



PLANNING COMMISSION

Wednesday, September 11, 2019

7:00 PM

Rockville City Hall

Mayor and Council Chambers

Meeting No. 22-2019

AGENDA

Gail Sherman, Chair

Don Hadley	Anne Goodman
Charles Littlefield	John Tyner, II
Sarah Miller	Rev. Jane E. Wood

Jim Wasilak, Staff Liaison

Cynthia Walters, Deputy City Attorney

Eliot Schaefer, Assistant City Attorney

1. Consent Agenda

- A. Final Record Plat PLT2020-00584 - to Combine Part Lot 3 and Lot 4, Block 5 of the Roxboro Subdivision into One Record Lot in the R-60 Zone at 101 Aberdeen Road; Maddox Engineering and Surveyors, Applicant.

2. Work Session

- A. Work Session 5: Comprehensive Plan: Draft for Planning Commission Public Hearing

3. Commission Items

A. Staff Liaison Report

B. Old Business

C. New Business

D. Minutes Approval

December 12, 2018

E. FYI/Correspondence

4. Adjourn

HELPFUL INFORMATION FOR STAKEHOLDERS AND APPLICANTS

I. GENERAL ORDER OF SESSION FOR DEVELOPMENT APPLICATIONS

1. Staff presentation
2. City Board or Commission comment
3. Applicant presentation (10 min.)
4. Public comment (3 min, or 5 min for the representative of an association)
5. Planning Commission Discussion and Deliberation
6. Decision or recommendation by vote

The Commission may ask questions of any party at any time during the proceedings.

II. PLANNING COMMISSION BROADCAST

- Watch LIVE on Comcast Cable Rockville Channel 11 and online at: www.rockvillemd.gov
- Replay on Comcast Cable Channel 11:
 - Wednesdays at 7:00 pm (if no live meeting)
 - Sundays at 7:00 pm
 - Mondays, Thursdays and Saturdays at 1:00 pm
 - Saturdays and Sundays at 12:00 am (midnight)
- Video on Demand (within 48 hours of meeting) at: www.rockvillemd.gov/VideoOnDemand.

III. NEW DEVELOPMENT APPLICATIONS

- For a complete list of all applications on file, visit: www.rockvillemd.gov/DevelopmentWatch.

VI. ADDITIONAL INFORMATION RESOURCES

- Additional resources are available to anyone who would like more information about the planning and development review process on the City’s web site at: www.rockvillemd.gov/cpds.

Maryland law and the Planning Commission's Rules of Procedure regarding ex parte (extra-record) communications require all discussion, review, and consideration of the Commission's business take place only during the Commission's consideration of the item at a scheduled meeting. Telephone calls and meetings with Commission members in advance of the meeting are not permitted. Written communications will be directed to appropriate staff members for response and included in briefing materials for all members of the Commission.



Agenda Item #:	A
Meeting Date:	September 11, 2019
Responsible Staff:	Nicole Walters

SUBJECT:

Final Record Plat PLT2020-00584 - to Combine Part Lot 3 and Lot 4, Block 5 of the Roxboro Subdivision into One Record Lot in the R-60 Zone at 101 Aberdeen Road; Maddox Engineering and Surveyors, Applicant.

RECOMMENDATION

(Include change in law or Policy if appropriate in this section):

Staff recommends approval, based on compliance with the required criteria in Section 25.21.03 of the Zoning Ordinance for the recordation of an existing single unit detached dwelling residential lot.



Overview

Case: Final Record Plat Application PLT2020-00584

Location: 101 Aberdeen Road, Rockville, MD 20852

Staff: Nicole Walters
Planning and Development Services
240-314-8215
Nwalters@rockvillemd.gov

Applicant: Magnus Caywood
Maddox Engineering and Surveyors
3204 Tower Oaks Boulevard
Rockville, MD 20852

Filing Date: July 8, 2019

Executive Summary: The applicant proposes a resubdivision in order to combine part lot 3 and lot 4 in the Roxboro subdivision, into a single record lot of 11,909 square feet.

Site Description

Master Plan Land Use:
 Zoning District: R-60, Single Unit Detached Dwelling, Residential Zone
 Existing Use: Single Family
 Plat Area: 11,909 square feet (part lot 3 = 3,802 sq. ft.; Lot 4 = 8,107 sq. ft.)
 Subdivision: Roxboro

Project Vicinity

Surrounding Land Use and Zoning

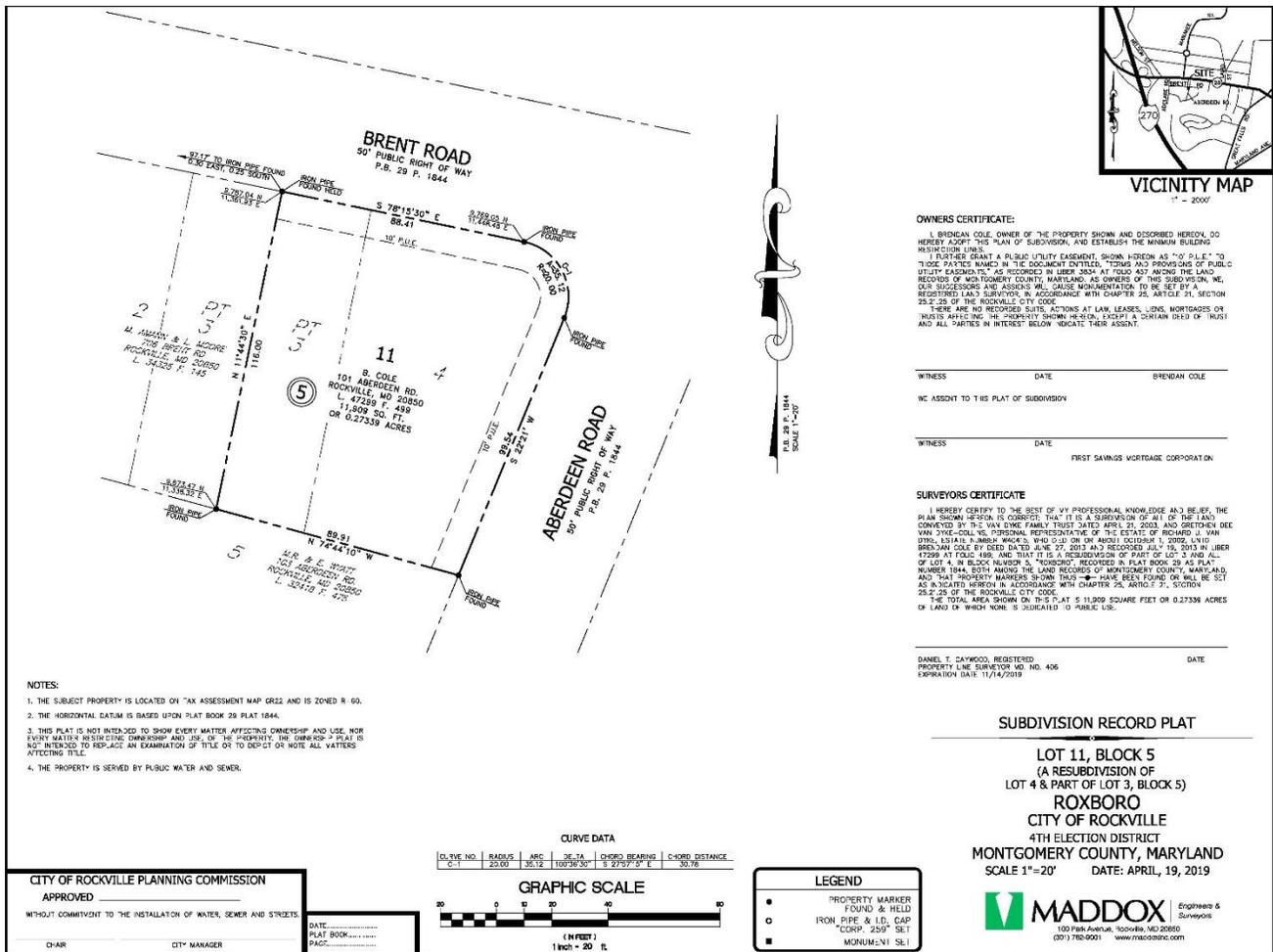
	Zoning	Planned Land Use	Existing Use
North	R-60, Single Unit Detached Dwelling, Residential Zone	Detached Residential, (High Density, Over 4 Units Per Acre)	Single Unit Detached Residential
East	R-60, Single Unit Detached Dwelling, Residential Zone	Detached Residential, (High Density, Over 4 Units Per Acre)	Single Unit Detached Residential
South	R-60, Single Unit Detached Dwelling, Residential Zone	Detached Residential, (High Density, Over 4 Units Per Acre)	Single Unit Detached Residential
West	R-60, Single Unit Detached Dwelling, Residential Zone	Detached Residential, (High Density, Over 4 Units Per Acre)	Single Unit Detached Residential

Previous Related Actions

Variance Application VAR2019-00073, a request to allow a proposed addition to project into the rear yard and intersect with the existing accessory building. Approved by the Board of Appeals on March 7, 2019.

Proposal

The applicant, Maddox Engineering and Surveyors, on behalf of the homeowner, is requesting approval of a Final Record Plat to combine part of Lot 3 and Lot 4 of the Roxboro subdivision into one (1) single record lot that will be known as Lot 11. This property has existed in the same configuration since 1957, and therefore qualifies as a “recording of existing single unit detached residential lot”, pursuant to Section 25.21.03 of the Zoning Ordinance. The property will continue to function as a property for a single family detached dwelling unit with the approval of this plat.



Proposed Plat

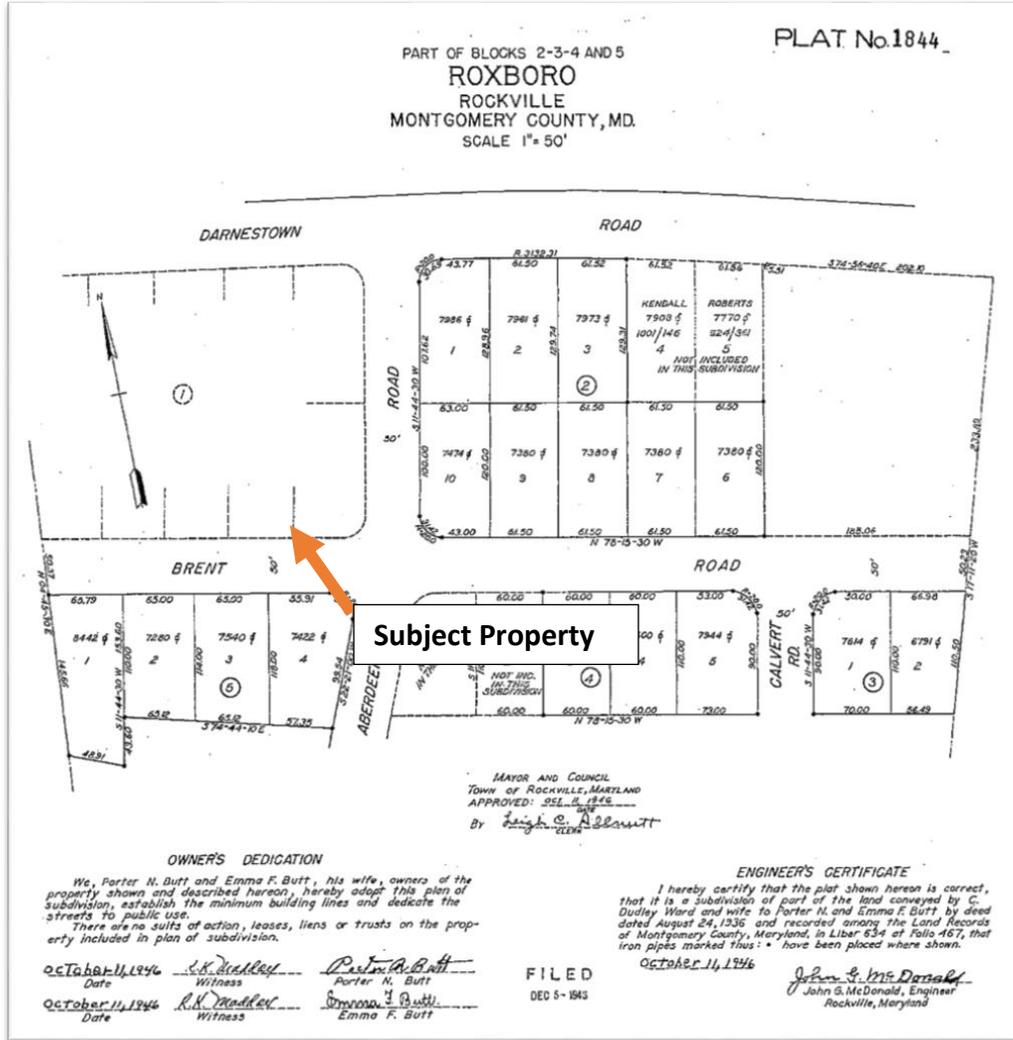
Property Description and Background

The plat for this portion of the Roxboro subdivision was recorded in 1943. The subject property at 101 Aberdeen Road currently includes one-half of Lot 3 and Lot 4 within Block 5 of the subdivision. These properties were combined by deed in 1953. Information obtained from the Tax Assessors database indicates that the house was constructed in 1948.

The property is zoned R-60, Single Unit Detached Dwelling Residential, and is a corner lot with frontage on Aberdeen Road and Brent Road. The Aberdeen Road frontage serves as the property's front yard and the Brent Road frontage serves as the functional side yard. Vehicular access to the site is via Aberdeen Road. The property is improved with a one-story detached dwelling with a basement. The property has a detached garage and open wooden front porch along most of the front facade. The lot appears to be relatively flat and has several mature trees and shrubs on the property.

On March 7, 2019, the Board of Appeals granted a variance (VAR2019-00073) to allow for a proposed addition to project into the rear yard beyond the front building line of the existing

accessory building (detached garage). As part of this variance approval, a condition required the consolidation of the lots before a building permit can be released, as setbacks are measured from the record lot lines.



Original Subdivision Plat 1943

Project Analysis

Master Plan Recommendation

The Master Plan envisions Planning Area 4, the West End and Woodley Gardens East-West Neighborhood, as primarily a single-unit residential, medium-density neighborhood, with varied institutional uses within the neighborhood. Neither the 2002 Comprehensive Master Plan nor

the 1989 Neighborhood Plan provide any specific goals that affect this plat application.

Infrastructure/ Adequate Public Facilities Standards (APFS)

The plat represents no new development, and therefore there will be no impact on public facilities.

Historic Resources

The subject property does not contain any historic resources.

Forest Conservation

A one-lot subdivision does not require that forestry requirements be met at this time. If future development on the lot were to require compliance with the Forest and Tree Preservation Ordinance, the requirement would need to be met prior to the issuance of a Building Permit.

Zoning Ordinance Compliance

Section 25.21.03.b of the Zoning Ordinance indicates that the Planning Commission must approve a plat that seeks to record an existing single unit detached dwelling property only when one or more of the following conditions are met and the plat has frontage as required in the zone or public access to a public street.

1. The property being platted is a deeded lot that has existed in the same figuration since at least October 1957;
2. The property being platted is:
 - (a) a multiple-lot property that is required a minimum of two (2) lots for development at the time the substandard lots were created,
 - (b) the property has been under common ownership since at least October 1957, and
 - (c) the plat seeks to consolidate the lots into a single record lot;
3. The property being platted is a multiple-lot property that contains an existing house that straddles the common lot line and the plat seeks to consolidate the property into a single record lot.

The subject property has existed in the same configuration and under common ownership since at least October 1957, having been combined by deed in 1953. The plat seeks to consolidate the lots into a single record lot and the property being platted is a multiple-lot property that contains an existing house that straddles the common lot line, and the plat seeks to consolidate the property into a single record lot. The property exceeds the minimum frontage required in the zone and has public access to a public street. The subject plat application therefore meets all of the criteria for recording an existing residential property, per Sec. 25.21.03 of the Zoning Ordinance.

Community Outreach

Public Notification of the Final Record Plat was provided pursuant to the requirements of Section 25.21.11.d ("Notice"). Mailed notification was provided by the applicant to all residents

and property owners within the required 750-foot radius. Per Section 25.21.11 all interested parties are given 15 days from the date of the letter (8-22-19) to provide comments. Additionally, mailed notification was made to the West End Citizens Association, the Rose Hill Falls Community Association, the Rose Hill Homeowners Association, and the Thirty Oaks Homeowners Association. No posting of signs on the property is required. At the time the staff report was prepared (September 3, 2019), no written or verbal public comments have been received regarding this application.

Recommendation

Based on the above, staff finds that the Final Record Plat meets the required criteria the Commission needs in order to approve the plat as the recordation of an existing single unit detached dwelling residential lot. Staff recommends approval of Final Record Plat PLT2020-00584, based on analysis indicated and subject to the listed conditions.

Conditions

Approval is recommended subject to the following conditions:

1. The applicant has addressed staff comments, however, the plat should be revised to make modifications/additions, as identified by the Planning Commission.
2. That the Final Record Plat be submitted in an appropriate electronic format as specified in Section 25.21.1.0d of the City of Rockville Zoning Ordinance.

Attachments

Attachment 1.A.a: Applicant Submission materials



Case Number: VAR2019-00073

Address: 101 Aberdeen Road

Project Name: To allow for the main dwelling to intersect with the detached structure

