






Grosvenor-Strathmore WMATA Garage Expansion, Amended Final Forest Conservation Plan No. MR2000201

-  Steve Findley, Planner Coordinator, Area 2 Division, [steve.findley@montgomeryplanning.org](mailto:steve.findley@montgomeryplanning.org), 301-495-4727
-  Patrick Butler, Regulatory Supervisor, Area 2 Division, [patrick.butler@montgomeryplanning.org](mailto:patrick.butler@montgomeryplanning.org), 301-495-4561
-  Carrie Sanders, Chief, Area 2 Division, [carrie.sanders@montgomeryplanning.org](mailto:carrie.sanders@montgomeryplanning.org), 301.495.4653

Completed: 7/5/2018

## Description

Amend Final Forest Conservation Plan (FFCP) MR2000201 to reflect replacing the existing surface parking lot at the Grosvenor-Strathmore Metro Station with an expansion to the existing 6-story structured garage, reconfigure the Arts Walk and Kiss & Ride, and bring the FFCP into compliance with previous approvals.

Location: Grosvenor-Strathmore Metro Station, 10300 Rockville Pike, North Bethesda, MD.

Master Plan: 2018 *Grosvenor-Strathmore Metro Area Minor Master Plan*.

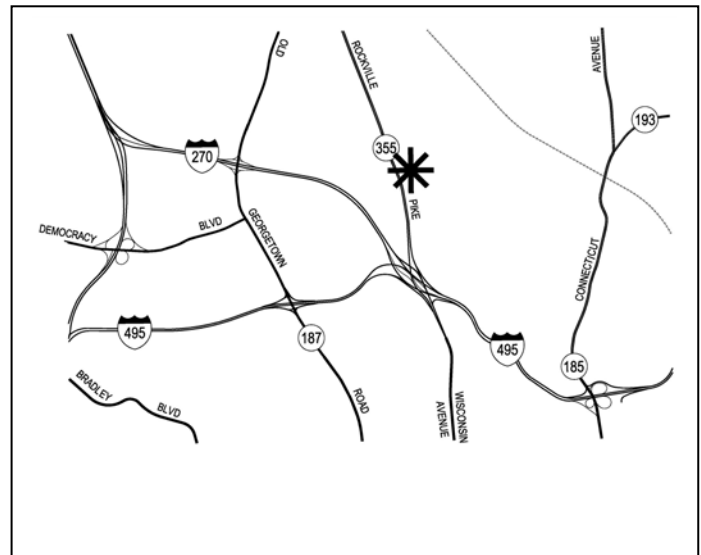
Zone: CR 3.0, C-0.5, R-2.75, H-300.

Property Size: 14.58 acres.

Applicant: Washington Metropolitan Area Transit Authority (WMATA).

Application Accepted: May 9, 2018.

Review Basis: Chapter 22A, Forest Conservation Law.



## Summary

- Staff recommends approval with conditions.
- This plan amends Final Forest Conservation Plan MR2000201, as part of MR2018026 for the expansion of the Grosvenor-Strathmore WMATA garage by adding the existing concrete steps from the garage east to Tuckerman Lane and extending the footprint of the garage to the south and west to replace the existing surface parking lot.
- There is an associated variance request for the removal of four specimen trees and impacts to three additional specimen trees resulting from the garage expansion.
- No correspondence has been received on this application.
- The Planning Board action on the Mandatory Referral is advisory, but the Board decision on the related Forest Conservation Plan is regulatory and binding.

## **RECOMMENDATION AND CONDITIONS**

Pursuant to Chapter 22A of the County Code, the Board's actions on Forest Conservation Plans are regulatory and binding. Staff recommends approval of the Final Forest Conservation Plan, subject to the following conditions:

1. The proposed development shall comply with all of the conditions of the Final Forest Conservation Plan as amended. All conditions shall be met prior to the issuance of sediment and erosion control permits by the Montgomery County Department of Permitting Services.
2. Prior to release of permits for clearing and grading, documentation must be provided demonstrating that the requirement for an additional 1.40 acres of afforestation/reforestation has been fulfilled, along with payment of a fee-in-lieu for an additional 0.26 acres of reforestation.
3. Any future plan that shows removal of the approved, but unrecorded, Category I Conservation Easement must replace this forest with 3.28 acres of off-site forest planting, plus an additional 0.10 acres to provide 2:1 replacement for the forest previously removed, for a total of 3.38 acres of off-site forest planting, or 6.76 acres of existing forest preserved, in an approved off-site forest conservation bank.
4. Limits of disturbance shown on the Sediment Control Plan must match the limits of disturbance shown on the Amended Final Forest Conservation Plan.
5. Site inspections must be performed by M-NCPPC inspectors as specified in the "Trees Technical Manual."

## **PROJECT DESCRIPTION AND BACKGROUND**

### **Project Description**

The Final Forest Conservation Plan (FFCP) for the 14.58-acre property (Property – outlined in red in Figure 1) is located in North Bethesda, Montgomery County, Maryland along Tuckerman Lane, approximately 200 feet east of Rockville Pike. It is currently developed with the 6-story WMATA garage, bus loop and facilities, Kiss & Ride parking facilities, and a 408-space surface parking lot. It is generally bounded by Tuckerman Lane to the east and north, residential uses to the east/south, and Metro tracks to the west. The proposed WMATA project will consist of a southern and western expansion of the existing parking garage, removal of the surface parking lot, addition of a bike station, redesign of the Arts Walk, and reconfiguration of the Kiss & Ride facilities.



**Figure 1: Site and Vicinity (Property outlined in red)**

### **Background**

The original FFCP that accompanied the Mandatory Referral for construction of the Grosvenor-Strathmore WMATA Garage (MR2000201) was approved on May 20, 2002. The Net Tract Area for the project was 14.50 acres. The Property originally contained 2.47 acres of forest. The approved FFCP allowed clearing of 0.73 acres of forest, and 1.74 acres retained, with the retained forest to be placed in a Category I Easement recorded in the County land records. The mitigation requirement was for 1.46 acres of forest planting, to be fulfilled by .06 acres of on-site tree canopy planting and 1.40 acres of off-site forest banking.

### **ANALYSIS**

#### **Forest Conservation**

In preparation for the garage expansion, Staff has learned that some of the original FFCP conditions of approval have not been fulfilled. Specifically, a Category I Easement was never recorded over the retained forest on the Property, and there is no record that the 1.40 acres of off-site forest mitigation was ever recorded. In addition, a stairway was constructed through the area that was to be preserved in the Category I Easement. The stairway removed 0.10 acres of forest from the easement area on the eastern side of the Property between the garage and Tuckerman Lane.

The FFCP Amendment filed with Mandatory Referral MR2018026 for the Grosvenor-Strathmore WMATA Garage Expansion (Attachment 1) increases the Net Tract Area to 14.60 acres and reflects the additional 0.10 acres removed when the stairway was constructed. It also removes the credit for 0.06 acres of on-site tree canopy planting. These changes increase the total mitigation requirement to 1.66 acres of forest planting (or 3.32 acres of forest preservation).

A letter in the FFCP file shows that Montgomery County Department of Public Works and Transportation committed to providing the 1.40 acres of reforestation required under the original FFCP approval. Documentation that this requirement has been fulfilled must be provided, along with payment of a fee-in-lieu for the additional 0.26 acres of reforestation, prior to release of permits for clearing and grading.

#### Forest Conservation Easement

Because the original FFCP approval included a condition that the areas of retention must be placed in a Category I Conservation Easement, the area designated for retention on the approved FFCP is treated as if the easement had been recorded. This means that removal of the easement must be replaced at a ratio of at least 2 acres replaced for every acre removed. Ordinarily, Staff would require that the FFCP amendment now recommended for approval would include a condition to record the easement in order to bring the amended FFCP into full compliance with the original conditions of approval. In this case, Staff recognizes that Approved and Adopted *Grosvenor-Strathmore Metro Area Minor Master Plan* recommends this area for development in the future, and that recording the easement at this time would be a waste of time and resources.

During the Master Plan process, Staff made it known to the future developer of the Property, that the retained forest area is considered a Category I Conservation Easement, and that any future development that showed removal of the forest would have to replace the forest at a 2:1 ratio. The FFCP Amendment for this Mandatory Referral provides an additional 0.10 acres of mitigation for forest removed within the easement area for past construction of the stairway. This reduces the retained forest area to 1.64 acres. Therefore, any future plan submission that shows removal of this area must replace this forest with 3.28 acres of off-site forest planting, plus an additional 0.10 acres to provide 2:1 replacement for the forest previously removed, for a total of 3.38 acres of off-site forest planting, or 6.76 acres of existing forest preserved, in an approved off-site forest conservation bank.

