

Item 5 - Correspondence

From: [Linda Andrews](#)
To: [MCP-Chair](#)
Subject: Ellsworth project
Date: Friday, May 8, 2020 1:45:36 PM

Good day,

I am writing today to express my concerns for the plans for Ellsworth Drive in downtown Silver Spring.
<https://ggwash.org/view/74146/after-15-years-downtown-silver-spring-is-getting-a-big-update>

The idea of having artificial turf is a terrible idea. We need to avoid options that involve so much plastic and synthetic materials. More and more research shows that plastics are terrible for the environment and people's health. Plus it seems like it would be difficult to keep clean (gum, dog pee, spilled food and drinks, etc.) and sanitary.

Why not go with pavers and lots of large planters? More real grass and rain gardens. In my search for suggestions, I came across High Line in New York. Although Ellsworth is not elevated, I imagine that it could not support deep root growth. So possibly this might be a good model, or something along those lines.

Please more Downtown Silver Spring more green with less impervious surfaces! I've seen some great changes in Silver Spring over the course of the 28 years I have lived here. Now is the time to step back and think about the impact of all the development and to return some green space to our downtown area.

Thank you,
Linda Andrews
113 Fleetwood Terrace
Silver Spring, MD





After 15 years, Downtown Silver Spring is getting a big update

PUBLIC SPACES By **Dan Reed** (Editorial Board) October 9, 2019 29



The plaza on Ellsworth Drive will be totally rebuilt, including the removal of the popular "splash pad." [Image](#) by Foulger-Pratt used with permission.

A lot of things happened in the summer and the fall of 2004, when I was starting my senior year of high school. What sticks out most is the night in August I stood with three of my closest friends at the entrance of a new parking garage in downtown Silver Spring, yet to open, daring each other to go in.

The concrete was still clean and smooth as we strode up the big ramp, our voices bouncing around seven empty floors as we ascended. At the top of the garage, we walked out onto the sun setting over the then-brand new

development called Downtown Silver Spring: a 20-screen movie theatre, a Whole Foods, a hotel, a brightly-colored tile plaza with a fountain.

It felt especially surreal for the 16-year-old me, [having lived in little-D downtown Silver Spring](#), [land of boarded-up buildings and empty storefronts](#), until 5th grade. Now there were [signs saying “Silver SprUng”](#) (as in, Silver Spring had “sprung”) and even a [TV commercial](#).

At the moment, the only sound came from some whirring generators in a corner by the elevator that would take us back down, and my friend Sean looked over his shoulder as he slid over, unzipped his pants, and took a piss. We had christened this place and made it ours.

Fast forward 15 years

A few weeks ago, at 31, I sat in a crowd of about 50 people in the Silver Spring Civic Building listening to Bryant Foulger of Foulger-Pratt, the developer who built [Downtown Silver Spring](#), explain [how he was going to renovate the place](#). Foulger-Pratt and property manager Peterson Companies will bring in new tenants like wine bar [Locavino](#) and [bowling alley The Eleanor](#); [commissioned murals by DC creative agency No Kings Collective](#), and will permanently close part of a parking lot and the development’s spine, Ellsworth Drive, to cars.



Ellsworth Drive could get covered in artificial turf. [Image](#) by Foulger-Pratt used with permission.

“The nature of retail is changing. It’s much more focused on experience,” said Foulger. “We’re also focused on physical plant. Things are wearing out...so we’re thinking about ways to refresh it.”

Fifteen years may not seem like a long time. But Foulger noted that when Downtown Silver Spring opened, in phases starting in 2000 (Ellsworth Drive opened in 2004) and concluding in 2013, the project was kind of experimental. Just a few years earlier, most of downtown was nearly scrapped and replaced with a Mall of America clone. Silver Spring was still struggling after decades of middle-class flight, and some local shopkeepers worried the new development would steal business from them.

