March 24, 2016

The Honorable Nancy Floreen
President, Montgomery County Council
Stella B. Werner Council Office Building
100 Maryland Avenue
Rockville, Maryland 20850

Mr. Casey Anderson
Chair, Montgomery County Planning Board
Vice Chair, Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Dear Ms. Floreen and Mr. Anderson:

The purpose of this letter is to provide information on the school impacts of master plans that currently are being developed by the Montgomery County Planning Department, the Bethesda Downtown Plan, the Lyttonsville Sector Plan, and the Westbard Sector Plan that now is being reviewed by the County Council. Montgomery County Public Schools (MCPS) is experiencing extremely challenging enrollment increases. These three plans, located in the lower portion of the county, are coming at a time when many of the schools in the area either currently exceed capacity or are projected to exceed capacity in the near future.

**Westbard Sector Plan**

The County Council's Planning, Housing, and Economic Development (PHED) Committee recommendation for the Westbard Sector Plan significantly reduces the number of planned housing units. The new recommendation would result in the following number of non-age restricted housing units: 135 townhouse units, 487 multifamily mid-rise units, and 516 multifamily high-rise units. The estimated number of students generated by these new housing units is 99 elementary school students, 43 middle school students, and 53 high school students.

County Council staff has determined that revenue collected from the school Impact Tax for the planned housing units would total approximately $10.3 million. Due to the relatively small number of students generated by the PHED Committee’s recommended plan, it will be possible to expand existing schools to accommodate these students. After examining our options for expanding schools, it appears that the $10.3 million from the school Impact Tax will be adequate to meet our capital costs to accommodate the additional students based on the current construction market values.
Bethesda Downtown Plan and Lyttonsville Sector Plan

The Bethesda Downtown Plan and the Lyttonsville Sector Plan currently are in development at the Montgomery County Planning Department. The Planning Board has taken no action on these plans. Planning staff has provided MCPS staff with the following estimates of new housing units that will result from the plans. The table illustrates the number of housing units and the estimated number of students generated from the two plans.

<table>
<thead>
<tr>
<th>Bethesda Downtown Plan</th>
<th>Lyttonsville Sector Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>8,450 multifamily high-rise units</td>
<td>4,441 multifamily high-rise units</td>
</tr>
<tr>
<td>Grades K–5 = 405 students</td>
<td>Grades K–5 = 145 students</td>
</tr>
<tr>
<td>Grades 6–8 = 170 students</td>
<td>Grades 6–8 = 60 students</td>
</tr>
<tr>
<td>Grades 9–12 = 220 students</td>
<td>Grades 9–12 = 80 students</td>
</tr>
</tbody>
</table>

In total, the Bethesda Downtown Plan and the Lyttonsville Sector Plan will generate approximately 550 elementary school students, 230 middle school students, and 300 high school students. Most of these students will reside in the Bethesda-Chevy Chase Cluster, and a small number of these students will reside in the Albert Einstein Cluster, which is part of the Downcounty Consortium.

Accommodating the 550 elementary school students will require opening a new elementary school. Compared to expanding schools by adding classrooms, constructing a new school carries more costs. In addition, if site acquisition is required, then costs will further increase. Accommodating the 230 middle school students may be possible through expansion of the new Bethesda-Chevy Chase Middle School #2, which has a master-planned addition included in the current design.

Accommodating the 300 high school students will be much more challenging. Bethesda-Chevy Chase High School has a planned addition opening in August 2018. The addition will increase the school’s capacity to 2,407 students. Even with the planned addition, the school is expected to slightly exceed capacity by the 2021–2022 school year. Therefore, an assessment of where and how to provide for the high school students will be made as new housing is built. Enrollment increases already are straining the high schools surrounding the Bethesda-Chevy Chase Cluster—Albert Einstein, Walter Johnson, and Walt Whitman high schools. These high schools face the following challenges:

- Walt Whitman High School has a planned addition opening in August 2020 that will increase the school’s capacity for 2,398 students. Additional capacity will be needed to accommodate the new housing in the Westbard Sector Plan.

- Master-planned development in the Walter Johnson Cluster requires the consideration of two options: add on to the current Walter Johnson High School and increase the capacity
to approximately 3,600 students or reopen the former Charles W. Woodward High School
to serve high school students in some capacity.

- Montgomery Blair, Albert Einstein, John F. Kennedy, and Northwood high schools
  are projected to substantially exceed their capacities within the next six years. Combined,
  these four high schools will be 1,617 seats more than their capacities by the 2021–2022
  school year. The feasibility of additions to these schools currently is being studied.
  Opening a new high school in this area also may need to be considered.

The additional high school students from the two plans will compound high school space needs
and costs.

**Calculating Capital Costs**

A number of factors need to be considered when determining the real capital cost impact of master
plans and new housing developments. A number of costs are in excess of what is currently
calculated in school Impact Taxes and School Facilities Payment. The Impact Tax and School
Facilities Payments are based on the per-student cost of construction of new schools. This
per-student dollar amount is multiplied by the number of students generated by various housing
types. The following factors not accounted for in this calculation are:

- These master plans will take many years to build out; however, the charges do not account
  for the increases in construction costs that will occur by the time a project is built to serve
  master-planned development. (Current construction costs are used in the calculation
  of the school Impact Tax and School Facilities Payment.)

- In cases where additions are feasible to accommodate master-planned development,
  the charges that are based on new school construction do not account for the higher cost
  for smaller projects where economies of scale are not present.

- Charges do not include possible site acquisition costs. This is a problem as master plans
  focus on infill and urban development where land costs are very high and potential
  properties are extremely difficult to find.

- Charges do not consider the cumulative impact of multiple master plans on the need
  for school capacity, as is the case today with the three plans reviewed in this letter.
  As each plan adds more housing in an area, the solutions to provide more capacity become
  more complex and costs can increase.

We believe that the master plans should be thoroughly reviewed now to ensure that adequate public
facilities, such as schools, can be provided in the future with fewer difficulties. Further, adequate
costs with the appropriate inflation rate should be factored in the school Impact Tax and School
The Honorable Nancy Floreen
Mr. Casey Anderson

Facilities Payment to lessen the financial pressure many years later. We request that these critical concerns are considered as you review the master plans and the Subdivision Staging Policy.