#### Forest Conservation Variance

Section 22A-12(b) (3) of County code identifies certain individual trees as high priority for retention and protection. Any impact to these trees, including removal of the subject tree or disturbance within the tree's critical root zone (CRZ) requires a variance. An applicant for a variance must provide certain written information in support of the required findings in accordance with Section 22A-21 of the Forest Conservation Law. The law requires a variance to impact trees that: measure 30 inches or greater, dbh; are part of an historic site or designated with an historic structure; are designated as a national, State, or County champion tree; are at least 75 percent of the diameter of the current State champion tree of that species; or trees, shrubs, or plants that are designated as Federal or State rare, threatened, or endangered species.

#### Variance Request

The Applicant submitted a variance request on May 8, 2018, because the plan would create an impact to the CRZ of seven trees that are considered high priority for retention under Section 22A-12(b) of the County code. Four of these trees are to be removed; the other three are to be saved. A copy of the variance request letter, specifying the amount of critical root zone disturbance for each impacted tree, is appended to this letter (Attachment 2).

### Unwarranted Hardship for Variance Tree Impacts

Per Section 22A-21, a variance may only be granted if the Planning Board finds that leaving the requested trees in an undisturbed state will result in an unwarranted hardship. Quoting from the Variance application letter, "The proposed improvements are necessary to implement the larger-scale, future redevelopment recommended for the Property in the [2018] Approved and Adopted Grosvenor Strathmore Metro Area Minor Master Plan... Given the urban and transit-oriented nature of the Property, the currently proposed infrastructure improvements (e.g. expansion to the existing garage, reconfiguration of the Kiss and Ride parking facilities, addition of a bike share station, renovation of the existing Artswalk, a pedestrian corridor that connects the site to the Music Center at Strathmore, and associated upgrades), which are necessary to implement the mixed-use, pedestrian friendly, transit-oriented development recommended in the Master Plan, simply cannot be accommodated if the Subject Trees could not be removed." Staff agrees that not permitting impacts to the CRZ of the variance trees would create an unwarranted hardship for redevelopment of the Property.

### Variance Findings

Per Section 22A-21 and based on review of the variance request and the proposed FFCP, Staff finds the requested variance:

1. *Will not confer on the applicant a special privilege that would be denied to other applicants.*

The Property is already developed, and redevelopment is being confined to the existing development envelope. The trees being impacted are in or along the edges of the existing development, by sidewalks, access roads, and in traffic islands in the parking lot. The site constraints are numerous and substantial. Staff has determined that the impacts to the trees subject to the variance requirement cannot be avoided. Therefore, staff finds that the granting of this variance is not a special privilege that would be denied to other applicants.

2. *Is not based on conditions or circumstances which are the result of the actions by the applicant.*

The requested variance is not based on conditions or circumstances which are the result of actions by the Applicant, but on engineering and site constraints, and on the compact, transit-oriented development recommended by the Master Plan.

3. *Is not based on a condition relating to land or building use, either permitted or non-conforming, on a neighboring property.*

The requested variance is not a result of land or building use on a neighboring property.

4. *Will not violate State water quality standards or cause measurable degradation in water quality.*

Three of the impacted trees are being retained and will continue to perform water quality functions as before. The four trees that are being removed are being replaced according to a formula that requires one caliper-inch of replacement trees planted for every four inches diameter removed, using planting stock of no less than 3 inches caliper. This project will remove 134 diameter inches of specimen trees, which will be mitigated by planting one four-inch caliper tree and 10 three-inch caliper trees, for a total of 34 caliper-inches of new trees planted. It is assumed that the canopy produced by these trees will replace the canopy from the removed trees within a few years, thereby restoring the water quality functions formerly performed by

the trees removed. Therefore, the project will not violate State water quality standards or cause a measurable degradation in water quality.

County Arborist's Recommendation on the Variance

In accordance with Montgomery County Code Section 22A-21(c), on June 18, 2018 the Planning Department referred a copy of the variance request to the County Arborist in the Montgomery County Department of Environmental Protection for a recommendation prior to acting on the request.

Variance Recommendation

Staff recommends that the variance be granted.

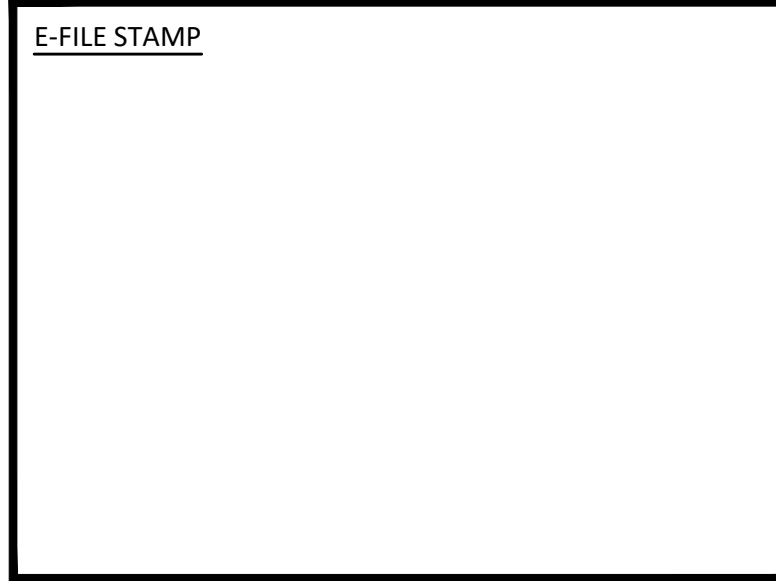
**CONCLUSION**

Staff concludes that the proposed FFCP meets the requirements of Chapter 22A Forest Conservation Law. Staff, therefore, recommends that the Planning Board approve the FFCP and associated variance, with the conditions above.

Attachments:

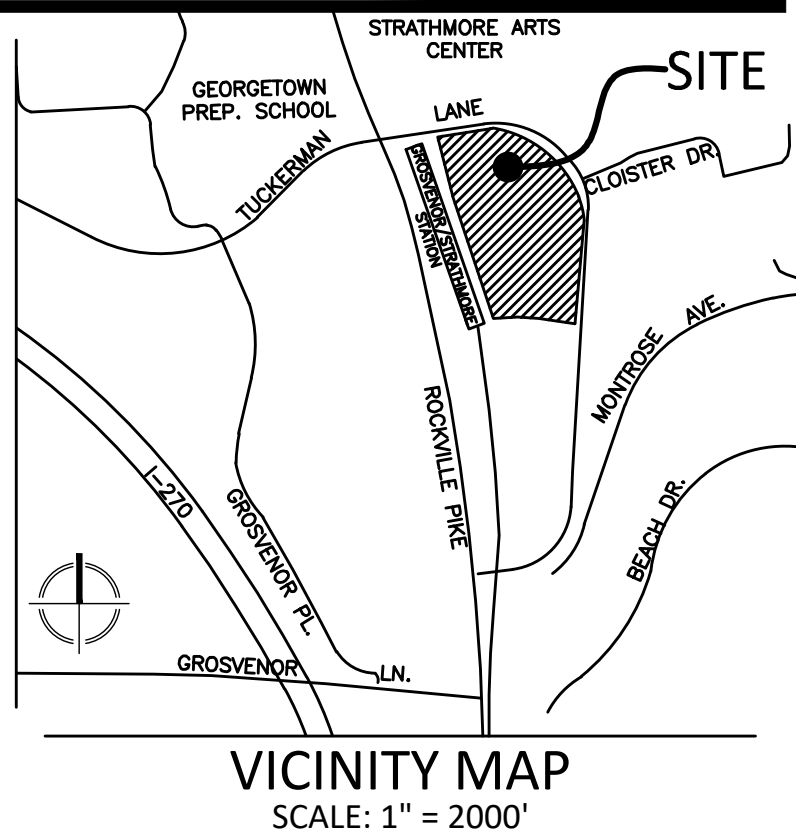
1. Amended Final Forest Conservation Plan
2. Variance Request





