

Gateway to Frederick

Studies and reports have unanimously defined the desired character of the Brickworks Development as an extension of Historic Downtown

Over a 20+ year period, planning reports and studies are in consensus regarding key features needed for sites adjacent to Frederick’s historic downtown. The Brickworks development is considered a major gateway to Downtown, and sits adjacent to the Frederick Visitor’s Center and the MARC train station. Its 63 acres is the only large tract of open land adjacent to downtown. Along with our team of planning and design advisors, East Frederick Rising considered eight key documents - all funded and sponsored by the City of Frederick and/or East Frederick Rising - issued between 2001 and the present. From what these sources recommend for East Frederick, it is our position that the master plan submitted by Greenberg Gibbons fails to deliver the key features necessary to execute the City’s vision. In fact, it could offer the opposite.

Brickworks Property



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Downtown Frederick



Greenberg Gibbons Proposal

A summary of 20 years of studies and plans



2001 East Street Extension Plan: Around 1999-2000 the State Highway Administration moved to replace the I-70 Market St interchange with a new interchange that would connect to a southward extension of East St. In 2001 an East Street Extension Phase 1 Area Plan¹ was put together by consultants Design Collective and Seth Harry Associates after extensive interviews, interactive public forums, and a multi-day charette. This Phase focused on the area north of South St so

does not cover the Brickworks site. But it emphasized what all subsequent reports have continued to advocate -- the value of extending outward the downtown historic district's form and character: “The

¹ <https://www.cityoffrederickmd.gov/DocumentCenter/View/798/2001-East-Street--Corridor-Plan?bidId=>

ability to retain the integrity of the area's heritage, while providing new construction and development opportunities, will enable Frederick to offer to and attract both visitors and residents a unique opportunity of visit and live in a working, historic city." (p10)

"Though not included within the scope of the Phase I master plan study, the significance of Frederick Brick Works development area creating a seamless transition to Historic Downtown should not be overlooked. Whether big box, highway-oriented development or finer-grained mixed-use development, the Phase II will substantially define the visitor arrival experience. Further evaluation will be required to ensure a consistent and appropriate gateway approach for pedestrians, vehicles, residents and tourists... " (p40)

2010 East Frederick Rising: East Frederick Rising's 'A Vision for the East Frederick' (EFR-2010) report in November 2010 reinforced this theme. ² It says the downtown historic district's pattern is "an excellent model that should be expanded upon and emulated on the East Side."³ That model consists, the report says, of "a blend of retail, office, civic and residential" typically brick, two and three stories, frontages at the edge of the sidewalk forming a clear 'street wall.' With streets about 60' wide and a 2/1 width/height ratio, this creates "a very pleasant pedestrian environment." It also said: 'place-making' can draw on the historic pattern in which buildings cheek by jowl and with no setback are interchangeable between commercial and residential uses. On-lot car parking should be located behind buildings serviced by alleys. Streets should have generous sidewalks and street trees for an active street life. Such 'livable' streets needed short blocks on a grid system. The concept needed to be fleshed out in a Small Area Plan.



2013 Urban Land Institute: ULI, the Washington-based land use thinktank, put together a panel that explored the potential of the eastside of Frederick in 2013.⁴ After research and a variety of meetings the ULI 'technical assistance panel' (TAP) reported on the strengths and weaknesses ('challenges') of East Frederick for private investors. They saw strengths in local civic pride, downtown shopping and

ULI Washington

Technical Assistance Panels (TAPs)



visitors attracted to the downtown. In a presentation they envisaged the Brickworks being developed "pedestrian friendly, residential with (street) grid" in the north but a 'lifestyle center' commercial with more "auto-dependency" near Monocacy Blvd. (p27) Elsewhere they proposed a small lake and "high density residential with ground floor retail." (p28) Streets should be "Context sensitive, livable, walkable, flexible, slow." (p38) In their

² <https://www.businessinfrederick.com/DocumentCenter/View/515/East-Frederick-Rising-Vision-Plan-2010>

³ EFR -2020 p8

⁴ <https://www.cityoffrederickmd.gov/DocumentCenter/View/8872/East-Frederick-Rising-ULI-TAP-Presentation?bidId=>

