improvements above, this property

owner has invested more than its fair share in improvements to the area; further, the suggestion of a school on this site will dramatically hinder its marketability. We note that there already is an elementary school site identified in the area and MCPS (and the Superintendent) indicated there is no need for an additional middle school. From a planning perspective, this is the wrong location for a school in an area that is the commercial hub and a residential resource for Rock Spring and also is contrary to the Sector Plan recommendation for additional development on the southeast corner as the gateway to the area.

The Plan also mentions that should the plans for Rock Spring Centre be modified, consideration should be given to the creation of more recreational open space. We object to this suggestion, particularly since the property owners already have placed approximately 8 acres of the site in a Category 1 Conservation Easement for the enjoyment of the community and also dedicated a parcel along Old Georgetown Road for recreational use as mandated by the County's Department of Recreation.

Georgetown Square



Georgetown Square has fantastic potential to work as a hinge linking Rock Spring Centre to the mixed-use development across Old Georgetown Road. To achieve this, we can create a two-sided main street and sense of community across Old Georgetown Road and Rock Spring Drive. Redevelopment here also will support transit connectivity via shuttle and bus service to White Flint,

Grosvenor, and Medical Center.

As a gateway location, redevelopment of Georgetown Square will establish a sense of place and identity, but the densities and heights need to be significant enough to encourage redevelopment and appropriate for the transitional location. We have carefully modeled massing and building floor plates and recommend that

densities should be increased to a FAR 2.0 to incentivize a redevelopment with C 1.5 & R 1.5.

- Existing Zoning: NR-0.75 H-45
- Staff Recommendation: CRT-1.25 C-0.75 R-0.75 H-75
- Our Proposal: CRT-2.0 C-1.5 R-1.5 H-80

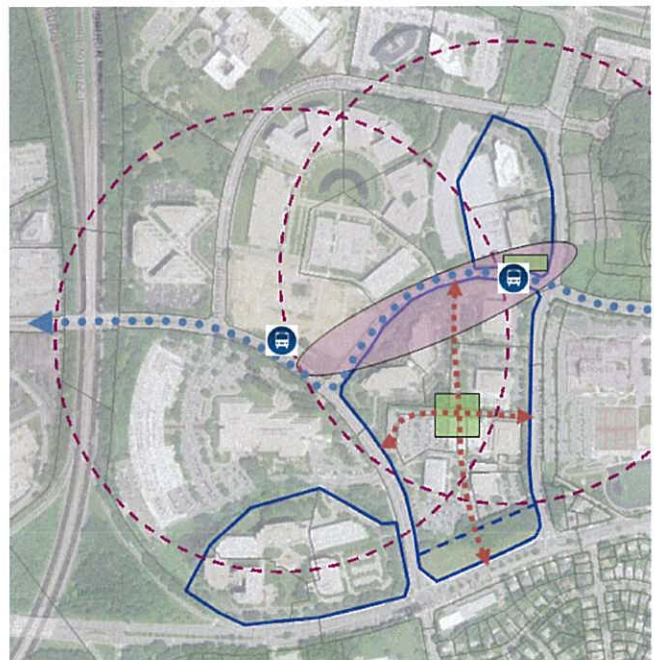


This zoning will allow for the creation of two 5-story buildings around structured parking and a significant central open space. The removal and repurposing of the single-use retail and surface parking can be a prime example of sustainable redevelopment supporting the larger land use and environmental goals of the Sector Plan.

Core Properties

The Core Properties are varied and, therefore, require more fine-grained consideration than the current Draft Plan proposes. Generally, however, it is hard to understand how the goals of the Sector Plan can be achieved without rezoning from the office-focused EOF zones to mixed-use CR zones.⁵ This is especially true around the main street.

We agree wholeheartedly with Staff's vision that "promoting the long-term transformation of Rock Spring's central core, the office park, is a priority of this Plan" and their qualifying statement focusing on



⁵ Again, this contention is strongly supported by the ULI Panel and the Office Working Group.

“properties that have direct access to the central spine” (*see* page 19). But the implementation recommendations of the Plan will not achieve this; instead the Sector Plan puts the onus on property owners to request a rezoning (*i.e.*, a Local Map Amendment) to fulfill the vision. In our opinion, if there is a vision, the tools should be put forward to meet that vision; there is no reason to wait.

More importantly, the near-term recommendations promoting infill development along the central spine to “support future transit and create pedestrian-friendly clusters” (page 19) will not be achieved by retaining the EOF zones. If rezoned under the Sector Plan, infill development will occur that supports the objectives of this transformation. Key to this design vision is the allowance of mixed-use development on day one. The office market is lack-luster at best and fading away at worst. Current trends show that more people work from home and those that work in offices prefer mixed-use, transit-accessible spaces. The CR zones will provide that mix of uses and new development come on-line sooner will promote the implementation of the BRT line to Metro. But this positive feedback loop needs the right implementation tools to succeed.

Several points summarize the benefits of CR zoning for the Core Properties. CR zones will:

- Encourage a mix of uses to promote the vibrant, 24/7 live/work/play environment.
- Provide integrated uses through flexibility for market forces.
- Allow for independent living and senior housing as a permitted use near existing medical office buildings (thereby supporting and promoting growth of a health care node).
- Allow for density averaging between properties providing the ability to better respond to compatibility issues.
- Provide additional public benefits – such as public open space (rather than private amenity open space required under the EOF zone) – at a lower density threshold.
- Create an active, pedestrian-oriented main street.
- Support the viability of existing uses and allow additional service-industry employment opportunities.

Because the EOF zones do not encourage this complete approach to a main-street, mixed-use vision, we are recommending Commercial Residential zones with varied heights based on individual site characteristics. Densities increased to a 2.5 FAR will provide the incentive necessary to redevelop these properties at the core. Greater heights at the center (equal to Rock Spring Centre) could then step to 110’ along Democracy Boulevard. These densities and heights are appropriate and

compatible with the surrounding area.

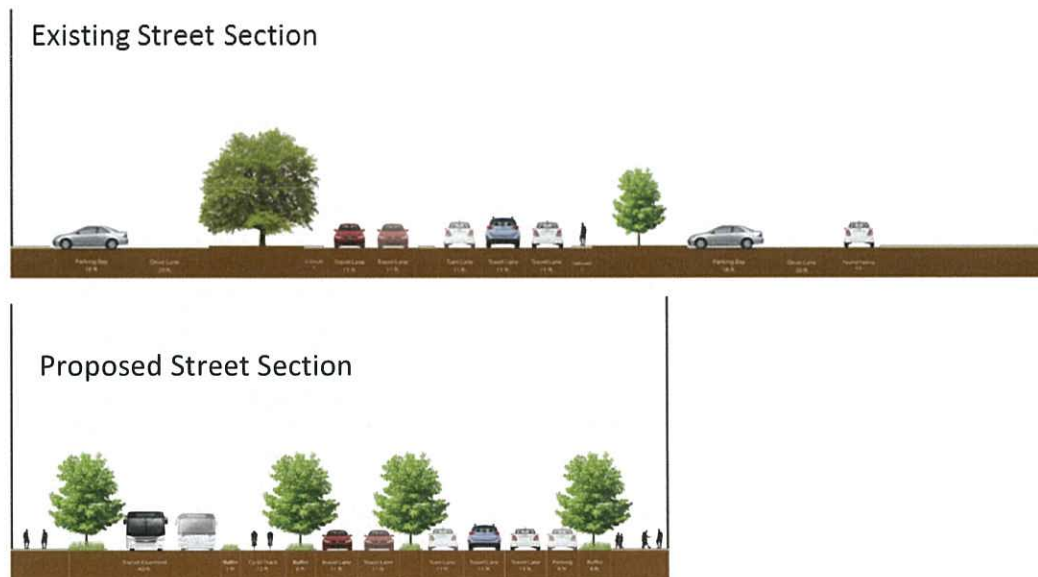
- Rockledge Executive Plaza
(Rockledge Executive Plaza One and Two)
 - Existing Zoning EOF-1.0 H-100
 - Staff Recommendation EOF-1.5 H-100
 - Our Proposal CR-2.5 C-2.0 R-2.0 H-275
- Rock Spring North
(Bedford Building; Westmoreland Building; Rock Spring Plaza 1 & 2)
 - Existing Zoning EOF-1.0 to 1.5 H-100
 - Staff Recommendation EOF-1.5 H-100
 - Our Proposal CR-2.5-C-2.0 R-2.0 H-225
- Rock Spring South
(Johns Hopkins Medical Building, approved Lincoln Building, Camalier and Champlain Buildings).
 - Existing Zoning EOF-1.0 H-100
 - Staff Recommendation EOF-1.5 H-100
 - Our Proposal CR-2.5 C-2.0 R-2.0 H-150
- Democracy Plaza
(One Democracy Plaza and Two Democracy Plaza; Marriott Suites Hotel)
 - Existing Zoning EOF-1.0 H-110
 - Staff Recommendation EOF-1.5 H-110
 - Our Proposal CR-2.5 C-2.0 R-2.0 H-150⁶

These densities and heights will result in a build-out more in line with the goals of the Sector Plan; they also reflect the realities of redevelopment costs. Higher heights are proposed near the center with densities that support the redevelopment of office buildings with structured parking, more energy-efficient floor plates, and space for open space, tree canopy, and amenities. Such building typologies also reinforce the main-street development that will tie the two mixed-



⁶ If the Marriott Property is rezoned to a CR zone, Democracy Plaza should be similarly classified to CR to allow for holistic planning of the block. The Draft Plan recognizes that if a floating zone is recommended, densities of 2.5 FAR with heights of up to 150 feet are appropriate. We support this density and height recommendation now, without the need for a floating zone.

use endpoints together along a more walkable, viable streetscape. The existing and proposed street section is shown below.



