OFFICE OF THE COUNTY EXECUTIVE
ROCKVILLE, MARYLAND 20850

Isiah Leggett
County Executive

MEMORANDUM

October 5, 2009

To: Phil Andrews, Council President

From: Isiah Leggett, County Executive

Subject: White Flint Sector Plan

I am pleased to have the opportunity to provide the Council with my comments and the fiscal impact analysis for the White Flint Sector Plan. I am also attaching technical comments from the various County departments along with appendices with the fiscal impacts of the White Flint Sector Plan.

I commend the Planning Board and its staff on their hard work and vision for White Flint. The draft White Flint Sector Plan is a paradigm of smart growth with its focus on transit and reuse of acres of surface parking lots; however there are aspects of the Plan about which I have concerns. This Plan needs to be considered in the broader context of what is planned both north and south of the Planning Area. The related developments, including the BRAC development at Bethesda Navy Hospital, are critical considerations in the viability of this Plan.

The White Flint Sector Plan, done correctly can reap great benefits upon future generations. If not done correctly, it can leave a legacy of impaired air quality and quality of life. I have four primary concerns. One is the traffic impacts that will result from implementation of the draft Plan, particularly with BRAC looming on the horizon. A second concern is that the Plan is predicated on a zone that has not yet been created and that is therefore not fully understood. There is much work to be done on this zone which will no doubt be significant to the Plan. Given the importance of the White Flint Sector Plan, it is critical that the zone be carefully evaluated before significant decisions are made on the various elements of the Plan. The third and fourth concerns are related. The County Council and I, at the appropriate budget cycle, will need to evaluate how the infrastructure can fit into the CIP given competing priorities. As with any project, this will need to be undertaken in the context of the entire CIP at the time of the project. Finally, there has been a lot of discussion about how portions of the developers' share of costs can be publicly financed. There are public finance tools available that

can be put in place at the appropriate time. As a long range land use tool, the Sector Plan should not address the complex issue of public financing of infrastructure.

The draft Plan reflects many important principles that we can all agree are important – smart growth, as I mentioned above, and a focus on a vibrant urban area. As Bethesda approaches build-out, a more urban version of White Flint as a focal point for urban commercial activity is envisioned to emerge. While the draft Sector Plan covers a thirty year period, it is expected that significant redevelopment along Rockville Pike is imminent which will require significant budget decisions and weighing of priorities.

The draft Sector Plan proposes 9800 new dwelling units and 5.69 million square feet of new commercial space for a total of 14,341 dwelling units (of which 2,674 would be affordable) and a total of 12.98 million square feet of commercial space. The Plan proposes to transform Rockville Pike into a pedestrian friendly boulevard with traffic moving at a more relaxed pace. To manage traffic and pedestrian activity, the Plan proposes a new transportation network with a grid of public streets. This grid is intended to relieve pressure from Rockville Pike and support the development that is proposed around it. Other key infrastructure elements within the Plan include a new northern entrance to the Metro station, a new MARC rail station, a fire station, an express library, a Regional Services Center satellite office, and parking for the public. Additionally, the Plan proposes a 39% mode split for non-vehicle trips with a requirement that prior to proceeding to stage two of the Plan a 30% non-vehicle mode split must be accomplished and prior to proceeding to stage three of the Master Plan a 35% non-vehicle mode split must be achieved. But will it all work without creating major amounts of congestion? As I indicated in my comments on the proposed 2009 Growth Policy, I do not favor intentionally creating congestion because of the impacts that congestion will have both on quality of life and the environment.

With its focus on redevelopment of acres of asphalt parking lots, the draft White Flint Sector Plan is aimed at being more environmentally friendly. Existing surface parking lots produce uncontrolled and untreated stormwater run-off. The new residential and commercial space will create stormwater management facilities to qualitatively and quantitatively handle stormwater. The Plan also is intended to create green spaces where none currently exist. The Planning Board is proposing to move the County in a very positive direction with this approach; however, where the Plan thoughtfully addresses stormwater, it does not address diminished air quality that will result from intentionally congested roads – congestion that may be significantly understated.

Infrastructure called for in the draft White Flint Sector Plan will be paid for from the following four sources: i) State funds; ii) County general obligation bonds (County general fund); iii) Developer provided exactions; and iv) special district impositions tied to redevelopment. Executive staff estimates that as proposed in the draft Plan, the public sector would pick up approximately 34% of the costs associated with redevelopment, including 9% from the State and 25% from the County. The private developers would directly provide 25% of the needed infrastructure, and the remaining 41% is proposed to be paid for through special taxes

or assessments levied in some form of special district financing mechanism. For the White Flint Sector Plan, the public/private sharing of overall costs to achieve a vision for smart growth redevelopment and creation of new transit-oriented employment and housing to replace outdated, inefficient surface parking lots is a reasonable approach.

This draft Plan involves other significant policy considerations that are set out below.

Fiscal Impacts

My staff has reviewed the draft White Flint Sector Plan and estimates that the infrastructure called for by the draft Plan totals $894 Million. Of this amount, $225 Million is assumed to be provided by private developers through the development process. An additional $370 Million is to be paid for through some type of a public financing vehicle such as a development or similar district. $78 Million is assumed to be paid for by the State and approximately $221 Million is to be paid for by the County through the CIP process. These figures do not include the provision of public and private parking capacity. The Plan calls for 9000 public parking spaces which are to be privately funded at an estimated cost of approximately $360 million. A summary of the anticipated costs is attached as Appendix A.

County departments, with the assistance of Municap, Inc., a County financial consultant, estimates that the overall net fiscal impact of the draft Plan based on a forty year build-out is $6.9 Billion and the annual net fiscal impact is $131 Million. These calculations are based on a total projection of 39,072 direct jobs (existing and created) resulting from the development contemplated in the draft White Flint Sector Plan and 25,463 indirect jobs. The projected number of jobs is less than that used in the draft Plan and is based on the program utilized by our consultant. The significance of this number though is that it results in a reasonably conservative estimate of the net fiscal impacts of the Plan. A summary of the total and annual net fiscal impacts is attached as Appendix B.

CIP Impacts

It is important to realize that several properties are ripe for redevelopment and contemplate redeveloping imminently. One property owner with major holdings along Rockville Pike suggests that it will be ready to redevelop its property as early as 2012 and will need to have some of the public infrastructure move forward at that time. It is clear that other property owners are not far behind in anticipating redevelopment.

For Stage 1 of the Plan to move forward, staff estimates that approximately $57.2 million of general obligation supported funds will need to be programmed in the CIP. I expect that some of these funds will need to be included in the FY13-18 CIP, and perhaps sooner depending on the pace of private development. Both the County Council and I make budget decisions every budget cycle and in between cycles. The CIP amounts proposed for the draft Plan will need to be evaluated in the context of the budget cycle with complete information as to

what projects would actually go forward and on what schedule. To accommodate this amount of funds, the County Council and I will need to determine how this amount fits within the spending affordability guidelines at the time a project is proposed. We will need to evaluate the value of these improvements with other priorities in the CIP.

Public Financing of Infrastructure

A unique aspect of the draft Plan is that it proposes vehicles for public financing of infrastructure. I am very opposed to the Plan addressing the methodology of funding infrastructure. Land use plans, once adopted, are intended to govern the long range approach to development of land, not the longterm approach to management of the County's debt and budget. Spelling out a particular method of public financing in a master plan could have undesirable and unintended consequences, including raising not only expectations, but also questions of affordability, debt burden, and County priorities when reviewed by underwriters and others. This concern, could tie the hands of future County Councils and Executives in an unprecedented manner.

During development of the draft White Flint Sector Plan and in the Plan itself there has been extensive discussion about using tax increment financing ("TIF") to fund a large portion of the necessary infrastructure. The draft Plan characterizes such financing as funding the private share of development costs. There is also a suggestion that impact taxes be charged for residential development but not for commercial development. Conversely, commercial development would be assessed to pay for financing under a TIF while residential development would be excused from a continuing obligation under a TIF. I have many concerns about such proposals.

The world of public financing is very complicated and sensitive. As I said previously, how the County chooses at any point in time to fund infrastructure does not belong in a thirty year plan for land use. Section 305 of the County Charter is a key factor in determining how we fund infrastructure. The financing vehicle that is ultimately employed should be outside of the limitations of Charter Section 305. It should be noted that even though a particular financing tool may not go against the County's Charter limits, the amount of any such obligations are considered in the rating agencies' routine evaluation of the County's financial structure, capacity and soundness.

The County has not pursued TIFs for very sound reasons. I do not support use of a TIF to allow development to proceed under the White Flint Sector Plan. While the County has a policy that development should pay for itself, a TIF runs counter to that policy because it draws from increased tax revenues and dedicates them to pay for infrastructure required for a given project. The result is that property owners subject to a TIF are relieved from their share of the overall tax burden for general services to the extent of the TIF. Consequently, all other taxpayers pick up the difference.

Additionally, if actual TIF revenues fall short of the projections made when the TIF bonds were sold, which they could, the County would be in the precarious position of either having to step up to cover bonds it never intended to cover or let the bonds go unpaid. I believe this is an equally unacceptable position in which to place the County taxpayers. The use of other revenues would undermine the reason for using a TIF in the first place and would result in a much heavier burden on the general taxpayers.

As I mentioned in my testimony to the Planning Board, I am also concerned about the fairness of using a TIF and the fragmentation of the tax base where newer affluent development reserves its property taxes for itself rather than contributing to growth Countywide. This financing policy could be particularly detrimental to existing older areas, such as in Wheaton.

Given the fact that we are in unprecedented times of budget shortfalls due to factors that are well beyond the control of local government, it would be ill-advised to pledge any portion of County revenues so that the full tax base is not available for the County to determine how its revenues should be best used.

The draft Plan has also recommended differentiating in the types of taxes and assessments to be paid by residential and commercial development. I do not agree with this approach. There are complicated and important consequences to such an approach; one of which is that the financing vehicle for commercial development could end up being characterized as a loan, and thus taxable under IRS rules.

During its deliberations, the Planning Board discussed different financing approaches with Executive staff. The County can create one or more Development Districts that are expressly tailored to enable development to pay for itself without counting against Charter Section 305. There are other options as well. Staff will be available at worksessions on the draft Sector Plan to discuss the pros and cons and implications of financing tools that could be used to pay for infrastructure. Again, though, none of these tools should be specified in a master plan.

Environment

The Planning Board has made a valiant effort to focus development on surface parking which should at a bare minimum do no harm to the environment. That in itself is commendable in an area targeted for growth. The creation of stormwater management facilities to address both the quantity and quality of stormwater will be positive for the environment. On the other hand, the congestion on the roads that is envisioned by both the Master Plan and the proposed Growth Policy can reasonably be expected to result in greater levels of air pollution. Therefore, I continue to be opposed to LOS E which, given the new development and what we know will result from the BRAC at the Bethesda Naval Hospital, will have a negative impact on air quality. I would like to see a greater emphasis on green areas as well.