# GROSVENOR-STRATHMORE WMATA GARAGE EXPANSION

## MANDATORY REFERRAL FINAL FOREST CONSERVATION PLAN AMENDMENT



ENGINEERS PLANNERS  
LANDSCAPE ARCHITECTS SURVEYORS  
VIKA MARYLAND, LLC  
20251 CENTURY BOULEVARD SUITE 400  
GERMANTOWN, MARYLAND 20874  
PHONE: 301.916.4100  
FAX: 301.916.2262  
GERMANTOWN, MD TYSONS, VA

PREPARED FOR:  
**FIVESQUARES**  
**DEVELOPMENT @**  
**GROSVENOR METRO, LLC**  
1 THOMAS CIRCLE, NW  
SUITE 200  
WASHINGTON, DC, 20005  
202-640-4445  
SYLKE KNUPEL, PE

DESIGN CONSULTANTS  
ARCHITECT  
**PERKINS EASTMAN DC**  
1 THOMAS CIRCLE, NW  
SUITE 270  
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MATT BELL

LANDSCAPE ARCHITECT  
**VIKA MARYLAND, LLC**  
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JOSH SLOAN

ATTORNEY  
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STEVE ROBINS

TRAFFIC ENGINEER  
**WELLS + ASSOCIATES**  
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SUITE 610  
TYSONS, VA 22102  
703.917.6620  
CHRIS TURNBULL

PLANNING, CIVIL ENGINEERING  
**VIKA MARYLAND, LLC**  
20251 CENTURY BOULEVARD  
SUITE 400  
GERMANTOWN, MD 20874  
301.916.4100  
LAURENT MOUNAUD, PE

REVISIONS	DATE
1 INITIAL SUBMISSION	4/25/2018
2 SECOND SUBMISSION	6/11/2018

PROFESSIONAL SEAL

I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A FULLY LICENSED REGISTERED LANDSCAPE ARCHITECT UNDER THE LAWS OF THE STATE OF MARYLAND.  
NAME: DOUGLAS KOEHL, RIA  
LICENSE NUMBER: 3861  
EXPIRATION DATE: JANUARY 24, 2020

**GROSVENOR - STRATHMORE**  
**WMATA GARAGE EXPANSION**  
4TH ELECTION DISTRICT  
MONTGOMERY COUNTY, MARYLAND  
WSSC GRID: 213NW05  
TAX MAP: HP123

### COVER

DRAWN BY: DLK  
DESIGNED BY: DLK  
DATE ISSUED: 04/25/2018  
VIKA PROJECT: VM50226A  
APPLICATION NO. \_\_\_\_\_

SHEET NO. **FFCP 100**

### GENERAL NOTES

- THE GROSS TRACT AREA IS 14.58 ACRES.
- THE NET FCP TRACT AREA IS 14.58 ACRES.
- THE SITE IS LOCATED ON WSSC MAP 213NW05 .
- THE SITE IS LOCATED ON TAX MAP HP123.
- THE SUBJECT PROPERTY COMPRISES THE FOLLOWING:  

LOT /PARCEL	BLOCK	TAX ACCT NO.	LIBER& FOLIO	PLAT NO.
P428	-	00055028	L. 8947, F. 593	--
- THE SUBJECT PROPERTY IS ZONED R-60 AND PROPOSED AS CR 3.0, C-0.5, R-2.75, H-300'
- THE HORIZONTAL DATA IS BASED ON NAD 83 MARYLAND COORDINATE SYSTEM. THE VERTICAL DATUM IS BASED ON NGVD29 DATUM.
- SURVEY WAS PERFORMED BY VIKA MARYLAND, LLC, JANUARY 2018.
- FCP MR-00201 FOR THE SUBJECT PROPERTY WAS APPROVED 05/02/2002.
- THE SUBJECT PROPERTY DRAINS TO LOWER ROCK CREEK, WHICH FLOWS INTO ROCK CREEK, A USE CLASS I STREAM, AND EVENTUALLY INTO THE POTOMAC RIVER. THE SUBJECT PROPERTY ALSO DRAINS TO LUXMANOR BRANCH, WHICH DRAINS TO LOWER ROCK CREEK, WHICH FLOWS INTO ROCK CREEK, A USE CLASS I STREAM, AND EVENTUALLY INTO THE POTOMAC RIVER.
- THIS SITE IS NOT WITHIN AN SPA OR PMA.
- AS PER APPROVED FCP MR-00201, THERE ARE NO PERENNIAL OR INTERMITTENT STREAMS OR THEIR ASSOCIATED BUFFERS LOCATED ON THE SUBJECT PROPERTY.
- AS PER APPROVED FCP MR-00201, THERE ARE NO WETLANDS OR THEIR ASSOCIATED BUFFERS LOCATED ON THE SUBJECT PROPERTY OR WITHIN THE REMAINDER OF THE NRI STUDY AREA.
- THE SUBJECT PROPERTY IS LOCATED IN ZONE "X" (AREA OF 0.2% ANNUAL CHANCE OF FLOOD) AS SHOWN ON FLOOD INSURANCE RATE MAP (FIRM) COMMUNITY PANEL NO. 24031C03650, FOR MONTGOMERY COUNTY, MARYLAND, DATED SEPTEMBER 29, 2006.
- AS PER APPROVED FCP MR-00201, THE WILDLIFE AND HERITAGE DIVISION OF THE MD DNR STATED THAT THERE ARE NO FEDERAL OR STATE RECORDS OF RARE, THREATENED OR ENDANGERED SPECIES ON THE SUBJECT PROPERTY OR WITHIN THE NRI STUDY AREA. NO RARE, THREATENED OR ENDANGERED SPECIES WERE NOTED DURING THE FIELD WORK.
- THE SUBJECT PROPERTY IS NOT IDENTIFIED IN THE MONTGOMERY COUNTY HISTORIC PRESERVATION ON-LINE MAPPER (<http://www.montgomeryplanning.org/gis/interactive/historic.shtm>).
- PER APPROVED FCP MR-00201, THERE ARE 2.47 ACRES OF EXISTING FOREST ON THE SUBJECT PROPERTY AS OF MAY 2, 2002.
- SEE THE SIGNIFICANT AND SPECIMEN TREE TABLE AND PLAN FOR LOCATIONS AND INFORMATION ABOUT SIGNIFICANT AND SPECIMEN TREES ON THE SUBJECT PROPERTY.
- THERE ARE NO CHAMPION TREES OR TREES 75% OF THE STATE CHAMPION ON THE SUBJECT PROPERTY OR WITHIN THE REMAINDER OF THE NRI STUDY AREA.
- ALL TREES <24" DBH WITHIN THE LOD ARE TO BE REMOVED. ALL SIGNIFICANT AND SPECIMEN TREES TO BE REMOVED ARE SHOWN WITH AN 'X' AS DETAILED IN THE LEGEND.
- A VARIANCE REQUEST HAS BEEN SUBMITTED WITH THIS PLAN FOR SPECIMEN TREES TO BE IMPACTED OR REMOVED. SEE THE SIGNIFICANT & SPECIMEN TREE TABLE FOR DETAILS. THIS PLAN PROPOSES 34" OF REPLACEMENT NATIVE SHADE TREES AS MITIGATION FOR THE REMOVAL OF SPECIMEN TREES AS PER THE SPECIMEN TREE MITIGATION TABLE SHOWN ON THIS SHEET. SEE THE LANDSCAPE PLAN FOR ALL MITIGATION TREE DETAILS.
- A VARIANCE REQUEST FOR SPECIMEN TREES TO BE IMPACTED OR REMOVED WILL BE SUBMITTED ALONG WITH THIS FCP AMENDMENT MR-00201. THIS PLAN PROPOSES TEN (10) 3" CALIPER NATIVE SHADE TREES AND ONE (1) 4" CALIPER NATIVE TREE AS MITIGATION FOR THE REMOVAL OF SPECIMEN TREES PER THE SPECIMEN TREE MITIGATION TABLE SHOWN ON THIS SHEET. SEE THE LANDSCAPE PLAN FOR ALL MITIGATION TREE DETAILS.

