

M-NCPPC



MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING

THE MARYLAND-NATIONAL CAPITAL
PARK AND PLANNING COMMISSION

8787 Georgia Avenue
Silver Spring, Maryland 20910-3760
301-495-4500, www.mncppc.org

MCPB
ITEM # 9
3/9/06



MEMORANDUM

DATE: February 24, 2005

TO: Montgomery County Planning Board

VIA: Rose Krasnow, Chief
Development Review Division *JK*

FROM: Catherine Conlon, Subdivision Supervisor (301-495-4542)
Development Review Division *CAC*

REVIEW TYPE: Preliminary Plan of Subdivision
APPLYING FOR: Preliminary Plan Approval for 26 dwelling units

PROJECT NAME: Woodside Courts
CASE NO. 120050610 (formerly 1-05061)
REVIEW BASIS: Chapter 50, the Subdivision Regulations and Chapter 59, the Zoning Ordinance

ZONE: RT-12.5
LOCATION: In the northwest and southwest quadrants of the intersection of Georgia Avenue (MD 97) and Noyes Drive
MASTER PLAN: North and West Silver Spring

APPLICANT: Noyes Lane, L.L.C.
ATTORNEY: Linowes and Blocher LLP
ENGINEER: Gutschick, Little & Weber, P.A.

FILING DATE: December 23, 2004
HEARING DATE: March 9, 2006

Staff Recommendation: Approval, including a waiver of Section 50-29(a)(2) pursuant to Section 50-38 to permit townhouses on individually recorded lots to front on private streets, and subject to the following conditions:

- 1) Approval under this preliminary plan is limited to 26 dwelling units.
- 2) Final approval of the number and location of buildings and dwelling units shall be determined at site plan.
- 3) Final approval of on-site parking, site circulation, sidewalks, and bikepaths will occur at site plan.
- 4) No clearing, grading or recording of plats prior to site plan signature set approval.
- 5) Compliance with the binding elements stipulated in Resolution No. 15-788 approved with the schematic development plan as part of the County Council approval of zoning case G-817.
- 6) The proposed development shall comply with all conditions of the final forest conservation plan. The applicant shall satisfy all conditions prior to recording of plat(s) or Montgomery County Department of Permitting Services (MCDPS) issuance of sediment and erosion control permits, as applicable. Approval includes compliance with all ISA certified arborist's recommendations and details in TPO (Tree Preservation) plans dated 10/20/2005.
- 7) Compliance with all exterior and interior noise mitigation recommendations and detailed building shell analysis as specified in report entitled "Traffic Noise Analysis – Woodside Courts" from Phoenix Noise and Vibration, LLC dated 2/24/2005.
 - a) Certification from an acoustical engineer that the building shell for residential dwelling units will be constructed to attenuate projected exterior noise levels to an interior level not to exceed 45 dBA Ldn. The certification shall be provided to MNCPPC Environmental Planning staff for concurrence prior to issuance of building permits.
 - b) Prior to issuance of building permits, the builder shall provide a signed commitment to construct the impacted units in accord with the acoustical design specifications required above. Any changes to the building shell construction that may affect acoustical performance must be approved in writing by an acoustical engineer with a copy to MNCPPC staff prior to implementation.
- 8) Compliance with the conditions of the MCDPS stormwater management approval dated July 6, 2005.
- 9) Applicant shall dedicate right-of-way along the Georgia Avenue (MD 97) and Noyes Drive frontages of the property to meet the full width mandated by the North and West Silver Spring Master Plan.
- 10) Applicant shall extend the center median on southbound Georgia Avenue (MD 97) toward Noyes Drive and provide a marked pedestrian crosswalk with pedestrian refuge as approved by Maryland State Highway Administration (SHA).
- 11) Applicant shall relocate the sidewalk along the Georgia Avenue (MD 97) frontage of the property to be set back from the road by a sufficient width green panel to be shown on the site plan.
- 12) On Noyes Drive between Georgia Avenue (MD 97) and the proposed private streets, applicant to widen the existing pavement to thirty-six (36) feet. East of the proposed private streets, the applicant shall taper the pavement width to twenty-six (26) feet.

Throughout the entire site frontage on both sides of Noyes Drive, the applicant shall construct curbs and gutters, planting strip with street trees, and four (4) foot wide concrete sidewalks.

- 13) Compliance with conditions of MCDPWT letter dated November 29, 2005, unless otherwise amended.
- 14) Record plat to reflect a Category II conservation easement to protect individual trees shown to be saved in Homeowners open space parcels and on proposed Lots 19 and 20.
- 15) Record plat to reference the Common Open Space Covenant recorded at Liber 28045 Folio 578 ("Covenant"). Applicant shall provide verification to Commission staff prior to release of final building permit that Applicant's recorded HOA Documents incorporate by reference the Covenant.
- 16) Record Plat to reflect all areas under Homeowners Association ownership and stormwater management areas.
- 17) Access and improvements as required to be approved by MCDPWT prior to recordation of plat(s).
- 18) Access and improvements as required to be approved by MDSHA prior to issuance of access permits.
- 19) The Adequate Public Facility (APF) review for the preliminary plan will remain valid for sixty-one (61) months from the date of mailing of the Planning Board opinion.
- 20) Other necessary easements.

SITE DESCRIPTION and SURROUNDING AREA:

The subject property consists of 2.68-acres located on the west side of Georgia Avenue (MD 97) on both the north and south sides of Noyes Drive in Silver Spring (see Attachment A). The property is zoned RT-12.5 per Local Plan Amendment G-817 adopted October 12, 2004. The property consists of several recorded parts of lots and contains five existing one-family detached dwelling units. Three of the existing houses were determined to be historically significant, and will be preserved as part of the proposed subdivision.

The site lies within the Sligo Creek watershed, classified as Use I. The site does not contain environmentally sensitive areas, but does include a small amount of forest and several specimen size individual trees.