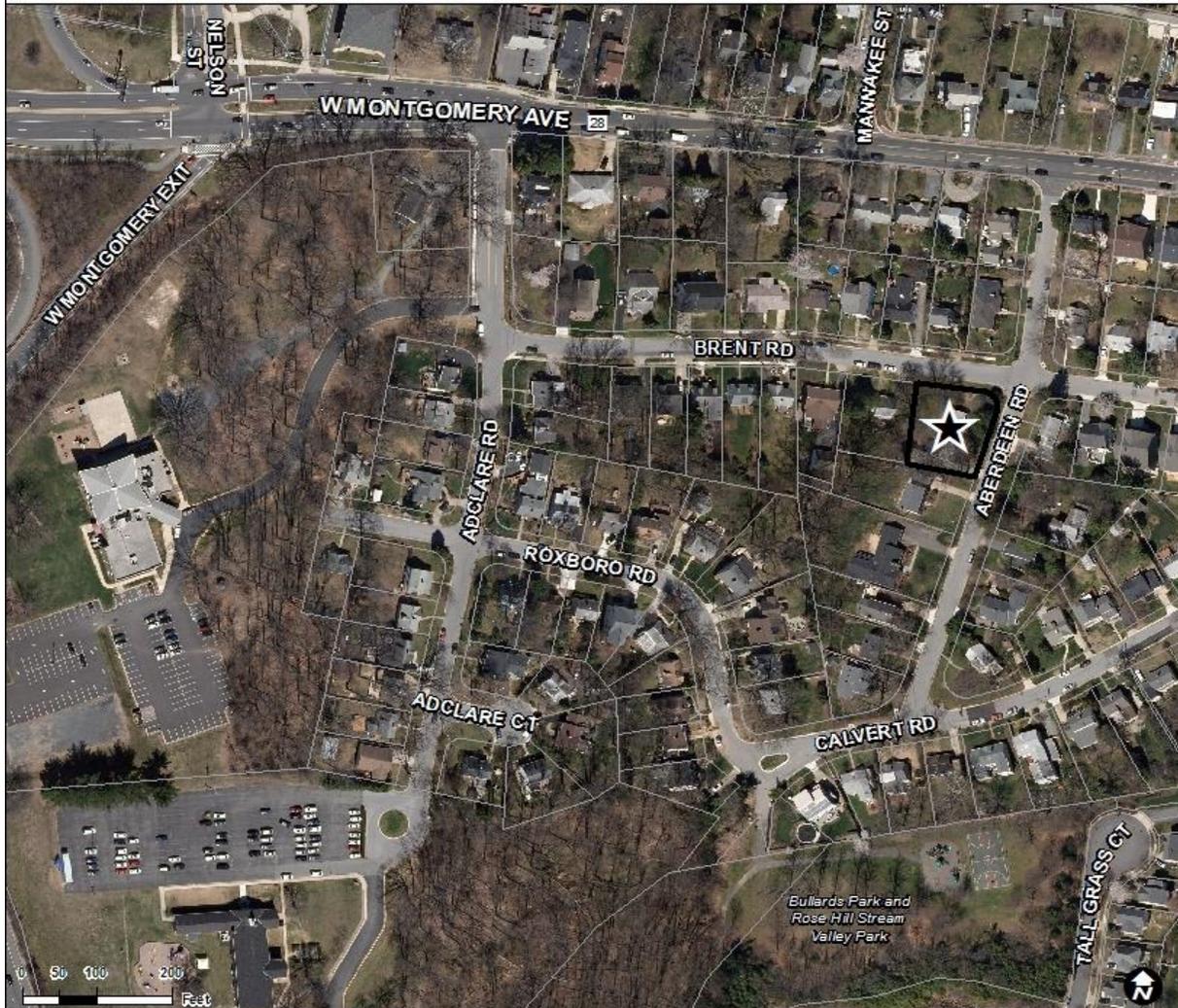
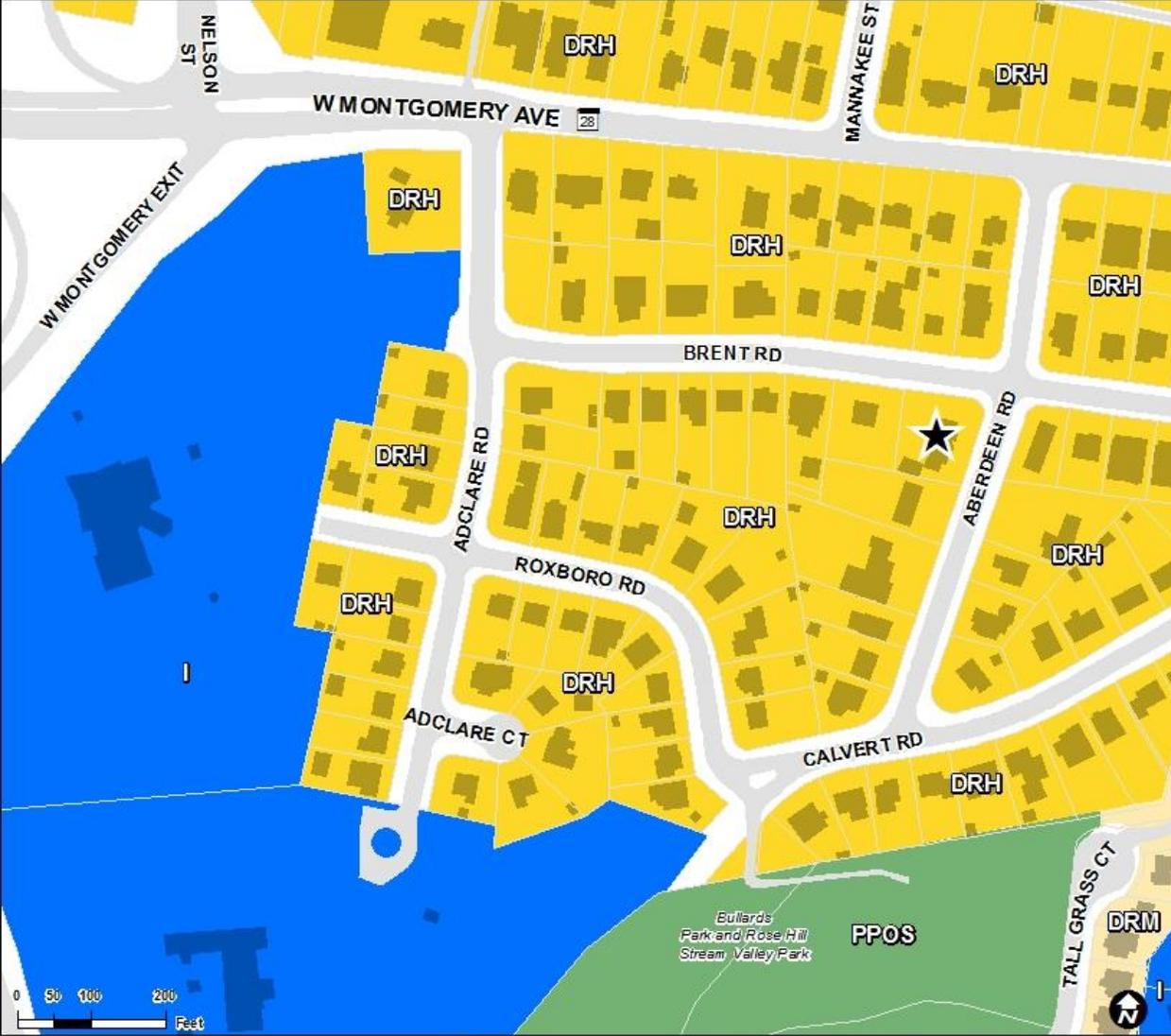


Exhibit 2


Case Number: VAR2019-00073
Address: 101 Aberdeen Road
Project Name: To allow for the main dwelling to intersect with the detached structure



Master Plan Land Uses

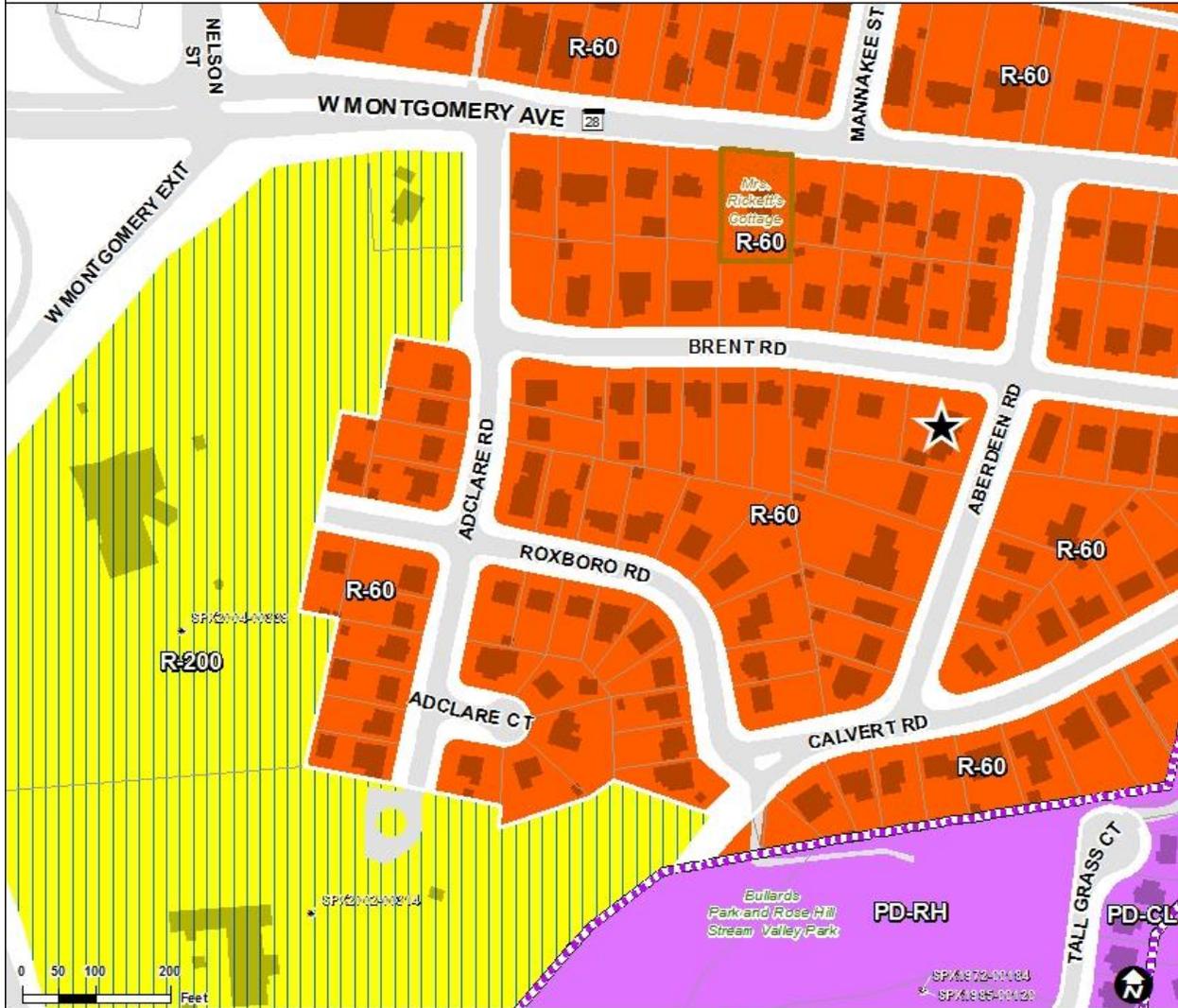
- DRL - Detached Residential (Low Density)
- DRM - Detached Residential (Medium Density)
- DRH - Detached Residential (High Density)
- GA - Garden Apartments
- AR - Attached Residential
- HRA - High Rise Apartments
- NC - Neighborhood Commercial
- GC - General Commercial
- EC - Entertainment Corridor
- PRSFD - Preferred Residential - Single-family Detached
- PRSFA - Preferred Residential - Single-family Attached
- PRSFAD - Preferred Residential - Single-family Attach/Detach

- PRMF - Preferred Residential - Multi-family
- PC - Preferred Commercial
- POLW - Preferred Office/Live Work Space
- PO - Preferred Office
- MUPO - Mixed-Use Preferred Office
- MUPR - Mixed-Use Preferred Residential
- MR - Mixed Residential
- MUC - Mixed Use Commercial
- MUD - Mixed Use Development
- MUI - Mixed Use Industrial
- PBF - Public Buildings and Facilities
- PI - Public and Institutional
- I - Institutional

- PRCA - Private Recreational and Conservation Area
- POS - Private Open Space
- PPOS - Public Park and Open Space
- RPCMUD - Rockville Pike Corridor Mixed-Use Development
- RP-N - Rockville Pike Neighborhood
- RP-CD - Rockville Pike Corridor
- RP-CE - Rockville Pike Center
- RP-CR - Rockville Pike Core
- CPD - Comprehensive Planned Development
- RIOP - Restricted Industrial / Office Park
- SI - Service Industrial
- RRW - Rail Right-of-Way

Exhibit 3


 Case Number: VAR2019-00073 Address: 101 Aberdeen Road
 Project Name: To allow for the main dwelling to intersect with the detached structure



<p>Zoning Overlays</p> <ul style="list-style-type: none"> Town Center Performance District South Pike Rockville Pike Core Twinbrook Metro Performance District Lincoln Park Conservation District Planned Developments Residential Clusters Local Historic Districts * Special Exceptions 	<p>Zoning Districts</p> <ul style="list-style-type: none"> R-400 - Residential Estate R-200 - Suburban Residential R-150 - Low Density Residential R-90 - Single Unit Detached Dwelling, Restricted Residential R-75 - Single Unit Detached Dwelling, Residential R-60 - Single Unit Detached Dwelling, Residential R-40 - Single Unit Semi-detached Dwelling, Residential RMD-10 - Residential Medium Density RMD-15 - Residential Medium Density RMD-25 - Residential Medium Density 	<ul style="list-style-type: none"> MXB - Mixed-Use Business MXC - Mixed-Use Commercial MXCT - Mixed-Use Corridor Transition MXCD - Mixed-Use Corridor District MXE - Mixed-Use Employment MXNC - Mixed-Use Neighborhood Commercial MXT - Mixed-Use Transition MXTD - Mixed-Use Transit District PARK - Park Zone IL - Light Industrial PD - Planned Development
---	---	---



Application for **Subdivision Plan**

RECEIVED
JUL 08 2019
COMMUNITY PLANNING AND DEVELOPMENT SERVICES

PLT
2/09

City of Rockville
Department of Community Planning and Development Services

111 Maryland Avenue, Rockville, Maryland 20850
Phone: 240-314-8200 • Fax: 240-314-8210 • E-mail: Cpds@rockvillemd.gov • Web site: www.rockvillemd.gov

Type of Application Recordation / Consolidation of Existing Lots

Preliminary Plan _____ Ownership Plat _____ Final Record Plat _____ Cluster Development _____

Please Print Clearly or Type

Property Address Information 101 ABERDEEN RD, ROCKVILLE MD, 20850

Property Size (square feet) 11,192 Lot (S) 4 & PT 3

Zoning _____ Tax Account (S) 00208730

Proposed Subdivision CONSOLIDATION Lot 4 & PT LOT 3 Block 5

Applicant Information:

Please supply Name, Address, Phone Number and E-mail Address

Applicant MADDOX ENGINEERS & SURVEYORS INC | AGENT MAGNUS CAYWOOD |
mgcaywood@maddoxinc.com | 240-696-7792 | 3204 Tower Oaks Blvd Rockville MD 20852

Property Owner BRENDAN COLE
brendan.cole@gmail.com 202-288-6644

Architect N/A

Engineer N/A

Attorney N/A

STAFF USE ONLY

Application Acceptance:

Application # PLT2020-00584
Date Accepted _____
Staff Contact _____

OR

Application Intake:

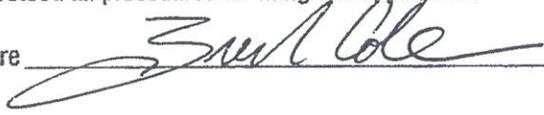
Date Received 7/8/2019
Reviewed by _____
Date of Checklist Review _____
Deemed Complete: Yes No

Attachment 1.A.a: Applicant submission materials (2793 : PLT2020-00584 - Recordation of Existing Lot)

Project Identification ROXBORO - RECORDATION / CONSOLIDATION OF EXISTING LOTS

Application is hereby made with the City of Rockville Planning Commission for appeal of a Subdivision Plan for the property described on page 1.

A letter of authorization from the owner must be submitted if this application is filed by anyone other than the owner.
I hereby certify that I have the authority to make this application, that the application is complete and correct and that I have read and understood all procedures for filing this application.

Please sign here 

Comments on Submittal: (For Staff Use Only):



Attachment 1.A.a: Applicant submission materials (2793 : PLT2020-00584 - Recordation of Existing Lot)

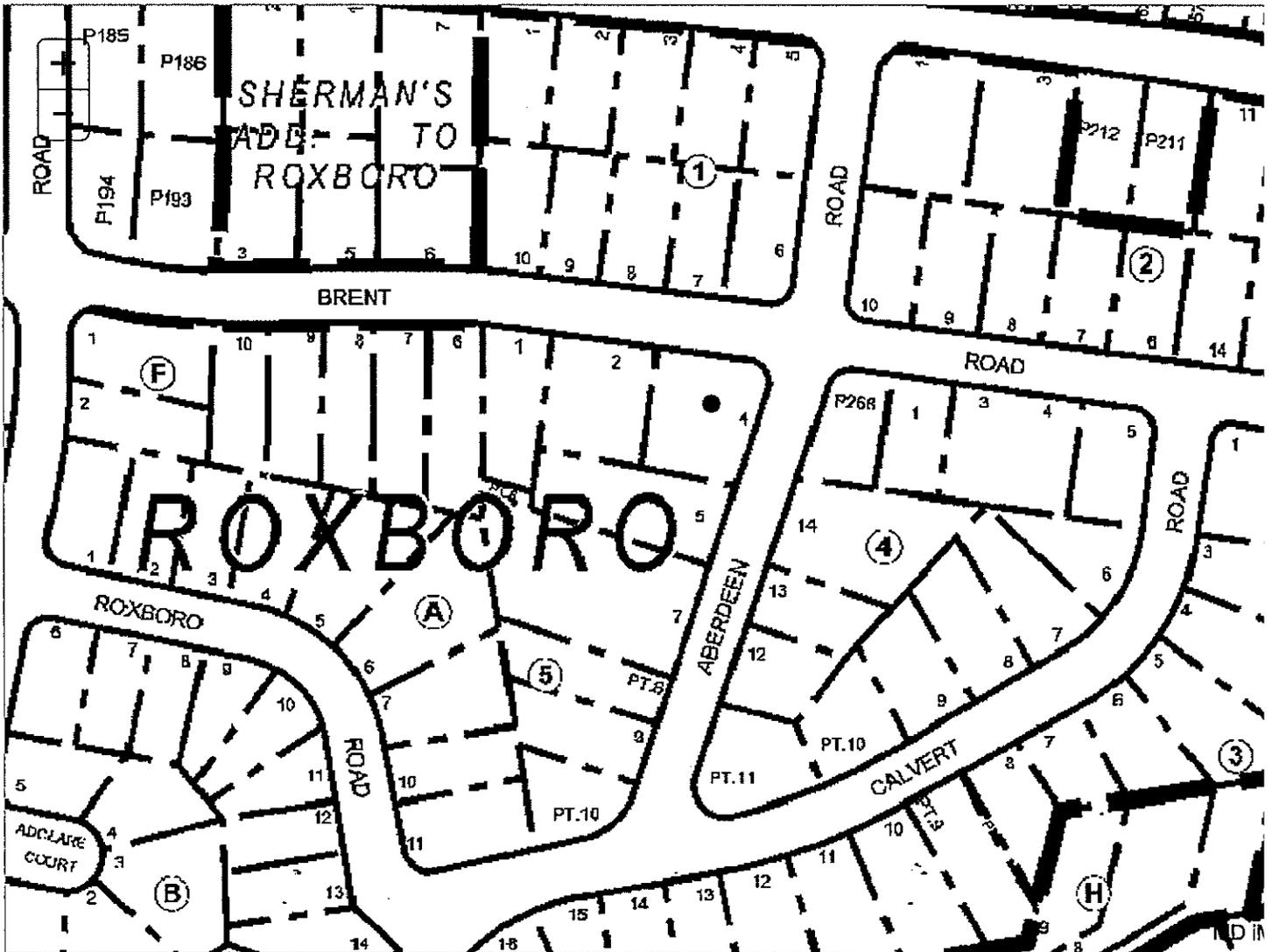
Real Property Data Search

Search Result for MONTGOMERY COUNTY

View Map	View GroundRent Redemption	View GroundRent Registration
Tax Exempt:		Special Tax Recapture:
Exempt Class:		NONE
Account Identifier:		District - 04 Account Number - 00208730
Owner Information		
Owner Name:	COLE BRENDAN	Use: RESIDENTIAL
Mailing Address:	101 ABERDEEN ROAD ROCKVILLE MD 20850-	Principal Residence: YES
		Deed Reference: /47299/ 00499
Location & Structure Information		
Premises Address:	101 ABERDEEN RD ROCKVILLE 20850-0000	Legal Description: PT LT 3 ROXBORO
Map:	Grid:	Parcel:
GR22	0000	0000
Sub District:	Subdivision:	Section:
	0228	
Block:	Lot:	Assessment Year:
5	4	2019
Plat No:	Plat Ref:	
Special Tax Areas:	Town:	ROCKVILLE
	Ad Valorem:	
	Tax Class:	50
Primary Structure Built	Above Grade Living Area	Finished Basement Area
1948	1,572 SF	
		Property Land Area
		11,192 SF
		County Use
		111
Stories	Basement	Type
1	YES	STANDARD UNIT
Exterior	Full/Half Bath	Garage
FRAME	2 full	1 Detached
		Last Major Renovation
Value Information		
	Base Value	Value
		As of
		01/01/2019
Land:	324,900	357,300
Improvements	131,500	139,400
Total:	456,400	496,700
Preferential Land:	0	
		Phase-in Assessments
		As of
		07/01/2018
		As of
		07/01/2019
		456,400
		469,833
		0
		0
Transfer Information		
Seller: VAN DYKE THOMAS E ET AL TR	Date: 07/23/2013	Price: \$525,000
Type: ARMS LENGTH IMPROVED	Deed1: /47299/ 00499	Deed2:
Seller: VAN DYKE, RICHARD U ET AL	Date: 06/19/2003	Price: \$162,500
Type: NON-ARMS LENGTH OTHER	Deed1: /24262/ 00062	Deed2:
Seller: R U & B P VANDYKE	Date: 11/01/1995	Price: \$0
Type: NON-ARMS LENGTH OTHER	Deed1: /13730/ 00208	Deed2:
Exemption Information		
Partial Exempt Assessments:	Class	
County:	000	07/01/2018
State:	000	07/01/2019
Municipal:	000	0.00 0.00
		0.00 0.00
Tax Exempt:	Special Tax Recapture:	
Exempt Class:	NONE	
Homestead Application Information		
Homestead Application Status: No Application		

Attachment 1.A.a: Applicant submission materials (2793 : PLT2020-00584 - Recordation of Existing Lot)

District: **04** Account Number: **00208730**



The information shown on this map has been compiled from deed descriptions and plats and is not a property survey. The map should not be used for legal descriptions. Users noting errors are urged to notify the Maryland Department of Planning Mapping, 301 W. Preston Street, Baltimore MD 21201.