Transportation

I am concerned about the consequences of the expansion of the Metro Station Policy Area and the overall increase in CLV to 1800 within some of the expanded area. I think that using ½ mile as the threshold for determination of the MSPA is too great of an extension. I am concerned about the overall impacts on traffic resulting from extension of the MSPA to within ½ mile of Metro. This Plan has the potential to result in far reaching congestion of arterial roadways. In this regard, the impact from the BRAC at the Bethesda Naval Hospital should not be underestimated. As I mentioned in my comments on the Growth Policy, I continue to believe that local area review is necessary even if PAMR is satisfied by transportation improvements.

Even with the expanded MSPA, two intersections fail. Without the expanded MSPA and proposed elimination of PAMR, eleven intersections are projected to fail. The plan should either recommend transportation improvements to eliminate failing intersections or provide for development at a level that can be met without intersections failing.

The draft White Flint Sector Plan has a far reaching vision for Rockville Pike where it will not remain the auto corridor that it is today, but instead will be transformed into a boulevard that will be attractive for vehicles and pedestrians alike. I very much support that portion of the Plan that calls for Bus Rapid Transit along Rockville Pike. I do not however think that Bus Rapid Transit should be limited to a one mile stretch of roadway. Rather, it needs to be part of a larger network. I am also concerned that as envisioned in the draft Plan, Rockville Pike will become a choke point and not serve the function it was created to serve as a major artery to and from the District. And the high cost of redoing Rockville Pike is not to be understated. Given all of the pressing transportation needs of the State, it is hard to imagine, now or even thirty years out, that the State will provide costly improvements to Rockville Pike to change its appearance into that of a boulevard. Perhaps it could happen with BRT as a viable element of a project, but otherwise, it is doubtful that the State would undertake such improvements.

This Plan proposes a 39% non-vehicle mode split and conditions stages of development upon achieving first 30% and then 35% mode split. While I support these mode splits, particularly given the proximity to transit, I think that they are ambitious and I am concerned about whether the goal will be met. Strict tracking of mode split will be very important for the success of this Plan. To attain the mode split contemplated by the Plan, I recommend that the north entrance to the White Flint Metro Station be expedited.

The draft Plan contemplates approximately 29,700 parking spaces which must include approximately 9,000 publicly accessed parking spaces to be managed by a parking authority. The costs of these spaces are assumed to be private costs. However, in order to address parking, this Plan should be undertaken in conjunction with the parking study that the Department of Transportation is currently undertaking. The long and short term parking should be as determined by the parking study which is to be completed by early 2010. Free parking should not be permitted.

Department of Fire and Rescue Services

The Plan as proposed does not allow MCFRS to deliver emergency services within a 6 minute response time to several areas north of the proposed station location. Therefore, I do not support the proposed location for a new fire station. The site next to Park & Ride is a preferred site. Given the frontage of this site, I recommend that there be other co-located public facilities. I also recommend that the fire station and any co-located public uses, such as park and ride, be considered for public/private joint development.

Montgomery County Public Libraries

If an express library is to be provided, it should be provided in Metro East rather than at the Mid-Pike location to enhance access by METRO users.

Housing

Consistent with our shared goal to increase levels of affordable housing, public facilities should continue to be evaluated over the life of the Plan for co-location with housing and for their potential to provide higher proportions of affordable and workforce housing.

Conclusions

The White Flint Sector Plan provides the right direction for future development with its focus on existing infrastructure and use of existing impervious areas. Its vision is ambitious. I am committed to working with the Council and the development and private communities to determine the best means of funding improvements called for by the Plan, but that is a process that will need to take place outside of the Plan itself.

There are significant studies and work being undertaken that can have an impact on the Plan that should be reflected in the final White Flint Sector Plan. These efforts include the parking and BRT studies and the work that the Council is set to begin on the CR zone. I am confident that the Council will coordinate these efforts so that the Plan can reflect what we learn from the studies and so that a full understanding of the CR zone is in place prior to adoption of the final Plan.

I again want to acknowledge the hard work and positive vision of the Planning Board and its staff in preparing the White Flint Sector Plan. My staff is committed to support the efforts of the Council.

Attachments: Appendix A
Appendix B
Executive Departments Technical Comments

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Montgomery Aquatic Center (MAC) Expansion[1]

Costs Type	Total Capital Costs	Amortization Period[2]	First Year Annual Costs
Capital:			
Building, design and construction	$18,466,227	20	$1,481,778
Other miscellaneous costs	$638,000	20	$51,195
Total costs	$19,104,227		$1,532,973

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]1-A*
5-Oct-09

[1]Source: Montgomery County, Department of General Services.
[2]Annual capital costs are assumed to be amortized over 20 years at 5%.

Appendix A

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Fire and Rescue Services[1]

Costs Type	Total Capital Costs	Amortization Period[6]	First Year Annual Costs
Operation:			
Personnel services[2]			$850,328
Fuel and maintenance[3]			$15,000
Sub-total			$865,328
One-time costs:			
Training costs[4]			$582,924
Vehicle, equipment, communications, ePCR			$504,000
Sub-total			$1,086,924
Capital:			
Facility[5]	$21,724,583	20	$1,743,237
Total first year annual costs			$3,695,489

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]2-B*
5-Oct-09

[1]Represents the costs for relocating Fire Station 23. Source: Montgomery County Fire and Rescue Services and Montgomery County Department of General Services.

[2]Assumes the following: two-person medic unit requiring 4.5 master firefighters and 4.5 firefighter-rescuer III's; totaling 9.30 work years.

[3]Source: Montgomery County Fire and Rescue Services and Montgomery County Department of General Services.

[4]Includes recruit salaries, instructor overtime for recruit class, and uniforms/gear for nine recruits.

[5]Does not include land acquisition and costs for new apparatus. Assumption is that existing Station 23 apparatus would be moved to the relocated station. The additional EMS unit costs are shown as operating costs. Source: Montgomery County Fire and Rescue Services.

[6]Annual capital costs are assumed to be amortized over 20 years at 5%.

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Upcounty Urban District[1]

Costs Type	First Year Annual Costs
Operation:	
Annual staff (14 positions)	$1,157,060
Annual operating expenditures:	
Services/contracts	$374,365
Charges from others	$9,364
Communications services	$6,500
Printing/central duplication services	$2,580
Mail	$760
Motor pool	$36,840
Travel	$1,000
Education, tuition, training	$3,200
Office supplies & equipment	$13,480
Motor vehicle equip and supplies	$5,000
Uniforms	$11,300
Other supplies and materials	$5,900
Rentals and leases	$2,100
Equipment repairs/maintenance	$1,700
Equipment repairs/maintenance	$2,000
Equipment repairs/maintenance	$2,000
Equipment repairs/maintenance	$18,141
Total Upcounty Urban District	$1,653,290

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]3-C*
5-Oct-09

[1]Source: Montgomery County Upcounty Regional Services Center.

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Bus Depot[1]

Costs Type	Total Capital Costs	Amortization Period[3]	First Year Amortized Costs[3]
Capital:			
Facility construction, land and other costs[2]	$80,000,000	20	$6,419,407

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]4-D*
5-Oct-09

[1]Source: Montgomery County, Department of General Services.

[2]Represents the costs for construction, planning design supervision, land and other miscellaneous costs. Source: Montgomery County, Department of General Services.

[3]Annual capital costs are assumed to be amortized over 20 years at 5%.

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Civic Green[1]

Costs Type	Total Capital Costs	Amortization Period[3]	First Year Amortized Costs[3]
Capital:			
Project construction, land and other costs[2]	$11,390,000	20	$913,963

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]5-E*
5-Oct-09

[1]Source: Montgomery County, Department of General Services.

[2]Represents the costs for construction, planning design supervision, land and other miscellaneous costs. Source: Montgomery County, Department of General Services.

[3]Annual capital costs are assumed to be amortized over 20 years at 5%.

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Montgomery County Public Schools[1]

Costs Type	Total Capital Costs	Amortization Period[4]	First Year Annual Costs
Capital:			
Elementary school building, design and construction[1]	$20,000,000	20	$1,604,852
Operating:			
Personnel[2]			$790,000
Operations[3]			$445,000
Total school costs			$2,839,852

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]6-F*
5-Oct-09

[1]Source: Montgomery County, Department of General Services.

[2]Source: Montgomery County Public School System. Represents annual maintenance personnel costs.

[3]Represents the costs for maintenance and energy. Source: Montgomery County Public School System.

[4]Annual costs are assumed to be amortized over 20 years at 5%.

White Flint
Montgomery County, Maryland

Projected County Annual Operating and Capital Costs - Montgomery County Department of Transportation[1]

Costs Type	Total Capital Costs[2] Stage 1 2014	Stage 2 2022	Stage 3 2029	Total	Amortization Period	First Year Annual Costs[3] Stage 1 2014	Stage 2 2022	Stage 3 2029
Arterials								
Randolph Road	$0	$5,043,158	$0	$5,043,158	30	$0	$328,065	$0
Business Street								
Woodglen Drive	$0	$9,919,800	$0	$9,919,800	30	$0	$645,297	$0
Huff Court	$0	$6,651,880	$0	$6,651,880	30	$0	$432,714	$0
Nebel Street Ext. (north)	$0	$6,126,561	$0	$6,126,561	30	$0	$398,542	$0
Executive Blvd. Ext (north)	$8,407,200	$0	$0	$8,407,200	30	$546,900	$0	$0
Chapman Avenue (Citadel Ave/Maple Ave)	$27,074,919	$0	$0	$27,074,919	30	$1,761,262	$0	$0
Security Lane	$0	$6,086,784	$0	$6,086,784	30	$0	$395,954	$0
Sub-total County road estimates	$35,482,119	$33,828,183	$0	$69,310,302		$2,308,163	$2,200,572	$0

MuniCap, Inc. *M:\CONSULTING\Montgomery County\White Flint\[White Flint Sector Plan 10.5.09.xls]7-G*
5-Oct-09

[1]Based on information provided by Montgomery County, Department of Transportation.

[2]Represents the capital costs assumed to occur within each stage of the development. Based on information provided by Montgomery County, Department of General Services.

[3]Annual costs are assumed to be amortized over 30 years at 5%.