PROJECT DESCRIPTION

The development yield for the subject property has been limited in accordance with the development plan approved by the County Council per zoning case G-817 in order to protect historically significant buildings and preserve specimen trees. This application proposes to create a residential community with 26 dwelling units, including 23 new market-rate townhouses, retention and renovation of 2 existing one-family detached historic dwellings, and relocation and renovation of 1 existing one-family detached historic dwelling (see Attachment B). The lot layout is consistent with the previously approved schematic development plan. Lot sizes for the detached houses are between 6,000 and 7,000 square feet, and from 1,250-2,760

square feet for the townhouses. Per the binding elements of the zoning approval, the preliminary plan reflects maximum lot coverage of 25% of the gross tract area and 60% of the gross tract as green area. The plan incorporates proposed protection measures to preserve several individual trees both on the site, and on adjacent lots along the property boundaries.

Safe and adequate access for vehicles and pedestrians will be provided by proposed private streets accessed from existing Noyes Drive. Site plan review pursuant to §59-D-3 is required for this project and is being done concurrently with this preliminary plan.

DISCUSSION OF ISSUES

Relationship to the North and West Silver Spring Master Plan

The Master Plan provides guidance for townhome development in this vicinity by suggesting that the location of townhouses be limited to the blocks along Georgia Avenue. Buildings should front on Georgia Avenue and the ends of buildings should have an appearance as fronts rather than blank facades. The Plan further suggests that the minimum front yard setback be 25 feet on Georgia Avenue. The Plan recommends that vehicular access be minimized on Georgia Avenue and that attractive streetscaping, along with sidewalks, be provided. Parking and garage access on the site should be oriented to the rear of buildings and sufficiently screened from adjoining properties. The proposed development complies with the Master Plan guidance for townhome development on Georgia Avenue.

Moderately Priced Dwelling Unit Waiver

Effective April 1, 2005, Chapter 25A of the Montgomery County Code dealing with Moderately Priced Housing was amended to require provision of MPDUs as part of development approvals containing 20 or more dwelling units. The applicant has requested a waiver of the MPDU requirement pursuant to Section 25A-6(b) of the Code. This section states:

“(b) *Waiver of requirements.* Any applicant who presents sufficient evidence to the Director of Permitting Services in applying for a building permit, or the Planning Board in submitting a preliminary plan of subdivision for approval or requesting approval of a site plan or other development plan, may be granted a waiver from part or all of Section 25A-5. The waiver must relate only to the number of MPDUs to be built, and may be granted only if the Director of Permitting Services or the Board, after consulting with the Department of Housing and Community Development Affairs, finds that the applicant cannot attain the full density of the zone because of any requirements of the zoning ordinance or the administration of other laws or regulations. When any part of the land that dwelling units cannot be built on for physical reasons is used to compute permitted density, the applicant’s inability to use the optional density bonus provisions is not in itself grounds for waiving the MPDU requirements. Any waiver must be strictly construed and limited.”

Applicant's Position

The Applicant believes (see Attachment C) that a waiver of MPDUs is justified in this instance because of the restrictions placed on this property as part of rezoning. These restrictions included limits on the overall density, more restrictive building coverage requirements, increased green area requirements, and the requirement to preserve existing historically significant dwellings on the property. In the Applicant's opinion, the fact that these restrictions make it impossible to achieve full density of the zone is grounds for the Board to waive the requirement for any MPDUs on the site.

Staff's Position

Per our interpretation of the Code requirements, Development Review Division staff does not think that failure to achieve full density is, in itself, grounds for a waiver of the requirement to provide MPDUs. Chapter 25A stipulates that a minimum 12.5% of the total units in a development with more than 20 units must be MPDUs, whether or not base density is achieved. Section 25A-6(b) states that a waiver must be based on a finding that the applicant cannot attain the full density of the zone because of *requirements of the zoning ordinance or the administration of other laws or regulations*. In staff's opinion, the restrictive binding elements contained in the rezoning approval for this property provide grounds for the requested waiver. The requirements for historic preservation, tree save, higher amounts of green area, and reduced lot coverage area all combine to significantly restrict the developer's ability to use the flexibility of the underlying zone to achieve a density which would make providing MPDUs economically feasible. The small size of this project increases the economic impact of market unit losses to provide MPDUs. For these reasons, staff recommends a waiver from the requirement to provide MPDUs for this project. Per the requirements of Section 25A-6(b), staff consulted with the Department of Housing and Community Affairs regarding the waiver and they also recommend the waiver.

Waiver of Lot Frontage on a Public Street

The proposed subdivision includes a combination of one-family detached and townhouse dwellings on individually recorded lots. The existing and relocated one-family detached dwellings in the proposed subdivision will have frontage on existing Noyes Drive, however, the proposed townhouses have frontage on private streets. Section 50-29(a)(2) of the Montgomery County Code, Subdivision Regulations states:

"Lots To Abut on Public Street. Except as otherwise provided in the zoning ordinance¹, every lot shall abut on a street or road which has been dedicated to public use or which has acquired the status of a public road. In exceptional circumstances, the board may approve not more than two (2) lots on a private driveway or private right-of-way; provided, that proper showing is made that such access is adequate to serve the lots for emergency vehicles, for installation of public utilities, is accessible for public services,

¹ For example, private road provisions are included in the RE-2, RE-2C, and RNC zones per Sections 59-C-1.34.1, 59-C-1.527, and 59-C-9.574(f); and for townhouses in certain residential zones when development includes moderately priced dwelling units per Section 59-C-1.628(b).

and is not detrimental to future subdivision of adjacent lands. In multi-family and townhouse development, not subdivided into individually recorded lots, the board may approve more than two (2) lots or buildings on private roads or drives, provided there is adequate access from such roads or drives to a public street, as above.”

The Planning Board has approved many subdivisions which include individually recorded townhouse lots on private streets, however, recent discussions between M-NCPPC and the Montgomery County Department of Permitting Services (DPS) have called into question whether such lots are permitted under the provision noted above. As a result of this discussion, DPS has taken the position that they will not approve record plats and building permits for lots fronting on a private street, unless the Planning Board’s approval includes a waiver of the provision. Although legal and development review staff have not reached the DPS conclusion that waivers are needed, we have analyzed the subject application under the waiver provisions to ensure that this project, if approved, will not be impacted by any future change in interpretation of Section 50-29(a)(2).

