



February 11, 2022

VIA ELECTRONIC MAIL

councilmember.albornoz@montgomerycountymd.gov

The Honorable Gabe Albornoz
President, Montgomery County Council
Steel B. Werner Council Office Building
100 Maryland Ave.
Rockville, MD 20850

Re: Testimony for the Silver Spring Downtown and Adjacent Communities Plan

Dear President Albornoz and Members of the Council:

Enclosed is a copy of my written testimony for the public hearing on the Silver Spring Downtown and Adjacent Communities Plan. My testimony is generally in support of the draft Downtown Plan but with some comments and suggested consideration.

Please place this written testimony in the Record of the public hearing that is scheduled to be held on February 17, 2022. If you have any questions on this material, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Sean M. Stadler', with a long horizontal flourish extending to the right.

Sean M. Stadler, FAIA
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**TESTIMONY FOR SILVER SPRING DOWNTOWN AND
ADJACENT COMMUNITIES PLAN**
(Sean Stadler, February 11, 2022)

Good evening, my name is Sean Stadler, and I am a Managing Principal with WDG Architecture. Our firm has been working with the Metro Plaza development team for years to develop viable options for the redevelopment for their site but due to the Purple Line construction we have been unable to move any plans forward until the completion of construction.

I have reviewed the draft Downtown Plan and would like to offer some feedback as it is currently written with specific emphasis on the Metro Plaza Site that has been identified as part of the "Metro Center District" and an "Opportunity Site." The Site is located at the Northeast corner of Colesville Road and East-West Highway immediately adjacent to the northern Metro Station entrance.

As one of the Plans "Prominent Destinations" and gateway sites into Downtown Silver Spring it holds a significant opportunity to immediately impact the perception of the urban vitality of Downtown Silver Spring. We support the recommendations for "The Metro Center Plan District," being reimagined as a hub of activity with the highest-intensity commercial development in the Downtown.

The plan correctly identifies this Site as being significantly constrained by multiple physical and easement related restrictions including, the new Purple Line rail tracks and substation that is located within the site. Currently, the Site is underutilized because of these constraints which have created a narrow site, landlocked physically, with numerous easements that leave an awkward configuration for future development for such a prominent site.

- The Draft's Downtown Plan Framework is correctly allowing for flexibility in height and density that could lead to a mixed-use project of combined building types and allows the site to be developed for best and greatest use while creating a memorable gateway into Downtown Silver Spring.
- Because of the Metro tracks elevation, a significant part of the site is challenging to program for a height of up to roughly 70 or 80 feet which impacts the first seven or eight levels of any potential re-development plan. Finding an appropriate use for the levels above an assumed pedestrian-oriented ground floor become challenging, and potentially use valuable FAR without the appropriate level of use. For the most part, these floors are well suited for an above grade parking structure, although because of the width of the site it is extremely inefficient and costly parking to construct.



- The site constraints illustrate perfectly why the proposed increased density and height are significant and provide an opportunity for the redevelopment of this site. We are in support of the plans recommending greater than 8.0 FAR in this location with a height up to 300 feet. Should we be able to achieve this level of density and height it would offer the ability to provide a world class mixed-use project that could potentially deliver significant new residential units of which a portion would be dedicated to affordable housing near public transit. The height and density would allow for greater design flexibility to create interesting massing that allows for tower separation, light, air, and simple massing gestures that can create great architecture.
- The Draft Downtown Plan notes a recommendation to relocate the Substation that occupies a prominent corner of the Metro Plaza Site. We are in support of this recommendation, and it would allow for a more developable site and promote a signature piece of architecture. Relocating the substation is not something the Landowner can negotiate on its own and will require others to help in this endeavor. So, we encourage the Plan and the County to help engage in the negotiations to relocate this substation.
- The Draft Plan's Map 17 still designates the eastern side of the Metro Plaza site and the existing Substation to be Parking/Transportation use and we recommend it should be categorized as mixed use to allow for development after a possible relocation of the substation.
- As part of the Draft Plan's proposed revision to the Public Benefits in CR Zones, two significant public benefits "Transit Proximity" and "Structured Parking" are proposed to be excluded from the list of public benefits. We would request that this be reconsidered with respect to this site and other prominent sites that are impacted by proximity to transit. Thriving Transit Oriented Development should always promote proximity to a transit station.

Plan Wide Recommendations

- In the Plan Wide Recommendations, it is noted that Contributions to "off-site public open space" will be required as part of the Optional Method of development for the Metro Plaza site. Since the site already has a significant cost burden of development because of its constraints, we would request that there is some provision to provide flexibility for the level of contribution that may be required.

Urban Design Guidelines

- The Draft Plan creates Urban Design Guidelines and a Design Review process similar in structure and function to the Bethesda Downtown Advisory Panel (DAP). We would encourage this process to allow Design Review to align with the development process so that development can proceed without creating additional development risk too early in the course of design.



Page 4
Montgomery County Council Public Hearing on
Silver Spring Downtown and Adjacent Communities Plan

- We would encourage a set process that outlines key decisions and incremental approvals which allow the projects to continue to move forward so that the development team can more accurately understand the cost and risk by specifically focusing on height/density/massing/form and design guidelines before detailed design submissions are required.

We would also recommend that there is specific flexibility in the Design Guidelines to allow for different site constraints and conditions that would not create too rigid of guidelines that affectively promote prescriptive design solutions.

Thank you for your consideration of my comments.