



## PLANNING COMMISSION

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**Wednesday, September 25, 2019**

**7:00 PM**

**Rockville City Hall**

**Mayor and Council Chambers**

**Meeting No. 23-2019**

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. Work Session**
    - A. Work Session 6: Comprehensive Plan, Draft for Planning Commission Public Hearing**
  
  - 2. Commission Items**
    - A. New Business**
  
    - B. Minutes Approval**
      - 1. June 12, 2019 -Meeting No. 17-2019**
  
    - C. FYI/Correspondence**
      - 1. Approval Letter - PLT2020-00584**
-

**2. Panel Report for Rockville Town Center**

**3. 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](http://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](http://www.rockvillemd.gov/VideoOnDemand).

**III. NEW DEVELOPMENT APPLICATIONS**

- For a complete list of all applications on file, visit: [www.rockvillemd.gov/DevelopmentWatch](http://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](http://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 25, 2019
Responsible Staff:	Cynthia Kebba

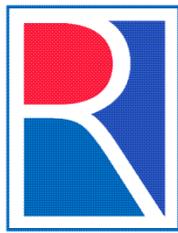
**SUBJECT:**

Work Session 6: Comprehensive Plan, Draft for Planning  
Commission Public Hearing

**RECOMMENDATION**

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

Hold the sixth work session on the Draft Comprehensive Plan



City of  
**Rockville**  
Get Into It

## Planning Commission Staff Report

**MEETING DATE:** September 25, 2019

**REPORT DATE:** September 18, 2019

**RESPONSIBLE STAFF:** Cindy Kebba, Comprehensive  
Planning, 240.314.8233  
ckebba@rockvillemd.gov

**SUBJECT:** Transportation Element and Vision  
& Principles (Introduction pages 1-  
2) of the Draft Comprehensive Plan

### BACKGROUND:

#### Actions to Date

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

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:

<https://www.rockvillemd.gov/203/Rockville2040-Comprehensive-Plan-Update>. All testimony

and transcripts were provided to the Planning Commission as part of the staff report for the first (June 26) work session on the Comprehensive Plan, beginning on P. 137 of that meeting's packet. The testimony included in this packet (for the September 25 work session) includes only the submissions relevant for the Transportation Element and the Vision & Principles (Introduction), consistent with the Planning Commission's June 26 request to provide only the testimony relevant to the subjects of each work session.

The table below shows when each of the elements was reviewed by the Planning Commission. During each meeting, the Planning Commission considered the submitted written and public hearing testimony and instructed staff to make changes to the Draft Plan based on the discussion.

<b>Plan Topics/Elements</b>	<b>Work Session Date</b>
Introduction, Community Facilities, Economic Development, Municipal Growth	June 26, 2019
Housing, Historic Preservation, Recreation & Parks	July 10, 2019
Land Use	July 24, 2019
Land Use	August 7, 2019
Environment, Water Resources	Sept. 11, 2019
Transportation, Vision & Principles (Introduction)	Sept. 25, 2019*

\*Scheduled

### **Summary of Draft Plan Contents**

The Draft Comprehensive 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, Bikeway 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.

### **DISCUSSION:**

This staff report presents testimony received (Attachment A, and summarized below) on the Transportation Element and the Vision & Principles of the Draft Plan. At the September 25 work

session, staff requests direction from the Planning Commission on any revisions the Commission wishes to make.

### **Transportation Element**

#### State of Maryland Department of Planning (Exhibit 11)

The Maryland Department of Planning is pleased to see the Draft Plan's focus on multimodal transportation, integration of land use and transportation planning, and promotion of walking, biking, and transit.

*Testimony:* Referring to the text under Policy 4 on pages 61-62 of the Draft Plan, the State suggests reconsidering the value of studying neighborhood connections to improve accessibility. Such connections would reduce congestion on major roads and indirectly help to make roads friendlier to pedestrians and bicyclists.

*Staff response:* Staff recommends keeping the current plan language. As noted under Policy 4 on page 61, a proposed study of new connections was not included in the Plan, due in part to neighborhood opposition prior to release of the Initial Staff Draft. No additional support for these studies is found in the testimony, with the exception (as discussed below) of one Rockville resident who has requested that the City study realignment of Edmonston Drive at Veirs Mill Road.

*Testimony:* The State suggests that the Draft Plan include language regarding pedestrian and bicycle access consideration in Policies 7 and 8, and associated actions, on page 65.

*Staff response:* Staff recommends no change to the text because Policies 7 and 8 are focused specifically on capacity issues for vehicles and intersection movements. However, the Draft Plan does include policies on Complete Streets, Vision Zero, and a section on pedestrian and bicycle planning and facilities. Enhancing pedestrian mobility and accommodation is one of the major goals of this Plan. Action 17.1 on page 81, recommends development of a pedestrian master plan, with a focus on Rockville Town Center and Metro station areas. In addition, the 2017 Bikeway Master Plan outlines a series of projects that can significantly improve bicycle infrastructure and increase the importance of biking as vital transportation mode.

*Testimony:* The State appreciates the city effort to evaluate the Comprehensive Transportation Review process in Policy 9 on page 67.

*Staff response:* Retain the current language.

*Testimony:* The testimony suggests including an action to explore accommodating and encouraging shared autonomous vehicles in coordination with the State.

*Staff response:* Staff recommends keeping the current plan language. As discussed in the Draft Plan, it is difficult to predict future outcomes from a shift to autonomous vehicles and it is not clear that the use of robot-driven cars will be a benefit over cars driven by persons. However,

Policy 19 states that the city should “monitor and plan for emerging transportation technologies and practices.” Action 19.1 is to monitor these technologies and develop policy recommendations. Action 19.2 mentions consideration of changing parking requirements if shared vehicle use becomes widespread. Rather than actively encouraging use of robotic vehicles at this time, the Draft Plan strongly supports strengthening and enhancing other modes of transport, including walking, biking, and transit.

Environment Commission (Exhibit 31)

*Testimony, page 59, Policy 2 on Vision Zero:* The Environment Commission suggests adding an action to read as follows: “Increase safety outreach to pedestrians through signage and other forms of education.”

*Staff response:* Staff suggests that this action be added under Policy 16: “Make walking and bicycling a convenient and safe option for travel in Rockville.” Including the suggested language under Policy 2, as suggested by the testimony, may inadvertently appear to limit the scope of the Vision Zero planning effort by pointing out one component of Vision Zero, rather than its broader scope.

*Testimony, page 61, Policy 3:* The Environment Commission is opposed to the expansion of I-270 through Rockville due to the many environmental impacts.

*Staff response:* No changes are recommended to the Draft Plan. Policy 3, Actions 3.1 and 3.2 discuss the Plan’s approach to regional traffic congestion and the proposed I-270 project, i.e. to “support solutions.... while protecting Rockville neighborhoods and property” and “monitor and coordinate with SHA regarding any projects to alter I-270 through Rockville.”

*Testimony, page 65, Policy 7:* The Environment Commission suggests new technologies for better timing of traffic signals to smooth traffic flow.

*Staff response:* These new technologies may be considered by Traffic and Transportation staff as one approach to capacity issues under Policy 7; but staff does not recommend the mention of specific technology at this level of detail for the long-term nature of the Comprehensive Plan, especially given that technologies change quickly.

*Testimony, page 77, Policy 15:* The Environment Commission suggests adding an action to include stormwater mitigation, tree canopy/shade as part of improvements to the Twinbrook Metro Station.

*Staff response:* Staff believes that stormwater mitigation will be required under any circumstances, but Action 15.1 could be revised to read: “seek enhancements, such as lighting and tree canopy/shade, to improve personal safety and comfort and to upgrade station aesthetics.”

*Testimony, page 87, Policy 20:* The Environment Commission suggests revising Action 20.3 to include “existing buildings” at the end of the sentence.

*Staff response:* Staff concurs with the testimony and suggested addition (underlined) to the last clause: “. . . including electric charging stations and new building code requirements for electric charging in new construction and existing buildings.”

Washington Metropolitan Area Transit Authority (WMATA - Exhibit 40)

*Testimony:* WMATA supports the Draft Plan’s policies on transportation, transit-oriented development, walkability and re-evaluation of parking requirements.

*Staff response:* No changes are needed.

Two residents of the Hungerford neighborhood (Exhibit 12)

*Testimony:* The residents suggest improving the Hungerford neighborhood’s accessibility to Town Center, the Rockville Metro Station, and Rockville Pike.

*Staff response:* Staff does not recommend changes to the Elements portion of the Draft Plan, as accessibility to these locations is already addressed in the Plan. Action 13.4 calls for pedestrian and bicycle planning for all BRT station locations, which would include the testimony’s request for “pedestrian paths to future transportation (e.g., potential rapid transit stops at Mt. Vernon and Edmonston along Rockville Pike.) The testimony mentions Figure 15 on page 82, and its representation of planned crosstown bike routes, which were adopted as part of the Bicycle Master Plan. Action 18.2 does say the city should work with neighborhood groups on new bike connections, which could include the gaps mentioned in the testimony. Staff believes that it would be worthwhile to include this goal in the discussion of Planning Area 3, which includes the Hungerford neighborhood.

As a point of information, MCDOT’s new on-demand transit service (Ride On Flex) now helps residents, including in the Hungerford neighborhood, order a ride by using a mobile app-based booking, for a fee and during regular service hours, to various destinations, which include Rockville Town Center and the Rockville Metro Station.

Resident interested in planning for Montgomery College (Exhibit 14)

*Testimony:* The resident suggests increasing transportation options to better connect Montgomery College to Town Center, potentially including a circulator bus, a Metro station in the vicinity of North Campus Drive, enhanced bicycle paths and walkways between the college and Town Center, as well as planning for increased use of electric bikes throughout the city.