Section 50-38(a) authorizes the Planning Board to grant waivers of any part of the Subdivision Regulations based upon a finding that practical difficulties or unusual circumstances exist which prevent full compliance with the requirements. In staff’s opinion, a waiver to permit the proposed townhouse lots to have frontage on a private street is justified in this instance by the practical difficulties of constructing roads to public street standards given the restrictions placed on the development as part of the rezoning of the property. The design of this subdivision is based upon an approved schematic development plan crafted with binding elements which dictate certain design (i.e., maximum lot coverage of 25% instead of 35%, green area at 60% instead of 50%, and the requirement to preserve historic one-family detached dwellings in a townhouse zone) that can be accommodated only with a private street. Accommodating a public road requirement would reduce the amount of tree save, restrict the ability to preserve historic structures, and significantly impact site density, which has already been capped less than the underlying zone by the development plan.

For these reasons, staff recommends approval of a waiver to permit townhouse lots on private streets. The proposed streets meet fully meet fire access requirements and will provide adequate access from a public street and necessary parking.

Conformance with Section 50-29(b)(2)

A. Statutory Review Criteria

The subject application includes previously recorded parts of lots and is therefore, subject to resubdivision review. In order to approve an application for resubdivision, the Planning Board must find that each of the proposed lots complies with all seven of the resubdivision criteria, set forth in Section 50-29(b)(2) of the Subdivision Regulations, which states:

Resubdivision. Lots on a plat for the Resubdivision of any lot, tract or other parcel of land that is part of an existing subdivision previously recorded in a plat book shall be of the same character as to street frontage, alignment, size, shape, width, area and

suitability for residential use as other lots within the existing block, neighborhood or subdivision.

B. Neighborhood Delineation

In administering Section 50-29(b)(2) of the Subdivision Regulations, the Planning Board must determine the appropriate "neighborhood" for evaluating the application. In this instance, the Neighborhood selected by Staff and the applicant consists of 23 lots (Attachment D). The lots included in the neighborhood are within the adjacent townhouse subdivision to the north of the subject property on Georgia Avenue which shares the same zoning. In staff's opinion, the designated neighborhood provides an adequate sample of the lot and development pattern of the area covered by the RT-12.5 zone. A tabular summary of the area based on the resubdivision criteria is included in Attachment E.

C. Analysis

Comparison of the Character of Proposed Lots to Existing

In performing the analysis, Staff applied the above-noted resubdivision criteria to the delineated neighborhood. The proposed one-family detached dwelling lots were not included by staff in the analysis. These lots were required as part of the rezoning to protect historic resources, and are not comparable with the townhouse lots otherwise permitted in the zone. Staff considers the inclusion of these lots in the binding elements of the rezoning to be a de facto indication that they are in character for their location in the subdivision. It could be argued that resubdivision analysis for all the proposed lots is questionable because of the underlying RT-12.5 zoning. The RT-12.5 zone is a floating zone in which the individual zoning approvals, and schematic development plans, determine specific development requirements. Comparison of different plans could be likened to comparison of different zones, which is not Planning Board practice in applying the resubdivision provisions.

Although the subject application is required to meet specific historic preservation and green space requirements which did not apply to the existing townhouse community to the north of the site, staff determined that it was still appropriate to review at least the proposed townhouse lots per the resubdivision criteria. Based on analysis, staff concludes that the proposed are of the same character with respect to the resubdivision criteria as other lots within the defined neighborhood. Therefore, Staff concludes that the proposed resubdivision complies with the criteria of Section 50-29(b)(2). As set forth below, the attached tabular summary (Attachment E) and graphical documentation support this conclusion:

Frontage: In Staff's opinion, the proposed lots will be of the same character as existing lots in the neighborhood with respect to lot frontage.

The existing lots range in frontage from 20.67 feet to 37.38 feet. The proposed lots range in frontage from 20.67 to 40.61 feet. Most of the proposed townhouses fall within the range of frontages in the designated neighborhood, and those that do not are larger by no

more than 3 feet. In staff's opinion, the difference in frontages is not significant and does not result in lots that are uncharacteristic of the neighborhood.

Width: The proposed lots will be in character with existing lots in the neighborhood with respect to width.

The existing lots range in width from 20.67 feet to 37.38 feet. The proposed lots range in width from 20.67 to 40.61 feet. The proposed lots substantially fall within the range of widths in the designated neighborhood. In staff's opinion, the difference in widths, like frontages, is not significant and does not result in lots that are uncharacteristic of the neighborhood.

Alignment: The proposed lots will be in character with the existing lots with respect to the alignment criterion.

All the proposed lots are perpendicular in alignment, which is consistent with the existing lots in the designated neighborhood.

Size: The proposed lots will be in character with existing lots in the designated neighborhood with respect to size.

The existing lots range in size from 1,416 square feet to 2,712 square feet. The proposed lots range in size from 1,250 to 2,760 square feet. Seven of the proposed lots will be the smallest lots in the delineated neighborhood. However, the difference in size between the smallest proposed lots and the existing lots within the neighborhood ranges between 9 and 166 square feet. In staff's opinion, this is not a significant variation from the existing lot sizes.

Area: Staff finds the proposed lots to be of the same character as other lots in the neighborhood with respect to buildable area.

The buildable areas of lots in the designated neighborhood range from 1,075 square feet to 2,210 square feet. The proposed lots range in area between 992 square feet and 1,875 square feet. Eight of the proposed lots will have the smallest buildable area in the delineated neighborhood. The difference in areas between the smallest proposed lots and the existing lots in the neighborhood ranges between 42 and 183 square feet. In staff's opinion, this is not a significant variation from the existing lot areas.

Shape: The shapes of the proposed lots are in character with shapes of the existing lots.

