November 14, 2017

To: Elza Hisel-McCoy
elza.hisel-mccoy@montgomeryplanning.org

Re: Westbard Self Storage Facility, Preliminary and Site Plans
Site Plan No. 820170110

Dear Mr. Hisel-McCoy and Planning Staff,

The Little Falls Watershed Alliance (LFWA) is an environmental stewardship group for the Little Falls watershed. We have over 2,000 members, and since our founding in 2008 have worked with thousands of volunteers addressing environmental issues in the watershed. Our mission is to protect the fragile natural environment in lower Montgomery County and adjacent DC neighborhoods and to ensure that the natural spaces in our area persist for generations to come.

We have been very concerned with the design and construction of the Westbard Self Storage Facility, as it not only is in our watershed, but it is the first building to be redeveloped that abuts the proposed Willett Branch Park. The restoration of the Willett Branch and formation of the new greenway park is the central amenity of the Westbard Sector plan. It is a tremendous vision for the area. When it is realized, it will be a centerpiece for the Montgomery Parks system and a huge benefit not only to the residents of the area, but to the whole county. With its location off the very popular Capital Crescent Trail, hundreds of people will use it to enjoy the stream and the beauty of the natural area. It will provide the only meaningful green space for the sector. Because the Westbard Self Storage facility is located in the heart of the proposed park, careful attention must be paid to how the parcel is developed to ensure the success of the park.

We have had frequent meetings with the planning staff on the plans for the Westbard Self Storage site and are very pleased that the building has been moved out of the stream buffer. We are also pleased to see the dedication of parcel 177. This parcel, on the banks of the Willett Branch, is the first dedication for the new park!

However, we still have the following concerns:

- **Stormwater Management Concept Must Include Infiltration Techniques:**

  The storage facility abuts the Willett Branch. At this time, the stream is totally contained in a trapezoidal concrete channel. However, the Sector Plan calls for naturalizing the stream and connecting it with the ground water as part of the formation of the Willett Branch Park. This makes recharging the ground water in this area of paramount importance.
The Westbard Storage Facility Stormwater Management Concept depends entirely on green roof and other non-infiltration techniques. While a green roof does provide heating and cooling benefits, from a water quality perspective, a green roof is not satisfactory as it does not provide groundwater recharge. Without infiltration, the site will not function as "woods in good condition", a goal of the County’s stormwater management plan. The Maryland Stormwater Management Act of 2007 mandates that stormwater standards must be applied to best mimic pre-developed conditions. Infiltration is critical to achieving this goal.

The developer has stated that the constraints of the property and soil type have made it impossible to implement in-ground Environmental Site Design. LFWA engaged Diane Cameron, GreenGrowth LLC, to review the stormwater plan, and she has identified several areas where the developer can employ techniques that will allow the rain water to soak into the ground, including using pervious pavement, infiltration buffers and dry wells. Ms. Cameron also suggests that the developer consider soil augmentation and infiltration trench/basins. We have attached her review of the plans. We request that the developer be required to revisit the SMC and seriously explore her suggestions before submitting the final stormwater management plan for approval.

We are further concerned that the engineering study and recommendations for the site are based on a building that has a 10-foot cellar, not 40 feet of underground area. There needs to be more clarity on this from the applicant. Can their geotechnical study be adequate if it is based on the assumption of only one lower level, not three or four?

- **The Building is Too Big for the Site:**
  We believe a fundamental problem with the plan is that the proposed building is too large for the site. The developer is constructing a building with almost double the usable space permitted by the FAR by going many levels below ground. While this additional cellar space may not be considered part of the FAR as it is traditionally deemed “unsalable,” in the case of a storage facility, it is, in fact, very usable space. With the usable space extending so far beyond the zoning code’s contemplation, we feel that the building footprint should be further reduced in order to allow for allow for infiltration of environmental site design stormwater treatment that is so necessary for the health of the new Willett Branch Park as discussed above. Reducing the footprint will also allow more amenity open space on the parcel and greater setbacks to avoid shadow on the park areas, as well as a wider path into the park from River Road.

- **Access to Park is Not Welcoming:**
  The proposed 18 or 20-foot pathway to the park is too small to be more than a narrow driveway. With the 70-foot wall on one side and a 20-foot retaining wall on the other, visitors will not be welcomed into the park, but rather have to pass through a dark alleyway to get there. We think at least a 24-foot path would be more appropriate. Further, stepping back the building would allow for more light in this area. The entrance to the park should comply with p. 51 of the Sector Plan, which calls for “safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road.”

- **Interface with Park at Rear of Property is Unattractive:**
  One of the concerns that has been raised continually throughout the redevelopment process is the need for an attractive interface with the park: buildings should embrace the park rather than turn their backs to it. We understand this to be a challenge with a self-storage facility, but this building makes no effort to embrace the park with anything but a 70-foot wall.
rear of the building is especially unattractive, and given the great height, will cast a shadow over the new park. We would like to see the rear of the building stepped back with green roofs on each level and liberal use of green screens. It would make a beautiful transition to the park and a very attractive self-storage facility.

Landscaping for the rear seems to be limited to grass. We hope that the developer will work with Parks and the Department of Environmental Protection to install native plantings appropriate to the building’s stream-side location.

The Westbard Self Storage facility will be adjacent to the heart of the new Willett Branch Park. How the stormwater is managed, how the buffer is treated, how the landscaping is done, and how the park is accessed will all have a huge impact on the success of the new park and restoration of the Willett Branch. The new park promises to be a national showcase for environmental improvement, and Montgomery County will have a lot to be proud of when it is completed. We have this chance to leave a legacy for our children. Please take the time now to be sure it is done right.

Thank you to your attention to these details,

Sarah Morse  
Executive Director  
Little Falls Watershed Alliance

cc: Gwen Wright, Montgomery Planning  
    Robert Kronenberg, Montgomery Planning  
    Marco Fuster, Montgomery Planning  
    David Kuykendall, Department of Permitting Services  
    Mark Etheridge, Department of Permitting Services  
    Roger Berliner, Montgomery County Council  
    Mike Riley, Montgomery Parks  
    Brooke Farquhar, Montgomery Parks  
    Susanne Paul, Montgomery Parks  
    Andy Frank, Montgomery Parks
Memo

From: Diane Cameron, GreenGrowth LLC

To: Sarah Morse, Little Falls Watershed Alliance

Date: Monday, November 13, 2017

Re: Stormwater-related comments - proposed Westbard Self Storage Facility, 5204 River Road, Bethesda Maryland.

Comments below are organized as follows:

1. Willett Branch restoration is part of the Westbard Sector Plan.

2. LFWA has engaged a consultant to provide review and comment on a site-specific Westbard redevelopment project’s proposed stormwater plan.

3. Site description and proposed SWM plan.

4. Brief critique of the proposed SWM Plan

5. Potential role of infiltration at this site and some caveats and pre-requisite information.

6. Conclusions

1. The 2016 Westbard Sector Plan includes a vision for a revitalized Willett Branch. This stream, a tributary of Little Falls, is now a trapezoidal concrete channel that intersects the Capital Crescent Trail and winds its way through high-rise apartments and a myriad of small-scale industrial and utility buildings. The Willett Branch restoration plan “envisions a new urban greenway with a program of elements and activities that promotes the ecological and environmental benefits of a naturalized stream.”¹ To promote the creation of this new urban greenway, it’s essential that the redevelopment of each parcel within the Willett Branch watershed include a stormwater management plan that contributes to this naturalized stream. Fulfillment of this vision requires use of stormwater practices that will capture, reduce, and cleanse runoff, and then feed it back to Willett Branch via a steady non-erosive flow of water including during dry weather.

The stormwater management plans for site-specific projects in these watersheds need to be consistent with, and contribute to the implementation of these watershed and stream restoration plans, including those implemented by Montgomery County Department of Environmental Protection in compliance with the County’s MS4 Phase I NPDES permit.

¹ Montgomery County Planning Department, Frequently Asked Questions about Equity One’s Westbard Development Application, website accessed 11/13/2017
http://montgomeryplanning.org/planning/communities/area-1/planwestbard/
2. Little Falls Watershed Alliance is a 501(c)3 organization that has engaged stormwater consultant Diane Cameron (GreenGrowth LLC), to review the proposed stormwater management plan for a redevelopment project called Westbard Self Storage. In reviewing the stormwater management plan, LFWA requested that the consultant focus on the potential role for infiltration strategies and practices. Diane Cameron has degrees in Geology and Environmental Engineering, the latter from the University of Maryland. Her expertise is in the realm of stormwater regulation and watershed protection at all levels of government, with a specialty in green infrastructure – Environmental Site Design strategies.

3. Site Description and Proposed project and stormwater management plan description

Westbard Self Storage has applied to build a 1.37-acre facility at 5204 River Road in Bethesda Maryland; this is the southwest corner of River Road and the Capitol Crescent Trail. The proposed storage facility would have a total of 23,500 square feet. The submitted architectural drawings available on the Montgomery County Planning Department website indicate a total of three below-grade levels and five levels above-grade.2

The site is located adjacent to the Willett Branch stream and its stream valley buffer. Willett Branch is currently a concrete trapezoidal channel, with steep slopes above it overrun with invasive plants. During a visit to the site on 11/13/2017, there was water running in the Willett Branch channel during dry weather, but since this was within 12 hours of a moderate overnight storm, it is reasonable to expect that Willett Branch has little baseflow on dry-weather days that are more than 48 hours after a rainstorm. Thus, providing groundwater-fed baseflow to Willett Branch, including through stormwater plans for redevelopment projects bordering the stream, is a positive goal in support of the Westbard Sector Plan’s vision of a restored Willett Branch.

According to this project’s proposed Stormwater Management Plan, authored by Bohler Engineering,

The site consists of an existing radio tower and car repair shops. This project proposes to redevelop the site to incorporate a new self-storage building, asphalt trail and parking area.3

Bohler Engineering and Wetlands Studies and Solutions have submitted documents to Montgomery County Department of Permitting Services on behalf of the applicant. The applicant is proposing to raze the existing car repair business and build a 0.9-acre storage facility. Proposed stormwater plan consists of an 8” green roof and two micro-bioretention units.

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2 See for example, the final Submitted Architectural Drawing (10/13/2017), depicting 3 below-ground levels (not counting the first floor which is partly below-ground). At: https://plans.montgomeryplanning.org/PdocTemp/09-ARCH-820170110-010.pdf

4. Brief critique of the proposed SWM Plan

The project with its micro-bioretention planter boxes and approximately 12,345 square feet of an 8" thick green roof to treat stormwater runoff, is overall a strong plan to meet and slightly exceed volume requirements. These are positive elements that LFWA can support. The question is, is this approach adequate to enable the proposed project to contribute to the restoration of the adjacent Willett Branch? The preliminary answer is that while its thick green roof would indeed contribute to stormwater treatment, it would not contribute groundwater infiltration that could replenish the stream’s base flow during dry weather. Further study and consideration of the potential for infiltration is recommended.

The stormwater management plan for this project rules out infiltration techniques based on presence of urban fill HSG “D” Soils. The Geotechnical report provides data on the textural composition of soil and subsoil from five borings; it indicates the presence of a wide range of textural types including sandy lean clay, silt, and weathered bedrock, all of which may permit some infiltration.

In my opinion, further study should be done on the existing soils and subsoils on the site, including a soil chemical analysis for legacy contaminants. In addition, the potential for soil restoration techniques to restore permeability should be explored. Depending upon further information and analysis, it’s possible that this site would permit a carefully-designed infiltration system, and such system would benefit Willett Branch and its adjacent Stream Buffer by providing groundwater-fed baseflow. In addition, the information from this further study would contribute to a refinement of the Willett Branch restoration plan approach for other redevelopment sites in the Willett Branch watershed.

