

From: [Phillip Staub](#)
To: [Christopher Davis](#)
Subject: 1455 Research Blvd
Date: Thursday, March 6, 2025 8:21:53 AM

WARNING - External email. Exercise caution.

Good morning,

I was happy to see in the newsletter that a developer is considering turning this property into much needed housing. I hope it can be used to address another need. I've lived in west end for 8 years. My property was very quiet at first. I could read on my back patio and only hear birdsong. Then the storage facility and shopping area across 270 and next to this proposed development were built. It acts like a satellite dish: reflecting so much highway noise that it can be plainly heard inside my home with windows and doors closed. I ask that any addition to this giant noise reflector be accompanied by a sound wall on the east side of 270.

Thank you,
Phill Staub
206 Upton



October 21, 2025

Mayor and Council of the City of Rockville
111 Maryland Avenue
Rockville, Maryland 20850

**Re: Urgent Request to Defer Residential Site Plan Applications in the Research
Boulevard Office Corridor Pending Comprehensive Plan Review**

Dear Mayor Ashton and Councilmembers:

Executive Summary

Meso Scale Diagnostics, LLC. ("MSD") respectfully requests that the Mayor and Council defer consideration of pending residential site plan applications in the Research Boulevard Office Corridor until the City completes a comprehensive planning review of this major land use shift.

Three projects totaling 761 residential units would replace more than 640,000 square feet of existing or planned office and laboratory space - contradicting the Comprehensive Plan's clear designation of this corridor for office, laboratory, and technology uses.

This is not merely a business concern. It is a question of whether Rockville will adhere to its Comprehensive Plan - or allow piecemeal residential approvals that undermine one of the City's most important employment centers without proper analysis, public input, or long-term planning.

MSD's Role And Investment In Rockville

MSD is one of the largest employers in Montgomery County and the largest employer in the Research Boulevard Corridor south of West Gude Drive, representing the very technology growth the Comprehensive Plan seeks to encourage. MSD currently employs approximately 1,140 people worldwide, including approximately 790 in Montgomery County of which 325 are located in Rockville. MSD owns 1601 and 1701 Research Boulevard, which together comprise more than 280,000 square feet and house its headquarters, laboratories, and manufacturing operations.

On August 28, 2025, MSD acquired four additional MXE-zoned buildings totaling 392,000 sq. ft. at 1801, 1803, 1901 and 1903 Research Boulevard for planned growth in research, product development, and manufacturing. These facilities will include a combination of clean rooms, analytical laboratories, and manufacturing space - precisely the uses envisioned by the Comprehensive Plan. MSD's significant August 2025

investment demonstrates that the Research Boulevard Corridor remains economically viable for office, laboratory, and technology activity.

The Pending Residential Applications

The following projects would transform the corridor's employment character:

- 1455 Research Blvd. (Pulte): Demolish 228,000 sq. ft. office building; construct 206 residential units
- 1600 Research Blvd. (Toll Brothers): Demolish 412,000 sq. ft. former Westat campus; construct 205 townhomes
- 1800 Research Blvd. (Lerner): Approved 350-unit condominium project at Gude & Research intersection

Combined, these proposals would remove over 640,000 sq. ft. of employment space and insert 761 housing units into the middle of Rockville's primary technology corridor.

Direct Conflict With The Comprehensive Plan

The Comprehensive Plan designates this portion of the Research Boulevard Corridor for office, laboratory, and technology uses - not residential development.

Approving these projects would:

- Contradict the City's adopted land use policy;
- Undermine years of community and professional planning input; and
- Set precedent for future residential encroachment across Rockville's employment corridors.

If the City believes conditions have changed, that determination must occur through the Comprehensive Plan amendment process - not through individual site plan approvals that effectively rewrite policy without public deliberation.

The "Office Vacancy" Argument Is Unsupported

Developers and staff have cited office vacancy as justification for residential conversion. This rationale fails for several reasons:

1. MSD's August 2025 expansion demonstrates that the corridor remains viable for high-value office and technology use.
2. The Comprehensive Plan anticipated office vacancy and called for analysis - not immediate conversion.
3. The affected buildings are modern and functional, not obsolete (e.g., 1455 Research Blvd., built in 1998).
4. No economic or fiscal study has been completed to assess the long-term impact of losing employment land.

5. The housing benefit is minimal - only 31 moderately priced units among all three projects.

This is not a strategic response to vacancy; it is ad hoc redevelopment inconsistent with adopted policy.

Incompatibility Of Residential And Technology Uses

Introducing large-scale housing adjacent to active biotechnology and manufacturing facilities will create ongoing operational conflicts:

- Future zoning and site restrictions will limit business flexibility and expansion;
- Additional residential traffic will worsen congestion during peak delivery and shift-change hours; and
- Approval would establish precedent for further erosion of employment corridors citywide.