If a plat for a property is needed, contact the local Land Records office where the property is located. Plats are also available online through the Maryland State Archives at www.plats.net (<http://www.plats.net>).

Property maps provided courtesy of the Maryland Department of Planning.

For more information on electronic mapping applications, visit the Maryland Department of Planning web site at <http://planning.maryland.gov/Pages/OurProducts/OurProducts.aspx> (<http://planning.maryland.gov/Pages/OurProducts/OurProducts.aspx>).

Attachment 1.A.a: Applicant submission materials (2793 : PLT2020-00584 - Recordation of Existing Lot)



Agenda Item #:	A
Meeting Date:	September 11, 2019
Responsible Staff:	Andrea Gilles

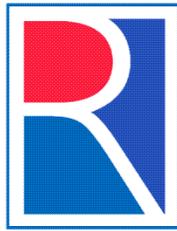
SUBJECT:

Work Session 5: Comprehensive Plan: Draft for Planning Commission Public Hearing

RECOMMENDATION

(Include change in law or Policy if appropriate in this section):

Hold a work session to discuss public testimony received on the Environment and Water Resources Elements of the Comprehensive Plan: Draft for Planning Commission Public Hearing.



City of
Rockville
 Get Into It

Planning Commission Staff Report

MEETING DATE: September 11, 2019

REPORT DATE: September 4, 2019

RESPONSIBLE STAFF: Andrea Gilles, AICP, Principal Planner
 Long Range Planning 240.314.8273
 agilles@rockvillemd.gov

SUBJECT: Work Session on the Environment and
 Water Resources Elements of the Draft
 Comprehensive Plan

BACKGROUND:

Actions to Date

The Comprehensive Plan: Draft for Planning Commission Public Hearing was released in March 2019. Following the public hearings, which were held in May and early June, the Planning Commission scheduled work sessions to review testimony with staff.

The Planning Commission closed the public record for written testimony on Tuesday, June 18, 2019. Written testimony received by the Planning Commission and transcripts from the public hearings are available on the project Web site at: www.rockvillemd.gov/203/Rockville-2040-Comprehensive-Plan-Update. All testimony and the transcripts were provided to the Planning Commission as part of the staff report for the June 26 work session on the Comprehensive Plan, beginning on P. 137 of the packet. Consistent with the request by the Planning Commission at the June 26 work session, only

the testimony related to the elements to be discussed at this work session are attached with this staff report.

The first work session, held on June 26, discussed the Plan Introduction and the Community Facilities, Economic Development, and Municipal Growth elements. The second work session, on July 10, covered the Housing, Historic Preservation, and Recreation & Parks elements. The third and fourth work sessions, on July 24 and August 7, focused on the Land Use element. During each meeting, the Planning Commission reviewed testimony submitted and instructed staff to make changes to the Draft Plan based on the discussion.

Summary of Draft Plan Contents

The Draft Plan constitutes the first major portion of the proposed update to the existing Comprehensive Master Plan, which was adopted by the Mayor and Council of Rockville on November 12, 2002 and amended through the adoption of subsequent functional and neighborhood plans (e.g., Twinbrook, East Rockville, Bikeways Master Plan, Municipal Growth Element, etc.).

This first portion of the Draft Plan contains an Introduction chapter and ten Elements, which are citywide topic areas. The second portion of the plan has not yet been completed or released. It will cover the planning areas, which are closer looks at geographic subareas of the city. The draft of the planning areas portion will be presented to the Planning Commission this fall, for its review, adjustments, and release for public testimony.

DISCUSSION:

This staff report presents testimony received (Attachment A) on the Environment Element and the Water Resources Element (WRE) of the Draft Plan, along with staff responses on each item (Attachment B), for the Planning Commission to consider. Please note that some of the testimony in Attachment A covers multiple topics, including the Environment and/or Water Resources, and therefore was provided for review in prior work sessions.

During the work session for this agenda item, staff will highlight key issues for discussion rather than presenting every issue for which testimony was received. Similarly, this staff report focuses on the testimony that staff believes warrants further discussion and decision by the Planning Commission. Testimony with minor edits, general remarks, or that which staff believes goes beyond the scope of the Comprehensive Plan is left to the attached summary matrix (Attachment B) for reference. However, Commissioners should feel free to bring up for discussion any testimony or topics related to the elements.

Staff requests direction from the Planning Commission on any revisions the Commission wishes to make to these elements, after reviewing the testimony.

KEY TESTIMONY ON THE ENVIRONMENT ELEMENT

To organize the testimony received on the draft Environment Element, staff has grouped the testimony by topic areas/element goals rather than by the individual or agency submitting the testimony.

Climate Change

State of Maryland (Exhibit 11)

Testimony: The Maryland Department of Planning states that the city could build upon its discussion of climate change adaptation by adding an action under Policy 5 "for the city to work with the county health department and the county office of emergency management to identify, develop and obtain funding for projects and programs that would reduce current and future climate change impacts to the city's vulnerable natural resources, infrastructure, buildings and populations." (Exhibit 11, pg. 8)

Staff Response: Pg. 130, Policy 5: Staff agrees and recommends adding Action 5.8, to say "work with the Montgomery County health department and office of emergency management to identify, develop and obtain funding for projects and programs that would reduce the impacts of current and future climate change to the city's vulnerable natural resources, infrastructure, buildings and populations."

Staff also recommends clarifying the text for the overall Policy. Staff suggests clarifying that Policy 5 is more focused on responding to the impacts of climate change, rather than attempting to reduce climate change, which is more the focus of Policies 2, 3, and 4. Staff suggests the following text refinement for Policy 5: "Assess Rockville's climate-related risks and identify actions to reduce vulnerability and enhance local adaptation and resiliency capacity."

Rockville Environment Commission (REC), (Exhibit 31)

Testimony: Comment #29. Policy 3, pg. 128. Include the idea of promoting awareness of energy conservation along with energy efficiency and use of renewable energy among the city's population.

Staff Response: Staff agrees and suggests that language be added to Action 3.3 (pg. 128) to read: "Work with and educate property owners, tenants and contractors to make buildings more energy efficient in regard to heating, cooling, lighting, refrigeration, computing, and other equipment systems." (added language underlined)

Testimony: Comment #51. Policy 3, Action 3.1, pg. 128. Add second sentence to Action 3.1: "All construction at city facilities will meet LEED, Energy Star, or similar certification standards for energy efficiency and sustainability."

Staff Response: City buildings are currently subject to the Green Building Code. The proposed action would require Mayor and Council direction to ensure program resources and capital funding. Similar language to what is recommended could be

added to Action 3.1, pg. 128, such as: Work toward meeting LEED, Energy Star, or similar certification standards for energy efficiency and sustainability for city buildings.

Rockville (Twinbrook) Resident, (Exhibit 36)

Testimony: Pages 139-143 include statistics on the tree canopy in Rockville. Given the goals to preserve and enhance vegetation in the city and the fact that Rockville is a "Tree City USA", the plan should include not only estimates of Rockville's carbon emissions, but also estimates of how much carbon is sequestered in Rockville's city trees and natural areas, and in residential areas.

Staff Response: Staff believes that the estimates of carbon sequestration are beyond the scope of the Comprehensive Plan; however, compilation of such data may be incorporated into a future staff work program. The Environment Trends report (the existing conditions report that was prepared prior to the Draft Plan, and can be accessed at: www.rockvillemd.gov/2174/Topical-Trends-Reports) includes a section on Forests and Tree Canopy and a summary of programs and initiatives, statistics, and maps. Furthermore, although there are many environmental and social benefits to urban greenery, studies and methodology are still evolving to estimate carbon sequestration capacity and effectiveness. More research is needed on the cumulative effects of trees, soils and their management in urban areas when compared to the magnitude of emissions generated by urban transportation and buildings.

Sustainable Design with Green and Healthy Buildings

Rockville Environment Commission (REC), (Exhibit 31)

Testimony: Comments #36 and #37 from the REC both recommend changes to action items for Policy 6 on page 133. The first recommends editing Action 6.4 to include language about bringing "energy performance of existing buildings to perform in top 25% nationwide, either through ENERGY STAR certification or an Energy Use Intensity (EUI) better than the national median (CBECS)." The second comment recommends a new action item that would read: "All new residential construction will be zero net energy (ZNE) by 2025. All new commercial construction will be ZNE by 2030. 50% of commercial buildings will be retrofit to ZNE by 2030. 50% of new major renovations of city buildings will be ZNE by 2025."

Staff Response: In general, these topics are addressed in Action items 3.3, 6.1, 6.2 and 6.3. The level of detail suggested by the testimony is beyond the scope of the Comprehensive Plan; however, staff may work with Mayor and Council as part of a future work program initiative to establish benchmarks toward meeting these, or similar goals. A move toward requiring these specific measures would necessitate direction and financial resources from the Mayor and Council to meet such mandates, and there are cost and programmatic implications associated with their requirements.

Urban Forests and Wildlife Habitat

Rockville Environment Commission (REC), (Exhibit 31)

Testimony: Comment #44 recommends adding a new action to Policy 9 on page 139 to read: "Increase forest easement acquisition efforts."

Staff Response: Action items 12.1 and 12.2 address this issue on page 143. Staff suggests that action item 12.1 be moved under Policy 9, rather than Policy 12.

REC (Exhibit 31) and Rockville (Twinbrook) Resident, (Exhibit 36)

Testimony: There were several comments about Policy 11 and Action 11.1 on pages 141 and 143. The REC (Exhibit 31) recommended calling out the use of green building features in 11.1 as well as including a cross-reference to other parts of the chapter that address green building (Goal 3). As part of Exhibit 36, it is suggested that "to better 'balance between environmental goods' [as stated currently in the plan, pg. 141, last sentence] in intense urban growth areas, the plan could include a goal to explore opportunities to create green spaces by requiring combinations of solar panels and types of vegetation compatible with dense development, such as green rooftops, terraces with planters, and green walls within and outside of the buildings."

Staff Response: Staff recommends including examples of green building features to Action 11.1 (pg. 143) by adding the underlined text: "Revise the Forest and Tree Preservation Ordinance to consider context, to find a balance between the number of required trees and city objectives for stormwater management, solar or renewable energy, improved air quality through the reduction of vehicle miles traveled, green building features such as green rooftops, green walls, solar panels, and other important environmental goals." In addition, a cross-reference to Goal 3 (pg. 133), "Sustainable Design with Green and Healthy Buildings" could be added to this Policy.

KEY TESTIMONY ON THE WATER RESOURCES ELEMENT (WRE)

As with the testimony for the Environment Element, this section includes only the issues from the testimony that staff believes need further discussion with the Planning Commission. The Planning Commission may also choose any item of testimony included in the matrix (Attachment B), but not highlighted in this staff report, to discuss further. For all testimony received on the WRE, please see Attachments A and B.

Growth TiersState of Maryland (Exhibit 11)

Testimony: The state provided several comments suggesting improvements to the Sewer Growth Tier map (Figure 25 on pg. 159) to ensure that the city's growth tiers are consistent with Montgomery County and that the city's intentions for extending sewer service to unserved areas are clear. The city's proposed map would be an amendment from the previous Sewer Growth Tiers map adopted in the 2010 WRE, reflecting the city's proposed expanded Maximum Expansion Limit (MEL) (pg. 224). The State provided several suggestions for refinements (testimony Exhibit 11, pg. 9 of 12) to the Growth

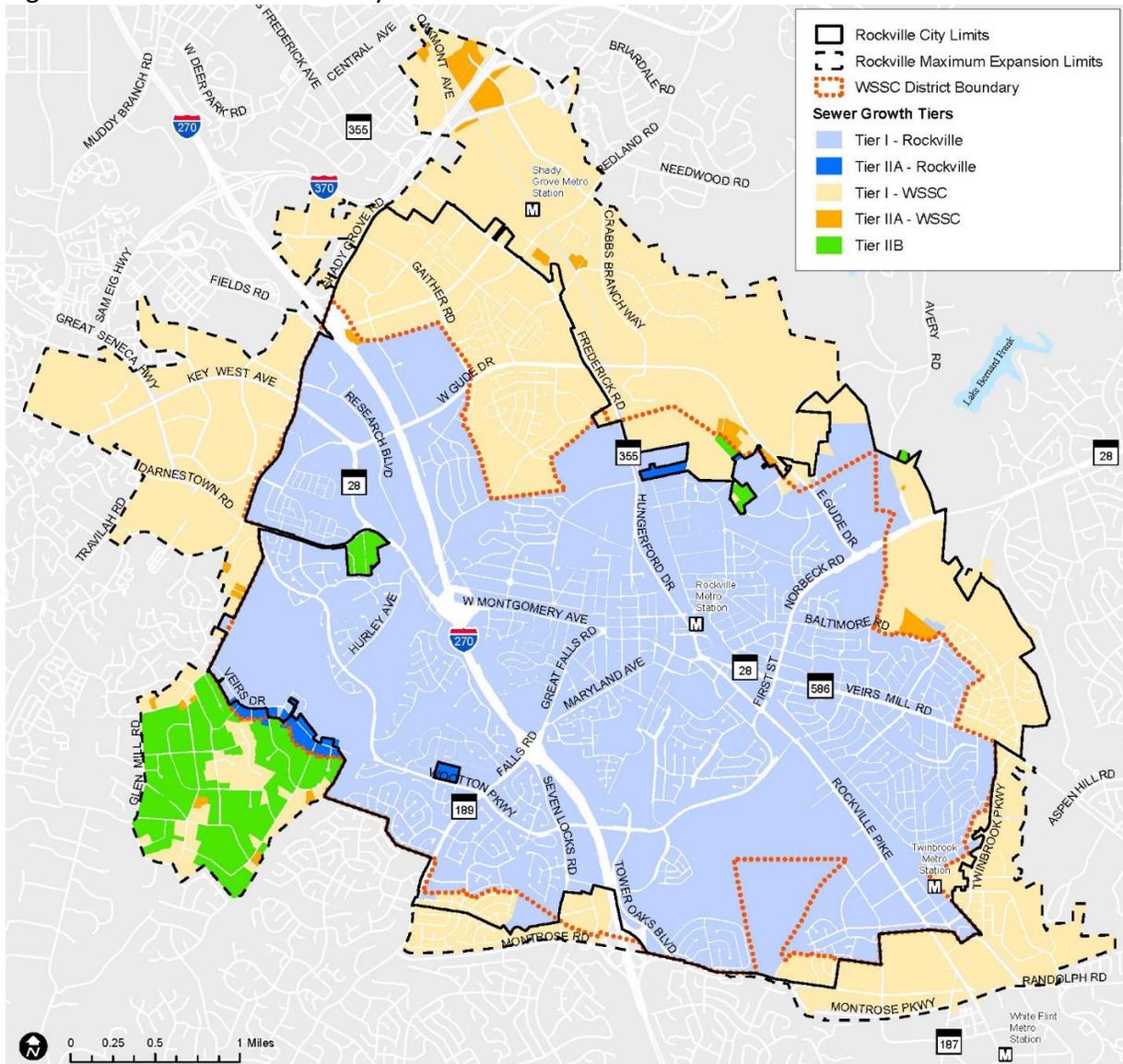
Tiers text and map as well as a request to submit the city's final Sewer Growth Tier map for State review in accordance with state law.

Staff Response: Establishing areas planned for public sewer service that currently are unserved is a significant policy decision as it involves costly infrastructure investments and has implications for the operation and maintenance of the existing Rockville sewer system, as well as for impacts on environmental and public health. Staff from the Department of Public Works and the Department of Planning and Development Services met internally, as well as with representatives from Montgomery County, to work through each of the State's comments. Staff recommends the following for the Planning Commission's consideration:

- Within the Water Resources Element, reiterate language from the Municipal Growth Element (MGE), stating a priority for annexation of properties that are likely to be fiscally beneficial to the city and where adequate public facilities (e.g., sewer service) can be provided. This language could be duplicated text or a shorter cross-reference to the MGE.
- Reiterate language from the MGE (pg. 231, Policy 8, 1st paragraph) explaining the circumstances and conditions that the city would consider extending new public sewer services, whether or not a property has been annexed into the city or is within the Rockville or Washington Suburban Sanitary Commission (WSSC) service area.
- Include definitions and expectations in the Draft Plan for each of the Sewer Growth Tiers (i.e., Tier I, Tier IIA, Tier IIB) as follows:
 - **Tier I - Rockville:** Currently served by sewer that is owned and maintained by the City of Rockville.
 - **Tier I - WSSC:** Currently served by sewer that is owned and maintained by WSSC.
 - **Tier IIA - Rockville:** Municipal Growth Area; not yet in the City sewerage plan. The area is within Rockville's MEL and adjacent to Rockville's sewer service area. The City of Rockville plans to provide sewer service to these properties if the property is annexed into the City limits. The property owner generally assumes all costs to extend the public system(s) to provide service to the lot, including design, easements and construction.
 - **Tier IIA - WSSC:** Municipal Growth Area; not yet in the County sewer plan. The area is within Rockville's MEL and within WSSC's sewer service area. Montgomery County's sewer service category for these properties is S-1.
 - **Tier IIB:** Property not currently served by a public sewer system that the city may consider for service on a case-by-case basis. Property may be served by the City of Rockville or WSSC. The property owner generally assumes all costs to extend the public system(s) to provide service to the lot, including design, easements and construction.

- Revise the Sewer Growth Tier map (Figure 25 on pg. 159) to show which areas within the city’s MEL are planned for new city sewer service, should properties within those areas annex into the city, versus those areas in the MEL for which there is no current plan to provide service, but for which the city would consider extending new sewer service under certain circumstances. The proposed map (Figure 1 of this report) would replace the draft Water Resources Element’s Figure 25. (The map is also included as Attachment C.)

Figure 1: Sewer Growth Tiers by Service Area



Land Use - Impervious Surface Analysis
State of Maryland (Exhibit 11)

Testimony: The State noted that the WRE does not directly address the statutory requirement to, “identify suitable receiving waters and land areas to meet the storm

water management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan.” (§3-106. (a)(2) of the Land Use Article). They say that the WRE should discuss this issue. State guidance to address this requirement is for jurisdictions to complete an analysis of more than one land use plan option, focused on forecasted impervious cover changes and forest cover changes by watershed resulting from implementation of different land use plan options. Based on that analysis, the state says, the WRE could discuss which land use plan option would be least impactful to receiving waters.

Staff Response: Staff believes that the State requirement has been fulfilled. As stated in the Land Use and Urban Design Element of the Plan, the city is largely built out, with few remaining large tracts of developable land other than three golf courses. Redevelopment in Rockville is already subject to forest conservation, stormwater management, and sewer regulations that serve to protect water quality and preserve impervious surfaces. Therefore, any redevelopment activity would include more protective stormwater management facilities than was required for development that took place in the past. It may also require maintenance or capacity increases to the sewer system and, in rare instances, require removal of septic tanks. All of these changes will result in positive impacts to receiving waters.

The Comprehensive Plan does not identify the three golf courses as areas for potential future growth, except for a portion of Woodmont Country Club that was previously approved in the Rockville Pike Neighborhood Plan, and does not provide a detailed plan for this growth. Any changes to the current land use of these golf courses would require a future concept plan that would result in an amendment to the Comprehensive Plan; and any potential impacts to receiving waters due to the specific land use plans explored would be investigated through the plan amendment process.

Stormwater Treatment

Rockville Environment Commission (REC), (Exhibit 31)

Testimony: The REC pointed out that the action items under Policy 13 (p. 169) only reference pesticides, herbicides, etc. in backyards and green-covered spaces, not paved surfaces. They request a new Action 13.4 to: “Increase public awareness of and alternatives for harmful snow-melt compounds on residential and commercial property paved surfaces.” With dramatically changing temperature and precipitation patterns over winters in the Mid-Atlantic area it would be productive to engage/remind the public to use less harmful and more Baysafe products.

Staff Response: Action 12.3 on pg. 167 includes a broader list of pollutants, including road salts, that warrant identification and mitigation to improve water quality. To more directly address the testimony, staff suggests that ‘road salts’ be modified to read, “road salts and snow-melt compounds,” and make clear that this action addresses both landscaped and paved surfaces.