The table below provides a comparison of the stormwater techniques considered for this project with a focus on techniques that contribute to infiltration.
<table>
<thead>
<tr>
<th>Proposed Practice</th>
<th>Project Applicant Statement</th>
<th>Comments on Selected Practices</th>
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</thead>
<tbody>
<tr>
<td>two (2) micro-bioretention planter boxes</td>
<td></td>
<td></td>
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<tr>
<td>12,345 SF of green roof</td>
<td></td>
<td></td>
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<tr>
<td>Practices Considered but Ruled Out by Applicant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) Rainwater Harvesting (M-1)</td>
<td>This practice is not suitable for this project because of the urban nature of the site, spatial constraints and the presence of the Stream Valley Buffer. Other practices were selected instead.</td>
<td></td>
</tr>
<tr>
<td>(b) Submerged Gravel Wetlands (M-2)</td>
<td>Due to the site layout, this practice is not feasible for spatial constraints. Other practices were selected instead.</td>
<td></td>
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<tr>
<td>(c) Landscape Infiltration (M-3)</td>
<td>This practice is not suitable for this project because this project has type “D” soils. Other practices were selected instead.</td>
<td></td>
</tr>
<tr>
<td>(d) Infiltration Berms (M-4)</td>
<td>This practice is not suitable for this project. This practice is not suitable for this project because this project has type “D” soils. Other practices were selected instead.</td>
<td>The MDE Manual Chapter 5 does not list “Type D soils” as a Constraint for this practice. Because the site of this project is adjacent to the Willett Branch stream channel and riparian area, Infiltration Berms should be seriously considered.</td>
</tr>
<tr>
<td>(e) Dry Wells (M-5)</td>
<td>This practice is not suitable for this project because of the urban nature of the site, spatial constraints and the presence of the Stream Valley Buffer. Other practices were selected instead.</td>
<td>Investigate further whether dry wells could be viable at this site.</td>
</tr>
<tr>
<td>Practice</td>
<td>Description</td>
<td></td>
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<tr>
<td>(f) Rain Gardens (M-7) -</td>
<td>This practice is not suitable for this project because of the urban nature of the site, spatial constraints and the presence of the Stream Valley Buffer. Other practices were selected instead.</td>
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<tr>
<td>(g) Swales (M-8) -</td>
<td>Due to the site layout, this practice is not feasible for spatial constraints. Other practices were selected instead.</td>
<td></td>
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<tr>
<td>(b) Permeable pavements (A-2) -</td>
<td>This practice is not suitable for this project because this project has type “D” soils. Other practices were selected instead. “D” soils can be restored using a variety of techniques. With this approach, permeable pavements can become a more-viable option worthy of a second look.</td>
<td></td>
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<tr>
<td>(2) Nonstructural Practices (Disconnection of Rooftop (N-1) and Non-Rooftop (N-2) Runoff or Sheetflow to Conservation Areas (N-3)).</td>
<td>- Due to the site layout, this practice is not feasible for spatial constraints.</td>
<td></td>
</tr>
</tbody>
</table>

Additional Practices

The following practices were not evaluated for this site but are worthy of consideration:

<table>
<thead>
<tr>
<th>Practice</th>
<th>Not considered</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil Restoration/ Soil Compost Amendment</td>
<td></td>
<td>Virginia DEQ includes this practice as a technique for restoring HSG “D” soils. Is not recommended for slopes greater than 10%, so this could be used in conjunction with other techniques at the top of the site adjacent to but not on the slope to Willett Branch.</td>
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<tr>
<td>Infiltration Trench/ Basin</td>
<td></td>
<td>MDE Manual Chapter 3 on Infiltration Practices – setbacks of 25 feet required for facilities downgradient of structures; not able to be sited on slopes of greater than 10%. so this could be used in conjunction with other techniques on the site, adjacent to but not on the slope to Willett Branch.</td>
</tr>
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</table>

4 VA DEQ STORMWATER DESIGN SPECIFICATION NO. 4 SOIL COMPOST AMENDMENT (2011).
5. Potential role of infiltration at this site and some caveats and pre-requisites.

This site presents the possibility of infiltration as a stormwater treatment train step, after the runoff is treated by the green roof and micro-bioretenion boxes. Depending upon the results of further study, infiltration could be a viable option through one or more techniques, including those that were considered but ruled out by the applicant, and potentially other practices, such as soil restoration, that were not yet considered.

Pre-requisites to use of infiltration at industrial redevelopment sites include soil testing for toxic chemicals; the existing geotechnical report focused on soil and groundwater conditions and textural characterization for the purpose of supporting the proposed construction project; it did not report on any soil or groundwater chemistry tests for contaminants that may be present due to present or past activities on this site. Appropriate site characterization that rules out the presence of legacy contaminants, is a pre-requisite to selection of infiltration practices at an urban redevelopment site.

Caveats about urban fill soils and infiltration warrant caution.

Infiltration at industrial sites and “D” fill soils is often ruled out in an abundance of designer caution. For instance, one guidance document states, “Sites that have been previously graded or disturbed do not retain their original soil permeability due to compaction. Therefore, such sites are not good candidates for infiltration practices. In addition, infiltration practices should never be situated above fill soils.” In addition to the “D Soil compaction” concern, the other major concern for urban project managers contemplating use of infiltration is the potential it poses for mobilizing legacy contaminants. In conjunction with the applicant’s proposed 8” green roof and microbioretention units, this runoff would be well-treated before being infiltrated. Finally, the potential for migration of infiltrated water to impact the underground level of the proposed storage facility, while not obvious from looking at the site’s slope downward toward Willett Branch, is still possible and should be ruled out through careful analysis. Although all three of these issues — toxics; compaction; and groundwater migration are significant enough at any urban redevelopment site, and especially industrial sites, to warrant further in-depth investigation, the benefits of infiltration warrant further study, not categorical elimination. (An example of an urban stormwater infiltration guidance presentation is available at [http://chesapeakestormwater.net/wp-content/uploads/downloads/2012/06/Ultraurban-Stormwater-Design.pdf](http://chesapeakestormwater.net/wp-content/uploads/downloads/2012/06/Ultraurban-Stormwater-Design.pdf).)

6. Conclusions

Overall, the proposed stormwater management plan for this project, and in particular the proposed 8” green roof would provide 1.81 inches of stormwater capture and treatment, is quite good for a dense redevelopment site. On the other hand, extending this project’s stormwater treatment train to include

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5 ECS (September, 2016) report of Subsurface Exploration and Geotechnical Engineering Analysis; ECS Project No.:1:25160. 5204 River Road Bethesda, Maryland for 1784 Capital Holdings.
infiltration, is worthy of deeper consideration on the part of the applicant, county plan reviewers, and citizen watershed stakeholders.

Although conventional stormwater practice for the past thirty years has tended to avoid infiltration approaches in dense urban areas, this view is starting to change as urban watershed restoration matures and new techniques have been used that enable infiltration to be part of the urban stormwater toolbox. Equally important, this project’s location on the banks of Willett Branch makes it potentially able to provide infiltration and thus to replenish the stream’s base flow during dry weather.

The specific infiltration techniques of infiltration berms, along with infiltration trenches and permeable pavement, should be further studied in-depth by the project applicant’s engineers and reviewed carefully by County officials. For techniques that further study deems viable at this site, the County should work with the applicant to provide incentives to enable the extension of the stormwater treatment train, to provide infiltration in order to support the Willett Branch restoration.

Given that the public interest is served in restoring Willett Branch – a centerpiece of the Westbard Sector Plan – it’s in the public interest for Montgomery County agencies and other stakeholders to work with the applicant to a) seriously re-consider, at a greater depth of analysis, the possibility of adding stormwater infiltration practices to this site’s treatment train; and b) to evaluate a full range of options for providing incentives and assistance to the applicant to support installation of this fuller treatment train.
As Mayor of the Village of Drummond, a community located within the Little Falls Watershed, I'm writing to inform you that the Drummond Citizens Committee, our governing body, has voted to associate our community with, and endorse, the views on the proposed Westbard Self Storage Facility set forth in the letter dated November 14, 2017, from the Little Falls Watershed Alliance to Mr. Elza Hisel-McCoy and Planning Staff.

Very truly yours,

Daniel B. Silver
Mayor, Village of Drummond
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Daniel Silver
301-986-1926
(summer) 802-563-2528
Citizens Coordinating Committee on Friendship Heights

November 17, 2017

Robert Kronenberg
Elza Hisel-McCoy
Marco Fuster
Rachel Newhouse
Andy Frank
Susanne Paul

Re: Westbard Self Storage – Citizens Coordinating Committee on Friendship Heights Concerns – Preliminary Plan No. 120170280 and Site Plan No. 820170110

Reviewing the status of the plans for Westbard Self Storage we wish to express our appreciation to the staff for their work that resulted in the developer removing the intrusion of the building into the stream valley buffer.

As noted previously, our overall concern is to enhance the quality of life for the residents in the immediate vicinity. We have in this instance a juxtaposition of high-rise residential with an aging industrial park separated by the Willett Branch creek. The Willett Branch Greenway will be a significant asset to the residents providing the green space, parkland, and water essential to a positive human experience. Nothing else of such character is available to them in the vicinity.

Matters of further concern to us are:

**Western wall of storage building**: A year ago, there were some assumptions that the lower parking lot on the other side of the Willett Branch from the HOC building would be dedicated to the Willett Branch Greenway. That cannot be assumed as Regency Centers and HOC have not committed to it. Instead, in relevant part, it must be assumed that the Willett Branch Greenway will be located between the eastern boundary of that lower parking lot and the proposed Westbard Self Storage Building. We believe that given the location of the western wall of the storage building, as proposed, the Greenway will be too narrow, functionally and aesthetically, and that this deficiency will be exacerbated by the very high western wall of the proposed storage building. Another consequence of this cramped space would be to limit rerouting of the Willett Branch to slow down rapid flows in substantial precipitation events.

**Access**: The pedestrian access from River Road to the Willett Branch Greenway has the character of a long alley. The developer has endeavored to improve the appearance of the building wall fronting that alley. However, a narrow alley pedestrian pathway with a high building wall on the south side and the McDonald’s substantial retaining wall on the north side is intimidating, not inviting. Cannot building design accommodate step backs with each story in height? Especially given the considerable underground rentable space?
We also have questions to pose for your further consideration with respect to not only Westbard Self Storage, but future projects.

* * * * *

**Storm water:** The green roof is good, but shouldn't various infiltration techniques be employed in order to comply with Maryland and Montgomery County policies and objectives?

**Cellar:** When a cellar becomes multilevel rental space utilized in the same manner as above ground space shouldn't such space become subject to FAR constraints? If such conditions of usage exist shouldn't the required parking ratio apply to the total rentable space? i.e., above ground plus below ground?

* * * * *

We appreciate your consideration of the above and we look forward to the staff report for the Planning Board hearing.

Respectfully submitted,

Harold Pfohl
Chair
Citizens Coordinating Committee
On Friendship Heights
Westmoreland Citizens Association
November 17, 2017

To: Elza Hisel-McCoy
   elza.hisel.mccoy@montgomeryplanning.org

Re: Westbard Self Storage Facility, Preliminary & Site Plans
Site Plan No. 820170110

Dear Mr. Hisel-McCoy and Planning Staff,

The Westmoreland Citizens Association (WCA) represents 1000 households in Bethesda between Westmoreland Circle and Little Falls Parkway, and from Western Avenue to Little Falls Park, so straddling Massachusetts Avenue. WCA is near the Westbard Sector, and our shopping habits contribute to the success or failure of the businesses there. The WCA’s support of tens of thousands of dollars to Citizens Westbard and the Moses Cemetery, individually and collectively, indicates our strong desire for a plan with a community feel to it.

The WCA supports the Little Falls Watershed Alliance’s (LFWA) letter to you: we are relieved that the self storage unit has been moved out of the stream buffer, and parcel 177 may be part of a Park. These are positive steps forward, but we remain concerned regarding other items.

WCA residents understand what tall buildings surrounding a roadway do to the aesthetics of the community; even more so for tall buildings surrounding a Park. We understand that a 70 foot wall on one side and a 20 foot retaining wall on the other side with a 20 foot path in between will resemble an uninviting gauntlet. How will you make this Park welcoming without requiring the reduction of the 70 foot wall, and widening the path? If people won’t enter the Park, it will be no great amenity. It could actually end up being a blight which will need to be policed.

The WCA doesn’t claim expertise on infiltration, but we do understand that water run-off from the property needs to soak into the ground to avoid erosion and pollution of the creek, and should follow best practices. We are also concerned that the storage unit has doubled its FAR allowance by building underground, exceeding traditional definitions of “cellar”, even exceeding the above ground footprint. What about commensurate parking obligations? If you do not make an example of this, then further abuses will continue throughout the sector development.

WCA residents consider the Park and Creek as the best and only true amenities in the Westbard Sector Plan. If you will embrace best practices, and create a 3-D rendering, study it, share it with the public, and invite public comment by placing it on your website, you will truly serve your public, and perhaps argue more effectively to represent them. Visuals are compelling; a picture is worth a thousand words.