We understand that a “greenway” connection is proposed between the Walter Johnson High School property and the Marriot property. While we fully support additional pedestrian connections and green streets, we want to ensure this does not entail naturalization and associated environmental buffers.

It also has been suggested that the CR zones have more onerous requirements that may be difficult to implement, but with the CR zoning proposed, these projects usually will be developed under the Optional Method with negotiated development standards. Again, pushing these decisions to a later time via floating zone recommendations not only increases costs and review times, but also sidesteps the land planning process where zoning and urban design decisions supporting the Sector Plan’s goals should be made at the time of Sector Plan adoption.

Conclusion

We have undertaken careful massing and open space studies with base information that is much more detailed than Staff generally puts together at the master-planning stage. Thus, we feel the densities and heights we have suggested are more appropriate and will better realize the vision of the Sector Plan – a reimagined 21st century mixed-use employment node. Our proposed rezoning and open space plan supports several important objectives:

- Creates a 24/7 invigorated mixed-use connected center instead of an outdated single purpose office park.
- Maintains significant forest conservation area.
- Creates individual neighborhood parks, squares, and plazas with a variety of types and sizes.
- Connects networked open spaces.
- Creates a comprehensive and fine-grained block pattern.
- Ensures stepped heights – increasing toward central district along BRT route.
- Encourages street-oriented building locations.
- Provides visual porosity and axial viewsheds leading to open space.



We appreciate the opportunity to submit this more extensive written testimony and offer our views regarding the recommendations contained in the Draft Plan for the Rock Spring Centre, the Georgetown Square property and the Core Area. Rock Spring is an area with tremendous potential but also an area that needs help.

The Rock Spring Centre is integral to a re-imagined Rock Spring. The County, together with the property

owners, needs to make sure that this project moves forward and is not derailed. Our recommendations for the Rock Spring Centre property ensure that the project

remains viable, provides for additional density that may be needed to bolster some of the uses and provides for the flexibility to respond to market conditions by equalizing at greater levels, the C & R of the equation. This is essential, given that the prior MXPD zone and the CR zone, in its present form, substantially limit this flexibility.

As for Georgetown Square, we are very close to Staff's recommendation. This is a property that is uniquely situated and could one day be integrated into Rock Spring Centre. The density and height on this site needs to be adjusted upward to accommodate a viable redevelopment opportunity.

The County needs to be bold and not just nibble around the edges in the Core Area. There needs to be real incentives for redevelopment – ones that can occur through the CR zone at densities and heights (and with the zoning flexibility) that will promote redevelopment of Rock Spring. There are opportunities to reposition the Core Area, particularly with the common site ownership and the recommendations that Mr. Sloan set forth at the public hearing and in this written testimony. This is probably the most complicated area of the Plan, but also the area that needs the most robust recommendations.

The Planning Board has property owners before it that are willing to work together with the County to help re-imagine Rock Spring. The status quo is not the answer. Instead, what is needed is a plan that does what it was originally intended to do – to reposition and reinvigorate this area of the County into a mixed use, highly energized 24/7 center – that is what it will take to achieve a re-imagined Rock Spring.

We will be available at the Planning Board's worksessions and look forward to participating in the shaping of this Rock Spring Sector Plan. Thank you.

Very truly yours,



Steven A. Robins



Patrick L. O'Neil

The Honorable Casey Anderson and
Members of the Montgomery County Planning Board
December 13, 2016
Page 17

Cc: Chris Camalier, Esquire
John Davis
Davis Camalier
Skip Davis
Charles Irish
Joshua Sloan
Steven Silverman

ROCK SPRING SECTOR PLAN

THE CAMALIER DAVIS PROPERTIES



THE CAMALIER DAVIS PROPERTIES

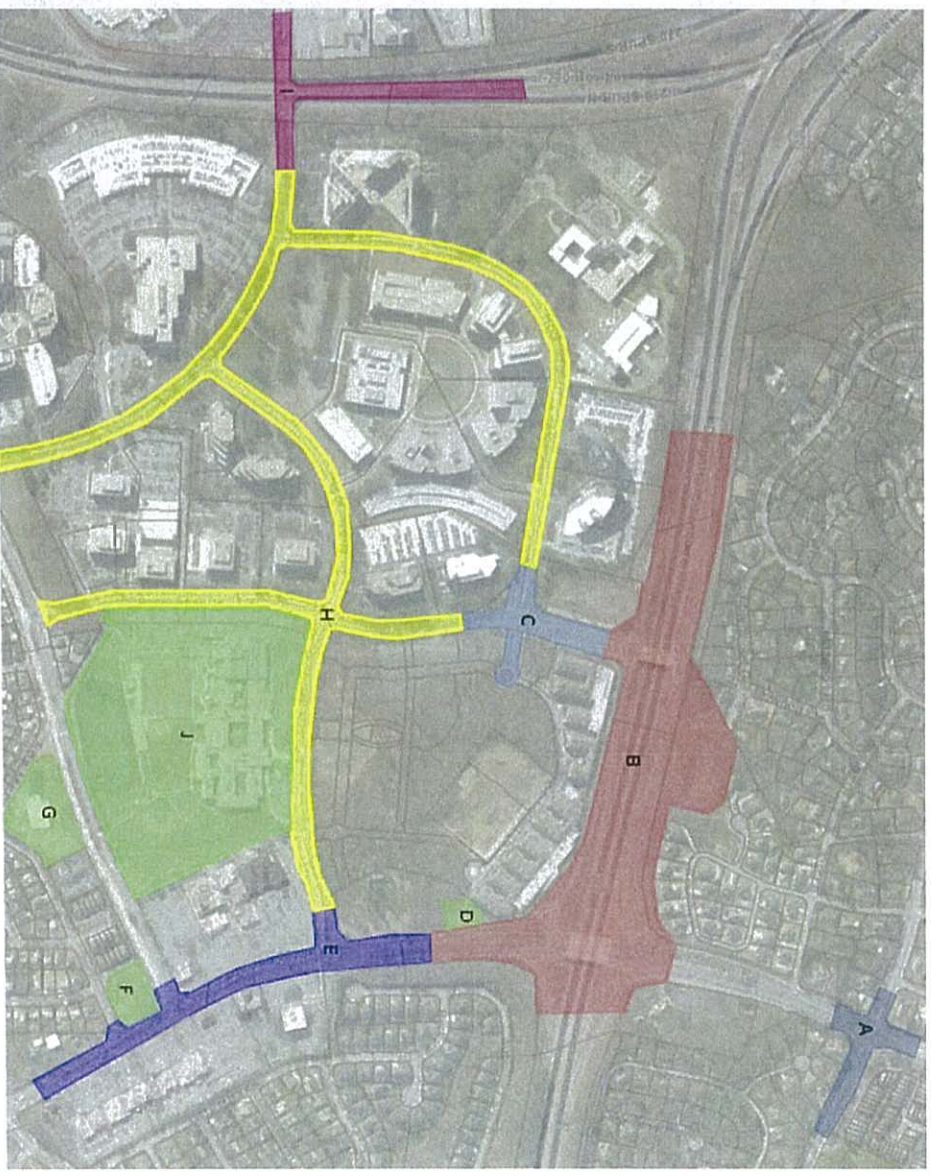
CONTENTS

- INTRODUCTION
- OWNER STATEMENT
- SUBJECT PROPERTIES
 - GENERAL APPROACH
 - ROCK SPRING CENTRE
 - GEORGETOWN SQUARE
 - CORE PROPERTIES
- CONCLUSION