Once employment land is converted to residential use, it cannot be recovered when demand for commercial space returns.

Economic Impact

These conversions carry substantial economic risks:

- Loss of commercial tax base and high-wage employment
- Reduced daytime population supporting local retail and services
- Damage to Rockville's reputation as a business-friendly city
- Long-term constraints on economic growth and diversification

The Comprehensive Plan's vision for this corridor - anchored by office, laboratory, and technology uses - remains sound. MSD's recent expansion affirms this viability.

The Proper Path: Comprehensive Plan Review

If the City wishes to reconsider residential use in this corridor, it should first:

- Initiate a Comprehensive Plan amendment study assessing economic, fiscal, and infrastructure impacts;
- Engage stakeholders including Rockville Economic Development, Inc. ("REDI"), corridor employers, and residents; and
- Develop a cohesive vision for any future land use transitions.

That process - not site-specific approvals - ensures transparency, policy consistency, and long-term economic balance.

Requested Action

MSD respectfully requests that the Mayor and Council:

1. Defer consideration of the 1455 and 1600 Research Blvd. residential applications pending comprehensive review.
2. Initiate a formal amendment study for the Research Boulevard Corridor.
3. Engage REDI and corridor businesses in evaluating economic impacts.
4. Provide direction to the Planning Commission that applications inconsistent with the Comprehensive Plan should not be approved.
5. Meet with MSD leadership to review our expansion plans and discuss these issues in detail.

Conclusion

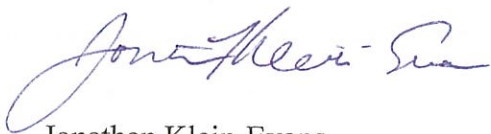
MSD supports thoughtful housing growth but not at the expense of Rockville's long-established employment corridors.

The Research Boulevard Corridor remains a viable, strategically located hub for office, laboratory, and technology uses. MSD's ongoing investment demonstrates that success. Approving residential projects now would erode that foundation and jeopardize future growth.

We urge the City to uphold its Comprehensive Plan, defer these applications, and conduct a proper, comprehensive review to ensure any changes are deliberate, data-driven, and in the community's long-term interest.

Thank you for your consideration. MSD stands ready to participate constructively in this process.

Respectfully submitted,



Jonathan Klein-Evans
General Counsel

cc: James Wasilak, Chief of Zoning
William Chen, Esq.
Chris Davis, Senior Planner

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March 18, 2026

Email: developmentreview@rockvillemd.gov

Rockville Planning Commission
i/c/o Chris Davis, Project Planner
Rockville City Hall
111 Maryland Ave.
Rockville, MD 20850

Re: Comments to Site Plan No. 2026-101-STP

Dear Planning Commission,

My name is Grant Amadeus Giel, writing from the Law Office of G. Macy Nelson on behalf of Meso Scale Diagnostics, LLC (“Meso”). Meso owns the property located at 1601 Research Boulevard, directly adjacent to the lot located at 1455 Research Boulevard and contemplated for development in Site Plan No. 2026-101-STP (“Site Plan”). We offer these comments in opposition to the Site Plan.

First and most importantly, the Site Plan as designed is contrary to the Rockville 2040 Comprehensive Plan (the “Comp Plan”). Planning Staff appears to have recognized this as well, stating that “[r]esidential uses are not recommended in this land use designation. In addition, this chapter also states that ‘the Research Boulevard’ corridor should remain focused on employment-generating office and commercial development.” However, Staff then contorted into a position to endorse it anyway on the auspices that there is a “high vacancy rate among office spaces in the City.” We believe that thought process is short-sighted, especially in contrast to a plan published *after* the height of COVID that is intended to direct growth for the next decade or more. What uncertainties exist in real estate markets in the inner DMV area as a result of federal policy are also likely fleeting, while developing this lot into townhouses will foreclose employment expansion opportunities indefinitely and make it more difficult for existing employers in the area—my client included—to expand their footprint and hire more workers. The City needs a robust working tax base as much as it needs housing security, and cannibalizing some of the only dedicated office-oriented land in the City is contrary to long-term planning both conceptually and specifically as stated in the Comp Plan.