“There was a lot of uncertainty, a lot of things we didn’t know would work,” he said. “But as this opened and all of you started coming here, we saw what worked and we saw things we wanted to change.”



Downtown Silver Spring's retail has changed with the times, like Borders, which closed in 2011. Image by the author.

When it opened, DTSS (as the kids call it) had the kind of places you'd go to once in a while, for big purchases: sit-down, white-tablecloth restaurants; high-end furniture and home design stores like Storehouse and Marimekko; and a few basic needs that neighbors had asked for, like a hardware store. The development was marketed as “[A Good Old-Fashioned Sensory Overload](#),” but [one resident described it](#) as a cross between Bethesda and Adams Morgan “with more culture.”

Instead, the place attracted teens and families who weren't big spenders, but did come to hang out every weekend. The furniture stores were first to go, and Silver Spring may have even [kept Borders Books & Music on life support](#) before it finally folded. Taking their place were stores that sold cheaper things you'd buy more often, like fast-casual restaurants and “fast fashion” retailers like H&M. Ellsworth Drive [closed to cars some weekends](#), then every weekend, and eventually all the time.

Over time, DTSS evolved into not just a shopping center, but the heart of a diverse community. Montgomery County [opened the Silver Spring Civic Building in 2010](#) and the [Silver Spring Library in 2015](#) adjacent to the development, providing access to public services and a platform for gatherings, from the [annual Ethiopian Festival](#) to [protests](#). Today, the development looks prescient: Silver Spring is now one of [Montgomery County's strongest real estate markets](#), and you can see little bits of DTSS across Maryland and Virginia, and even in DC neighborhoods like Columbia Heights and the Wharf.

More changes, and more questions

Just like me, generations of kids have now grown up with this place, as there's a lot of free or cheap stuff to do. We used to kill time in Borders and sneak into R-rated movies; today, little kids might run around in the splash pad, or take up skateboarding, which Silver Spring has been a hub for since the 1990s.

Those last two things may be going away. Foulger's plans include replacing the splash pad with an “interesting, iconic” art piece and water feature, and the area surrounding it will get large, movable woodblocks which can work

as seating or be pushed together to form a stage. Ellsworth Drive will become a lawn for most of its length.



After 15 years, the trees on Ellsworth Drive have gotten really big! Image by the author.

“This will be ironic if you’ve been here a while, but we’re going to put down artificial turf,” said Foulger, referring to “[The Turf](#),” the popular temporary hangout that used to sit where Veterans Plaza is now. Unlike “The Turf,” which was basically empty green space, this turf will have movable chairs and games like cornhole.

People had a lot to say about this. “Is this going to create a noisy atmosphere? Silver Spring is very noisy,” said one man. “What’s wrong with pavement?” asked a woman. Another woman got up and said, “You have a lot of homeless and mentally ill, and they’re going to sleep on that furniture.”

But the biggest questions were about whether the new turf will disrupt the activities that currently happen on Ellsworth Drive, like the weekly farmers’

market (produce trucks can drive on turf, Foulger said). Parents of young children asked where their kids would play without the splash pad.



Kids play in the splash pad in 2009. Image by the author.

“There are lots of ways to engage kids,” said Foulger. “We engaged them with water, we’ll engage them with something different, and in a couple of years we’ll do something else.”

Skaters are likely to get pushed out under this plan, just as [they were from Veterans Plaza](#) shortly after it opened, and [back in the 1990s from East of Maui](#), a skate park once located on Ellsworth Drive. People have been skating here for over 20 years, and while people mentioned that [they like watching skateboarders](#), there wasn’t an answer about where they’ll go.

Urban places are always evolving

As director of the Silver Spring Regional Services Center—a fancy term for a county position that is unofficially called the “Mayor of Silver Spring”—for over a decade, Reemberto Rodriguez and has seen many of the changes

in Downtown Silver Spring firsthand. Even as neighbors fretted over the future of Ellsworth Drive, he was sanguine about the possibilities.