PREVIOUS IMPROVEMENTS BY THE CAMALIER DAVIS ENTITIES

- A.** Construction of west-bound left turn lane on Tuckerman Lane at intersection with Old Georgetown Road
- B.** Dedication and contribution of \$1,500,000 toward the construction of the Rockledge Connector Interchange with I-270 & dedication of SWM area for SHA improvements
- C.** Dedication and construction of the realignment of Rockledge Drive to connect with Rockledge Connector interchange
- D.** Dedication of recreation parcel M
- E.** Dedication and construction of widening of Old Georgetown Road to remove northbound "trap lane" and add northbound left turn lanes at Democracy Blvd and Rock Spring Drive
- F.** Dedication of park area
- G.** Dedication of the Davis Library site
- H.** Dedication and construction of Fernwood Road, Rockledge Drive, and Rock Spring Drive
- I.** Major financial contributions for construction of Fernwood/Westlake Terrace Bridge over I-270
- J.** Conveyed School Site



LERCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

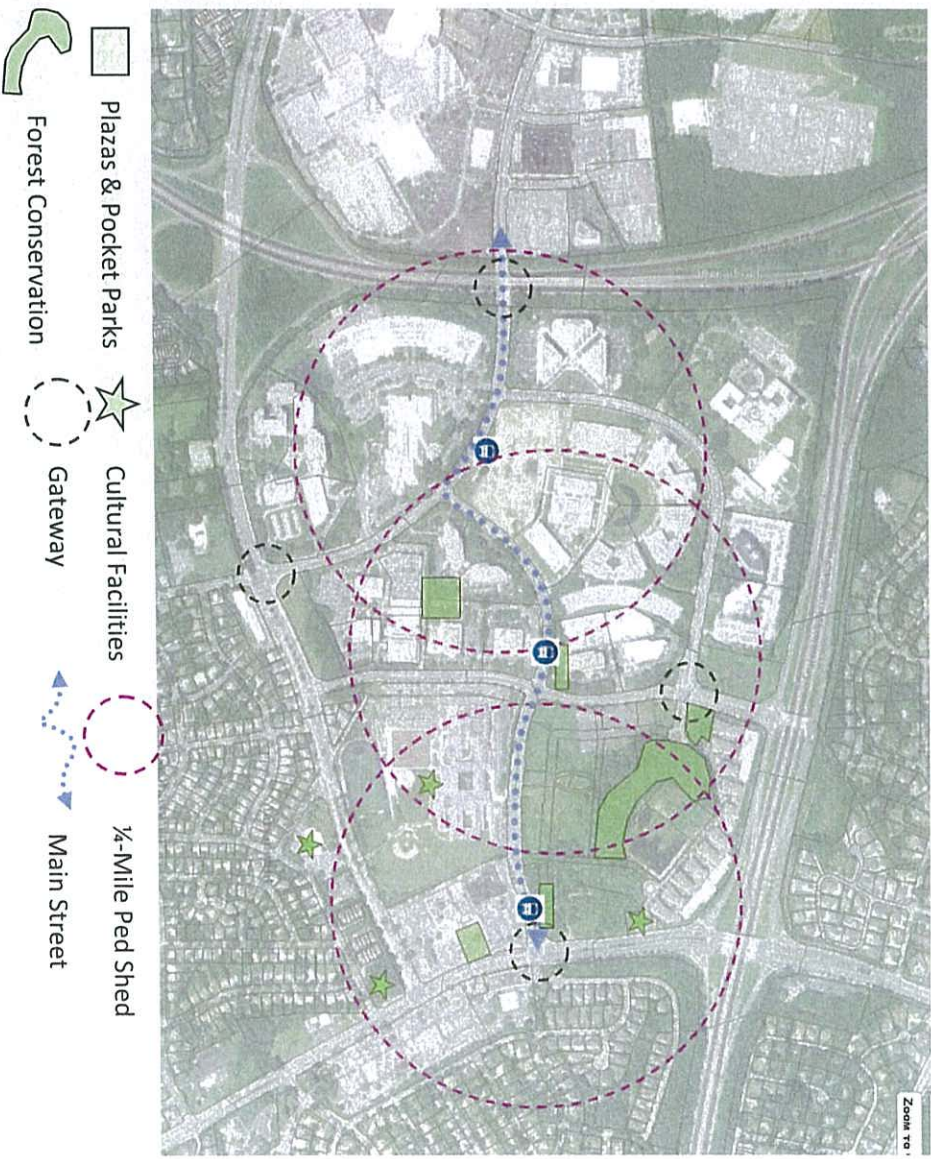
- Create "comp
- Establish safe bicycle connec
- Build smaller l





OVERALL CONCEPTS

- Center development between transit & create Main Street feel along east-west spine
- Break up larger blocks in logical manner based on ownership/lotting
- Use streetscape to foster connections across rights-of-way
- Encourage a diverse mix of uses to create 24/7 environment & support existing employment uses
- Create open space nodes appropriate to block character; enhance connections between open spaces
 - Squares/Plazas
 - Natural Areas/Trails
 - Recreation & Community Facilities
- Establish gateways at primary entrances to community



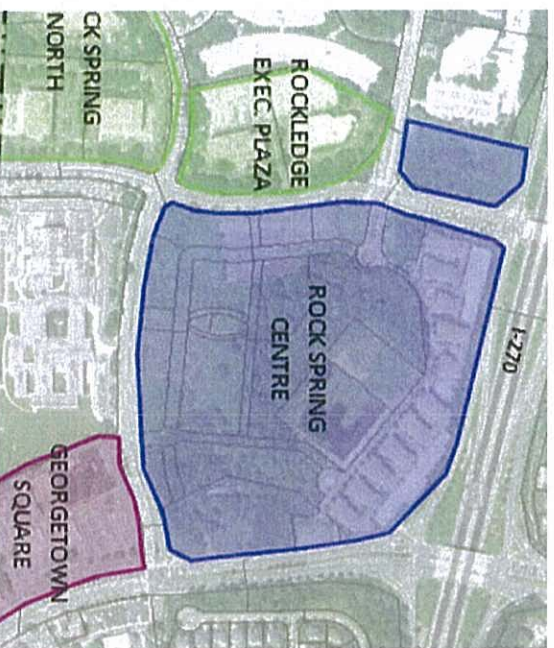
THE CAMALIER DAVIS PROPERTIES



LERCH
EARLY &
BREWER

ROCK SPRING CENTRE


- Property is fully entitled with its approvals and is pursuing start of construction in short order
- Approvals include residential, retail, office, and hotel uses
- The Sector Plan should recognize and encourage the implementation of the plans

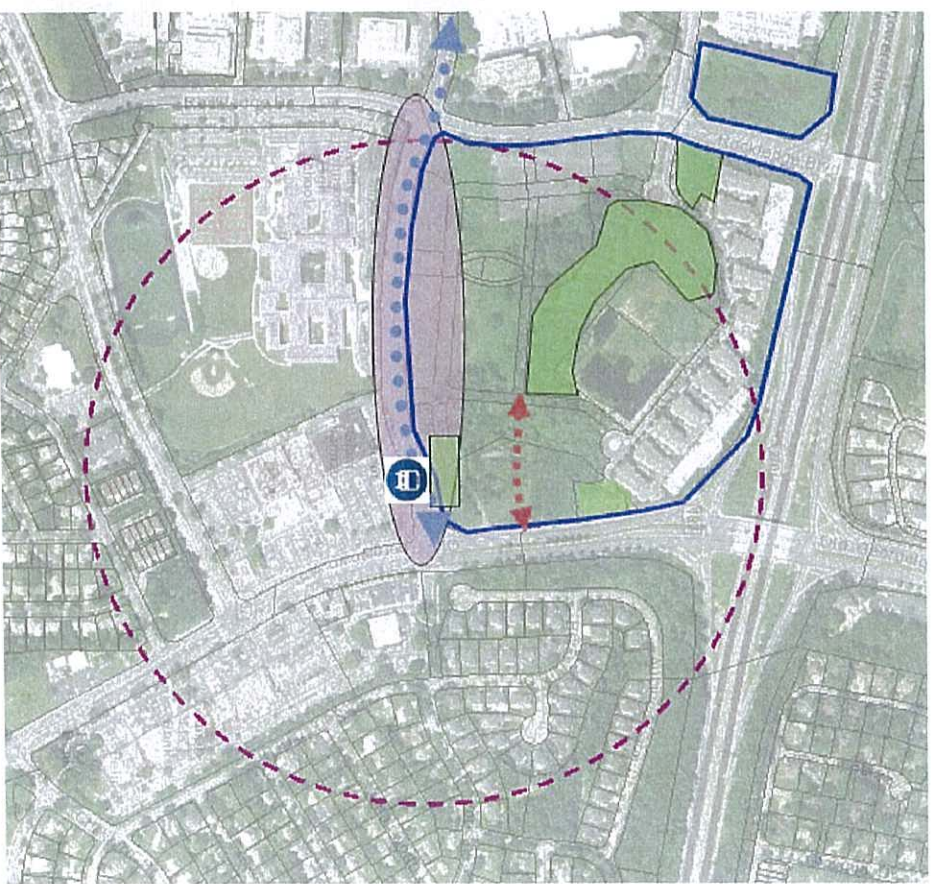


LERCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

ROCK SPRING CENTRE

- Reaffirm fine-grained road with some flexibility to improve block layout, e.g., access point to Old Georgetown Road 
- Zoning designation should provide for greater flexibility in C & R designations – existing caps are hindering ability to develop
- Create main street along Rock Spring Drive
- Revised density is appropriate to 2.0 FAR with heights stepping from 275' to 100' along Old Georgetown Road
- Zoning
 - Existing: CR-1.5 C-0.75 R-0.75 H-275
 - Staff Draft: no change
 - Proposal: CR-2.0 C-1.5 R-1.5 H-275