Additionally, instead of adding a new action 13.4, Action 13.2 could be reworded and replaced with the following text: “Increase public awareness to improve water quality by reducing fertilizers, herbicides, pesticides, and snow melt compounds and using Bay-friendly alternatives.”

Water Supply

In addition to public testimony, staff from Public Works recommends that current Policy 7 on page 156, “Seek approval from Maryland Department of Environment to allow periodic discharges from the water treatment plant to the Potomac River,” be moved under Policy 5 on pages 154-155 as a new action item. The relevant text under existing Policy 7 would also be incorporated into the introductory text under Policy 5.

Typographical Edits and Clarifications

A few exhibits point out typographical, numerical, or word choice errors. Staff will correct these as noted and will make any minor text edits or clarifications found while incorporating revisions to the draft plan as directed by the Planning Commission.

PUBLIC OUTREACH:

After the Draft Plan was released on March 14, 2019, staff initiated a public information program to educate the Rockville community about the Draft Plan contents and seek public input. The Comprehensive Plan: Draft for Planning Commission Public Hearings was posted on the city’s Web site, at the following: www.rockvillemd.gov/203/Rockville-2040-Comprehensive-Plan-Update. It was sent to the State Clearinghouse within the Maryland Department of Planning, relevant public agencies, and adjoining jurisdictions. Additionally, staff held two informational meetings, prior to the Planning Commission’s public hearings, to assist the public in understanding both the Draft Plan and the methods by which written and oral testimony could be provided.

Staff also offered to visit with any community, business, and other organizations, including City Boards and Commissions, that wished to receive a presentation on the Draft Plan and how to provide testimony. Overall, staff visited with many and has made many informational presentations on the Draft Plan since its release for public comment.

In addition, staff worked with the city’s Public Information and Community Engagement office to provide information through Rockville Reports, Rockville 11, social media, and listserv emails to provide information on the Draft Plan content, public hearing dates, methods to provide testimony, and to keep the public updated on the process.

At a broader level, the Draft Plan is the result of extensive community input that was gathered over a multi-year period, and continues to the present, in a process known as “Rockville 2040.” That process is summarized in the Introduction chapter of the Draft Plan, meeting dates, results, and materials can be found on the Rockville 2040: Meeting Results and Materials webpage at: <https://www.rockvillemd.gov/1757/Community-Meeting-Results>.

BOARDS AND COMMISSIONS:

City boards and commissions participated in many of the public meetings held during the Rockville 2040 process; and city staff have attended various meetings of boards, commissions and other organizations (e.g. Rockville Environment Commission, Rockville Economic Development, Inc., Rockville Housing Enterprises, etc.) to obtain their input. The Planning Commission may choose to include boards and commissions in work sessions, on various topic areas.

NEXT STEPS:

The next work session on the Draft Comprehensive Plan is scheduled for September 25, 2019 to discuss testimony on the Transportation Element and a final review of the Plan's Vision and Principles on pages 1 and 2 of the Introduction.

Attachments

- Attachment 2.A.a: Testimony Full - Water & Environment (PDF)
- Attachment 2.A.b: Testimony Summary Matrix - Water & Environment(PDF)
- Attachment 2.A.c: Proposed Amended Sewer Growth Tiers Map (PDF)

Ricky Barker

Ricky Barker, Director of Planning and Development Services

9/4/2019



MARYLAND DEPARTMENT OF



PLANNING

Larry Hogan, Governor
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary
Sandy Schrader, Deputy Secretary

May 14, 2019

Ms. Gail Sherman, Chair
City of Rockville Planning Commission
c/o Long Range Planning, CPDS
111 Maryland Avenue
Rockville, MD 20850

Dear Ms. Sherman,

Thank you for forwarding the draft 2040 City of Rockville Comprehensive Master Plan Update. We appreciate your participation in the plan review process.

The Maryland Department of Planning (Planning) feels that good planning is important for efficient and responsible development that adequately addresses resource protection, adequate public facilities, community character, and economic development. Keep in mind that Planning's attached review comments reflect the agency's thoughts on ways to strengthen the City's plan update as well as satisfy the requirements of the State Land Use Article.

The Department forwarded a copy of the 2040 City of Rockville Comprehensive Master Plan Update to State agencies for review including, the Maryland Historic Trust and the Departments of Transportation, Environment, Natural Resources, Commerce, Housing and Community Development, and Agriculture. To date, we have received comments from the Maryland Historic Trust and the Departments of Housing and Community Development, Commerce, and Environment; these comments have been included with this letter. Any plan review comments received after the date of this letter will be forwarded upon receipt.

Planning respectfully requests that this letter and accompanying review comments be made part of the City's public hearing record. Furthermore, Planning also asks that the City consider our comments as revisions are made to the draft Plan amendment, and to any future plans, ordinances, and policy documents that are developed.

Please feel free to contact me at (410) 767-1401 or Joseph Griffiths, Local Assistance & Training Manager, at (410) 767-4553.

Sincerely,

Charles Boyd, AICP
Director, Planning Coordination

Cc: Ricky Barber, Director of Community Planning and Development Services, City of Rockville
David Levy, Chief of Long Range Planning, City of Rockville
Pat Keller, Assistant Secretary for Planning Services
Joseph Griffiths, Local Assistance and Training Manager



Maryland Department of Planning Review Comments
May 14, 2019
2040 City of Rockville Comprehensive Master Plan Update

The Maryland Department of Planning (Planning) has reviewed the draft 2040 City of Rockville Comprehensive Master Plan Update (Update) and offers the following comments for your consideration. These comments are offered as suggestions to improve the draft Update and better address the statutory requirements of the Land Use Article. Other state agencies, as noted, have contributed comments. Still others may have comments submitted under separate cover. If comments from other agencies are subsequently received by Planning, they will be forwarded to the city in a timely manner.

Summary of Draft Comprehensive Master Plan Update:

This is a complete update to the 2002 City of Rockville Comprehensive Master Plan. This draft Update addresses the major planning issues facing the existing corporate boundaries of the city and details out the growth challenges and opportunities for the city's identified maximum extension limit (MEL) areas.

The organizational structure of the Update is similar to the 2002 Master Plan, with the exception of a few chapters, such as the issues raised in the "Urban Growth," "Community Appearance and Design," and "Residential Neighborhood Planning Areas," have been moved into the "Municipal Growth" and the "Land Use and Urban Design" chapters. It should be noted the draft Update does not appear to provide for a logical placement or discussion of neighborhood planning areas or the adopted neighborhood plans, which were a large part of chapters 11 and 12 of the 2002 Master Plan.

Even though the City of Rockville has not completed a full update of its comprehensive plan in 17 years, the city has routinely evaluated and updated its master plan over the years. The most recent plan amendment, the North Stonestreet Avenue Neighborhood, was completed in 2018. Before that, the city adopted the 2017 Bikeway Master Plan and the 2016 Rockville Pike Neighborhood Plan, all of which have been incorporated in some fashion into this draft Update. The draft 2040 Plan also incorporates updates of the adopted 2010 Municipal Growth Element and the 2010 Water Resources Element, which were mandated by the Maryland General Assembly in 2006 under HB 1141. The Updated Master Plan additionally includes an updated Growth Tier Map, which was required under the Sustainable Growth & Agricultural Preservation Act of 2012.

Minimum State Law Requirements for Non-Charter Counties/Municipalities]

Maryland's Land Use Article sets forth the required components of a local comprehensive plan but does not mandate a specific format. As such, local governments have addressed these required elements in a manner that fits the needs of their community and the resources available to respond to the issues explored during the planning process. The following checklist (Table 1) summarizes an assessment as to whether each required local plan element is addressed in the draft 2040 City of Rockville Comprehensive Master Plan Update.

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

TABLE 1

Checklist of Maryland Code (Land Use Article) requirements for local comprehensive plans in Maryland			
State Comprehensive Plan Requirements	MD Code Reference	Additional MD Code Reference	Draft 2040 City of Rockville Comprehensive Master Plan Update Plan Page references
(1) A comprehensive plan for a non-charter county or municipality MUST include:	<u>L.U. § 3-102(a)</u>		
(a) a community facilities element	<u>L.U. § 3-102(a)(1)(i)</u>	<u>L.U. § 3-108 -- Community facilities element.</u>	Pgs. 111-121
(b) an area of critical State concern element	<u>L.U. § 3-102(a)(1)(ii)</u>	<u>L.U. § 3-109 -- Areas of critical State concern element</u>	N/A
(c) a goals and objectives element	<u>L.U. § 3-102(a)(1)(iii)</u>	<u>L.U. § 3-110 -- Goals and objectives element</u>	Throughout the Plan, starting on Page 18.
(d) a land use element	<u>L.U. § 3-102(a)(1)(iv)</u>	<u>L.U. § 3-111 -- Land use element</u>	Pgs. 15-53
(e) a development regulations element	<u>L.U. § 3-102(a)(1)(v)</u>	<u>L.U. § 3-103 -- Development regulations element</u>	Throughout the Plan, starting on Page 22
(f) a sensitive areas element	<u>L.U. § 3-102(a)(1)(vi)</u>	<u>L.U. § 3-104 -- Sensitive areas element</u>	Pgs. 123-143
(g) a transportation element	<u>L.U. § 3-102(a)(1)(vii)</u>	<u>L.U. § 3-105 -- Transportation element</u>	Pgs. 55-87
(h) a water resources element	<u>L.U. § 3-102(a)(1)(viii)</u>	<u>L.U. § 3-106 -- Water resources element</u>	Pgs. 145-171
(i) a mineral resources element, IF current geological information is available	<u>L.U. § 3-102(a)(2)</u>	<u>L.U. § 3-107 -- Mineral resources element</u>	N/A
(j) for municipalities only, a municipal growth element	<u>L.U. § 3-102(a)(3)</u>	<u>L.U. § 3-112 -- Municipal growth element</u>	Pgs. 221-235
(k) for counties only if located on tidal waters, a fisheries element	<u>L.U. § 3-102(a)(4)</u>	<u>L.U. § 3-113 -- Fisheries element</u>	N/A
Optional: (2) A comprehensive plan for a non-charter county or municipality MAY include: (a) a community renewal element; (b) a conservation element; (c) a flood control element (d) a housing element; (e) a natural resources element; (f) a pollution control element; (g) information concerning the general location and extent of public utilities; and (h) a priority preservation area (PPA) element	<u>L.U. § 3-102(b)</u>	<u>L.U. § 3-102(b)(2)(i)</u>	Recreation & Parks - Pgs. 89-109; Econ. Dev - Pgs. 173-203 Housing - Pgs. 187-203 Historic Preservation- Pgs. 205-219
(3) Visions -- A local jurisdiction SHALL through the comprehensive plan implement the 12 planning visions established in L.U. § 1-201	<u>L.U. § 3-201(c)</u>	<u>L.U. § 1-201 -- The 12 Planning Visions</u>	Pg. 7, plus vision statement at the beginning of each chapter
Optional: (4) Growth Tiers -- If the local jurisdictions has adopted growth tiers in accordance with L.U. § 1-502, the growth tiers must be incorporated into the jurisdiction's comprehensive plan	<u>L.U. § 1-509</u>		Pg. 159

As shown in the above checklist, the draft 2040 City of Rockville Comprehensive Master Plan Update includes the required elements as identified in §3-102 of the Land Use Article of the Maryland Annotated Code. The Mineral Resources and Fisheries Elements are not applicable to Rockville's land uses and community needs. It should be acknowledged the "area of critical State concern element" is a statutory comprehensive plan requirement that is being addressed as part of the Planning's revision of the State Development Plan: *A Better Maryland*. Currently, Planning does not have specific guidance to local jurisdictions on what should be considered "areas of critical state concern." However, with *A Better Maryland*, Planning will develop guidance on how state agencies can assist local governments on those

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

areas of critical state concern applicable to or of interest in their community. If you have not reviewed the draft *A Better Maryland* document, please visit the [A Better Maryland website](#) and review the document. We are accepting comments on the draft State Development Plan until May 17.

General Comments

The following is a series of general plan comments the City of Rockville Planning Commission may want to consider addressing:

- The draft 2040 City of Rockville Comprehensive Master Plan Update is well organized using a traditional element/topical approach. This makes it easy for the reader to focus attention on specific policies and action statements that are intended to address the desired vision. From this perspective, the draft Update also enables city planning staff, planning commissioners and elected official to logically work through a list of actionable items related to the topic.

However, using this approach, there is no sense of priority about which action items need to be addressed first, or if there is a relationship between actions in one chapter with those in another. Consider adding an implementation chapter that provides direction on which actions should occur first. The city may want to include a time estimate of when the action would be started, which could help frame public expectations.

- Vision statements for each chapter present an informative perspective of the city's future. It would be interesting to see all of these together as part of an Executive Summary of the comprehensive plan.
- The City of Rockville has a long history of conducting neighborhood plans to supplement the city's comprehensive master plan. The Introductory Chapter provides a declarative statement on page 2 on the status of the draft Update relative to other neighborhood plans,

“This document is the Comprehensive Plan for the City of Rockville. It supersedes the last overall plan, which was the 2002 Comprehensive Master Plan. It incorporates some previously approved neighborhood plans and supersedes others, as detailed in the Planning Areas section of the plan.”

But, it is unclear which portions of the approved neighborhood plans are incorporated and what parts are superseded. With the adoption of the Update, will all adopted neighborhood plans be repealed and no longer be used as reference in decision-making, or will parts of the neighborhood plans serve as a policy guide?

Additionally, it is unclear where the “Planning Areas” section of the draft Update is located as referenced on page 2. There appears to be no titled “Planning Areas” section in the draft plan. It should be noted that the third paragraph on page 3 (immediately above the Purpose Section) and the adjacent text box provide some of the needed organizational structure of the plan, defining the relationship of the neighborhood plans with the Comprehensive Master Plan. Furthermore, the draft Update has three references to a "Planning Areas" section of the document, but it is unclear where that section is. It is assumed the Planning Area section starts on page 21, but it is not apparent.

The structure of the plan and its relationship to the neighborhood plans and the planning areas could benefit from a section that provides more details on the relationship of the neighborhood

Draft 2040 City of Rockville Comprehensive Plan Update Maryland Department of Planning Comments

plans to the Master Plan, and describes how subsequent neighborhood plan updates would be incorporated into the master plan. Will the neighborhood plans be considered separate studies and not be incorporated into the adopted Master Plan? For example, on page 95 in the Recreation and Parks Chapter, there is a reference to the "Rockville Pike Neighborhood Plan" as part of the comprehensive plan. However, the relationship of the Master Plan with the associated neighborhood plan is not as clear as it could be, and it is recommended more details on relationship between the neighborhood plans and master plan be added to the draft Update.

- The "Summary of Community Input" included in each of the chapters sends a strong message to the citizens of Rockville that their public participation in the planning process is heard and makes a difference.

Detailed Element Review Comments

The following is a series of detailed comments on each chapter of the draft 2040 City of Rockville Comprehensive Master Plan Update that the City of Rockville Planning Commission may want to consider addressing:

Introduction Chapter

- Second paragraph under the Purpose Section (page 3), it is recommended the statutory reference should be changed to "Title 1 of the Land Use Article, Code of Maryland," in the sentence "The power to regulate land use is granted by the state in exchange for compliance with Chapter 426 of the Code of Maryland (known as the "Land Use Article"), which governs land use matters in municipalities."
- See page 10, table *City of Rockville Population, Household, and Employment Growth Projections*. Please verify the population projection for 2020. The figure does not seem to match what is reported in MWCOG Round 9.1: 72,200. The draft Update shows a projection of 72,300.
- See page 12, first paragraph, under sub-section *Income, Education, and Poverty*. Please verify the median household income values shown for the U.S. and Maryland. The 2013-2017 ACS 5-year estimate for the U.S. (Table B19013) is \$57,652 not the \$60,336 as shown in the draft Update. For Maryland, according to ACS, it is \$78,916 not the \$80,776 shown in draft Update.
- See page 13. Please correct the source shown for the two Tables. There seems to be a typographical error: instead of 2013-2017 ACS 5-year estimate, 2011-2015 is shown.
- Planning's demographic analysis staff note a curiosity of why more recent data, from 2011 to 2017, were not included in the demographics section especially when describing population, race/ethnicity, and age characteristics. If you are interested in receiving technical assistance in this area, please contact your Regional Planning to coordinate assistance.

Land Use Chapter

- Page 18: Please note that Figure 3 – Land Use Policy Map is on page 20 and not on page 14 as the draft Update noted.
- Page 19: The city may want to add "condominium" along with "apartment" buildings to describe multiple dwelling unit in RM, RF, RRM, ORRM, and RO. Only including "apartment buildings" may mislead readers to think only rental multiple unit buildings are allowed.

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

- The City of Rockville’s policy on page 22 – “Policy 2: Maintain large areas of Residential Detached land use, while allowing one additional accessory apartment or accessory dwelling unit per lot” is a truly noteworthy policy and the city is to be commended on its efforts to provide for more affordable housing options within existing established residential communities by recommending the inclusion of accessory dwelling units on a single-family detached lot.
- Upon completion of Actions 3.1 and 3.2 on page 24, Planning would welcome the opportunity to share the best practices learned by the city with other communities in Maryland. As part of Action 3.2 regulatory revisions, the city may want to consider evaluating the city’s development review and approval process, as this is often the largest impediment in getting affordable housing projects built. The city may want to consider by right or administrative approval based on compliance with development standards to avoid the neighborhood opposition to infill, higher density development.
- Page 24: the draft Update in the last paragraph states, “Mapping of the higher density zone would be limited to areas designated for Residential Multiple Unit (RM) use on the Land Use Policy Map.” Based on the draft plan, other land use categories, such as RF, RRM, ORRM, and RO, also allow residential multiple units. It is not clear if the city would consider including RF, RRM, ORRM, and RO zoned areas in the new high-density residential zone mapping effort. The city may want to clarify this issue.
- The city is commended for recognizing the ongoing challenge of regulating short-term rentals, like AirBNB (Page 27). Planning would welcome the opportunity to work with the city and other communities in Maryland to study various approaches to regulating short-term rentals.
- Planning supports the city’s commitment to promoting transit-oriented development (TOD) in Rockville Town Center to maximize ridership and investment in the Rockville station – Policy #8 on page 30. Planning has developed TOD planning tools, such as our [Transit Station Area Profile Tool](#), that the city may want to investigate in helping promote economic development around the Rockville Station.
- The city is to be commended for its efforts to combat the historic separation of residential and nonresidential use, by promoting walkable community nodes where retail uses support the adjacent residential areas (page 39).
- “Policy 24- Establish a floating zone specifically written to correspond with areas planned for Residential Attached on the Land Use Policy Map” on page 51 is another great example of trying to incrementally increase infill development in the city. The city is to be commended for this strategic effort to promote infill develop, yet retain the character of city’s neighborhoods.
- Planning’s Geospatial Data and Analysis Unit (GDA) noted the “Land Use and Urban Design” chapter establishes a strategy to accommodate shifting demographics and economic trends as discussed on pages 9-13. Goals and needs discussed in the Land Use chapter are supported by the Land Use Policy map and a comprehensive set of recommendations, including zoning code updates and flexible development regulations.
- Planning’s GDA thanks Rockville’s recognition of integrated land use and transportation planning which empathizes Transit Oriented Development and encourages walking, biking and transit.

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

- Planning's GDA appreciates Rockville's use of similar colors to show similar land uses on the Existing Land Use Map and the Land Use Policy Map (Figures 2 and 3), which facilitates comparison. However, the text reference to the Land Use Policy Map (page 18) should be page 20, not page 14.