### FCP WORKSHEET (UPDATED)

FOREST CONSERVATION WORKSHEET									
NET TRACT AREA:									
A. Total tract area: (14.58 AC onsite + 0.02 AC offsite) [1]									14.60
B. Land dedication acres (parks, county facility, etc.									0.00
C. Land dedication for roads or utilities (not being constructed by this plan)									0.00
D. Area to remain in commercial agricultural production/use									0.00
E. Other deductions (specify)									0.00
F. Net Tract Area =									14.60
LAND USE CATEGORY: (from Trees Technical Manual)									
Input the number "1" under the appropriate land use, limit to only one									
	ARA	MDR	IDA	HDR	MPD		CIA		
	0	0	1	0	0		0		
G. Afforestation Threshold									
H. Consenation Threshold									
EXISTING FOREST COVER:									
I. Existing forest cover									2.47
J. Area of forest above afforestation threshold =									0.28
K. Area of forest above conservation threshold =									0.00
BREAK EVEN POINT:									
L. Forest retention above threshold with no mitigation =									0.00
M. Clearing permitted without mitigation =									0.00
PROPOSED FOREST CLEARING:									
N. Total area of forest to be cleared =									0.83
O. Total area of forest to be retained =									1.64
PLANTING REQUIREMENTS:									
P. Reforestation for clearing above conservation threshold =									0.00
Q. Reforestation for clearing below conservation threshold =									1.66
R. Credit for retention above conservation threshold =									0.00
S. Total reforestation required =									1.66
T. Total afforestation required =									0.00
U. Credit for landscaping (may not exceed 20% of "S") =									0.00
V. Total reforestation and afforestation required =									1.66
[1] PRIOR NET TRACT AREA APPROVED AT 14.50 ACRES. VIKA ALTA SURVEY ON DEC. 2017 SHOWS PROPERTY BOUNDARY AS 14.58 ACRES.									
[2] PRIOR FOREST CLEARING APPROVED AT 0.73 ACRES. SUBSEQUENT TO APPROVAL, AN ADDITIONAL 0.10 ACRES CLEARED FOR STAIRWAY OFF OF TUCKERMAN LANE.									
[3] PRIOR FOREST RETAINED APPROVED AT 1.74 ACRES.									
[4] PRIOR APPROVAL ACCOUNTED FOR 1.40 ACRES OF REFORESTATION.									

### PROPOSED AFFORESTATION/ REFORESTATION CREDIT TABLE (UPDATED)

	AC
AFFORESTATION/REFORESTATION REQUIRED	1.66
PROPOSED FOREST PLANTING AREA (CATEGORY I EASEMENT)	0.00
PROPOSED OFF-SITE FOREST BANKING	0.00
PROPOSED LANDSCAPE CREDIT	
20 YR. CANOPY CREDIT	0.00
SAVED EXISTING CRITICAL ROOT ZONE CREDIT	0.00
LANDSCAPE AREAS AT FULL CREDIT	0.00
LANDSCAPE AREAS AT 1/4 CREDIT	0.00
TOTAL PROPOSED LANDSCAPE CREDIT	0.00
PROPOSED FEE-IN LIEU	1.66
TOTAL CREDITS	1.66
REMAINING REQUIREMENT	0.00

### SIGNIFICANT & SPECIMEN TREE TABLE (BASED ON FIELD VISIT - DEC. 2017)

TREE NO.	BOTANICAL NAME	COMMON NAME	D.B.H. (in.)*	VARIANCE TREE	CONDITION	CRZ (SF)	CRZ IMPACT (SF)	CRZ IMPACT %	DISPOSITION
ON-SITE TREES (TAGGED)									
901	Platanus occidentalis	American Sycamore	40		Fair/Poor	11,310	0	0.00	SAVE
902	Liriodendron tulipifera	Tulip Poplar	28		Good	5,542	0	0.00	SAVE
903	Liriodendron tulipifera	Tulip Poplar	28		Good	5,542	0	0.00	SAVE
904	Liriodendron tulipifera	Tulip Poplar	27		Good	5,153	83	1.61	SAVE
905	Liriodendron tulipifera	Tulip Poplar	27		Good	5,153	0	0.00	SAVE
906	Liriodendron tulipifera	Tulip Poplar	29		Good	5,945	0	0.00	SAVE
907	Liriodendron tulipifera	Tulip Poplar	29		Good	5,945	635	10.68	SAVE
908	Nyssa sylvatica	Black Gum	30		Poor	6,362	230	3.62	SAVE
909	Liriodendron tulipifera	Tulip Poplar	30		Good	6,362	0	0.00	SAVE
910	Liriodendron tulipifera	Tulip Poplar	25		Good	4,418	0	0.00	SAVE
911	Liriodendron tulipifera	Tulip Poplar	26		Good	4,778	0	0.00	SAVE
912	Liriodendron tulipifera	Tulip Poplar	24		Good	4,072	362	8.89	SAVE
913	Robinia pseudoacacia	Black Locust	33		Very Poor	7,698	0	0.00	SAVE
914	Liriodendron tulipifera	Tulip Poplar	29		Good	5,945	43	0.72	SAVE
915	Liriodendron tulipifera	Tulip Poplar	26		Good	4,778	0	0.00	SAVE
916	Liriodendron tulipifera	Tulip Poplar	38		Fair	10,207	0	0.00	SAVE
917	Liriodendron tulipifera	Tulip Poplar	32		Good	7,238	0	0.00	SAVE
918	Liriodendron tulipifera	Tulip Poplar	25		Fair/Good	4,418	0	0.00	SAVE
919	Liriodendron tulipifera	Tulip Poplar	27		Fair	5,153	0	0.00	SAVE
920	Liriodendron tulipifera	Tulip Poplar	27		Fair/Poor	5,153	0	0.00	SAVE
921	Liriodendron tulipifera	Tulip Poplar	33		Fair	7,698	0	0.00	SAVE
922	Liriodendron tulipifera	Tulip Poplar	29		Fair/Good	5,945	0	0.00	SAVE
923	Liriodendron tulipifera	Tulip Poplar	26		Good	4,778	0	0.00	SAVE
924	Liriodendron tulipifera	Tulip Poplar	29		Fair/Good	5,945	0	0.00	SAVE
925	Liriodendron tulipifera	Tulip Poplar	26		Fair	4,778	0	0.00	SAVE
926	Liriodendron tulipifera	Tulip Poplar	24		Fair	4,072	0	0.00	SAVE
927	Liriodendron tulipifera	Tulip Poplar	26		Poor	4,778	0	0.00	SAVE
928	Liriodendron tulipifera	Tulip Poplar	26		Fair	4,778	0	0.00	SAVE
929	Liriodendron tulipifera	Tulip Poplar	25		Fair	4,418	0	0.00	SAVE
930	Quercus rubra	Northern Red Oak	39	✓	Good	10,751	830	7.72	SAVE
931	Quercus phellos	Willow Oak	38	✓	Good	10,207	3,109	30.46	SAVE
932	Quercus nigra	Water Oak	34	✓	Good	8,171	100.00	100.00	REMOVE
933	Quercus nigra	Water Oak	26		Good	4,778	2,132	44.62	REMOVE
934	Quercus phellos	Willow Oak	38	✓	Good	10,207	1,399	13.71	SAVE
935	Quercus phellos	Willow Oak	33	✓	Good	7,698	7,698	100.00	REMOVE
936	Quercus phellos	Willow Oak	36	✓	Good	9,161	9,161	100.00	REMOVE
937	Quercus rubra	Northern Red Oak	26		Good	4,778	4,778	100.00	REMOVE
938	Quercus rubra	Northern Red Oak	27		Good	5,153	5,153	100.00	REMOVE
939	Quercus nigra	Water Oak	31	✓	Good	6,793	6,793	100.00	REMOVE
940	Quercus phellos	Willow Oak	28		Good	5,542	5,542	100.00	REMOVE
941	Quercus phellos	Willow Oak	29		Good	5,945	5,945	100.00	REMOVE
942	Quercus phellos	Willow Oak	26		Good	4,778	4,778	100.00	REMOVE

BOLD TEXT = SPECIMEN TREE 30" OR GREATER DBH

\*DIAMETER AT BREAST HEIGHT

### SOILS TABLE

SYMBOL	SOIL*	CHARACTERISTICS				
		PRIME AGRICULTURE**	HIGHLY ERODIBLE***	SERPENTINIC****	HYDRIC GROUP*	K FACTOR*****
2C	GLENELG SILT LOAM 8-15% SLOPES	NO	NO	NO	B	0.32
16D	BRINKLOW-BROCKTOWN CHANNERY SILT LOAM 15-25% SLOPES	NO	YES	NO	B	0.28
53A	CODORUS SILT LOAM 0-3% SLOPES OCCASIONALLY FLOODED	NO	NO	NO	C	0.49
67UB	URBAN LAND-WHEATON COMPLEX 0-8% SLOPES	NO	NO	NO	B	0.49