The admonition in the Comp Plan against turning this lot into a single-use residential lot is not a passing gesture. Goal 5 of the Comp Plan lays out the precise aim to “Encourage and support office clusters in areas with good regional access,” stating that office uses in the City “help to fund City operations through property taxes, provide employment, and add to the vitality of the city and its commercial businesses.” Comp Plan at 41. It specifically states that the “success of office development along Research Boulevard . . . is due in no small part to the forethought of City leaders expressed in the 1960 and 1970 master plans that designated these areas for ‘restricted industrial’ uses in the era of I-270 expansion.” *See id.* As further summarized, it took many decades for that land to become fully built out at the height of the dotcom boom in the 1990, and that the office market is generally cyclical. *See generally id.* Action 15.3 states that the City should “Retain the majority of land in the Research Boulevard corridor for office uses as shown on the Land Use Policy Map,” and Action 15.5 states that the City should “Explore the best methods for encouraging and preserving office land uses in those areas mapped for Office (O) on the Land Use Policy Map.” *See generally id.* To the extent that it endorses conversion to other land uses *at all* in Action 15.6, it only advocates for those changes in areas without access to regional transit systems, which is certainly not the case with Research Boulevard. *See generally id.*

Later, the Comp Plan states that it is intended to “[a]ctively support Rockville as a center for innovative technologies, creative industries life sciences, advanced research, and cybersecurity,” specifically identifying Research Boulevard as being “designated to accommodate this demand” while trying to contend with the fact that the “federal government shrunk its building footprint, and older buildings became functionally obsolete.” It addressed this shrinking footprint presciently and stated that it partnered with the Urban Land Institute (“ULI”) to review the matter, with the ULI recommending “targeted investment, to remain a strategic employment center for the city,” and the Comp Plan endorsing such course of action. *See* Comp Plan at 179. Its recommended actions, so summarized, are to build up public-private partnerships with relevant office-oriented companies and academic institutions, and consequently develop an action plan to “focus on the retention and growth of office uses and businesses.” *See id.*

Lastly, the Comp Plan focuses, on Page 384, on Planning Area 15, known otherwise as the “Falls Grove and Research Boulevard” area. It describes there a “development pattern along Research Boulevard [is] of office, laboratory, and medical research buildings on large lots,” and that the tenants have been operating there for decades as designed. The key issue relevant to this Site Plan was to “[c]onsider the future of the Research Boulevard corridor as a cluster for research and development, laboratory, and office uses.” Comp Plan at 385–86. Even the lower-quality Class C buildings that may be in need of extensive renovation have thus far maintained an office-like characteristic, such as storage facilities. Conversely, the area is underdeveloped for walkable food and beverage establishments and generally poor sidewalk quality, requiring people working (or living) in the area to often

drive away to access those amenities. *See generally id.* at 386. The only areas targeted for active redevelopment are to the north of my client's property at 1600 Research Boulevard and already zoned explicitly as a mixed-use residential multiple unit district, so even if it were the case that there were inexorable market pressures compelling the approval of townhouse development, the Comp Plan has identified a substantial portion of Area 15 that is appropriate for the same. Meanwhile, "[t]he Research Boulevard corridor should remain focused on employment-generating office and commercial development," with amenities only to be introduced if they "support and complement office and commercial uses in the area" and residential development to be limited to those "properties facing Shady Grove Road that are appropriate for mixed-use development." *Id.* at 388.

At no point anywhere in the Comp Plan does it identify 1455 Research Boulevard—an explicitly office-identified parcel—as being appropriate for residential development. It could not be clearer, when reading both the thrust of the Comp Plan and the specific directives thrice over, that 1455 Research Boulevard is an entirely inappropriate lot to convert to townhouse residential use. The fact that the reason for this change is, per the statements of Planning Staff, to "recognize that there is a high vacancy rate among office spaces in the City" is anathema to the Plan, which precisely addresses (1) That development is a long-term focus that should not be upended with short-term stopgaps; (2) That specifically the development of Research Boulevard *would not have happened* had staff in the 1960s and 70s pushed for residential development; and (3) That the concern of "vacancy rates" has been an ebbing and flowing issue in the area for half a century and is of no import in upending the Comp Plan's directives. It is a solution in search of a problem, rather than the patience exemplified in the Comp Plans (and master plans generally throughout Maryland). This Site Plan is not "partially consistent with the City's Comprehensive Plan." *See* STP Staff Comments at 3. It's not consistent at *all*.

And it is not a harmless error, either. It has been the law of the land for decades that a local ordinance may elevate a master plan to the level of binding law rather than mere recommendation. "In the context of subdivision matters, it is equally well established that the recommendations of a master plan may be binding to the extent there is a statute, regulation, or ordinance requiring that a proposed subdivision conform to the master plan." *Maryland-Nat. Capital Park & Planning Comm'n v. Greater Baden-Aquasco Citizens Ass'n*, 412 Md. 73, 100 (2009). "Where [statutes or local ordinances linking planning and zoning] exist, however, they serve to elevate the status of comprehensive plans to the level of true regulatory device." *Mayor & Council of Rockville v. Rylyns Enterprises, Inc.*, 372 Md. 514, 530 (2002). "Proposals for land use contained in a plan constitute a non-binding advisory recommendation, *unless* a relevant ordinance or regulation, or specific zoning, subdivision, or other land use approval, make compliance with the plan recommendations mandatory." *Cnty. Council of Prince George's Cnty. v. Zimmer Dev. Co.*, 444 Md. 490, 522 (2015) (emphasis added).