Transportation Chapter

- Planning is pleased to see the city include visions, policies, and implementation actions in the draft Update to address multimodal transportation and proactively promote transit, walking, biking and other alternative transportation. These policies and actions may serve as best planning practices for other jurisdictions in Maryland. Planning wants to remain engaged with the city's Planning Department to monitor the success of the city's implementation efforts in hopes of sharing your lessons learned with others.
- Planning is also pleased that the city actively integrates transportation and land use planning to improve community walkability at strategic locations and support compact and mixed-use development, including transit supportive development in the Rockville and Twinbrook Metro Station areas and along the planned MD 355 and MD 586 Bus Rapid Transit corridors. Improving community walkability and transit-friendly land use make alternative transportation (e.g., transit) viable and investment more cost-effective.
- As a pioneer jurisdiction considering transit, bicycle and other alternative transportation in the adequate public facilities ordinance (APFO) review process, the city proposes to enhance the transportation APFO or the comprehensive transportation review regulation and procedure (page 66) to further address multimodal transportation needs for development projects in designated growth areas, particularly in TOD and other mixed-use compact development areas. Planning appreciates this city effort and believes it would provide a best practice for other jurisdictions considering reforming their APFOs to address multimodal transportation and encourage smart growth.
- Page 61_Policy 3: Currently, the Maryland State Highway Administration (SHA) is conducting the I-495 & I-270 Managed Lanes Study, which would incorporate transit and transportation demand management (TDM) components to address the multimodal aspect of the project. Planning encourages the city to work with SHA to explore transit and TDM strategies that the SHA's project can address to help achieve the city's transportation goals.
- Planning recommends the city reconsider the value of strategically studying neighborhood connections to improve accessibility by its residents, even though it may facilitate some cut through traffic (pages 61-63). Most of that cut through traffic will be from surrounding neighborhood residents, and this approach reduces the congestion on major roads and indirectly helps to make roads friendlier to pedestrians and bicyclists.
- Page 64-65: Planning staff suggests the draft Update include language regarding pedestrian and bicycle access consideration in Policy 7 and Policy 8 and the associated actions on page 65.
- Page 84-85_Policy 19: We are glad to note that the city addresses new and emerging transportation technologies and practices in the draft plan. Although there are many uncertainties regarding the effects of autonomous vehicles and how local governments can prepare for such new technologies, setting forth certain policy guidance may help the city to reduce potential adverse land use and environmental effects of autonomous vehicles. Perhaps, the city may want

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

to include an action to explore policy guidance on accommodating and encouraging shared and electric autonomous vehicles in coordination with the state.

- Page 86-87: As examples, Frederick City, the first jurisdiction in the State, developed and adopted “Plug-In Electric Vehicle (EV) Charging Infrastructure Implementation Plan” to help guide Frederick City’s efforts in accommodating electric vehicles. Similarly, Howard County passed CB76-2018 requiring EV charging infrastructure at certain new residential construction projects.
- Planning appreciates that the city calls for providing incentives and relaxing parking requirements to encourage affordable housing near transit. The two metro stations and two planned Bus Rapid Transit lines through the city provide the city with a substantial opportunity to address the growing need for affordable and mixed-income housing near transit for low- to moderate-income residents and seniors as the aging cohort becomes bigger in the city. Increasing land values and housing costs, on the other hand, make building affordable and mixed-income housing a challenge in the city, especially in areas near metro stations. Affordable/mixed-income housing near transit provides various social-economic, transportation, and environmental benefits, but it requires diverse strategies and involvement with multiple stakeholders. Planning encourages the city to develop a plan to provide a comprehensive approach to guide the affordable and mixed-income housing development effort. Some strategies that other jurisdictions have used include providing density bonuses, incentive tax policies, leveraging state and federal housing finance programs (such as Maryland’s Multifamily Bond Program), ensuring long-term affordable units, supporting land banking, and prioritizing affordable housing subsidy near transit.

Recreation and Parks Chapter

- Planning notes that the city has incorporated recreation and parks policies throughout the draft Update. For example,
 - Introduction
 - Two of the fourteen plan Principles listed in the Introduction pertain to parks, recreation, and resource conservation: “Provide accessible parks, open spaces and community centers” and “Enhance its natural environment and sensitive environmental areas.”
 - Land Use and Urban Design Element
 - Land Use Policy 25 (page 52) deals with three golf courses, the largest remaining open spaces in the city, with almost 800 acres in total. However, the policy emphasis tilts toward development of these sites rather than conservation/recreation.
- The goals and policies are good; in addition to more park land and good maintenance, they deal with accessibility, trail connections, resource conservation, innovative funding, programming to serve citizens with different requirements, etc. However, Planning suggests the Parks and Recreation Element could include a couple of sentences, in general terms, about the potential park and recreation values of the golf courses if they change use or ownership in the future.
- The vision is displayed prominently at the start of the chapter: *Vision: Rockville will continue to have a vibrant, beautiful, and easily-accessible park system with a wide variety of recreation facilities and programs, as this system is critical to supporting the health and well-being of the people of Rockville and its natural environment. Parks and recreation facilities will meet the needs and desires of Rockville’s diverse users* (page 89).
- It appears that Rockville’s park and recreation needs are NOT covered by the Maryland-National Capital Park and Planning Commission; Rockville publishes its own Parks, Recreation and Open

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

Space Plan (PROS). The current plan, adopted in September 2009, “is a long-range policy document that sets overall direction in terms of goals and objectives for parks and recreation in the City of Rockville for the next 20 years (2009 Rockville PROS plan, page ES-1). Does the city intend to keep the PROS plan in effect for another decade or begin a revision sooner? Perhaps the Parks and Recreation Element of the draft Update could include some details on the relationship of the 2009 Rockville PROS plan with the Master Plan.

Community Facilities Chapter

- No comments

Environment Chapter

- The City of Rockville draft comprehensive plan includes excellent information, policies and action items regarding climate change adaptation.
- Policy 5 within the city’s Environment Element, “Assess risks and vulnerabilities in Rockville of climate change and identify actions to mitigate localized impacts”, and the seven actions to implement this policy (pp. 130-131) should be very helpful for the city in preparing for climate change impacts.
- To build upon the city’s discussion of climate change adaptation, the city might want to add an action under Policy 5 for the city to work with the county health department and the county office of emergency management to identify, develop and obtain funding for projects and programs that would reduce current and future climate change impacts to the city’s vulnerable natural resources, infrastructure, buildings and populations. This could include identifying projects for inclusion in the next Montgomery County hazard mitigation plan update.
 - It should be noted the city does include actions within the city’s Water Resources Element (WRE) to prepare for climate change impacts to the city’s water supply (p. 151) and water treatment facility (p. 155), as well as a separate policy (and multiple actions) to prepare for climate change impacts to the city’s stormwater system (pp. 169-170).

Water Resources Chapter

- The city’s Water Resources Element (WRE) includes a water and sewer demand forecast for both residential and non-residential needs through 2040 (p. 147) and compares this to the availability of water supply, water treatment capacity, and sewer treatment capacity (in this case, the sewer capacity allocation provided by the Washington Suburban Sanitary Commission). However, as noted in comments below, closer coordination with the Montgomery County Water Supply and Sewerage Systems Plan appears warranted.
- Since the acronym “WSSD” is used several times, the first time it is used it should be referenced on page 147 - “WSSC’s service area, known as the Washington Suburban Sanitary District (WSSD), is set by the state.”
- The draft Update proposes an amended Growth Tier map (Figure 25) (page 150), which reflects the plan’s expanded municipal Maximum Expansion Limit (MEL). Once the comprehensive plan is adopted the City’s Planning Department should submit the adopted Growth Tier map to Planning so a formal review of the Growth Tier map under Section 1-505 of the Land Use Article.

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

- As provided for under Section 1-503 of the Land Use Article, Planning GDA staff has the following pre-adoption technical feedback and observations (please contact us if you need more details):
 - In the current Growth Tier Map adopted December 24, 2012, the Tier IIA definition includes only planned service areas that are not yet included in the city or county sewer plans. Based on Planning's GIS data, the proposed Tier IIA areas in Figure 25 also include areas planned for service in the county sewer plan. Planning generally recommends a Tier II designation for areas with county-planned sewer service and a Tier IIA designation for planned service areas that are not yet in the county water/sewer plan.
 - Page 159 identifies Tier IIA areas as properties within the MEL that would receive sewer service if annexed. However, some of the Tier IIA properties are already within city limits. Planning suggests that Rockville review these Tier IIA properties for potential inclusion in Tier II.
 - The MEL now contains Tier III within portions of the Glen Hills area, which is also designated as Tier III by Montgomery County. Planning generally recommends that Page 159 include a definition for Tier III as it does for Tiers I and IIA. According to page 231, portions of Glen Hills have potentially problematic septic systems and may be considered for future sewer service under certain conditions. Keep in mind that the state law (Section 1-506 of the Land Use Article) does not provide for Tier III designations in municipal tier maps. Planning generally recommends that municipal tier maps not include Tier III areas. The City may want to consider identifying this areas as Tier IIA, if it anticipates this area will be annexed and eventually be served by public sewer.
 - A portion of the proposed Tier IIA area along the southern edge of the existing municipal boundary near Scott Drive conflicts with areas designated as Tier III in Montgomery County's tier map. Planning generally recommends that the Town collaborate with the county to ensure that the county's adopted tier map reflects the Town's tier map designations. See Section 9-206(i) of the Environment Article for the method for resolving conflicting tier designations.
 - The MEL now contains additional overlap with Gaithersburg's MEL between Shady Grove Road and I-370. Rockville's proposed map appears consistent with Gaithersburg's map in this area. The towns are encouraged to continue collaborating on future Tier Map and MEL updates, perhaps as part of the proposed working arrangement with the City of Gaithersburg and Montgomery County regarding logical annexations (page 225).
- The table on page 152 has an error: the 2040 net increase for the City of Rockville portion of water should be 1.151 not 1.51, and the total should be 5.628 not 5.268. Also, the city might want to list the 2040 maximum daily demand forecast on this table given that page 155 discusses this forecast; currently the table only lists the 2040 average daily demand forecast.
- The WRE identifies a possible deficiency in its water treatment capacity compared to the 2040 maximum daily demand forecast (p. 156) and puts forward a plan for how to address that deficiency. The City is to be commended for addressing its long-term potable water challenge, unfortunately too few other jurisdictions are willing to do this until it becomes a crisis.
- The WRE does not directly address the statutory requirement to "identify suitable receiving waters and land areas to meet the storm water management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan" (§3-106. (a)(2) of the Land Use Article). The WRE should discuss this issue. State guidance to address this requirement is for jurisdictions to complete an analysis of more than one land use plan option, focused on forecasted impervious cover changes and forest cover changes by

Draft 2040 City of Rockville Comprehensive Plan Update Maryland Department of Planning Comments

watershed resulting from implementation of different land use plan options. Based on that analysis, the WRE could discuss which land use plan option would be least impactful to receiving waters.

- As noted in Maryland Department of the Environment’s attached comments:
 - Page 152: Table of Water Demand – The table’s 2040 Avg. Daily Demand of 7.49 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 3-T14), which has the 2040 Avg. Daily Demand of 6.55 MGD. The city should work with the county to reconcile any differences.
 - Page 158: Table of Wastewater Demand – The table’s 2040 Avg. Daily Flow of 8.54 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 4-T16), which has the 2040 Avg. Daily Demand of 7.42 MGD. The city should work with the county to reconcile any differences.

Economic Development Chapter

- No comments

Housing Chapter

- Planning requests a copy of the “Housing Market and Needs Assessment” report from December 2016, if it is available (page 189). Planning will be developing a Housing Element Models & Guideline document in the coming year to address recent legislation (HB 1045) passed in 2019, and this study may be helpful to other jurisdictions having to prepare a housing element.
- Planning’s GDA staff noted the Housing chapter includes an excellent discussion of market trends and trends in government programs that affect housing affordability. The text is supported by comprehensive recommendations, such as accommodating demand for certain housing types, allowing accessory dwellings, and strengthening municipal housing programs.
- The draft Update should include sources and text references for all Charts and Figures in the Housing Chapter (and elsewhere throughout the document). For example, pages 194-195 contain interesting information about the residential units built during different timeframes. However, it is unclear how this information was collected or how it relates to points made in the text. Nonetheless, Planning’s GDA staff appreciates Rockville’s support for seniors to continue to live within the community and projects that provide housing for people with disabilities.

Historic Preservation Chapter

- Please see comments on attached letter from Maryland Historic Trust

Municipal Growth Chapter

- The draft Update makes a strong case that expanding the municipal growth boundary provides the City with flexibility to annex land at little identifiable cost, since much of the proposed Municipal Expansion Limit (MEL) is already served by WSSC (page 225). Planning’s GDA acknowledges that Rockville incorporates somewhat of a phased approach to annexation by identifying and actively targeting areas where conditions may make annexation most likely and beneficial (pages 222-223).
- The draft Update analyzes the impact of projected population growth on City services (pages 147-171) and notes that Rockville’s projected growth can be accommodated within Rockville’s existing municipal boundaries (page 234). However, it does not include a development capacity analysis

Draft 2040 City of Rockville Comprehensive Plan Update
Maryland Department of Planning Comments

based on the build-out capacity of the future land use plan within the current municipal boundary or the MEL. A capacity analysis would facilitate a better understanding of the land available for new development, especially redevelopment and infill, as well as a general understanding of public services and infrastructure needed to accommodate future growth. Planning is willing to assist the city if it would like to complete and include a development capacity analysis.

- The draft Update identifies the challenge of creating enough parkland and other publicly accessible community spaces in redevelopment areas (pages 92-98). Rockville could note opportunities to provide open space or transition areas among the potential evaluation criteria for strategic annexations on page 223 (Municipal Growth Chapter).

Suggested Technical Edits/Suggestions

- If Planning can be of assistance or facilitate assistance / information from other State agencies as the City of Rockville finalizes the 2040 City of Rockville Comprehensive Master Plan Update or as the city begins to implement the plan, please contact Chuck Boyd, Director of Planning Coordination at 410-767-1401 or chuck.boyd@maryland.gov.

END MARYLAND DEPARTMENT OF PLANNING COMMENTS

Maryland Department of the Environment

Review Comments: Rockville 2040 Comprehensive Plan

Amanda R. Redmiles, MDE, Interdepartmental Information Liaison

Water Resources Element Comments:

1. Pg 152 Table of Water Demand
The Table's 2040 Avg Daily Demand of 7.49 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 3-T14), which has the 2040 Avg Daily Demand of 6.55 MGD; The City should work with the County to reconcile any differences.
2. Pg 158 Table of Wastewater Demand
The Table's 2040 Avg Daily Flow of 8.54 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 4-T16), which has the 2040 Avg Daily Demand of 7.42 MGD; The City should work with the County to reconcile any differences.

General Comments

1. Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land Management Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.

5. Any contract specifying “lead paint abatement” must comply with Code of Maryland Regulations (COMAR) 26.16.01 - Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with COMAR 26.16.02 - Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.
6. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.
7. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may requires site approval. Contact the Mining Program at (410) 537-3557 for further details.

Testimony on the Draft Rockville 2040 Master Plan for the Planning Commission Public Hearing

Kenneth Hoffman
1511 Auburn Ave, Rockville, MD 20850

Overall, the draft plan has had extensive and highly relevant input, with the draft capturing the vision, principles, and elements I would like to see enhanced in Rockville. Comments within this testimony attempts to address all ten elements under an overarching vision with goals that would build a more vibrant and self-sustaining community.

Essentially, Rockville should continue its tradition of being a thriving city where a resident can live, work, and enjoy life, from childhood through the senior years, in Rockville.

The greatest threat continues to be an increasing income disparity which decreases the percentage of the population that can comfortably live within the City gainfully employed in local jobs that would pay lower to upper middle-class incomes. For Montgomery County, a measure of income disparity, the Gini Coefficient, has steadily risen. In 1979, The Gini Coefficient was 0.3776; in 1989, 0.3985; in 1999, 0.4281; and in 2012-2016, 0.46. For comparison, within the 2012-2016 timeframe, the Gini coefficient for Canada is 0.34; for South Korea, 0.316; and the United States, 0.415.

Increasing differentials between employment income and housing costs result in increased one-directional commuting requirements where housing and work are increasing farther apart, with increasing traffic congestion and stressful commuting times. Residents have less opportunity to enjoy a quality of life that would be possible if housing and employment were within walking, bicycling, or very short driving distances.

An implicit goal for the Masterplan should be to build a stronger middle-class base of economically secure Rockville residents. The average life expectancy of most all business is far less than the average life expectancy of a human. With tax paying, voting, Rockville citizens, the business of our government should be to build an economically secure and healthy community that new and current businesses will find attractive.

Within the Masterplan, there are several references enhancing an integrative community engagement with Montgomery College. Montgomery College is uniquely placed to provide the education and skills needed for a diversified workforce serving the range of businesses needed to sustain health, build infrastructure, and offer all residents, workforce skill certifications, post-secondary academic degrees, and lifelong continuing education. The College is also one of the largest employers in the local area. A more integrative relationship with the College should be attractive to new and current local businesses, with knowledge that their potential workforce is economically secure and living in the local area.

The 2040 Rockville Masterplan must support the State of Maryland's 12 visions:

- 1) Quality of life and sustainability, 2) Public participation, 3) Growth areas, 4) Community design, 5) Infrastructure, 6) Transportation, 7) Housing, 8) Economic development, 9) Environmental protection, 10) Resource conservation, 11) Stewardship, and 12) Implementation

The 10 elements in the Rockville 2040 Masterplan are:

1) Land Use, 2) Transportation, 3) Recreation and Parks, 4) Community Facilities, 5) Environment, 6) Water Resources, 7) Economic Development, 8) Housing, 9) Historic Preservation, and 10) Municipal Growth

The specific suggestions described below is a modular concept, integrating the vision and elements, that result in a significant increase of a diversified middle-class population supporting Rockville principles.

The careful and detailed attention given to each of the 10 elements, defined through vision, goals and actions, of the Masterplan begin to come together into an overarching pilot concept that might lead to a world model for the integrated self-sustaining, community with a low disparity index, capable of improving infrastructure required for a health environment and prosperous and educated population. Within each of the 10 elements, vision, goals and related actions are exemplary.

- 1) Land use and Urban Design: Implicit in policies but not explicitly stated: Specific attention should be paid to the expected income potential of Montgomery College graduates from either degree or certificate programs; with initial incomes ranging from \$25K to \$75K/yr. Land use that allows this group to affordably live within city limits will require creative urban design for high density housing that allows this group to fully benefit from the 9 Rockville land use goals.
- 2) Transportation: Noted is that there have been problems related to maintaining a vibrant Town Center while also noting that there is little interaction between students and employees at Montgomery College, and businesses in Town Center. There exist several improvement opportunities for transportation improvements within the corridor between Rockville and Shady Grove metro, which includes Montgomery College.
 - a. A "Circulator" bus connecting Montgomery College campus and Town Center.
 - b. A metro station in the vicinity of North Campus Drive.
 - c. Enhanced bicycle paths and walkways between Shady Grove and Town Center, which improve access to and through Montgomery College and does not require travel on Route 355.
 - d. Planning for increased use of Class 1 pedelec e-bikes throughout the community (lower speed requiring pedaling that are classified as bicycles in Maryland).
- 3) Recreation and Parks: Critical for any high-density housing, a feeling of spaciousness even in low square footage homes is enhanced with surrounding parks having recreational activities. NOTE: with the recent fire at the Woodley Gardens pool and childcare center, adjacent to the Woodley Gardens park, there may be an opportunity to enhance resources at this location for all local residents.
- 4) Community Facilities: Goal 4 and policies 8 and 10 may integrate well into Montgomery College's concept of a "College Town" and "Community Engagement". With libraries, community and senior centers, there are opportunities to bring College degree, certificate and continuing educational courses and events within walking/bicycling distance to all community residents. The College's campus provides facilities that could be of greater benefit for community residents through integrated college-city cultural events programming.

- 5) Environment: A model mixed use entry-level housing development could incorporate the most environmentally friendly components for use in urban-density housing. This could incorporate:
 - a. Geothermal heating/cooling
 - b. Solar energy with fuel cell or electric battery backup – to include possible use of electric cars supplying back-up energy when not in use; potentially creating a self-sustaining more efficient microgrid covering most daily electrical needs.
 - c. Electric cars on a “car-to-go” model, so no resident needs to own a car and as an alternative to public transit when appropriate.
 - d. High efficiency electrical and water appliances, faucets, toilets, showers.
 - e. Recycling as much gray water as possible into the local area.

- 6) Water Resources: The careful analysis of relative increases in water consumption and sewage needs would lead to an assurance that future construction uses the best conservation methods possible to assure minimal water waste and preservation of current green space. Safe drinking water and appropriate sewage treatment is critical for a healthy population. The local water disasters today relate to broken water mains and sewage lines that require urgent repair and ongoing maintenance. A most prudent approach would be to increasingly treat our environment as though we were living within a desert environment where water use is minimized and as much gray water as possible is used for local area irrigation and non-potable purposes.