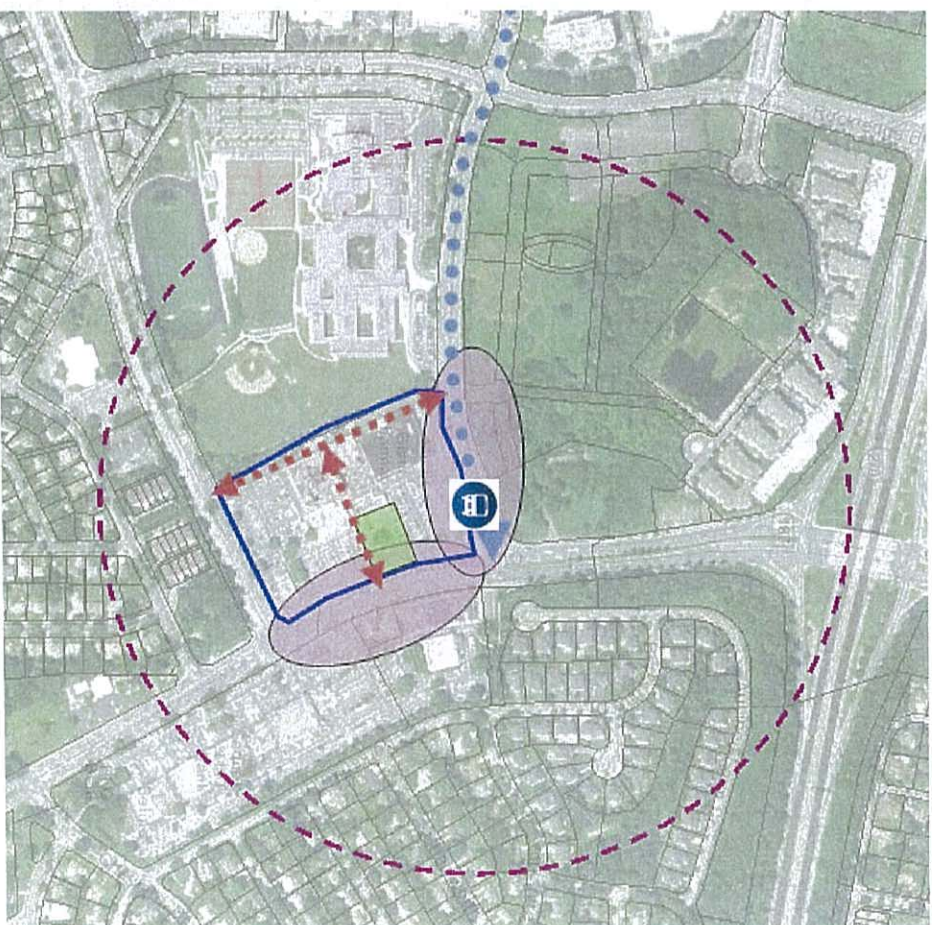
THE CAMALIER DAVIS PROPERTIES



LERCH
EARLY &
BREWER

GEORGETOWN SQUARE

- Redevelopment should relate to the development at the Rock Spring Centre
- Create a two-sided main street and sense of scale across Old Georgetown Road & Rock Spring Drive
- Support & enhance transit connectivity to White Flint, Grosvenor, & Medical Center Metro Stations

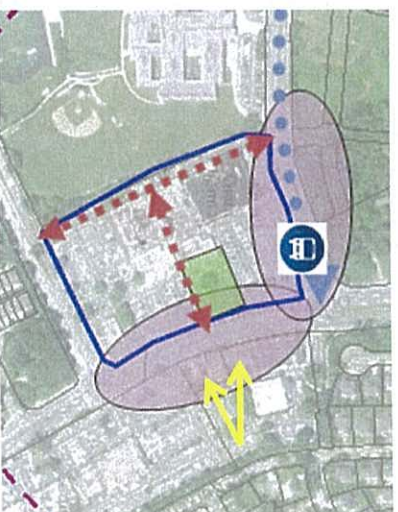


LE RCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

GEORGETOWN SQUARE

- Gateway location will establish sense of place & identity
- Height must accommodate mid-rise development with various floor-to-floor dimensions
- Densities should be increased to FAR 2.0 to incentivize a redevelopment with C 1.5 & R 1.5 (shown in model)
- Zoning
 - Existing: NR-0.75 H-45
 - Staff Draft: CRT-1.25 C-0.75 R-0.75 H-75
 - Proposed: CRT-2.0 C-1.5 R-1.5 H-80



Plaza & Building Massing at 2.0 FAR

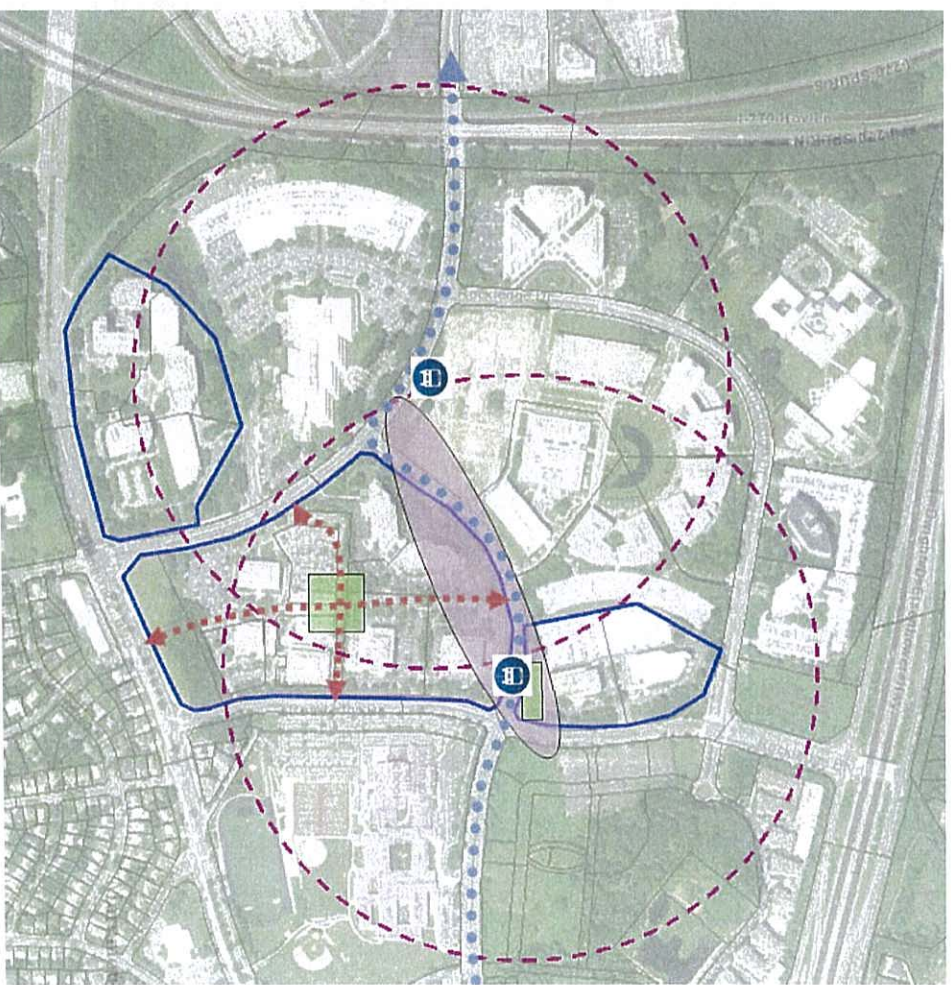


LE RCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

CORE PROPERTIES

- Eliminate the EOF zone on central parcels in favor of the CR zones:
- Envisioned integrated community requires flexibility for market forces
- Would allow for independent living and senior housing as a permitted use
- Would allow for density averaging between properties
- Provide additional public benefits at lower threshold
- Encourage a mix of uses to promote the vibrant, 24/7 live/work/play environment
- Create active, pedestrian-oriented main street
- Support viability of existing uses



THE CAMALIER DAVIS PROPERTIES



LERCH
EARLY &
BREWER

CORE PROPERTIES

- Allow/encourage BRT right-of-way dedications
- Encourage a mix of uses to promote the vibrant, 24/7 live/work/play environment
- Create active, pedestrian-oriented main street
- Support viability of existing uses