The current Zoning Ordinance makes such statements several times in the context of general development and even mixed-use land specifically. Section 25.01.02 states that the “purpose[] of this chapter [is] to . . . [e]nsure that development occurs in an orderly fashion consistent with the master plan (the “plan”) and the availability of adequate infrastructure capacity and other public facilities.” Likewise, in Section 25.01.04, the Zoning Ordinance states that “[t]he provisions of this chapter are adopted in accordance with the master plan, and as the plan may be amended from time to time,” and this stricture is only abrogated if the “Approving Authority finds that events have occurred or circumstances exist to render such compliance inappropriate with respect to such application.” To wit, no such finding has occurred. Furthermore, the purpose of mixed-use zones (which include all office zones as part of “Mixed-Use Business”) in Section 25.13.01 is to “promote a variety of uses in close proximity to each other in compliance with the master plan’s recommendations.” Lastly, Section 25.07.01.a.3 states, as part of its required findings, that the “Approving Authority [must] find[] that the application will not . . . [b]e in conflict with the [Master] Plan.” As this Site Plan was developed and submitted under the current Zoning Ordinance and any alterations have not yet passed, it should be incumbent upon the Commission to reject the Site Plan even if there are looser standards in the New Ordinance.

Beyond our concerns with the clear contradiction within the Comp Plan, we also believe the Site Plan as presented falls short of several developmental aims that would frustrate both neighboring landowners and townhouse inhabitants in the event that it were approved. As Section 25.07.01.a.3(a)vi requires the Commission to only approve a Site Plan if it does not “[c]onstitute a violation of any provision of this chapter or other applicable law,” violation of bulk regulations constitutes independent grounds to reject this Site Plan. Particularly, Section 25.13.05.c.2 requires a minimum first-floor ceiling height of 15 feet, which the Applicant admits it does not provide for in this Site Plan on page 5 of its Project Description. Its stated rationale that “conversion of the Project to accommodate any non-residential use is improbable” is unsupported and should not be adopted in lieu of a variance. Staff comments identify several other distinct issues with the Site Plan that we reiterate, such as the failure to provide public use space within the right-of-way (Staff Comments, Page 15), failure to satisfy landscaping requirements (Staff Comments, Page 17), failure to satisfy road code requirements for road design and lack of visitor parking (Staff Comments, Pages 30 and 37), inadequate setbacks for various units (Staff Comments Page 2, Section V), and the Recreation and Parks Strategic Plan calls for parkland within a 10-minute walk of residential properties (Staff Comments, Page 7), which is also reiterated in spirit throughout the Comp Plan.

There are also multiple sections of inadequate information, such that we cannot know what the Applicant is proposing or why. For example, there is no justification as to why woodland cannot be preserved/restored onsite and why a fee-in-lieu is required instead (Project Description, Page 11), and the separate review of the forest conservation plan

leaves this submission ambiguous (Staff Comments, Page 17). There is no noise study provided, which is imperative for a residential development in a predominantly office-oriented space (Staff Comments, Page 11), and there is also no sight distance study (Staff Comments, Pages 38–41).

Lastly, and notwithstanding the Comp Plan’s reiteration of this principle, the actual Zoning Ordinance itself clearly calls for this zone to be predominantly office-oriented and only provide residential uses as incidental/accessory uses on higher floors. As shown in Section 25.13.07.c, the Mixed-use Employment Zone is “intended for areas that are either currently developed or are recommended for development primarily for office and industrial park uses,” and “[t]he ground floor may contain retail and other commercial uses along those streets designated in the plan as major pedestrian spines, [while t]he upper floors may be additional retail, office, residential, or a combination of uses.” Residential uses are only “allowed in those areas recommended for such uses in the relevant plan,” or where the Planning Commission determines that the “use is compatible with adjoining and confronting uses by means of landscaping, screening, or other measures.” We do not think such a finding is appropriate in this case. Meso *is* the adjoining use. The landscaping and screening as proposed is lackluster, and this project interferes with our capacity for future expansion, in accordance with the Comp Plan’s directive to “focus on the retention and growth of office uses and businesses.” Comp Plan at 179. Even if it weren’t clearly and repeatedly stated throughout the Comp Plan that this lot should be focused on office development and that it is unwise to rush in townhouses because of a short-term market hiccup, it would still be inappropriate to develop this specific project when considering the surrounding uses and the designs presented.

For all these reasons, we ask that you disapprove the Site Plan No. 2026-101-STP for 1455 Research Boulevard.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Grant Amadeus Giel', with a stylized flourish at the end.

Grant Amadeus Giel

cc: SFinger@meso-scale.com
cdavis@rockvillemd.gov
sryan@rockvillemd.gov