Thank you for your consideration and for your support of our schools. If you have any questions, please contact Dr. Andrew M. Zuckerman, chief operating officer, at 301-279-3627 or Mr. James Song, director, Department of Facilities Management, at 240-314-1064.

Sincerely,

Michael A. Durso
President

MAD:LAB:AMZ:limt

Copy to:
Members of the Montgomery County Council
Members of the Board of Education
Mr. Bowers
Dr. Navarro
Dr. Statham
Dr. Zuckerman
Mr. Crispell
Mr. Song
Mr. Ikheleo
Members of the Montgomery County Planning Board
February 26, 2016

Mr. Casey Anderson, Chair
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re: Greater Lyttonsville Sector Plan Public Hearing Draft

Dear Mr. Anderson:

Thank you for the opportunity to review and comment on the Public Hearing Draft of the Greater Lyttonsville Sector Plan.

The Plan is generally consistent with Executive Branch objectives including supporting appropriate development around future Purple Line stations, encouraging multimodal transportation, restoring environmental features, and highlighting the important history of Lyttonsville.

Technical comments from the Departments of Transportation, Environmental Protection, Recreation, Health and Human Services, Economic Development, and Fire and Rescue Services are attached for your review.

Thank you for the opportunity to comment. Please contact me directly if you have any questions.

Sincerely,

Greg Ossont
Deputy Director

cc: Gwen Wright, Planning Director
    Robert Kronenberg, M-NCPPC
    Erin Banks, M-NCPPC
    Reemberto Rodriguez, RSC
Executive Branch Departmental Comments on the Lyttonsville Sector Plan
Public Hearing Draft

Department of Transportation
February 4, 2016

Major comments:
1. The relationship and impacts of the plan recommendations for the Lyttonsville areas for TPAR transit adequacy (for existing, and build-out TPAR milestone analysis years) should be addressed in the plan. The plan should identify the current status of transit adequacy, as well as discussed specific recommendations to address this condition.
2. In general, proposed typical sections (for County roads) should be consistent with existing MCDOT design standards. If there are extenuating circumstances where an adopted MCDOT design standard needs to be modified to implement the desired cross-section elements, the standard number should be noted as modified and the proposed changes should be identified on the detail.
3. Page 42 – C., Stewart Avenue: There is reference to Site 8b and 9 in the section. Please refer to the plan showing Site 8b and 9. Please add a detail showing the proposed design.
4. Page 43, D., Brookville Road Industrial District: The proposal to convert Monard Drive, from a private road to a public street, requires more than widening and right-of-way dedication – the private applicant(s) will need to satisfy Department of Permitting Services’ requirements to accept the road transfer. The Department of General Services is currently studying the Brookeville Depot site for future needs, Planning staff should coordinate with DGS to ensure recommendations are consistent with future facility requirements,
5. Page 46 discounts TPAR considerations on the basis that this plan does not have a significant amount of development. However, the proposed reduction of MD 390 (16th Street) from 6 lanes to 4 lanes could be a substantive impact. If a TPAR analysis does indeed pass, this would bolster the case for the road diet. If the TPAR fails, this would establish that additional considerations may be necessary toward achieving the plan’s vision. At a minimum note whether the road diet was included as part of the TPAR analysis or the intersection CLV analysis.
   a. Also, relate the road diet proposal and the plan as a while to impacts outside the plan area to CIP projects at Seminary Road and the SHA long planning study on Georgia Avenue between 16th Street, and general mobility outside of the plan area.
   b. Removal of thru travel lanes on 16th Street would be subject to completion and approval of a formal air quality conformity analysis by the National Capital Region Transportation Planning Board.
6. Purple Line
   a. Any changes made to Purple Line design will be at County cost, to be negotiated with the concessionaire. Any recommended changes require careful consideration.
b. Lyttonsville Station - *Eliminate the proposed Kiss & Ride area at the Lyttonsville Purple Line Station.* As a neighborhood-serving transit station, space along Lyttonsville Place and Brookville Road should be prioritized for enhanced streetscapes and pedestrian and bicycle access to the station. MCDOT does not support elimination of the Kiss and Ride.

7. Page 97, Table 4.2 Capital Improvements Program
   a. Reference to potential developer/private sector contribution to the Capital Improvements Program listed projects should be added as a table attribute and clearly noted in the section text. A number of these projects would only be implemented as private sector or public private partnership projects.

**General Comments:**
1. It is important to include a safety component in all transportation projects involving County roadways and for each modal element referenced in the Transportation Sections.
2. Identify areas where additional ROW &/or pavement may be needed to meet proposed configurations.
3. The relationship and impacts of the plan recommendations for the Lyttonsville areas for TPAR transit adequacy (for existing, and build-out TPAR milestone analysis years) should be addressed in the plan. The plan should identify the current status of transit adequacy, as well as discussed specific recommendations to address this condition.
4. All references to improved pedestrian connections, access and/or safety should also include improved bicycling/cyclist connections, access and safety.
5. Additional discussion should be added regarding the relationship with whether new local and business streets will be public or private streets, and if so under what conditions.
6. All text references and maps should label Sixteenth Street as “MD-390”
7. Lyttonville Place should be labelled on maps.
8. Consider changing the following terminologies where appropriate throughout the document: from *pedestrians* to “people walking”; from *bikes* to “people biking”; from *bicycle path/trail* to “shared use path/trail”.
9. Consider changing references to *US Army* to “Department of Defense” as multiple Defense Department agencies are located on the Fort Detrick Annex.

**Page-specific Comments:**
1. Pages 6 & 7 – Summary of Recommendations
   a. For the proposed roadways the proposed utilities should be underground. However, for the existing roadways the conversion of overhead utilities to be underground should not be suggested in the report until there exists an agreement (between the regulatory agencies and the development community) on how to fund the conversion of overhead utilities to underground locations, comments such as “*Bury overhead wires underground to avoid conflicts with street trees.*” should be deleted.
b. On page 6 it is stated that all roads in the Sector Plan area are to be designed for shared use by motor vehicles and bicycles. With this in mind, on p54-55: what is the need for designing shared roadways? What new ROW or design obligations does this entail as compared to roads that do not have any designated bike routes on them?