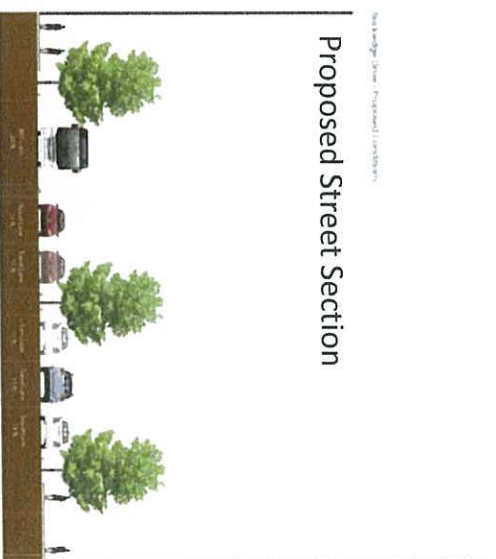
2014 KnightRider Drive - Existing Conditions

Existing Street Section



2014 KnightRider Drive - Proposed Conditions

Proposed Street Section



LERCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

CORE PROPERTIES

- Densities increased to a 2.5 FAR will provide the incentive necessary to redevelop these properties
- Allow heights at center equal to Rock Spring Centre & step down to 100' along Democracy Blvd
- Rockledge Executive Zoning
 - Existing: EOF-1.0 H-100
 - Staff Draft: EOF-1.5 H-100
 - Proposed: CR-2.5 C-2.0 R-2.0 H-275
- Rock Spring North Zoning
 - Existing: EOF-1.0 to 1.5 H-100
 - Staff Draft: EOF-1.5 H-100
 - Proposed: CR-2.5-C-2.0 R-2.0 H-225
- Rock Spring South Zoning
 - Existing: EOF-1.0 H-100
 - Staff Draft: EOF-1.5 H-100
 - Proposed: CR-2.5 C-2.0 R-2.0 H-150
- Democracy Plaza
 - Existing: EOF-1.0 H-110
 - Staff Draft: EOF-1.5 H-110
 - Our Proposal: CR-2.5 C-2.0 R-2.0 H-150
- If the EOF zone is retained, it should include a recommendation to rezone to a CR floating zone in the future



Main Street Potential



LE RCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

POTENTIAL BUILDING & OPEN SPACE LAYOUT

- Significant forest conservation area
- Individual neighborhood parks, squares, & plazas with variety of types and sizes
- Networked open spaces
- Comprehensive and fine-grained block pattern
- Stepped heights toward central district along BRT route
- Street-oriented building locations
- Visual porosity and axial viewsheds leading to open space



LERCH
EARLY &
BREWER

THE CAMALIER DAVIS PROPERTIES

CONCLUSION

- Rock Spring is an area with tremendous potential but needs help
- Address comments from ULI and the Office Task Force
- Rock Spring Centre is integral to the Re-Imagined Rock Spring
- Recommendations ensure that the project remains viable, provides for additional density that may be needed to bolster some of the uses and provides for the flexibility to respond to market conditions
- Be bold: provide real incentives to redevelopment
- Reposition the Core Area
- Tweak recommendations for Georgetown Square
- Let's not accept the status quo but instead create a plan that does what it was originally set out to do – to reposition this area of the County as a mixed use, highly energized center – a re-imagined Rock Spring
- Thank you



LERCH
EARLY &
BREWER

December 14, 2016

Casey Anderson, Chairman
Members, Montgomery County Planning Board
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re: Rock Spring Master Plan Testimony
Marbeth Partnership (Marriott International Hdqtrs) Property
Our File No. 128700.0002

Dear Commissioner Anderson and Members of the Board:

This testimony is jointly submitted on behalf of our clients, Marbeth Partnership ("Marbeth"), the fee owner of the Property, and Marriott International, Inc. ("Marriott"), the long term ground lease holder and tenant in possession. As has been publicly announced, Marriott intends to relocate its headquarters office to downtown Bethesda within the next six years. As of now, neither Marbeth nor Marriott have long term plans for re-use of the existing 800,000 gsf office building and parking garage on the site. They have begun their analysis of options for re-use and re-development of the site.

The Marbeth Property sits in a unique location with over 2,188 feet of frontage on the main "spine" of the Plan, has locational visibility from the I-270 spur, and is the vista at the terminus of the two main internal intersections in the Park at Fernwood with Rock Spring and at Fernwood with Rockledge. The Marbeth Property is the "spine connector" property that could be the place-making change-agent that brings a very visible and accessible "*place*" to office employees, visitors, and residents of Rock Spring office park. Encouraging place-making on this Property, as recommended in the draft plan, could turn the tide on the value and desirability of the other existing office sites within the Park.

In order to activate this "place" as an active connection between the regional retail district to the west and the approved village center and retail district to the east, the allowable uses for non-office commercial and residential uses on this Property need to be expanded, either by modifying the EOF zone or rezoning the Property to the CR zone. Constraints under the EOF zone in Rock Spring should be removed that would limit the ability to create the amenity-rich first class office park of the future. Eliminating the cap on retail and personal services, now limited to only 30% of the on-site square footage, would open up possibilities, to include such uses, by way of illustration only, as: a restaurant park, a grocery store, retail and entertainment uses, - all as part of an integrated, mixed use office and commercial, multi-family and/or attached residential development. Lessons learned in what has been successful in activating Park

Potomac for the office users there can be scaled and adapted for the much larger Rock Spring office park plan area.

REQUESTS:

1. Marbeth and Marriott ask that the proposed zoning of the Property include an increase of allowable height from 100 feet to 150 feet similar to the height allowed throughout the Park. The increase in allowable height would provide broader flexibility of building type. This will be critical for creating a design for the site able to accommodate a mix of new uses along with preserving the existing sloping open space down to the tributary in the southern corner of the site, creating new gathering spaces along Fernwood to activate the spine, and separating building occupants from the noise of the I-270 spur. Additional height on the Marbeth Property is compatible as it is shielded from the view of the single family neighborhood to the southeast by the two office buildings and the hotel on the adjoining lot.
2. Marbeth and Marriott ask that the Property be rezoned to CR1.5 C1.5 R1.0 H150 to accommodate a broader range of commercial uses. Alternatively, it is requested that the EOF1.5 H150 zone be modified for Rock Spring Park to: i) eliminate the minimum required office component on each site; ii) lift the artificial caps on residential (now 30%) and retail and personal services (now 30%) as a percentage of development on a site; and iii) eliminate the cap on the size of retail uses (now limited to less than 50,000 gsf).
3. The Property is a critical piece to activate the Plan and should not be recommended for a school site. The Marbeth Property is approximately 33 acres but the southern section of the site is covered by slopes to a tributary, and 25% of the remainder of the site is covered by an existing viable 2300+ space parking garage. This will direct any re-development to the front along Fernwood Road. To activate the site, redevelopment needs to engage the Fernwood Road frontage and a large footprint will be needed to accommodate the recommendations in the Plan for on-site civic plaza/gathering spaces, active recreation, and pedestrian connections. The site constraints and limited vehicular access to Fernwood Road do not support both the development needed along the "Plan Spine" to reach the goals of the Plan and the large land footprint needed for a school site.

WHY IS RE-USE OF THE EXISTING OFFICE BUILDING DIFFICULT?

The existing Marriott headquarters office building is configured in extremely large 120,000 sf floor plates with depths of over 120 feet from the core to the exterior windows. This

configuration does not meet current desirable proportions of office design that values natural daylighting throughout. The large floor plates also limit the re-use options as a multi-tenanted office building or conversion to a residential use. The existing office building could be utilized by a single large employer (the market of which is very limited).

While Marbeth and Marriott continue to explore potential options for the Property that could exert a positive influence on the viability of Rock Spring Park as a first class office park of the future, they respectfully request the recommendations for the Property in the master plan be modified as set forth above to provide the flexibility for a market-driven development at this critical location. It is one of the key parcels that could change the future of Rock Spring Park.

Sincerely,
SHULMAN, ROGERS, GANDAL,
PORDY & ECKER, P.A.

By:



Nancy P. Regelin



David D. Freishtat

cc: Marbeth Partnership
Marriott International, Inc.
Arthur Greenberg, Savills Studley



ideas that work

Attorneys at Law

3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
www.lerchearly.com

Patricia A. Harris

Tel. (301) 841-3832
Fax (301) 347-3756
paharris@lerchearly.com

December 13, 2016

By Electronic Mail

Casey Anderson, Chair
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

Re: Rock Spring Master Plan – Westfield Montgomery Mall

Dear Chair Anderson and Planning Board Members:

On behalf of Montgomery Mall Owner, L.L.C., the owner of Westfield Montgomery Mall (“Westfield”) and in connection with the Rock Spring Master Plan, we herein submit for your consideration a Zoning Text Amendment (“ZTA”) for the Regional Shopping Center (“RSC”) Overlay Zone, in furtherance of the recommendations of the Rock Spring Master Plan Public Hearing Draft.