*Staff response:* Staff does not suggest any changes because these topics are already addressed by the Draft Plan. The Draft Plan supports bus rapid transit along the MD 586 (Veirs Mill Road) and recommends continued work with the county on BRT along MD 355 (Rockville Pike), both of which will serve the college campus.

In addition, Action 12.1, on page 73, calls for collaboration with WMATA and Montgomery County's Ride On bus service to bring increased bus service to Rockville's growth areas, which would include Montgomery College and the Rockville Town Center. Actions 16.1-16.4 promote pedestrian and bicycle improvements throughout the city; Action 18.3 recommends collaboration and working with Montgomery College and MCPS on a new bikeway connection from the college to Rockville Town Center; and Action 19.4 promotes the use of electric bicycles. Furthermore, the Planning Commission has approved creation of a new Planning Area, whose center will be Montgomery College. Language in that Planning Area discussion will include the importance of connections to Town Center and Metro.

Twinbrook Community Association (TCA-Exhibit 26)

*Testimony:* The TCA supports the Draft Plan policies for creative solutions to capacity issues on Veirs Mill Road and MD 355. It also supports Policy 12 page 71 for improving bus service, stops, and shelters, while noting that: "Many of the Ride On stops do not have a shelter, and some are not accessible to individuals with disabilities." The testimony supports BRT and strongly supports a BRT station at Atlantic Avenue and Veirs Mill Road. The testimony mentions a lack of bus routes "within the interior of our community."

The TCA supports transit-oriented development "that can connect the residential side of the tracks to the Pike in a meaningful way, including a pedestrian/bike crossing." It also asks for investments at the Twinbrook Metro Station.

*Staff response:* The testimony supports the policies and actions in the Draft Plan. In addition, the city is currently working on implementation of a federal Enhanced Mobility for Seniors and People with Disabilities grant to improve bus shelters and bus stop accessibility throughout the city. Approximately 20 of the bus stops selected for improvements are located within the Twinbrook neighborhood. The city also installs approximately 6-8 new bus shelters on a bi-annual basis. The shelters are generally installed based on ridership and right-of-way availability, but staff can evaluate installations at specific locations within the Twinbrook neighborhood based on requests from the community.

Action 15.2 on page 77, recommends improvements to pedestrian and bicycle accessibility to the Twinbrook Metro Station.

Action 18.4, on page 83, calls for a study of potential locations for a bicycle and pedestrian facility over or under the CSX track for better connection between Rockville Pike, the Twinbrook Metro Station, and Twinbrook neighborhood. The recently approved Twinbrook Quarter mixed-use development concept plan includes accommodation for a grade-separated bicycle and pedestrian connection over the CSX and Metro tracks that, if implemented, would provide an additional unimpeded and direct connection between Rockville Pike and Twinbrook neighborhoods.

Resident of Woodley Gardens (Exhibit 32)

*Testimony:* The resident supports the Plan’s transportation policies and, specifically, efforts to improve walkability and pedestrian safety, including creating a pedestrian master plan. The resident provides an example of where road design hampers pedestrian safety and requests that the city stop putting trees in medians where they obstruct sight lines.

*Staff response:* The testimony supports Plan policies. Specific recommendations have been forwarded to Traffic & Transportation staff for consideration.

King Farm Resident Council (Exhibit 33) and King Farm Citizens Assembly (Exhibit 37)

*Testimony:* Both organizations strongly object to the Corridor Cities Transitway (CCT) route through King Farm.

*Staff response:* The CCT project is currently on hold and no progress has been made in the design phase beyond the 30% design for several years. The Maryland Transit Authority (MTA) conducted a study in 2011, on request of the City of Rockville, to explore other options to realign the CCT and concluded that no other option “warrants further consideration.” The most recent position taken by the Mayor and Council has been to support the project with the proposed route on King Farm Boulevard, consistent with the annexation agreement that led to the development of King Farm.

*Testimony:* The King Farm Citizens Assembly requests that the Plan advocate for the State Highway Administration (SHA) to study allowing a left-turn movement from westbound Redland Boulevard on to MD 355.

*Staff response:* Staff supports this westbound left-turn movement and recommends that it be added as an action to Policy 8, on page 66. Staff will also continue to advocate for it with SHA.

Resident of Twinbrook (Exhibit 45)

*Testimony:* The resident suggests adding a provision to straighten Edmonston Drive so that it intersects with Veirs Mill Road at a single location instead of the current two locations.

*Staff response:* A proposed study of this intersection had been discussed as part of a larger study of potential new connections prior to the Initial Staff Draft, but a recommendation to study connections was not included in the Draft.

Resident and member of the MD 586 BRT Corridor Advisory Committee (Exhibit 46)

*Testimony:* The resident states general support for BRT on Veirs Mill Road but questions the usefulness “if it’s only expected to increase travel by 15 minutes.” The testimony questions the lack of a dedicated lane along the length of Veirs Mill Road and suggests a reworking of WMATA’s Q routes.

*Staff response:* No change to the Draft Plan is recommended. Staff will continue to work with MCDOT on the Veirs Mill Road BRT project and encourages that Rockville residents also

participate and provide input to the County process, as Rockville residents are also Montgomery County residents.

Historic District Commission (HDC-Exhibit 49)

*Testimony, page 74, Policy 14:* The HDC refers to Policy 14 on page 74, and requests that any part of a redesign or upgrade to the Rockville Station include interpretive materials to illustrate the history and significance of the original Rockville Station, perhaps including an explanation as to why it was relocated due to construction of the Red Line.

*Staff Response:* The original station is preserved about 160 feet south of its original location and includes interpretive signage on the exterior. The building is used for private offices now. Staff agrees that any changes to the station that affect the historic interpretation should also be memorialized through signage and/or other methods.

Montgomery County BRT Team (Exhibit 5)

*Testimony, page 73, Policy 13:* The BRT Team notes that Ride On Extra is a “limited stop” service, not an express service as written. CCT is the Corridor City Transitway, not Capital City Transitway as written.

*Staff response:* Staff will make the corrections.

Rockville Traffic and Transportation Staff Recommendation

Traffic and Transportation staff propose a new action item (7.4) under Policy 7 on page 65. The proposed action would read:

“7.4 Enhance the connectivity of the city’s roadway network by prioritizing and programming the acquisition of needed rights-of-way and the design and construction of the following roadway improvements:

- Dawson Avenue – extend east to Hungerford Drive (MD 355)
- Maryland Avenue – extend north to planned Dawson Avenue, as extended

These extensions are in addition to those described and illustrated in the adopted Rockville Pike Neighborhood Plan, including the extension of Chapman Avenue and the reservation of right-of-way for the future extension of East Jefferson Street.

This staff recommendation is not in response to any testimony, but is intended to ensure that these connections, shown in Figure 11 on page 64, are contained in the Plan to 1) ensure that the city receives the needed dedication, and 2) prevent construction of private improvements in the future right-of-way.

**Vision and Principles**

At the kick-off meeting in 2015 for the Rockville 2040 process to update the Comprehensive Plan, participants were asked to review and comment on the vision and principles statements from the 2002 (current) Comprehensive Master Plan. Since then, input on what is most

important for Rockville’s future was collected during listening sessions, city-wide forums, open houses and other community meetings. That input was incorporated into the Initial Staff Draft that the Planning Commission reviewed in January-February 2019. The review resulted in the current, revised Draft, including the Vision and Principles that are on pages 1 and 2 of the current Draft Plan.

Now that the Planning Commission has reviewed all ten elements, Staff requests that the Commission take a final look at the Draft Plan’s Vision and Principles (pages 1 and 2 of the Introduction), to ensure that they appropriately convey the shared vision for guiding and shaping Rockville over the next 20 years.

The following testimony, that was specific to the Plan Vision and Principles, was received:

State of Maryland Department of Planning (Exhibit 11)

*Testimony:* The State suggests compiling the vision statements for each chapter as part of an Executive Summary.

*Staff Response:* This comment was addressed at the first work session. The Planning Commission agreed that an Executive Summary would be produced after the Planning Areas portion of the Plan is completed so that the Executive Summary would encompass the entire document and help to tie the two parts together and may include the Plan vision and principles, as well as the visions and goals from each element.

Resident interested in planning for Montgomery College (Exhibit 14)

*Testimony:* The resident states that “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.”

*Staff response:* The comment is appreciated.

Rockville Economic Development, Inc. (REDI), (Exhibit 15)

*Testimony:* REDI notes that four of the Draft Plan’s main principles are related to economic development. The testimony stated: “These principles provide guiding principles for the situation the City is aware of and addressing at the current time. However, these principles may need to evolve and change to address continually changing conditions in the City.”

*Staff response:* This testimony was addressed at the first work session that included the Economic Development element. On page 175 of that element, the Plan states “... it is recommended that the policies and actions contained in this element be continuously monitored and that appropriate adjustments be made to ensure that the city considers the most relevant economic development tools for implementing policies.” The Planning Commission agreed that no changes were needed to the Draft Plan to address the testimony.

## **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 <http://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 Economic Development, Inc., Rockville Housing Enterprises, etc.) to obtain their input. The Planning Commission has included Chairs of boards and commissions in work sessions, on various topic areas.

## **NEXT STEPS:**

As of the completion of this work session, the Planning Commission will have reviewed the entire Elements portion of the Draft Comprehensive Plan. Staff will be setting a proposed schedule for the Commission's review of the second portion of the Plan, the Planning Areas. Staff expects to bring a draft to the Planning Commission in November for initial review prior to setting public hearing dates.