White Flint
Montgomery County, Maryland

Total Projected County Operating and Capital Costs[1]

Year Ending	Tax Year Beginning	Inflation Factor	Aquatic Center (MAC)[2]	Department of Fire and Rescue Services[2] Operating	One-time	Capital Costs	Total	Upcountry Urban District[2]	Bus Depot[2]	Civic Green[2]
31-Dec-09	1-Jul-10	100%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-10	1-Jul-11	103%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-11	1-Jul-12	106%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-12	1-Jul-13	109%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-13	1-Jul-14	113%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-14	1-Jul-15	116%	$0	$1,003,152	$1,260,043	$2,020,889	$4,284,084	$1,916,616	$0	$0
31-Dec-15	1-Jul-16	119%	$0	$1,033,247	$0	$2,020,889	$3,054,136	$1,974,115	$0	$0
31-Dec-16	1-Jul-17	123%	$0	$1,064,244	$0	$2,020,889	$3,085,133	$2,033,338	$0	$0
31-Dec-17	1-Jul-18	127%	$0	$1,096,172	$0	$2,020,889	$3,117,061	$2,094,338	$0	$0
31-Dec-18	1-Jul-19	130%	$0	$1,129,057	$0	$2,020,889	$3,149,946	$2,157,168	$0	$0
31-Dec-19	1-Jul-20	134%	$0	$1,162,928	$0	$2,020,889	$3,183,818	$2,221,884	$0	$0
31-Dec-20	1-Jul-21	138%	$0	$1,197,816	$0	$2,020,889	$3,218,705	$2,288,540	$0	$0
31-Dec-21	1-Jul-22	143%	$0	$1,233,751	$0	$2,020,889	$3,254,640	$2,357,196	$0	$0
31-Dec-22	1-Jul-23	147%	$0	$1,270,763	$0	$2,020,889	$3,291,653	$2,427,912	$9,427,116	$1,342,186
31-Dec-23	1-Jul-24	151%	$0	$1,308,886	$0	$2,020,889	$3,329,775	$2,500,749	$9,427,116	$1,342,186
31-Dec-24	1-Jul-25	156%	$0	$1,348,153	$0	$2,020,889	$3,369,042	$2,575,772	$9,427,116	$1,342,186
31-Dec-25	1-Jul-26	160%	$0	$1,388,597	$0	$2,020,889	$3,409,487	$2,653,045	$9,427,116	$1,342,186
31-Dec-26	1-Jul-27	165%	$0	$1,430,255	$0	$2,020,889	$3,451,145	$2,732,636	$9,427,116	$1,342,186
31-Dec-27	1-Jul-28	170%	$0	$1,473,163	$0	$2,020,889	$3,494,052	$2,814,616	$9,427,116	$1,342,186
31-Dec-28	1-Jul-29	175%	$0	$1,517,358	$0	$2,020,889	$3,538,247	$2,899,054	$9,427,116	$1,342,186
31-Dec-29	1-Jul-30	181%	$2,768,719	$1,562,879	$0	$2,020,889	$3,583,768	$2,986,026	$9,427,116	$1,342,186
31-Dec-30	1-Jul-31	186%	$2,768,719	$1,609,765	$0	$2,020,889	$3,630,654	$3,075,606	$9,427,116	$1,342,186
31-Dec-31	1-Jul-32	192%	$2,768,719	$1,658,058	$0	$2,020,889	$3,678,947	$3,167,875	$9,427,116	$1,342,186
31-Dec-32	1-Jul-33	197%	$2,768,719	$1,707,800	$0	$2,020,889	$3,728,689	$3,262,911	$9,427,116	$1,342,186
31-Dec-33	1-Jul-34	203%	$2,768,719	$1,759,034	$0	$2,020,889	$3,779,923	$3,360,798	$9,427,116	$1,342,186
31-Dec-34	1-Jul-35	209%	$2,768,719	$1,811,805	$0	$0	$1,811,805	$3,461,622	$9,427,116	$1,342,186
31-Dec-35	1-Jul-36	216%	$2,768,719	$1,866,159	$0	$0	$1,866,159	$3,565,471	$9,427,116	$1,342,186
31-Dec-36	1-Jul-37	222%	$2,768,719	$1,922,144	$0	$0	$1,922,144	$3,672,435	$9,427,116	$1,342,186
31-Dec-37	1-Jul-38	229%	$2,768,719	$1,979,808	$0	$0	$1,979,808	$3,782,608	$9,427,116	$1,342,186
31-Dec-38	1-Jul-39	236%	$2,768,719	$2,039,202	$0	$0	$2,039,202	$3,896,086	$9,427,116	$1,342,186
31-Dec-39	1-Jul-40	243%	$2,768,719	$2,100,378	$0	$0	$2,100,378	$4,012,969	$9,427,116	$1,342,186
31-Dec-40	1-Jul-41	250%	$2,768,719	$2,163,390	$0	$0	$2,163,390	$4,133,358	$9,427,116	$1,342,186
31-Dec-41	1-Jul-42	258%	$2,768,719	$2,228,291	$0	$0	$2,228,291	$4,257,359	$9,427,116	$1,342,186
31-Dec-42	1-Jul-43	265%	$2,768,719	$2,295,140	$0	$0	$2,295,140	$4,385,079	$0	$0
31-Dec-43	1-Jul-44	273%	$2,768,719	$2,363,994	$0	$0	$2,363,994	$4,516,632	$0	$0
31-Dec-44	1-Jul-45	281%	$2,768,719	$2,434,914	$0	$0	$2,434,914	$4,652,131	$0	$0
31-Dec-45	1-Jul-46	290%	$2,768,719	$2,507,961	$0	$0	$2,507,961	$4,791,695	$0	$0
31-Dec-46	1-Jul-47	299%	$2,768,719	$2,583,200	$0	$0	$2,583,200	$4,935,445	$0	$0
31-Dec-47	1-Jul-48	307%	$2,768,719	$2,660,696	$0	$0	$2,660,696	$5,083,509	$0	$0
31-Dec-48	1-Jul-49	317%	$2,768,719	$2,740,517	$0	$0	$2,740,517	$5,236,014	$0	$0
31-Dec-49	1-Jul-50	326%	$0	$2,822,733	$0	$0	$2,822,733	$5,393,094	$0	$0
Total			$55,374,381	$63,475,410	$1,260,043	$40,417,783	$105,153,236	$121,275,702	$188,542,311	$26,843,712

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[1]Capital costs are assumed to increase with inflation. For costs that are assumed to be financed with bonds or other long-term financing vehicles, total inflated costs are assumed to be amortized at a 5% and do not increase on an annual basis. Staging provided by Montgomery County, Department of General Services.

[2]See previous schedules.

White Flint
Montgomery County, Maryland

Total Projected County Operating and Capital Costs, continued[1]

Year Ending	Tax Year Beginning	Inflation Factor	Public School Operating and Capital Costs[2] Operating Costs	Amortized Capital Costs	Total School Costs	Department of Transportation[2] County Road Amortized Costs Stage 1	Stage 2	Stage 3	Total DOT	Total Projected Capital Costs
31-Dec-09	1-Jul-10	100%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-10	1-Jul-11	103%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-11	1-Jul-12	106%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-12	1-Jul-13	109%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-13	1-Jul-14	113%	$0	$0	$0	$0	$0	$0	$0	$0
31-Dec-14	1-Jul-15	116%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$8,876,494
31-Dec-15	1-Jul-16	119%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$7,704,044
31-Dec-16	1-Jul-17	123%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$7,794,265
31-Dec-17	1-Jul-18	127%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$7,887,192
31-Dec-18	1-Jul-19	130%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$7,982,908
31-Dec-19	1-Jul-20	134%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$8,081,494
31-Dec-20	1-Jul-21	138%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$8,183,039
31-Dec-21	1-Jul-22	143%	$0	$0	$0	$2,675,793	$0	$0	$2,675,793	$8,287,629
31-Dec-22	1-Jul-23	147%	$1,813,639	$2,356,779	$4,170,418	$2,675,793	$3,231,614	$0	$5,907,407	$26,566,691
31-Dec-23	1-Jul-24	151%	$1,868,048	$2,356,779	$4,224,827	$2,675,793	$3,231,614	$0	$5,907,407	$26,732,060
31-Dec-24	1-Jul-25	156%	$1,924,090	$2,356,779	$4,280,869	$2,675,793	$3,231,614	$0	$5,907,407	$26,902,391
31-Dec-25	1-Jul-26	160%	$1,981,812	$2,356,779	$4,338,591	$2,675,793	$3,231,614	$0	$5,907,407	$27,077,831
31-Dec-26	1-Jul-27	165%	$2,041,267	$2,356,779	$4,398,046	$2,675,793	$3,231,614	$0	$5,907,407	$27,258,535
31-Dec-27	1-Jul-28	170%	$2,102,505	$2,356,779	$4,459,284	$2,675,793	$3,231,614	$0	$5,907,407	$27,444,660
31-Dec-28	1-Jul-29	175%	$2,165,580	$2,356,779	$4,522,359	$2,675,793	$3,231,614	$0	$5,907,407	$27,636,368
31-Dec-29	1-Jul-30	181%	$2,230,547	$2,356,779	$4,587,326	$2,675,793	$3,231,614	$0	$5,907,407	$30,602,547
31-Dec-30	1-Jul-31	186%	$2,297,464	$2,356,779	$4,654,243	$2,675,793	$3,231,614	$0	$5,907,407	$30,805,931
31-Dec-31	1-Jul-32	192%	$2,366,388	$2,356,779	$4,723,167	$2,675,793	$3,231,614	$0	$5,907,407	$31,015,416
31-Dec-32	1-Jul-33	197%	$2,437,379	$2,356,779	$4,794,158	$2,675,793	$3,231,614	$0	$5,907,407	$31,231,185
31-Dec-33	1-Jul-34	203%	$2,510,501	$2,356,779	$4,867,280	$2,675,793	$3,231,614	$0	$5,907,407	$31,453,428
31-Dec-34	1-Jul-35	209%	$2,585,816	$2,356,779	$4,942,595	$2,675,793	$3,231,614	$0	$5,907,407	$29,661,449
31-Dec-35	1-Jul-36	216%	$2,663,390	$2,356,779	$5,020,169	$2,675,793	$3,231,614	$0	$5,907,407	$29,897,226
31-Dec-36	1-Jul-37	222%	$2,743,292	$2,356,779	$5,100,071	$2,675,793	$3,231,614	$0	$5,907,407	$30,140,077
31-Dec-37	1-Jul-38	229%	$2,825,591	$2,356,779	$5,182,370	$2,675,793	$3,231,614	$0	$5,907,407	$30,390,213
31-Dec-38	1-Jul-39	236%	$2,910,358	$2,356,779	$5,267,137	$2,675,793	$3,231,614	$0	$5,907,407	$30,647,853
31-Dec-39	1-Jul-40	243%	$2,997,669	$2,356,779	$5,354,448	$2,675,793	$3,231,614	$0	$5,907,407	$30,913,222
31-Dec-40	1-Jul-41	250%	$3,087,599	$2,356,779	$5,444,378	$2,675,793	$3,231,614	$0	$5,907,407	$31,186,553
31-Dec-41	1-Jul-42	258%	$3,180,227	$2,356,779	$5,537,006	$2,675,793	$3,231,614	$0	$5,907,407	$31,468,083
31-Dec-42	1-Jul-43	265%	$3,275,634	$0	$3,275,634	$2,675,793	$3,231,614	$0	$5,907,407	$18,631,980
31-Dec-43	1-Jul-44	273%	$3,373,903	$0	$3,373,903	$2,675,793	$3,231,614	$0	$5,907,407	$18,930,655
31-Dec-44	1-Jul-45	281%	$3,475,120	$0	$3,475,120	$0	$3,231,614	$0	$3,231,614	$16,562,498
31-Dec-45	1-Jul-46	290%	$3,579,374	$0	$3,579,374	$0	$3,231,614	$0	$3,231,614	$16,879,363
31-Dec-46	1-Jul-47	299%	$3,686,755	$0	$3,686,755	$0	$3,231,614	$0	$3,231,614	$17,205,734
31-Dec-47	1-Jul-48	307%	$3,797,358	$0	$3,797,358	$0	$3,231,614	$0	$3,231,614	$17,541,896
31-Dec-48	1-Jul-49	317%	$3,911,278	$0	$3,911,278	$0	$3,231,614	$0	$3,231,614	$17,888,142
31-Dec-49	1-Jul-50	326%	$4,028,617	$0	$4,028,617	$0	$3,231,614	$0	$3,231,614	$15,476,058
Total			$77,861,201	$47,135,578	$124,996,779	$80,273,797	$90,485,191	$0	$170,758,988	$792,945,109