Thank you for considering our suggestions.

Respectfully submitted,

Celia Martin
WCA President (elected)

cc: Gwen Wright, Montgomery Planning
    Robert Kronenberg, Montgomery Planning
    Marco Fuster, Montgomery Planning
    David Kuykendall, Department of Permitting Services
    Mark Etheridge, Department of Permitting Services
    Roger Berliner, Montgomery County Council
    Mike Riley, Montgomery Parks
    Brooke Farquhar, Montgomery Parks
    Susanne Paul, Montgomery Parks
    Andy Frank, Montgomery Parks
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

I have lived on Goldsboro Rd and here for decades. The existing Security Storage building shouts indifference to the neighborhood. Clearly any taller building would be outrageous. Where are the voices from Kenwood regarding property values?

Regards,

Louise Alport
5914 Onondaga Rd.
Bethesda, MD. 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans will not enhance the reverence due the Moses African Cemetery. 5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns. Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community. Regards,

Cindy Amrine
5621 Ogden Road
Bethesda, MD 20816

Home: 301.229.2587
Cell: 202.409.4499
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,

Sherry Bachman
5332 Falmouth Rd
Bethesda, MD 20816
Mr. McCoy,

Reference is made to comments submitted this morning by Susan Spock concerning the proposed Westbard Self Storage facility, a copy of which is included in the forwarded email below. Jenny Sue Dunner, Marnie Shaul, and I would like to offer our support for Sue’s comments and endorse them wholeheartedly. We believe there remain a number of concerns about the current proposal and we believe that Sue’s comments appropriately address our concerns. Please accept this as a full endorsement of her views.

Sincerely,

Lynne Battle
Jenny Sue Dunner
Marnie Shaul

Begin forwarded message:

From: Susan S [mailto:susanspk@verizon.net]
Sent: Monday, November 20, 2017 1:11 AM
To: 'Hisel-McCoy, Elza' <elza.hisel-mccoy@montgomeryplanning.org>; Casey Anderson <MCP-Chair@mncpc-mc.org>
Cc: Kronenberg, Robert <robert.kronenberg@montgomeryplanning.org>; 'Wright, Gwen' <gwen.wright@montgomeryplanning.org>; marco.fuster@montgomeryplanning.org; Andy Frank (andrew.frank@montgomeryparks.org) <andrew.frank@montgomeryparks.org>; 'Marcolin, John' <john.marcolin@montgomeryplanning.org>
Subject: Westbard Self Storage

Dear Mr. McCoy,

Please find below my comments on the Self Storage proposals. I will attach them as well.

Thank you so much for your attention.
Susan Spock

Comments on the Westbard Self Storage Facility Preliminary and Site Plans

Susan Spock, Bethesda Resident  11.19.17

I am writing regarding the proposed Westbard Self Storage Plans. I fully endorse the comments of Little Falls Watershed Alliance (LFWA), and raise further points below based on the language of the Sector Plan and the Zoning Code.
Like LFWA, I greatly appreciate the Staff’s critical work with the applicant to widen the path that enters the park, and to ensure that the proposed building will avoid the stream valley buffer. I also applaud the applicant’s significant dedication of an important and historic parcel for the Willett Branch Park, which the Sector Plan calls the “primary community asset in the Sector.” (p.19)

While I greatly appreciate the land dedication, I feel that the applicant’s proposal does not sufficiently reflect the Sector Plan’s intentions for the site and will materially harm the Sector Plan’s vision for the park. Therefore, I ask that the Planning Staff and Board require the applicant to make further modifications to its proposed development.

The Massive Building is Not Acceptable under the Zoning Code, Particularly if it Fails to Meet the Requirements of the Sector Plan

The applicant proposes a nine-story building with 193,527 SF on a plot of land that is zoned with a FAR of 2.5 for a 107,030 SF facility. The resulting FAR is effectively 4.5. The proposed excess density is produced in the building’s four “cellars.” Allowing four stories of usable space below ground is not consistent with other provisions of the Zoning Code.

First, while the Code’s gross floor area (GFA) and floor area ratio (FAR) calculations exclude “cellars,” it is unlikely that the Code drafters contemplated that cellars would be used extensively for money-making purposes so as to double the effective FAR. The other parts of buildings excluded from GFA are not meant to be used directly for the owner’s business, but are all peripheral or supportive, such as parking, open porches, non-leaseable space, public space, and mechanical equipment. It is likely that the drafters envisioned one “cellar” in a building that would mainly house mechanical equipment or storage.

Second, the Code’s parking requirements are based on GFA. Therefore, in Code Section 59.6.2.4, only 12 parking spaces are required for this facility, based on its 107,030 SF GFA. If the cellar floors were counted in the GFA, the applicant would have to provide an additional 8 spaces. It is highly unlikely that the Code’s drafters could have intended that developers could build multiple cellars with space used for their businesses, without requiring parking to service the resulting density.

Third, Section 59.4.8.3 of the Zoning Code states: “The total area of any partial floors or stories excluded from the maximum density calculation must not exceed the gross floor area of any full floor of the building.” This section pertains in part to mechanical equipment, but its intent seems to be to limit the excessive exclusion of space from GFA and FAR calculations. This language should be used to reduce the density that results from multiple cellars.

The applicant argues that these cellars are necessary for a return on its investment; but it seems incredible that the Code would allow developers to nearly double their effective FAR by going so extensively underground. However, assuming that the Planning Board permits the four cellars and a substantial increase in density, it is even more essential that as a trade-off, the project must strictly comply with the vision of the Sector Plan.

Therefore, the building needs to be smaller.

- It needs to make space on site for an underground SWM facility, outside the buffer, which will return the water from the roof and the street-level surfaces to the ground after filtration, leading to a clean and naturalized stream.
- It needs to allow for a wider and more welcoming path, which will act as a gateway to the new park.
- It needs to step back the side and rear of the building to reduce shadows and thus make the path and park more usable and inviting.
• It needs to create a more attractive rear of the building to make the building more park-like.

The Stormwater Management (SWM) Does Not Achieve Sector Plan Goals

The Sector Plan noted that the antiquated SWM system “has led to degraded water quality and habitat.” (p.4), in which the Willett Branch was previously “engineered as a storm drain . . . and] uncontrolled runoff is a major impact to the stream system.” The Sector Plan’s vision is for people to walk along “the naturalized Willett Branch . . . past the stream’s clean water.” (p.6) Clean water is needed for a natural habitat. Clean stream water comes from treated storm water that soaks into the earth and replenishes the groundwater that feeds the stream.

The current plan fails to create this clean stream water. As LFWA describes in its comments, the applicant’s plan does not treat any of the surface water and does nothing to replenish the groundwater that feeds the stream.

The Sector Plan requires that SWM “be done on-site where feasible” (p.58) to remedy the current “numerous environmental issues that resulted from the unconstrained development pattern.” The applicant claims that it is not feasible to fit the needed SWM treatment facilities on the site, because there is no room.

The reason there is “no room” is because the proposed building is too large. I agree with LFWA that if the Planning Board permits construction of extensive usable space beyond the FAR, it should also require on-site SWM facilities that replenish the groundwater and deliver fresh water to the stream, without invading the stream valley buffer.

The Path to the Park is Not Sufficiently Wide or Inviting

A major and frequently repeated goal of the Sector Plan is to increase and improve pedestrian and bicycle connections to and through the park. The Plan calls for creating “safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road. . . . [and] an interconnected system of safe, convenient and attractive routes between parks, civic spaces, plazas, residential communities and commercial buildings.” (p.50) [emphasis added]

The Sector Plan also requires a TDM strategy to improve those connections, stating that

a high-quality pedestrian network is essential to the success of reducing the demand on automobiles, allowing local trips to be made on foot rather than by car. Additionally, pedestrian activity is not simply about the activity of walking, it is about experiencing the community. . . . the quality of the pedestrian network is an important issue for most residents, workers and patrons of Westbard establishments. (p.33) [emphasis added]

The proposed path is not of sufficient quality to meet these standards of the Sector Plan.

First, the high wall of the building shadows the path excessively. It should be set back to allow natural light into the space. Although the path to the park in the applicant’s current plan is wider than in its original plan, it is still too narrow, at only 11 feet, with green space on either side. It will run between a 58- to 70-foot wall on one side and high retaining wall by McDonalds on the other side. Due to the height of these walls, the northern exposure, and the narrowness of the path, it is unlikely that the space will have any natural light or greenery. The applicant’s proposal does not create a safe or inviting path.

Second, given the building’s opening on River Road, the path should conform to the size of paths along River Road, to allow pedestrian and cycle traffic from River Road to flow easily to the park and beyond.
The Sector Plan calls River Road a Bicycle/Pedestrian Priority Area (p.78) and for that purpose, the proposed path is inadequate.

The Sector Plan shows River Road with a 15-foot sidewalk on both sides, plus an 11-foot cycle track on one side of the road to accommodate bikes. (p.36) Therefore, bikers and pedestrians along both sides of River Road have a combined 41 feet of paths, not counting extensive greenery on the sides.

Under the applicant’s plan, these cyclists and pedestrians would turn off River Road to use the path by the Self Storage facility to enter the park, only to crowd together on an 11-foot mixed-use path. If the path and adjacent greenery were designed to meet and continue the sidewalk on River Road, it would be at least 27 feet wide, but should be even wider to make room for cyclists from the bike path on the other side of River Road.

**The path should be a gateway to the stream valley park.** The Sector Plan intended that the path behind the HOC building would be a gateway to the park, connecting it to the commercial areas on both sides of the stream. (p.10, p.75). While the Plan considered that such a path might go through the American Plant Food/Roof Center/Talbert’s sites, their redevelopment is unlikely for the foreseeable future. The Self Storage path should be established as an alternative gateway to make the connection that the Sector Plan demands.

**The Back of the Building does Not Meet County Goals and Will Shadow the Park**

The proposed self storage facility does not meet the County’s goals for redevelopment of the area adjacent to the park. The Planning Board’s original Sector Plan called for this area to be zoned CRT, so that any new development would have eyes on the park and create cafes and other commercial opportunities that would make the park safer and more attractive.

In passing the Sector Plan, the Council “considered the potential to rezone properties along River Road to allow redevelopment, but determined that it was premature . . . [and] should be explored via a future master plan amendment to ultimately transform the River Road Corridor into an active, pedestrian-friendly boulevard with . . . opportunities for window shopping and café dining.” (p.78)

Meanwhile, the Sector Plan projected that the existing, very low-rise buildings would remain, and hoped that any new businesses would “strengthen the district’s tenant mix.” (p.20) Given the three other self-storage facilities within easy walking distance, the proposed facility hardly adds to the mix; nor does it create shopping or café opportunities that were envisioned by the Planning Board or Council.

Instead, we have a monolithic structure that will create a 70-foot wall facing the park with neither useful new businesses, nor eyes on the park. This enormous wall will cast a shadow over most of the park, harming its vegetation and making the entire center of the park less pleasant.

It is bad enough that the applicant’s proposal will not meet County goals for the area, but at least the proposed building should be better integrated into the park. The rear wall should be increasingly stepped back from the park to create less shadow, and should incorporate a green screen as a transition to the park.

***

The bottom line is that while Westbard Self Storage owns the land and can build a facility within the limits of the Zoning Code, it also needs to conform the building to the vision of the Sector Plan. I ask the Planning Staff and Board to think about the lasting negative impact of the current building on the park, and require modifications in the proposed plan to comply with the Sector Plan’s vision.

Thank you for your attention.
Sincerely,
Susan Spock

5206 Albemarle ST
Bethesda, MD 20816
susanspk@verizon.net
Dear Mr. Elza Hisel-McCoy and Planning Staff:

Please listen to your constituents. So many of us in the Westbard sector are not pleased with how development is being planned and executed. This is the latest in a series of actions that are pro-developers and anti-community. Make no mistake - your constituents are in favor of responsible development that enhances our communities. But increasingly it appears that plans are designed to maximize revenue generated from developments and maximize developers' goals at the expense of the communities' goals. 

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
1. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park.
2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.
3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.
4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. It’s bad enough Montgomery County literally buried this site for decades.