## **Attachments**

Attachment 1.A.a: Testimony - Transportation and Vision & Principles (PDF)

# Jim Wasilak

Jim Wasilak, Zoning and Development Manager

9/18/2019

(5)

**Donin, Amy**

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**From:** Gutschick, Scott  
**Sent:** Thursday, March 28, 2019 12:31 PM  
**To:** Donin, Amy  
**Cc:** Gutschick, Scott  
**Subject:** RE: Rockville's Comprehensive Plan Update

Hello Amy,

Concerning page 116 of the draft plan:

- The narrative is factually correct for the most part with the following exceptions:
  - The MCFRS master plan (a.k.a., “Fire, Rescue, Emergency Medical Services and Community Risk Reduction Master Plan”) is not a “facilities” master plan, so that word should be deleted. Suggest that the City use the full/actual title of our master plan the first time it is mentioned.
  - The MCFRS master plan is updated every six (vs. five) years.
  - [Clarification] The MCFRS master plan did not specifically state that Station 3 is “inadequate” but it could be correctly inferred as such.
  - While Action 5.3 (i.e., relocation of Station 3 in or near the City) appears to be the City’s intention, the Rockville Volunteer Fire Department and MCFRS are considering renovation of the existing facility as well as the alternative of relocating the station nearby in a new facility. As available land of sufficient size and of strategic location is typically difficult to find for a fire station in an urban area, on-site renovation of Station 3 must be considered. [BTW, RVFD owns Station 3, but the County would likely fund some of the costs of this project.]
- Suggest that the City’s plan include a map showing the locations of Stations 3, 23, 32 and 33 serving the City. Alternatively, or in addition to the map, the plan could identify the street address of each of these four stations within the narrative to make clear to the reader where these stations are located.
- Suggest that the City’s plan might specify the County’s selected location of the future fire station in the White Flint area (i.e., intersection of Chapman Avenue & Montrose Parkway).

Concerning page 234:

- 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence under “Impacts of Projected Growth,” the narrative should say “fire and emergency **medical services.**”
- Same comment for 3<sup>rd</sup> paragraph, 1<sup>st</sup> sentence under the “Policy 12” heading.

Thanks for the opportunity to provide comment. Hopefully my comments did not get too far into the weeds.

*Scott A. Gutschick*  
 Manager, Planning and Accreditation Section  
 Montgomery County Fire & Rescue Service

*Public Safety Headquarters*  
 100 Edison Park Drive, Floor 2, Room E-09  
 Gaithersburg, MD 20878

240-777-2417 (office)  
 240-429-0154 (cell)

**Donin, Amy**

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**From:** Buckley, Darcy B.  
**Sent:** Friday, March 29, 2019 9:42 AM  
**To:** Donin, Amy  
**Subject:** RE: Rockville's Comprehensive Plan

Hi Amy,

Just a couple of comments from the BRT team:

- Page 73 - Policy 13 -
  - Ride On Extra is a "limited-stop" service not an express service as written.
  - CCT is the Corridor City Transitway (not Capital City Transitway as written)

Thanks!

**Darcy Buckley**  
ph. (240) 777-7166  
[darcy.buckley@montgomerycountymd.gov](mailto:darcy.buckley@montgomerycountymd.gov)

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Cynthia Kebba

From: noreply@civicplus.com
Sent: Tuesday, April 30, 2019 7:56 PM
To: Comprehensive Plan
Subject: Online Form Submittal: Rockville 2040 Public Testimony

If you are having problems viewing this HTML email, click to view a Text version.

Rockville 2040 Public Testimony

The Planning Commission needs your input!

You may provide testimony to the Planning Commission on the draft Rockville Comprehensive Plan through this online form, in addition to any email or physical mail testimony you submit directly to the Planning Commission.

All submitted testimony is considered an item of public record and will be included in the Planning Commission testimony report for the draft Comprehensive Plan.

Which Plan element(s) is your testimony about?

- Land Use and Urban Design
Transportation
Recreation and Parks
Community Facilities
Environment
Water Resources
Economic Development
Housing
Historic Preservation
Municipal Growth
Other

Name (required):\*

Mary Grace Sabol

Address of Residence (recommended):

210 Blandford Street

Email Address (recommended):

marygracesabol@yahoo.com

By including your Address of Residence or Business and/or Email Address, you are expressing your willingness for staff to contact you for clarification or for legal notifications related to the Comprehensive Plan.

Please type your testimony in the field below:\*

We love a game called soccer darts! Let's have it available for pop-up play at events/festivals. We could use more fenced space for dog runs off leash. We would like the piece of Elwood Smith Park that borders Fleet Street to be better maintained ongoing. Lots of non-native vines have taken over, and there are layers of trash mixed in the under story. There are two really cool looking, vintage poolside chairs by Cabin John Creek, if anyone wants to get them. Honestly, we think that if it could be agreed upon with the Casey Foundation, it would be nice to connect the dead end of Blandford Street with Fleet Street by building a woods-friendly ramp that people could use instead of trespassing behind the office building at Fleet and Monroe. Water drainage could use a redesign on the steps descending from Metro pedestrian bridge down to Monroe Street. We love our Rec and Parks City of Rockville staff! Re: Transportation Crosswalk signal at Fleet and Monroe is somewhat dangerous for pedestrians. Cars speed and turn without checking crosswalk. Maybe some traffic-calming measures (even temporary around school start dates) would help. General comment: I'd like to see us have some kind of architectural or sculptural element on 355 that lets people know they are entering Rockville. I don't like how we just bleed together with towns north and south of us. Maybe recreate the milestones from the days when people were driving herds to and from Georgetown would be a nice historical touch. We love our Planning and Development staff!

\* indicates required fields.

View any uploaded files by [signing in](#) and then proceeding to the link below:  
<http://rockvillemd.gov/Admin/FormHistory.aspx?SID=7>

The following form was submitted via your website: Rockville 2040 Public Testimony

Rockville 2040 image:

Which Plan element(s) is your testimony about?: Transportation, Recreation and Parks

Name (required):: Mary Grace Sabol

Address of Residence (recommended):: 210 Blandford Street

Email Address (recommended):: marygracesabol@yahoo.com

Please type your testimony in the field below:: We love a game called soccer darts! Let's have it available for pop-up play at events/festivals.

We could use more fenced space for dog runs off leash.

We would like the piece of Elwood Smith Park that borders Fleet Street to be better maintained ongoing. Lots of non-native vines have taken over, and there are layers of trash mixed in the under story. There are two really cool looking, vintage poolside chairs by Cabin John Creek, if anyone wants to get them.

Honestly, we think that if it could be agreed upon with the Casey Foundation, it would be nice to connect the dead end of Blandford Street with Fleet Street by building a woods-friendly ramp that people could use instead of trespassing behind the office building at Fleet and Monroe.

Water drainage could use a redesign on the steps descending from Metro pedestrian bridge down to Monroe Street.

We love our Rec and Parks City of Rockville staff!

Re: Transportation

Crosswalk signal at Fleet and Monroe is somewhat dangerous for pedestrians. Cars speed and turn without checking crosswalk. Maybe some traffic-calming measures (even temporary around school start dates) would help.

General comment:

I'd like to see us have some kind of architectural or sculptural element on 355 that lets people know they are entering Rockville. I don't like how we just bleed together with towns north and south of us.

Maybe recreate the milestones from the days when people were driving herds to and from Georgetown would be a nice historical touch.

We love our Planning and Development staff!

Additional Information:

Form submitted on: 4/30/2019 7:55:35 PM

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MARYLAND DEPARTMENT OF



PLANNING

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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

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**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.

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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 <b>MUST</b> 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 <b>MAY</b> 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 <b>SHALL</b> 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

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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

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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.

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- 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.

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- 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

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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

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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.

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- 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

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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](mailto:chuck.boyd@maryland.gov).

END MARYLAND DEPARTMENT OF PLANNING COMMENTS

2018 City of Rockville Comprehensive Plan Amendment: N. Stonestreet Avenue  
Maryland Department of Planning Comments

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

**STATE AGENCY COMMENTS**

The following pages contain comments from other State agencies in support of the Maryland Department of Planning (Planning) review of the **draft 2040 City of Rockville Comprehensive Master Plan Update** as part of the standard 60-day review period for municipalities and non-charter counties. Comments not included here may be submitted under separate cover, or via the State Clearinghouse. If comments from other agencies are received by Planning, they will be forwarded to the County in a timely manner.

Attachments

Page 13	Maryland Department of Housing & Community Development
Page 14	Maryland Department of Commerce
Page 16	Maryland Department of the Environment
Page 18	Maryland Historical Trust (letter dated October 18, 2018)



LARRY HOGAN  
*Governor*

BOYD K. RUTHERFORD  
*Lt. Governor*

KENNETH C. HOLT  
*Secretary*

TONY REED  
*Deputy Secretary*

May 3, 2019

Mr. Joseph Griffiths  
Manager of Local Assistance and Training  
Maryland Department of Planning  
301 West Preston Street, 11<sup>th</sup> floor  
Baltimore, MD 21201

Dear Mr. Griffiths:

Thank you for the opportunity to review the City of Rockville draft Comprehensive Plan (the Plan). The comments below are based on a review of the plan by staff in the Maryland Department of Housing and Community Development (DHCD) Division of Neighborhood Revitalization.

The plan's focus on development near transit is consistent with DHCD priorities and financing programs. Housing affordability is also identified as a concern in the Plan, however there is no discussion in the plan of potential State of Maryland financing programs to assist. DHCD staff are available to discuss the full range of financing tools, as well as potential resources for specific development opportunities. The Department administers programs that can support housing for a range of incomes, as well as mixed use and business development that can help implement the Plan's objectives.

Again, thank you for the opportunity to comment on the Plan. If you have any questions regarding our comments, please call me at 410-209-5807.