By way of brief background, the 57.72 acre Montgomery Mall parcel (the “Property”) is currently zoned GR 1.5, H 45’, and is subject to the RSC Overlay Zone. The Master Plan recommends a continuation of this existing zoning, which is acceptable to Westfield (and hence the reason Westfield did not testify at the Planning Board public hearing on December 8, 2016). The GR zone limits the amount of residential density on the Property to 30 percent of the gross floor area on the Property. Further, the RSC Overlay zone allows a maximum height of 90 feet for buildings that include a theater complex and 130 feet for hotels.

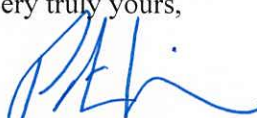
The Property is currently improved with approximately 1.2 million square feet devoted to a regional mall. In 2005, Westfield obtained Preliminary Plan approval for an additional 500,000 square feet of development, to accommodate additional retail uses, a multi-screen movie theater and a future hotel. In accordance with the GR Zone and as previously discussed with Planning Staff, Westfield is interested in devoting a portion of the approved 500,000 square feet to multi-family residential use, as permitted by the GR Zone. While the current zoning allows heights up to 130 feet on the site for hotel use, the height for the permitted residential uses is limited to 45 feet.

Recognizing the limitations of the current GR and RSC Overlay Zones, the Master Plan on page 33 recommends amending the RSC Overlay Zone to confirm the permissibility of residential uses and to modify any associated development standards. Accordingly, in furtherance of this recommendation and in order to accommodate a more appropriate and desirable residential housing form, Westfield proposes that a ZTA reflecting the changes set forth on Attachment A, be pursued in connection with the Rock Spring Master Plan. The corresponding processing of the Master Plan and the ZTA ensures that the recommendations set forth in the Master Plan are achievable.

Casey Anderson
December 13, 2016
Page 2

We appreciate your consideration of this matter.

Very truly yours,



Patricia Harris

Enclosure

cc: Ms. Nancy Sturgeon
Mr. Jim Agliata

Section 4.9.11. Regional Shopping Center (RSC) Overlay Zone

B. Land Uses

The following uses are permitted as part of a regional shopping center.

1. Hotel, Motel, Residential

C. Development Standards

1. To accommodate development at a regional shopping center with a gross leasable area that is greater than or will be greater than (if approved by site plan) 1,200,000 square feet, building height may be increased to:
 - a. 90 feet for a building that includes a theater complex; ~~and;~~
 - b. 130 feet for a Hotel, Motel; and
 - c. 150 feet for a multi-family residential building.

E. Parking

1. Requirement

- a. The parking requirement for a regional shopping center is 4 parking spaces for each 1,000 square feet of gross leasable area
- b. The parking requirement for separate standing office and professional buildings and multi-family residential buildings is under Division 6.2.



ideas that work

Attorneys at Law

3 Bethesda Metro Center, Suite 460
Bethesda, MD 20814
www.lerchearly.com

Patricia A. Harris

Tel. (301) 841-3832
Fax (301) 347-3756
paharris@lerchearly.com

December 15, 2016

By Electronic Mail

Casey Anderson, Chair
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

Re: Rock Spring Master Plan – Wildwood Shopping Center

Dear Chair Anderson and Planning Board Members:

On behalf of Federal Realty Investment Trust("Federal"), the owner of the Wildwood Shopping Center located at 10233 Old Georgetown Road (the "Property"), and in connection with the Rock Spring Master Plan, we wanted to briefly comment on the proposed zoning for the Property and the need for uniformity in the Board's zoning recommendations.

The Property is currently split zoned, with the retail building and the parking field in front of the building zoned NR .75, H 45'. The remainder of the Property, which consists of the parking fields located to the east, north and south of the building is zoned R-90. The Master Plan recommends the Property for the CRT 1.25, C.75, R.75 H 50' zone. Federal finds this recommended zoning generally acceptable, which is the reason it did not testify at the Planning Board public hearing on December 8, 2016.

The Master Plan's zoning recommendation for the site located immediately to the north of the Property is appropriately identical to the zoning recommendation for Federal's Property -- CRT 1.25, C.75, R.75 H 50'. The location and surrounding uses of both sites call for uniform zoning. During the Planning Board hearing on the Master Plan, representatives of the owner Aubinoe Properties testified for an increase in the height to 65 feet.¹ To the extent that the Planning Board decides to increase the height on the Aubinoe property from 50 feet to 65 feet, Federal respectfully requests a similar increase. An increase in height would promote consistent development along this area of Old Georgetown Road, facilitate any future mixed-use development on the Property and allow for more design flexibility.

¹ The representative originally testified for a height of 63 feet, but agreed with the suggestion of a Planning Board member that if the owner were seeking an increase, it would be logical to request 65 feet.

Casey Anderson
December 15, 2016
Page 2

We appreciate your consideration of this request.

Very truly yours,



Patricia Harris

cc: Ms. Nancy Sturgeon
Mr. Matt Monahon

Law Offices Of
MILLER, MILLER & CANBY
MM&C
CLIENT FOCUSED. RESULTS DRIVEN.

200-B MONROE STREET, ROCKVILLE, MARYLAND 20850 P: 301.762.5212 F: 301.762.6044 WWW.MILLERMILLERCANBY.COM

All attorneys admitted in Maryland and where indicated.

PATRICK C. MCKEEVER (DC)
JAMES L. THOMPSON (DC)
LEWIS R. SCHUMANN
JODY S. KLINE
JOSEPH P. SUNTUM

ROBERT E. GOUGH
DONNA E. MCBRIDE (DC)
GLENN M. ANDERSON (FL)
HELEN M. WHELAN (DC, WV)
MICHAEL G. CAMPBELL (DC, VA)

SOO LEE-CHO (CA)
BOBBY BAGHERI (DC, VA)
DIANE E. FEUERHERD
MICHAEL S. SPENCER
CALLIE CARNEMARK (VA)

SLCHO@MMCANBY.COM

December 15, 2016

Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

RE: Rock Spring Master Plan Public Hearing Draft;
Aubinoe Properties Recommendations

Dear Chair Anderson and Members of the Planning Board:

This office represents Mr. Alvin "Tripp" Aubinoe, the owner of property located at 10405 Old Georgetown Road, also known as Wildwood Medical Center. Recommendations for land use and zoning relative to the Mr. Aubinoe's property can be found on pages 24-27 and Figure 10 of the Rock Spring Master Plan Public Hearing Draft ("Public Hearing Draft").

As stated in our brief testimony before the Planning Board at the public hearing on December 1, 2016, Mr. Aubinoe has a pending local map amendment application (LMA No. H-117) that seeks to remove binding elements imposed under a previous schematic development plan amendment approval in order to allow more flexibility in the mix of uses that can be developed on the property, consistent with the property's current and recommended CRT zoning.

As testified by Mr. Dennis Swihart of SGA Companies, Inc., the project architect, however, the 50 foot height limit proposed by the Public Hearing Draft would pose a significant constraint for the project to be able to achieve what in today's competitive market has become the standard – i.e., interior ceiling heights of 9-10 feet for residential and 14 feet for ground floor retail. As such, in order to realistically achieve a project consisting of four-stories of residential above ground floor retail, we believe a **minimum of 56 feet** will be necessary when you take into account the depth of the space needed in between each floor, etc. that would add to the overall building height.

The project design team understands the need to provide a compatible transition to the single-family detached community located to the east of Mr. Aubinoe's site adjacent to Berkshire Drive and will be working to comply with the recommendations on page 27 of the Public Hearing Draft in that regard, but seeks consideration of additional height along the Old Georgetown Road side of the project as indicated above.

Thank you for your consideration of these comments.

Sincerely yours,

MILLER, MILLER & CANBY



Soo Lee-Cho

cc: Nancy Sturgeon
Tripp Aubinoe
Sas Gharai
Dennis Swihart
Chris Colcross
Mike Plitt



DEPARTMENT OF GENERAL SERVICES

Isiah Leggett
County Executive

David E. Dise
Director

December 15, 2016

Mr. Casey Anderson, Chair
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re: Rock Spring Plan Master Plan Public Hearing Draft

Dear Mr. Anderson:

Thank you for the opportunity to review and comment on the Public Hearing Draft of the Rock Spring Master Plan.

Technical comments from the Departments of Transportation, Environmental Protection and Recreation are attached for your review. The Department of Transportation also included a cover memo highlighting their most pressing issues.

Thank you for your consideration. Please contact me directly if you have any questions.