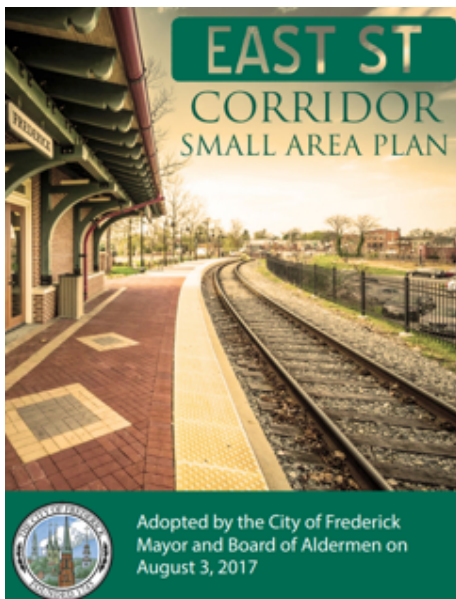
report⁵ the panel saw "low" demand for office space (p15) which makes a case for building office buildings that are convertible to retail and/or residential.

"Panelists immediately recognized the excellent and high quality of life that Frederick has to offer; the historic and built environment, combined with the natural environment and proximity to agriculture, is extremely appealing to current and potential residents." (p15) Extensions should "capitalize" on the downtown 'hip and artsy vibe.'" (p16) Because the area including Brickworks "is immediately adjacent to Historic Downtown Frederick, and has the potential to become equally vibrant, the panel envisioned (area) as an extension of downtown." (p22)



On streets: "Panelists advised that a much finer street grid is needed to promote walkability and emphasized that adding streets should be done in a context-sensitive manner to recognize specific site constraints and opportunities; new streets should appropriately match both the desired connectivity need and the existing infrastructure." p26)

2017 Small Area Plan setting the 'tone': The City Board of Aldermen in 2017 officially adopted the East Street Corridor Small Area Plan (ESCSAP-2017.)⁶ It says: "The extension of East Street to Interstate 70



provides the opportunity to 'set the tone' by creating a gateway and announcing that visitors have arrived at a special place." (p3-26) It expands a little on what this tone should be. Development should be "cognizant of the urban form already existing in the area and build upon that theme." It emphasizes the need for "a street grid with appropriate connectivity... as opposed to a standalone development." There should be "a mixture of housing types and uses..." The Complete Streets concept is invoked in which all modes -- vehicles, transit, bikes and pedestrians -- are catered to on most streets. (p3-29) The plan notes the 'industrial users' on the north of the site. Over time rising land values will likely find the industrial uses relocating and their properties will be redeveloped into higher value residential/commercial uses similar to the development all around. Meantime they can co-exist." The patterns of development in Downtown Frederick demonstrate that industrial and commercial uses can and do exist side by side with residential uses and thrive." (p3-23)

⁵ <https://www.cityoffrederickmd.gov/DocumentCenter/View/6863/East-Frederick-Rising-ULI-TAP-Report?bidId=>

⁶ <https://www.cityoffrederickmd.gov/DocumentCenter/View/9413/Adopted-East-Street-Corridor-Small-Area-Plan?bidId=>

The planning overlay our small area plan envisaged "should allow multiple uses on a site" while putting the onus on the developer to mitigate any adverse impacts. (p4-35) To make more walkable development, parking requirements should be reduced for projects within a 1/4 mile of transit, the Small Area Plan says. (p4-40)