Sincerely,

John Papagni  
Program Officer  
Division of Neighborhood Revitalization

Cc: Chuck Boyd, MDP  
Oumy Kande, MDP



MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
2 N. Charles St. • Baltimore, MD 21201 • dhcd.maryland.gov  
410-509-5800 • 1-800-756-0119 • TTY/RELAY 711 or 1-800-735-2258





Larry Hogan | Governor  
 Boyd Rutherford | Lt. Governor  
 Kelly M. Schulz | Secretary of Commerce  
 Benjamin H. Wu | Deputy Secretary of Commerce

March 21, 2019

Charles Boyd, AICP  
 Maryland Department of Planning  
 301 West Preston Street  
 Suite 1101  
 Baltimore, MD 21201

RE: Local Plan Review: City of Rockville - Draft for Planning Commission Public Hearing

Dear Mr. Boyd:

The Maryland Department of Commerce has reviewed the March 2019 Planning Commission Public hearing draft of the City of Rockville's 2019 Comprehensive Plan, and finds that it is consistent with the Maryland Economic Development Commission's 2016 five-year Strategic Plan, **Best is the Standard**. The Department of Commerce's 2016 strategic plan has the following goals:

- Goal 1: Achieve Operational Excellence
- Goal 2: Foster a Competitive Business Environment
- Goal 3: Advance Innovation and Entrepreneurship
- Goal 4: Expand Targeted Industry Clusters
- Goal 5: Create One Maryland and Enhance Community Development
- Goal 6: Improve Brand and Talent Attraction

Of these goals, four (Goal 2, Goal 3, Goal 4, and Goal 6) are relevant to the City of Rockville's 2019 Draft Comprehensive Plan. This draft is consistent with these goals.

**Goal 2: Foster a Competitive Business Environment.** The City's draft comprehensive plan contains an Economic Development element that sets out a goal to "Promote a positive business climate that supports local and small businesses" (Goal 2). This goal sets forth policies intended to "foster a positive business climate that supports business startups, retention, expansion, and the attraction of innovative and diverse industries (Policy 5) and "celebrate a culture of entrepreneurship and small business ownership to help retain existing small and local businesses as they grow and foster new opportunities." (Policy 6). The City also recognizes that there are development pressures that can cause industrial and commercial land to be lost to residential development, and has set forth a policy to "preserve light and service industrial land and uses to ensure that productive businesses thrive and provide employment and services to area residents (Policy 8).

**Goal 3: Advance Innovation and Entrepreneurship.** Policy 5 of the elements second goal sets forth actions that support innovation and entrepreneurship within the municipality. Action 5.3 states that the City will “ensure that policies are in place to facilitate small business incubator space, pilot project testing, and industry-specific infrastructure.” Policy 6 of this element sets forth actions that will “celebrate a culture of entrepreneurship and small business ownership to help retain existing small and local businesses as they grow and foster new opportunities,” including the encouragement of links to create an active entrepreneurial infrastructure in the City.

**Goal 4: Expand Targeted Industry Clusters.** The draft plan recognizes that Rockville is an important location for various companies that are members of the State’s target industry clusters. Goal 1, “Capitalizing on Competitive Advantages,” sets forth Policy 2, “Actively support Rockville as a center for innovative technologies, life sciences, advanced research, and cybersecurity.”

**Goal 6: Improve Brand and Talent Attraction.** The overall plan recognizes that liveable places are important factors in attracting and retaining the workforce that Maryland needs to be successful. It supports tourism and historic preservation, recreational amenities, affordable housing, and effective transportation systems.

For these reasons, the Department of Commerce finds that the March 2019 Planning Commission Public hearing draft of the City of Rockville’s 2019 Comprehensive Plan is consistent with the goals of the Maryland Economic Development Commission and the Department of Commerce.

Sincerely,



James Palma, AICP  
Maryland Department of Commerce

## 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.



Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Robert S. McCord, Secretary  
Sandy Schrader, Deputy Secretary

April 11, 2019

Mr. Charles W. Boyd, AICP  
Director of Planning Coordination  
Maryland Department of Planning  
301 W. Preston Street  
Baltimore, MD 21201

Dear Mr. Boyd:

Thank you for the opportunity to review the March 2019 Comprehensive Plan of the City of Rockville Draft for Planning Commission Public Hearing and submit comments on behalf of the Maryland Historical Trust. Overall, we are pleased to see that despite the tremendous recent pattern of robust growth, the City values its historic and cultural assets and has included historic preservation as part of its plan goals as a separate element. The well-illustrated element reflects a strong public desire for historic preservation, and the hard work that the City has done since the 2002 comprehensive plan. Specific comments are outlined below.

p.3 The importance of preservation and its context is clearly stated in the community vision purpose in the introduction.

p.3 Also states that Rockville was added by amendment to the Montgomery County Heritage Area.

p.16 Attention and acknowledgement to existing neighborhoods is reflected in the goals for the land use plan.

p.16 Also references the City's 230-year development history and patterns of development.

p.205 The stated vision is clear and concise.

p.206 The three stated goals are attainable, logical and concise. We commend the City for recognizing the importance of the Certified Local Government program, and appreciate the acknowledgement of our partnership efforts.

p.211 Second paragraph. Spell out Historic District Commission for greater clarity leading off this section.

p.213 In the explanation of Policy 2, it seems clear that there are unintended consequences of the zoning ordinance provision for historic significance evaluations regarding permit applications. We agree that the City supports a more focused approach to create new and expand existing historic districts, and support the actions that will achieve that desire.

p.213 In the paragraph that explains Policy 3, the following sentence is confusing: "At the same time, the continued preservation of some designated properties may not always be financially feasible". Please clarify or explain the intent of this statement.

p.217 If the City would like help instituting a local tax credit program, contact the Maryland Historical Trust for technical assistance and guidance.

p.217 To facilitate the actions expressed under Goal 3 – Education and Partners in Preservation, contact the Maryland Historical Trust or the Maryland Association of Historic District Commissions to inquire about our "MHT Roadshow" and other training programs and education opportunities.

Thank you again for the opportunity to comment on the March 2019 Comprehensive Plan of the City of Rockville Draft for Planning Commission Public Hearing. If you have any questions, please contact me at (410) 697-9561 or [steven.allan@maryland.gov](mailto:steven.allan@maryland.gov)

Sincerely,



Steven H. Allan, AICP  
Local Assistance and Training Planner  
Office of Planning, Education and Outreach

Cc Nell Ziehl, Chief, Office of Planning, Education and Outreach  
Oumy Kande, MDP

12

From: ~~\_\_\_\_\_~~  
 Sent: Friday, May 17, 2019 11:37:01 AM  
 To: Planning Commission  
 Subject: Testimony on the Draft Comprehensive Plan 2040

Dear Planning Commission,

My wife and I are homeowners in Hungerford (15 Bowie Ct.), the third largest Rockville community by census tract (est. 5,836 (2016)). Many residents retain 2-3 cars per household and only occasionally walk or bike to city center, Metro, or businesses within just .25 miles from the community. While the community has excellent access to parks and most businesses and services are only short distance away, the community's walkability/bike access is restricted due to the lack of direct routes to the city center, the Rockville metro, and businesses along the west side of Rockville Pike.

The comments below are in response to the PDF version of the draft 2040 plan:

#### Hungerford Accessibility to Town Center and Metro

- The planned crosstown bike route (electronic page 45, Figure 15) does not include a potential route along Monroe St. south of the city center or a connection between the existing bike route around Fleet St. to the proposed route along Rockville Pike to the Metro. This is a viable pathway for residents seeking to bike to the metro or the eastern part of the city center. As of now, available sidewalks are minimum width and directly adjacent to heavy traffic. Available roadways are dense with parked cars and both county and school bus traffic.
- The business zoning in the triangle between Monroe, Fleet St., and Rockville Pike (ep. 12, figure 2) has limited, direct access to the Metro even though it's less than a quarter mile away. As a result, the area is not as desirable as it could be and a number of units at this location have long been available for lease. If the intent is to create a sustainable Office Residential Retail Mix in this area (ep.19, figure 4), the walkability to the metro needs to be considered.
  - **Recommendation:** Consider expanding the Citywide Walkable Community Node Concept (ep. 23, Figure 6) to include the area immediately south of Rockville Metro. New pedestrian and/or bike paths to accommodate bike traffic/Bikeshare could increase walkability between city center/Metro to communities and businesses south of the metro to Fleet St. as well as East/Southeast of Rockville Pike.
- According to the existing land use map for Rockville Station (ep.12, figure 2), Richard Montgomery students and Hungerford residents are trespassing by walking through the private parking lot and juror parking (east of Monroe St/south of E. Jefferson) on a daily basis to reach school, city center, or Metro.
  - **Recommendation:** Develop a draft plan based on the proposed land use plan (ep. 19, figure 4) to purchase private property at and convert this space into new recreational/park space with continued access for the farmer's market to connect new residents in the city center (north) and Hungerford (south). Juror parking could be consolidated at nearby parking garages. Allow for pedestrian access through the proposed park to Richard Montgomery High School and connect the existing pedestrian path to the Elwood Smith Community Center.

#### Hungerford Walkability to Rockville Pike

- As suggested by the Citywide Walkable Community Node Concept (ep. 23, Figure 6), Hungerford's connection with existing businesses along Rockville Pike is limited. There are few gathering places or pedestrian paths to future transportation (e.g. potential rapid transit stops at Mt. Vernon and Edmonston along Rockville Pike). Residents usually bypass this plaza when travelling by car to circle around to access the Wintergreen Plaza parking lot or other businesses along Rockville Pike.
  - **Recommendation:** Expand upon the Hungerford Retail Node (ep. 23, Figure 6) to connect Hungerford via a pedestrian crosswalk to the Wintergreen Plaza (grocery, restaurants) that also considers potential stops for the proposed bus rapid transit. Consider incentives to car dealerships (DARCARS Chrysler and Ourisman Honda) to relocate that would allow for the expansion of the proposed Residential Attached development (ep.19, figure 4) between Mt. Vernon Pl. and Ritchie Parkway and additional mixed use residential/business along Rockville Pike within easy access of schools, public transportation, and the city center.