The proposed lots are rectangular, which is consistent with the majority of lots within the designated neighborhood.

Suitability for Residential Use: The existing and the proposed lots are zoned residential and the land is suitable for residential use.

Transportation

Staff concludes that the subject preliminary plan will provide safe and adequate access for vehicles and pedestrians. The development is not anticipated to generate more than 30 peak-hour trips and is therefore, not subject to Local Area Transportation review. No significant impact to the adjacent transportation infrastructure is anticipated as a result of this development. To facilitate safe pedestrian access through and around this site, sidewalks will be improved and installed along property frontages, within the development and within the neighborhood. In addition, SHA has installed a crosswalk across Georgia Avenue at Noyes Drive and a pedestrian refuge will be created as part of this application in an extension of the Georgia Avenue median. Finally, this application will provide a crosswalk across Noyes Drive at Georgia Avenue, and improve the existing sidewalks along the Georgia Avenue frontage by providing a green strip between the sidewalk and roadway.

Environment

The Woodside Courts property contains 0.34 acres of forest and 22 individual trees which are 24 inches or more in diameter. The individual trees, including nine specimens (30" or greater in diameter) are located throughout and just off the site. The previous development plan approval focused on protection of certain specimen trees of community significance found at strategic locations around the site. The site layout has been designed to maximize the level of protection afforded to these special trees. There are no stream valleys or other environmentally sensitive areas on the property.

Forest Conservation/Tree Preservation

To achieve the proposed density on the subject property, all existing forest is being removed. To compensate for this forest removal, 0.75 acres of reforestation is required. The applicant has proposed payment of a "fee-in-lieu" of the required planting. Based on recently amended rates, the fee is \$0.90/square foot, or \$32,670, for this site. Alternatively, staff will accept offsite planting or use of available forest banks.

Trees on the subject property were evaluated by an ISA certified arborist for size, health, impact from development, and potential for save. The site design was adjusted where possible to preserve several trees determined to be of community significance. These trees include a 43" tulip poplar along Georgia Avenue, a 33" horse chestnut at the southwest corner of Noyes Drive and Georgia Avenue, and a 34" silver maple in front of the historic house south of Noyes Drive. In addition, potential impacts to several existing trees on adjoining lots were evaluated, and protection measures have been incorporated into the proposed plan to provide protection of these trees, where feasible.

Noise

The proposed residential units along the Georgia Avenue frontage of the development will be impacted by vehicle noise up to 72 dBA Ldn. The noise standard for exterior noise is 65

dBA Ldn. Both exterior and interior noise mitigation is needed to provide quieter backyard spaces and acceptable interior noise levels. Walls are proposed to attenuate noise in the rear yard spaces of the side-facing units on proposed Lots 26, 27 and 58. In order to achieve an acceptable interior noise level of 45 dBA Ldn for affected units (Lots 26, 27, and 53-58), acoustical treatments will have to be incorporated into the final design and construction of the buildings. These requirements are incorporated into Staff's recommended conditions of approval.

Citizen Issues and Concerns

Several letters (Attachment F) were received from the Woodside Civic Association and concerned neighbors during the review of this preliminary plan. Their initial concerns included: the originally submitted preliminary plan's non-conformance to the approved Schematic Development Plan; the proposed development's contribution to existing neighborhood stormwater runoff problems; and concerns about traffic control and pedestrian safety. Of particular concern with regard to traffic and pedestrians is the lack of speed control for vehicles traveling on Noyes Drive from Georgia Avenue to First and Second Avenues, and the overall lack of adequate sidewalks in the existing neighborhood. Subsequent letters reiterated these issues and raised additional concerns about the compatibility of the proposed units with the existing neighborhood given proposed unit size, massing and setbacks; and the need for incorporation of adequate tree protection measures and parking into the plan.

Subdivision staff requested revision of the preliminary plan to address the initial inconsistencies with the approved development plan. As discussed earlier, the proposed preliminary plan is now consistent with the requirements of the development plan. A stormwater management concept has been approved by the Montgomery County Department of Permitting Services (DPS) which includes a combination of underground retention pipes and dry wells into which stormwater runoff from the proposed impervious surfaces will be directed and controlled to ensure that it does not contribute to existing neighborhood problems. In addition, the Applicant has agreed to provide certain offsite improvements to the neighborhood storm drain system to improve the existing situation.

Traffic and pedestrian concerns were reviewed as part of the preliminary plan, and in more detail as part of the subsequently submitted site plan. Although M-NCPPC and Montgomery County Department of Public Works and Transportation (DPWT) staff did not support conversion of existing Noyes Drive into a cul-de-sac, as suggested in the submitted letters, other measures have been incorporated into the plan to improve the existing situation. These include requiring the Applicant to improve the existing cross-section and pavement of Noyes Drive and to install sidewalks. In addition, the Applicant has agreed to install additional offsite sidewalks within the neighborhood. Pedestrian circulation, compatibility and parking were reviewed in detail as part of the concurrently submitted site plan. The site plan requirements resulting from this review are covered in the site plan staff report.

CONCLUSION

Staff finds the size, width and orientation of the proposed lots are appropriate for their location in the proposed subdivision and that the overall plan complies with the requirements of Chapter 50, the Subdivision Regulations and Chapter 59, the Zoning Ordinance, as summarized in Table 1. Based on these findings, staff recommends approval of the proposed subdivision plan, including a waiver to permit townhouse lots on private streets, with the specified conditions.