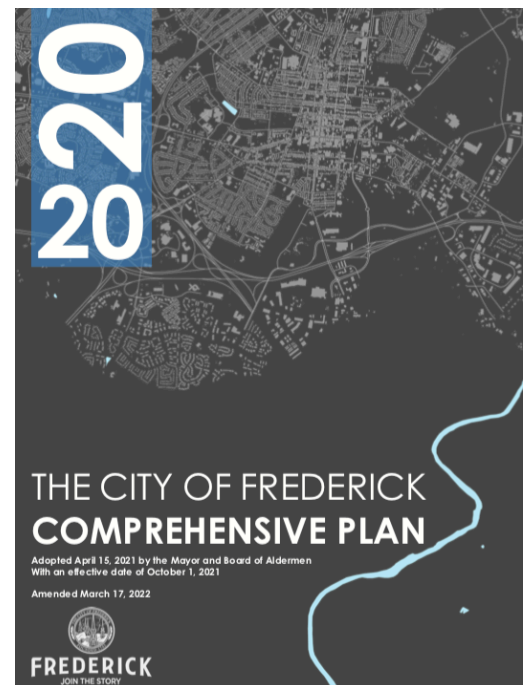
2020 Comp Plan: The 2020 City of Frederick Comprehensive Plan (Comp Plan)⁷ has a chapter (Ch 6) on Community Character and Urban Design: "The classic urban grid pattern with City blocks made up of long, narrow lots can be traced back to the City's original design and helps define downtown Frederick's unique character. Today, the downtown streetscape is distinguished by its compact buildings that front the public sidewalk. Driveways are rare and vehicular access is often limited to alleyways with detached garages located at the rear of individual properties." (p6-164)

Under the heading 'Guiding Design Principles for Consistent Urban Form' the 2020 Comp Plan states of building types: "When considering new construction and redevelopment, it is important that new buildings and additions feature massing and scale similar to the existing neighborhood." (p6-166)

Parking spaces required should account for the uncertainty of future demand, the value of land they occupy, walkability, and transit availability. Infill developments like the Brickworks "should contribute to a visually cohesive streetscape and should reflect the scale, setback and lot patterning that characterizes a neighborhood." (p6-168) "Stock" modern suburban architecture with large buildings set in extensive surface car parking is not wanted, the Comp Plan says (p6-169) because it evokes "a feeling of placelessness." (p6-169)

Traditional suburban zoning based on segregation of land uses obstructs sound urban development, the Comp Plan says, and mixed use, pedestrian-oriented development is now sought. (p6-170) The new Form Based Code (FBC) which sets down the required street types and building profiles, the Comp Plan says, is especially applicable in the East Street Corridor including the Brickworks site. In such denser developments:

- building frontages should make attractive 'street walls'
- frontage sizes should be scaled to generate the required urban character
- a heavy focus on pedestrian and transit needs
- parking concealed (p6-176)
- sidewalks wide enough to accommodate pedestrians, outdoor restaurant dining and ADA (disabled) needs
- blocks should be small to maximize street frontage and walkability, 1,800ft being the maximum perimeter



⁷ <https://www.cityoffrederickmd.gov/DocumentCenter/View/18902/2020-Comprehensive-Plan-Adopted>

- new streets to use the traditional grid pattern (p6-180)
- 'gateways' into neighborhoods should use landscaping, signage and art to set the tone for the place ahead (p6-182)

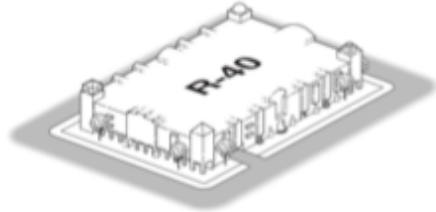
The Comp Plan has a Design Guide for Mixed-Use Development (Table 6-7, p6-184) the purpose of which is "to assist developers and property owners ensure compatibility" with the Plan and "support appointed (Planning Commission) board members and planning staff determine whether a proposal achieves the vision of the City." (sidebar p6-184) The Brickworks site is zoned Mixed-Use, MU-1, so Table 6-7 applies to this project. Its first Guideline begins: "1.1 New buildings are sited with minimal setback and oriented toward streets..." Picking others most applicable to the Brickworks site:

1.5 Buildings that are not immediately adjacent to public streets or internal drive aisles utilize the setback space for active uses (no TJ Drive style acres of purely decorative lawns)



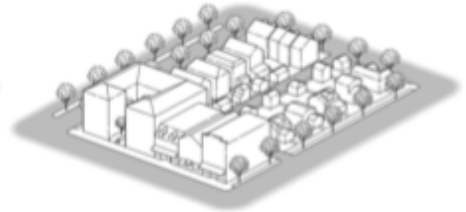
CONVENTIONAL ZONING

Density use, FAR (floor area ratio), setbacks, parking requirements, maximum building heights specified.