Sincerely,

Parke Nicholson and Rebecca Merritt  
Rockville, MD

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.

## REDI Board Comments to Rockville 2040 Comprehensive Plan Draft

### REDI Board Executive Summary Points:

- **The REDI Board considers flexibility to be a top priority for the *Plan*.** Flexibility is essential to the future vitality of the City of Rockville, and is a critical advantage to respond effectively to market shifts.
- **The main concern of employers is to attract and retain talent.** The *Plan* must reflect goals that support this critical requirement. For the *Plan* to truly assist employers, create economic advantage, and improve the amenities for the City's residents, talent attraction has to be a central goal within the *Plan*.
- **Economically vibrant municipalities are investing in connectivity.** Having separate, thriving areas is no longer sufficient. Connection, including blending different types of development in innovative ways, will be critical to the success of the *Plan*.
- **Continuous review of the *Plan* is essential.** The REDI Board believes the stated commitment in the *Plan* to review it on a two year schedule is an important improvement in this *Plan*. We urge you to engage employers in this process, and continually update the *Plan* to reflect the perspectives shared in order to keep the *Plan* relevant and ensure the City's competitiveness.

### Board Review Comments and Recommendations:

The work group for the REDI Board reviewed the *Comprehensive Plan of the City of Rockville, Maryland* draft of March, 2019 thoroughly. In reviewing the document, the work group hosted a meeting with the City's planners and associated City staff to provide feedback on the economic development chapter which is a new addition to this *Comprehensive Plan*. The work group members' comments were incorporated into the previous draft chapter and the work group is satisfied that their input was considered and incorporated.

At this juncture, there is a complete *Plan* available for review by interested groups. The work group has again reviewed the *Plan* and provides the following feedback for the Board's consideration:

The work group would ask that the Board commend the City and its staff for conducting an inclusive process and being available for consultation with the REDI Board work group to provide feedback and suggestions for changes throughout the process. Further, the work group commends the City for having a chapter on economic development, a new addition to the *Plan*. The addition of the economic development chapter is a big step forward.

In the *Introduction*, the City provides the main principles for the *Plan*. The work group noted that these principles include four principles related to economic development:

- a. Steer its most-dense development to mixed-use, transit-served locations,
- b. Create the condition necessary for equitable economic growth and opportunities,
- c. Support employment and businesses in a thriving local economy tied to the broader metropolitan region and,

d. Foster a vibrant and successful downtown and growing activity centers.

These principles provide guiding principles for the situation the City is aware of and addressing at the current time. However, these principles may need to evolve and change to address continually changing conditions in the City. For example, dense development may become an option in areas other than transit-served, but an important opportunity for the City. The current data on how individuals commute to work among Rockville residents states that currently, 63.8% of the residents drive alone. At the current time, only 18% rely on public transit. While changes in the form of commuting may occur, the data demonstrate that being flexible and being amenable to alternative development opportunities that may or may not be transit-served need to be an option.

The work group recommends emphasizing to the City the need to maintain flexibility and be amenable to changes in the *Plan* and its goals as economic conditions change and new opportunities arise in the future. Further, to support employment, the City will need to support employers and developers, who make employment opportunities in the City. Having a formalized mechanism to obtain and act on employer feedback, and addressing their needs systematically, will be a critical component of successful economic planning going forward.

The work group noted that the purpose statement in the *Plan* (page 3) the primary stated focus for the *Plan* was to address the community's needs and set the City's policies. The *Plan* should also recognize that employers are members of the community and have an equal stake in the future of the City. The *Plan* does not define who is included in the definition of the community, and it would be beneficial to include employers as community members since the current tenor of the *Plan* suggests communities, e.g., local residents, are the primary audience, rather than having a more inclusive definition that would include employers.

The REDI Board work group is also keenly aware of the changing demographics in the City. The changes will impact the ethnicity, age, and other characteristics of the current population. Therefore, the work group recommends that the City consider what these changes will mean in future planning and to include reviewing the changing demographics over the life of the *Plan* to ensure it remains relevant to the current and future residents and business owners in the City. Having a regular analysis period to review the demographics, changes in use of City-related amenities, and employer needs at specific junctures throughout the life of the *Plan* is highly recommended.

In the economic development chapter, there needs to be a statement that this planning document was developed at a point and time, and the City must remain nimble enough to adapt to market changes, and new, currently unanticipated opportunities as they arise. The *Plan* is not set in stone, and we must have the ability to pivot in order to continually position the City for the change and growth that is appropriate and that enhances economic sustainability.

Also, there are many planning areas in the City, and it is important to address connectivity between the areas from land use, transportation, and aesthetic points of view. Transitions, and the experience of moving around the City, is important to the sense of place that creates the environment where residents, businesses, and visitors want to be.

It is also important to emphasize the importance to Rockville of interactivity between community segments as well as cultural engagement. Currently, the *Plan* refers to residential areas as separate and

distinct from areas for development and economic density. These areas will continually “blend” over time as need for transit and walkability continue to expand. The REDI Board recommends creating linkages of neighborhoods and economic centers to a greater extent than is currently provided in the *Plan*.

We commend the City for having a policy (Policy 6) that anticipates land use changes. We anticipate that there will continue to be new residential, mixed-use projects that will convert current land uses to new uses over the life of the *Plan*. Balancing the needs of the developers and the neighborhoods will be key to future success and ensuring both the quality of life and economic vitality of the City.

The REDI Board is appreciative of the inclusion of Policy 9, which allows for residential attached and mixed use development in East Rockville. We would encourage the City to remain open to developments both in the immediate station area, and in the future, for example, in close proximity to the Bus Rapid Transit (BRT) lines. As transportation opportunities evolve, so too much the City’s policies on mixed use development in order to retain and enhance the City’s economic vitality.

The REDI Board commends the City for policies 11, 12, and 13 which are intended to address the walkability of the existing and new neighborhoods and reduce carbon emissions. The Board is very much in favor of walkability and enhancing the use of the Rockville Metro Station. At the same time, Policy 13 states that the intent is to retain existing neighborhood retail uses. We suggest that the intent would be to retain the neighborhood access to amenities, which are more diverse than just retail uses. As more interactive experiences become the preferred by many residents, and the residents turn over with newer families, the City will need to consider whether retail, or other types of economic and civic amenities are needed. Maintenance is not a forward-looking approach and we encourage the City to consider how to be forward thinking while retaining the neighborhood identity which this policy appears to be addressing. The issue of the type of business arises many times in the draft *Plan*, for example, Policy 18, Rockville Pike and retail, Policy 19, town center, and Policy 20 regarding support of retail in Rockville’s commercial corridors. The actions mentioned, which are of importance to business owners, are appreciated. The REDI Board also suggests expanding the types of usages to reflect Policy 19, which includes retail, business, and entertainment. The greater the options, the more likely the policies are to attract and retain the diverse businesses of today and tomorrow, which this *Plan* cannot anticipate but needs to allow for in the future.

The REDI Board appreciates the forward-thinking that is illustrated in Policy 23, which calls for flexible zoning regulatory and approval procedures for major projects. Potential investors face many hurdles, Policy 23 is an example of the type of policy that can be pointed to as a reason to invest in Rockville.

In the chapter on economic development, chapter 7, the City’s policies are supportive of economic development and partnering with public and private employers and developers. We would recommend including REDI in the process to achieve Policy 1, which focuses on a marketing plan. The marketing of Rockville is something REDI does, as does the Chamber, and would welcome the opportunity to help the City achieve this goal.

REDI supports the second policy in chapter 7 that seeks to solidify and further the City’s presence as a center of innovative technologies, life sciences, advanced research, and cybersecurity. We anticipate that the employers in these areas will continue to evolve and new employers will enter the landscape. The City should also acknowledge the important contribution that non-profits make to our economy as a

business sector, as well as the growth and focus on arts and cultural opportunities and institutions. We encourage the City to consider expanding this policy to leave open the possibility of alternative industries, including creative industries, and alternative employers over the course of the *Plan's* life cycle.

The REDI Board believes that in order to maintain and compete for shoppers on Rockville Pike, the City will need to actively plan for the future and work with collaboratively employers and developers to enhance and innovate in this area. The Pike is currently a car-oriented area and not highly walkable other than within the shopping centers. Continuing to consider mixed-use building, transportation options, and walkability will be key to the continued success and competitiveness of this shopping corridor.

The REDI Board notes that Policy 14 focuses primarily on government contractors, office employers, and federal agencies as key employers to attract and maintain in the City. The Board is supportive of this policy and in addition, believes that other employers should be considered as future opportunities for the City to pursue. The employers mentioned are the current, dominant employers. However, in the future, as industries change, and government offices and agencies consolidate, attracting other types of employers will need to be considered. One of REDI's core strengths is helping the City identify target industries. Including REDI in determining the future employers to attract to the City will be important to ensuring that all types of potential employers, including those that cannot be foreseen today, are considered.

The City has developed a plan that covers the major initiatives of importance to Rockville today and as a means to plan for the future. The REDI Board encourages the City to continue to identify policies and revise current procedures to support economic development and balance the needs of residents with incoming development and other stakeholders dedicated to the economic sustainability of the City. Continuing to be amenable to new developments, industry partners, and new, currently unforeseen partners, will be critical to ensuring the future success of the City. REDI stands "at the ready" to continue to partner with the City to attract and retain high quality businesses to enhance and expand the City's economic vitality.