Attachments:

- Attachment A – Site Vicinity Map
- Attachment B – Preliminary Plan
- Attachment C – MPDU Waiver Request
- Attachment D – Resubdivision Neighborhood
- Attachment E – Resubdivision Data Table
- Attachment F – Citizen Letters
- Attachment G – Agency Correspondence

Table 1. Preliminary Plan Data and Checklist

Plan Name: Woodside Courts				
Plan Number: 120050610 (formerly 1-05061)				
Zoning: RT-12.5				
# of Lots: 26				
# of Outlots: 0				
Dev. Type: Residential				
PLAN DATA	Zoning Ordinance Development Standard	Proposed for Approval on the Preliminary Plan	Verified	Date
Minimum Tract Area	20,000 s.f.	2.68 acres is minimum proposed	CAE	2/24/06
Lot Width	N/A	N/A		
Lot Frontage	N/A	N/A		
Setbacks				
Front	25 ft. Min.	Must meet minimum	CAE	2/24/06
Side	10ft. Min. from an adjoining RT-12.5 lot; 30ft. from any detached dwelling lot	Must meet minimum	CAE	2/24/06
Rear	20 ft. Min.	Must meet minimum	CAE	2/24/06
Height	35 ft. Max.	May not exceed maximum	CAE	2/24/06
Max Resid'l d.u. or Comm'l s.f. per Zoning	33 dwelling units	26 dwelling units	CAE	2/24/06
MPDUs	N/A			
TDRs	N/A			
Site Plan Req'd?	Yes	Being concurrently reviewed	CAE	2/24/06
FINDINGS				
SUBDIVISION				
Lot frontage on Public Street	Yes	Public and Private	CAE	2/24/06
Road dedication and frontage improvements	Dedication and construction of internal public roads	Yes	Agency letter	11/29/05
Environmental Guidelines	Yes	Yes	Staff memo	1/10/06
Forest Conservation	Yes	Yes	Staff memo	1/10/06
Master Plan Compliance	Yes	Yes	Staff memo	11/16/05
G-817 Binding Elements	25% lot coverage 60% green area	Yes	CAE	2/24/06
ADEQUATE PUBLIC FACILITIES				
Stormwater Management	Yes	Yes	Agency memo	7/6/05
Water and Sewer (WSSC)	Yes	Yes	Agency comment	1/31/05
10-yr Water and Sewer Plan Compliance	Yes	Yes	Agency memo	1/31/05
Well and Septic	N/A			
Local Area Traffic Review			Staff memo	11/23/05
Fire and Rescue	Yes	Yes	Agency memo	2/14/06
Historic Preservation	Yes	Yes	Staff memo	2/13/06

WOODSIDE COURTS (1-05061)



Map compiled on January 24, 2005 at 11:51 AM | Site located on base sheet no - 211NW03

NOTICE

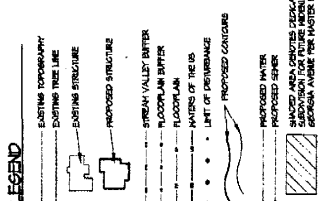
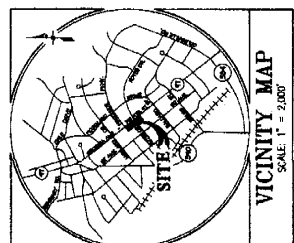
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Property lines are compiled by adjusting the property lines to topography created from aerial photography and should not be integrated as actual field surveys. Planimetric features were compiled from 1:14400 scale aerial photography using stereo photogrammetric methods.

This map is created from a variety of data sources, and may not reflect the most current conditions in any one location and may not be completely accurate or up to date. All map features are approximately within five feet of their true location. This map may not be the same as a map of the same area plotted at an earlier time as the data is continuously updated. Use of this map, other than for general planning purposes is not recommended. Copyright 1998

Key Map





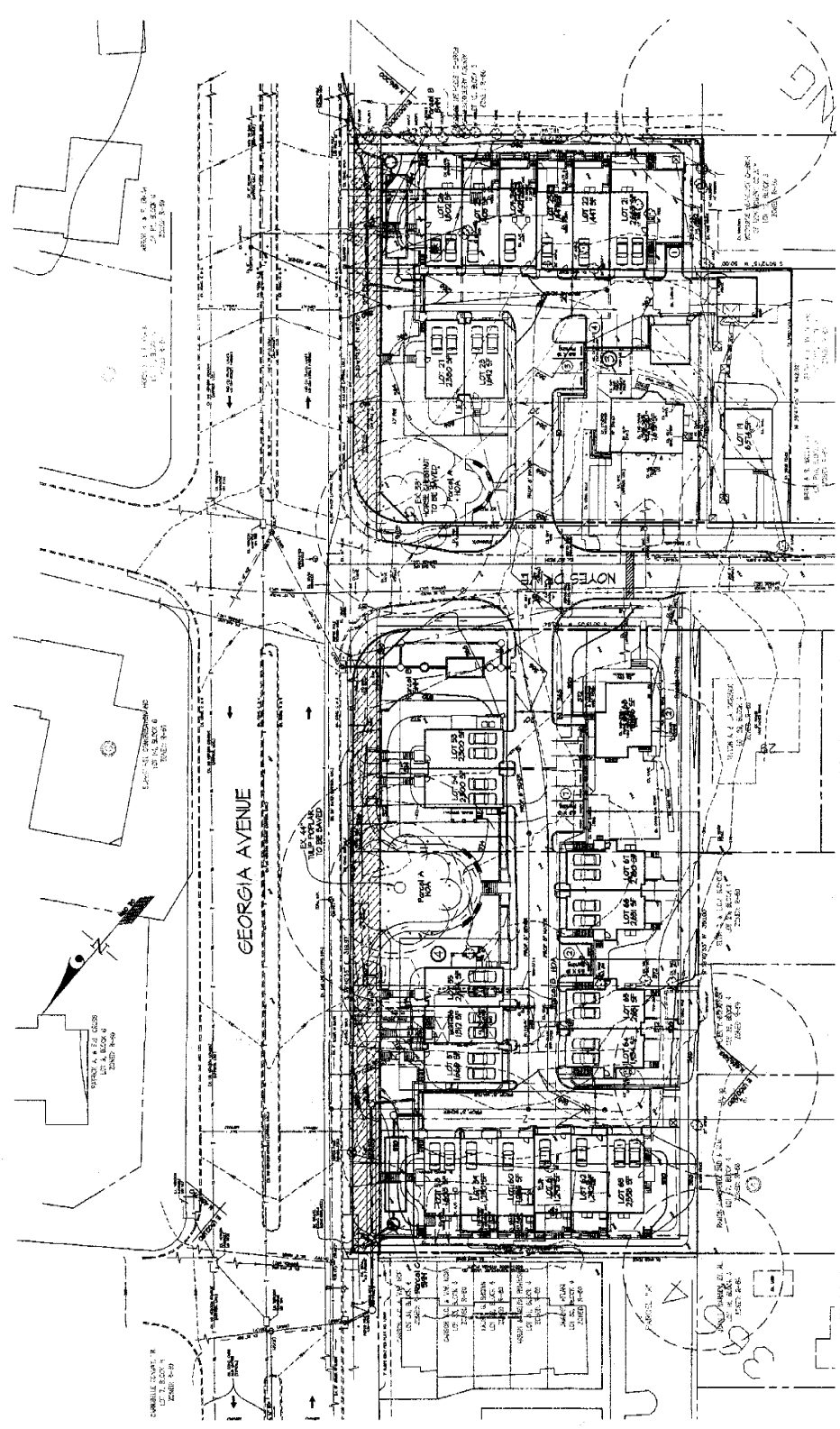
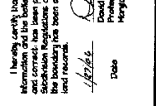
GENERAL NOTES