A crowd forms to watch skateboarders on Ellsworth Drive in 2008. Image by the author.

“No urban space can stay static for a decade,” he told the crowd. “If it does, it is economically dead. It is proven.”

This meeting, and the 15th anniversary of my friend peeing on a parking garage, has made me reflect on Downtown Silver Spring and what it meant to my life. I spent my late teens goofing off here, and now I work across the street and until recently I lived a few blocks away. I have a lot of memories in this place. I’ve seen this place evolve, and this place has seen me grow into an adult, which is a weird thing to say about something that’s basically an outdoor shopping mall. But it shows that the DTSS experiment worked: it means a lot to a lot of people, and naturally people are going to feel protective of it.

Some of the changes in Downtown Silver Spring are already underway, like a multi-colored new paint job and murals. Bigger changes, like removing the fountain and laying turf on Ellsworth Drive, require approval from the Montgomery County Planning Board. Before the developers submit those plans for review, [they've created a website with more info](#) and are holding a community meeting to discuss them on Thursday, October 10 from 7 to 8 pm at the Courtyard Marriott, located at 8506 Fenton Street.

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Tagged: [development](#), [maryland](#), [montgomery county](#), [public spaces](#), [retail](#), [silver spring](#)



Dan Reed is an urban planner and freelance writer. Check out his regular column in [Washingtonian](#) and his blog, [Just Up the Pike](#). He's also an agent at [Living In Style Real Estate](#). Dan still gets a full night's sleep. He lives in downtown Silver Spring. All opinions are his own.

29 COMMENTS

THREADED NEWEST AT BOTTOM NEWEST AT TOP

[cpterp](#) on October 9, 2019 at 11:07 am

This looks like a solid update and should mesh well with FP's "Inventa Towers" across the street. Peterson has done a great job at most at creating "from scratch" mixed-use urban centers, especially DTSS, National Harbor, and Washingtonian/Rio (which is in the midst of its own overhaul), more so than most other developers.

I wish that they would get rid of the confusing name here though, especially now that actual "downtown Silver Spring" has completely transformed into one of the region's most successful 24-7 mixed-use/TOD hubs.

"We're also focused on physical plant [DO WE MEAN PHYSICAL PLANS HERE?]."

From: [Eric Brenner](#)
To: [Bogdan, Grace](#); [MCP-Chair](#)
Subject: Downtown Silver Spring; PPAN 91998005C, SPAN 81999002M
Date: Monday, June 8, 2020 7:42:10 PM

TO: Grace Bogdan/Casey Anderson

FR: Eric Brenner

RE: comments on DTSS project and site plan amendments, Ellsworth Dr.

Plenty of others have weighed in on the pros/cons of Peterson Co. switching to a turf surface on part of Ellsworth Dr. No need for more comments, however one topic still seems unaddressed by the most recent proposed amendments.

The Montgomery County Planning Board has made considerable efforts related to improved bicycle/pedestrian access in DTSS, including some of the biggest projects connecting to the Colesville-Georgia-Cedar-Wayne footprint, with the Fenton st. bike proposal still to come.

The proposed changes on Ellsworth seem to have not just ignored this recent work, but they are actively trying to reduce access, something that seems counter to the interests of the businesses in this footprint. While this is not the direct topic of these amendments, the Planning Board seems well within your duty to ensure that any new changes complement (and not work against) the bike/trail work nearby, and are consistent with the bike master plan.

Even improving bike parking (safe?, adjacent to the security station by the parking garage?) would complement the goals that the proponents of these changes are trying to make...but making it more difficult to access Ellsworth by bike seems counterproductive to all of the stated goals...and easily remedied.

From: [Bogdan, Grace](#)
To: [MCP-Chair](#)
Subject: FW: Staff Recommendations DTSS Proposals
Date: Thursday, June 11, 2020 9:55:12 AM

For Item 5 on the 6/18 PB agenda

From: Avorce <avorce@aol.com>
Sent: Wednesday, June 10, 2020 11:38 PM
To: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>
Subject: Re: Staff Recommendations DTSS Proposals

Hi Grace.