Thank you for this opportunity to provide our feedback on the draft *Comprehensive Plan of the City of Rockville, Maryland*.

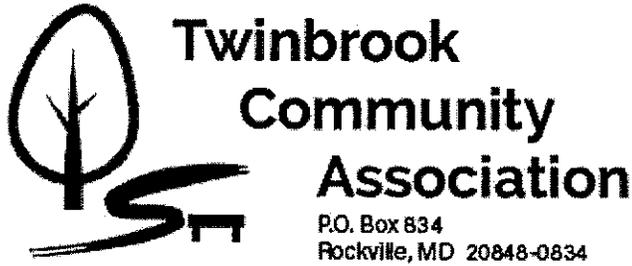


Exhibit (26)

## Testimony on the Draft Comprehensive Plan for Planning Commission Public Hearing

The Twinbrook Community Association thanks you for this opportunity to provide initial feedback to the Planning Commission on the Draft Master Comprehensive Plan for the City of Rockville. This is another positive step forward in a long-range plan to develop our beloved City, and we are grateful for this opportunity to provide feedback. We will continue to testify and submit comments as appropriate as this process moves along.

### I. Land Use, Housing, and Economic Development

We applaud the inclusion of the Twinbrook Metro Station area and the Veirs Mill Corridor in the Land Use Policy map, to ensure that Twinbrook residents have access to flexible zoning arrangements that allow for growth and housing options.

We also encourage the development of policy that allows access to the development of ADUs within the Twinbrook neighborhood if a homeowner desires one. ADUs, short term rentals, and diverse housing options will ensure that our children and our children's' children can live in the City that we love.

The area around the Twinbrook Metro is an important one to our community. It connects us to the retail and services provided along Rockville Pike. We applaud transit oriented development that can connect the residential side of the tracks to the Pike in a meaningful way, including a pedestrian/bike crossing. This will also fulfill our shared goal of a truly walkable City.

### II. Transportation

Transportation is a vital issue to Twinbrook. We have a Metro station, a multitude of highly utilized bus lines that run through the center of our neighborhood, and major roads such as Veirs Mill and Rockville Pike. To the north, we are bounded by the Major Collector of Baltimore Road. Veirs Mill bisects our community under the purview of the SHA as a Major Arterial, and we are bounded to the south by another Major Arterial, Rockville Pike. We are bounded to the east by the Minor Arterial of Twinbrook Parkway, and to the west by the Major Arterial of First Street. Many of our interior streets such as Edmonston and Ardennes are noted as Major and Minor collectors.

We agree that creative solutions should be sought to address the capacity issues of our major arterials. Too often, Veirs Mill, Twinbrook Parkway, and Rockville Pike are backed up considerably simply due to capacity.

We also support the City codifying support for our public transit services, as many of our residents depend on them to get to work and around the City and County.

We strongly support the improvement of bus routes, stops, and shelters in Twinbrook. Many of the Ride On stops do not have a shelter, and some are not accessible to individuals with disabilities. This should be addressed. We also have a lack of bus routes within the interior of our community, and zero MetroBus routes that service Twinbrook Metro Station. We also only have two routes that service our neighborhood - the 44 and 45 Ride On routes. This should be increased.

We look forward to the possibilities that the BRT will bring for innovation, economic development, and easing traffic congestion. We strongly support a BRT hub at Atlantic Avenue. However, we need to invest as much resources into the Twinbrook Metro station as are planned at the Rockville Metro station. An esthetic redesign, incorporating local artists and native plants, should be encouraged.

**III. Recreation and Parks**

We are lucky to have access to our namesake brooks, parks, and recreation centers. TCRC is much beloved by many. We however would encourage an investment in the Rockcrest Community Center, to have it serve as a similar location for community meetings, programs, and sports.

**IV. Community Facilities**

Twinbrook spans two MCPS clusters: Richard Montgomery HS to the south of Veirs Mill, and Rockville HS to the north of Veirs Mill. Two MCPS schools reside in Twinbrook: Twinbrook ES and Meadow Hall ES. We encourage investment in the infrastructure needs of both schools, with the goal to bring both schools into a “green” rating across the board.

**V. Historic Preservation**

Preserving history in Rockville should mean more than simply keeping the look of a neighborhood as it was in a bygone era. It should also include acknowledging and preserving the historic nature of a given community, using signs and other means to convey a story from history.

Twinbrook has a rich history, and the founding of Twin-Brook along with the naming of streets within the development to honor World War II battles and important individuals is well worth acknowledging. We urge the inclusion of signage in Twinbrook and throughout the City to mark the history of a given community or neighborhood.

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 Vyanis, 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 neighborhoods. This can be done through infrastructure improvements in existing neighborhoods and smart planning into new large development projects. Recommend changing the language to " <b>Enhance the walkability of neighborhoods</b> ".
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 - " <b>Rockville is committed to maintaining or increasing green space available for public use.</b> "
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.

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 stops 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 dig 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 acres), 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, heat island 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.

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 - <b>"Include stormwater mitigation, tree canopy/shade as part of these improvements. Shade could be provided by trees or solar canopies."</b>
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 <b>"or existing buildings"</b> to end of sentence.  "...and new building code requirements for electric charging in new construction <b>or existing buildings."</b>
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 set 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.

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.	<b>Add Action 1.6 - "Every policy or development project include an environmental consideration of the long term implications to the environment."</b>
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 revise: "... <b>City of Rockville shall lead by example.</b>
26	125	Environment		1	1.3	"lead by example..."	
27	126	Environment	2		new		<b>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."</b> add: "including City of Rockville..."
28	126	Environment		2	2.1	"Promote and support..."	
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. This 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. This 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 <b>RELATIVE</b> 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 <b>ADAPT TO CHANGES</b> (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.

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 retrofitted 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 Master 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 this 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."

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 the increased greenery offsets the reduced tree cover in these areas. Captured on 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 the 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 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 Bay-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 paths 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 more 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 meet LEED, Energy Star, or similar certification standards for energy efficiency and sustainability."

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, <b>plant-based fresh food...</b> "

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.

Exhibit 33

**Ingleside at King Farm Resident Council**  
**701 King Farm Blvd., Rockville, MD 20850**  
**June 11, 2019**

The latest draft of the Rockville 2040 Comprehensive Plan notes support of the Corridor Cities Transitway – the CCT - (Action 13.3, Policy 13, p73). This is disturbing news to Ingleside at King Farm Residents. The CCT, in spite of what is stated in the Plan, is no longer “. . . a central component to the development of King Farm.” Time has passed it by. We strongly object to the CCT using King Farm Blvd.

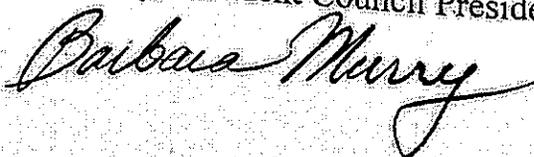
You will recall that King Farm was developed over 22 years ago. This community was designed to be a walking community with easy access to the Community resources for all residents regardless of their limitations. The proposed CCT route would cut the community in half and limit access to our Community facilities and present unnecessary hardships on residents.

Further, when the CCT was first proposed in 1970, there was no King Farm development, only farmland. There was no Ride-On bus service. In the intervening years the need for the proposed CCT route vanished, being replaced by more practical routes to reach Upper County residents. Further, each proposed CCT stop is now served more efficiently by Ride-On buses. In all but one route, Ride-On reaches the Shady Grove metro faster than the proposed CCT bus. The CCT in its present form has been bypassed by events and does not meet the Community needs when first proposed in 1970.

We were assured by the County Executive and the Rockville City Mayor that the CCT would not go through King Farm and that there was a much more practical, more flexible and less costly plan using Shady Grove Road. Therefore we are in support of proposals by the County Executive to re-route the CCT onto Shady Grove Road which will support greater economic development in the north end of Rockville and further up the County. These proposals are more economically sound and far more environmentally consistent with community goals.

Thank you for the opportunity to comment on the Comprehensive Plan. We look forward to the City Staff and the Planning Commission taking appropriate action on this segment of the 2040 Plan and eliminating the King Farm Blvd route.

Barbara Murry, Resident Council President



Alan S. Kaplan, Member at Large

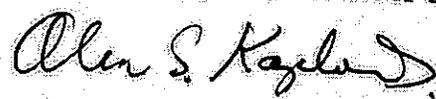


Exhibit (37)



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

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](mailto:management@kingfarm.org).

King Farm Citizens Assembly

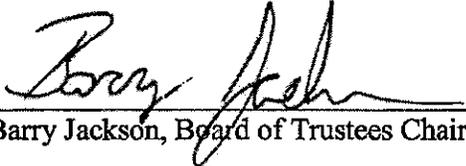
  
Barry Jackson, Board of Trustees Chair

Exhibit 40



June 18, 2019

Rockville Planning Commission  
111 Maryland Avenue  
Rockville, MD 20850

Re: Comments on the Draft Rockville 2040 Comprehensive Plan Update

The Washington Metropolitan Area Transit Authority (Metro) offers the following comments on the Public Hearing Draft of the Rockville 2040 Comprehensive Plan Update. Metro appreciates the opportunity to review the proposed revisions to the City of Rockville's land use and transportation policies. If you have any follow-up questions or require further clarifications, please contact Nina Albert, Vice President for Real Estate and Parking (LAND), by email at [nmalbert@wmata.com](mailto:nmalbert@wmata.com) or by phone at (202) 962-2616.

### Rockville and Metro

We commend the City for drafting a plan that affirms Metro's role as an anchor for Rockville's prosperity and future growth. In addition to its call to "actively support" WMATA's bus and rail services (Transportation Policies 10 and 12), the plan's land use elements will strengthen Rockville's transit-oriented communities and leverage the value of its three Metrorail stations (i.e. Twinbrook and Rockville within city limits and Shady Grove just beyond the city limits).