ZONING DESIGN GUIDELINES

Conventional zoning requirements, plus frequency of openings and surface articulation specified.



FORM-BASED CODES

Street and building types (or mix of types), build-to lines, number of floors, and percentage of built site frontage specified.

2.3 Adjacent development is connected through cross access or shared access agreements. If presently unattainable the site layout allows for future connections.

3.4 Locate and orient outdoor space to provide a focal point and be actively used.

5.2 Parking is situated (in) the interior of blocks

6.2 Variety in building forms shall be provided rather than regularized repetition.

6.3 Building frontages along a street shall include storefronts, bays, recesses, offsets, balconies, a varied and rich color palette, and other elements to avoid long, monolithic facades.

6.14 Design the ground floor of a building facade to engage the public realm and promote pedestrian activity.

Comp Plan housing policies emphasize the need for a variety of housing types matching residents' different income levels (HO Policy 1, 2, & 6, p9-225)

A measure of the importance of the Brick Works site is that it's the largest plot of downtown undeveloped land available for development as seen in this Comp Plan map (p4-123)

2022 East Frederick Vision Plan (EFVP):⁸ is the most recent and most detailed document providing guidance for the Brickworks development. Some 150 people -- citizens, consultants and City staff made an intense effort In August last year to work out the best form of development on the eastside, within which the Brickworks site is key. That consensus came from 25 meetings, visual preference polling, hands-on design workshops, small group sessions reporting to the large group, and major consultant work. (EFVP p10-16) A whole page of the EFVP (p5) is devoted to listing the 150 people who took part to underscore how vital community participation is to our city's design process. This was an all-out participative planning effort. The resulting Vision Plan proposes, once again, that the best of the historic downtown character should be embraced here: "Downtown is the model for the street and block network in East Frederick. Street-Space focused on people is the organizing principle and foundation for the East Frederick Vision Plan." (EFVP p23)

Intro: "The Vision Plan is specific in certain aspects: an interconnected network of pedestrian-oriented, tree-lined streets with wide sidewalks and on-street parallel parking, lined with multi-story (typically 2 to 6 stories) buildings that front and engage the street and sidewalk. The building functions will, overall, be mixed-use with loading and on-site parking set behind the buildings." (p2)

"An Exquisite Downtown": The Plan says downtown Frederick has a 'palpable' sense of place and that the key to this is the spatial enclosure of the streets: "The buildings and street trees work together to form a defined Street-Space. New streets and buildings in East Frederick may not have the patina of time or the same material qualities and handcrafted construction – but the Form-Based Code...will lay out a similar interconnected street and block network." (p9) A caption: "Downtown Frederick has a street-space that is rich in detail, culture, and variety. It has a beautiful and sustainable urban form." (p9)

Visual preference questionnaires used by the consultant (as shown in the graphic on the right) produced an almost unanimous preference for spatially enclosed streets and courts, and canopy street trees. There was less concern about density. (p13)

Major themes in the Hands-on Design Workshop included: keeping the Frederick character in new development, walkability, street trees and green open space, art, and housing for all income and

Public Kick-Off, August 12th

Visual Preferences

The exercise asked people to simply apply green dots on the environments they liked and red dots on environments they disliked. The exercise provided a clear aggregate picture of the positives (things to foster) and negatives (things to avoid).



Excerpts from the Visual Preference Exercise

⁸ <https://www.cityoffrederickmd.gov/DocumentCenter/View/20937/Charrette-Report/>

familial groups. (see List, p17) The 2022 Plan would amend the downtown street pattern in one respect for the Brickworks and other new east side streets. Sidewalks would be wider and there'd be more space for street trees, stoops, sitting places etc. while allowing a minimum clear space for people walking. (p23) The Plan lays out over several pages various Street-Space types applicable to East Frederick -- from 66' wide building face-to-building face (vs 60' for most existing downtown streets) through 62', 46', 37', 24' rights-of-way streets. (p25 to 29) These are derivatives of the street forms of the historic downtown streets -- intended to make contemporary adaptations while still replicating their feel and character.

