



C. Robert Dalrymple, Esquire  
[bdalrymple@sgrwlaw.com](mailto:bdalrymple@sgrwlaw.com)  
Direct Dial: 301-634-3148

Matthew M. Gordon, Esquire  
[mgordon@sgrwlaw.com](mailto:mgordon@sgrwlaw.com)  
Direct Dial: 301-634-3150

July 25, 2022

**Via Email**

Mr. Gabe Alborno, Council President  
And Members of the County Council  
Council Office Building  
100 Maryland Avenue, 4th Floor  
Rockville, MD 20850

Re: July 26, 2022 County Council Public Hearing (Zoning Text Amendment 22-05, Signs – the “ZTA”); Washington Property Company’s Written Comments

Dear Council President Alborno and Councilmembers:

On behalf of Washington Property Company (“WPC”), we offer the following comments in support of the ZTA as it will comprehensively update Division 6.7 of the Zoning Ordinance (the “Sign Ordinance”) to streamline economic development and growth in Montgomery County. WPC is the owner and developer of over 2.5 million square feet of multi-family and commercial development throughout Montgomery County, including a variety of mixed-use projects in the Silver Spring, Bethesda and Wheaton Central Business Districts.

Through its experience delivering mixed-use projects in transit-oriented locations in the County, WPC frequently encounters outdated standards in the Sign Ordinance that constrain its ability to provide compatible and effective wayfinding signage in the Commercial/Residential (“CR”) Zones. More specifically, Section 6.7.9.A.2.a. of the Sign Ordinance currently provides that “[o]ne sign is allowed for each customer entrance. A customer entrance includes, but is not limited to, a direct outside entrance to a shop or store, and a direct outside entrance to an enclosed mall or shopping center.” While it is often most effective to provide signage immediately adjacent to a building’s customer entrance, there are instances in urban settings where it is necessary for effective wayfinding to provide a wall sign in a location that is not immediately adjacent to the customer entrance. In these instances, the property owner must obtain approval of a sign variance from the Sign Review Board to allow for a wall sign on a non-customer entrance frontage, which results in delay and additional cost burdens.

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**Selzer Gurvitch Rabin Wertheimer & Polott, P.C.**

4416 East West Highway • Fourth Floor • Bethesda, MD 20814-4568 Phone:

(301) 986-9600 • Fax: (301) 986-1301 • Toll Free: (888) 986-9600

[www.selzergurvitch.com](http://www.selzergurvitch.com)

Consistent with the ZTA's stated goal of streamlining business development and growth in the County, WPC requests that proposed Section 6.7.12.A.2.a be revised to create additional flexibility for wall signage to be located on a non-customer entrance elevation in limited instances. By way of example, there are a number of infill redevelopment projects in the urban core of the County that have frontage on public/private alleys and more heavily travelled major highway, arterial and business district streets. In order to create a vibrant mixed-use environment, these projects may have a customer entrance to multi-family, retail or other commercial uses along the building frontage of an alley. However, such buildings typically have stronger street presence and visibility along a major highway, arterial or business district street due to the high volume of pedestrian activity in the County's CBD's. Absent a revision to the current standard for wall signage in the CR Zone (which is proposed to be maintained with the ZTA), property owners are required to decide between: (a) placing the wall sign along a less visible alley frontage adjacent to a customer entrance; or (b) seeking a sign variance to allow for placement of a wall sign along the more heavily traveled frontage of the building that is intended to promote wayfinding, economic development and efficient pedestrian circulation patterns.

Based upon the foregoing, we respectfully request that Section 6.7.12.A.2.a of the ZTA be revised as follows (proposed additions underlined below):

2. Wall Sign

a. One sign is allowed for each customer entrance. A customer entrance includes, but is not limited to, a direct outside entrance to a shop or store, and a direct outside entrance to an enclosed mall or shopping center. Where a building includes a customer entrance along a public or private alley, the allowable wall sign for such customer entrance is permitted to be placed on a non-customer entrance frontage to enhance wayfinding, provided that such frontage abuts a major highway, arterial or business district road.

We believe that this additional revision will further the goals and objectives of the ZTA. We thank you for your time and consideration reviewing these written comments and are encouraged by the ZTA as a positive policy change to streamline and enhance economic development opportunities in the County.

Very truly yours,

**Selzer Gurvitch Rabin Wertheimer  
& Polott, P.C.**

*C. Robert Dalrymple*

By: \_\_\_\_\_

C. Robert Dalrymple

Matthew M. Gordon

By:

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Matthew M. Gordon

cc: Ms. Livhu Ndou  
Ms. Cindy Gibson  
Bobby Akines