### General Land Use Policies

In late 2018, Metro eliminated the 'Grosvenor turnback' service pattern on the Red Line, thereby doubling service to Rockville stations during peak hours. This investment in service, in tandem with the region's commitment to Metro's capital needs, demonstrates Metro's support for transit-oriented growth in Rockville. Metro is therefore pleased that the plan allows for greater densities near Metrorail stations. Allowing more high-density development next to Rockville and Twinbrook stations (Land Use Policies 4, 8, 10) maximizes the benefits of transit-oriented development where denser land use contexts are already well-established.

In existing low-density areas near transit, the plan (specifically Land Use Policies 2, 3, and 9) proposes three land use classifications, Residential Detached (RD), which would allow up to two dwelling units, and Residential Attached (RA) and Retail and Residential Mixed (RRM), which would allow at least three or four dwellings per parcel and retail in RRM zones. Given the importance of transit-accessible housing to the region's affordability these policies will maximize the opportunities for housing production in low-density areas within the ½-mile station walkshed while preserving neighborhood character.

### Washington Metropolitan Area Transit Authority

600 Fifth Street, NW  
Washington, D.C. 20001  
202/962-1234

By Metrorail:  
Judiciary Square-Red Line  
Gallery Place-Chinatown  
Red, Green and  
Yellow Lines

A District of Columbia  
Maryland and Virginia  
Transit Partnership

By taking these reasonable steps to meet demand for homes and jobs near transit, the city will also maximize the value of taxpayers' existing investments in Metro. Transit-oriented development helps to secure Metro's future by growing our customer base and supporting operating cost recovery.

### **Walkability**

Walkable streets are fundamental to transit-oriented communities. Even if a Metro station or bus stop is nearby, fewer people use transit if walking there is inconvenient, unsafe, or uncomfortable. Therefore, WMATA strongly supports the proposed policies to ensure the built environment fosters walking, biking, and transit-oriented lifestyles (Land Use Policies 11, 12, 13; Transportation Policies 16, 17, and 18). While the city lacks direct control over the design of major roadways like MD-355, its planning authority offers tools to create more walkable places through pedestrian-friendly urban design and land use. Metro is pleased that the plan seeks to take advantage of these opportunities.

### **Development Review Standards**

Metro strongly supports the proposed reforms to the city's Comprehensive Transportation Review (CTR) and parking requirements (Land Use Policy 9). From a transit perspective, minimum parking ratios and traffic impact mitigation requirements can be highly problematic. In modeling future parking and car trip generation, these tools often overestimate the traffic and parking needs of transit-oriented communities. These projections trigger mitigation requirements, which themselves can be based on standards that are unrealistic and inappropriate for a walking- and transit-oriented area (e.g. ensuring free-flow traffic at rush hour or ample free parking on Black Friday). The resulting changes – increased parking supply and vehicular capacity – directly undermine transit and transit-oriented development by facilitating more driving and detracting from the walkability of the area. Metro is therefore pleased that the plan calls for a reevaluation of these requirements.

### **WMATA Property**

#### *Rockville Metrorail Station*

The proposed Land Use Policy Map (page 35, figure 5) classifies the west side of the Rockville Metrorail Station as Office (O). WMATA recommends a change to Office Residential Retail Mix (ORRM). This classification will allow more flexibility in determining the final uses and enables the property to better respond to real estate market conditions, which may vary over time. Flexibility will also support development of a multi-use project that enhances the experience for passengers using this central transit hub for connections and transfers or as their destination. This approach is also essential to ensure the property can adapt to future transit facility needs such as expansion of local bus services or the proposed Rockville Pike and Veirs Mill Bus Rapid Transit (BRT) projects.

### *Twinbrook Metrorail Station*

The proposed Land Use Policy Map (page 29, figure 4) classifies four parcels on the west side of the Twinbrook Metrorail Station area as Park (P). One of these parcels is owned by WMATA and is being considered as a joint development site. Therefore, WMATA recommends a change to Office Residential Retail Mix (ORRM) for all four parcels. This classification would align with the greater station area and not eliminate development potential, particularly when funding sources for the park have not yet been identified or compensation negotiated. Since this location is a greenfield site, it presents an immediate opportunity for WMATA to increase access to housing and jobs within 400 feet of the Metrorail entrance without disrupting existing bus and transit parking facilities. Such types of development within the ½-mile station walkshed are crucial for WMATA to grow its ridership base and to sustain its operations and service frequency.

The Authority does agree with the intent of the proposal to increase the availability of open space for social and civic uses. However, WMATA believes this could be better accomplished by enhancing the plaza directly in front of the Metrorail station entrance and by incorporating public green spaces as part of any new development projects within the ½-mile station walkshed. This approach would provide greater community benefits by spreading park land across the station area rather than concentrating it to one side of the station. Park space for recreational purposes that requires larger footprints could additionally be provided by utilizing the rooftops of public or private parking garages. While not traditional park space, these locations could create a special attraction and vantage point to observe the new offerings and growth of the Twinbrook Station neighborhood.

Exhibit 45

Cynthia Kebba

From: noreply@civicplus.com
Sent: Tuesday, June 18, 2019 4:49 PM
To: Comprehensive Plan
Subject: Online Form Submittal: Rockville 2040 Public Testimony

If you are having problems viewing this HTML email, click to view a Text version.

Rockville 2040 Public Testimony

The Planning Commission needs your input!

You may provide testimony to the Planning Commission on the draft Rockville Comprehensive Plan through this online form, in addition to any email or physical mail testimony you submit directly to the Planning Commission.

All submitted testimony is considered an item of public record and will be included in the Planning Commission testimony report for the draft Comprehensive Plan.

Which Plan element(s) is your testimony about?

- [X] Land Use and Urban Design
[] Transportation
[X] Recreation and Parks
[] Community Facilities
[] Environment
[] Water Resources
[] Economic Development
[] Housing
[] Historic Preservation
[] Municipal Growth
[] Other

Name (required):\*

Vincent Russo

Address of Residence (recommended):

1019 DeBeck Drive, Rockville 20851

Email Address (recommended):

By including your Address of Residence or Business and/or Email Address, you are expressing your willingness for staff to contact you for clarification or for legal notifications related to the Comprehensive Plan.

Please type your testimony in the field below:\*

I live in the Twinbrook neighborhood bounded by the Pike, Veirs Mill, and Edmonston Drive. I support the Rockville 2040 aims of placing greater residential density adjacent to our Metro stations and transit corridors like Route 355 and Veirs Mill. I also would like to see more walkable amenities and destinations in my immediate neighborhood which is currently underserved in this respect.

parks, allowing more flexible residential land use while maintaining a high quality of life in existing neighborhoods, etc..

\* indicates required fields.

View any uploaded files by [signing in](#) and then proceeding to the link below:  
<http://www.rockvillemd.gov/Admin/FormHistory.aspx?SID=12>

The following form was submitted via your website: Rockville 2040 Public Testimony

Rockville 2040 image:

Which Plan element(s) is your testimony about?: Land Use and Urban Design, Recreation and Parks

Name (required):: Vincent Russo

Address of Residence (recommended):: 1208 DeBeck Drive, Rockville 20851

Current Address (recommended): 1208 DeBeck Drive, Rockville, MD 20851

Please type your testimony in the field below:: I live in the Twinbrook neighborhood bounded by the Pike, Veirs Mill, and Edmonston Drive. I support the Rockville 2040 aims of placing greater residential density adjacent to our Metro stations and transit corridors like Route 355 and Veirs Mill. I also would like to see more walkable amenities and destinations in my immediate neighborhood which is currently underserved in this respect. For this reason I encourage policy actions in the 2040 plan that promote development of a community node at Edmonston and Veirs Mill.

The Planning Commission should add a provision in the 2040 plan to straighten Edmonston Drive so that it intersects with Veirs Mill at a single location instead of the current two. This will enhance pedestrian convenience/safety and facilitate traffic flow along this busy corridor. One stop light instead of two! Most importantly a four-square intersection will enhance its appeal as a community node along the BRT route and create more space for this purpose, ideally to include walkable retail. In addition, the plan should allow for opening Hillcrest Park to Veirs Mill which will provide an aesthetically pleasing entrée into the neighborhood and promote utilization of this park.

Allowing greater housing density along Veirs Mill helps preserve the predominant character of Twinbrook as an affordable, single-family home neighborhood by reducing the pressure for turning the existing single-family homes into boarding houses. Hopefully the RA (Residential Attached) designation along Veirs is adequate to achieve the desired density. Could larger apartment buildings be accommodated here to leverage the transit links and help support neighborhood-based retail? Something to consider.

The 2040 plan offers the opportunity to dramatically improve the appeal of this area while at the same time promoting multiple 2040 goals, e.g. integrating land use and transportation planning, promoting walkable neighborhoods, planning for parks, allowing more flexible residential land use while maintaining a high quality of life in existing neighborhoods, etc..

Additional Information:

Form submitted on: 6/18/2019 4:48:33 PM

Submitted from IP Address: 146.142.1.10

Cynthia Kebba

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**From:** Sara Moline <smoline1005@yahoo.com>  
**Sent:** Tuesday, June 18, 2019 4:57 PM  
**To:** Planning Commission  
**Subject:** 2040 Plan Comments

Good Afternoon,

My name is Sara Moline and I am a lifelong (30+ yrs) resident of Rockville. I have a background in the arts and have served on and chaired the Cultural Arts Commission, a volunteer position which prepared me for my current paid position as Project Coordinator for WMATA's Art in Transit Program. I also have experience volunteering for the City with regards to the Rockville Summit, the Traffic & Transportation Working Group for the 2040 Plan, as well as the BRT Corridor Advisory Committee for Route 586 Veirs Mill Road.