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[1]Capital costs are assumed to increase with inflation. For costs that are assumed to be financed with bonds or other long-term financing vehicles, total inflated costs are assumed to be amortized at a 5% and do not increase on an annual basis. Staging provided by Montgomery County, Department of General Services.

[2]See previous schedules.

White Flint
Montgomery County, Maryland

Net Revenues Versus Total Projected County Operating and Capital Costs

Tax Year Beginning	Inflation Factor	Net County Revenues	Total Projected County Operating & Capital Costs	Net Montgomery County Surplus/(Deficit)
1-Jul-10	100%	$0	$0	$0
1-Jul-11	103%	$7,163,136	$0	$7,163,136
1-Jul-12	106%	$12,981,069	$0	$12,981,069
1-Jul-13	109%	$19,007,729	$0	$19,007,729
1-Jul-14	113%	$25,392,455	$0	$25,392,455
1-Jul-15	116%	$32,150,992	($8,876,494)	$23,274,498
1-Jul-16	119%	$37,833,730	($7,704,044)	$30,129,686
1-Jul-17	123%	$44,122,901	($7,794,265)	$36,328,637
1-Jul-18	127%	$50,761,441	($7,887,192)	$42,874,249
1-Jul-19	130%	$57,764,339	($7,982,908)	$49,781,431
1-Jul-20	134%	$65,147,159	($8,081,494)	$57,065,664
1-Jul-21	138%	$72,926,056	($8,183,039)	$64,743,017
1-Jul-22	143%	$81,117,801	($8,287,629)	$72,830,171
1-Jul-23	147%	$89,739,797	($26,566,691)	$63,173,106
1-Jul-24	151%	$98,810,106	($26,732,060)	$72,078,045
1-Jul-25	156%	$108,347,468	($26,902,391)	$81,445,077
1-Jul-26	160%	$118,371,327	($27,077,831)	$91,293,496
1-Jul-27	165%	$128,901,853	($27,258,535)	$101,643,318
1-Jul-28	170%	$139,959,967	($27,444,660)	$112,515,307
1-Jul-29	175%	$151,567,369	($27,636,368)	$123,931,000
1-Jul-30	181%	$163,746,559	($30,602,547)	$133,144,012
1-Jul-31	186%	$176,520,871	($30,805,931)	$145,714,940
1-Jul-32	192%	$189,914,493	($31,015,416)	$158,899,078
1-Jul-33	197%	$203,952,504	($31,231,185)	$172,721,319
1-Jul-34	203%	$218,660,896	($31,453,428)	$187,207,468
1-Jul-35	209%	$234,066,607	($29,661,449)	$204,405,158
1-Jul-36	216%	$250,197,553	($29,897,226)	$220,300,327
1-Jul-37	222%	$267,082,661	($30,140,077)	$236,942,585
1-Jul-38	229%	$284,751,898	($30,390,213)	$254,361,685
1-Jul-39	236%	$303,236,306	($30,647,853)	$272,588,453
1-Jul-40	243%	$322,568,040	($30,913,222)	$291,654,817
1-Jul-41	250%	$327,437,018	($31,186,553)	$296,250,465
1-Jul-42	258%	$337,276,917	($31,468,083)	$305,808,834
1-Jul-43	265%	$347,404,072	($18,631,980)	$328,772,092
1-Jul-44	273%	$357,826,616	($18,930,655)	$338,895,961
1-Jul-45	281%	$368,552,899	($16,562,498)	$351,990,402
1-Jul-46	290%	$379,591,489	($16,879,363)	$362,712,126
1-Jul-47	299%	$390,951,176	($17,205,734)	$373,745,443
1-Jul-48	307%	$402,640,982	($17,541,896)	$385,099,087
1-Jul-49	317%	$414,670,160	($17,888,142)	$396,782,018
1-Jul-50	326%	$427,048,202	($15,476,058)	$411,572,144
Total		$7,710,164,615	($792,945,109)	$6,917,219,506

Executive Departments Technical Comments on the draft White Flint Sector Plan

These technical comments are provided in connection with the County Executive's memorandum to Council President Andrews on the White Flint Sector Plan. The Executive Branch Departments have reviewed the Planning Board Draft of the White Flint Sector Plan and have provided comments that we hope will clarify and strengthen the objectives of the Draft Plan. Executive staff will be available to discuss these suggestions as the County Council reviews the Plan. We look forward to working with Planning Staff and the County Council on this Plan.

Department of Fire and Rescue Services

Joint Fire Station/Police Substation

MCFRS supports the recommendation on page 64 for locating a new fire-rescue station in the White Flint area on the excess right-of-way for the Montrose Parkway owned by the State Highway Administration (SHA); however, the station should go on the south side of the excess right-of-way and not on the north side as proposed. MCFRS recommends relocating Fire Station 23 – presently located at 121 Rollins Avenue near Rockville Pike – further south along the Rockville Pike corridor. The proposed siting of Station 23 would allow for the construction of a fire station that would not only accommodate existing Station 23 apparatus (i.e., two EMS units, engine, aerial tower) and personnel but also additional apparatus (e.g., third EMS unit) and personnel that will be needed to serve the expanding needs of the White Flint, Twinbrook, South Rockville, and North Bethesda areas. The relocation of the station to the White Flint area at the location recommended by MCFRS would place a larger number of existing and future residents and property within 6-minutes of Station 23 than is the case currently. The relocation of Station 23 would also aid in reducing the gap in 6-minute response coverage in North Bethesda along the Rockville Pike corridor – an area that units located at existing Stations 23, 5, 20, and 26 cannot reach within the County's 6-minute response time goal.

A site immediately south of the future Montrose Parkway within the "Mid-Pike District" would meet MCFRS requirements– and place the fire station at a location where its resources would have immediate access to Rockville Pike (northbound and southbound), Montrose Parkway, Montrose Road, Randolph Road, and Old Georgetown Road; thus providing quick access in all directions along major north-south and east-west thoroughfares.

As for the recommendation on page 64 to co-locate a Montgomery County Police (MCP) substation with the fire station, MCFRS supports the proposal provided that space requirements for the MCP sub-station do not reduce or supersede MCFRS' space requirements for the fire station with respect to the specific site that would be identified for joint MCFRS-MCP use. Likewise, I support the inclusion of the joint MCFRS/MCP station in the first phase of CIP projects as shown in the CIP chart on page 75.

Fire-Rescue and Law Enforcement Services

Regarding the narrative on page 64 under the heading "Fire, Rescue and Emergency Medical Services," Kensington Station 5, located on Connecticut Avenue and Plyers Mill Road,

should also be included in the second sentence. In addition, the "Public Safety" section on page 64 addresses the need for a police substation; therefore the section should be titled "Law Enforcement" as "public safety" encompasses all elements of public safety (i.e., fire, rescue, EMS, and law enforcement); not law enforcement alone.

Fire Department Access

The plan's vision (p. 8) references a proposed street grid - further described under "Mobility" (pp. 19 and 52) and shown in Figure 43 (p. 53) - that would improve connectivity and access to and within the White Flint area. MCFRS supports the proposed street grid as it would provide alternate routes of travel for MCFRS apparatus to incidents. Conspicuously absent from the mobility discussion, however, is information on emergency vehicle access. Provided that streets within the White Flint area meet County Road Code requirements, emergency services access requirements would be met.

Speed Limit's Impact on Response Time

Re-creating Rockville Pike as a boulevard and promenade (pp. 19, 20, 53-55) with a slower target speed and greater congestion would slow traffic movement throughout the White Flint area adversely affecting response time of emergency vehicles along the area's predominant north-south thoroughfare.

Urban Design

The "White Flint Urban Design Guidelines" referenced on pages 17, 28 and 53 of the plan does not include specifics regarding roadway cross-sections, building setbacks, building façades, siting of trees near buildings, and other design elements that affect fire department access. MCFRS assumes these elements will be addressed in the actual Design Guidelines for which MCFRS should be given the opportunity to provide input.

Sustainability

Sustainability is defined on page 25 as "meeting the needs of the present without compromising the ability of future generations to meet their own needs." Environmental sustainability receives considerable attention in this draft plan while other aspects of sustainability receive little or no attention. All aspects of sustainability should be addressed adequately in the plan, including sustainable building construction, the need for various services in an aging community, and planning for changing demographics, among other elements of sustainability identified on page 25.

Montgomery County Department of Transportation

Plan Background and Transportation Planning Philosophy

The White Flint Sector Plan envisions a dense urban center where people live, work, and shop, relying heavily on walking, Metrorail and buses to do so. The plan capitalizes on the sector plan's location at Metro and along Rockville Pike to make sweeping recommendations for the creation of a high density, compact urban center, complete with mixed-use high rises along a pedestrian and transit-friendly Rockville Pike.