- 7) Economic Development: Much of our competitive advantage might be derived from a collaborative relationship with Montgomery College where there is a goal to match education and training with local business needs and potential. With the Innovation Center located on the Germantown Campus and recent designation by Maryland as a Regional Institution Strategic Enterprise Zone, or RISE Zone, for Montgomery College’s Germantown Campus, there is potential to enhance the economic development of Town Center and other locations in Rockville with students educated and trained at Montgomery College who are meeting skills that benefit local businesses and entrepreneurs, in collaboration with Rockville Economic Development, Inc (REDI) initiatives.

- 8) Housing: Of specific concern is to build enough housing for the lower income groups given knowledge that affordable rent or mortgage is considered 30% of gross income – especially since the type of households described (page 197) match the type of occupations that are essential for building and maintaining a healthy community, workforce, and environment. For some, availability of affordable housing for these income brackets are entry level. With “exciting”, leading edge environmentally friendly high-density housing within mixed use zones will increase the probability that residents will be able to walk to work, enjoy local services provided by local businesses, and become active, voting, tax-paying residents of Rockville.

A second approach for single potential residents might use existing housing stock but allow for sharing by several individuals rooming together under a common charter.

To illustrate a highly successful national model for people trying to recover from addictive disorders: Oxford House. Started in Silver Spring, 1975, eight men seeking to stay clean and

sober decided to live together when a landlord mentioned he would loan the first month's rent to be paid back when residents were able. From this first Oxford House, there are over 2500 chartered men and women Oxford Houses across the United States, providing a clean and sober home for over 35,000 people/year. On a national budget of approx. \$7M/year – paying for outreach workers who help establish new Oxford Houses and assure compliance with their charters, and a revolving no-interest loan fund for first month's rent/security – independent landlords and utility companies collect over \$110M/year. While a majority of Oxford House residents initially may have been homeless or incarcerated, within a few months, almost all Oxford House residents will have employment. Average rent and utilities for each resident will cost approx. \$150/week. Oxford House residents are generally highly conscious of having a positive local community impact and being excellent neighbors.

This type of healthy 'fraternity' or 'sorority' housing model – modeled on the logic behind Oxford House - may be applicable for other populations, such as community college students, who may benefit from a structured self-supporting, self-run living situation who need a healthy low-cost place to live while receiving the education or skills needed for new employment.

- 9) Historic Preservation: Through innovations described within this example, a model is created that will have the same architectural importance as "Habitat 67", and the historical beginnings of Rockville that has been built helping disadvantaged and lower income populations – who have had the opportunity to prosper and enrich the community in which they lived. A solution that lowers the income disparity index within Rockville will create a historical legacy today for future generations.
- 10) Municipal Growth: While the thrust relates to the Municipal Growth Element (MGE) and Maximal Expansion Limit (MEL) for annexation of land around the current Rockville City limits, this should complement the internal will to increase population density within current city limits that lowers the current disparity coefficient, allows for populations employed at lower income levels to work and recreate without reliance of private automobiles, and decrease the net environmental cost of sustaining new and current residents.

Exhibit 30

Cynthia Kebba

From: Monica Saavoss <m.saavoss@gmail.com>
Sent: Wednesday, June 12, 2019 3:50 PM
To: Planning Commission
Subject: Master plan comment

Dear Planning Commissioners,

I was very pleased to see goal 4, policy 7 under the Environment chapter about promoting a healthy and sustainable food system for all residents. I ask that you also include "promoting plant-based foods" as part of that goal. Choosing plant-based foods is beneficial to our health and to the environment. Plant based foods require less water, fuel, and land to produce compared to animal products, and they result in fewer pollutants. Plant-based diets are also promoted by organizations such as American Heart Association as proving a myriad of health benefits. Finally, eating more plant-based foods will result in fewer animals suffering on factory farms. Plant-based foods are an important part of a healthy, sustainable, and community-oriented food system.

Thank you so much for your important work on this plan.

Sincerely,
Monica Saavoss

408 Mclane Court
Rockville, MD

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan, Draft for Planning Commission Public

Exhibit (31)



MEMORANDUM

June 13, 2019

TO: City of Rockville Planning Commission

FROM: John Becker, Chair, Rockville Environment Commission *John Becker*

SUBJECT: Written Testimony on the City of Rockville 2040 Draft Comprehensive Plan for the Planning Commission as submitted by the City of Rockville Environment Commission

On behalf of the Rockville Environment Commission (REC) and volunteer members of REC Committees, I request you consider our comments and suggestions on the Draft 2040 Comprehensive Plan.

The format of our submission is an attached Excel spreadsheet with Comments listed numerically, referencing page #s, Chapter, Goal #, Policy # and Action Item with references to Existing Draft Comprehensive Plan text and corresponding Comments of REC.

We hope this format proves productive in your analysis/review. If there are any comments/questions/suggestions, please contact us via our Staff Liaison, Lise Soukup of the Rockville Department of Public Works, Environmental Management Division.

JB/lms

cc: Mark Pierzchala, Councilmember
 Environment Commission: Clark Reed, Fedon Vayanis, Steve Sprague, Monica Saavoss, Susan Koester, Pavitra Srinivasan, and Ted Stauderman
 Lise Soukup, REC Staff Liaison

Rockville Environment Commission (REC) Testimony and Comments on Draft Comprehensive Plan for Planning Commission Public Record - completed June 11, 2019

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
1	16	Land Use and Urban Design	Goals Box, Item 3			3. Integrate land use and transportation planning to maximize the value of Rockville's transportation assets.	Re-word this goal to include reduction in air pollution
2	16	Land Use and Urban Design	Goals Box, Item 4	11, 12, 13		4. "Promote walkable neighborhoods."	Promote seems like the wrong word for this goal. Rockville can only promote walkable neighborhoods if they exist. There are several that do, but they are limited. The goal should be to increase the number of walkable neighborhood. This can be done through infrastructure improvements in existing neighborhood and smart planning into new large development projects. Recommend changing the language to " Enhance the walkability of neighborhoods ".
3	16	Land Use and Urban Design	Goals Box			Goals for Rockville's Land Use plan include:	These goals should incorporate or specifically call out environmental ideas and/or objectives. Something like - Smart building to help reduce the heat island or stormwater overflow risk.
4	21	Land Use and Urban Design	1	1	New		Add Action 1.1 - " Rockville is committed to maintaining or increasing green space available for public use. "
5	21	Land Use and Urban Design	1			Adopt a Land Use Policy Map that clearly shows where continuity and change and growth will be allowed to meet community goals.	While supporting the overall goal, a comprehensive analysis of the impact of climate change should be undertaken and influence the land use policy map to ensure that most susceptible residents are not overly impacted by climate change.
6	24	Land Use and Urban Design	2	4		Draft new high-density residential zone for existing and new multiple-unit residential projects	We support high density mixed use development near the Metro stations and believe that the height limits need to be raised in those areas. Higher density developments lead to less energy use per unit due to fewer energy-losing walls and smaller units on average. It also promotes fewer vehicle-miles traveled because residents can commute via public transportation and walk to service centers such as day cares and grocery stores.
7	37	Land Use and Urban Design	4	11	11.1,11.2	11.1 Create new community nodes with small-scale retail, diversified housing, and civic amenities. 11.2 Continue to develop new walkable, mixed-use activity centers on available land, primarily commercial sites deemed ready for conversion.	Not sure where this comment goes, but here seems reasonable. In creating a more walkable community, Rockville should incorporate into any non-permeable coverings (parking lots, side walks), green alternatives, including solar reflective coatings to reduce heat build up, permeable surfaces to allow ground water to not overwhelm storm drains, etc.
8	37	Land Use	4	12		Develop plans for Rockville's older neighborhood shopping centers that address issues of pedestrian access, storefront aesthetics, land use mix, and urban design.	Agree strongly; please include improvement of tree canopy under this goal. Shade improves walkability particularly as summers get longer and hotter.

(31)

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
9	43	Land Use	5	16		16.7 Coordinate provision of neighborhood amenities as part of the approval process for conversions of office to residential uses.	People who don't take transit most often cite child care needs and grocery stores as a reason they "need" a car. Encouraging child care and grocery stores as part of the office park amenities will help office workers choose transit.
10	50	Land Use and Urban Design	9			And yet, the rewrite of the Zoning Ordinance in 2009 did not include a planned development option and no new PDs have been created since.	This sentence in the third paragraph is unnecessary. It looks like an internal conflict from one part of government to another. Adding sentences like this reduce the meaning of the rest of the page. Eliminate.
11	53	Land Use and Urban Design	9	25		Master plans for large development sites should include: an environmental analysis with identification of critical features for conservation;	This policy falls short. The REC believes that an environmental analysis should be mandatory for all commercial sites and large residential sites(over 1-2 acre not just large development sites. Revise bullet list for master plans to include: "an environmental analysis with identification of critical features for conservation and consideration of environmental impact "
12	53	Land Use and Urban Design	9	25	New		Add new Action: 25.3 - " Commit that any development of golf course property include a balanced environmental approach. "
13	53	Land Use and Urban Design	9	26	New	Undertake a study of minimum parking regulations and recommended changes to the Zoning Ordinance to promote access via modes other than private automobiles and reduce the financial and site development burden	Add the following Actions: - Allow business to pay a fee in lieu of parking that allows shared parking between businesses and/or exchanges parking requirements for requirements of incentives for employees/customer public transportation - Conduct a study where the sole focus is examining the potential effects of spill-over parking and ways to alleviate them.
14	59	Transportation	1	2	New	Vision Zero is an international movement to reduce and eliminate injury and death on roads from crashes involving vehicles, and vehicles and pedestrians and bicycles.	Agree strongly with Vision Zero goals. Add Action 2.1 - " Increase safety outreach to pedestrians through signage and other forms of public education. "
15	61	Transportation	2	3		Work with state and county transportation agencies to mitigate the impacts	The REC opposes the expansion of I-270 through Rockville by the State due to many environmental impacts, including impacts to air quality, wildlife, noise, hydrological effects, etc. It also will encourage further sprawl north of the City. Instead, the REC supports mass transit alternatives within the existing I-270 right-of-way.

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
16	65	Transportation	2	7		Develop creative solutions to capacity issues on major arterials and highway	Creative solutions including using existing networked and GPS based software for intersection lights to ensure smooth movement on major arteries. I have read about cities (including DC) that have implemented better timing for traffic signals to keep traffic moving. Key streets have an expected, or forced, traffic speed that allows a vehicle to continue moving at that speed through many intersections in an effort to reduce congestion. When the timing of the signals is in effect the reduction in congestion is evident. The added benefit of timing is the reduction of air pollution caused by vehicle acceleration. This project would have to include city, county, and state traffic managers and should include some kind of software analysis to allow for successful implementation.
17	77	Transportation	4	15	New	Improve Twinbrook Metro Station as an asset for the community.	Add new Action 15.3 - "Include stormwater mitigation, tree canopy/shade as part of these improvements. Shade could be provided by trees or solar canopies."
18	87	Transportation	20	20	20.3	Create a plan for a transition to electric cars and trucks that outlines steps the city will take to encourage use of zero- emission vehicles, including electric charging stations and new building code requirements for electric charging in new construction.	Revise Action 20.3 "or existing buildings" to end of sentence. "...and new building code requirements for electric charging in new construction or existing buildings."
19	100	Recreation and Parks		7	7.5	Retrofit existing community and recreation centers for energy efficiency and design new facilities using sustainable design principles.	Replace "for energy efficiency and design new facilities using sustainable design principles." with "to have an energy performance 30% better than the national median Energy Use Intensity (EUI) for these spaces, using latest national energy data from Energy Information Administration".
20	115	Community Facilities		2	2.7	Incorporate environmentally sustainable 'green' building practices in existing and new facilities.	Bring energy performance of existing buildings to perform in top 25% nationwide either through ENERGY STAR certification or an Energy Use Intensity (EUI) better than the national median (CBECS)
21	123	Environment	Vision			Rockville strives to assure clean land, air and water, and efficient use of resources, to foster healthy, sustainable, and resilient environments for living, working, and recreation.	This doesn't seem like a very lofty vision for the environment. Striving is weak. I would be interested in revising this statement completely and setting a vision for Rockville that goes beyond the ordinary. Something to the effect of "Rockville is a leader in its commitment to protect the environment through prudent management of our natural environment, encouragement of eco-friendly industries and a commitment to sustainable practices that assure a carbon neutral community along with clean air, land and water."
22	124	Environment	1			Bring an environment ethic when setting city policies and weighing options or actions.	Change 'Bring' to 'Mandate' or some other word that makes this a full-on commitment by the city of Rockville
23	124	Environment	2			Cut greenhouse gas emissions and prepare for climate change.	This is not a measurable goal. This is such an important goal that we should have some measure of success. i.e. Cut greenhouse gas emissions to ensure a Carbon Neutral community. I don't know what 'prepare for climate change' means.

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

19

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
24	125	Environment	1	1		Establish and promote an environmental ethic, or set of values and principles, that guide the policies and actions of the City of Rockville.	Add Action 1.6 - "Every policy or development project include an environmental consideration of the long term implications to the environment."
25	125	Environment	1			...this approach is the foundation of an environment ethic, which the city will use in decision making for city facilities and actions, and promote to the rest of the community.	Include examples of generally accepted methodologies that may be considered or used as part of the decision-making process when assessing competing environmental priorities especially in complex scenarios. E.g., lifecycle assessment (LCA), multi-criteria decision analysis (MCDA). Some seemingly green options may in fact be less environmentally friendly due to higher emissions in their manufacturing phase or emissions may be transferred elsewhere e.g. China producing the solar panels
26	125	Environment		1	1.3	"lead by example..."	revise: "... City of Rockville shall lead by example.
27	126	Environment	2		new		Add new Action: 2.5 - "Execute a comprehensive analysis of climate change on the City and incorporate the findings into land use and transportation plans."
28	126	Environment		2	2.1	"Promote and support..."	add: "including City of Rockville..."
29	128	Environment	2	3	new		Include the idea of promoting awareness of energy conservation along with energy efficiency and use of renewable energy among the City's population. TI would be in line with the Environmental ethic of Goal 1, Policy 1, Action 1.1 as well)
30	128	Environment		3	3.1	current language states implement projects at city facilities	suggesting using this for all 2040 sections where "...City of Rockville shall..." adopt the policy.
31	130	Environment	2	4	4	...Incorporate energy efficiency, renewable energy, and alternative fuels in city facilities, operations, and fleet	Include the idea of promoting awareness of energy conservation along with energy efficiency and use of renewable energy among the City's population. TI would be in line with the Environmental ethic of Goal 1, Policy 1, Action 1.1 as well)
32	130	Environment	2	4		And as reductions are made in residential and commercial building emissions, through efficiency and renewable energy sources, the percentage of total carbon emissions from the transportation sector will increase	The RELATIVE contribution of emissions by the transportation sector will surpass emissions from the built environment/electricity consumption.
33	130	Environment	2	5		Assess risks and vulnerabilities in Rockville of climate change and identify actions to mitigate localized impacts	Add: ...mitigate localized impacts and ADAPT TO CHANGES (Resiliency development in the action items refers to adaptation, not just mitigation of impacts)
34	130	Environment		4			Add traffic flow management to optimize movement in City and reduce station traffic periods at traffic lights (reduce energy consumption and emissions) via latest traffic mgmt. products.
35	130	Environment		4			Add: increase safe walkable/bikeable travel.

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

15

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
36	133	Environment		6	6.4	Incorporate green building strategies in the construction, expansion and retrofit of city facilities.	Bring energy performance of existing buildings to perform in top 25% nationwide either through ENERGY STAR certification or an Energy Use Intensity (EUI) better than the national median (CBECS).
37	133	Environment		6		New action item	Add: "All new residential construction will be zero net energy (ZNE) by 2025. All new commercial construction will be ZNE by 2030. 50% of commercial buildings will be retrofit to ZNE by 2030. 50% of new major renovations of city buildings will be ZNE by 2025."
38	133	Environment		6	6.5	work with local utilities, property owners...	Add: community organizations funded by city, also HOA's and Condominiums
39	134	Environment	4	7	New	Foster individual and community health by reducing stress and exposure to toxins, while providing access to healthy foods and a verdant environment.	Add worker health and safety to Policy 7 and Add New Action Item 7.5: "Ensure Rockville places a high value on worker health and safety for city workers and contractors engaged in providing city services and construction (e.g., sanitation workers, road and building construction, fire and EMS crews)." As noted in the Introduction of the Mast Plan: waste management workers are among the largest group employed by the City; construction (4.5%); manufacturing (2.6% does this include stone yards, quarries, concrete plants?). Sanitation and fire and EMS groups tend to have high injury and mortality rates in compared to the general worker population.
40	135	Environment	4	7	New	Healthy communities to combat obesity and sedentary lifestyles and low access to grocery stores.	Add New Action Item 7.6: Mention increasing well lit and safe walkable/bikeable routes and paths to provide better access to grocery stores. This issue is discussed in the land use section but consider including a cross-reference in the action item to the land use section.
41	135	Environment	4	7		Another important approach to reducing stress and ameliorating local air pollutants is to provide green living plants as part of development projects and the city streetscape. The green of trees, shrubs, and groundcover help to reduce stress and are important additions in areas of land use change. Living plants also produce oxygen and remove some air pollutants. Shade from trees is important to reducing the heat island effect of hard surfaces. A biophilic approach can be incorporated in city greenspace management planning.	Could not agree more strongly. Suggest this sentiment be referenced in the transportation, changing land use sections.
42	137	Environment	5		All		Great action items! (To increase awareness of reduction in consumption of materials and promoting backyard/neighborhood composting.)
43	137	Environment		8	8.4	"Incorporate and clarify current recycling, refuse and yard waste storage, handling and collection practices into Chapter 20 of the City Code, Solid Waste."	The REC should be a part of the process to update Chapter 20, Solid Waste, beginning with FY 2020.
44	139	Environment		9	New		Add Action 9.3 - "Increase forest easement acquisition efforts."

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
45	141	Environment	6	11		In order to balance between environmental goods, the number of required trees should be less in areas targeted for intense urban growth.	Call out the use of green building features (viz. green roofs, green walls) so th increased greenery offsets the reduced tree cover in these areas. Captured or p.143, Action 11.1
46	143	Environment	6	11	11.1	Revise the Forest and Tree Preservation Ordinance to consider context, to find a balance between the number of required trees and city objectives for stormwater management, solar or renewable energy, improved air quality through the reduction of vehicle miles traveled, green building features, and other important environmental goals	Call out the use of green building features (viz. green roofs, green walls) so th increased greenery offsets the reduced tree cover in these areas and help reduce heat island effect. Another example of how cross-referencing could be helpful.
47	169	Water Resources	4	13	New		Currently the action items only reference pesticides, herbicides etc. in backyard and green covered spaces not paved surfaces. Add New Action Item 13.4: " Increase public awareness of and alternatives for harmful snow-melt compounds on residential and commercial property paved surfaces. With dramatically changing temperature and precipitation patterns over winters in the Mid-Atlantic area it would be productive to engage/remind the public to use less harmful and more Ba safe products. "
48	All	All			New		Provide a Glossary and a Cross-Reference Index in the back of the Comprehensive Plan document. This is helpful since many topics (e.g., environment, green building design) occur across more than one section or touch on multiple planning elements.
49		Recreation and Parks	4 and 5	11		Value the important conservation role that Rockville's parks play in protecting steep slopes, streams, wildlife corridors, and forests.	The action items should include a commitment to using green appropriate landscape plans. Currently, I've walked on multiple non-permeable walking pa in Rockville parks. While there are economic and maintenance trade-offs, Rockville should commit to updating existing park infrastructure to reduce non-permeable surfaces.
50		All	All				Consider including, where feasible, more detail to Goals or Actions with respect to Measurability (metrics) and/or Time frame of achievement/implementation. SMART Goals and Objectives help with commitment and accountability. If there is a concern about being locked into specific numbers then at least define mor general terms such as short-term, medium-term, long-term in the introduction and use those throughout for goals and actions.
51	128	Environment	2	3	3.1	Implement projects at city facilities to improve energy efficiency, renewable energy, and back-up generation for critical city facilities and services	Add second sentence to Action 3.1: " All construction at city facilities will m LEED, Energy Star, or similar certification standards for energy efficiency and sustainability. "

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

31

Comment #	Plan Page	Chapter	Goal #	Policy #	Action Item #	Existing Draft Comprehensive Plan text/summary	Comment (Comments in bold are suggested wording for the item.)
52	134	Environment	4	7	7.1	the focus in this Environment element is placed on impacts of noise and air pollution, access to healthy food, and proximity of green living plants and wildlife.	Add water to noise and air pollution wherever pollution is mentioned.
53	135	Environment	4	7	7.3	Cultivate a local food system that provides residents of all income levels access to healthy fresh food and improves food security.	Revise text in Action 7.3 to read: "... access to healthy, plant-based fresh food..."