I'm still reading and rereading the new documents posted on the DTSS proposal to be considered by the Planning Board on June 18.

I ran across one item in particular that worries me.

In a May 13 letter to Ms. LaBaw of DPS (Fire Department Access and Water Supply), VIKA (representing the Peterson Company) stated that

... the developer is also proposing a layer of vehicular-rated artificial turf, to be affixed to the existing asphalt within a portion of the abandoned Ellsworth Drive." (Attachment D, p. 43 of the Attachments)

In all the reading I have done about SYNLawn and SYNTipede 343, I have **never** seen any vehicular rating for the synthetic turf. In fact, SYNLawn repeatedly notes on its website that its product SYNTipede 343 is recommended for landscaping, pets, play and rooftops. The certifications the company lists are for playgrounds or (in the case of one flammability certification) rooftops.

As far as I can tell, VIKA's representation to DPS is mistaken - unless there is something I've missed. I would expect that this representation was important in the decision to review and ok any Fire Department and other vehicular access issues in the lead up to the Board meeting.

There are a few other concerns I'd like to mention:

- The applicant does not provide a temperature map of the area under discussion. It provides a relative shade map based on one date. Has the County asked for likely temperatures of the synthetic turf ? In one of its documents, a representative for the applicant states that the turf may be ten degrees hotter than the current asphalt. That's a big change from now and pretty hot.

In the Care and Maintenance Manual the applicant provided, reference is made to the "turf stabilization temperature". (p.5, Attachments, p.25) Do we know what that temperature or range is for the product proposed and how the location and items

around it would affect it ? (For example, the Care and Maintenance Manual cautions that "heat absorbing materials" should not be left on the turf.)

- As far as I can tell, no one knows the dimensions of the 4 sides of the area proposed for the synthetic carpet. We only know that the applicant has represented that the area affected is less than 5,000 square feet. How can we find these dimensions ? (I tried to do estimates based on the online drawings scale but could not figure out with any certainty whether the area affected was over or under 5,000 square feet.)

- Do we know whether the weekly Farmers' Market will still be held on Ellsworth ? If so, will their vehicles also be allowed on Ellsworth ? Do we know the scope of use by delivery trucks otherwise ? It is important to have a very concrete idea of vehicular use of the Ellsworth space.

Thank you for your guidance.

Anne Vorce

-----Original Message-----

From: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>
To: Avorce <avorce@aol.com>
Sent: Wed, Jun 10, 2020 8:54 am
Subject: RE: Staff Recommendations DTSS Proposals

Good Morning Anne-

The staff report posted yesterday, it is available in the links below. I've also included a link for signing up to testify, the deadline for signing up to testify is noon on Wednesday June 17th.

Thanks,

Grace

Staff Report: <https://montgomeryplanningboard.org/wp-content/uploads/2020/06/DTSS-project-and-site-plan-amendment-final-staff-report.pdf>

Attachments: https://montgomeryplanningboard.org/wp-content/uploads/2020/06/DTSS_81999002M-91998005C-attachments.pdf

Sign up to testify: <https://montgomeryplanningboard.org/meetings/signup-to-testify/>

From: Avorce <avorce@aol.com>

Sent: Tuesday, June 9, 2020 5:39 PM

To: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>

Subject: Staff Recommendations DTSS Proposals

Hi Ms.Bogdan.

I cannot find the Staff Recommendations noted on the Planning Board's June 18 agenda for the DTSS proposals that are scheduled to be considered.

Have they been posted yet ? How can I obtain them ?

Thank you.

Anne Vorce
Silver Spring

From: [Lauren Posten](#)
To: [MCP-Chair](#)
Subject: Foulger Pratt's proposal for DTSS - Synthetic Grass
Date: Thursday, June 11, 2020 10:45:31 AM

Hello,

I'm a local resident that often visits downtown Silver Spring. I am excited about the revitalization but PLEASE PLEASE do not install synthetic grass!! It's a horrible idea; dogs may go to the bathroom on it, gum will get stuck to it, etc.