Sincerely,

Greg Ossont
Deputy Director

cc: Gwen Wright, Planning Director
Nancy Sturgeon, M-NCPPC
Ken Hartman, RSC

MEMORANDUM

December 9, 2016

TO: Greg Ossont, Deputy Director
Department of General Services

FROM: Christopher Conklin, P.E., Deputy Director for Policy
Department of Transportation

SUBJECT: Rock Spring Master Plan – MCDOT Comments

Thank you for the opportunity to review the October 2016 Planning Board Public Hearing Draft of the Rock Spring Master Plan. MCDOT supports the vision of the plan but believe the plan – in its current state – needs some additional considerations. To highlight our most pressing points from the detailed page-by-page comments attached:

- 1) **North Bethesda Transitway (NBT):** The plan appears to state that the NBT will connect to Grosvenor Metro Station. As per the Countywide Transit Corridor Functional Master Plan we believe that Grosvenor should remain only 1 of 2 options – with the other being White Flint – until further analyses are completed.
- 2) **LATR / TPAR Analyses:** Provide 2016 LATR and 2012 TPAR Roadway analyses and findings. If both tests pass, this strengthens the case for the proposed road diets and can make implementation proceed more smoothly through their respective public processes.
- 3) **Internal Superblock Streets:** We believe that proposed internal streets within the superblocks should be treated as new streets, shown in Table 1 and Figure 17 accordingly and listed as being either public or private streets. Showing them in the plan will help guide new development in establishing the layouts and configurations of the streets, and across the area this can help provide a more unified network capable of dispersing traffic across a grid.
- 4) **Cross-Section Standards:** Provide the nearest cross-sections for each non-SHA roadway segment in Table 1, as well as a list of any proposed changes to minimum rights-of-way. Where there is not a precise cross-section, provide the nearest cross-section and append the number with “mod”. Ideally, each modification should be accompanied by a note or footnote describing the intent of the modification.

- 5) **I-270:** We support the inclusion of the ramps between Fernwood Rd / Westlake Terrace and I-270 to the south. We also suggest that consideration be given toward reducing the radius of the ramp from westbound Democracy Blvd onto northbound I-270.
- 6) **Funding Mechanism:** Consider whether any special funding mechanism may be suitable for the plan area for NADMS-focused projects, such as transit services, road diets, Bikeshare, etc.

Should you have any questions regarding our comments on the Rock Spring Master Plan, please feel free to contact me or Mr. Andrew Bossi, Senior Engineer, at 240-777-7200.

CC:AB:kcf

Attachments: detailed technical comments

cc: Al Roshdieh, MCDOT
Gary Erenrich, MCDOT
Andrew Bossi, MCDOT
Amy Donin, DGS

Agency	Division	Team	Commenter	PDF Page #	Section	Comment
MCDOT	DO	Commuter Services	SB	General		Consider whether a special funding mechanism may be suitable for the Plan area for funding NADMS-focused projects, such as the Rock Spring Park Express Bus Service, North Bethesda Transitway capital or operations, road retrofits necessary to create a more bike- and ped-friendly environment, Bikeshare throughout the Plan area, and other components of a comprehensive TMD program (which could be jointly branded with the Activate Rock Spring initiative noted on p51).
MCDOT	DO	Devel Rvw	GL	14,32		Significant frontage and off-site roadway treatments were required for the Westfield Montgomery Mall (plan numbers 120050180 and 820050030), including shared use path & bike lanes along Westlake Dr, and widened sidewalks along Westlake Ter. The Plan should acknowledge those projects and address the status of plan approval.
MCDOT	DO	Devel Rvw	GL	18	Transportation & Connectivity	3rd bullet - Recommend revising the street name to Westlake Terrace for consistency with various maps (p51, and Table 1).
MCDOT	DO		AB	23, 58	Connectivity	Be mindful of the role of the most recent regulations regarding private streets. In the 1st bullet on p23, delete the phrase "public or private" so it reads "Expand the existing street network with new streets that are walkable and well connected."
MCDOT	DO	Devel Rvw	GL	50		Regarding the midblock crosswalk on Rock Spring Dr at Walter Johnson HS - Significant discussion and infrastructure requirements were conditioned of the Avalon Bay developer at the site plan (82000034A) stage, including construction of a fence/wall in the median (to channel pedestrians to a proposed signalized intersection). The report should acknowledge this project and address the status of that plan approval.
MCDOT	DO		AB	51	Goal 4	Need to identify missing ped/bike connections, as these should be reflected in the CIP listing (p69). While this bullet states that Figure 15 shows such connections as green links, note that Figure 15 does not appear to show either existing nor missing connections.
MCDOT	DO		AB	55-56	Transit Network	Provide information the 2012 TPAR Transit test. While each metric is operational, these provide a good snapshot of Existing conditons & the needs as the plan area develops.
MCDOT	DO		AB, DB	55-56	Transit Network	Providing a map showing existing and proposed transit connections. Proposed BRT station areas should not be mere "dots on a map", but should be lengthened to provide a more informative indication of a transit station's length of ROW impacts. Note that as we do not currently have any detailed design for the Transitway, we must err on the side of caution and recommend more ROW-intensive median platform stations (similar to a linear-shaped leaf, rather than a simple rectangle as would be the case with side platforms).
MCDOT	DO		AB	56,69	Transit Network	It appears that this plan appears to assert that the North Bethesda Transitway will terminate at Grosvenor Metro Station rather than White Flint Metro Station. Please confirm. We urge that this remain only 1 of 2 options, as defined in the Countywide Transit Corridor Functional Master Plan.
MCDOT	DO	Commuter Services	SB	56	Transit Network	Consider expanding upon the 2nd to last paragraph to specify that not only are the unbuilt ramps onto southbound 270 spur intended to facilitate transit, but the recently built transit center was explicitly located at its present location to make use of these future connections.
MCDOT	DO		AB	57-58	Roadway Network	Consider whether the plan should propose reducing the radius of the ramp from westbound Democracy onto the northbound I-270 Spur.
MCDOT	DO	Devel Rvw	GL	58-59	Roadway Network	Consider how bus stops will be accommodated along separated bike paths, and how this may affect parking, buffers / SWM, and sidewalks. Note the recent discussion w/ Washington Adventist Hospital in White Oak, along Plum Orchard Dr, where shifting the curb lines was deemed to be an unnecessary expense versus eliminating on-street parking.
MCDOT	DO		AB	58-61	Roadway Network	A preliminary working draft of this map showed a number of potential private street locations. We believe that some of these roadways have merit in helping to break up the superblocks and that they should be shown on this map as new streets. These streets may be listed as public or private (depending on criteria established by the subdivision regulations). By showing these streets we can more comprehensively lay these streets out in a rational and unified manner so that they may best serve the needs of the area, easing the development review process as layouts and configurations for the streets are established.
MCDOT	DO		AB, RT	58	Roadway Network	Provide 2016 LATR and 2012 TPAR Roadway analyses and findings. If both tests pass, this strengthens the case for the proposed road diets and can make implementation proceed more smoothly through their respective public processes. If either of the tests fail, it is an indication that more evaluation and infrastructure may be necessary to achieve the vision of the plan, or acts to raise awareness if the plan is approved with acknowledgment of potential impacts to congestion.
MCDOT	DO	Devel Rvw	RT	58	Roadway Network	Confirm that any transportation analyses are not exclusively based on Existing conditions, but noting the purported vacancy rates for the area: transportation analyses should account for the unused potential of underutilized properties under Existing conditions.
MCDOT	DO	Devel Rvw	GL	58	Roadway Network	Clarify if the analysis' findings are dependent on implementation of the North Bethesda Transitway. That is: can some/all lane diets occur prior to operation of the transitway or must the transitway come first?
MCDOT	DO	Devel Rvw	GL	58	Roadway Network	More clearly delineate I-270.
MCDOT	DO		AB	58	Roadway Network	Show the private street connection proposed between B-7 and B-8 (as noted on p34). Note, however, that as this connects the termini of two existing public streets we believe this street should be public. If private, B-7 and B-8 will each need public turnarounds.
MCDOT	DO		AB	59	Roadway Network	Edit the 2nd part of the 1st sentence to read "...including reconstructing the curbs and accompanying drainage system"
MCDOT	DO		AB	59	Roadway Network	In Cross-Section 2, Consider how the 5 ft buffer beside the parking lane may be designed & used as a public space. If separated from the parking lane by a white line it is possible that bicyclists may use this as a bike lane, despite the presence of the cycle track and risk of the passenger-side door zone.
MCDOT	DO		AB	59	Roadway Network	If legibility can be preserved, it may be helpful for the common 80 ft ROW between the two cross-sections to align vertically with each other.
MCDOT	DO	Devel Rvw	RT	59	Roadway Network	Cross-Section 1 has 5 ft buffers and an 8 ft median between the roadway and bikeway. Note that buffers of between 4 to 6 ft are restricted to small trees only, and such small widths will not be able to adequately function as stormwater management facilities. Furthermore, the cross-section should give consideration as to where utilities would be located.