SOURCES: \*USDA NRCS WEB SOIL SURVEY (<http://websoilsurvey.sc.egov.usda.gov>)

\*\*PAGE 140 TABLE 5 MONTGOMERY COUNTY, MARYLAND SOIL SURVEY

\*\*\*URBAN OR BUILT-UP AREAS OF THE PRIME AGRICULTURAL SOILS ARE NOT CONSIDERED PRIME FARMLAND PER THE

THE MONTGOMERY COUNTY, MARYLAND SOIL SURVEY PAGE 140 TABLE 5

\*\*\*\*PAGE 67 APPENDIX C ERODIBLE SOILS LIST M-NCPPC MONTGOMERY COUNTY ENVIRONMENTAL GUIDELINES

\*\*\*\*\*PAGE 120 MONTGOMERY COUNTY, MARYLAND SOIL SURVEY

\*\*\*\*\*TABLE 16 PAGE 212 MONTGOMERY COUNTY, MARYLAND SOIL SURVEY

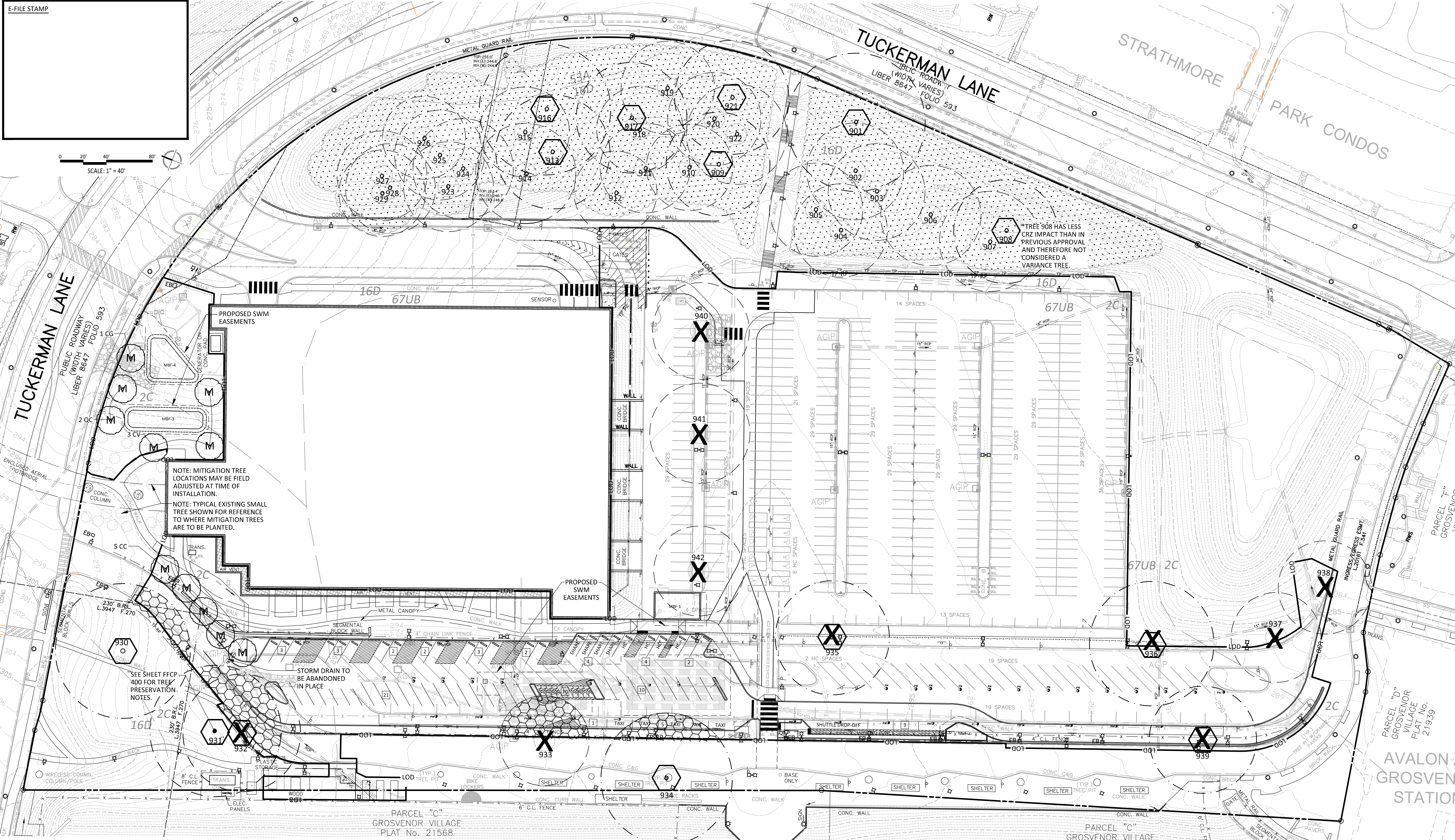
### MITIGATION TREE PLANT SCHEDULE

SHADE TREES						
QTY.	KEY BOTANICAL NAME	COMMON NAME	CALIPER	ROOT BALL	REMARKS	
3	CV Crataegus Viridis	Winter King Hawthorn	3- 3.5"	B&B	Single Leader, Matched, Symmetrical, Full Crown	
5	CC Carpinus caroliniana	American Hornbeam	3- 3.5"	B&B	Single Leader, Matched, Symmetrical, Full Crown	
1	CG Carya glabra	Pignut Hickory	4- 4.5"	B&B	Single Leader, Matched, Symmetrical, Full Crown	
2	QC Quercus coccinea	Scarlet Oak	3- 3.5"	B&B	Single Leader, Matched, Symmetrical, Full Crown	