The transportation planning philosophy inherent in the White Flint Plan marks a significant departure from prior Master Plans. Previously, transportation capacity as measured by trip generation and CLV served as the driver for the development of Master Plan land use scenarios. The White Flint Plan instead sets a goal for a transit-focused, multi-modal mobility system to support an urban center, and develops transportation assumptions to support that vision. The two principles underpinning the "mobility recommendations" are:

1) An enhanced grid street network will diffuse congestion for local and through traffic.
2) Walkable streets with access to transit reduce reliance on the automobile.

In applying these principles shifting the focus to Transportation Demand Management, the Planning Board is moving away from the capacity- focused principles which have been used to link growth with public facilities in Montgomery County and redefining the balance between transportation and land use.

LATR/PAMR/APFO & White Flint

LATR

In an effort to align the Plan with the existing growth management policy, the plans proposed for White Flint assert that LATR standards can be met with a proposed expansion of the Metro Station Policy Area (MSPA) boundaries to the entire Plan area. This recommendation has been an assumption in the plan all along, in effect acknowledging that as the planned level of development builds out, congestion in the White Flint will exceed levels currently allowed in the area. Expanding the MSPA boundaries permits the higher level of congestion to occur because of the unique nature of the area. This action will serve to set higher levels of acceptable congestion at intersections which will enable developments to pass LATR review with less mitigation. Even with the higher threshold of acceptable congestion, two intersections remain slightly out of balance during the PM peak.

These intersections are MD 355 and Old Georgetown Road (1830), and Old Georgetown Road and Executive Boulevard (1800). It is important to note that MNCPPC transportation analysis of previous iterations of the Plan indicated up to 12 failing intersections.

PAMR

The PAMR analysis rests on the assumption that the current PAMR Standards can be changed and lowered for the White Flint Plan. The PAMR analysis includes the entire North Bethesda / Garrett Park Policy Area. The Growth Policy requires that all Policy Areas have a

Relative Arterial Mobility of at least 40% or LOS D conditions, regardless of the level of transit service provided. The White Flint Plan and the Planning Board Draft of the Growth Policy both recommend the removal of this requirement. The Plan supports returning to the Planning Board's original recommendation which automatically assumes a passing automobile level of service in areas where transit service is high. The Plan must make this change because it projects a level of Relative Arterial Mobility (RAM) of 37%, which fails to meet the 40% RAM requirement. Required and Projected RAM and Relative Transit Mobility Levels are displayed below:

	Arterial RAM	Transit RTM
Required:	40% LOS D	N/A
White Flint Plan:	37% LOS E	77% LOS B

During the development of the 2007 Growth Policy there was extensive discussion at Council opposing this concept. Council members strongly opposed measuring automobile congestion as a function of transit, and strongly supported establishing a floor for automobile LOS. CE testimony during the Growth Policy review also rejected the Planning Board's proposal. The White Flint Plan resurrects this discarded notion.

The White Flint Plan assumes that the Policy Area can support the higher congestion levels only if the current policy is changed. It is important to note in this context the objections to the previous Growth Policies that were full of exceptions. Discontent with the old exception-filled Growth Policies on the part of governmental, community, and business community stakeholders was one of the main drivers behind the effort to revamp the Growth Policy in 2007.

In order to justify the LATR and PAMR recommendations outlined above, the Planning Board makes the following assumptions regarding trip generation:

- Development in MSPAS generates fewer automobile trips. (This is already taken into account in the modeling).

- Transportation Demand Management strategies will enable future development in White Flint to generate even lower numbers of vehicle trips than in other MSPAs. The non-auto driver mode share in White Flint is set at an ambitious 39% rate. (The current rate is 26%.).

- The increased density in the plan reflects a shift toward more residential development in the area. Residential development generates fewer trips than commercial development.

Finally, the plan recommends creation of a new public facility review procedure applicable to all development in the White Flint Sector Plan Area. Such a procedure is yet to be fully defined. Any new public facility review procedure could result in development projects causing localized congestion. These issues should be identified through LATR and requirements placed on projects to mitigate this congestion. Failure to implement LATR tests could result in very high levels of congestion on major arterials that serve not only the specific MSPA but also serve large volumes of traffic. Skipping LATR in favor of an as yet to be defined public facility

review procedure could also cause an increase in cut-through traffic in existing adjacent neighborhoods.

Big Picture Issues

The Planning Board's land use and zoning recommendations produce a much higher density than that currently Master-Planned for White Flint. Significant transportation infrastructure and transportation policy changes intended to support the intensely higher land use are proposed. The plan relies heavily on a 39% transit modal split, a redesign of Rockville Pike, a second entrance to the White Flint Metro, and the construction of a street grid to support the intense level of housing and job growth.

The draft plan reflects a departure from longstanding elements for measurement of land use/transportation balance. The key big-picture questions which must be answered to achieve land use/transportation balance in the face of the vastly expanded planned new growth are listed below:

Land Use / Transportation Balance

Can a plan which relies on a fundamental shift in the measurement and projection of transportation capacity and demand achieve balance? Several factors contribute to this planning shift away from balance. Taken individually, any single one of these factors might be acceptable. However, the cumulative effect is to minimize the "on the ground" impact of congestion in the Sector Plan and surrounding areas. Factors eroding balance are listed below:

a. Trip generation rates are substantially lower than those used for in prior plans. Use of these lower rates is justified by the shift toward residential development. This may be sufficient for land use within ¼ mile from the metro station, but the trip generation rate should be higher for development located between ¼ and ½ mile from the Metro. The trip generation rate should increase once again for development ½ mile and further from the Metro station.

b. The assumed Non-Auto Driver Mode Share of 39% is ambitious and possibly unrealistic, given the current 26% rate.

c. The Expansion of the Metro Station Policy Area Boundary to include the entire sector plan area permits much higher levels of congestion well beyond the customary ½ mile radius from Metro.

d. The Plan assumes that two intersections will fail LATR by a small amount. This could have the effect of extending the period of congestion. A plan that allows two failing intersections may extend the congestion for more hours. Furthermore, congestion in adjacent neighborhoods will increase due to cut-through traffic. Finally, the Plan's goals for Rockville Pike include counting on reduced traffic in the off-peak to allow for parking. It means that congestion could be increased further if, as the plan recommends, people can parallel park on the pike during the off-peak hours. The development community feels strongly about allowing the parallel parking. This is an operational issue that may not be realistic.

e. The Plan fails under the existing PAMR Review. The Board addresses this by reiterating its support for the Planning Board's 2007 recommendation that automatically assumes sufficient automobile mobility where transit service is LOS B or better.

2. Modal Split
   Is the modal split realistic? What happens to through and local traffic if it is not? It appears that there is an over-reliance on TDM.

3. Funding
   Will the transportation improvements be funded as expected by private and public participants?

4. Implementation
   Can the transportation improvements be implemented as expected by private and public participants? Will the timing of the infrastructure coincide with the related development?

5. Staging
   Will the staging of development and infrastructure be *binding*?

6. Rockville Pike
   Is the redesign of Rockville Pike, a state road, adjacent to the Metro implementable? This project is viewed as key to the plan. A realistic plan to achieve the redesign is critical.

Transportation Policy Recommendations:

1. In order to support the recommended increases in jobs and housing, the Plan relies largely on acceptance of higher levels of congestion in the area, as well as more expansive Transportation Demand Management and monitoring than that employed and funded in Montgomery County to date. Non-SOV mode share increases from 26 percent to 39 percent. A 25% increase in the NADMS goal to about 33%, could serve as a more realistic modal split goal. A reduced modal split goal would presumably figure into the transportation analysis. This would necessitate a reduction in the amount of allowable development to a more supportable level OR an increase in proposed transportation improvements to support the new level of development.

   The suggested TDM strategies are unlikely to achieve the 39 % non-auto driver mode share goal. Other possible measures that have been used in Traffic Mitigation Agreements (such as live/work financial incentives, transit fare buy downs, carpool and vanpool spaces, Flex car spaces, bike racks, flexible work hours, work from home, guaranteed ride home programs, etc.) should be considered. These measures should be long-term (not limited to 12 years).

   A 39% mode split is achievable in places where there are numerous high-quality, high volume, high-frequency transit services intersecting with one another, such

as in CBDs like Bethesda and Silver Spring where the Purple Line will intersect with the Red Line. White Flint will have the Red Line, but it won't have any intersecting high quality transit service. In addition, the Red Line turns back at Grosvenor Station during the peak periods, and there is little likelihood for this to change in over 20 years because of Metro/MD budget constraints. As a result White Flint has one-half of the Red Line service (Capacity) than does either Bethesda or Silver Spring. Red Line capacity may be a very limiting condition that is not adequately addressed in the White Flint Plan.

Even the MARC Brunswick Line, if a station is ever approved for White Flint, is far away from White Flint Metro, unlike in Silver Spring where a Transit Center unifying Metro, MARC and transit bus service make 39% achievable. MCDOT believes that 33% is simply more realistic for an area like White Flint which is a tier below Bethesda or Silver Spring on the transit service scale. A refinement in staging won't change this fact.

2. The key to successful TDM is the monitoring and strict enforcement of the achievement of results. Whereas we believe 39% is ambitious, there are triggering mechanisms in the Plan that must be adopted and monitored as part of the Plan in order to reduce the possibility of widespread congestion. Absent the strict monitoring, and compliance with the triggering DOT would oppose this goal. With the monitoring in place, final stages of development will not occur unless the triggering model splits are met; and therefore the goal of 39% is acceptable as an end stage. Again, the success of the TDM strategies should be tied, monitored and enforced to the staging in the Plan.

3. We oppose the creation of a new public facility review procedure applicable to all development in the White Flint Sector Plan Area

4. MCDOT supports binding, realistic staging with firm triggers.

MCDOT recommends the addition of actual infrastructure completion requirements prior to the release of the 3,000 dwelling units and 2.0 million square feet of nonresidential development released at the *beginning* of Phase I. MCDOT notes that ***not one*** infrastructure requirement is scheduled to be completed before the 3,000 additional dwelling units and 2.0 million additional square feet of non-residential development are released.

5. MCDOT *recommends t*he addition of actual infrastructure completion requirements during Phase I, prior to the release of another additional 3,000 dwelling units and 2.0 million square feet of nonresidential development released for Phase I

    a. No actual infrastructure improvements are required to proceed to Phase II. The Phase II requirements do not require anything to be built to support the additional density. Requirements include
        i. Contracts for construction of two streets
        ii. Funding of streetscape improvements, sidewalks and bikeways
        iii. Completion of a design study for Rockville Pike
        iv. Establishment of a bus circulator system
        v. Achievement of achievement of 30% NADMS.

Project Specific Comments: Transit

1. Second Entrance to the White Flint Metro: MCDOT recommends expediting design, funding and construction of this critical project further than the Plan currently recommends. The station is to be located in the southeast quadrant of Rockville Pike and Old Georgetown Road. It is expected to be a public project. Construction of this entrance is critical to support the proposed new development. Specifically, MCDOT recommends:

    a. Accelerating the funding of the design of the second Metrorail station entrance to Stage 1.

    b. Accelerating the construction of the second Metrorail station entrance to Stage 2.