2. Page 10 – Challenges – *Inadequate or missing sidewalks discourage walking and cycling* – Sidewalks should not be assumed as adequate cycling facilities.

3. Page 31 – Purple Line- (B) Recommendations:
   a. “Incorporate historically oriented interpretive signage, markers and commemorative art throughout the planning area, including in purple line stations.”- Who is responsible for the maintenance of the special signage, markers and commemorative art?
   b. “Include Richland Place, a neighborhood of mid-century modern homes, among resources to be evaluated.”- Should this be re-worded to say…. resources to be evaluated for redevelopment.

4. Page 33- Water Quality - (B) Recommendations: “Use permeable paving for portions of roads, road shoulders, sidewalks walkways and parking lanes where feasible.” – Are these recommended in the public right-of-ways? MCDOT does not allow permeable roadway paving in the public right-of-ways (although the suggestion to allow it within parking lanes has been proposed in the pending Bethesda Downtown Plan).

5. Page 34 – Section 2.4.2: What is meant by “Prioritize street tree planting . . .?” Should the statement read “Encourage street tree planting . . . when building new or retrofitting existing roadways?”

6. Page 37 – Section 2.5.2: “The existing Rock Creek Pool site should be considered as a community facilities site that may accommodate a new school if all other options are exhausted by MCPS.”- The existing Rock Creek Pool site is privately owned per page 38 of this report and since a proposed school site is being recommended in this report, it should be identified in the proposed Land Use Map (page 23) as a potential site for the proposed school.

7. Page 40 – Section 2.6 Transportation: “Complete streets refer to roadway treatments intended…..within the same right-of-way.”- The word “treatments” should be replaced by “improvements.” The last sentence in the 2nd paragraph could be followed by a caveat statement (that stormwater management in public rights-of-way are now required under the County’s Executive Regulation for Context Sensitive Road Design Standards).
8. Page 41, Section 2.6.1, Goals: Suggest amending the 2\textsuperscript{nd} bullet (“Increase the use of non-auto driver travel.”) to read “Increase opportunities for non-auto driver travel options.” Also, we suggest they provide more explanation/details for what is desired in the 3\textsuperscript{rd} and 4 bullets.

9. Pages 41-45, Section 2.6.2 Roadways:
   a. To help the reader better understand their transportation proposals, Table 2.6.1-Master Planned Major Highways and Arterials and Figures 2.6.2 (Urban Road Code) and 2.6.3 (Roadway Classifications) should be moved up to page 41 - before the roadway typical sections in the report.
   b. In general, proposed typical sections (for County roads) should be consistent with existing MCDOT design standards. If there are extenuating circumstances where an adopted MCDOT design standard needs to be modified to implement the desired cross-section elements, the standard number should be noted as modified and the proposed changes should be identified on the detail.
   c. Page 43 re: Stewart Avenue - Recommend maintaining access from the existing Stewart Ave and at-grade crossing to industrial properties to avoid introduction of commercial traffic onto Kansas, Pennsylvania and Maine Avenues.
   d. Page 43 Brookeville Road Industrial District and Figure 2.6.1 Proposed Industrial Loop. and proposed Road network enhancements connecting to Brookeville Road. While there is support for additional connections, DOT recommends shifting roadways south off of DOD/Army property (north of Garfield Road). DOT does not support shared access to the Ride On (and future MTA) Access Driveway but does not support a parallel connection immediately north of the access road through the proposed redevelopment site.
   e. Page 40 – Paragraph 2 – This approach does not include “green streets” enhancements, such as stormwater management as part of its primary objective. Consider deletion of this sentence as unnecessary. Also it should be noted that stormwater management or best practices for stormwater management are legal requirements and do not need to be added as recommendations.
   f. Page 41 – Section 2.6.2.A; Spring Street Extension (B-1):
      i. Why is the right-of-way proposed to be 60 feet when the recommended typical section and Table 2.6.1 propose it to be 80’ wide?
      ii. Consider modification to MCDOT design standard MC-2005.02 (Business District Street, 2 lanes with parking on both sides, 70-foot right-of-way) to reflect the proposed separated bike lanes?
      iii. A three (3) foot lawn panel immediately next to parallel parked vehicles is inadequate – need at least 2’ paved separation between the curb and the
lawn panel (to allow room for passengers to enter/exit vehicles) + more room for vegetated stormwater management facilities. We do not support showing street trees coincident with parked cars. Considering the current topography and potential steep grade of this road, we recommend the typical be amended to be:

- 6 foot sidewalk
- 7 foot separated bike lane
- 5 foot-4 inch lawn panel (including vegetated stormwater management facilities)
- 2 foot-8 inch paved area between lawn panel and face of curb
- 8 foot parking lane
- 11 foot travel lane – on each side, using MC-2005.02 modified (right-of-way increased to 80 feet)

iv. “This connection may be implemented as a private street and should accommodate two-way vehicular traffic.” - This proposed street extension is an important connection for the public on the east side of 16th Street. Based on the ongoing inter-agency workgroup addressing the issue of public/private roads we recommend that Spring Street extended shall be a publicly maintained road. If this proposed street is to be implemented as a private street; please list, the conditions for implementation as a private street with public access (Please refer to the public private road language in the adopted White Flint Sector Plan and subsequent Planning Board preliminary plan approvals for more details. We note that this issue is currently the subject of an inter-agency workgroup addressing the issue of private roads.).

v. Public/Private ownership and specific horizontal alignment.... for regulatory approval.” –Do we need this statement to be included in this report? The decision to require a public street (versus a private street with public access) and the related design criteria should be established at the preliminary plan stage – not at the permit/regulatory stage.

g. Page 42 – 16th Street Typical Sections:

i. A note should be added to this section to indicate that 16th Street is maintained by the MSHA (MD390). We defer to the MDSHA for comments the proposed implementation but offer the following comments on the cross-section

ii. Existing Section: Please show the total existing right-of-way.