Attachment 2.A.a: Testimony Full - Water & Environment (2762 : Work Session 5: Comprehensive Plan,

51

Exhibit 32

Rockville 2040 Comments

On Land Use and Housing

Land use and housing dominate the Draft Comprehensive Plan, accounting for 60 pages - approximately 25% of the document. And for right reason. The plan shows that Rockville will add nearly 20,000 new residents in the next two decades, an increase of more than 25%. The city addresses the looming housing crunch up front, as one of the city's principles listed is:

"Encourage a variety of housing types that are accessible to a wide range of households and incomes"

The plan does a good job of identifying ways to increase housing units without disturbing the fabric of Rockville's existing neighborhoods. However, I think that the population growth and potential housing shortage provide an innovating opportunity for the city that should be noted in the plan: , the city should explore options beyond traditional zoning to accommodate the growing population. In addition to adding density through multi-family or mixed used properties surrounding our metro centers, I encourage the city to research and consider adopting **form-based codes** in those areas ringing the immediate metro centers - neighborhoods that are currently dominated by single-family homes within easy walk to public transportation hubs. This would directly support Goals 1 and 2 in the Land Use section.

While this would be an extraordinary systemic shift for the city, it has been successfully implemented in larger municipalities - and it would also satisfying (if not outright eliminate) several of the related policies and goals as it relates to adding a variety of housing types while protecting neighborhood aesthetics.6

Policy 8 in the Land Use Section mentions "car less customer base"... the city should **de-couple or overhaul parking requirements** in new developments in Town Center and South Pike areas. If you want to build a car-free resident base, build housing without parking, and people without cars wil buy them. It's about more than having conveniences within easy walking distance.

On Walkability

I fully support the city's efforts to create a more walkability Rockville and support the nodes concept. Beyond what is written, I think **the city needs to address the four main aspects of walkability** when planning, reviewing, and approving new projects - whether public works or private development. These considerations are:

- Safety (goes without saying)
- Comfortable (is the sidewalk wide enough? Is there a buffer between the sidewalk and road?)
- Interesting (what does the street scape look like - trees, store fronts, lighting, etc)

- Useful (can we walk to wherever we need?)

Safety can be implemented immediately through many means - some of which the city is already doing (lowering speed limits, installing flashing pedestrian crossing signals, etc.). Many of the other factors that improve walkability required a more holistic approach to how the city is planned - not just sidewalk and conduit design, but the design of our road system.

Here is a very specific hyper local example:

There have been a rash of pedestrian/vehicle collisions on Beall Avenue in the past 10 months. This coincides with the completion of the Metropolitan Building/The Spot food hall and assorted roadwork "improvements." Beall Avenue goes from a quiet yield street on the west side of North Washington Street to a four lane boulevard in the time it takes to cross an intersection. This encourages drivers to increase speed in an area where there are two mid-blocks pedestrian crosswalks. This stretch of Beall should remain two lanes. Even with a posted lower speed limit, drivers will drive the speed a road allows them to...and Beall encourages speed.

And that's the easy culprit. But the headwater of the problem begins elsewhere. For vehicles leaving West End, Woodley Gardens and College Gardens neighborhood via Martins Lane to reach 355 south must either

1. Turn left on North Washington, inevitably wait at the light and make the hard right onto 355
2. Turn right (on red or green) onto North Washington then left onto Beall (via dedicated turn lane), then right onto south 355.

The design of these roads (which granted are many years old and constrained by the triangular shape of the commercial area at 355/North Washington) encourage motorists to travel the more "pedestrian friendly" streets.

Also, **stop putting trees in the median areas** so they are in the direct sight line of a driver looking for a pedestrian crossing at a crosswalk. Use other foliage.

On Retail Rocks

Would like to see the city encourage more **pop up retail or kiosks** of local merchants selling wares - outside of locations like the Farmers Market or Dawsons...perhaps negotiated into new mixed use development regulations.

On Transportation

I'm on board (pun!) with the plan's recommendations on transportation. I **support the growth of public transit in all forms**, though I have my hesitations about BRT, personally. I definitely

support the city's vision of transforming Rockville Station for the 21st century. Good luck to us all there.

On Policy 17 - Pedestrian Master Plan

I would personally volunteer to assist this effort. I think this will be critical to achieving Vision Zero and making Rockville a truly walkable city.

On Parks

City parks that include walking/biking trails that connect neighborhoods (as opposed to those that circumscribe the park) **should be well lit for safety and walkability.**

On Water

If the city ever finds \$60-80 million (maybe under a rock or in our couch cushions), we should **invest in upgrades to the water treatment plant.** The half-century-old facility is vital to the city's day-to-day survival. And while it operates under capacity - even as our city grows - an investment in a modern facility now will be of great benefit over the next century.

Cynthia Kebba

From: Sarah Salazar <mariposarah@gmail.com>
Sent: Monday, June 17, 2019 11:28 PM
To: Planning Commission
Subject: Testimony on the Rockville 2040: Draft Comprehensive Plan for Planning Commission Public Hearing

Hello, My name is Sarah Salazar, I live at 5941 Lemay Rd., Rockville, MD 20851. I am providing comments/testimony on the Rockville 2040: Draft Comprehensive Plan for Planning Commission Public Hearing. I have general comments and comments on the "Land Use," "Environment," and "Water Resources" elements of the plan.

General

- It would be helpful if the introduction included a flowchart that clearly illustrates the steps involved in this plan review, approval, and implementation, as well as how this plan is used to guide/inform other more specific land use plans in Rockville.
- The draft plan references Rockville's past Comprehensive Plans and provides some statistics describing progress that has been made in the goals under various elements over time. I think the plan could be more effective if it included more such measures of accountability. It could include more comparisons of data collected for the previous comprehensive plan and explicitly identify areas where we are achieving our ongoing goals and areas where we are falling short. This information would help us to capitalize on our successes and focus energy on addressing the shortfalls.
- The plan includes many maps displaying data used to describe all the elements as they exist as well as proposed changes. However, these data are not shown at a scale or in combinations that allow the public to fully understand how they overlap and may interact. It would be helpful if all of the GIS data used to develop the Draft Comprehensive Plan were available on an interactive map on the city's website. The city uses interactive maps on its website already to show the public the current zoning and land use information. A complementary interactive map with the data for the draft 2040 Comprehensive Plan would allow the public to: 1) better understand how proposed changes may affect all of the elements discussed in the plan, and 2) contribute more effectively on future decision-making opportunities.

Land Use

- On page 63, Policy 5 discusses exploring opportunities for new east-west connections only briefly. I suggest elaborating on this brief paragraph to include a thorough explanation of the constraints, including costs, as well as specific opportunities that exist for new east-west connections across the metro and train tracks. This portion of the 2040 vision of Rockville is too vague as currently described, and is therefore unlikely to be effectively considered during future development projects. Providing more background information on the constraints could inspire innovation and collaboration from developers, residents, and the city to achieve this goal.

Environment

- The draft plan provides statistics on existing greenhouse gas emissions and discusses goals and actions to minimize the effects of climate change by reducing these emissions. Thank you for considering climate change in this plan and in future decisions. In addition, pages 139-143 includes statistics on the tree canopy in Rockville. Given the goals to preserve and enhance vegetation in the city and the fact that Rockville is a "Tree City USA", the plan should include not only estimates of Rockville's carbon emissions, but also estimates of how much carbon is sequestered in Rockville's city trees and natural areas, and in residential areas. The plan could also identify mowed areas that could be planted with native trees that could increase our rates of carbon sequestration. If the term carbon sequestration is included in the final plan, please include a definition to facilitate broad understanding.
- On page 128, action 3.4 states "Promote renewable energy systems, microgrids, energy storage, and district energy systems." It is unclear how the city will implement this action. Please clarify this statement with a description of how this would be done and provide potential examples. Also, to facilitate public review, it would be helpful to include definitions of "microgrids" and "district energy systems" in footnotes.
- On page 134, it would be helpful if the plan included a definition of "biophilic" in a footnote. Please elaborate on how the city would incorporate a "biophilic approach" in city greenspace management planning. Also, the associated actions on page 135 do not include any means to measure success. I suggest rephrasing them so that they are clearer and measurable to facilitate implementation and future evaluation.
- On page 141, the "Urban Tree Canopy and Forest Protection" table would be easier to understand if the UTC was reported at the bottom of the table (as a total). Also, the rows for FCE and Forest Preserves could be indented further to more clearly show that they are sub-categories/sub-totals of private property and city-owned, respectively.
- At the bottom of page 141, it states that "In order to balance between environmental goods, the number of required trees should be less in areas targeted for intense urban growth." To better "balance between environmental goods" in intense urban growth areas, the plan could include a goal to explore opportunities to create green spaces by requiring combinations of solar panels and types of vegetation

compatible with dense development, such as green rooftops, terraces with planters, and green walls within and outside of the buildings.

- The caption of figure 22 on page 142 refers to a "lease weasel". Should this instead be the "least weasel" (*Mustela nivalis*)?
- On page 143, as a companion to Action "12.5 Monitor and manage invasive species and enhance habitats on city-owned lands", I suggest adding this (or similar) action: "Monitor and remove litter on city-owned lands to protect and enhance wildlife habitat" because litter is a problem on some city-owned lands and it contributes to environmental degradation.

Water Resources

- The forested stormwater management area within the Twinbrook Metro station plot needs maintenance. During storm events litter floats in the ephemeral pond that forms there and it may be clogging this area. The comprehensive plan should include, as an action, regular monitoring of stormwater treatment areas and regular trash removal to prevent both damage of the systems and transport of litter downstream within the watershed. In addition, the trees within the Twinbrook Metro stormwater management area are covered in English ivy and other non-native invasive vines. The invasive vines could stress and eventually kill the trees, which could also damage or clog the stormwater treatment infrastructure and would adversely affect our ability to achieve various other goals in the comprehensive plan (e.g., preserve existing trees). The comprehensive plan should include requirements for wetland-appropriate treatments of non-native invasive plants as part of regular maintenance of the city's stormwater management areas.

Thank you in advance for considering these comments.

Sincerely,

Sarah Salazar

Sent from my iPhone

Exhibit (37)



King Farm Citizens Assembly, Inc.
 300 Saddle Ridge Circle
 Rockville, MD 20850
 301-987-0122

Rockville Planning Commission
 c/o Cindy Kebba
 111 Maryland Avenue
 Rockville, MD 20850

Cindy Kebba,

Re: Written testimony from the King Farm Citizens Assembly on the Rockville City 2040 Comprehensive Plan

The King Farm Citizens Assembly has had the opportunity to review the latest draft of the Rockville 2040 Comprehensive Plan. While KFCA is generally supportive of the elements of the Plan and the information presented in the Plan we are concerned about particular points in the plan.

Land Use and Urban Design. Policy 7 calls for the City to “review and enforce regulations on shared housing and develop standards for short-term residential rentals.” The KFCA supports the intent of this Policy and looks forward to working together to “develop standards and regulations to address potential issues” of short-term rentals which, due to internet companies, seem to be a growing issue within King Farm.

We note that the King Farm Metro station falls outside of the city’s boundary currently, and thus is not included in the Land Use and Urban Design portion of the plan. While the KFCA understands that planners focus is on Rockville as it currently is incorporated, we urge you to include the Shady Grove Station as part of your planning similar to the Twinbrook or Rockville stations. It is an integral part of the King Farm community and development around should take it into account.

Policy 20 calls for the city to “support retail uses along Rockville’s commercial corridors and other shopping areas.” KFCA is in agreement with the planners that “off-site signage, where deemed useful and beneficial, to direct customers to Rockville’s shopping areas that are not visible from major arterials” as is the case with King Farm’s Village Center.

Transportation. There is complete agreement by KFCA with the Rockville City 2040 Comprehensive Plan when it comes to implementing a Vision Zero plan. Pedestrian safety is an ongoing concern to the residents of King Farm and the recently created Pedestrian Advocacy Committee is a step in the right direction. KFCA looks forward to working with the city and others to implement a Vision Zero plan.

Policy 8 makes mention of “restricted turning movements along MD 355.” KFCA notes that “restricted turning” at the intersection of Redland Boulevard and MD 355 also leads to increased traffic along Elmcroft Boulevard as drivers cannot turn on MD 355 and must therefore cut-through King Farm to

37

continue on to MD 355. The KFCA asks that the Plan include advocating for SHA to investigate allowing a left-turn movement from westbound Redland Boulevard onto MD 355.

Policy 13 is to “Plan for implementation of bus rapid transit (BRT) lines in Rockville. The KFCA has no issue with this statement or the implementation of BRT in the City. However, Action 13.3 states: *“Support implementation of the Corridor Cities Transitway, which was a central component to the development of King Farm”*. It is with this statement that we disagree. The KFCA has been working with State, County and local officials to remove the CCT from King Farm for close to 10 years. King Farm is 22 years “old” and has for this many years survived quite well without a project which will adversely affect the functioning of the community, devalue properties along the route, impede traffic flow on King Farm Blvd and generally disrupt the ability of residents to traverse the community by vehicle and on foot. We are in support of proposals by the County Executive to re-route the CCT out of King Farm and on to Shady Grove Road which will support greater economic development in the north end of Rockville.

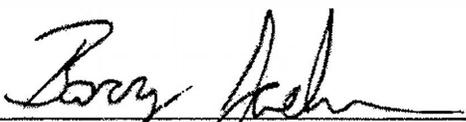
Policy 19 mentions “e-scooters” or other similar devices. While we are certainly in agreement that these devices are desirable in their overall impact of reducing carbon emissions recent experiences in other municipalities indicate that their use should be addressed sooner rather than later. KFCA urges the planners to add an action item in regard to safe usage of such devices.

Environment. The KFCA is supportive of your recommendations to commit Rockville to the preservation and protection of shared natural resources in the city’s land, water resources and air. Policy 6, in particular, appears to hold particular interest to the KFCA as it will impact the updating of our own architectural standards. We look forward to working with you and the city on the action items and the pace with which they will be implemented.

Policy 7 touches upon the idea of community gardens and includes an action item (7.4) to “Identify community garden sites on public property, including parks, recreation and senior centers, public easements and right-of-ways, and surplus property.” The KFCA supports the expansion of community gardens, but we would hope that the Plan will include the “preservation of existing community gardens” as a priority. King Farm is fortunate to have two existing community gardens that are both utilized by residents in the way envisioned by the planning commission.

Thank you for the opportunity to comment on the Comprehensive Plan. We hope that City Staff and the Planning Commission will take appropriate action on these segments of the 2040 Plan. If you would like to contact us, please email management@kingfarm.org.

King Farm Citizens Assembly



Barry Jackson, Board of Trustees Chair

**COMPREHENSIVE PLAN: Planning Commission Public Hearing Draft
Summary of Testimony from March 14 - June 18, 2019**

Exhibit #	Information Source Name and Address	Enviro	Water Res	Summary of Comments	Staff Comments
ENVIRONMENT TESTIMONY					
11	State of Maryland: Department of Planning	x		<ul style="list-style-type: none"> • MD Planning states that the Draft Plan includes excellent information regarding climate change, pointing out Policy 5 (pg. 130) in particular. It also acknowledges that applicable policies and actions are also included in the Water Resources chapter. • MD Planning states that the City could build upon its discussion of climate change adaption by adding an action under Policy 5 "for the city to work with the county health department and the county office of emergency management to identify, develop and obtain funding for projects and programs that would reduce current and future climate change impacts to the city's vulnerable natural resources, infrastructure, buildings and populations." (Exhibit 11, pg. 8) 	<ul style="list-style-type: none"> • Re: adding a new action item under policy 5 to address working with county health department and emergency management: Staff agrees that these partners should be added to Policy 5 actions and recommends adding to the list of these agencies to the list of partners in Action 5.1. • Pg. 30, Policy 5: Public Works staff would also recommend clarifying the text for the overall Policy. Staff suggests clarifying that Policy 5 is more focused on climate adaption, rather than climate mitigation, which is more the focus of Policies 2, 3, and 4. Staff suggests the following text refinement for Policy 5: "<u>Assess Rockville's climate-related risks and identify actions to reduce vulnerability and enhance local adaptation and resiliency capacity.</u>"
14	Kenneth Hoffman Auburn Avenue, Rockville, MD	x		<ul style="list-style-type: none"> • Encourages environmentally friendly components for use in urban density and mixed use housing. Lists 5 specific options that could be used. (Exhibit 14, page. 3, item #5) 	<ul style="list-style-type: none"> • Policy 6, pg. 133 addresses this issue but without identifying specific techniques. The city refers to Green Building standards in the green building codes to promote various options, including many of those listed in Exhibit 14. Staff recommends not listing specific techniques as technology changes regularly.
30	Monica Saavoss Mclane Court, Rockville, MD	x		<ul style="list-style-type: none"> • Add "promoting plant-based foods" as part of Policy 7 (pg. 134). 	<ul style="list-style-type: none"> • The plan focuses on access to healthy foods, in general, and does not recommend one healthy diet over another. Promoting plant-based foods, specifically, is too detailed for a comprehensive plan, however, the issue is addressed generally through the plan's promotion of community gardens and farmer's markets.
31	Rockville Environment Commission, John Becker, Chair	x		<ul style="list-style-type: none"> • Comment #21. Vision, pg. 123. Revise vision to a loftier statement. Suggested language is included. • Comment #22. Goal #1, pg. 124. Change the word "bring" to "mandate." • Comment #23. Goal #2, pg. 124. This is not a measurable goal. This is such an important goal that we should set some measure of success. i.e. Cut greenhouse gas emissions to ensure a Carbon Neutral community. • Comment #24. Policy 1, pg. 125. Add an Action 1.6 stating that "Every policy or development project include an environmental consideration of the long term implications to the environment." • Comment #25. Pg. 125, 2nd paragraph. Include examples of generally accepted methodologies that may be used as part of the decision making process. Some specific examples provided. • Comment #26. Policy 1, Action 1.3, pg. 125. Change from "lead by example" to "the City shall lead by example....." • Comment #27. Policy 2, pg. 126. Add an action item to state: "Execute a comprehensive analysis of climate change on the City and incorporate the findings into land use and transportation plans." • Comment #28. Policy 2, Action 2.1, pg. 126. Include "the City" in the Action item. • Comment #29. Policy 3, pg. 128. Include the idea of promoting awareness of energy conservation along with energy efficiency and use of renewable energy among the City's population. • Comment #30. Policy 3, Action 3.1, pg. 128. Add the City "shall" • Comment #51. Policy 3, Action 3.1, pg. 128. Add second sentence to Action 3.1: "All construction at city facilities will meet LEED, Energy Star, or similar certification standards for energy efficiency and sustainability." 	<ul style="list-style-type: none"> • Comment #21 Response: Staff is comfortable with the current vision statement, but the Planning Commission may further discuss the language if it so chooses. Visions and Principles will be discussed at the last work session. • Comment #22 Response: The Comprehensive Plan is a guiding document and the word mandate is not appropriate. Regulations and Ordinances are mandates. • Comment #23 Response: The chapter goals are overarching and big picture. The policies and actions contain more details that can be measured. For example, the Climate Action Plan referenced in Action 2.2 will be developed with much of the referenced details. • Comment #24 Response: This is too sweeping of a statement for the Comprehensive Plan and could lead to unintended consequences. Further, the City already does consider environmental impacts when reviewing development projects by applying, for example, the tree preservation ordinance, stormwater management practices, and reviewing on-site natural areas. • Comment #25 Response: Should the City decide to pursue the suggested methodologies, or other alternatives, details would need to be fleshed out further to determine which methodology would be most appropriate at the local level. Not including certain methodologies does not preclude them from being utilized if the city chooses. • Comment #26 Response: The word "shall" is for regulatory documents, not Comprehensive Plans, which are guides. • Comment #27 Response: The State of MD had a related comment and staff recommended refining the language for Policy 5 of pg. 30. The refined language, along with Action item 5.2 addresses this issue, albeit in a more generalized manner but appropriate for a broad policy document. • Comment #28 Response: Staff agrees and proposes for Action 2.1: Promote and support collective and individual actions by the City, residents, and businesses..... • Comment #29 Response: Staff agrees. Language could be added to Action 3.3 (pg. 128) to read: Work with <u>and educate</u> property owners <u>and tenants</u> to make buildings more energy efficient..... • Comment #30 Response: The word shall is for regulatory documents, not Comprehensive Plans, which are guides. • Comment #51 Response. City buildings are currently subject to the Green Building Code. The proposed action would require Mayor and Council direction to ensure program resources and capital funding. Similar language to what is recommended could be added to Action 3.1, pg. 128 such as: <u>Work toward meeting LEED, Energy Star, or similar certification standards for energy efficiency and sustainability for city buildings.</u>

