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September 16, 2009

The Honorable Phil Andrews
President, Montgomery County Council
Council Office Building
100 Maryland Avenue
Rockville, Maryland 20850

Re: Written Testimony from the City of Rockville on the Draft Update to Montgomery County's Gaithersburg West Master Plan

Dear President Andrews:

The purpose of this letter is to submit comments from the City of Rockville on the Gaithersburg West Master Plan in advance of decisions that the Montgomery County Council may make. As you know, the Montgomery County Planning Board approved the draft Plan update on July 16, 2009, and the County Council has scheduled Public Hearings on the plan for September 15 and 17, 2009. We submitted a similar letter, which is attached, to the Montgomery County Planning Board during its comment period in March 2009.

In general, Rockville supports the long-term economic benefits of the Life Sciences Center (LSC), which will be highly beneficial to Rockville residents in terms of job creation, health care and educational opportunities. Rockville agrees with the approach of the Draft Plan, to take a strong and forward-looking approach by embracing and leveraging key regional assets that distinguish this portion of Montgomery County from other regions of the country and the world. Those assets include (but are not limited to) NIH, NIST, FDA, Johns Hopkins University, the Universities of Maryland at Shady Grove, Montgomery College, and Adventist Healthcare.

The City also supports the enhanced approach to both multi-modal transportation and public amenities, including the explicit incorporation of pedestrian and bicycle infrastructure as well as the Corridor Cities Transitway (CCT) as a requirement early in the development process. The City particularly applauds the inclusion of connectivity of the proposed LSC Loop and other multi-modal trails to the Rockville, Gaithersburg and Montgomery County systems. By doing so, the Draft Plan is attempting to incorporate key quality-of-life components into an area that is being recommended for a great increase in density, rather than having those demands be served elsewhere in nearby communities such as Rockville.

The City of Rockville continues to have concerns, however, which we believe must be addressed in order to ensure that the quality of life for those within and near the planning area is at the high level that Rockville citizens expect and deserve.

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Development Totals, Traffic and Staging

In our comments to the Planning Board in March, we were concerned that the staging requirements described in the draft plan were insufficient and unclear. Improvements have been made, especially with respect to clarity; but additional improvements are still needed.

The staging requirements (P. 64 of the Planning Board Draft) link permission for development to certain public actions and investments. While we applaud the elevation of funding and construction of the Corridor Cities Transitway (CCT) in the Staging plan, and the addition to the Plan of specific intersection improvements, the City of Rockville remains concerned that insufficient infrastructure construction is required to accommodate the additional 9.5 million square feet of new commercial development that would be permitted, especially with respect to the impacts on Rockville.

In particular, we do not believe that the Draft Plan adequately accounts for and manages the impacts of the large amount of new automobile traffic in and out of the planning area, especially for the large amount of traffic that would be passing through Rockville. Even the most aggressive of the Draft Plan's targets for alternative transportation modes still anticipates at least 70% of new employees and residents using automobiles. Considering the large number of new employment and homes, we anticipate both major arterials and secondary roads to be heavily impacted. Arterials of greatest concern to Rockville include Darnestown Road, Key West Avenue, West Montgomery Avenue (MD 28), and the I-270 ramps, in addition to the potential impact on I-270 itself. Secondary roads that must be studied and then managed include Wootton Parkway, Fallsgrove Boulevard, Blackwell Road, Watts Branch Parkway and other Rockville streets. Rockville staff has raised these concerns in meetings that have been held with staff from Montgomery County Department of Transportation, Planning Department and the State of Maryland.

Rockville appreciates the addition to the Plan of a recommended improvement to the intersection at Key West Avenue and Shady Grove Road, but does not believe it to be sufficient. First, the Plan recommends that *funding* the improvement, but not actual *construction*, be a requirement for Stage 4, after 5 million square feet will already have been constructed. That requirement is much too late in the process, and should be advanced forward to Stage 2.

More importantly, improving the intersection would almost certainly have the consequence of increasing the impact on the already highly overburdened entrance to I-270 at Route 28. This Plan must recognize the reality of the impacts that will occur outside of the Planning Area as a result of the new development, including how drivers will access the Life Sciences Center. There is no location more pressing in this regarding than the intersections that connect I-270 and the LSC. The Plan must address this area as an overall system and incorporate appropriate investments so as not to diminish the quality of life of those around the LSC, including within Rockville; and those investments must be part of the staging requirements. Otherwise, Rockville believes that the County Council should reconsider the overall scale of permitted development.

In addition, current Staging Requirements do not include requirements for the development of the residential units. The City believes strongly that this link should be made in the plan, so that there is adequate planning for the impacts of thousands of new housing units.

In general, the City also believes that the Plan should describe more specifically the advantages of the proposed level of additional development. The Plan should consider alternative methods of achieving the goals and visions of the Life Sciences Center, which may include revisiting the overall scale of development. The quality of life of a large number of Montgomery County residents would be severely degraded if the private development moved forward without the infrastructure and community amenities required to support that development.

Transit

The Corridor Cities Transitway (CCT) is at the core of the Draft Plan and, once built, will pass through Rockville in the King Farm neighborhood. The City strongly supports the development of the CCT, but the Plan should also consider alternative phasing and/or densities should the State not fund the project or approve the Draft Plan's recommended realignment.

Open Space

The City supports the Plan's general statements regarding the provision of open spaces, but has the following recommendations regarding open spaces in the Plan:

- Developers should be required to meet at least minimal standards for provision of public open space or publicly accessible open space. A goal of 12 acres per 1,000 residential population would be appropriate, as this is the standard set forth by the National Recreation and Park Association.
- Parkland needs to be more than just "civic green spaces." The 15 percent public open space requirement needs to be made up of significantly sized park parcels, not just "urban squares," "urban promenades," stream buffers, and pieces of rights-of-way.
- Parkland should contain approximately 50 percent "developable" land for recreational amenities. The remainder can be forested stream valley and/or other "passive" open space to accommodate the recreational demands of the adults and the children who will occupy the 4,200 additional residential units.
- The preferred scenario is to dedicate public parkland to the MNCPPC, as that approach will provide greater insurance that the properties will be maintained over the long term.
- The Plan should include stronger language requiring developers and institutions to work with the Cities of Gaithersburg and Rockville to improve connectivity.

Other Public Amenities

The Draft Plan recognizes and plans for needs in the areas of schools, open spaces, civic spaces, transit and other public services and amenities. It is very important, however, that details on the locations, sizes, and types of facilities be

carefully planned and programmed, both to serve the new residents and to minimize the impacts on surrounding communities such as Rockville.

As a final point, the City of Rockville requests that the implementation steps of the Plan, if approved, be coordinated between the County and the City. Examples would include exploring whether there are opportunities for joint policies that will ensure compatible development along the City boundaries, and final decisions on the amount, siting and the type of public facilities, such as community centers, schools, libraries, and others are made in collaboration with the City.

Thank you very much for your attention to this testimony.

Sincerely,

Susan R. Hoffmann, Mayor
City of Rockville

Attachment

cc: Isiah Leggett, Montgomery County Executive
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Councilmember Piotr Gajewski
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