iii. The 8 foot proposed width of the proposed two-way cycle track should be revised to be 10 feet.
iv. There is an existing overpass north of Spring Street; please provide a cross section for the Bridge portion of 16th street similar to the one shown for Lyttonsville Place cross section on page 51 of the report.

v. The total length of the existing roadway southbound from curb to curb is 37-feet measured from the median. The total length of the proposed roadway southbound from curb to curb is 38-feet measured from the median. There is an existing grade difference on the west side of 16th street and no sidewalk north of Spring Street. It will be a challenge to accommodate the 10-foot sidewalk as per the proposed section north of Spring Street (will have to extend additional 1-feet from the existing condition).

h. Page 42 – C., Stewart Avenue: There is reference to Site 8b and 9 in the section. Please refer to the plan showing Site 8b and 9. Please add a detail showing the proposed design.

i. Page 43, D., Brookville Road Industrial District: The proposal to convert Monard Drive, from a private road to a public street, requires more than widening and right-of-way dedication – the private applicant(s) will need to satisfy Department of Permitting Services’ requirements to accept the road transfer. What is the Department of General Services’ position on the proposed road extension through the property next to the County depot?

j. Page 43-Figure 2.6.1 Proposed Industrial Loop–: Please label all the existing streets. For example, “Brookville Road” is not labelled.

k. Page 43, E. Urban Road Code Boundary: We recommend this discussion be moved to the introduction of Section 2.6, along the aforementioned relocation of the related map.

l. Page 45 – Figure 2.6.3 Roadway Classifications: Please show the enhanced intersection/crossing improvements in this plan as shown in Figure 1.1.2 Concept Framework Plan (Page 9).

m. Please move the other roadway cross sections - Lyttonsville Place, and Lyttonsville Road/Grubb Road from page 50, 51, 52 and 53 into the section 2.6.2 of the report.

10. On page 45 the map includes (1) and (2) references to “See Stewart Avenue” & “See Purple Line”, respectively, but does not give any indication as to where these references are located or what the user is supposed to be looking for such that it could not be worked into this map.

11. Add nearest cross-sections to the Streets table on page 46. All but five non-SHA segments correspond directly to a CSRD standard. The different five are:

a. Three of the four segments of MA-3 are 2004.22 mod (separated bike lanes)
b. B-1 is 2005.02mod (cross-section is detailed on p41)
c. P-4 is 2003.10mod (20-foot reduction in ROW)

12. Clarify how P-4 will be designed, as the narrowest Primary Residential cross-section is 70 ft. Reducing the cross-section by 20 feet will likely require narrowing lanes &/or narrowing the landscaping width. Note that with the latter: this may affect the type of trees that are able to grow along the roadway.

13. Page 46 discounts TPAR considerations on the basis that this plan does not have a significant amount of development. However, the proposed reduction of MD 390 (16th Street) from 6 lanes to 4 lanes could be a substantive impact. If a TPAR analysis does indeed pass, this would bolster the case for the road diet. If the TPAR fails, this would establish that additional considerations may be necessary toward achieving the plan’s vision. At a minimum note whether the road diet was included as part of the TPAR analysis or the intersection CLV analysis.

   a. Also, relate the road diet proposal and the plan as a while to impacts outside the plan area to CIP projects at Seminary Road and the SHA long planning study on Georgia Avenue between 16th Street, and general mobility outside of the plan area.
   b. Removal of thru travel lanes on 16th Street would be subject to completion and approval of a formal air quality conformity analysis by the National Capital Region Transportation Planning Board.

14. On pages 46-47, the document discusses Roadway TPAR and then goes into Transit, but does not discuss Transit TPAR.

15. Page 46, Table 2.6.1 Master Planned Major Roadways and Arterials
   a. Add a column to indicate the recommended MCDOT Design Standard for County-maintained roadways.
   b. Add the standard note to indicate the minimum right-of-way widths are independent to the right-of-way needed for auxiliary turn lanes.
   c. M-9, 16 Street: isn’t the southern limit for this roadway at the District of Columbia line? (The map on page 45 shows M-9 extending south of the East-West Highway intersection.)
   d. Industrial Road I-1, Montgomery Street: the street name is misspelled in the 2nd column.
e. Primary Residential Roadway P-4, Linden Lane: where is the discussion/rationale for having a 50-foot-wide right-of-way on a primary residential street? Are there are proposed cross-section changes?

16. Page 47 - 2.6.3 Transit:
   a. A transit Map should be added to show the location of the Lyttonsville Maintenance Yard, Lyttonsville Station, Capital Crescent Trail and Woodside Station.
   b. It should be noted that local transit service adjustments are likely once Purple Line service is operating.
   c. Since the Silver Spring/Takoma Park policy area is inadequate for TPAR transit, what recommendations does the master plan have for this area?
   d. Purple Line
      i. Any changes made to Purple Line design will be at County cost, to be negotiated with the concessionaire.
      ii. Lyttonsville Maintenance Yard: The description mentions Lyttonsville Place Bridge; which is a CIP project (P501421). The report does not list the CIP projects.
      iii. The “Harry Sanders” station conflicts with MTA station-naming policy. They do not allow names of people (alive or dead) in station names. If this were done, consider whether this allows calling the station something like “16th Street” on maps, signs, etc.? Naming it Harry Sanders Station, would not offer any guidance to unfamiliar users? (Such as how Silver Spring Transit Center is more informative than Paul S. Sarbanes Transit Center). The official name that would be used as a matter of operations and navigation of the system should be a distinctive geographic name, such as Lyttonsville. – This also should be updated in Table 1.3 on page 6.
      iv. Lyttonsville Maintenance Yard - Limit the maintenance yard to the area south of the Lyttonsville Place bridge, with only the tail tracks and maintenance facility driveway located to the north of the bridge. – This should be confirmed w/ MTA to ensure that the space south of the bridge is adequate to suit the needs of the maintenance yard. Particularly if this change would prompt any changes in design, noting where we are in the design process of the PL.
      v. Lyttonsville Station - Eliminate the proposed Kiss & Ride area at the Lyttonsville Purple Line Station. As a neighborhood-serving transit station, space along Lyttonsville Place and Brookville Road should be prioritized for enhanced streetscapes and pedestrian and bicycle access to the station. MCDOT does not support elimination of the Kiss and Ride.
vi. Connect Brookville Road and the residential areas to the east of the Purple Line station via a mezzanine and an aerial walkway above the station platform, provided through developer contributions. - Consider how it will be implemented. Which land owners are expected to contribute? What if only side redevelops and any others are not? Consider and clarify the intended method of implementation to serve as guidance to both developers & agencies involved in Development Review.

vii. Evaluate the potential for Kiss & Ride facilities on both sides of 16th Street at the time the Purple Line station is constructed to serve peak-period traffic (i.e. southbound traffic in the morning/ northbound traffic in the evening). Isn’t there any onus on the master plan to “evaluate the potential”? What if additional ROW is needed beyond what the master plan calls for?