					Provide the nearest cross-sections for each non-SHA roadway segment and denote the number of travel lanes intended.	
					As separated bike lanes and shared use paths are not included in any of the approved Context Sensitive Road Design Standards, it is anticipated that there will not be an exact CSRDS for each roadway. Where there is not a precise cross-section, provide the nearest cross-section and append the number with “mod”. Ideally, each modification should be accompanied by a note or footnote describing the intent of the modification.	
MCDOT	DO	AB, GL	60-61	Roadway Network	Alternately, providing cross-sections either in the main document or in the appendix will help establish intention &/or act as proof of concept. In general, it is our preference that dimensioned cross-sections be located in the Appendix, as providing dimensioned cross-sections in the plan itself can be interpreted as rigidly fixing those dimensions as requirements, limiting flexibility should standards change.	
					Referencing road design standards can be a useful method of quickly identifying a plan’s intent with the ROW, be it for car lanes, parking, bike lanes, sidewalks, landscaping, etc. (especially helpful where stipulated ROW is greater than what is called for in a standard).	
MCDOT	DO	AB	60	Roadway Network	There are two instances of "West Lake" rather than what appears to be the convention of "Westlake"	
MCDOT	DO	AB	60	Roadway Network	Consider including I-270 in Table 1, with an associated ROW requirement.	
MCDOT	DO	AB	61		re: Protected Intersections - Note that additional ROW may come in the form of larger intersection/corner truncations.	
MCDOT	DO	AB	61	Roadway Network	In the footnote *, include "transit stations" as a potential need for additional ROW.	
MCDOT	DO	Devel Rvw	GL	61	Roadway Network	Clarify why P-5 and P-8 are included in the table if they are located outside of the Plan area. However, if they are going to be included in the table, they should also be included in Figure 17 on page 58.
MCDOT	DO	AB	62	Roadway Network	At the end of the 2nd paragraph consider noting that this Bike/Ped Priority Area is not currently state-designated.	
MCDOT	DO	Commuter Services	SB	62	Bicycle Network	Consider strengthening the paragraph on Capital Bikeshare stations. The Plan could recommend that major new projects be required to pay for Bikeshare stations and operating costs, and that others will be required to contribute to the cost of the network on a proportional basis. specific siting will be dependent upon each project's plans and will need to be determined by the operator of the bikeshare network (MCDOT).
MCDOT	DO	Commuter Services	SB	62	Bicycle Network	Be mindful that while the Plan states that Bikeshare will help connect the Plan area with "all of the residential neighborhoods in the area", unless a funding mechanism is identified it is unlikely that all the surrounding communities (particularly those consisting primarily of SFDUs) will have Bikeshare within a short distance. Consider rephrasing that it will connect "many of the higher density residential communities in the area"
MCDOT	DO	AB	63	Bicycle Network	Consider the neet to show SR-36, as designating Shared Roadways offers no functional need other than for wayfinding purposes.	
MCDOT	DO	AB	63	Bicycle Network	Consider whether there is a need for improved bicycle facilities between the plan area and Grosvenor Metro Station. While it would be outside the plan area, it may be important to reference any needs for improved facilities even if this plan does not explicitly propose them.	
MCDOT	DO	AB	63	Bicycle Network	Include a Bicycle Level of Stress map in the appendix, showing Existing vs Build-Out conditions.	
MCDOT	DO	AB	65	Pedestrian Network	Note that exclusive phases for bicycles and pedestrians may affect the overall capacity of an intersection. To the extent feasible, this should be reflected (or otherwise acknowledged) in any LATR analyses.	
MCDOT	DO	Commuter Services	SB	66	TDM	The Plan states that the TMD spans only to the east of the 270 Spur, but the TMD includes the Mall. We suggest including a map showing the TMD, as well as any other applicable policy-oriented areas.
MCDOT	DO	Commuter Services	SB	66	TDM	The Plan discusses only staff assistance to employers (and implicitly employees), citing 39% NADMS goal for employees. However, the TMD also provides assistance to residents and property owners of multiunit residential projects, including an NADMS goal for residentially-based commuting, as well.
MCDOT	DO	AB	69		As was done with Bethesda, we urge that a listing of CIP Projects be provided, along with identified lead stakeholders. We noted the following transportation projects, though caution that this may not be a comprehensive list: - p51, Goal 3 - ped/bike connections across 270 spur along Westlake Ter - p51, Goal 4 - missing ped/bike connections (need to be identified) - p57 - HOV Ramps from Fernwood Rd to I-270 Spur SB. - p56 - North Bethesda Transitway between Grosvenor Metro & Montgomery Mall - p57 - Express Bus between North Bethesda, Montgomery Mall, and Tysons - p57-61 - Reclassification from Arterial to Business (B-1, B-2, B-3) (and associated long-term as well as interim treatments) (and impacts to the Westlake bridge over the I-270 Spur) - p57-61 - Reclassification from Unclassified to Business (B-4, B-5, B-6, B-7, B-8) - p57-61 - Reclassification from Primary Res to Minor Arterial for MA-5 - p57-61 - B-6 (to be built by redevelopment) - p62 - Bikeshare - p62-65 - All unbuilt bikeways (cycletracks may be cross-referenced with reclassification projects resulting from p57-61) - p65 - BiPPA Costs associated with Ped Upgrades, Retrofits, ADA Treatments, Protected Intersections, Signal Reconstructions & Retrofits, Signal Timing Studies - p66 - Removal of R-turn channelization at: Democracy/Bells Mill, Democracy/Rockledge Dr, Democracy/Fernwood, Democracy/Westlake, 187/Rock Spring, Rockledge/Rockledge - p66 - Rock Spring @ Walter Johnson HS Midblock Crosswalk - p66 - County costs toward the TDM	

**DEP Comments on
Rock Spring Master Plan
October 2016 Public Hearing Draft**

1. **General**: Introduction focuses on background and history and office market challenges, but lacks any mention of stormwater or sustainability opportunities and challenges.
2. **Bottom of Page 11**: Challenges – Recommend adding “lack of green infrastructure and state of the art stormwater management” to the list.
3. **Page 13, Figure 6** – Suggest calling these projects “future” projects rather than “pipeline” projects, or clarify this term better somewhere in the text.
4. **Page 35, Chapter 3** – Recommend adding a figure to show the watershed and drainage areas. The planned stream restoration of the Grosvenor Luxmanor Tributary in fall 2017 should be mentioned. This stream receives drainage from the Rock Spring master plan area and efforts to control and treat stormwater will augment the County’s downstream restoration efforts.
More info: <http://www.montgomerycountymd.gov/DEP/Restoration/grosvenor-luxmanor-stream.html>
5. **Page 36-37, Goals and Objectives** – This section lists 11 objectives that “should be addressed in this Plan.” However, most of the objectives (e.g. 1, 2, 4, 5, and 6) do not appear to be addressed in the recommendations or anywhere else in the Plan.
6. **Page 38, Overall Recommendations** – The second bullet states “Encourage green features (softscaping) in required open space areas and the public realm.” Suggest more specific focus on green infrastructure and low impact development (LID). The same aesthetic can be achieved with the added benefit of improved stormwater management.
7. **Page 38, Topic Specific Recommendations, Water Quality** – Suggest adding bullets:
 - Encourage use of green infrastructure and LID stormwater management in private open areas, public areas, and along roadways to improve water quality to receiving streams.
 - Recommend adding to the quality and quantity of any existing stream channel buffer areas. Examine channel restoration and/or stream daylighting opportunities.
 - Consider additional LID opportunities at Walter Johnson High School
8. **Page 58, Transportation and Connectivity section** – Suggest adding green streets/ LID features such as bioswales and rain gardens along reconstructed roadways.

Donin, Amy

From: Bourne, Jeffrey
Sent: Tuesday, November 08, 2016 11:47 AM
To: Donin, Amy; Ossont, Greg
Cc: Albornoz, Gabriel; Kaarid, William; Riley, Robin
Subject: Re: Comments needed - Rock Spring Master Plan

Recreation - Rock Spring Comments, 11/8/16

Review of the document finds accurate depiction of the park & recreation needs w/l the plan vicinity. Community Recreation services will be provided by the future County development of the North Bethesda Regional Recreation Center which will include the KSAC and a region serving community recreation facility including continuation of the racquetball and dry-land training facilities. This facility will be conveniently located at Wall Park very near the Metro.

One additional note should address the extreme importance of adding parks & open space if the larger Rock Spring area undergoes redevelopment to provide significant med/high density residential construction.

Jeffrey A. Bourne
Chief, Division of Facilities & Capital Programs
Montgomery County Recreation
4010 Randolph Rd.
Silver Spring, MD 20902
O. – 240-777-6800
jeffrey.bourne@montgomerycountymd.gov