2. Construction of an additional MARC Station: MCDOT requests further clarification of this recommendation. CSX has made it clear that a new MARC station is a non-starter unless an existing station is closed. The plan does not explain which existing station should be closed to allow this new station to open. The plan should address this issue.

3. Future Use of the Existing Ride On Bus Maintenance Facility:

    a. The Plan includes statements about the future use of the existing Ride On bus maintenance facility. MCDOT will have to determine the future Ride On plans for this facility and whether it will be needed in the future.

    b. Page 48, Block 3, Nicholson Court. Correct erroneous references to "Ride On bus parking facility." The Plan refers to this area as a "Ride On bus parking facility" and mentions "combining Ride On bus storage and MARC parking facilities." In fact, this is Ride On's Nicholson Depot, essential for bus operations at least until the North County Depot is completed.

4. Street Network

    a. MCDOT supports the multi-modal system outlined in the plan. The enhancement to the street network is designed to fully utilize transit service which would provide incentives to reduce automobile usage.

    b. MCDOT notes that the street network should be wide enough to accommodate buses that traverse through the neighborhoods. A standard 40 ft bus would require at a minimum 12 ft lanes.

5. BRT: MCDOT supports BRT and bus priority treatments.

    a. MCDOT supports a BRT study to incorporate all major corridors in the county for better connectivity.

    b. MCDOT suggests that Bus Rapid Transit (BRT) is not feasible in the Sector Plan Area given the short intersection spacing, and the short travel length

within the Sector Plan area. Successful BRTs cover long multi-mile corridors, have infrequent stops and require extensive and expensive through route infrastructures. The White Flint Sector Plan alone cannot justify BRT.

c. MCDOT supports Examination of bus priority treatments for east-west routes along Montrose Parkway.

d. MCDOT emphasizes once again that the street network should be wide enough to accommodate buses that traverse through the neighborhoods, which requires at a minimum 12 ft lanes.

e. Transit staff supports reconstruction of bus priority lanes located to balance the needs for Metrorail feeder along Rockville Pike.

6. North Bethesda TMD
The Sector Plan should acknowledge North Bethesda TMD and its role in achieving mode share goals. This plan calls for increasing levels of aggressive NADMS, from 30 percent in Phase 1 to 39 percent in Phase 3. The North Bethesda Transportation Management District (TMD) is key to achieving these goals. Yet there is no mention at any point in the plan of the TMD or the important role it must play in achieving those goals. There is just one passing reference (page 52) to "the County's commitment to transportation demand management strategies," but no discussion is included as to how those strategies may impact achievement of the mode share goals.

7. Developer Cooperation with the TMD
The Sector Plan should acknowledge need for developer cooperation with the TMD and for Traffic Mitigation Agreements. There is no discussion of the need to ensure that development approvals are contingent on developer cooperation with the TMD in achieving the mode share goals. Currently developers are required by the conditions of approval to take certain actions to cooperate with the TMD – many of which are established through the required execution of Traffic Mitigation Agreements. Without these requirements many of the efforts of the TMD and others may be thwarted by developers and their tenants, making achievement of the mode share goals that much more difficult. The plan must make it clear that successful Transportation Demand Management (TDM) requires active, ongoing participation by the development community, employers, residents, and all others occupying their buildings.

8. TMD: Clarification of Mode Share Goals
   a. Mode share goals must be clarified. Do the Plan's mode share goals apply only to non-residential development, or to residential and non-residential development? Are they targeted at peak period only or overall?

   b. The Master Plan for the North Bethesda Planning Area, of which White Flint is a part, established separate peak period mode share goals for residential as well as non-residential development. The North Bethesda TMD was created by Council resolution with the objective of achieving both residential and non-residential mode share goals. By not addressing these goals clearly in the

White Flint Sector the traffic mitigation objectives of the North Bethesda Master Plan, the White Flint Sector Plan, and the TMD may be frustrated.

c. Since 60 percent of the new development in White Flint is to be residential, to leave residential development out of the traffic mitigation efforts would place an even greater burden on non-residential development to achieve the reduced levels of traffic congestion desired.

9. Transit Store
Page 65: Eliminate recommendation to create a "transit store." The discussion about the Satellite Regional Services Center includes a listing of the facilities to be included. These include a "transit store." The need for future "transit stores" is far from certain, given shifting paradigms for transit fare systems. The operational requirements for these essentially retail functions can be quite demanding of resources. This provision should be removed. Provision of office space for TMD operations in an office development somewhere within the core area of White Flint would be a more helpful requirement.

10. Shuttle Buses and Circulator Bus Routes
MCDOT supports the development of circulator bus routes to provide local service on the east and west cross streets. MCDOT has some concerns regarding the implementation and funding of these services.

The plan calls for "shuttle bus services serving both the Sector Plan area and immediately adjacent commercial properties"; and for "circulator bus routes to provide local service, particularly on the east and west cross streets."

a. While they can play a useful role in some settings, local circulators and shuttles can be very costly to operate and can in some cases operate at cross-purposes.

b. Development within the Sector Plan area should not be contingent on public sector operation of such shuttles/circulators unless a permanent source of funding for them can be provided and their operation can be planned in such a way as not to diminish the operations of public transit in the area.

c. MCDOT requests greater understanding regarding the recommended transit circulator route, including where it should run and who is served.

11. WMATA Bus Garage: MCDOT strongly recommends that the plan assume the retention of the Metrobus facility and that any FAR that is transferred be used to fund the new station entrance and other transit improvements.

a. The WMATA site (bus garage) has the greatest potential for future redevelopment and could add a substantial amount of residential uses should the bus facility no longer be needed. If the bus facility remains, the property may be appropriate to transfer density to properties along Rockville Pike.

Project Specific Comments: Roads

1. Elimination of a section of Executive Boulevard: The draft appears to eliminate a section of Executive Boulevard from Marinelli Road to Old Georgetown Road. MCDOT opposes this, and supports retention of this important existing roadway which not only provides access to such places as the Aquatic Center and Conference Center, but also provides mobility within the planning area. To eliminate a functioning segment of the already master planned transportation public infrastructure seems wasteful, especially given the abandonment processes, utility relocations, vehicular and pedestrian re-routings, and other accompanying actions such elimination will necessitate. If the road is to be eliminated the draft needs to include a more detailed drawing of the replacement "Mid-Pike Spine Street" R/W in relation to the Conference Center building, because it appears that the two would conflict.

2. Executive Boulevard – A segment of Executive Boulevard is proposed to be eliminated in the plan because it has "suburban" characteristics that would disrupt the more urban grid pattern that the plan is trying to achieve. MCDOT opposes this elimination, and urges retention of Executive Boulevard as it exists for all the reasons given in our comments - retention of this important existing roadway not only provides access to such places as the Aquatic Center and Conference Center, but also provides mobility within the planning area; to eliminate a functioning segment of the already master planned transportation public infrastructure seems wasteful, especially given the abandonment processes, utility relocations, vehicular and pedestrian re-routings, and other accompanying disruptions such elimination will necessitate. Retention of that segment of Executive Boulevard in the plan would cause a modification to the urban grid pattern in the Metro West District, and would cause a reassessment of the intersection of Old Georgetown Road (MD 187), Executive Boulevard, and "Old " Old Georgetown Road (aka Hoya Street) extended.

3. Market Street and Promenade: Implementation
   On page 55, the plan recommends initiating a CIP project to identify the alignment and cross-section for Market Street. This should be a MNCPPC planning initiative. It should only be a DOT Facility Planning Study if the intent is to have it be constructed under a CIP project. MCDOT notes that the plan language implies implementation through a private road club.

4. MD 355:
   The plan recommends reconstruction of MD 355 to improve pedestrian access and comfort, increase pervious area, and facilitate BRT treatments. The Plan envisions Rockville Pike within the Sector Plan area as a wider, more pedestrian friendly road with:
   - Additional right-of-way
   - A wide landscaped median
   - 3 through lanes
   - A new, separate curb lane designed for bus-priority treatment during peak periods. This lane may be supplemented with off-peak period parking should adjacent land uses require parking.
   - Wider sidewalks, provisions for bicyclists, tree panels, extensive landscaping and street furniture.

5. MCDOT comments and concerns regarding MD 355 include:

    a. The Plan must recognize that MD 355 serves a regional purpose to which there are no alternatives. Demand for regional travel along the Pike is only going to increase. A major traffic generator is developing just south of the Policy Area as Bethesda Naval Hospital expands under BRAC.

    b. There must be a balance between travel speeds on major thoroughfares and the frequency and spacing of pedestrian crossings. A wider pike will be harder for pedestrians to cross. Shorter blocks and more signals will slow down the through traffic.

    c. MSHA will need to accept the changes to the Pike.

    d. MD 355 must be constructed as one project segment. The widening of MD 355 would need to be continuous over the entire sector plan to allow the plans recommended pedestrian and bike enhancements.

    e. The ROW expansion may encroach on the Red Line easement and will be subject to Metro analysis.

    f. MCDOT supports wider ROW for priority bus lanes

6. <u>Montrose Parkway</u>
   MCDOT recommends that the Plan specifically reference the park and ride facility planned for any future surplus MDOT property from the Montrose Interchange.

    a. Page 43 – reference is made on what to do with any surplus MDOT property from the Montrose Interchange project and it is our understanding that this property is to be used as a park and ride facility. This facility is being funded with federal and state aid. The park and ride facility may be in conflict with the proposed fire/police facility.

    b. MCDOT strongly opposes any loss of the park and ride function; if the land is to be used for other public uses then the park and ride function (including no net loss of spaces) must also be preserved. Also, if the public uses cause negative impacts to the SWM function, then the plan must also proactively address a solution to the potential conflict it calls for.

7. <u>Nebel Street</u>
   The recommendation to construct Nebel Street as a 3-lane roadway contradicts the latest PDF and DTE Project Status reports. Both reports call for Nebel Street to be a 4 lane closed section business district road. In any case, recommended lane use and location of pedestrian refuge islands are operational and not appropriate for a Sector Plan document. Those comments should be deleted from the Sector Plan.