Regards,
Lykke Baum
5004 Fort Sumner Dr
Bethesda MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, [NAME, ADDRESS]
Bill and Jessica Bavinger
5500 Newington rd. Bethesda
20816

Sent from my iPhone
SUBJECT: Proposed Westbard Self-Storage Facility

Site Plan 820170110

Dear Mr. Hisel-McCoy and Planning Staff:

We are Westbard area residents. We strongly support the Little Falls Watershed Alliance (LFWA) letter, dated November 14, 2017, concerning the proposed Westbard self-storage facility, for the following reasons:

1. The Building would be too big. The storage facility proposes a building 70 feet high and 40 feet below ground. Every buildable inch is dedicated to it. Such a towering and unattractive pile will definitely not promote or enhance a naturalized Willett Greenway Park. Rather, it would be a concrete behemoth that detracts from the aesthetic success of the park.

2. Access to Willett Greenway Park would be too narrow. The pathway would be constricted to 18 feet – hardly an inviting gateway to the promised park.

3. Stormwater management would be inadequate. Please consider your duty as Montgomery County planners to ensure that this site treats surface runoff in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. We urge you to heed LFWA’s sound advice.

4. The eventual beautification and memorialization of the existing Cemetery Site is at risk. Please consider the negative effect of this oversized building on the historic Moses African Cemetery, which lies directly across the Willett from the planned storage site. The current plan for the proposed self-storage facility is totally inappropriate to the reverence and dignity due the Moses African Cemetery.

Our community has been under relentless siege from planners and developers for the past three years. We urge you to work together with LFWA to get this self-storage facility right, before irrevocable damage is done.

Yours truly,

Ambassador (ret.) Robert M. Beecroft
Mette Ottesen Beecroft, Ph.D.
5108 Scarsdale Road
Bethesda, Maryland 20816, USA
Landline: (301) 320-7698
Mobile (301) 717-1348
Good morning and thank you for your input. I am forwarding your email to the staff that are actively working with the applicant on this development.

Thanks.

Andy

Sent from Andy's iPhone

On Nov 16, 2017, at 12:09 AM, Jody and Bobby Benjamin <benjafamily@gmail.com> wrote:

Re: Westbard Self Storage Facility, Preliminary and Site Plans
Site Plan No. 820170110

Dear Mr. Frank:

The Westbard Self Storage facility will be adjacent to the heart of the new Willett Branch Park. How the stormwater is managed, how the buffer is treated, how the landscaping is done, and how the park is accessed will all have a huge impact on the success of the new park and restoration of the Willett Branch. The new park promises to be a national showcase for environmental improvement, and Montgomery County will have a lot to be proud of when it is completed. We have this chance to leave a legacy for our children. Please take the time now to be sure it is done right.

I support the input, ideas, and opinions of the Little Falls Watershed Alliance (LFWA). I know that you have already received their detailed letter, and I ask that you not only consider, but ensure the adoption, of all their points.

Thank you,

Jody Benjamin
5304 Sherrill Avenue
Chevy Chase, Maryland 20815
Brookdale neighborhood
Dear Mr. Elza Hisel-McCoy and Planning Staff:

The area between Little Falls Parkway and Westbard Avenue is truly ugly. It could be transformed into the vital green space planned for the community and all of Montgomery County. But, commercial facilities like Westbard Self-Storage want to claim their ability to expand. Please Leone give in to a developers pressure. As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground—every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway—this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,
Emily Best
5317 Wakefield Rd
Bethesda, Md. 20816
mybeste92@gmail.com
Dear Mr. Elza Hisel-McCoy and Planning Staff:
Please protect the Willett and the plans to honor those buried in the African American cemetary. I have lived in the neighborhood next to Little Falls Parkway called Green Acres since 1976. I grew up walking along Little Falls creek to Westmoreland Elementary School. In the 1950's, engineers transformed lovely creeks into a concrete horrors. The plans for the Willett Greenway Park can enhance this area for my community and all who visit the Crescent Trail. As the plans for the Westbard area proceed, the Westbard Self-Storage Facility is just pushing its boundaries beyond its present space. It's a totally utilitarian building which just keeps excess stuff. Its contribution to the community is minimal. Certainly, it doesn't encourage people to engage with nature or even other people. It could be located anywhere and perform its function.
As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constructed to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA's letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA's sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility 'right' for the community. Respectfully submitted,
Emily Best mybeste92@gmail.com 5317 Wakefield RdBethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. **The Building is too Big.** The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,
Marianne Borelli
5412 albia rd,
Bethesda, MD
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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4. **The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk.** Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility%

Chrysanthi Broikos
4919 Jamestown Road
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building.
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5. Please note I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns.
   Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,
Chrysanthe Broikos
4919 Jamestown Road
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

Margot Brooks
5620 Ogden Rd
Bethesda MD 20816

Sent from my iPhone
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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Regards,

Margot Brooks
5620 Ogden Rd
Bethesda
20816

Sent from my iPhone
I agree with my neighbors and friends of the Little Falls Watershed Alliance regarding the development of the self-storage facility at Westbard Site Plan No. 820170110. Please incorporate the recommendations of the Alliance as it accurately reflects the opinions of this writer and everyone I speak with about the Westbard development.

Thank You
Brian Burns
B.Burns Co. llc
301-329-4134 office
301-351-4891 cell
www.bburnscompany.com

CC:
Director Montgomery Planning Department - Wright, Gwen <gwen.wright@montgomeryplanning.org>
Planning Department - Kronenberg, Robert <robert.kronenberg@montgomeryplanning.org>
Department of Permitting Services (in charge of Stormwater Permits) Mark Etheridge <mark.etheridge@montgomerycountymd.gov>
Department of Permitting Services (in charge of Stormwater Permits) David Kuykendall <david.kuykendall@montgomerycountymd.gov>
Environmental Planner - Planning Department - Marco Fuster <marco.fuster@montgomeryplanning.org>
Planning Department Staff - John Marcolin <john.marcolin@montgomeryplanning.org>
Montgomery Parks Planner - Susanne Paul <susanne.paul@montgomeryparks.org>
Berliner's Office, Councilmember <councilmember.berliner@montgomerycountymd.gov>
Director Montgomery Parks - Mike Riley <Mike.Riley@montgomeryparks.org>
Montgomery Parks Senior Planner - Andy Frank <Andrew.Frank@MontgomeryParks.org>
Chair, Planning Board - Casey Anderson <MCP-Chair@mnccpc-mc.org>
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA's letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA's sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards, [NAME, ADDRESS]

Thanks
Margaret Champagne

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,

Jane Croft
6014 Overlea Rd
Bethesda, 20816
Sent from my iPhone
TO: countyemails@savewestbard.org RE: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery! Dear Mr. Elza Hisel-McCoy and Planning Staff: As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA's letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA's sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community. Respectfully submitted, Kathleen Dameo, 6214 Vorlich Lane, Bethesda 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.
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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, [NAME, ADDRESS]
Camilla David
5307 Albemarle Street
20816

Sent from my iPad
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground — every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.
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5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns.
Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,
Camilla David
5307 Albemarle Street
20816

Sent from my iPad
Hisel-McCoy, Elza

From: Cornelius Davies <cdstuff@verizon.net>
Sent: Monday, November 20, 2017 10:55 AM
To: countymails@savewestbard.org
Cc: Kathy Davies
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Why? Why? Can't we maintain a neighborhood community...like we have see in other major cities .... Like even Berlin, Vienna, etc.

Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards, Cornelius Davies,
4920 Earlston Drive, Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA's reasonable concerns.

Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards,

Adrienne Deming

5325 Westbard Ave., #903
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, because:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground and every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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5. I will not patronize Westbard Self-Storage in the future unless the plans change.

Elizabeth Dietel  
5109 Duvall Drive  
E. Dietel  
endjed2@gmail.com
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Bethesda-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. Please note and act: Parks in Bethesda are being undermined from this proposal to the Ourisman encroachment to the loss of the Capital Crescent Trail between Bethesda and Silver Spring. We will end up with a badly planned and unattractive community.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

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Regards,
Maj-Britt Dohlie
Bethesda
mdohlie@gmail.com
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident for many decades, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground—every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Regards,
Karen Edwards

5215 Marlyn Drive
Bethesda, MD. 20816
Dear Mr. Elza Hisel - McCoy and Planning Staff:

As a Westbard - area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self - Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards,

Anita B. Farb
5713 Newington Road
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy:

You have heard from me in the past regarding projects in Downtown Bethesda, but today I am writing in support of our neighbors just to the west and in support of the LFWA letter dated November 14, 2017 regarding the Westbard Self-Storage Facility.

I visited the location last weekend and took a tour of the whole Willett Branch through Westbard. To say there have been mistakes made in this area in the past would be a serious understatement. The previous treatment and current condition of this waterway is shameful. This project presents an opportunity for improvement of an area that is currently a complete mess - but it needs to be done in a way that works to really get it right.

Please ensure there is sufficient space for the public pedestrian access. This will be one of the main (and hopefully safe) access points for pedestrians/bikers to/from the Capital Crescent Trail - to/from the future park - and onward to/from the rest of Westbard. As you are aware, we have seen and documented other locations where there was too little space provided for pedestrian and bike passage. There are also problems when there is too little space allocated for needed trees and greenery. It is very hard to go back and correct these mistakes after the fact.

Please consider revising plans to at least provide a step-back for the north side of the building (facing the pedestrian access to the future Willett Branch) and west side of the building (facing the future parkland). Having the retaining wall on one side and another tall wall of a self-storage building (which is not a particularly "activating" use) will not necessarily be an inviting gateway to the future park. A step-back could help make the area appear and feel more light and open.

Last, please be certain that this site treats surface run-off in a more responsible manner. The amount of impervious surface in this vicinity that drains directly into the Willett Branch is very problematic. Now is a chance to improve that situation in a small way. And hopefully it will set the stage to improve the situation in a much bigger way in the future with the implementation of more pervious surface, the future park, and eventually a naturalized stream.

Thank you,
Amanda Farber
Example of trash and poor condition of the bank(buffer) of the Willett Branch.
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

David Forman, 5344 Falmouth Road, Bethesda, MD 20816
TO: countyemails@savewestbard.org
RE: Westbard Self-Storage Facility

- Site Plan 820170110
Protect the Willett and the Cemetery,

Dear Mr. Elza HiselMcCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self Storage Facility. Although I am using text from others, I personally believe and endorse these comments:

namely:
1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground, every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Regards,
David S. Forman
5344 Falmouth Road
Bethesda, MD 20816
(301) 229-6869
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards, Patricia Friedman, MD
4811 Grantham Ave.
Chevy Chase, MD 20815
Dear Mr. Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Liza Fues
Bethesda
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns.
Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, Lynn Gallagher
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,
Frederick H. Graefe
5109 Scarsdale Road
Bethesda MD 20816

Frederick H. Graefe
202.494.6799
Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Frederick H. Graefe
5109 Scarsdale Road
Bethesda MD 20816
202.494.6799 (m)
Dear Mr. Elza Hisel-McCoy
and Planning Staff: As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Please heed LFWA’s sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Mr. McCoy, as a resident of Kenwood Place Condominium, I am very concerned about the County’s support of excellence in planning. I am confident that you and your staff will encourage the Developer to bring forth a more suitable plan for this lovely site.

Best regards,

Claude Groven
Dear Mr. Elza Hisel-McCoy and Planning Staff: As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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Mr. McCoy, as a resident of Kenwood Place Condominium, I am very concerned about the County's support of excellence in planning. I am confident that you and your staff will encourage the Developer to bring forth a more suitable plan for this lovely site.

Best regards,
Elizabeth Twomey Groven
240-396-6328
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground — every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, [NAME, ADDRESS]

Sent from my iPad
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,
Mary Hamilton
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,
Janet Hewitt
Wood Acres resident
Bethesda, MD

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

I have lived in the Westbard area since 1993. As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground — every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Regards,

Gwenn Hibbs
5805 Augusta Lane
Bethesda, MD 20816
Holland, Suzanne <SHolland@cbmove.com>

Monday, December 04, 2017 5:33 AM

countyemails@savewestbard.org; kmckone@1784holdings.com

Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. McKone and Mr. Elza Hise-McCoy and Planning Staff:
As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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Regards, [NAME, ADDRESS]

Suzanne Hollander

This email may be confidential. If you are not the intended recipient, please notify us immediately and delete this copy from your system. Nothing in this email creates a contract for a real estate transaction, and the sender does not have authority to bind a party to a contract via written or verbal communication.
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,
Barbara F Hughes
6309 Avalon Dr
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,

Barbara F Hughes
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Regards, [NAME, ADDRESS]
Richard and June Humbert
4901 Scarsdale Road
Bethesda, Md. 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Lastly, in regards to Stormwater Management, the County required us to grade, landscape, and manage run-off when we renovated our home in Green Acres, only blocks from the Westbard Self-Storage Facility, EVEN THOUGH the original footprint was not increased. I expect the County to hold businesses to the same high standards to which local homeowners must adhere.