17. 2.6.4 Pedestrian and Bicycle Facilities:

a. Page 49 - (B) Capital Crescent Trail: The third paragraph includes the following sentences: “As currently designed in the MTA Purple Line project, the Capital Crescent Trail between Michigan Avenue and Lanier Drive does not meet minimum bike guidelines set by . . . AASHTO for a shared use path.” Why doesn’t the MTA design meet AASHTO criteria? “Montgomery County Department of Transportation should evaluate options for widening the trail at this location, including converting Michigan Avenue and Talbot Avenue to a one-way street between Pennsylvania Avenue and Lanier Drive.” – Why not just leave the sentence by just saying “MCDOT to evaluate options to widen the trail at this location.” Do we need the second part of the sentence?

b. (C) New Bikeway Proposals:
   i. Page 50 - 16th Street: Refer to the cross section on Page 42.
   ii. Lyttonsville Place Cross Sections–
       • The Table 2.6.1 shows Lyttonsville Place as 80-foot right-of-way. The proposed section non-bridge shows a 70-foot right-of-way and the bridge shows a 68-foot right-of-way.
       • Page 50 - Existing Section: Please show the total existing right-of-way.
       • Page 51- Proposed Sections: Northbound traffic has only one lane which will be the access to the proposed Lyttonsville station. Will there be queuing during the morning peak hour?
       • Page 51- Proposed Section Bridge: The existing section shows a 4-foot sidewalk on both sides. The proposed section shows wider sidewalks which means the existing bridge needs to be widened.
The CIP project Lyttonsville Place Bridge (P501421) proposes a 48-foot roadway, two 5-foot sidewalks and the two safety parapets. The Sector Plan should be revised to be consistent with the CIP design.

iii. Lyttonsville Road Cross Sections–
- Page 52 - Existing Section: Please show the total existing right-of-way.
- Page 52, 2nd bullet: According to the August 2000 Approved North & West Silver Spring Master Plan, the pavement width on Lyttonsville Road/Grubb Road (north of East-West Highway) is 48’ – so this plan proposes narrowing the roadway to implement the ultimate separated bike lanes. The table on page 97 (Capital Improvements Program) proposes implementing these separated bike lanes under a CIP project – which is more likely (than implementing same under private developer permits) considering the roadway cross-section will need to be narrowed to construct the proposed typical section.
- We recommend the ultimate cross-section be amended to provide:
  - 5 foot sidewalk (2 foot extra right-of-way or a Public Improvements Easement will be needed for the sidewalk maintenance/utilities strip)
  - 7 foot bike lane
  - 5 foot, 4 inch lawn panel with stormwater management
  - 2 foot, 8 inch paved area between lawn panel and stormwater management facility
  - 8 foot parking lane
  - 11 foot travel lane

iv. Page 53 – Spring Street Extended Street: Refer to the cross section on Page 41.
v. Page 53 – Why only Brookville Road is discussed in the report regarding the proposed shared roadways ways? Figure 2.6.5 – Bikeways- shows other proposed shared roadways.

c. On page 51, bear in mind that sidewalks along Lyttonsville Place may be a busy destination between bus stops, access to the Purple Line, and other features common to such highly trafficked areas: elevators & associated queues, informational signs, waste receptacles, newspaper bins, bus shelters, and perhaps even off-board fare machines (though no such service is presently planned). Some of these will place demand on the width of the sidewalk as well as the width of the buffer (particularly with regard to bus-related infrastructure).
d. On page 51, for the bridge cross-section, clarify why the buffer appears to visually be only about 2/3 of the dimensioned width. If this is intentional, consider re-dimensioning and better delineating this area.

e. On page 53, consider clarifying whether Spring Street Extended is proposed to have a pair of one-way separated bike lanes (as per p41).

f. On page 53, the text for Brookeville Road cites that separated bike lanes would be desirable, but that there is not adequate space to implement them. Per toward the latter: is the master plan not the best vehicle to begin pursuing the necessary ROW? If additional width is needed, intent could be established now rather than waiting another 1-2 decades, and any accompanying text could instead acknowledge the implementation is recognized as a long-term project dependent on acquisition of necessary ROW.

g. On pages 54-55, there are two LB-2’s: one a separated bike lane and the other shared roadway.

18. 2.6.5 Other Improvements:

a. On page 56, note that there may be need to revisit our standard truncations at intersections where protected intersections are anticipated. A general note should be added that the protected intersection concept is subject to further review by MCDOT and MDSHA prior to implementation.

b. On page 57, consider whether D.1. should also recommend pedestrian-scale lighting.

c. The second paragraph suggests protected intersections are recommended for all intersections with separated bike lanes and on-street parking. What happens if the on-street parking is prohibited at the intersection (as inferred in the drawing at the bottom of the page)? Perhaps the reference to on-street parking should be removed.

d. The intersection improvements as shown in Figure 1.1.2 (page 9) should be listed in a Table format.

e. The section addresses only intersection improvements related to bikeway. The intersection improvements should not be limited to the Bikeway circulation alone. (For example: The intersection of Lyttonsville Place and Lyttonsville Road. Based on the proposed cross sections; Lyttonsville Place has two southbound and one northbound lane and Lyttonsville Road has one lane each for east and west bound traffic. Due to these there could be potential intersection improvements in addition to the bikeway related improvements. May be there could be proposed traffic signal warranted at that location.)