8. Old Georgetown Road:
   The draft calls for an extended/expanded "Old" Old Georgetown Road as a four lane divided Major Highway intersecting with Old Georgetown Road at Executive Boulevard. It also calls for existing Old Georgetown Road from Executive Boulevard to MD 355 to be reduced from its existing six lane configuration to a four lane divided road. Both ideas are problematic, and therefore opposed by MCDOT.

   a. The extended/expanded "Old" Old Georgetown Road would eliminate a major storm water management (SWM) facility being built as part of the MD 355/Montrose Parkway interchange. Given the importance of SWM, which this plan itself recognizes in its sustainability section, the draft needs to propose a replacement site for the SWM. Experience has shown that where a plan calls for a facility at a location that is environmentally sensitive, implementation of the plan may be frustrated. Therefore, the plan must deal pro-actively with SWM "problems" created by calling for additional infrastructure.

   b. The reduction of Old Georgetown Road from Executive Boulevard to MD 355 does not make sense, because roadway capacity will be at a premium under this plan, so why eliminate capacity which already exists?

9. Randolph Road
   Randolph Road is designated as Arterial road "A-90" in the North Bethesda Master Plan, and therefore needs to be similarly referenced in this Sector Plan. At a minimum Figure 43 needs to show Randolph Road so designated, and Table 4 needs to add a listing for Randolph Road. This will also make the road table (Table 4) internally consistent with the bikeway table (Table 5) which does contain a listing for Randolph Road.

10. Woodglen Drive north of Nicholson Lane

    On page 57, Woodglen Drive north of Nicholson Lane appears to be redesignated as a private street. MCDOT has worked with MNCPPC and an adjacent developer to establish a compromise typical section, for the portion between Nicholson and Marinelli.

General Comments on the Street Network:

1. Improved Street Grid: The Plan envisions an enhanced street grid network to diffuse congestion and to increase pedestrian circulation. The grid includes new business streets and increased local connections, including private streets and alleys. MCDOT supports improvements to the street grid. There are a variety of issues associated with the street grid. These issues are outlined below:

   a. Who will pay to construct and maintain these streets?

   b. Regarding the proposal to decrease the width of the streets, one should be conscious of the width of the buses and the ability to provide transit services on local roadways. These same streets must also support emergency vehicles such as fire trucks and ambulances, and commercial trucks to serve businesses.

c. Several of the new and/or realigned roadways traverse private properties and existing commercial building. Rights-of-way for the new roadway segments are likely to be difficult to acquire, i.e., dependent on total redevelopment of the commercial properties and may occur in piecemeal fashion as to preclude functional roadways.

d. The proposed street system has many more intersections along Major Roads: MD 355. The short blocks would degrade both travel speeds and capacity to handle traffic volumes.

e. The approved Executive Regulations notes the purpose of the Context Sensitive Road Design Standards is to:

   i. "provide for the safety and convenience of all users of the roadway system (including pedestrians and handicapped persons, bicyclists, transit users, emergency service operators, automobile drivers, and commercial vehicle drivers);
   ii. facilitate multi-modal use;
   iii. provide for treatment of storm water using Vegetated Integrated Management Practices in the road right-of-way; and
   iv. accommodate, to the greatest extent possible, street trees as a . . . character element of the right-of-way and associated easements"

f. As a result, comments such as those on p.20 (". . . *loading and service functions should not hinder pedestrian movements. All streets must have ample space for pedestrians, bicyclists and street trees . . .*") and p.21 (*Pedestrian Priority Streets . . . cross sections must emphasize pedestrian activity, but vehicles will have access at greatly reduced speeds*) are either incomplete and/or inaccurate. They should either be deleted or revised to be consistent with the language in the approved ER.

g. The Mobility/Street Network Section should include discussions about proposed modifications to the street network in the 1992 Approved North Bethesda/Garrett Park Master Plan. The document should include a discussion about the proposal to remove the existing section of Executive Boulevard between Old Georgetown and Marinelli Roads (note this proposal would require action by the County Council).

h. The roadway network on Figure 33 ("Existing and Proposed Street Classification") is dependent upon Council approval of the proposal to designate the entire Sector Plan area as a Metro Station Policy Area. If that proposal fails, it appears several intersections along arterial and major classification roads will not meet the 600 foot spacing requirement in the County Code [Chapter 50, Section 26 (c.2)] – likely necessitating turn restrictions.

i. A number of approaches to master planned intersections do not align; this should be corrected. What will be the impact of the unnamed proposed street (west side of MD 355 between Marinelli Rd & B-16) on the Conference Center?

j. On page 23, Figure 13 (and those provided for individual Districts on subsequent pages), the proposed street layout does not agree with that shown on Figure 43 on p. 53.

k. Figures 39 and 43 need to reflect consistency in the roadway layout.

l. On page 51, second bullet from the bottom, the comment about adding storm water management along Rockville Pike per the Road Code should be reworded to reflect a recommendation that Rockville Pike, even thought it is a State Road should conform to the Road Code (and the Context Sensitive Road Design Standard Executive Regulation).

2. Walking Speed and the Street Network
   a. MCDOT notes that the Pedestrian Safety Initiative/Policy calls for 3.5 feet/second walking speed. This comment has been raised to MNCPPC Transportation staff in past discussions.

   b. The pedestrian recommendations in the Plan appear to be based on 2.5 feet per second walking speed. These recommendations probably cannot be provided if crosswalk distances are long (i.e. 60 feet) and complex signal phasing is required.

3. Conflicts between the Road Code and the Draft: MCDOT recommends consistency between the Road code and the draft regarding ROW widths.

   a. There is a significant disconnect between several of the right-of-way (R/W) widths proposed in the draft, and the standard widths set forth in the Road Code. MCDOT's understanding is that they should be consistent rather than inconsistent. It was agreed that Master Plans should not propose new street standards. New standards should be adopted before they are included in master plans, so that the standards undergo a thorough analysis.

   b. For example, the draft calls for the "Mid-Pike Spine Street" to be a four lane Business Road with a 90' R/W. The Road Code specifies a 100' minimum R/W for four lane Business District Streets. Table 5 in the Draft must be thoroughly revised and made consistent with the Road Code.

   c. All references throughout the document should include (or be replaced with) references to the Montgomery County Context Sensitive Road Design Standards, as was done in the recent Gaithersburg West Master Plan. This will ensure the proposed ROW widths, number of lanes and bicycle facilities recommended are compatible with the Road Code.

4. Target Speeds: The draft contains language pertaining to Target Speeds for roads in the planning area. All such language must be deleted. MCDOT continues to maintain that Target Speeds are a roadway design issue governed by the Road Code; they are not a planning issue subject to master/sector plans. Furthermore, the specific Target Speeds recommended in the draft are inappropriately low for the large geographical area (430 acres) covered by this plan. DOT notes that, at a minimum, footnotes stating that target speeds are

expected to be achieved upon the full development of the area, not during the interim stages, be included in the plan.

a. Page 52 indicates that automobile traffic contributes to greenhouse gas emission and that encouraging transit is beneficial. While this statement is correct, there is new research being used by TPB/COG that related carbon dioxide vehicle emissions to speed. Very slow speeds, less than 10 miles per hour have the worst carbon emissions while speeds in the 20 to 35 mph have the best emissions profile. The report should recognize that any benefit from transit may be offset by increased auto emissions from slower operating speeds. Additionally, traffic standing still due to congestion degrades air quality, economic development and quality of life for individuals and businesses.

b. PP. 56 & 59 – recommended target speed on all master planned roadways in the Sector Plan area = 25 mph (with the exception of Montrose Parkway). This recommendation is not consistent with the ranges of target speeds approved by the County Council for different classes of roadways in an urban district. We oppose identifying a specific target speed in a Master Plan document; such an approach is contrary to Context Sensitive Design principles.

Pedestrian Facilities and Bikeways

1. Recreational Loop: Page 22 refers to a recreational loop. This loop crosses Rt. 355 three times. MCDOT recommends that the Plan recognize and address the potential for auto/ped/bike conflicts at these intersections.

2 Pedestrian Bridge over CSX Tracks: The CIP Projects section of the Implementation chapter contains some projects that are not discussed in the text of the plan. One example is a "Pedestrian Bridge over CSX Tracks". This needs to be deleted from Table 7 since no analysis is contained in the body of the plan justifying the need for such a bridge or the benefit for it given its probable significant cost.

3. Bikeway Network on the New Street Grid System
The lower volume, newly proposed grid street system would make a better bikeway network than the existing major roadways. MCDOT recommends the following routes:
    a. Boylston St., Citadel Ave., Huff Ct.
    b. B-7 Route, entire length.
    c. B-15 to B-16
    d. Local Street between Old Old Georgetown and MD 355.
    e. B-10, entire length.
    f. B-12, entire length.
    g. Old Old Georgetown Road (M-4a).

4. Marinelli Road
MCDOT cautions that Marinelli Road may not be an appropriate major bike route. MCDOT recommends providing an alternate route such as B-10.

5. Nicholson Lane Bike Lanes
   MCDOT notes that it will be difficult to gain bike lanes on Nicholson Lane between Woodglen and Nebel Street given the traffic volume and number of turn lanes. MCDOT recommends providing an alternate route such as B-7 – Executive Blvd.

6. Nicholson Lane as a Recreation Loop
   MCDOT notes that Nicholson Lane will not be a good recreation Loop roadway. It is undesirable currently to walk or to bike on Nicholson Lane. MCDOT recommends proposal of an alternate.

7. Shared Use Paths
   Comments from the Montgomery County Bicycle Action Group indicate that bicyclists desire bicycle friendly streets overall and not just shared use paths. Particularly in urban areas such as the White Flint area, it will be difficult for cyclists to share a path with the large amount of pedestrians in the area.

8. Bike Racks
   Bicycle racks should be proposed throughout the White Flint Area.

9. On-Street Parking
   P. 19 – On street metered parking has a detrimental effect upon the safety of bicyclists, especially on narrow private roads.

10. Curb Lanes Serve Bicycles
    Page 56 includes a bullet specifying that Rockville Pike be reconstructed. MCDOT staff recommends that the curb lane should serve bicycles as well as transit vehicles.

11. Bikeway Map Page 57
    a. How do bikes on DB-14 access SP-50 and SP-41? Map does not show connectivity.
    b. DB-13 should connect to White Flint Drive and/or Orleans Terrace for neighborhood access.
    c. DB-13 should have an arrow continuing onto Edson Lane heading west.
    d. SP-41 should indicate an existing bike corridor instead of an arrow to empty space.

Specific Comments: Other Transportation Issues

1. White Flint Urban Design Guidelines

   a. There is no need for "White Flint Urban Design Guidelines" as they relate to roads when the Road Code, which encompasses design for transportation projects, has just been completed. MCDOT remains concerned that the White Flint Urban Design Guidelines, which will not be specifically approved by Council, will conflict with the Road Code and cause confusion.

   b. Which agency will be responsible for administering the White Flint Urban Design Guidelines?

2. Streetscaping

The Plan recommends providing a streetscape on all existing public roads but does not mention who/how will the streetscape amenities will be maintained. The plan should specify how the streetscape will be maintained.