Regards,
Carol Anne Jarrett
4916 Greenway Drive
Bethesda MD 20816
From: Mary Sue Johnson <johnson.marysue@gmail.com>
Sent: Monday, December 04, 2017 9:26 AM
To: countyemails@savewestbard.org; kmckone@1784holdings.com
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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Regards,

MarySue Johnson
Westbard Resident 20816

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards, Patricia Johnson, 5301 Oakland Road, Chevy Chase, Md. 20815
From: Mary Sue Johnson <johnson.marysue@gmail.com>
Sent: Monday, December 04, 2017 9:27 AM
To: countyemaints@savewestbard.org; kmckone@1784holdings.com
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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Regards,

Ronald Johnson
Westbard Resident
20816

Sent from my iPhone
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Regards,

Jen Khovananth
5808 Namakagan Rd

Sent from my iPhone
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Regards,

Hilary Klein

5208 Belvoir Drive
Bethesda, MD 20816
From: Nancy Klotho <nkmombat@yahoo.com>
Sent: Tuesday, November 21, 2017 10:36 PM
To: countyemails@savewestbard.org
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Nancy Klotho
4909 Brookeway Dr.
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards, [NAME, ADDRESS]

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Mary Knight
Bethesda MD
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Respectfully submitted,

Patricia Kolesar, 5508 Jordan Road, Bethesda, MD 20816

Patricia E. Kolesar for SaveWestbard
pkoles@verizon.net

cell: 301-503-4109
Dear Mr. McKone, Mr. Dugan, Mr. Elza Hisel-McCoy, and all:

Thank you for providing a copy of the attached Westbard Self-Storage’s comments in the referenced matter.

SaveWestbard has no expertise regarding environmental matters, and so we offer no comment on the back-and-forth regarding environmental specifics.

However, that being said, we – the residents and potential business customers for Westbard Self-Storage -- simply want Mr. McKone to know that we support the comments offered our local environmental group, the Little Falls Watershed Alliance, regarding the Westbard Self-Storage matter. We trust LFWA’s work, we trust their comments, we support them, and we recognize LFWA’s valiant fight to make the promised Willett Greenway Park a beautiful reality for the Westbard community. LFWA’s work in the community is nothing short of heroic.

We do understand that you are obligated to file a response to LFWA’s concerns which are outlined in their November 14, 2017 letter to planners; but that does not change the fact that we – the residents and potential business customers of Westbard Self-Storage -- continue to support LFWA’s comments and their leadership regarding the Westbard Self-Storage development.

We are not obligated to “like” the current development plans; and we are also not obligated to patronize Westbard Self-Storage.

I hope to testify on December 14th -- both broadly in support of LFWA’s comments, and also as a voice for the voiceless (that is, for the residents, whose vision for our community has been routinely ignored over the past three years).

Mr. Hisel-McCoy, could you please possibly confirm that SaveWestbard may comment at the hearing on December 14th?

Mr. McKone – we appeal directly to you, the owner, to please adjust your plans for Westbard Self-Storage to resolve LFWA’s reasonable concerns. Residents’ frustration with development projects in the Westbard area is very real and very deeply felt.

Please know that even if the Westbard Self-Storage plans meet all necessary county requirements and regulations (we presume that they do), the residents’ collective opinion of your project will not change – and we have no power in this situation other than to refuse to patronize Westbard Self-Storage.

Many thanks for your gracious attention,
From: Timothy Dugan [mailto:TDoug@shulmanrogers.com]
Sent: Saturday, December 2, 2017 10:02 AM
To: Elza Hisel-McCoy (elza.hisel-mccoy@montgomeryplanning.org) <elza.hisel-mccoy@montgomeryplanning.org>; Bradford ("Brad") Fox (bfox@bohlereng.com) <bfox@bohlereng.com>; Ken Wallis (kwallis@wetlandstudies.com) <kwallis@wetlandstudies.ccm>; Bethany Rodgers (bethany.rodgers@bethesdamagazine.com) <bethany.rodgers@bethesdamagazine.com>; Sarah Morse (morsekathan@gmail.com) <morsekathan@gmail.com>; Patricia E. Kolesar (pkoles@verizon.net) <pkoles@verizon.net>; Kelly Mckone <kmckone@1784holdings.com>
Subject: Westbard Self Storage Prel. Plan 120170280 Site Plan B20170110

Dear Mr. Hisel-McCoy
Please consider the attached letter. Thank you.
Tim Dugan

TIMOTHY DUGAN
ATTORNEY AT LAW

tdugan@shulmanrogers.com | T 301.230.5228 | F 301.230.2891

SHULMAN, ROGERS, GANDAL, PORDY & ECKER, P.A.
12505 PARK POTOMAC AVENUE, 6TH FLOOR, POTOMAC, MD 20854

ShulmanRogers.com | BIO | VCARD

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Dear Mr. Elza Hisel-Mccoy and Planning Staff:

As a Westbard-area resident, I support the LFWS Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWS’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWS’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

Brian Krantz

If you always do what you’ve always done, you’ll always get what you’ve always got. #SaveMoCo #CramThemInAmalyn
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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Tall buildings have a dramatic negative impact, wherever they are and especially when they are isolated and are alongside a park. I dare say the existence of the storage facility of the proposed size will lessen anybody's - private citizen, developer, or Montgomery County - desire or willingness to undertake to improve Willett Creek, a project that will take significant amounts of money.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Please do the right thing for the Westbard area, for the community, and for Montgomery County, and do not approve the proposed self-storage facility.

Regards,

Rich Landfield, 5101 baltan road, bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, Gregory E. Lawler, 5216 Chamberlin Avenue, Chevy Chase 20815
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards, [NAME, ADDRESS]

Emmy Le Bigre
5504 Pollard rd
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

John and Amy Livingood
5940 Searl Terrace
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:
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5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns.

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5940 Searl Terrace
Bethesda, MD 20816
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2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. We want our neighbors to feel welcome and to encourage access to the park. Restricted access does not help with this and makes the park difficult to find.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

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Our community has been under siege from planners and developers for the past three years.

Let's work to get this Self-Storage Facility "right" for the community.

Regards,
Deborah & Patrick Logsdon
4852 Park Avenue
Bethesda MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,

Jill Lucas
5315 Albemarle Street
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Sincerely,
Alan Mairson
5624 Lamar Road
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,

Michael Maman, from the Town of Somerset
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,

Linda Manning
5611 Harwick Road
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards, Helen Martin Berns
4918 Brookeway Drive
Bethesda, MD 20816

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,

Rachel Renzy Meima
4616 Bayard Boulevard
Bethesda, MD 20816

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards, Emilia (Ilia) Menocal

Ilia Menocal
5215 Westbard Av.
Bethesda, MD 20816
301-229-1319 (H)
202-297-2422 (C)

Sent from my iPhone
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,

Emilia (Ilia) Menocal
Ilia Menocal
5215 Westbard Av.
Bethesda, MD 20816
301-229-1319 (H)
202-297-2422 (C)

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff: As a former Westbard-area resident, I do support the LFWA Letter, dated November 14, 2017, having to do with the referenced Westbard Self-Storage Facility, namely: 1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park. 2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park. 3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA's letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA's sound advice. 4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community. Regards, Jeffrey R. Meredith, 208 Redland Boulevard #M, Rockville, MD 20850 301-869-9576(H) 301-312-9146(C)
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,

Meredith Mirkow
5917 Searl Terrace
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility “right” for the community.

Regards,
Mary and John Morrissey
(Kenwood)

Sent from my iPad
Dear Mr. Elza Hisel-McCoy and Planning Staff:

I live at 5329 Willard Avenue. I frequent the Westbard area on a daily basis. I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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I request that you consider a setback and height that protects the stream valley. Also consider a redesign for taller buildings on the opposite site of the property rather than abutting the creek. Since the long-term vision and goal is to daylight a buried stream valley, don’t miss this once in a generation opportunity to make a difference.

Sincerely,

Manuel Ochoa
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards,

Margie Ott
4908 Westway Dr
BETHESDA, MD 20816

Sent from my iPhone
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Regards,

Ben Pekkanen
5101 Newport Ave.
Bethesda MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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Regards,

Sinisa Peric
5 ARDMORE CT
BETHESDA, MD 20816

------------------------ life takes engineering s.peric@ieee.org

We Say GoodBye To Sally Fields
iflperfecttouch.com
http://thirdpartyoffers.netzero.net/TGL3231/5a12d5c0de27d56c0258est04duc
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a general note before you take the views expressed below, maybe Montgomery County needs to reconsider building nothing but luxury homes everywhere and take the pressure off “needing” to build such a monstrous self storage facility - this presumes there IS an absolute need. And please, whatever you do, do not allow the car repair shops and other necessary things in the immediate area, be changed to more housing and coffee shops and “upscale retailers” that we can find elsewhere. If zoning of plans or whatever technically would have to be changed, then please do so or direct me to what would need to be changed if our necessary services such as car repair are already on the chopping block. Thank you, and please see below.

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Regards,

Elizabeth Perry and David Stern
Chevy Chase, MD
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Thank you for your attention.

Best regards –

Elizabeth Richardson
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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Regards,

Kathleen Rogers
6221 Winnebago rd
Bethesda md 20816

Sent from my iPhone
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Regards,

[NAME, ADDRESS]
Emilio Sacerdoti
5307 Albemarle Srreet
20816

Sent from my iPad
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Regards, Richard and Carol Schleicher
6103 Wynnewood Road
Bethesda, Maryland 20816

Sent from my iPad
Dear Ms. Wright:

I am very concerned about the proposed Westbard Self Storage Facility which will be built adjacent to the proposed Willett Branch Park. Appropriately, the location has been moved off the stream buffer, but other problems remain:

1. The building is too big for the site, nearly doubling the FAR by going many levels underground. Going underground is a good idea, but it should not obviate outdoor space around the building.
2. Proposed access to the Willett Branch Park at 18-20 feet is too narrow. The entrance to the park should comply with p. 51 of the Sector Plan, which calls for “safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road.”
3. The proposal for stormwater management is inadequate. It depends entirely on a green roof which adds nothing to improve natural infiltration at ground level. Infiltration techniques such as pervious pavement, dry wells and soil augmentation should be required.

Restoration of the Willett Branch and creation of a new greenway park is the central amenity of the Westbard Sector Plan. It will provide the only meaningful green space in the area and will be important to local residents and users of the Capital Crescent Trail.

It is a great idea to put half of the storage facility underground because then the footprint can be half the size allowing for better surrounding space including a welcoming entrance to the park, more ground-level green space and better water management.

Sincerely yours,
Deborah Schumann
6804 Tulip Hill Terrace
Bethesda, Md. 20816
Dear Ms. Hisel-McCoy,

Roger Berliner suggested that I contact Neil Branstein with my comments regarding the Westbard Sector. Now I understand that you are in the position to evaluate the proposal.

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Regards, [NAME, ADDRESS]

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Kathryn Scott
5700 Massachusetts Ave
Bethesda MD 20816
301-229-8331
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5700 Massachusetts Ave
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301-229-8381
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Regards,

Gabriel Sensenbrenner
5805 Marengo road

*******

Email too brief? Answers at http://emailcharter.org
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In short it is too damn big of a monstrosity to be put there.

Regards,

Robert J. Shaffer
202-365-6674
Kenwood Resident
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 4, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards, [NAME, ADDRESS]
Carol and Alan Shiff
5145 Westbard Ave

Sent from my iPhone
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Thank you for your time,

Sherburne Laughlin and Brad Shingleton
5719 Newington Road, Bethesda
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Mary Shivanandan
4711 Overbrook Rd
Bethesda MD 20816
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1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground — every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. Please consider your duty as a Montgomery County planner to ensure that this site treats surface run-off in a responsible manner. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.

Regards,
Radhika Sinha
5206 Ridgefield road
Bethesda Md 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Thank you for your consideration of this issue of great importance to residents of the Westbard community.