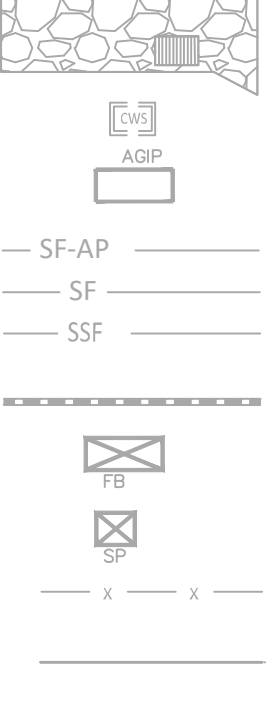
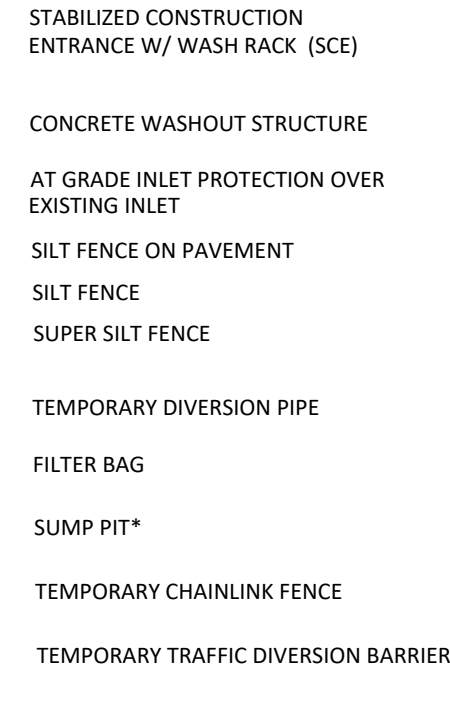
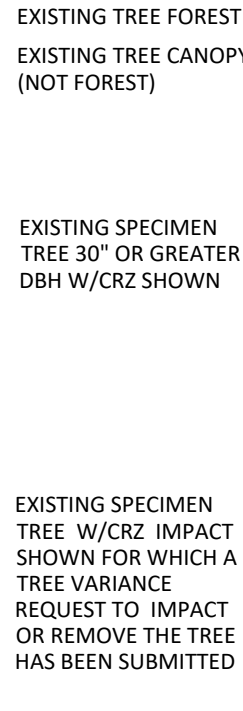
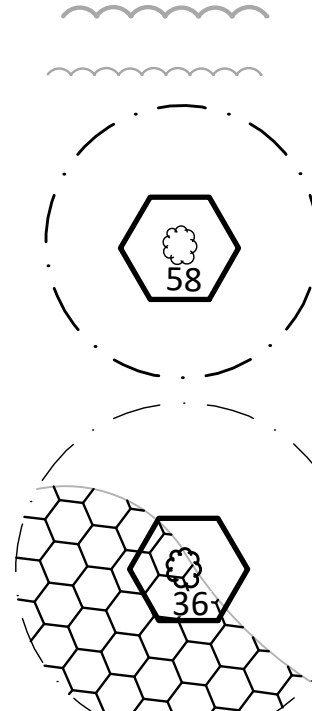
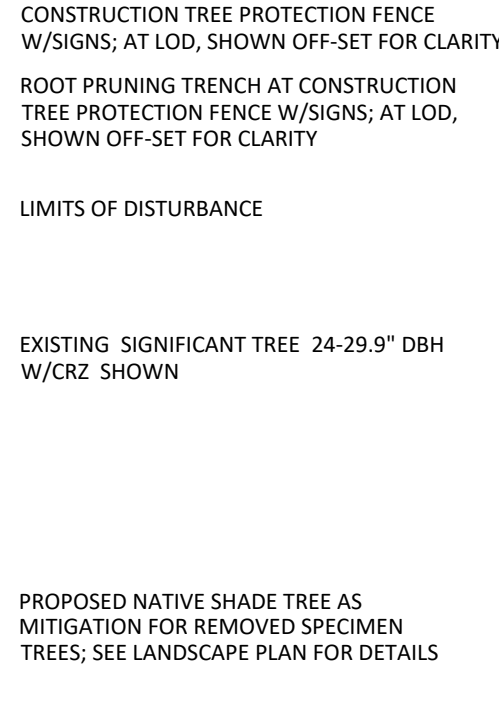
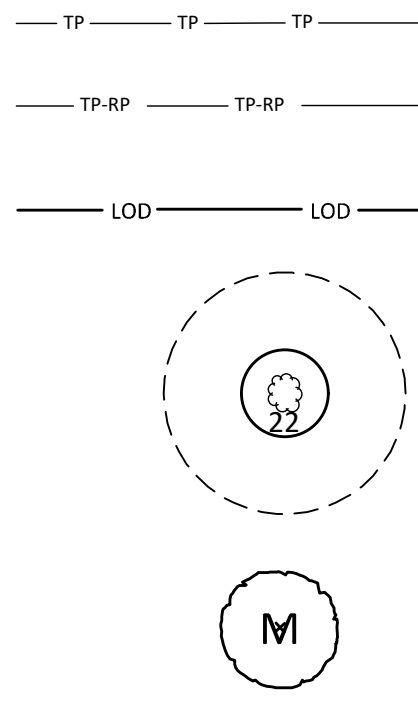
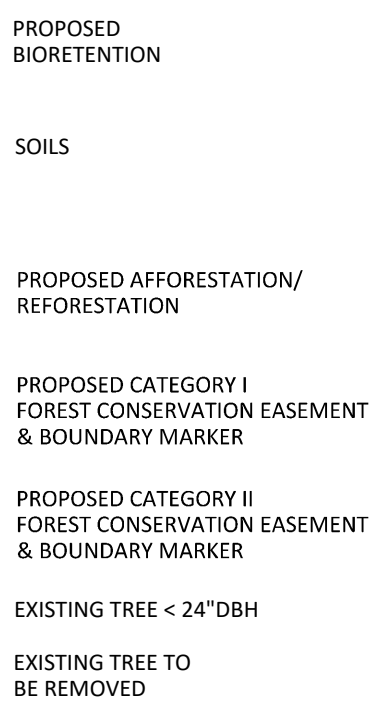
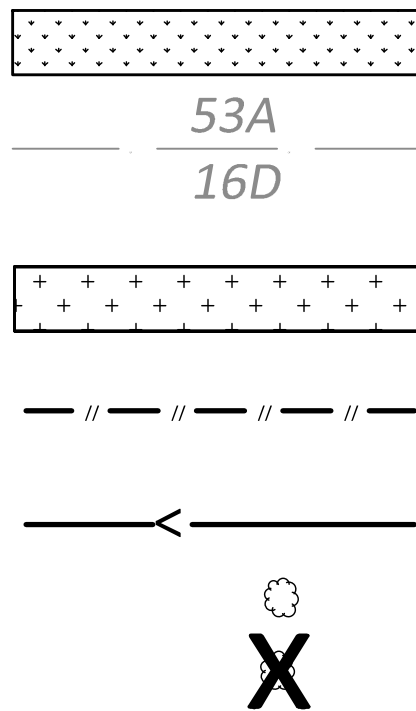
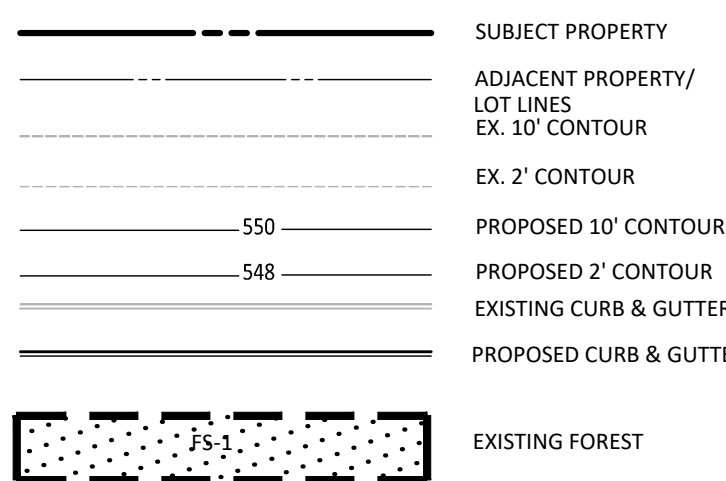


E-FILE STAMP

0 20' 40' 80'  
SCALE: 1" = 40'



## LEGEND



## DEVELOPER'S CERTIFICATE

THE UNDERSIGNED AGREES TO EXECUTE ALL THE FEATURES OF THE APPROVED FINAL FOREST CONSERVATION PLAN NO. MR-2018026 INCLUDING FINANCIAL BONDING, FOREST PLANTING, MAINTENANCE, AND ALL OTHER APPLICABLE AGREEMENTS.

DEVELOPER'S NAME: FIVESQUARE DEVELOPMENT @ GROSVENOR METRO, LLC  
PRINTED COMPANY NAME

CONTACT PERSON OR OWNER: ANDREW ALTMAN  
PRINTED NAME

ADDRESS: 1 THOMAS SQUARE, NW STE. 200, WASHINGTON D.C. 20005

PHONE & E-MAIL: (202) 640-4445

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

**Vika**  
ENGINEERS PLANNERS  
LANDSCAPE ARCHITECTS SURVEYORS  
Vika Maryland, LLC  
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GERMANTOWN, MARYLAND 20874  
PHONE: 301.916.4100  
FAX: 301.916.2262  
GERMANTOWN, MD TYSONS, VA

PREPARED FOR:  
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DEVELOPMENT @  
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SYLKE KNUPPEL, PE

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STEVE ROBINS

TRAFFIC ENGINEER  
**WELLS + ASSOCIATES**  
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CHRIS TURNBULL

PLANNING, CIVIL ENGINEERING  
**Vika Maryland, LLC**  
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SUITE 400  
GERMANTOWN, MD 20874  
301.916.4100  
LAURENT MOUNAUD, PE

REVISIONS	DATE
1 INITIAL SUBMISSION	4/25/2018
2 SECOND SUBMISSION	6/11/2018

PROFESSIONAL SEAL

I HEREBY CERTIFY THAT THESE DOCUMENTS WERE PREPARED OR APPROVED BY ME, AND THAT I AM A QUALY LICENSED, REGISTERED LANDSCAPE ARCHITECT UNDER THE LAWS OF THE STATE OF MARYLAND.  
NAME: DOUGLAS L. KESLER, RLA  
LICENSE NUMBER: 3861  
EXPIRATION DATE: JANUARY 24, 2020

**GROSVENOR - STRATHMORE**  
**WMATA GARAGE**  
**EXPANSION**  
4TH ELECTION DISTRICT  
MONTGOMERY COUNTY,  
MARYLAND  
WSSC GRID: 213NW05  
TAX MAP: HP123

## COMPOSITE FINAL FOREST CONSERVATION

DRAWN BY: DLK  
DESIGNED BY: DLK  
DATE ISSUED: 04/25/2018  
Vika PROJECT VM50226A  
APPLICATION NO.