1. OWNER: NOTES LANE, LLC, 1750 OLD GEORGETOWN ROAD, SUITE 700, GEORGETOWN, MD 20884, TEL: 301-261-2200
2. ARCHITECT: J. P. WILSON ARCHITECTS, 200 9TH AVENUE, SUITE 100, WASHINGTON, DC 20004, TEL: 202-338-2000
3. ENGINEER: NOTES LANE, LLC, 1750 OLD GEORGETOWN ROAD, SUITE 700, GEORGETOWN, MD 20884, TEL: 301-261-2200
4. THE SITE IS LOCATED IN THE ALSO GREENS WATERSHED
5. THIS AREA IS NOT A SPECIAL PROTECTION AREA
6. FIELDS WATER AND SEWER TO BE FILLED IN
7. EXISTING WATER AND SEWER CONDUITS ARE 4" AND 6" APPROXIMATELY 17,200'
8. THIS PROPERTY WILL BE SUBJECT TO A FOREST CONSERVATION PLAN
9. DEVELOPMENT PROGRAM
10. THE PLAN WILL BE DEVELOPED IN A SINGLE PHASE
11. THE PLAN WILL BE DEVELOPED IN A SINGLE PHASE
12. THERE ARE NO KNOWN HAZARDOUS MATERIALS ON THIS PROPERTY
13. THERE ARE NO KNOWN HAZARDOUS MATERIALS ON THIS PROPERTY
14. THERE ARE NO KNOWN HAZARDOUS MATERIALS ON THIS PROPERTY
15. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC
16. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC
17. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC
18. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC
19. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC
20. LOCAL UTILITIES: WATER, SEWER, GAS, TELEPHONE, CABLE, AND FIBER OPTIC

ENGINEERS' CERTIFICATE

I, the undersigned, being duly qualified in the State of Maryland, do hereby certify that the above described project has been prepared in accordance with the provisions of the Maryland Professional Engineers and Land Surveyors Act, and that the same has been approved by the Board of Professional Engineers and Land Surveyors of the State of Maryland.

DATE: DEC. 20, 2014
 PROJECT NO. 14-004
 PROFESSIONAL ENGINEER: David L. Little, License No. 14004
 PROFESSIONAL LAND SURVEYOR: [Signature]



RECREATION CALCULATIONS

WORKING TYPE: 20 PK. Townhomes 4 Single Family Attached

Category	Children	Adoles	Adults	Seniors
20 PK. Townhomes	15	24	25	15
4 Single Family Attached	15	24	25	15
TOTAL	30	48	50	30

Supplies for Recreation Property:

Category	Children	Adoles	Adults	Seniors
20 PK. Townhomes	15	24	25	15
4 Single Family Attached	15	24	25	15
TOTAL	30	48	50	30

SITE DATA

See Area (Total Area): 248 A.

Parts of Lots 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

REDEVELOPMENT STANDARDS

Category	Standard
Tract Area	20,000 SF (6,460 A)
Density	20 DU / A
Lot Type	20 Townhome 4
Setback	15' Front, 10' Side, 10' Rear
Building Coverage	Max 30% of Tract Area
Building Height	20' Max
Building Orientation	10' Min
Setback from Adjacent Lots	10' Min
Setback from Street	10' Min
Front Setback	10' Min

PRELIMINARY PLAN
WOODSIDE COURTS
 Part of Lots 7, 8, 9, 10, & 11, BIL 3 & Part of Lots 1, 2, 3, & 4, BIL 4

PREPARED FOR:
 NOTES LANE, LLC
 7735 OLD GEORGETOWN ROAD, SUITE 700
 GEORGETOWN, MD 20884
 TEL: (301) 261-2200

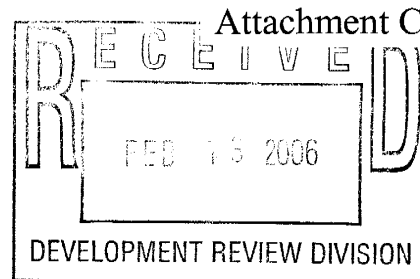
Category	Area	Volume
Tract Area	248 A	1,488,000 CU YD
Building Volume	10,000 CU YD	10,000 CU YD
Other Volume	10,000 CU YD	10,000 CU YD
TOTAL	258 A	1,508,000 CU YD

DATE: DEC. 20, 2014
 PROJECT NO. 14-004
 PROFESSIONAL ENGINEER: David L. Little, License No. 14004
 PROFESSIONAL LAND SURVEYOR: [Signature]

DATE: DEC. 20, 2014
 PROJECT NO. 14-004
 PROFESSIONAL ENGINEER: David L. Little, License No. 14004
 PROFESSIONAL LAND SURVEYOR: [Signature]