I would first like to thank the Planning Commission for making recommendations in the 2040 plan that promote the need to maintain and expand upon our arts & cultural assets.

I wish to make you aware of a Creative Placemaking Plan that I am developing for Rockville as my Capstone project for a program I am currently enrolled in. In this plan I have included recommendations for some of the sites you have mentioned in the 2040 plan, including 255 Rockville Pike, Promenade Park, and the Metro stations. It also includes RedGate Golf Course – which I strongly urge the commission to help retain as Park/Open Space and consider expanding upon our arts & cultural assets at this site! The plan also considers creative approaches to tackling issues such as pedestrian safety and increasing cultural tourism via possible partnership with Amtrak. Overall, several projects recommend in the plan have potential for significant positive impact on economic development. I will be submitting this Capstone project within the week and therefore anticipate receiving my Certificate in Creative Placemaking soon after. Ultimately, I plan to share the final document with the Mayor & Council, but would love to share it with your commission, other boards/commissions and departments for feedback and opportunities to make adjustments.

Regarding transportation, I support transit-oriented development (including affordable housing!) and infrastructure improvements for pedestrians and bicyclists. I would like to state that while I do support the concept of BRT, I still feel conflicted about its usefulness on the Route 586 Veirs Mill corridor if it's only expected to increase travel by 15min.

I don't see how this project is going to make much difference if we have no dedicated lane the full length of the corridor. If BRT and local buses will operate in the same lanes, both with traffic and in sections of proposed dedicated lanes, how will BRT benefit? Would it not at some point get hung-up by slower moving WMATA buses that stop more frequently?

Regarding WMATA, I believe improvements could be made to the Q bus lines to streamline current service, which I think should replace proposed BRT rather than act a short-term solution. Having grown up on this road, I have ridden along various sections of the Q route many times. I never understood why there were so many different numbers associated with the Q buses. When I volunteered on the MD Route 586/Veirs Mill Road Corridor Advisory Committee, I recall a meeting in which I asked what the differences were between each Q bus. During this time there was also a proposal for a Q9 express, which I opposed, due to the fact that there are already five Q lines operating on this route. I think the organization of the Q lines is confusing, considering all lines run the route, but the stops they make and/or the time of day they make these stops is what varies.

To simplify the Q lines (Q1,2,4,5,6), I propose eliminating three of the five lines. The remaining two lines could be restructured as follows:

Q1

- operate from earliest possible a.m. time to latest possible p.m./after midnight time with 10min headways all day
- operate the entire length of the route from Shady Grove to Silver Spring, including Montgomery College Rockville Campus

Q2

- operate from earliest possible a.m. time to latest possible p.m./after midnight time <10min headways all day OR only during rush hours (i.e. RideOn 101)
- limited stop express service

In my opinion, it makes sense to streamline buses operating along this route. I understand this is a State-owned road that passes thru City of Rockville and County properties, with WMATA running bus service the full length of the corridor. I know it's one of the most heavily travelled corridors in the region, in which a large percentage of ridership is made of up lower income residents, and there is future proposed growth along the corridor.

BRT operating along this exact same route, between Montgomery College, Rockville and Wheaton Metro Stations, would be totally redundant to the existing Q route.

I support the concept of the improvements recommended in Alternatives 2.5 and 3 shown below, and it is my understanding that WMATA preferred Alternative 3. However, I don't see why WMATA can't do this itself with financial support from City, County and State, instead of the County creating a whole new expensive system for only a portion of the Q route.

**Alternative 2** – *Transportation System Management (TSM) with Intersection Queue Jumps and Enhanced Bus Service: Alternative 2 would consist of minor infrastructure improvements at select intersections and the implementation of a limited-stop, enhanced bus service, similar to the proposed WMATA Q9 route. The minor infrastructure improvements would include enhanced bus stops with features such as shelters, real-time information, off-board fare collection, installation of transit signal priority (TSP), and widening for the installation of queue jumps. The proposed enhanced bus service would include 12-minute headways in the peak period and 15-minute headways in the off-peak period.*

**Alternative 2.5** – *New BRT Service with Intersection Queue Jumps: In general, Alternative 2.5 would include the roadway improvements from Alternative 2 and the bus service improvements from Alternative 3. The minor roadway improvements would require widening for the installation of queue jumps at select intersections. Alternative 2.5 would use the same 12 station locations that were assumed for Alternatives 2 and 3 and new BRT stations would be constructed at each of the 12 station locations. Appendix A4 provides detailed plans of the queue jump locations. The proposed BRT service would include six-minute headways in the peak period and ten-minute headways in the off-peak period.*

**Alternative 3 – New Bus Rapid Transit Service in Dedicated Curb Lanes (where feasible):** *Alternative 3 would consist of widening or repurposing the existing travel lanes and shoulders along Veirs Mill Road to provide dedicated, curb-running bus lanes and a new BRT service. The dedicated lanes would be provided for the BRT service in areas where the improvements would result in minor ROW impacts and would improve bus service by increasing the travel speeds. The proposed BRT service would include six-minute headways in the peak period and ten-minute headways in the off-peak period.*

Even still, there's no proposed dedicated bus lane running the entire length of the corridor due to feasibility, so this project overall doesn't seem worth it to me, because it won't be much more efficient or different than WMATA's current service - just a few nice features. It would make more sense to put pressure on WMATA to improve its Q route service as I have suggested, along with adding more shelters, real-time info, off-board fare collection and transit signal priority. City, County and State should support WMATA with the transit signal priority and queue jumps. This would align with findings from the Bus Transformation Project which was recently completed.

Thank you for your consideration.

Kind regards,

Sara Moline

Alan Tabachnick, HDC Commissioner  
June 17, 2019

Exhibit (49)

NOTES ON ROCKVILLE COMPREHENSIVE PLAN— From Historic District Commission— HD

- Land Use Chapter, Page 16: Could there be a goal added to incorporate historic preservation concepts into land use planning, preserve, rehabilitate, restore, and employ context sensitive design when constructing new buildings or next generation housing/attached residential.
- Page 36: Is it possible to add something about utilizing interpretive signage tied to increased walking, paths, sidewalks, to help residents better understand the history of their neighborhoods and potentially specific districts and/or landmarks.
- Page 52: Policy 25, could you include a recommendation that prior to any plan being implemented, a full cultural resource survey, both architectural and archaeological, should be undertaken on the large properties to identify known and potential historic and prehistoric resources that should be taken into consideration prior to any development.
- Page 74: Transportation. Recommend that as part of any redesign/upgrade improvements to the current Rockville Station that some interpretive materials/displays/boards be prepared to illustrate the history and significance of the original Rockville Station, and perhaps something talking about why and how it was relocated due to the Red Line, and the importance of historic preservation to Rockville and the County.
- Not sure what interpretive information is available at or around the old train station, but that is a great opportunity to promote historic preservation and to tell a story of the history and importance of transportation in Rockville.
- Historic Preservation Section, Page 206: Recommend beefing up the history of the historic preservation movement section and how what happened locally in Rockville was reflective of the national threat at the time (urban renewal, etc.). It might be helpful for readers to understand a bit more about the earlier historic preservation movement and how it evolved over time, from a local type effort to save a landmark or a district (Mt. Vernon, New Orleans) to a regulatory process set up in the 1960s as a result of urban renewal and the demolition of Penn Station in New York.
- Would like to see more discussion of the potential for archaeological resources across Rockville, and how there are likely remains from 10,000+ years ago associated with Native American presence, through to the present. And that a cultural resource, or historic property, likely has an above ground component (the building or structure) and a below-ground component, such as buried trash pits, cisterns, wells, privies, outbuilding foundations, etc.) All are important in understanding the history and development of Rockville and this should be mentioned as an important facet for everyone to consider during planning and development.
- Page 215: It would be helpful to perhaps mention the Section 106 process of the NHPA and how it requires federal agencies and/or those using federal funds or requiring a federal permit, to take into account the effects of its action on historic properties. That includes National Register listed properties as well as those determined eligible for the NRHP by the SHPO. And it is not only mitigation, but it forces agencies to look to avoid and/or minimize impacts first, and then if they can't, then they go to mitigation of adverse effects.
- Would like them to go back and see where archaeology can be woven into the discussion of land use, development, parks, and how to think about the potential for sites to be present across Rockville, and how we should understand what may be out there, and what may be important, and how to plan for that going forward. In concert with the County, perhaps?

HDC

49

Matthew Goguen  
 Comprehensive Plan  
 DRAFT for Public Hearing Notes

Some general comments regarding the Draft Comprehensive Plan:

p. 207

- Change “augmenting” to “expanding” and add “historic” between “designated resources”

p. 208

- Suggest highlighting W. Montgomery Avenue, S. Washington Street, and B & O Railroad in one color and all of the other historic districts in another color to coincide with the text to show the continuity of historic districts in Rockville.

p. 209

- For each of the representative buildings, add some basic historic facts like when it was designated, architectural details, etc. to show off some of Rockville’s heritage

p. 211

- Archaeology is only mentioned once in this draft and should be incorporated more into the various Goals and Policies.

p. 213

- Add public input to second paragraph of Policy 2.
- Regarding Policy 3, does historic preservation come up in other sections? If historic preservation must be thoughtfully weighed with land use, housing, environment, transportation, etc., will those topics thoughtfully weigh historic preservation?

p. 217

- Add “archaeological resources” to 5.9.
- Add Lincoln Park Historical Foundation to Policy 7.

p. 218

- Rockville should work with community partners to publically disseminate and host oral history interviews mentioned in 7.6.