f. D.1. Pedestrian connectors: A map should also be added to identify the locations of the proposed pedestrian connectors. There should be a discussion to identify the minimum right-of-way and require provision of DOT-approved lighting (if these facilities are to be publicly maintained.) If these connectors may be
privately maintained, there should be a requirement to grant Public Access Easements over same.

g. D. 3. Lyttonsville Station Entrance: A Traffic Signal at Brookeville Road / Stephen Sitter Avenue Gate is now planned with funding to be provided by USDOD

h. D. 3. Lyttonsville Station Entrance: The last sentence proposes widening the sidewalk on the west side of Stewart “Lane” between Brookville Road and the Capital Crescent Trail – should this sentence read Stewart “Avenue?” Is there sufficient right-of-way to accommodate this improvement? Are there any impediments to completing it?

19. Page 58, Section 2.6.6 Transportation Demand Management: Within six months of the beginning of Purple Line operation in Silver Spring, the Silver Spring Transportation Management District boundaries should be expanded to incorporate the additional non-residential (e.g., Summit Hills) and commercial density proposed in this Sector Plan. Outreach to employers prior to the beginning of Purple Line service will ensure that employees are aware of this new commuting option.

20. The TDM section could be enhanced by considering the following elements that could ultimately be considered as conditions of future development approvals:

   a. Appointment of a Transportation Benefits Coordinator to provide for distribution of information and promotional materials and facilitate planning of TDM-related outreach events within the project.

   b. Provision of Real-Time Transit Information display(s) and opportunity for other transit and alt-mode-related information in key locations within the project (e.g., information on car sharing, Bikeshare, bikeway facilities, bike parking facilities, etc.)

   c. Provision of preferentially-located car/van pool parking spaces and car-sharing parking spaces on-site

   d. Provision of secure, weather-proof bicycle parking facilities for residents of multi-unit buildings and employees in office and major retail projects. Consider requiring provision of bicycle storage areas in garages for resident and/or employee use (e.g., bike cage) as well as a small bicycle repair station.

21. The following design elements intended to facilitate use and promotion of non-auto modes of transportation should be incorporated into building design for major projects:

   a. Design building frontages/lobbies to provide two-way visibility for transit vehicles, shuttles and taxis

   b. Provide electric and water connections in outdoor gathering areas to enable outreach events to be staged more readily

   c. Provide kiosks in active outdoor commercial areas to provide opportunity for information and assistance

   d. Provide concierge/reception desk in lobbies with an area where TDM information and passes can be obtained – e.g., transit timetables, loading of SmarTrip cards
22. Section 2.8.1.A, Public Space Network (Goals): the third bullet is unnecessary – unless they want to add a sentence to comply with the Executive Regulation for Context Sensitive Road Design Standards.

23. Page 68, Section 3.1 Woodside/16th Street Station Area:
   a. Page 68-Site 2 Third paragraph: The language on this page (Spring Street extension is recommended as Private Road) is not consistent with the text on page 41 (this connection may be implemented as a private street).

24. Section 3.2.2, Public Space Improvements: The fourth bullet proposes widening the existing sidewalk within the Lanier Drive right-of-way between Quinton Road and Richland Place to meet ADA. Are there any impediments to completing it?

25. Section 3.3 Brookville Road/Lyttonsville Station Area:
   a. Why is the Rock Creek pool excluded from this section? On Page 37 – Section 2.5.2; talks about a recommended school to be accommodated within the Rock Creek Pool.
   b. Why the Lyttonsville Maintenance Yard site location excluded from the section? Based on the location of the Lyttonsville Maintenance Yard there will be proposed improvements along Brookville Road. There is no mention of the improvements along Brookville Road in this report other than the bikeway improvements mentioned in page 53.
   c. Section 3.3.2, Public Space Improvements: The first bullet proposes widening the existing sidewalks on Lyttonsville Place for enhanced walkability to the proposed Lyttonsville Purple Line station. Are there any impediments to completing it?
   d. Section 3.3.2, Public Space Improvements: The second bullet proposes installing improvements to discourage cut-through traffic and prevent trucks from accidentally entering the residential neighborhood. If physical channelization measures are installed, they would also be precluding legitimate truck deliveries to the residences – an unintended consequence. Recommend consulting DTEO for option(s); perhaps “No Thru Trucks over 7000 GVW” signage may be appropriate. (This comment also applies to the last bullet on page 89.)

26. Page 91, Garfield Road Terminus: please see previous comments on Brookville Industrial District recommendations

27. Page 97, Table 4.2 Capital Improvements Program
   a. Reference to potential developer/private sector contribution to the Capital Improvements Program listed projects should be added as a table attribute and
clearly noted in the section text. A number of these projects would only be implemented as private sector or public private partnership projects.

b. Roadway B-1 / Spring Street Extended (as a private sector responsibility) is missing from this table

Department of Economic Development  
February 1, 2016

The Lyttonsville business community remains concerned about the ability of this unique and successful industrial area to be preserved if residential uses are allowed. Specifically, they continue to express reservations about the following components of the Plan:

Page 2, Recommendation #2
Expand neighborhood-serving retail opportunities and *allow some residential development*; and

Page 25, Proposed Zoning – Section #10
Commercial Residential Town Floating Zone, indicated by the cross-hatch pattern.

1. A market study of the area by Bolan Smart and Associates reported that conversion to significantly higher densities (and development costs) is not likely to be market supported.

2. The Bolan Smart and Associates study also warns that one of the most serious threats to an active industrial district is residential encroachment.

3. The community has been dubbed an ecosystem of industrial activities. Machinery and trucks of neighboring businesses are repaired there; other businesses produce supplies that are needed by companies in the park.