Building frontage types are then spelled out, again derivatives of frontage types found in Frederick's historic district downtown:

- General Flex Frontage: buildings seen in the Court/Church/Carroll/All Saints densest portion of downtown, up to six stories, 11'-15' ceilings ground floor, full flexibility be condo/rental apartments, hotel, office, retail, restaurant, in any proportions that meet market demand, 15% private open space at ground level or on the building (p31)
- Storefront Frontage is very like East Patrick or North Market streets today -- quintessential American main street, storefronts on the sidewalk, 20' to 50' wide, 14' ground floor ceilings, 2 or 3 stories, office or residential above the store/restaurant/office on the ground floor, 10% minimum private open space (p32)
- Urban Neighborhood Frontage: townhouses or offices, often with ground floor up 4 or 5 steps from the sidewalk, 9' ceilings, allowing small offices, minimum 20% private open space (p33)
- Tech-Work Frontage: 14' ceiling ground floor, often single story sometimes 2 or 3, often have vehicular rollup door to street: workshops, repair shops, light industrial, commercial, but also make excellent funky office or residential, 25% open private space (p34)



A Downtown Street: new streets in East Frederick will have more space for the pedestrian realm. Including a dedicated area for street trees and 'amenities', an area along the building facades for stoops and dooryards, and a minimum clear uninterrupted sidewalk width.

Parking minimums: The Vision Plan calls for parking regulations to be "right-sized for the 21st century" by way of reducing or eliminating on-site/assigned parking place requirements, which waste so much land and distort investment. Parking must be mostly at the back of or inside buildings. (p49) Affordable housing will be assisted by economizing in parking costs. The same will happen if more buildings are allowed on a given tract of land, spreading the fixed costs over a larger number of houses, through enabling higher density.

Greater diversity of housing: "Frederick would benefit from greater diversity in its housing stock. Many households cannot afford single- family detached houses and don't need that much space." (p52)

2022 East Street Redesign⁹ (ESR): Carried out in parallel with East Frederick Vision Plan, the ESR focused on redesign of East Street itself, revising the cross-section with more logical vehicle lanes, adding bike lanes, sidewalks and landscaping. To make it a 'complete street.' Improved intersection designs attempt to minimize conflict between vehicles, bikes and pedestrians. Of most interest here is the ESR report's vision (p134) of East Street alongside the Brickworks site:

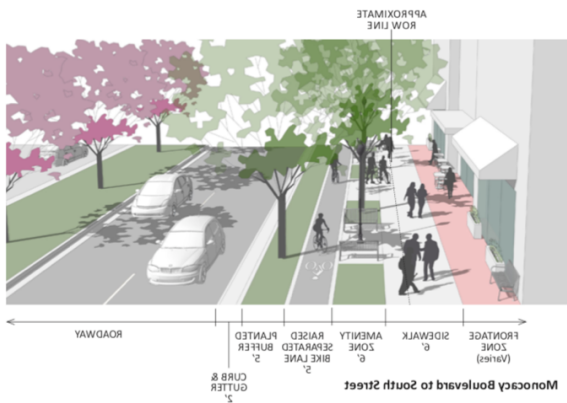
- "Gateways & Nodes: Evoke community identity at key orienting places such as intersection of primary streets that may include civic art, neighborhood markers, or other signature features
- "Future Building Frontages: Encourage active ground floor uses and pedestrian-oriented frontages along sidewalks"
- "Future Street Connectivity Opportunities: Emphasize a walkable grid of streets that unify existing and future development."



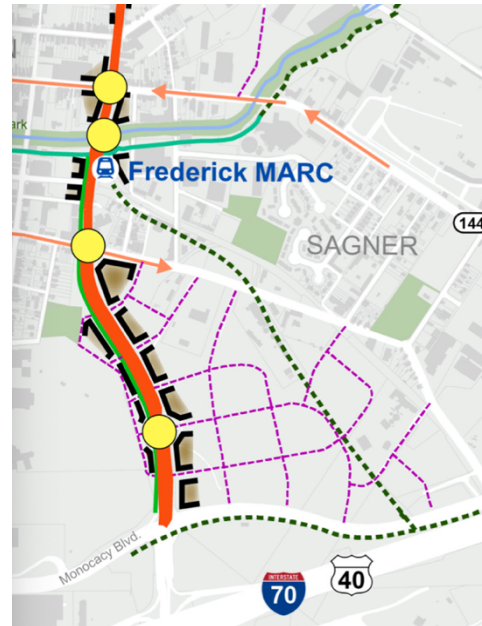
East Street from Monocacy Boulevard to South St would be planned to make use of the existing twin 12' vehicle lanes on either side of the landscaped median. (Proposed Typical Section above from p117) To the existing roadway would be added on each side bike lanes, landscape buffers, and sidewalks. With nearly continuous walk-up buildings near the edges of the sidewalk the result would be 'street