GLW GUTCHICK LITTLE & WEBER, P.A.
 CIVIL ENGINEERS, LAND SURVEYORS, LAND PLANNERS, LANDSCAPE ARCHITECTS
 300 ANNAPOLIS BLVD., SUITE 200, ANNAPOLIS, MD 21403
 TEL: 410-291-4000 FAX: 410-291-4001
 WWW.GLWGUTCHICKLITTLEWEBER.COM





February 12, 2006

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Via Email and Hand Delivered

Mr. Robert Kronenberg
Development Review
Maryland-National Capital Park and
Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re: Woodside courts, Site Pan No. 8-06003 (the "Site Plan")
MPDU Waiver request

Dear Mr. Kronenberg:

Per your request, we hereby submit this updated request for an MPDU waiver for this Site Plan, which is currently pending before the Montgomery County Planning Board for approval of 23 townhouse lots and 3 single-family dwelling lots on 2.68 acres of land (the "Property") located along the west side of Georgia Avenue, on either side of Noyes Drive in Silver Spring (the "Proposed Project"). The Property was reclassified to the RT-12.5 zone by the District Council on October 12, 2004 (the "Zoning Resolution") (attached hereto for reference as Exhibit "A"). Concurrent with the adoption of the Zoning Resolution, the District Council also approved a schematic development plan (the "SDP") pursuant to the provisions of Section 59-H-2.53 of the Montgomery County Zoning Ordinance. Numerous binding elements resulted from the Zoning Resolution and SDP (as a result of input from the surrounding community, M-NCPPC Staff, and the People's Counsel), including a density limitation of 23 townhouse units and 3 single-family homes, which density falls well short of the density yield permitted for the RT-12.5 zone under the Zoning Ordinance (33.5 dwelling units). The other binding elements of the Zoning Resolution and SDP (and recorded covenants on the Property) include a more restrictive building coverage requirement and an increased green area than ordinarily required in the RT-12.5 zone and the preservation of existing homes on the Property as approved by the Historic Preservation Commission ("HPC"). The Zoning Resolution specifically recognizes these binding elements (including in particular for purposes of this letter, density) were necessary to address environmental issues and compatibility, and that it was necessary to incorporate these limitations during the Site Plan process. Based on all of these restrictions and for the additional reasons described below, we submit that the Property must be exempted from the requirements to provide MPDUs pursuant to Chapter 25A of the Montgomery County Code.

Mr. Robert Kronenberg

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At the time of the rezoning, the Proposed Project was not required to provide MPDUs (as the minimum threshold for providing MPDUs was 35 dwelling units or more). Since the time of the Zoning Resolution, Chapter 25A has been amended to include projects of 20 units or more. Since the Applicant has no ability to exceed the density cap placed on the Property through the SDP binding elements and recorded covenants (which is again substantially less than that permitted in the zone- 33.5 units permitted/ 26 units allowed), the Applicant is totally without the ability to increase the density to provide MPDUs in accordance with the new requirements under Chapter 25A. Additionally, since the density cap established by the District Council through the Zoning Resolution and SDP was necessary to allow the requisite findings of compatibility, to address the environmental concerns to preserve an existing tree on the Property and to address the HPC recommendation to preserve the three existing homes and viewsheds, the density could not realistically be increased through an amendment to the SDP to accommodate MPDUs. (We note that the issue of compatibility was the most critical issue which was encountered throughout the zoning process and the local community is already on record as opposing any additional density to accommodate MPDUs.) Furthermore, it was never intended or envisioned that the density units permitted under the density cap would be anything other than market units, and all of the concessions, amenities, etc., supporting the Proposed Project and the Applicant's economic decision to purchase the Property, were absolutely based upon the return of 26 market units. Simply stated, now imposing 12.5% of the dwelling units (4 units) as MPDUs subject to the MPDU restrictions would render the Proposed Project economically infeasible. It would also run completely afoul of the underlying policies and intents (and legal basis) of the MPDU laws that the provision of MPDUs should not be an economic burden of the developer (see Chapter 25A, Section 2(6)).

Pursuant to Chapter 25A-6(b) of the County Code, the Planning Board may waive MPDUs to be built in a development if the Planning Board, in reviewing a subdivision or site plan for a property (and both apply in this case), finds that the applicant cannot attain the full density of the zoning because of any requirements of the zoning ordinance or the administration of other laws or regulations. In this particular instance, the Planning Board in reviewing the Site Plan (and the companion subdivision plan) for the Proposed Project will be bound by the same density cap put in place by the District Council through the SDP, that being 23 townhouses and 3 single-family houses for a total of 26 dwelling units. This not only precludes a density bonus but also falls far short of the allowable density permitted in the zone. Furthermore, with this hard cap on market units being the product of express findings by the District Council with respect to the compatibility of the Proposed Project with the neighborhood and its compliance with the environmental guidelines and historic preservation recommendations, the Proposed Project is further restricted in its ability to attain any additional density.

Therefore, the standards for the Planning Board's grant of an MPDU waiver as set forth in Section 25A-6(b) have been fulfilled and the approval of the waiver is the only equitable solution

Mr. Robert Kronenberg
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Page 3

to this unique set of circumstances. Accordingly, for the reasons described, we respectfully request that the Planning Board find, in its review of the Site Plan (and subdivision) for the Project, that no MPDUs shall be required for the Project pursuant to Chapter 25A-6(b). With this finding, we also respectfully request that the Director of Housing and Community Affairs (the "Director") subsequently execute an agreement specifying that no MPDUs shall be required for the Project. The Director has deferred the MPDU waiver request for the Proposed Project to the Planning Board pursuant to correspondence dated August 17, 2005 (attached as Exhibit "B"), and has thus provided the consultation referenced in Chapter 25A-6(b).

We believe that it is clear and unequivocal that these unique circumstances warrant the Planning Board approval of this MPDU waiver, and we urge Staff to support this request in their recommendation. Thank you for your consideration of our request. Should you require any additional information or if you have any questions, please do not hesitate to contact us.