The Lyttonsville business community is recommending that the County enhance this area through branding and promotional activities. We anticipate, and wanted to alert you to the fact that they will continue to voice their strong opposition to allowing residential uses in this industrial park.
Department of Recreation  
January 6, 2016

The Plan shows the existing Recreation facility, Coffield Community Recreation Center, as a centerpiece of the sector. This has even more impact when it is considered that the entire western section of the area is made up of Institutional & Commercial land use and contains virtually no residents. This area, west of a line formed by Brookville Rd and extending west along the proposed Purple Line eliminates at least 1/3 of the sector when considering resident services delivery. This fact further emphasizes the importance of the Rosemary Hills-Lyttonsville Local Park and the Coffield Center to this community to meet recreation and leisure needs.

It would seem to make the most sense to focus improvements on this parcel as meeting the needs of the sector as a "Central Green" for use as an active recreation and accessible civic gathering space.

This parcel has been mentioned on several occasions as one of a number of possible locations to be considered in future Facility Site Selection activities for the development of the Silver Spring Community Recreation, Senior, & Aquatics Center identified in the Montgomery County Recreation Facility Development Plan, 2010-2030. It is noted that the plan does not currently mention this possibility.

The Plan makes a recommendation that the community and recreation facilities currently at this location be improved, and the Department would be in favor of that recommendation.

Department of Health and Human Services  
February 3, 2016

To further promote our mission and County residents’ health and safety, the Department of Health and Human Services wishes to urge the planners to carefully consider the following as part of any new development or redevelopment efforts.

1. Development efforts should provide for affordable housing, including units that will be accessible to those with the most limited income. As noted in the plan, the Lyttonsville Sector includes a higher percentage of low income households than the county average. “The average household income in Greater Lyttonsville is $81,800, 62 percent lower than the county’s average of $132,000 in 2013.” [Greater Lyttonsville Sector Plan, page 13];

2. To address the projected needs of the community over the next 15 – 20 years, community development efforts should consider provisions for making it possible for community members to age in place. Only 20% of the current population of the Greater Lyttonsville Sector is over the age of 50. Forty-seven percent of the community is between the ages of 25 and 49, with a high concentration of young adults and families with children. [Greater Lyttonsville Sector Plan, page 13];
Developing the infrastructure to support aging in place will allow the current residents to more fully integrate into the community throughout their life. The Department urges planners to consider the World Health Organization’s “Age Friendly Cities Checklist” in planning for this community to maximize accessibility of services for all community residents;

3. Include not only green space in redevelopment and new development efforts, but also child friendly play areas with restrooms, water fountains and adequate seating options for adults who may accompany them. Providing a variety of interconnected active and passive recreation areas encourages a sense of community and aligns with the CDC Healthy Community Design Initiative;

4. Make efforts to improve pedestrian and bike safety on particularly busy roadways where pedestrians and bikes compete for road space, including separate and designated pedestrian, bike and vehicle lanes wherever possible to minimize the potential for accidents and injuries. Enhance the safety and connectivity of the Capital Crescent Trail wherever possible, including adding bridge crossing to particularly busy and/or dangerous intersections.

Department of Environmental Protection
February 4, 2016

1. Page 33 & 34: It is unclear why the use of only intensive green roofs is specifically mentioned. The use of extensive green roofs can also contribute to improved stormwater management.


3. Page 37: In 2015, DEP completed stream restoration along Donnybrook Tributary upstream and downstream of Grubb Road, as well as on the Rock Creek Pool property. DEP also installed stormwater management on the Rock Creek Pool property and in the right-of-way along Grubb Road. Permanent easements were created on the pool property for both stream restoration and stormwater management and we already expanded the riparian buffer along this Donnybrook tributary stream corridor. Recommend removing the bullet "The existing Rock Creek Pool site should be considered as a community facilities site....". Recommend modifying the bullet "...Therefore, stream buffer width may be modified if necessary to achieve the balance described above.” to describe DEP's completed Donnybrook stream restoration and Rock Creek Pool stormwater management improvements.
4. Page 40: The discussion of “complete streets” notes that this approach does not include “green streets” enhancements, such as stormwater management, as part of its primary objective. This appears to suggest that these concepts are at odds with one another. However, the street cross sections on subsequent pages indicate that incorporation of potential stormwater best management practices will be studied. The narrative on page 40 should be enhanced to further explain these issues.

5. Page 74: Second bullet, add: and a wide enough area for floodplain access.

6. Page 79: Add bullet: Evaluate right-of-way areas along the streets in the R-60 residential district for stormwater retrofit opportunities. To successfully daylight Fenwick Branch with a natural channel design, stormwater management will need to be added to this upstream drainage area.

7. Page 81: For your consideration, attached are some other photos of the NIH enhanced stormwater management pond that show the surrounding public walkway on the right side.

8. Page 81: Replace the Photo of ‘Proposed regional stormwater pond by MTA’ with the correct location circled. The photo on pg. 81 is of the WSSC parcel and not of Parcel #729. Below is what Parcel #729 looks like:

![Parcel #729 Image]

9. Page 84 & 95: Using green space along the CCT for stormwater is suggested. An assessment would have to be done on the amount of area that is left for this after the required stormwater
retrofits are put in related to the Purple Line. In addition, access needs to be considered for maintenance. Stormwater infrastructure along the CCT will require vehicles access.

10. **Industrial Areas**: In industrial areas that are to be redeveloped or redesigned, consideration should be given to something along the lines of a “stormwater park” like the Menomonee Valley Stormwater Park in Milwaukee (http://landscapeperformance.org/case-study-briefs/menomonee-valley-redevelopment). This is a park-like area dedicated to accepting stormwater from a large brownfield area that was being revived as industrial/mixed use, where instead of fitting ESD retrofits into the site where there wasn’t space, there was a collective park dedicated to a range of stormwater management that became a shared use stormwater park with lots of outdoor recreation and science study space. Possible locations include the open space of the industrial area south of Pitman, the industrial area south of Stewart, or on the open area of WSSC. This would likely require some discussion of land ownership, easements, or financial incentives, but could provide outdoor amenities/open space and free up areas for redevelopment through the concentration of stormwater management.
MEMORANDUM

February 1, 2016

TO: Greg Ossont, Deputy Director
    Department of General Services

FROM: Scott E. Goldstein, Fire Chief

SUBJECT: Greater Lyttonsville Sector Plan - Public Hearing Draft

Thank you for the opportunity to comment on the Public Hearing Draft of the Greater Lyttonsville Sector Plan dated December 2015.