Exhibit #	Information Source Name and Address	Enviro	Water Res	Summary of Comments	Staff Comments
31	Rockville Environment Commission, John Becker, Chair	x		<ul style="list-style-type: none"> • Comment #31. Duplicate of Comment #29 • Comment #32. Policy 4, pg. 130. Add the word "relative" to the last sentence of first paragraph. • Comment #33. Policy 5, pg. 130: Add:.... Mitigate localized impacts and adapt to changes. • Comment #34. Policy 4, pg. 130. Add traffic flow management to optimize movement in City and reduce station traffic periods at traffic lights (reduce energy consumption and emissions) via latest traffic mgmt. products. • Comment #35. Policy 4, pg. 130. Add: increase safe walkable/bikeable travel. • Comment #36. Policy 6, Action 6.4, pg. 133. Bring energy performance of existing buildings to perform in top 25% nationwide, either through ENERGY STAR certification or an Energy Use Intensity (EUI) better than the national median (CBECS). • Comment #37. Policy 6, pg. 133. Add a new action item: "All new residential construction will be zero net energy (ZNE) by 2025. All new commercial construction will be ZNE by 2030. 50% of commercial buildings will be retrofit to ZNE by 2030. 50% of new major renovations of city buildings will be ZNE by 2025." • Comment #38. Policy 6, Action 6.5, pg. 133. Add "community organizations funded by city, also HOA's and Condominiums" • Comment #39. Policy 7, pg. 134-135. Include worker health and safety and add an action item: "Ensure Rockville places a high value on worker health and safety for city workers and contractors engaged in providing city services and construction (e.g., sanitation workers, road and building construction, fire and EMS crews)." • Comment #52. Policy 7, Action 7.1, pg. 134. Add water to noise and air pollution wherever pollution is mentioned. • Comment #53. Policy 7, Action 7.3, pg. 135. Add "plant-based" to read: ".....access to healthy, plant-based fresh food....." • Comment #40. Policy 7, pg. 135. Add a new action item about increasing well lit and safe walkable/bikeable routes and paths to provide better access to grocery stores. • Comment #41. Policy 7, pg. 135. Reference content from Policy 7 (first full paragraph of the second column) in the land use and transportation elements. • Comment #42. Policy 8, pg. 137. Great action items. • Comment #43. Policy 8, Action 8.4, pg. 137. The REC (Rockville Environment Commission) should be a part of the process to update Chapter 20, Solid Waste, beginning with FY 2020. • Comment #44. Policy 9, pg. 139. Add a new action item: "Increase forest easement acquisition efforts." • Comment #45. Policy 11, pg. 143. Call out the use of green building features so the increased greenery offsets the reduced tree cover in these areas. • Comment #46. Policy 11, Action 11.1, pg. 143. Call out the use of green building features so the increased greenery offsets the reduced tree cover in these areas and help reduce heat island effect. A cross reference would be helpful. 	<ul style="list-style-type: none"> • Comment #31 Response: Duplicate. See Comment #29 response. • Comment #32 Response: Staff concurs. The sentence would read: "And as reductions are made in residential and commercial building emissions, through efficiency and renewable energy sources, the <u>relative</u> percentage of total carbon emissions from the transportation sector will increase." • Comment #33 Response: Also in response to a similar comment from the State of Maryland (see 2nd comment from table, Exhibit 11), Staff recommended refining the wording for Policy 5. The refined wording better addresses this comment. • Comment #34 Response: The city does manage the signals it owns, taking into account and balancing many variables. Many of the signals within the city are owned by SHA and controlled by the County. Improving traffic management is also addressed in the transportation element (Policies 9 & 20). • Comment #35 Response: Addressed in Action 4.1 from the perspective of reducing greenhouse gas emissions. Increasing safe travel options is addressed in the transportation element (Policies 1, 2, 16) • Comment #36 Response: In general, this topic is addressed in Action items 3.3 and 6.3. A move toward requiring these specific measures would necessitate direction and financial resources from the Mayor and Council to meet such a mandate and the cost programmatic implications associated with the requirement. • Comment #37 Response: In general, this topic is addressed in Action items 3.3, 6.1, 6.2 and 6.3. The level of detail is beyond the scope of the Comprehensive Plan. A move toward requiring these specific measures would necessitate direction and financial resources from the Mayor and Council to meet such a mandate and the cost and programmatic implications associated with the requirement. • Comment #38 Response: Staff agrees. Action item 6.5 could be refined to read: "Work with local utilities, property owners, <u>Home Owner and Condo Associations, community groups</u>, and real estate professionals to promote the long term value of green buildings, including safer materials, and lower utility costs." • Comment #39 Response: Workers are included in the reference to "individuals and community" in the Policy 7 statement. The proposed new action item seems overly specific for the Comprehensive Plan, and it was not brought up as an issue during the community engagement process. Human Resources and Risk Management addresses these issues for the city. • Comment #52 Response. The Plan includes the Water Resources Element to specifically address water issues. The chapter is cross referenced in the first paragraph on pg. 124. • Comment #53 Response. Exhibit 30 also includes this suggestion. Staff believes that the plan focuses on access to healthy foods, in general, and does not recommend one healthy diet over another. Promoting plant-based foods, specifically, is too detailed for a comprehensive plan, however, the issue is addressed more generally through the plan's promotion of community gardens and farmer's markets. • Comment #40 Response: As mentioned in the comment, this topic is addressed in the land use element. Walking and biking is also addressed in the transportation element. Rather than add a new action item to Policy 7, staff recommends cross-referencing those chapters. • Comment #41 Response: A cross-reference could be made in those chapters. • Comment #42 Response: Thank you. • Comment #43 Response: The City has standard procedures for ordinance changes to incorporate city commissions and boards and public comments and welcomes input and comments from Boards and Commissions. • Comment #44 Response: Action items 12.1 and 12.2 address this issue on pg. 143. Staff suggests that action item 12.1 may be more appropriate as part of Policy 9, rather than Policy 12. • Comment #45 Response: Staff has added examples of green building features to Action 11.1. • Comment #46 Response: Staff has added examples of green building features to Action 11.1. In addition, a cross-reference to Goal 3 (pg. 133), "Sustainable Design with Green and Healthy Buildings" could be added to this Policy.

Attachment 2.A.b: Testimony Summary Matrix - Water & Environment (2762 : Work Session 5: Comprehensive Plan, Draft for Planning

Exhibit #	Information Source Name and Address	Enviro	Water Res	Summary of Comments	Staff Comments
36	Sarah Salazar Lemay Road, Rockville	x		<ul style="list-style-type: none"> • Pages 139-143 includes statistics on the tree canopy in Rockville. Given the goals to preserve and enhance vegetation in the city and the fact that Rockville is a "Tree City USA", the plan should include not only estimates of Rockville's carbon emissions, but also estimates of how much carbon is sequestered in Rockville's city trees and natural areas, and in residential areas. • The plan could also identify mowed area that could be planted with native trees that could increase our rates of carbon sequestration. • If carbon sequestration is used in the plan, it should be defined. • Pg. 128, action 3.4 states "Promote renewable energy systems, microgrids, energy storage, and district energy systems." It is unclear how the city will implement this action. Please clarify this statement with a description of how this would be done and provide potential examples. Also, to facilitate public review, it would be helpful to include definitions of "microgrids" and "district energy systems" in footnote. • Pg. 134 (Policy 7), Include a definition of "biophilic" in a footnote. Please elaborate on how the city would incorporate a "biophilic approach" in city greenspace management planning. • Pg. 135 (Policy 7, Actions 7.1-7.4) do not include any means to measure success. I suggest rephrasing them so that they are clearer and measurable to facilitate implementation and future evaluation. • Pg. 141 - Suggests formatting adjustments to the Urban Tree Canopy and Forest Protection table. • Pg. 141 - Last paragraph, last sentence: it states that "In order to balance between environmental goods, the number of required trees should be less in areas targeted for intense urban growth." To better "balance between environmental goods" in intense urban growth areas, the plan could include a goal to explore opportunities to create green spaces by requiring combinations of solar panels and types of vegetation compatible with dense development, such as green rooftops, terraces with planters, and green walls within and outside of the buildings. • Pg. 143, Action 12.5, Suggest adding this (or similar) action: "Monitor and remove litter on city-owned lands to protect and enhance wildlife habitat" because litter is a problem on some city-owned lands and it contributes to environmental degradation. • Pg. 142, figure 22, caption refers to a "lease weasel". Should this instead be the "least weasel" (Mustela nivalis)? 	<ul style="list-style-type: none"> • The Environment Trends report includes a section on Forests and Tree Canopy and includes a summary of programs and initiatives, statistics, and maps. Although there are many environmental and social benefits to urban greenery, studies and methodology are still evolving to estimate carbon sequestration capacity and effectiveness. More research is needed on the cumulative effects of trees, soils and their management in urban areas when compared to the magnitude of emissions generated by urban transportation and buildings. At this time, the estimates of carbon sequestration are beyond the scope of the Comprehensive Plan. • Re: mowed areas and planting native trees: This is addressed in the Rec and Parks chapter, Policy 11 and Action 11.4. Language could be added to the end of Action 11.5 that includes,<u>"to cut maintenance costs, the impacts of moving, and to maximize environmental benefits."</u> • If the term carbon sequestration ends up in the final plan, a definition can be included. • Pg. 128, Action 3.4 is aspirational and will be further analyzed as these types of systems are requested. They are discussed in further detail in the Trends report. Perhaps for clarity, the action item could be changed to read: <u>"Explore opportunities to partner to develop renewable energy systems, microgrids, energy storage, and district energy systems."</u> • Policy 7, pg. 134, first full paragraph of second column: Biophilic approach is stated in the last sentence. Examples could be added to the sentence to read: <u>"A biophilic approach, connecting people with plants and nature both indoors and outdoors, can be incorporated in city greenspace management planning."</u> • An implementation chapter or chart has been discussed with the planning commission. • Pg. 141 - Staff will make the suggested formatting adjustments to the referred to table. • Pg. 141 - Last paragraph: Staff recommends adding examples to Action 11.1 (pg. 143). For example: "Revise the Forest and Tree Preservation Ordinance to consider context, to find a balance between the number of required trees and city objectives for stormwater management, solar or renewable energy, improved air quality through the reduction of vehicle miles traveled, green building features <u>such as green rooftops, green walls, solar panels</u>, and other important environmental goals. • Pg. 143, suggested added language to Action 12.5: The city already removes litter on city-owned land. This is a programmatic issue that is already on-going. • Pg. 142, figure 22. Edit will be made from "lease" to "least."
37	King Farm Citizens Assembly, Inc. (KFCA)	x		<ul style="list-style-type: none"> • Pg. 134-135, Policy 7 touches upon the idea of community gardens and includes an action item (7.4, pg. 135). The KFCA supports the expansion of community gardens, but would like the plan to also include the "preservation of existing community gardens" as a priority. 	<ul style="list-style-type: none"> • Staff agrees and suggests adding to Action 7.4, pg. 135: <u>Preserve existing</u> and identify <u>new</u> community garden sites on public property, including parks, recreation and senior centers, public easements and rights-of-way, and surplus property.

Exhibit #	Information Source Name and Address	Enviro	Water Res	Summary of Comments	Staff Comments
WATER RESOURCES TESTIMONY					
11	State of Maryland: Department of Planning and Maryland Department of the Environment		x	<ul style="list-style-type: none"> Reference the acronym WSSD at its first use on pg. 147. Pg. 152. Correct an error and update the numbers in the table. Pg. 159. The draft plan includes a proposed amended Growth Tier map (Figure 25, pg. 159), reflecting the City's proposed expanded Maximum Expansion Limit (Map on pg. 224). The State provided several suggestions for refinements (Exhibit 11, pg. 9 of 12) to the Growth Tiers text and map. Pg. 152: Table of Water Demand - As noted by the MD Dept of the Environment, the table's 2040 Avg. Daily Demand of 7.49 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 3-T14), which has the 2040 Avg. Daily Demand of 6.55 MGD. The city should work with the county to reconcile any differences. Pg. 158: Table of Wastewater Demand - The table's 2040 Avg. Daily Flow of 8.54 MGD does not appear to correspond to the most recent County Plan, 2018-2027 Montgomery County Water Supply and Sewerage Systems Plan (Table 4-T16), which has the 2040 Avg. Daily Demand of 7.42 MGD. The city should work with the county to reconcile any differences. The WRE does not directly address the statutory requirement to "identify suitable receiving waters and land areas to meet the storm water management and wastewater treatment and disposal needs of existing and future development proposed in the land use element of the plan" (§3-106. (a)(2) of the Land Use Article). The WRE should discuss this issue. State guidance to address this requirement is for jurisdictions to complete an analysis of more than one land use plan option, focused on forecasted impervious cover changes and forest cover changes by watershed resulting from implementation of different land use plan options. Based on that analysis, the WRE could discuss which land use plan option would be least impactful to receiving waters. 	<ul style="list-style-type: none"> Staff agrees. "WSSD" in parentheses will be added after its reference in the first paragraph on pg. 147. Staff will correct and update the table. 1.51 should be 1.151 (2040 net increase). ADD should be 5.628 for 2040 net increase. <p>Staff met to work through in detail each of the State's comments and recommend the following:</p> <ol style="list-style-type: none"> Within the WRE, reiterate language from the Municipal Growth Element (MGE) stating a priority for annexation for properties that are likely to be fiscally beneficial to the City and for which adequate public facilities (e.g., sewer service) can be provided. This addition could be duplicated text or a shorter cross-reference to the MGE. Reiterate language from the MGE (pg. 231, Policy 8, 1st paragraph) explaining the circumstances and conditions that the city would consider extending new public sewer services, whether or not a property has been annexed into the city or is within the Rockville or Washington Suburban Sanitary Commission (WSSC) service area. Include definitions and expectations in the draft Plan for each of the Sewer Growth Tiers (i.e., Tier I, Tier IIA, Tier IIB). (See staff report for definitions). Revise the Sewer Growth Tier map (Figure 25 on pg. 159) to show which areas within the city's MEL are planned for new City sewer service should they annex into the City, versus those areas in the MEL that the City would consider extending new sewer service under certain circumstances but are not planned to be served. (See Staff Report for map.) <ul style="list-style-type: none"> Pg. 152 - Table of Water Demand: Staff sent updated demand forecast for both water and sewer to Montgomery County on July 25. Montgomery County info was outdated; they now have current Rockville projections, which match the projections included in the 2040 WRE. Expect Montgomery County to include updated information with their annual update. Pg. 158: Table of Wastewater Demand - Staff sent updated demand forecast for both water and sewer to Montgomery County on July 25. Montgomery County info was outdated; they now have current Rockville projections, which match the projections included in the 2040 WRE. Staff believes that the State requirement has been fulfilled. As stated in the Land Use and Urban Design Element of the Plan, the city is largely built-out with few remaining large tracts of developable land other than three golf courses. Redevelopment in Rockville is subject to forest conservation, stormwater management, and sewer regulations that serve to protect water quality and preserve impervious surfaces. Therefore, any redevelopment activity would include more protective stormwater management facilities (than currently developed land) and/or would require maintenance or capacity increases to the sewer system, and in rare instances require removal of septic tanks. This will result in positive impacts to receiving waters. The Comprehensive Plan does not identify the three golf courses as areas for potential future growth, except for a portion of Woodmont Country Club that was previously approved in the Rockville Pike Neighborhood Plan and does not provide a detailed plan for this growth. Any changes to the current land use of these golf courses would require a future concept plan and any potential impacts to receiving waters due to the specific land use plans explored would be investigated through the neighborhood planning process.
31	Rockville Environment Commission, John Becker, Chair		X	<ul style="list-style-type: none"> Policy 13, pg. 169. Currently the action items only reference pesticides, herbicides etc. in backyards and green covered spaces not paved surfaces. -----Add New Action Item 13.4: "Increase public awareness of and alternatives for harmful snow-melt compounds on residential and commercial property paved surfaces. With dramatically changing temperature and precipitation patterns over winters in the Mid-Atlantic area it would be productive to engage/remind the public to use less harmful and more Baysafe products." 	<ul style="list-style-type: none"> Action 12.3, pg. 167 includes a broader list of pollutants, including road salts. Road salts could be modified to read road salts/snow-melt compounds). This action addresses both landscaped and paved surfaces. Additionally, instead of adding a new action 13.4, perhaps Action 13.2 could be reworded and replaced with the following text: "Increase public awareness to improve water quality by reducing fertilizers, herbicides, pesticides, and snow melt compounds and using Bay-friendly alternatives."

Exhibit #	Information Source Name and Address	Enviro	Water Res	Summary of Comments	Staff Comments
14	Kenneth Hoffman 1511 Auburn Avenue, Rockville, MD 20850		x	<ul style="list-style-type: none"> Safe drinking water and appropriate sewage treatment is critical for a healthy population. The local water disasters today relate to broken water mains and sewage lines that require urgent repair and ongoing maintenance. A most prudent approach would be to increasingly treat our environment as though we were living within a desert environment where water use is minimized and as much gray water as possible is used for local area irrigation and non-potable purposes. 	<ul style="list-style-type: none"> In response to treating our environment in Rockville as a desert environment, there are different sets of regulations required for different environmental circumstances. The City self-audits, as required by the Maryland Department of the Environment, to determine water loss and inefficiencies. Further, the City promotes water conservation through meeting its required standards as well as through educational programming.
32	Eric Fulton Bradford Drive Rockville, MD		x	<ul style="list-style-type: none"> If the city ever finds \$60-80 million (maybe under a rock or in our couch cushions), we should invest in upgrades to the water treatment plant. The half-century-old facility is vital to the city's day-to-day survival. And while it operates under capacity - even as our city grows – an investment in a modern facility now will be of great benefit over the next century. 	<ul style="list-style-type: none"> Staff agrees. The city is investing in the planning and programming of upgrades through the water system master plan, which staff plans to initiate in FY2022. However, from previous water system planning efforts, water plant upgrades and modernization projects are on-going. An example is the \$7.8 million Water Treatment Plant Electrical, Roof, and HVAC Upgrades, which is planned for implementation in FY2021.
36	Sarah Salazar Lemay Road, Rockville, MD		x	<ul style="list-style-type: none"> The forested stormwater management area within the Twinbrook Metro station plot needs maintenance. During storm events litter floats in the ephemeral pond that forms there and it may be clogging this area. The comp plan should include, as an action, regular monitoring of stormwater treatment areas and regular trash removal to prevent both damage of the systems and transport of litter downstream within the watershed. In addition, the trees within the Twinbrook Metro stormwater management area are covered in English ivy and other non-native invasive vines. The invasive vines could stress and eventually kill the trees, which could also damage or clog the stormwater treatment infrastructure and would adversely affect our ability to achieve various other goals in the comprehensive plan (e.g., preserve existing trees). The comp plan should include requirements for wetland-appropriate treatments of non-native invasive plants as part of regular maintenance of the city's stormwater management areas. 	<ul style="list-style-type: none"> These issues are addressed in general as part of the stormwater management section and related polices of the WRE. The Stormwater System begins on pg. 160 of the plan and includes policies 10-16 and their applicable action items. For the questions related to improvements and maintenance in specific areas, for example around Twinbrook Metro, these issues may be best addressed as part of that particular planning area. In addition, some of the mentioned area may be owned by WMATA. Action 10.8 addresses agreements with other jurisdictions on matters of stormwater management.

Proposed Amended Sewer Growth Tiers Map (Figure 25 on pg. 159)