3. Utility Undergrounding

The comment on page 20 that (". . . locating . . . "dry" [gas, telephone, electric, & cable TV] utilities under the sidewalk will allow the street tree canopy the space to grow") is misleading. To properly address this issue, the public utility companies need to be brought into the discussion – to determine the short- and long-term implications of this proposal. MCDOT recommends allowing dry utilities to be located in the ROW only when approved on a case-by-case basis.

In the Bethesda and Silver Spring CBDs, developers are required to install rather costly amended soil panels to facilitate longitudinal root growth between adjacent street trees. The real reason for locating dry utilities in the right-of-way is to allow developers to maximize the area of the building envelope available for development instead of locating their utilities outside the right-of-way in Public Utility Easements. With the likely introduction of café seating in the right-of-way and increased pedestrian activity (due to the increased FARs and greater emphasis on non-auto mobility), sidewalk space will be at a premium for all users. When a utility company needs to close a sidewalk to access/repair their underground facilities under a sidewalk, the users of that sidewalk will be greatly impacted. [This issue is a topic for future discussion on the "Parking Lot List" of outstanding/unresolved items from the Context Sensitive Roads effort.]

Parking in the Sector Plan Area

MCDOT's reading of the Plan shows the need for 9,000 new parking spaces, at a cost of approximately $360 million, excluding land.

1. All parking in White Flint must be provided by Developers as required by Code.

2. Adequate parking accessible to the public must be provided for both long term and short term parking needs. This is to be determined by the parking study that is underway.

3. Publicly accessible parking must be managed by the County through the Department of Transportation.

4. The cost of managing the public parking must be covered by revenues generated by the parking. Free parking should not be permitted as suggested in the proposed CR Zone.

5. Although the Plan indicates that some streets will utilize on-street parking there is a great deal less specificity regarding parking than there is in may other aspects of the Plan. On-street parking is an operational issue that is evaluated based on traffic volumes and safety considerations which can change as traffic conditions change.

Department of Public Libraries

The Library Department supports the Recommendations in the White Flint Sector Plan July 2009 Draft, with these additions/changes:

- The Community Facilities and Cultural Resources map on page 60 of the Plan shows two alternate locations for the Express Library. The Libraries section on page 65 recommends the two locations for consideration. HOWEVER, the individual sector plan area descriptions ONLY have the Express Library included in the Mid-Pike District (page 34-35) and NOT in the Metro East District (page 32-33) description. **The Metro East location is the Department's PREFERRED location, not Mid-Pike**, so we would request that the introductory paragraph on page 32 be amended to include the following statement: "Public use space, in the form of an express library, should be considered for this area to capitalize on public transportation and Metro users as well as those living in housing nearby." A bullet statement, relating how the library would impact rezoning, would also need to be added.

- The Library Department believes strongly that a location on the METRO side of Rockville Pike is critical for the service and program plans we have for the Express Library. The Department is willing to wait for a leased property to become available near Metro in the Metro East District to make the vision and plans for this library a reality. The Mid-Pike District location for the express library would be an acceptable alternative location for the Express Library if the Department was planning a full service location. However, that is not the Department's plan. The Express Library is aimed at those who will be making quick stops (returning items in the book drop, picking up holds, checking out a book or a DVD to read/listen to on Metro or the bus) and not those who will be doing research or attending a program. Residents and mass transit users wanting access to a larger collection, programs, etc. will have the Rockville Library (on a Metro stop) or the Kensington Library, within 3-4 miles, to use.

- We support co-location with other County offices, including regional services centers, community centers, Gilchrist Center, and recreation centers. We would be open to discussing co-location with other types of County services, but prefer the Metro East District location.

- The Public Use Space Requirements section does not include any mention of the Express Library. The express library should be added to the bullets on page 68 as one of the "following projects recommended for White Flint."

- The staging of the library in Phase 1 of the Sector Plan development (page 75) will be dependent on the availability of CIP funds, the right size property to lease and an appropriate location near Metro in the Metro East District of the sector. This should be noted on the chart in the "Location/Limits" section on that page.

Department of Economic Development

Metro West District (pp 30 – 31)

- Subject to finalization of the proposed zone, DED accepts the proposed CR zoning for the Metro West District, which will enable and encourage denser, transit-oriented, mixed-use development.

- Correction to first paragraph on page 30: The Bethesda North Conference Center was publicly funded; however, there was no public investment in the attached Bethesda North Marriott Hotel. The hotel is privately owned; the County leases the land it is on to the hotel ownership group under a 99 year ground lease.

- Alignment of proposed new street (Market) through Conference Center site needs to be carefully thought through by the County, the Bethesda North Marriott ownership and other property owners in the Conference Center block. DED is concerned about ensuring that the proposed alignment facilitates further development on the County owned portion of the block.

- Figure 16 (page 31) does not show the proposed intersection realignment of Old Executive Boulevard and Old Georgetown Road, nor does it discuss how it will impact private property owners (e.g., will the realignment necessitate taking privately owned land?). The Plan needs to reaffirm the concept that if land is taken for the realignment of Executive Boulevard, that the "donating" property owner has title to the land that is subsequently made available through the realignment.

- The Plan states that "Wall Local Park" should be redesigned with more active outdoor facilities through developer contributions," but does not detail how this would happen. Is the draft document suggesting that the County create an amenity fund for this purpose?

Parking Management (page 55)

- In order for the White Flint Sector Plan development envelope to be achieved, it is critical that some type of a parking lot district be established in order for under-utilized properties (with surface parking lots) to be redeveloped.

Mobility Section

- DED agrees that, as proposed on page 55, it is important to bring together private property owners and public stakeholders to agree upon an alignment for the proposed Market Street and a plan for how to jointly fund it.

- DED supports the proposal to make the White Flint Metro Station Policy Area boundaries coterminous with the White Flint Sector Plan boundaries.

Staging Plan

- Page 70 – As noted, reconstruction of Rockville Pike will be disruptive for adjacent businesses and will necessarily impact customer access and visibility during construction. Frequent and timely communication among the County agencies involved in redevelopment (in particular DOT and, whatever existing or new entity is tasked with coordinating the overall redevelopment process), local businesses and surrounding residential communities will be important. Lessons learned from the Silver Spring redevelopment project (both what worked and what did not to lessen the impact on businesses) can be helpful in developing a communications and coordination plan.

Phasing

- The first sentence in this section (page 71) states '....all projects will be required to fund or, at a minimum, defray total transportation infrastructure costs.' It is not clear what this will mean in practice for private property owners as they pursue redevelopment. Additional information/clarification is needed.

- Phase 1 proposes a total of 3,000 dwelling units and 2 million square feet of non-residential development. The second paragraph of this section (page 71) indicates that "During Phase I, the Planning Board may approve both residential and non-residential development *until either of the limits above is reached.*" This implies that in Phase I ***either*** 3,000 dwelling units ***or*** 2 million square feet of non-residential development will be permitted, but not both. Is this the intent, or does the wording need to be changed?

- Clarify what is meant by 'Reconstruct Rockville Pike'

Financing

- DED supports the creation of a Development District or a Special Assessment District to help fund needed infrastructure improvements but believes this does not belong in the master plan and should be addressed outside of the plan by the Department of Finance.

Department of Housing and Community Affairs

The Department of Housing and Community Affairs (DHCA) has reviewed the Planning Board Draft White Flint Sector Plan. We offer the following comments on the plan for inclusion in the Executive Branch comments to the Montgomery County Planning Board.

- Page 27: DHCA supports the Sector Plan language on p. 27 that states "all new residential development should include different unit types and sizes, including options for the number of bedrooms per unit, and provide choices for all budgets. … Affordable Housing is a suitable use for publicly owned land or land recommended for public use. Where new development is proposed adjacent to publicly owned land, consideration should be given to public/private ventures to provide more than the required affordable housing through land swaps or other creative solutions." (emphasis added) This language complies with the recommendations of the County Executive's Affordable Housing Task Force.

- Page 27: DHCA recommends that the aforementioned language be strengthened by adding: "All County capital projects should be evaluated for the potential to provide a higher proportion of affordable housing than that normally required by County ordinance."

- Page 60: The County Executive's Affordable Housing Task Force recommends that all County capital projects be evaluated for potential co-location of affordable housing. In order to facilitate the implementation of this effort, DHCA requests that the co-location of affordable housing with a public facility be considered at the earliest stages of site selection and facility planning. We recommend that the following statement be added to the Sector Plan's Community Facilities & Cultural Resources section: "Co-location of affordable housing should be considered during site selection and facility planning for public facilities."

Department of Recreation

Wall Local Park

Wall Local Park is approximately 11 acres and within one half-mile of the Metro station. The Montgomery Aquatic Center and a large surface parking lot (250 spaces) occupy almost half the site. If the surface parking were relocated, Wall Local Park could include more outdoor recreational options for the surrounding community and the future residents.

This Plan envisions a public/private partnership with adjacent properties to relocate the surface parking within a parking structure built in conjunction with new residential development such as a public/private agreement. This would help redirect public sector funds from building structured parking on-site to improving Wall Local Park.

Any relocation of **parking facilities** must retain –

1. Very close proximity to the entrance of the Aquatic Center
2. Accommodation for accessible parking spaces of sufficient size and number to meet current & future demand
3. Immediate access for rescue & emergency vehicles
4. Surface drop-off & pick-up for users
5. Access for transit buses
6. Convenient pedestrian access from the Metro

The redesign of Wall Local Park should incorporate the sizable trees and include a pedestrian connection to the Josiah Henson/Uncle Tom's Cabin site, a cultural site of international significance, about one quarter-mile south on Old Georgetown Road and one half-mile from the Metro station.

The facility plan for Wall Local Park should consider:

That the MAC is a significant regional amenity that currently hosts a number of programs annually that outstrip available parking & access. Planning must accommodate continued future growth of these programs as population/usership increases.

- an outdoor splash park
- an expanded indoor pool area
- skateboarding facilities
- playgrounds for young children
- level grass areas, possibly synthetic, for leisure and informal play to serve people of all ages
- flexible space for adults, children, teens, and young adults including family/small group gathering & picnic spaces
- paths
- a pedestrian connection to adjacent pathway systems including Josiah Henson/Uncle Tom's Cabin/Metro site.

Bethesda- Chevy Chase Regional Services Center

Urban district services need to be addressed with a funding mechanism identified to provide for such increased services. Urban District financing must be sufficient to fully fund the cost of urban district maintenance services and promotion activities.

A satellite RSC in North Bethesda is desirable. The satellite RSC should include public meeting space and be co-located with one or more public functions, such as the Library.

The Montgomery Aquatic Center should be augmented with a neighborhood recreational center, instead of outdoor splash park and other features that would see seasonal use.