⁹ <https://www.cityoffrederickmd.gov/1570/East-Street-Redesign#:~:text=The%20East%20Street%20Redesign%20is,users%2C%20businesses%2C%20and%20residents%3F/>

walls' forming a very urban style street. ESR proposes about 120' between the building faces compared to the 60' to 65' downtown, but the street shape and feel would be similar.



Images show a view of half the street (p142) and the plan showing street walls and a street grid (p135)



Traditional Neighborhood Development: Ever since it was enacted in 2005 the City's Land Management Code at Sec. 411¹⁰ has provided for traditional neighborhood development (TND). Its purpose is stated: "The Traditional Neighborhood Development (TND) option is designed to permit the development of land in a manner consistent with the historic and timeless principles of Frederick's existing neighborhoods. A TND combines a variety of housing types with commercial and civic uses in a compact, walkable neighborhood setting. TND's feature a highly interconnected street network and setbacks appropriate to create a public realm built on a human scale." In Sec 411 (a) (1) Applicability and Approval Procedures it is clear TND can be applied to the Brickworks' existing MU-1 zoning. Sec 411 TND provisions are readymade for the Brickworks site. The Planning Commission could ask that they be applied in this case.

¹⁰ https://library.municode.com/md/frederick/codes/land_management_code?nodeId=ART4ZO_S411TRNEDET

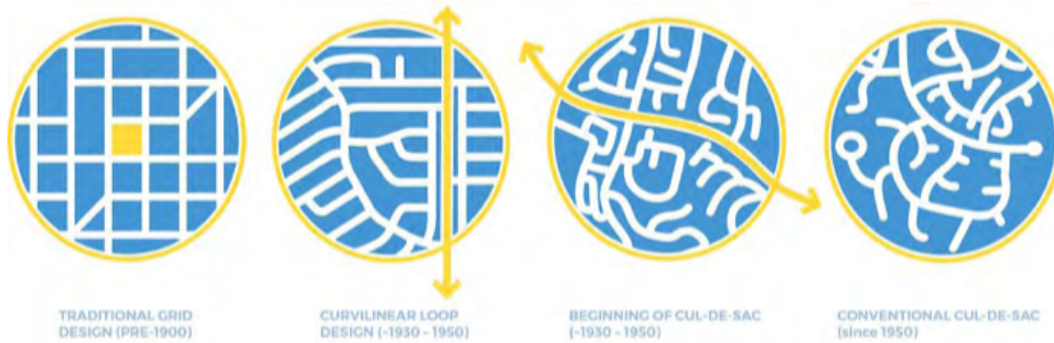


Illustration from the Congress for New Urbanism website.

Part of a broader worldwide movement: Traditional Neighborhood Development is part of an international planning and urban design movement which began as a reaction against 1950s strict land use segregation of building types by zoning. This led to huge slab apartment buildings in superblocks, tract 'slum' clearance, vast surface parking lots, big enclosed shopping malls, urban expressways, and the many curving streets and many more short cul-de-sacs of suburbia. In America TND is often traced back to the 1961 book 'The Death and Life of Great American Cities' by Jane Jacobs (1916-2006) of New York City. A freelance writer she was initially supportive of the planning orthodoxies of the day. But having moved into the old mixed-use neighborhood of Greenwich Village in Lower Manhattan she was struck by a rich network of interconnections that developed organically when people had shops and various services close by where they lived. She wrote about this eloquently coining the terms 'social capital,' 'the ballet of the sidewalk,' and 'eyes on the street' to describe the liveliness and spontaneous order established in the mixed-use 24-hour city street scene.