Based upon staff review of the draft plan, I have the following technical comments to offer:

- Page 36, last bullet: Recommend deleting the word “safety;” thus wording it more appropriately as “fire and rescue.”

- Page 38, Public Safety:
  - 1st paragraph, 3rd sentence: Recommended revision: “Fire, rescue and emergency medical services apparatus from other nearby stations located in Silver Spring and Chevy Chase are also dispatched to the Greater Lyttonsville area when needed.”
  - 2nd paragraph: Recommended revision: “While no major renovation or expansion is planned for Station 19, periodic replacement of the station’s roof, generator, and HVAC system as well as parking lot resurfacing will occur as needed.” Also, recommend removing the 2nd sentence as it is unnecessary.
  - 3rd paragraph:
    - Recommended addition to the beginning of the 3rd paragraph: “The Fire and Rescue Service has plans to deploy an ambulance at Station 19 to enhance services to the community currently provided by the station’s paramedic engine and aerial tower.”
Recommended revisions to the sentence concerning specialized resources (i.e., ATVs) for response to incidents along the Purple Line and parallel trail system: Remove “pump insert” and replace with “fire suppression equipment.”

- Bullet (Plan recommendation) after 3rd paragraph: Recommend replacing the word “facilities” with “resources” for greater accuracy.

- Pages 51: Proposed sections (two shown) for Lyttonsville Road indicate a 10-ft through-lane and two 11-ft through/turn lanes. Large fire-rescue vehicles having widths of 10’2” from outside mirror to outside mirror would not fit in the 10-ft lane. All lanes should be a minimum of 11-ft and preferably 12-ft to safely accommodate large fire-rescue vehicles.

- Page 53: Proposed section for Lyttonsville Road at top of page 53 indicates two 10-ft through-lanes. Same concern as described for page 51.

- Page 63, Recommendations, 7th bullet: MCFRS does not support the recommendation for redesigned intersections that would result in reduced widths if the reduced widths would create difficulty for large fire-rescue apparatus with wide turning radii to make turns; thus delaying response.

- Page 79, 8th bullet: MCFRS does not support the recommended closure of Stewart Lane from vehicular traffic to/from Brookeville Road as it would cause responding fire-rescue apparatus to seek a longer route of travel to incidents occurring in the vicinity of the closure. This would directly and negatively impact response of apparatus from Fire Station 19 as they are first-due to this area and would typically approach the area from Brookeville Road.

If you need further information or have questions, please contact me on 240-777-2468 or Planning Section Manager Scott Gutschick on 240-777-2417.

SEG/sag/ld

cc: Scott Gutschick, Planning Section Manager, MCFRS
    Amy Donin, Planning Specialist, DGS
February 8, 2016

Casey Anderson
Chair, Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring MD 20910

Dear Mr. Anderson:

We appreciate the opportunity to review and provide comments on the Greater Lyttonsville Sector Plan prepared by the Montgomery County Planning Department dated December 2015. The Maryland Transit Administration (MTA) would like to submit the following comments.

MTA’s Purple Line team has a long history of working closely with neighborhood leaders and residents of the Greater Lyttonsville community throughout the planning, environmental review and design process for the Purple Line light rail line. This collaborative effort, which also has included Montgomery County transportation and community planners, has led to a design plan that will significantly minimize potential impacts to the community while helping to build on its existing strengths and amenities.

The MTA is pleased that the Planning Board recognizes the substantial potential for transit-oriented development and community revitalization in areas adjacent to the Lyttonsville and 16th Street/Woodside Purple Line stations. We strongly support the County’s goal and efforts to promote pedestrian-friendly mixed use, transit-focused development.

The following responses address recommendations specific to the Purple Line:

- It is the goal of MTA’s Art-in-Transit initiative to incorporate elements of Lyttonsville’s rich cultural heritage into the structural design of the Lyttonsville station (p.31). We look forward to including the local community in discussions with the artist.
- We fully support plans for the County or developers to provide a future pedestrian connection from Brookville Road to the Lyttonsville station platform via a mezzanine and an aerial walkway as part of future redevelopment (p.47).
- Purple Line plans do not include the construction of Kiss & Ride lots at any of the 21 stations along the alignment (p.47). However, we would be willing to coordinate with the Planning Department to accommodate such a facility in the future.
- The MTA would be glad to work with Montgomery County to recognize in the area of the 16th Street/Woodside station the tremendous contributions and tireless efforts of “Harry Sanders” in promoting the Purple Line project (p.47).
Improvements to infrastructure, such as new or improved sidewalks, the addition of bike lanes and pedestrian crossings that result in greater accessibility to Purple Line stations are encouraged by the MTA.

Regarding stormwater management plans at parcel #729, MTA would like to point out that the current plans for a proposed dry pond at this site are conceptual and preliminary. As you are aware, MTA’s P3 Concessionaire will complete the design of the entire system and develop a comprehensive stormwater management plan based on the current stormwater requirements and on the project’s need. Once a Concessionaire is selected, the Concessionaire will further evaluate potential options and begin to develop detailed design plans. As the Concessionaire resumes design, our Purple Line team will be happy to work with Montgomery County Planning staff and members of the Lyttonsville community on the design of the stormwater management facility.

Please note that a dry pond may or may not be the final solution chosen for the Lyttonsville area. However, MTA recognizes the importance of providing a well-designed and attractive facility that fits into the community’s landscape. In addition, an Interagency Work Group (IAWG), which will include representatives of MTA, the P3 Concessionaire and representatives from the Montgomery County Department of the Environmental Protection and DPS, is planned. This group will meet to discuss SWM opportunities prior to the Concessionaire’s submission of a SWM Concept Plan for approval by MTA’s Sediment and Stormwater Plan Review Program (p.81).

Thank you again for this opportunity to provide comments. If you have any questions or would like to discuss any issues in more detail please contact me at 443-451-3721 or at clattuca@mta.maryland.gov.

Sincerely,

Charles Lattuca
Executive Director, MTA Transit Development and Delivery