SHEET NO. FFCP 200





April 24, 2018

Area 2 Division  
Montgomery County Planning Department  
M-NCPPC  
8787 Georgia Avenue  
Silver Spring, MD 20910

**Re: Forest Conservation Tree Variance Request  
Grosvenor-Strathmore WMATA Garage Expansion Mandatory Referral  
Forest Conservation Plan Amendment MR-2000201  
VIKA # VM50226A**

Dear Mr. Findley:

On behalf of the property owner, WMATA (the "Applicant") through Fivesquares Development @ Grosvenor Metro, LLC, we are submitting this Tree Variance Request in compliance with Natural Resources, Title 5, Section 5-1607 of the Maryland Code, which requires the Applicant to file for a variance to remove or impact any tree greater than 30" in diameter-at-breast-height (dbh); any tree with a dbh equal to or greater than 75% of the current state champion; trees that are part of a historic site or associated with a historic structure; any tree designated as the County champion tree; and any tree, shrub, or plant identified on the rare, threatened or endangered list of the U.S. Fish and Wildlife Service of the Maryland Department of Natural Resources, if a project did not receive Preliminary Forest Conservation Plan Approval prior to October 1, 2009.

This Tree Variance Request is accompanying the submission of the Preliminary Forest Conservation Plan with Mandatory Referral MR-2000201.

The 14.58-acre Property is located in North Bethesda, Montgomery County, Maryland along Tuckerman Lane and 200 feet east of Rockville Pike. It is currently developed with the Grosvenor-Strathmore Metro 6-story parking garage, bus loop and facilities, Kiss & Ride parking facilities, and a 412-space surface parking lot. It is generally bounded by Tuckerman Lane to the east and north, residential uses to the east/south, and Metro tracks to the west. The proposed WMATA project will consist of a southern and western expansion of the existing parking garage, removal of the surface parking lot, addition of a bike station, redesign of the Artswalk, and reconfiguration of the Kiss & Ride facilities. The Applicant is submitting this request for the removal/disturbance of seven (7) affected trees on the Property, including: the removal of four (4) specimen trees; and disturbance of three (3) specimen trees (collectively, the "Subject Trees").

Table 1 on the following page lists the Subject Trees as they are identified on the Preliminary Forest Conservation Plan and provides their respective proposed impacts.





**Table 1**

TREE NO.	BOTANICAL NAME	COMMON NAME	D.B.H. (in.)*	CONDITION	CRZ (SF)	CRZ IMPACT (SF)	CRZ IMPACT %	DISPOSITION
<b>ON-SITE TREES (TAGGED)</b>								
930	Quercus rubra	No. Red Oak	39	Good	10,751	830	7.72	Save
931	Quercus phellos	Willow Oak	38	Good	10,207	3,109	30.46	Save
932	Quercus nigra	Water Oak	34	Good	8,171	8,171	100.00	Remove
934	Quercus phellos	Willow Oak	38	Good	10,207	1,399	13.71	Save
935	Quercus phellos	Willow Oak	33	Good	7,698	7,698	100.00	Remove
936	Quercus phellos	Willow Oak	36	Good	9,161	9,161	100.00	Remove
939	Quercus rubra	No. Red Oak	31	Good	6,362	6,362	100.00	Remove

\* Diameter at breast height in inches

The Assessment was performed by Douglas Koeser, RLA, ISA during a site visit in December of 2018. A visual at-grade-level inspection with no invasive, below grade, or aerial inspections was performed for each tree. Decay or weakness may be hidden out of sight for large trees.

- Tree # 930: 39" Northern Red Oak (Quercus rubra):** Tree #930 is west of the Grosvenor Metro Kiss & Ride and Bus Lane entrance road.
  - Field Condition:** Good
  - Proposed CRZ Impact:** Minimal at 7.72%, as the tree is approximately 40 feet from the limits of disturbance.
  - Disposition:** Tree #930 is specified to be saved.
- Tree # 931: 38" Willow Oak (Quercus phellos):** Tree #931 is west of the Grosvenor Metro Kiss & Ride and Bus Lane entrance road, approximately twenty (20) feet from the curb.
  - Field Condition:** Good
  - Proposed CRZ Impact:** Significant at 30.46%, as the tree is adjacent to the proposed disturbance for the construction of the sidewalk.
  - Disposition:** Tree #931 is specified to be saved.
- Tree # 932: 34" Water Oak (Quercus nigra):** Tree #932 is near tree #931 located west of Grosvenor Metro Kiss & Ride and Bus Lane entrance road, approximately four (4) feet from the curb.
  - Field Condition:** Good





- **Proposed CRZ Impact:** Extensive at 100% as the tree lies entirely within the project limits of disturbance for the construction of the proposed sidewalk.
  - **Disposition:** Tree #932 is specified to be removed.
4. **Tree # 934: 38" Willow Oak (*Quercus phellos*):** Tree #934 is west of the Grosvenor Metro Bus Loop Lane, in the area between the bus lane and the station tracks, near the plaza entrance to the Grosvenor Metro Station.
- **Field Condition:** Good
  - **Proposed CRZ Impact:** Minimal at 13.71%
  - **Disposition:** Tree #934 is specified to be saved.
5. **Tree # 935: 33" Willow Oak (*Quercus phellos*):** Tree #935 is in the middle of the island between the Surface parking lot and the Kiss & Ride parking lot.
- **Field Condition:** Good
  - **Proposed CRZ Impact:** Extensive at 100% as the tree lies entirely within the project limits of disturbance for the construction.
  - **Disposition:** Tree #935 is specified to be removed.
6. **Tree # 936: 36" Willow Oak (*Quercus phellos*):** Tree #936 is just to the west of the Kiss and Ride parking lot.
- **Field Condition:** Good
  - **Proposed CRZ Impact:** Extensive at 100% as the tree lies entirely within the project limits of disturbance for the construction.
  - **Disposition:** Tree #936 is specified to be removed.
7. **Tree # 939: 31" Northern Red Oak (*Quercus rubra*):** Tree #939 is in the middle of the island between the Bus Lane and Kiss & Ride parking lot.
- **Field Condition:** Good
  - **Proposed CRZ Impact:** Extensive at 100% as the tree lies entirely within the project limits of disturbance for the construction.
  - **Disposition:** Tree #939 is specified to be removed.

#### **Justification Narrative for Tree Disturbance**

We submit the following rationale in support of the request for a Forest Conservation Tree Variance:

The 14.58-acre property is located along Tuckerman Lane in North Bethesda, Montgomery County, Maryland and across the street from the Music Center at Strathmore. As stated in the introduction of this correspondence, the proposed WMATA project will consist of an expansion to the existing garage, removal of the surface parking lot, addition of a bike station, redesign of the Artswalk, and reconfiguration of the Kiss & Ride facilities.

The proposed improvements are necessary to implement the larger-scale, future redevelopment recommended for the Property in the *2017 Approved and Adopted Grosvenor Strathmore Metro Area Minor Master Plan* (the "Master Plan"). M-NCPPC and thereafter, the County Council, spent the last year





or so working on the Master Plan, specifically for the purpose of ensuring that the Grosvenor-Strathmore Metrorail site would be redeveloped in a manner acceptable to M-NCPPC in accordance with a concept proposed by Fivesquares and WMATA. The proposal fully complies with the recommendations contained in the Master Plan.



The site is currently developed with the Grosvenor Metro Station, garage, surface parking and existing forest.

Under Section 5-1611, variances may be granted

- (a) ... where owing to special features of a site or other circumstances, implementation of this subtitle would result in unwarranted hardship to an Applicant.
- (b) Variance procedures adopted under this section shall:
  - (1) Be designed in a manner consistent with the spirit and intent of this subtitle; and
  - (2) Assure that the granting of a variance will not adversely affect water quality.

The variance is in conformance with Section 22A-21(d) of the Montgomery County Code because the granting of the variance (i) will not confer a special privilege on the Applicant that would be denied to others; (ii) is not based on conditions or circumstances which result from the action of the Applicant; (iii) is not based on a condition related to land or building use, either permitted or non-conforming, on a neighboring property; and (iv) will not violate State water quality standards or cause measurable degradation in water quality. Each of these is described in detail below.

**1. Describe the special conditions peculiar to the property which would cause the unwarranted hardship.**

The Property is located within an urbanized area of Montgomery County, directly adjacent to the Grosvenor-Strathmore Metro Station. Given its transit-oriented location, the Property is currently significantly underutilized. As a result, and given the age of the Metro Station improvements, a large number of trees currently exist on the Property.