Larry Slifman
4423 Chalfont Pl.
Bethesda, MD 20816
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James Smalhout
From: Paul Smith <paulsmithjr@hotmail.com>
Sent: Monday, November 20, 2017 6:37 AM
To: countyemails@savewestbard.org
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Dear Mr. Elza Hisel-McCoy and Planning Staff:

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Regards,
Paul and Claudia Smith
6117 Massachusetts Avenue
Bethesda, MD 20816
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Regards, [NAME, ADDRESS]

Jay Sommerkamp
4813 Ft. Sumner Drive
Bethesda, MD 20816

Sent from my iPhone
Jay
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Regards,
Stephanie Soofer
5615 Newington Rd
Bethesda, MD 20816

Sent from my iPhone
Hisel-McCoy, Elza

From: Stephanie and Robert Soofer <rsoofer@msn.com>
Sent: Monday, December 04, 2017 6:18 AM
To: countyemails@savewestbard.org; kmckone@1784holdings.com
Subject: Westbard Self-Storage Facility - Site Plan 820170110 - Protect the Willett and the Cemetery!

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:
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Regards,
Stephanie Soofer

Sent from my iPhone
Comments on the Westbard Self Storage Facility Preliminary and Site Plans

Susan Spock, Bethesda Resident   11.19.17

I am writing regarding the proposed Westbard Self Storage Plans. I fully endorse the comments of Little Falls Watershed Alliance (LFWA), and raise further points below based on the language of the Sector Plan and the Zoning Code.

Like LFWA, I greatly appreciate the Staff’s critical work with the applicant to widen the path that enters the park, and to ensure that the proposed building will avoid the stream valley buffer. I also applaud the applicant’s significant dedication of an important and historic parcel for the Willett Branch Park, which the Sector Plan calls the “primary community asset in the Sector.” (p.19)

While I greatly appreciate the land dedication, I feel that the applicant’s proposal does not sufficiently reflect the Sector Plan’s intentions for the site and will materially harm the Sector Plan’s vision for the park. Therefore, I ask that the Planning Staff and Board require the applicant to make further modifications to its proposed development.

The Massive Building is Not Acceptable under the Zoning Code, Particularly If It Fails to Meet the Requirements of the Sector Plan

The applicant proposes a nine-story building with 193,527 SF on a plot of land that is zoned with a FAR of 2.5 for a 107,030 SF facility. The resulting FAR is effectively 4.5. The proposed excess density is produced in the building’s four “cellars.” Allowing four stories of usable space below ground is not consistent with other provisions of the Zoning Code.

First, while the Code’s gross floor area (GFA) and floor area ratio (FAR) calculations exclude “cellars,” it is unlikely that the Code drafters contemplated that cellars would be used extensively for money-making purposes so as to double the effective FAR. The other parts of buildings excluded from GFA are not meant to be used directly for the owner’s business, but are all peripheral or supportive, such as parking, open porches, non-leaseable space, public space, and mechanical equipment. It is likely that the drafters envisioned one “cellar” in a building that would mainly house mechanical equipment or storage.

Second, the Code’s parking requirements are based on GFA. Therefore, in Code Section 59.6.2.4, only 12 parking spaces are required for this facility, based on its 107,030 SF GFA. If the cellar floors were counted in the GFA, the applicant would have to provide an additional 8 spaces. It is highly unlikely that the Code’s drafters could have intended that developers could build multiple cellars with space used for their businesses, without requiring parking to service the resulting density.

Third, Section 59.4.8.3 of the Zoning Code states: “The total area of any partial floors or stories excluded from the maximum density calculation must not exceed the gross floor area of any full floor of the building.” This section pertains in part to mechanical equipment, but its intent seems to be to limit the excessive exclusion of space from GFA and FAR calculations. This language should be used to reduce the density that results from multiple cellars.

The applicant argues that these cellars are necessary for a return on its investment; but it seems incredible that the Code would allow developers to nearly double their effective FAR by going so extensively underground. However, assuming that the Planning Board permits the four cellars and a
substantial increase in density, it is even more essential that as a trade-off, the project must strictly comply with the vision of the Sector Plan.

Therefore, the building needs to be smaller.

- It needs to make space on site for an underground SWM facility, outside the buffer, which will return the water from the roof and the street-level surfaces to the ground after filtration, leading to a clean and naturalized stream.
- It needs to allow for a wider and more welcoming path, which will act as a gateway to the new park.
- It needs to step back the side and rear of the building to reduce shadows and thus make the path and park more usable and inviting.
- It needs to create a more attractive rear of the building to make the building more park-like.

The Stormwater Management (SWM) Does Not Achieve Sector Plan Goals

The Sector Plan noted that the antiquated SWM system “has led to degraded water quality and habitat.” (p.4), in which the Willett Branch was previously “engineered as a storm drain . . . [and] uncontrolled runoff is a major impact to the stream system.” The Sector Plan’s vision is for people to walk along “the naturalized Willett Branch . . . past the stream’s clean water.” (p.6) Clean water is needed for a natural habitat. Clean stream water comes from treated storm water that soaks into the earth and replenishes the groundwater that feeds the stream.

The current plan fails to create this clean stream water. As LFWA describes in its comments, the applicant’s plan does not treat any of the surface water and does nothing to replenish the groundwater that feeds the stream.

The Sector Plan requires that SWM “be done on-site where feasible” (p.58) to remedy the current "numerous environmental issues that resulted from the unconstrained development pattern.” The applicant claims that it is not feasible to fit the needed SWM treatment facilities on the site, because there is no room.

The reason there is “no room” is because the proposed building is too large. I agree with LFWA that if the Planning Board permits construction of extensive usable space beyond the FAR, it should also require on-site SWM facilities that replenish the groundwater and deliver fresh water to the stream, without invading the stream valley buffer.

The Path to the Park is Not Sufficiently Wide or Inviting

A major and frequently repeated goal of the Sector Plan is to increase and improve pedestrian and bicycle connections to and through the park. The Plan calls for creating “safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road. . . [and] an interconnected system of safe, convenient and attractive routes between parks, civic spaces, plazas, residential communities and commercial buildings.” (p.50) [emphasis added]

The Sector Plan also requires a TDM strategy to improve those connections, stating that
a high-quality pedestrian network is essential to the success of reducing the demand on automobiles, allowing local trips to be made on foot rather than by car. Additionally, pedestrian activity is not simply about the activity of walking, it is about experiencing the community. . . . the quality of the pedestrian network is an important issue for most residents, workers and patrons of Westbard establishments. (p.33) [emphasis added]

The proposed path is not of sufficient quality to meet these standards of the Sector Plan.

First, the high wall of the building shadows the path excessively. It should be set back to allow natural light into the space. Although the path to the park in the applicant’s current plan is wider than in its original plan, it is still too narrow, at only 11 feet, with green space on either side. It will run between a 58- to 70-foot wall on one side and high retaining wall by McDonalds on the other side. Due to the height of these walls, the northern exposure, and the narrowness of the path, it is unlikely that the space will have any natural light or greenery. The applicant’s proposal does not create a safe or inviting path.

Second, given the building’s opening on River Road, the path should conform to the size of paths along River Road, to allow pedestrian and cycle traffic from River Road to flow easily to the park and beyond. The Sector Plan calls River Road a Bicycle/Pedestrian Priority Area (p.78) and for that purpose, the proposed path is inadequate.

The Sector Plan shows River Road with a 15-foot sidewalk on both sides, plus an 11-foot cycle track on one side of the road to accommodate bikes. (p.36) Therefore, bikers and pedestrians along both sides of River Road have a combined 41 feet of paths, not counting extensive greenery on the sides.

Under the applicant’s plan, these cyclists and pedestrians would turn off River Road to use the path by the Self Storage facility to enter the park, only to crowd together on an 11-foot mixed-use path. If the path and adjacent greenery were designed to meet and continue the sidewalk on River Road, it would be at least 27 feet wide, but should be even wider to make room for cyclists from the bike path on the other side of River Road.

The path should be a gateway to the stream valley park. The Sector Plan intended that the path behind the HOC building would be a gateway to the park, connecting it to the commercial areas on both sides of the stream. (p.10, p.75). While the Plan considered that such a path might go through the American Plant Food/Roof Center/Talbert’s sites, their redevelopment is unlikely for the foreseeable future. The Self Storage path should be established as an alternative gateway to make the connection that the Sector Plan demands.

The Back of the Building does Not Meet County Goals and Will Shadow the Park

The proposed self storage facility does not meet the County’s goals for redevelopment of the area adjacent to the park. The Planning Board’s original Sector Plan called for this area to be zoned CRT, so that any new development would have eyes on the park and create cafes and other commercial opportunities that would make the park safer and more attractive.

In passing the Sector Plan, the Council “considered the potential to rezone properties along River Road to allow redevelopment, but determined that it was premature . . . [and] should be explored via a future master plan amendment to ultimately transform the River Road Corridor into an active, pedestrian-friendly boulevard with . . . opportunities for window shopping and café dining.” (p.78)
Meanwhile, the Sector Plan projected that the existing, very low-rise buildings would remain, and hoped that any new businesses would “strengthen the district’s tenant mix.” (p.20) Given the three other self-storage facilities within easy walking distance, the proposed facility hardly adds to the mix; nor does it create shopping or café opportunities that were envisioned by the Planning Board or Council.

Instead, we have a monolithic structure that will create a 70-foot wall facing the park with neither useful new businesses, nor eyes on the park. This enormous wall will cast a shadow over most of the park, harming its vegetation and making the entire center of the park less pleasant.

It is bad enough that the applicant’s proposal will not meet County goals for the area, but at least the proposed building should be better integrated into the park. The rear wall should be increasingly stepped back from the park to create less shadow, and should incorporate a green screen as a transition to the park.

* * *

The bottom line is that while Westbard Self Storage owns the land and can build a facility within the limits of the Zoning Code, it also needs to conform the building to the vision of the Sector Plan. I ask the Planning Staff and Board to think about the lasting negative impact of the current building on the park, and require modifications in the proposed plan to comply with the Sector Plan’s vision.

Thank you for your attention.

Sincerely,

Susan Spock

5206 Albemarle ST
Bethesda, MD 20816
susanspk@verizon.net
November 16, 2017

To: Elza Hisel-McCoy
   elza.hisel-mccoy@montgomeryplanning.org

From: Mary Staley, Resident of Bethesda, Neighbor in the Little Falls Watershed

Re: Westbard Self Storage Facility, Preliminary and Site Plans
    Site Plan No. 820170110

Dear Mr. Hisel-McCoy and Planning Staff,

I am a Bethesda resident and live near the planned Westbard Self Storage Facility. I am also a member of the Little Falls Watershed Alliance (LFWA), an environmental stewardship group for the Little Falls watershed.

Along with LFWA, I am concerned with the design and construction of the Westbard Self Storage Facility, as it not only is in our watershed, but it is the first building to be redeveloped that abuts the proposed Willett Branch Park. The restoration of the Willett Branch and formation of the new greenway park is the central amenity of the Westbard Sector plan. It is a tremendous vision for the area. When it is realized, it will be a centerpiece for the Montgomery Parks system and a huge benefit not only to the residents of the area, but to the whole county. With its location off the very popular Capital Crescent Trail, hundreds of people will use it to enjoy the stream and the beauty of the natural area. It will provide the only meaningful green space for the sector. Because the Westbard Self Storage facility is located in the heart of the proposed park, careful attention must be paid to how the parcel is developed to ensure the success of the park.

The LFWA has had frequent meetings with the planning staff on the plans for the Westbard Self Storage site and has been very pleased that the building has been moved out of the stream buffer. I am also pleased to see the dedication of parcel 177. This parcel, on the banks of the Willett Branch, is the first dedication for the new park.

However, I still have the following concerns:

- **Stormwater Management Concept Must Include Infiltration Techniques:**
  The storage facility abuts the Willett Branch. At this time, the stream is totally contained in a trapezoidal concrete channel. However, the Sector Plan calls for naturalizing the stream and connecting it with the ground water as part of the formation of the Willett Branch Park. This makes recharging the ground water in this area of paramount importance.
The Westbard Storage Facility Stormwater Management Concept depends entirely on green roof and other non-infiltration techniques. While a green roof does provide heating and cooling benefits, from a water quality perspective, a green roof is not satisfactory as it does not provide groundwater recharge. Without infiltration, the site will not function as “woods in good condition”, a goal of the County’s stormwater management plan. The Maryland Stormwater Management Act of 2007 mandates that stormwater standards must be applied to best mimic pre-developed conditions. Infiltration is critical to achieving this goal.

