

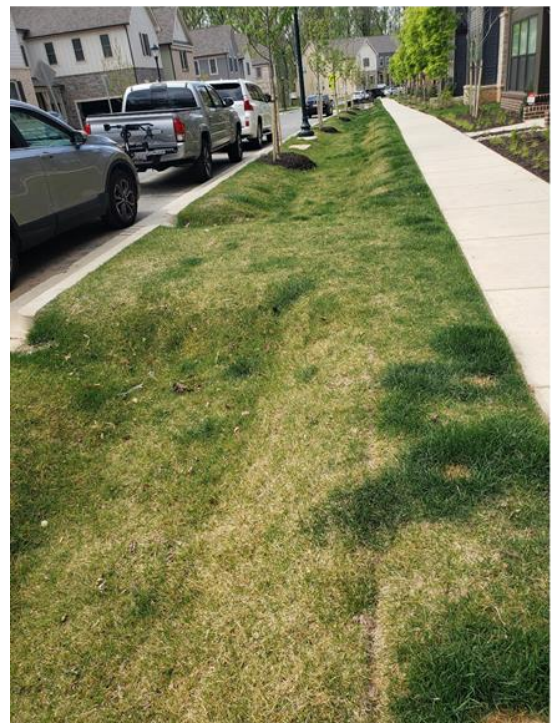
**COMMENTS ON PROPOSED ZTA FOR THE RESERVE AT TOWER OAKS COMMUNITY**  
**City of Rockville Planning Commission**  
**By Storm Water Management Committee of Tower Oaks Homeowners Association,**  
**February 12, 2025**

The Storm Water Management Committee (SWM Committee) of the Homeowners Association of the Reserve at Tower Oaks submits these comments on Zoning Text Amendment TXT 2025-00269. We ask the Planning Commission to postpone final action, in particular on the accompanying parking plan, to consider the impact other pending changes in the community would have on street parking.

Please note that while our homeowners' association had made the homeowners generally aware of the pending zoning text amendment (ZTA), we did not know that it would affect parking until the Mayor and Council meeting of January 13. At our request, the City has provided more information, and we hope that meetings with City staff will further clarify some of the issues.

The ZTA would amend Chapter 25, Article 16, Section 25.16.03 of the zoning ordinance to allow (retroactively) allocated street parking in a ratio as low as 0.5 spaces per unit in new developments as long as there is a bus stop within a .7-mile walking distance. This amendment is addressed to our already-built development. It would permit a parking plan with significantly decreased parking ratios compared to the ratio shown in the City-approved site plan that homeowners signed as part of the development standards incorporated into our buyers' contracts (0.66 spaces per unit).

The Committee supports the amendment to the extent it addresses problems with the town home garages of the Moderately Priced Dwelling Units (MPDUs) and offers relief to the MPDU owners. But as to parking, two other problems with design created unexpected and unnecessary challenges for all our residents: (1) bioswales make it dangerous to walk from our homes to the street and (2) visitors as well as homeowners already have a difficult time finding parking.



The Board of the Homeowners Association and the SWM Committee have been negotiating with the City and EYA for more than four years for safe crossings across the bioswales (ditches) that run parallel to most of the townhomes, between the townhomes and the street, as shown in the photo. These ditches are part of our storm water management system, and they make going from the street to the sidewalk not only dangerous for many of us, but in fact impossible for people with

mobility or vision limitations. We must go out of way an unreasonable distance to go to or across the street from our homes or to be picked up or dropped off.

EYA has agreed to install some paved crossovers, and there will be no street parking allowed in front of those crossings that have curb ramps. Without mitigating measures, which we would like to explore with the City, these changes will further decrease available street parking, which already is inadequate. Approving the decreased on-street parking ratio that is part of the ZTA would be premature and would prejudice resolution of these issues.