Very truly yours,

LINOWES AND BLOCHER LLP

C. Robert Dalrymple

C. Robert Dalrymple

Anne C. Martin

Anne C. Martin

Attachments

cc: Ms. Elizabeth Davison
Ms. Rose Krasnow
Ms. Catherine Conlon
Tariq El-Baba, Esq.
Mr. Joseph Alfandre
Mr. George T. Myers
Mr. Stephen A. Mulholland
Mr. David Little
Mr. Kevin Foster

WOODSIDE COURTS Resubdivision Neighborhood



Map compiled on February 24, 2006 at 9:07 AM | Site located on base sheet no - 211FW02

NOTICE

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MONTGOMERY COUNTY DEPARTMENT OF PARK AND PLANNING
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
407 Georgia Avenue - River Spring, Maryland 20834-2703



RE-SUBDIVISION ANALYSIS

26-Aug-05

Rev. 1.12.06

WOODSIDE COURTS

Rev. 2.16.06

LOT #	BLOCK	SIZE	ALIGNMENT	FRONTAGE	SHAPE	WIDTH at BRL	BUILDABLE AREA	SUITABILITY
Existing Lots								
30	4	2,201	Perpendicular	31	Rectangular	31	2,201	SUITABLE
31	4	1,467	Perpendicular	20.67	Rectangular	20.67	1,467	SUITABLE
32	4	1,467	Perpendicular	20.67	Rectangular	20.67	1,467	SUITABLE
33	4	1,529	Perpendicular	21.52	Quadrilateral	20.67	1,529	SUITABLE
34	4	2,553	Perpendicular	32.9	Rectangular	32.9	2,104	SUITABLE
35	4	2,108	Perpendicular	31	Rectangular	29	2,056	SUITABLE
36	4	1,416	Perpendicular	20.67	Quadrilateral	20.67	1,416	SUITABLE
37	4	1,426	Perpendicular	20.67	Rectangular	20.67	1,344	SUITABLE
38	4	2,139	Perpendicular	31	Rectangular	31	2,015	SUITABLE
39	4	2,210	Perpendicular	26.36	Quadrilateral	26.36	2,210	SUITABLE
40	4	1,968	Perpendicular	28.34	Rectangular	21.34	1,478	SUITABLE
41	4	2,712	Perpendicular	37.38	Rectangular	30.38	2,200	SUITABLE
42	4	1,478	Perpendicular	20.67	Quadrilateral	20.67	1,478	SUITABLE
43	4	1,467	Perpendicular	20.67	Rectangular	20.67	1,467	SUITABLE
44	4	1,550	Perpendicular	20.67	Rectangular	20.67	1,550	SUITABLE
45	4	2,201	Perpendicular	31	Rectangular	29	2,059	SUITABLE
46	4	2,133	Perpendicular	31	Quadrilateral	23	1,893	SUITABLE
47	4	1,447	Perpendicular	20.67	Rectangular	20.67	1,447	SUITABLE
48	4	2,159	Perpendicular	31.25	Rectangular	31	2,159	SUITABLE
49	4	2,263	Perpendicular	31	Rectangular	31	1,612	SUITABLE
50	4	1,509	Perpendicular	20.67	Rectangular	20.67	1,075	SUITABLE
51	4	1,426	Perpendicular	20.67	Rectangular	20.67	1,116	SUITABLE
52	4	1,998	Perpendicular	21.13	Quadrilateral	26	1,456	SUITABLE
Proposed Lots								
19	3	6,574	Perpendicular	46	Rectangular	36	4,504	SUITABLE
20	3	6,673	Perpendicular	62.27	Rectangular	62.27	6,434	SUITABLE
21	3	2,663	Perpendicular	30.61	Rectangular	30.61	1,030	SUITABLE
22	3	1,447	Perpendicular	20.67	Rectangular	20.67	1,033	SUITABLE
23	3	1,447	Perpendicular	20.67	Rectangular	20.67	1,033	SUITABLE
24	3	1,405	Perpendicular	20.67	Rectangular	20.67	992	SUITABLE
25	3	1,405	Perpendicular	20.67	Rectangular	20.67	992	SUITABLE
26	3	1,802	Perpendicular	26.5	Rectangular	26.5	992	SUITABLE
27	3	2,308	Perpendicular	34.33	Rectangular	22.5	1,082	SUITABLE
28	3	1,692	Perpendicular	23.83	Rectangular	23.83	1,184	SUITABLE
53	4	2,300	Perpendicular	38.33	Rectangular	38.33	1,016	SUITABLE
54	4	2,300	Perpendicular	38.33	Rectangular	38.33	1,770	SUITABLE
55	4	2,434	Perpendicular	38.33	Rectangular	38.33	1,846	SUITABLE
56	4	1,312	Perpendicular	20.67	Rectangular	20.67	995	SUITABLE
57	4	1,660	Perpendicular	26.13	Rectangular	26.13	1,259	SUITABLE
58	4	1,603	Perpendicular	26.5	Rectangular	20.67	1,106	SUITABLE
59	4	1,250	Perpendicular	20.67	Rectangular	20.67	1,106	SUITABLE
60	4	1,250	Perpendicular	20.67	Rectangular	20.67	1,106	SUITABLE
61	4	1,292	Perpendicular	20.67	Rectangular	20.67	1,148	SUITABLE
62	4	1,292	Perpendicular	20.67	Rectangular	20.67	1,148	SUITABLE
63	4	2,538	Perpendicular	40.61	Rectangular	40.61	1,144	SUITABLE
64	4	1,934	Perpendicular	28.33	Rectangular	28.33	1,368	SUITABLE
65	4	2,651	Perpendicular	38.83	Rectangular	28.83	1,875	SUITABLE
66	4	2,651	Perpendicular	38.83	Rectangular	28.83	1,875	SUITABLE
67	4	2,760	Perpendicular	27.33	Rectangular	27.33	1,872	SUITABLE
68	4	6,456	Perpendicular	63.11	Rectangular	53.11	4,811	SUITABLE

ATTACHMENT F