The developer has stated that the constraints of the property and soil type have made it impossible to implement in-ground Environmental Site Design. LFWA engaged Diane Cameron, GreenGrowth LLC, to review the stormwater plan, and she has identified several areas where the developer can employ techniques that will allow the rain water to soak into the ground, including using pervious pavement, infiltration buffers and dry wells. MS. Cameron also suggests that the developer consider soil augmentation and infiltration trench/basins. I request that the developer be required to revisit the SMC and seriously explore her suggestions before submitting the final stormwater management plan for approval.

I am further concerned that the engineering study and recommendations for the site are based on a building that has a 10-foot cellar, not 40 feet of underground area. There needs to be more clarity on this from the applicant. Can their geotechnical study be adequate if it is based on the assumption of only one lower level, not three or four?

- **The Building is Too Big for the Site:**
  Along with LFWA, I believe a fundamental problem with the plan is that the proposed building is too large for the site. The developer is constructing a building with almost double the usable space permitted by the FAR by going many levels below ground. While this additional cellar space may not be considered part of the FAR as it is traditionally deemed “unusable,” in the case of a storage facility, it is, in fact, very usable space. With the usable space extending so far beyond the zoning code’s contemplation, I feel that the building footprint should be further reduced to allow for infiltration of environmental site design stormwater treatment that is so necessary for the health of the new Willett Branch Park as discussed above. Reducing the footprint will also allow more amenity open space on the parcel and greater setbacks to avoid shadow on the park areas, as well as a wider path into the park from River Road.

- **Access to Park is Not Welcoming:**
  The proposed 18 or 20-foot pathway to the park is too small to be more than a narrow driveway. With the 70-foot wall on one side and a 20-foot retaining wall on the other, visitors will not be welcomed into the park, but rather have to pass through a dark alleyway to get there. A 24-foot path would be more appropriate. Further, stepping back the building would allow for more light in this area. The entrance to the park should
comply with p. 51 of the Sector Plan, which calls for "safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road."

- **Interface with Park at Rear of Property is Unattractive:**
  One of the concerns that has been raised continually throughout the redevelopment process is the need for an attractive interface with the park: buildings should embrace the park rather than turn their backs to it. While this is a challenge with a self-storage facility, this building makes no effort to embrace the park with anything but a 70-foot wall. The rear of the building is especially unattractive, and given the great height, will cast a shadow over the new park. The rear of the building should be stepped back with green roofs on each level and liberal use of green screens. It would make a beautiful transition to the park and a very attractive self-storage facility.

  Landscaping for the rear seems to be limited to grass. I hope that the developer will work with Parks and the Department of Environmental Protection to install native plantings appropriate to the building's stream-side location.

The Westbard Self Storage facility will be adjacent to the heart of the new Willett Branch Park. How the stormwater is managed, how the buffer is treated, how the landscaping is done, and how the park is accessed will all have a huge impact on the success of the new park and restoration of the Willett Branch. The new park promises to be a national showcase for environmental improvement, and Montgomery County will have a lot to be proud of when it is completed. We have this chance to leave a legacy for our children. Please take the time now to be sure it is done right.

Thank you,

Mary Staley
5805 Ogden Road
Bethesda, MD
marytstaley@gmail.com
301.651.6950

cc: Gwen Wright, Montgomery Planning
Robert Kronenberg, Montgomery Planning
Marco Fuster, Montgomery Planning
David Kuykendall, Department of Permitting Services
Mark Etheridge, Department of Permitting Services
Roger Berliner, Montgomery County Council
Mike Riley, Montgomery Parks
Brooke Farquhar, Montgomery Parks
Susanne Paul, Montgomery Parks
Andy Frank, Montgomery Parks
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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

Charlotte Stewart

5101 River Road #1418, Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hise-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground – every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

2. The Access to the Park is too Narrow. The pathway to the Willett Greenway Park will be constricted to an 18-foot pathway – this is not conducive to an inviting gateway to our promised park.

3. Stormwater Management is Insufficient. LFWA’s letter explains why surface water must be infiltrated, rather than directed into stormwater drains. Please heed LFWA’s sound advice.

4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans will not enhance the reverence due the Moses African Cemetery.

5. I will not patronize Westbard Self-Storage in the future unless the plans are altered to incorporate LFWA’s reasonable concerns.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,
Charlotte Stewart
5101 River Road #1418
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As Westbard-area residents, we support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Respectfully,
Richard and Marina Stinson
5806 Augusta Lane
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I STRONGLY support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground — every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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Regards,
Isabel Stromsem
5501 Mohican Road
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site. The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery.

5. With more storage, there will be more customers, add to the already congested roads in that area.

Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,

Shaheda Sultan
5219 Sangamore Rd
Bethesda, MD 20816

Sent from my iPhone
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Our community has been under siege from planners and developers for the past three years. Let’s work to get this Self-Storage Facility "right" for the community.

Regards,
Joanne Tanner

5606 Ogden Rd.
Bethesda, MD 20816
Dear Mr. McKone and Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,
Joanne Tanner

5606 Ogden Rd.
Bethesda, MD 20816
Dear Mr. Elza Hisel-McCoy and Planning Staff:

Please create a substantial (and I mean kind of like Little Falls Park now) park and day lighting of Willett that runs all the way back through Westbard and that strip on the river. That would really change the area to have a park that stretched and stretched all the way through it.

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Regards,
Judith Travis
5206 Worthington Dr.
Dear Mr. Elza Hisel-McCoy and Planning Staff:

As a Westbard-area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self-Storage Facility, namely:

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Thank you,

Howard Weiss
6003 Corbin RD
Bethesda, MD 20816
Dear Mr. Elza Hisel McCoy and Planning Staff:
As a Westbard area resident, I support the LFWA Letter, dated November 14, 2017, about the referenced Westbard Self Storage Facility, namely:

1. The Building is too Big. The storage facility plans a building which is 70 feet high and 40 feet underground—every buildable inch is dedicated to this building. This towering building will not enhance or promote a naturalized Willett Greenway Park; rather, this proposed building is a concrete behemoth which will affect the success of the park.

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4. The Eventual Beautification and Memorialization of the Existing Cemetery Site is at Risk. Please consider the effect of this over-sized building on the historic Moses African Cemetery which lies directly across the Willett from the planned storage site.

The current plans for the proposed Westbard Self-Storage facility will not enhance the reverence due the Moses African Cemetery. Our community has been under siege from planners and developers for the past three years. Let's work to get this Self-Storage Facility "right" for the community.
As a resident in a River Road neighborhood, I oppose the current development plans for Westbard Self-Storage. I wish to echo the criticisms offered by our local environmental group, the Little Falls Watershed Alliance, about those plans. Specifically, the proposed building is too large. The envisioned facility is enormous -- 70 feet high -- and this dominating building is not consistent with a a naturalized Willett Greenway Park. Additionally, the public's access to the park is too limited and narrow to promote its use by community members. Finally, allowing this enormous construction project to go forward threatens further harm to the existing, historic Moses African Cemetery which lies directly across the Willett from the planned site. For these reasons, I urge the County's planners to disapprove the current plans.

Best regards,
Brian Wong
December 2, 2017

By Email
Elza Hisel-McCoy
Master Planner, Regulatory Supervisor, Area One
MNCPPC
8787 Georgia Avenue
Silver Spring, Maryland 20910

Re:  Preliminary Plan No. 120170280
      Site Plan No. 820170110
      Westbard Self Storage ("Westbard")
      Responding to the Little Falls Watershed Alliance's ("LFWA") November 14, 2017
      Letter and their attachment, "Stormwater Related Comments – Proposed Westbard Self Storage Facility" by GreenGrowth LLC ("GreenGrowth")

Dear Mr. Hisel-McCoy:

We are responding to the November 14, 2017 LFWA letter and attachment. The President Patricia Kolesar of SaveWestbard, Inc. of Bethesda, Maryland forwarded them to us. Below, we list the LFWA's comments and the GreenGrowth report. We then provide our responses which include those of the developer's engineers, whose names and credentials are shown on the last page.

LFWA Comment:

The Little Falls Watershed Alliance (LFWA) is an environmental stewardship group for the Little Falls watershed. We have over 2,000 members, and since our founding in 2008 have worked with thousands of volunteers addressing environmental issues in the watershed. Our mission is to protect the fragile natural environment in lower Montgomery County and adjacent DC neighborhoods and to ensure that the natural spaces in our area persist for generations to come. We have been very concerned with the design and construction of the Westbard Self Storage Facility, as it not only is in our watershed, but it is the first building to be redeveloped that abuts the proposed Willett Branch Park. The restoration of the Willett Branch and formation of the new greenway park is the central amenity of the Westbard Sector plan. It is a tremendous vision for the area. When it is realized, it will be a centerpiece for the Montgomery Parks system and a huge benefit not only to the residents of the area, but to the whole county. With its location off the very popular Capital Crescent Trail, hundreds of people will use it to enjoy the stream and the beauty of the natural area. It will provide the only meaningful green space for the sector. Because the Westbard Self Storage facility is located in the heart of the proposed park, careful attention must be paid to how the parcel is developed to ensure the success of the park.
We have had frequent meetings with the planning staff on the plans for the Westbard Self Storage site and are very pleased that the building has been moved out of the stream buffer. We are also pleased to see the dedication of parcel 177. This parcel, on the banks of the Willett Branch, is the first dedication for the new park!

However, we still have the following concerns:

**Westbard Response:**

We acknowledge the above comments and we thank LFWA for their support for the dedication of Parcel 177.

**LFWA Comment:**

- **Stormwater Management Concept Must Include Infiltration Techniques:**
  
The storage facility abuts the Willett Branch. At this time, the stream is totally contained in a trapezoidal concrete channel. However, the Sector Plan calls for naturalizing the stream and connecting it with the ground water as part of the formation of the Willett Branch Park. This makes recharging the ground water in this area of paramount importance.

The Westbard Storage Facility Stormwater Management Concept depends entirely on green roof and other non-infiltration techniques. While a green roof does provide heating and cooling benefits, from a water quality perspective, a green roof is not satisfactory as it does not provide groundwater recharge. Without infiltration, the site will not function as "woods in good condition", a goal of the County’s stormwater management plan. The Maryland Stormwater Management Act of 2007 mandates that stormwater standards must be applied to best mimic pre-developed conditions. Infiltration is critical to achieving this goal.

The developer has stated that the constraints of the property and soil type have made it impossible to implement in-ground Environmental Site Design. LFWA engaged Diane Cameron, GreenGrowth LLC, to review the stormwater plan, and she has identified several areas where the developer can employ techniques that will allow the rain water to soak into the ground, including using pervious pavement, infiltration buffers and dry wells. Ms. Cameron also suggests that the developer consider soil augmentation and infiltration trench/basins. We have attached her review of the plans. We request that the developer be required to revisit the SMC and seriously explore her suggestions before submitting the final stormwater management plan for approval.

We are further concerned that the engineering study and recommendations for the site are based on a building that has a 10-foot cellar, not 40 feet of underground area. There needs to be more clarity on this from the applicant. Can their geotechnical study be adequate if it is based on the assumption of only one lower level, not three or four?

**Westbard Response:**

The storage facility is not located within the Willett Branch stream valley buffer, notwithstanding the Westbard Sector Plan language, repeated on three separate pages, that contemplates such circumstances. The Sector Plan, at pages 57, 75 and 101, includes the following statement:
The Plan recognizes that Willett Branch will be an urban stream and will have engineered elements. The intent of the recommendations for an improved Willett Branch is to create attractive and accessible green spaces that provide interconnectivity with urban green infrastructure and that improve stream ecology. The improvements to Willett Branch need to balance and complement the goals of improving stream quality, while also allowing recommended redevelopment to proceed. Accordingly, at the time of regulatory review, stream buffer areas may be modified and/or reduced if necessary to achieve the balance described above.

The storage building is located entirely outside of the stream valley buffer.

It should not be ignored that the Applicant is providing a significant land area adjacent to the Willett Branch Stream for use as a park that provides pervious buffer between stream and development. The Applicant is dedicating all of its residentially zoned land to MNCPPC Parks. The land area equals 0.390 acres or 18,974SF. Today, the land is mainly grass and trees and thus are similar to, if not perfectly, "woods in good condition." MNCPPC Parks may further return the land to natural conditions for the future Greenway. Later in this letter, we provide an engineering based response to the GreenGrowth recommendation about "further study and consideration of the potential for infiltration is recommended." Finally, it is worth noting preliminarily that the stormwater management plan includes an 8" thick green roof and micro-bio retention planter boxes and fully addresses Montgomery County Environmental Site Design requirements per Water Resources Technical Policy-5 (WRTP-5). Thus, later in this letter, there is an engineering discussion specifically addressing GreenGrowth's recommendations.