Specifically, we anticipate that five or more parking spaces would be lost with curb ramps at the accessible crossings, and more with parking prohibited at all crossings, including the flat grassy crossings as shown in the photo above. (No one can use a crossing if a car is parked on the street in front of it.) In addition, our counts show that because of haphazard parallel parking in unmarked spaces, total available parking already is decreased from the approved parking plan by about eight spaces. Parking space numbers will be further reduced when a loading zone is provided near the community building, as shown on the official approved plans. The community also needs more than one accessible street parking space for its 375 homes.

Once these issues are resolved, the parking provided may not even meet the proposed standards of 0.5 spaces per unit.

There are other issues with the ZTA's parking scheme. First, it allows decreased parking numbers when there is a bus stop less than .7 mile away. The reasoning is that if residents and visitors can take a bus, they do not need or will not drive as many cars and thus will not need as much parking. But this stop serves only one bus line, #81, a Ride On bus that runs only on weekdays and only during rush hour, and less frequently on holidays. It goes to two Metro stations, and the bus trip takes 27 to 41 minutes vs. a car trip of six to 12 minutes. Of course, the service could be terminated or changed at any point, especially with potential cuts to transportation funding. The bus is not a dependable or convenient alternative to adequate parking.

We also question whether the existence of the bus stop meets the City's own criteria for reducing the parking ratio. Section 25.16.03 (h) of the zoning ordinance allows parking reductions if a transit station entrance (not a bus stop) is within seven-tenths of a mile or if there are three bus routes in the immediate vicinity. The latter possibility was not addressed in the study.

There are also several problems with EYA's parking study submitted in support of the proposal. First, it seems based on different numbers of planned and existing parking spaces from those shown in the City-approved plans. Second, it was conducted on August 27, 28, and 29, 2023, the Sunday through Tuesday before Labor Day. During that week, street parking was probably the least occupied of the entire year, because many people would have driven their cars to the beach or other locations for vacation (the week before school started). The study also does not take into account whether some parking areas were actually full but could not absorb more cars because of haphazard parking in unstriped spaces (e.g., there are spaces planned for ten cars, only eight cars were parked, but they were parked in a way to leave no room for more cars). Our own informal surveys show a much lower

parking availability rate, and we know from experience that visitors have difficulty parking close to their destination on holidays and weekend evenings in particular. Service people often park illegally for the same reason.

Another reason for our crowded parking is that even though they have two-car garages, some of the townhomes and single-family homes house an adult couple and their adult child, each with a car; so one car must be parked on the street. In our row of six town homes, at one time three of the homes housed three adults with cars. With many workers in the area now at risk of losing their jobs with the federal government, or with NGOs or other entities that rely on federal funds, we can anticipate more young adults or young families may be moving in with their parents, as we saw during COVID, exacerbating the parking situation.

It is important to reconcile all these concerns soon, so that further zoning amendments are not required in light of the future bioswale crossings and other factors affecting parking. We would like to explore possible approaches to ensuring adequate and more efficient parking at Tower Oaks. These might include the following:

1. Marking (striping) the parallel street parking spaces for more efficient use of the spaces.
2. Allowing some spaces to be shorter than the standard 21 feet, perhaps with some spaces for smaller cars, with accompanying pavement markings and/or signs.
3. Designating some spaces for visitors only, not for homeowners.
4. Removing the current “no parking” signs on Royal Fern Place by Preserve Parkway and allocating those as long-term residential parking, freeing up more central parking spaces.
5. At the accessible bioswale crossovers, allowing for perpendicular curb ramps and decreased width at the bottom of the ramp, to minimize space taken from parking.
6. Installing parking areas on both sides of some streets, which would entail one-way traffic on those streets.

We seek a brief delay so that the City can bring all parties together to cooperatively resolve these questions with a comprehensive approach and then move forward quickly. Until all these related issues are addressed, we cannot know whether the ZTA will indeed support adequate parking for our community.

David Saffan, Alan Ispass, and Irene Bowen on behalf of the Stormwater Management Committee