These ideas have become almost mainstream at least for central city areas via the Congress for the New Urbanism, Smart Growth America, and firms like Duany & Plater-Zyberk (DPZ) out of Miami FL, while internationally Leon Krier of Luxemburg was among the most famous advocates of a return to traditional development.

THE DEATH
AND LIFE
OF GREAT
AMERICAN
CITIES
JANE JACOBS

"Perhaps the most influential single work in the history of town planning...a work of literature."
—The New York Times Book Review

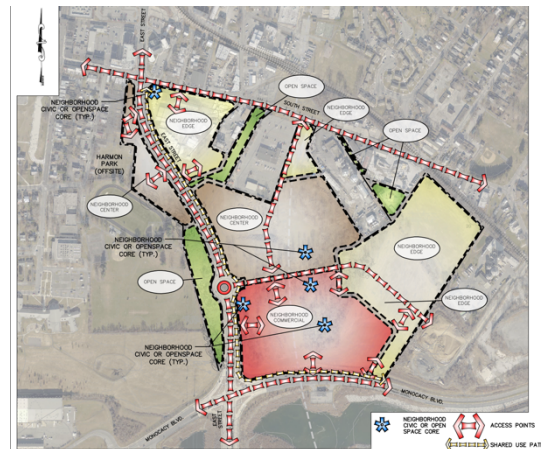
The kernel of the criticism of the Greenberg Gibbons proposal¹¹

In downtown Frederick the characteristic street is shaped by:

- buildings built mostly to the sidewalk (no front setback)
- building frontage continuous except for the occasional walkway ('dog run') at ground level
- varied buildings in architectural detail but 2, 3, 4, occasionally 5 stories, frontages 12' to 36' wide
- layered multi-use buildings with retail, bar, restaurant, office at street level and residential above
- roof variety from steep pitch to single low-slope to flat roof
- exceptions to these generalities making for visual interest and practical flexibility
- basements in use for mini-apartments, even restaurants
- private outdoor space, gardens, at the back of houses
- service access at rear of buildings via shared driveway or alley
- parking to the rear of buildings
- gridded street pattern that makes the city a walkable, connected network of communities

None of these key downtown design features is reflected in the Greenberg Gibbons proposal. Instead:

- buildings all set back from the sidewalk, even townhouses 10' or 20'
- setbacks to building frontages break up any street 'wall'
- mass produced standardized town houses
- apartment buildings and office buildings much larger than downtown (big boxes)
- no architectural variation except for MU-1 code required gimmicks like dormers/no dormers
- single use buildings, no layering of uses
- roofs 4/12 or higher slope, roof space wasted
- no basements to street
- little or no private rear space even on townhouses
- many 'front-loaded' garages on the street, alleys 30'
- extensive surface parking
- only two main intersecting streets, resulting in an isolated enclave lacking a sense of place or identity.



¹¹ <http://spires.cityoffrederick.com/sources/Planning/PC22-1160MU.pdf?fbclid=IwAR3q4KO1p2u83eroljkxRLiGeR6aTFGepGPDs8ajmQkZTaOij93X2QIwv5Q>

The outdated development style of building big boxes in a sea of parking and townhouses relegated to the edges of the master plan proposed by Greenberg Gibbons is incompatible with the East St Extension Plan 2001, East Frederick Rising 2010, Urban Land Institute 2013, East St Corridor Small Area Plan 2017, Comp Plan 2020, East Street Redesign 2022, Traditional Neighborhood Development in City LMC, and the East Frederick Vision Plan 2022.

- The developer disregards many years of local effort to think through how the eastside and the Brickworks should be developed as an extension of downtown
- The plan presents a standalone project poorly connected to downtown
- The large, single-use specialized buildings like a shopping mall are difficult to repurpose, hence vulnerable to market swings



expect and deserve.

The developer would much better satisfy the City, its residents, businesses, and East Frederick Rising's vision, long borne with significant investment in time, discussion and money, by submitting a master plan using the traditional neighborhood development (TND) school of city planning reflected in the many consensus planning documents, and with the Form Based Code soon to become City law. This current proposal fails to extend into East Frederick the features of a city widely regarded to be one of the best places to live in the country - which is what all stakeholders