The Property provides an excellent opportunity for infill re-development at a density reflective of its location adjacent to the Grosvenor-Strathmore Metro Station. The Property is proposed to be re-zoned CR 3.0, C-0.5, R-2.75, H-300', which reflects the appropriateness of the Property for high-density mixed-use development.

In conformance with the goals and objectives of the recently adopted Master Plan, the Applicant is proposing to develop a transit-orient community on the Property that will create a walkable and vibrant new center for the local community and Metro commuters, integrating the arts (given its proximity to the Music Center at Strathmore), residences, affordable housing, beautiful open spaces and vibrant places with neighborhood amenities ("Strathmore Square"). The currently proposed improvements take an important first step toward accommodating the future Strathmore Square development. Given the urban and transit-oriented nature of the Property, the currently proposed infrastructure improvements (e.g. expansion to the existing garage, reconfiguration of the Kiss and Ride parking facilities, addition of a bike station, renovation of the existing Artswalk, a pedestrian corridor that connects the site to Music Center at Strathmore, and associated upgrades), which are necessary to implement the mixed-use, pedestrian friendly, transit-oriented development recommended in the Master Plan, simply cannot be accommodated if the Subject Trees could not be removed.

**2. Describe how enforcement of these rules will deprive the landowner of rights commonly enjoyed by others in similar areas.**

Because of the location and dispersal of the trees throughout the Property, and the extent of their critical root zones, the inability to remove the Subject Trees would prevent the Applicant from making any significant changes to the site or developing the Property in a manner that is consistent with the Master Plan. It would also deprive the Applicant of opportunities enjoyed by others with similarly situated properties in the CR Zone, in close proximity to transit. Any redevelopment of the Property, consistent with the approved CR zoning, the County's goals as expressed through the Master Plan, and WMATA's Metro Station redevelopment policies would require similar levels of disturbance and tree loss.

**3. Verify that State water quality standards will not be violated or that a measurable degradation in water quality will not occur as a result of the granting of the variance.**





The variance will not violate state water quality standards or cause measurable degradation in water quality. The Subject Trees are not located within a stream buffer, wetland or special protection area.

In connection with the infrastructure improvements described above, the Applicant and Fivesquares are proposing improvements to the existing storm drain system and to provide stormwater management per current regulations. The existing conditions on the Property include a parking garage and a surface parking lot serving the Metro Station. There is an existing stormwater management pond on-site and stormwater is currently conveyed via a closed system (storm drain pipe) to the pond, which ultimately discharges to the Rock Creek. The concept stormwater management plan incorporates the State's / County's Environmental Site Design (ESD) to the Maximum Extent Practicable (MEP), according to the latest revision to Chapter 5 of the MDE Stormwater Management Design Manual. The proposed development includes treatment via two (2) micro-bio retentions (planter-type) located adjacent to the parking garage, two (2) micro-bio retentions (at-grade facilities) located along Tuckerman Lane, and two (2) underground stormwater management storage and treatment systems located beneath the Kiss & Ride parking lot.

The current Maryland Department of the Environment (MDE) Stormwater Management regulations that Montgomery County has adopted require the use of environmental site design (ESD) techniques to treat the runoff from 1 inch of rainfall on all new developments, where stormwater management is required. Per MDE's 2000 Maryland Stormwater Design Manual, "[t]he criteria for sizing ESD practices are based on capturing and retaining enough rainfall so that the runoff leaving the site is reduced to a level equivalent to a wooded site in good condition[.]" Therefore, the variance will not affect water quantity standards and no measurable degradation in water quality will be experienced because effective mitigation measures are being provided.

#### **4. Provide any other information appropriate to support the request.**

The subject property is located on a corner lot in a highly visible and desirable location in North Bethesda across from Strathmore Hall and adjacent to the Grosvenor-Strathmore Metro Station. As mentioned above, the proposed improvements take a necessary and important first step toward realizing the County's goals for the Property as expressed in the Master Plan.

All efforts have been made to save Specimen Trees on the Property, where possible. For example: in consultation with a certified arborist, we propose special precautions that will be taken with specimen tree #931 which has less than 33% CRZ disturbance, but is being disturbed relatively close to its trunk. To ensure that the tree has a strong chance of survival, a professional arborist will be engaged to oversee its protection and maintenance.

Specific measures to be taken may include:

- Reduced LOD: We have shown the maximum LOD anticipated in this application, but we may be able to reduce the LOD based on field conditions and final grading during construction;



- Root Pruning: Light-weight machinery with rubber tracks or tires, such as a bobcat with a vibratory plow (or equivalent) may be used during root pruning with hand pruning of roots over 1" diameter within critical root zones. Deep excavations will be reviewed when open for hand root pruning during construction. Coordinate with silt fence installation to minimize unnecessary root damage.
- Prescribed Pruning: Size, health, species and impact from proposed construction will be taken into consideration in determining pruning type for each tree. Minimal interior green including sprouts will be removed. Hazard pruning to 2" diameter limbs will remove dead, dying, declining branches. Lower limbs obstructing equipment will be clearance pruned to avoid breakage. All work will be specified by ANSI A-300 arboricultural standards.
- Wood Chip Mulch: Install mulch at 6-8 Inches in depth on area Impacted by proposed construction. Mulch shall be double ground shredded hardwood, composted for at least 18 months from an approved source. Insufficiently or improperly aged mulch containing high bacterial counts or elevated levels of bark mulch resistant to decomposition shall not be used. Mulch will not contact trunk of tree. Edging is neither necessary nor desirable for this operation. Mulch will be removed after construction has ended.
- Tree Protection Fencing: Install tree protection fencing around the specimen tree impacted by proposed construction.
- Tree Growth Regulator (Cambistat® Or Equivalent): After root pruning has occurred, apply a tree regulator such as Cambistat® (or equivalent) to the tree. Dilute tree regulator in water and apply as a soil drench or soil injection using the appropriate application equipment. This can occur anytime during the growing season if the ground is not frozen or saturated with water. Research shows that Cambistat® gently slows the growth of trees, allowing the tree to redirect some of its energy from canopy growth into defense chemicals, fibrous root production, and stored energy. This reallocation of energy will result in a healthier, more durable tree.
- Soil Nutrient Management: Add granular and/or liquid bio-stimulant and microbial inoculants/amendments to rebuild and restore proper balance and composition for healthy, stress resistant root systems to the tree. Application of the amendments shall be implemented once a year in the fall as part of a maintenance program. Soil testing before treatments and after the second year of treatments determines formulations and the need for following years based upon response.

However, the creation of multiple tree-save areas on the Property was ultimately impossible, given the necessary infrastructure improvements required to accommodate the future transit-oriented redevelopment envisioned in the Master Plan. The proximity of the Subject Trees to the proposed infrastructure improvements makes it impossible to save these Subject Trees. The development of the Property, in a manner consistent with the County's goals, is not feasible while retaining all the specimen trees that surround it.

To mitigate the loss of the Subject Trees, the Applicant and Fivesquares are proposing on-site plantings. The Project will accommodate all mitigation on-site, at a ratio of 4:1 (4" removed DBH





inches to 1" replaced DBH inches). The on-site plantings will provide various environmental benefits and tree canopy that will compensate for the loss of the Subject Trees.

In conformance with Section 22A-21(d) of the Code, the variance will not confer a special privilege on the Applicant that would be denied to others. Rather, as discussed above, the variance will prevent a significant hardship to be incurred by the Applicant as well as the deprivation of rights to the Applicant that have been enjoyed by others similarly situated. The requested variance is based on plans being developed under 1) the approved zoning, 2) the County's goals as expressed through the recently approved Master Plan; and 3) WMATA's Metro Station redevelopment policies, not conditions or circumstances resulting from actions by the Applicant. There are no conditions relating to land or building use, either permitted or non-conforming, on a neighboring property that have played a role in the need for this variance.

Thank you for your consideration of this Tree Variance Request. We believe that the supporting information provided with this letter clearly demonstrate that the grant of the Variance pursuant to Section 22A-21(b) of the Code is appropriate in this case. If you have any questions or need more information, please do not hesitate to contact us so that we may discuss this matter further. We appreciate your consideration of this request.

Sincerely,

*VIKA Maryland, LLC.*

A handwritten signature in black ink, appearing to read 'Douglas Koeser', with a long horizontal line extending to the right.

*Douglas Koeser, RLA, ISA  
Senior Landscape Architect*