The self storage building is lawfully designed. The proposed building has four levels below grade, and five levels above grade. Montgomery County and other agencies conduct an extensive review and approval process for the construction of buildings, involving many engineering and architectural disciplines, including geotechnical.

LFWA Comment:

The Building is Too Big for the Site:
We believe a fundamental problem with the plan is that the proposed building is too large for the site. The developer is constructing a building with almost double the usable space permitted by the FAR by going many levels below ground. While this additional cellar space may not be considered part of the FAR as it is traditionally deemed "unusable," in the case of a storage facility, it is, in fact, very usable space. With the usable space extending so far beyond the zoning code's contemplation, we feel that the building footprint should be further reduced in order to allow for allow for infiltration of environmental site design stormwater treatment that is so necessary for the health of the new Willett Branch Park as discussed
above. Reducing the footprint will also allow more amenity open space on the parcel and greater setbacks to avoid shadow on the park areas, as well as a wider path into the park from River Road.

**Westbard Response:**

The building meets or exceeds the applicable development standards. We are not aware of any unstated intent or "traditional" interpretation or "contemplation" of the County's laws. The construction of space below grade does not affect the building's footprint. The building is fully compliant with the law. As for infiltration, we refer you to our earlier explanation concerning the Applicant's dedication of all of its residentially zoned land to MNCPPC Parks. The land area equals 0.390 acres or 18,974SF.

**LFWA Comment:**

- **Access to Park is Not Welcoming:**

The proposed 18 or 20-foot pathway to the park is too small to be more than a narrow driveway. With the 70-foot wall on one side and a 20-foot retaining wall on the other, visitors will not be welcomed into the park, but rather have to pass through a dark alleyway to get there. We think at least a 24-foot path would be more appropriate. Further, stepping back the building would allow for more light in this area. The entrance to the park should comply with p. 51 of the Sector Plan, which calls for "safe and inviting pedestrian routes across the Willett Branch for people who want to walk from Westbard Avenue to River Road."

**Westbard Response:**

The pathway to the park will be a safe and inviting pedestrian and bicycle throughway as well as a place for learning and reflection, and will equal or exceed the ambiance of many stretches of the existing Capital Crescent Trail. The pathway to the park will be at least 20 feet wide. The pathway will be illuminated. The height of the retaining wall and the height of the storage facility façade vary from one end to the other. It will include benches and landscaping. The pathway will include display cases where the history of the Westbard area and other matters of community interest will be programmed to be displayed. Along the storage facility's west façade, near the edge of the Greenway stream valley buffer, the pathway will connect to a north/south green area that will also be available to the public.

**LFWA Comment:**

**Interface with Park at Rear of Property is Unattractive:**

One of the concerns that has been raised continually throughout the redevelopment process is the need for an attractive interface with the park: buildings should embrace the park rather than turn their backs to it. We understand this to be a challenge with a self-storage facility, but this building makes no effort to embrace the park with anything but a 70-foot wall. The rear of the building is especially unattractive, and given the great height, will cast a shadow over the new park. We would like to see the rear of the building stepped back with green roofs on each level and liberal use of green screens. It would make a beautiful transition to
the park and a very attractive self-storage facility. Landscaping for the rear seems to be limited to grass. We hope that the developer will work with Parks and the Department of Environmental Protection to install native plantings appropriate to the building’s stream-side location.

Westbard Response:

Westbard redesigned its facades in response to comments about activating and articulating the building facades and interfacing with the Greenway throughout the course of the application process. The most recent facades show the results of such redesigns. With respect to the west façade that will face the future Greenway, the façade includes a large area where MNCPPC Parks will have the opportunity to provide art in the form and according to the Parks programming, which among other features, not limited to the pathway and the green area along the west façade. Westbard is dedicating to MNCPPC Parks for the Greenway a land area equal to 0.390 acres or 18,974SF. The combination of all of the above steps constitutes a significant embrace with the Greenway.

Westbard's green roof is significantly greater than what would otherwise be required. Part of the facilities on the roof allow Westbard to shrink its building footprint so as to locate the building outside of the stream valley buffer. Westbard's landscaping plan was modified to respond to MNCPPC review comments and suggestion and thus satisfies the MNCPPC.

Westbard Responses to the Report By GreenGrowth LLC

Westbard acknowledges report paragraphs 1 and 2.

GreenGrowth Report:

3. Site Description and Proposed project and stormwater management plan description
Westbard Self Storage has applied to build a 1.37-acre facility at 5204 River Road in Bethesda Maryland; this is the southwest corner of River Road and the Capitol Crescent Trail. The proposed storage facility would have a total of 23,500 square feet. The submitted architectural drawings available on the Montgomery County Planning Department website indicate a total of three below-grade levels and five levels above-grade.

The site is located adjacent to the Willett Branch stream and its stream valley buffer. Willett Branch is currently a concrete trapezoidal channel, with steep slopes above it overrun with invasive plants. During a visit to the site on 11/13/2017, there was water running in the Willett Branch channel during dry weather, but since this was within 12 hours of a moderate overnight storm, it is reasonable to expect that Willett Branch has little baseflow on dry-weather days that are more than 48 hours after a rainstorm. Thus, providing groundwater-fed baseflow to Willett Branch, including through stormwater plans for redevelopment projects bordering the stream, is a positive goal in support of the Westbard Sector Plan’s vision of a restored Willett Branch.

According to this project’s proposed Stormwater Management Plan, authored by Bohler Engineering, The site consists of an existing radio tower and car repair shops. This project proposes to redevelop the site to incorporate a new self-storage building, asphalt trail and parking area.

Bohler Engineering and Wetlands Studies and Solutions have submitted documents to Montgomery
County Department of Permitting Services on behalf of the applicant. The applicant is proposing to raze the existing car repair business and build a 0.9-acre storage facility. Proposed stormwater plan consists of an 8" green roof and two micro-bioretention units.

**Westbard Response:**

The storage facility will be developed on the IM zoned land which is a land area of 0.983 acres. The land area is zoned IM 2.5, H-50. The Zoning Code allows up to 107,030SF of FAR. The application proposes up to 107,030SF of gross floor area and 88,497SF of below grade/cell space that is exempt from FAR limitations. Thus, the total above grade and below grade square footage will be up to 195,527 SF. The applicant is proposing four levels below grade and five levels above grade.

Westbard is dedicating 0.39 acres to MNCPPC Parks for the Greenway. Westbard is providing a pathway that will lead to the Greenway. Westbard is providing for the public's use a green area along its west façade near the edge of the Greenway's stream valley buffer.

As required, the stormwater management plan includes relevant off site land areas that Westbard is not developing. Westbard is not developing the land associated with the radio tower nor other off site businesses.

The Montgomery County Department of Permitting Services approved the stormwater management concept plan that includes among other features, an 8" green roof and two micro-bioretention units, all of which are located on the roof to reduce the building footprint and to keep stormwater management practices out of the stream valley buffer.

**GreenGrowth Report:**

4. Brief critique of the proposed SWM Plan

The project with its micro-bioretention planter boxes and approximately 12,345 square feet of an 8" thick green roof to treat stormwater runoff, is overall a strong plan to meet and slightly exceed volume requirements. These are positive elements that LFWA can support. The question is, is this approach adequate to enable the proposed project to contribute to the restoration of the adjacent Willett Branch? The preliminary answer is that while its thick green roof would indeed contribute to stormwater treatment, it would not contribute groundwater infiltration that could replenish the stream’s base flow during dry weather. Further study and consideration of the potential for infiltration is recommended.

The stormwater management plan for this project rules out infiltration techniques based on presence of urban fill HSG "D" Soils. The Geotechnical report provides data on the textural composition of soil and subsoil from five borings; it indicates the presence of a wide range of textural types including sandy lean clay, silt, and weathered bedrock, all of which may permit some infiltration.
In my opinion, further study should be done on the existing soils and subsoils on the site, including a soil chemical analysis for legacy contaminants. In addition, the potential for soil restoration techniques to restore permeability should be explored. Depending upon further information and analysis, it's possible that this site would permit a carefully-designed infiltration system, and such system would benefit Willett Branch and its adjacent Stream Buffer by providing groundwater-fed baseflow. In addition, the information from this further study would contribute to a refinement of the Willett Branch restoration plan approach for other redevelopment sites in the Willett Branch watershed.

The table below provides a comparison of the stormwater techniques considered for this project with a focus on techniques that contribute to infiltration.

**Westbard Response:**

Westbard acknowledges the report's statement, "The project with its micro-bioretention planter boxes and approximately 12,345 square feet of an 8" thick green roof to treat stormwater runoff, is overall a strong plan to meet and slightly exceed volume requirements. These are positive elements that LFWA can support."

The report does not account for the groundwater infiltration that will be provided from the contribution through Westbard's dedication of 0.39 acres to MNCPPC Parks for the Greenway and the green area along its west façade near the edge of the Greenway's stream valley buffer, both of which land areas will provide pervious area and act as a buffer for the Willett Branch Stream.

With respect to the area to be developed for the storage facility, based on the judgment of the engineers, Westbard is not proposing infiltration on such land. In light of the soils analysis, and in light of the infiltration contributions of the other areas, i.e., the Greenway and the green area along the west facade, the reconsideration of installing an infiltration system on the area to be developed is not feasible. Infiltration practices were considered in initial design but due to concerns noted in the report, in addition to the USDA Class ‘D’ soils present on site, using infiltration practices poses the potential for mobilizing contaminants. The site constraints made the implementation of infiltration practices not possible due to MNCPPC preference to keep the building and stormwater practices outside of the stream valley buffer. Following careful study and coordination with Montgomery County Department of Permitting Services Water Resources Division it was determined the best option to comply with stormwater management requirements was to provide the stormwater practices on the building which includes the use of 8” intensive green roof and micro-bioretention planter boxes which in turn provides environmental site design to the maximum extent practicable.

**GreenGrowth Report:**

5. Potential role of infiltration at this site and some caveats and pre-requisites.

This site presents the possibility of infiltration as a stormwater treatment train step, after the runoff is treated by the green roof and micro-bioretention boxes. Depending upon the results of further study, infiltration could be a viable option through one or more techniques, including those that were
considered but ruled out by the applicant, and potentially other practices, such as soil restoration, that were not yet considered.

Pre-requisites to use of infiltration at industrial redevelopment sites include soil testing for toxic chemicals; the existing geotechnical report focused on soil and groundwater conditions and textural characterization for the purpose of supporting the proposed construction project; it did not report on any soil or groundwater chemistry tests for contaminants that may be present due to present or past activities on this site. Appropriate site characterization that rules out the presence of legacy contaminants, is a pre-requisite to selection of infiltration practices at an urban redevelopment site.

Caveats about urban fill soils and infiltration warrant caution.

Infiltration at industrial sites and "D" fill soils is often ruled out in an abundance of designer caution. For instance, one guidance document states, "Sites that have been previously graded or disturbed do not retain their original soil permeability due to compaction. Therefore, such sites are not good candidates for infiltration practices. In addition, infiltration practices should never be situated above fill soils." In addition to the "D Soil compaction" concern, the other major concern for urban project managers contemplating use of infiltration is the potential it poses for mobilizing legacy contaminants. In conjunction with the applicant's proposed 8" green roof and microbioretention units, this runoff would be well-treated before being infiltrated. Finally, the potential for migration of infiltrated water to impact the underground level of the proposed storage facility, while not obvious from looking at the site’s slope downward toward Willett Branch, is still possible and should be ruled out through careful analysis. Although all three of these issues – toxics; compaction; and groundwater migration are significant enough at any urban redevelopment site, and especially industrial sites, to warrant further in-depth investigation, the benefits of infiltration warrant further study, not categorical elimination. (An example of an urban stormwater infiltration guidance presentation is available at http://chesapeakestormwater.net/wp-content/uploads/downloads/2012/06/Ultraurban-Stormwater-Design.pdf).

Westbard Response:

Please see the above response.

Thank you for your consideration.

Very truly yours,

Timothy Dugan

cc:
Mr. Bradford Fox, P.E., LEED AP, Bohler Engineering
Mr. Kenneth R. Wallis, PWS, Wetland Studies and Solutions, Inc.
Ms. Bethany Rodgers, Bethesda Magazine
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