It's just downright tacky and there is no reason to change the current concrete.

Thank you,

Lauren

From: [Rasch, Eric](#)
To: [MPC Chair](#)
Subject: Downtown Silver Spring SITE PLAN AMENDMENT No. 81999002M; LIMITED SITE PLAN AMENDMENT No 91998005C
Date: Friday, June 12, 2020 3:28:40 PM
Attachments: [image001.png](#)

Dear Planning Board Chair Casey Anderson,

Hope that you're doing well. Please know that I still want to talk with you about the skate park activation/concessions idea on Veterans Plaza. I think now is a good time to look at that more than ever.

The reason I'm reaching out today is because I was taken aback to learn that Foulger Pratt/Peterson Companies was proposing to move art onto Veterans Plaza without talking with me. (see snippet from proposal below – set to go in front of you on Thursday).

It's bad enough that we are looking at a "psychedelic black hole" on the Peterson Property directly facing the Civic Building and Veterans Plaza. For that art installment, the artist created a "toilet design", and then after everyone asked what they were thinking with that design, they repainted it to the psychedelic black hold design with visible below and not much better – it's just not offensive. As far as I know they didn't seek any input – and certainly didn't reach out to me for my thoughts.

I've also heard from folks that they do not like the AstroTurf street design and believe AstroTurf would cause problems with cleaning, delivery, and safety.

When you have a chance, I'd like to connect and share my thoughts regarding the upcoming plans for Downtown Silver Spring. My cell: 301-792-3311



- The Applicant is trying to see if it's possible to relocate Light Web, a light sculpture by Craig Kraft (shown in Image D) on the façade of an existing building.



'Celebration of Life: Homage to Food Plants of the World'



Proposed location for restored 'Celebration of Life: Homage to Food Plants of the World' mural Veterans Plaza

Image C: Celebration of Life Mural by Jorge Somarriba (2004)

Stay home, Stay safe, Be well,

Eric Rasch, CPM, MPS
Operations Manager, Silver Spring Civic Building at Veterans Plaza
The region's premier gathering place for government, culture, commerce and community!
Office: 240.777.5308 Email: eric_rasch@montgomerycountymd.gov

*For up-to-date information about the Coronavirus in Montgomery County, visit: <https://montgomerycountymd.gov/HHS/RightNav/Coronavirus.html>

Take 10 minutes to be counted now – visit: <https://2020census.gov/>



For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19

From: [Sears, Barbara A.](#)
To: [MCP-Chair](#)
Cc: [Boudan, Grace](#); ["Paul Weinschenk"](#); [Bryant Foulger](#); ["Kelly M. Price"](#); [Sears, Barbara A.](#)
Subject: Downtown Silver Spring- Project Plan and Site Plan Amendments Scheduled before the Planning Board on June 18, 2020
Date: Monday, June 15, 2020 12:29:31 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[DSS GBT Letter of Support 2020 06 09.pdf](#)

Dear Chairmen Anderson-

As the attorney for the Applicants for Downtown Silver Spring, Project Plan Amendment 91998005C and Site Plan Amendment 81999002M, scheduled for action before the Planning Board on June 18, 2020, we request that the attached support letter from GBT Realty Corporation on behalf of the owner of Ellsworth Place, be made a part of the record of the hearing.

Thank you.

Barbara

Barbara A. Sears

11 N. Washington Street | Suite 700 | Rockville, MD 20850-4229
D: +1 301.517.4812 | O: +1 301.762.1600 | F: +1 301.517.4812



For COVID-19 information and resources, please visit our [Coronavirus Task Force page](#).

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GBT REALTY CORPORATION

June 9, 2020

Mr. Casey Anderson, Chair
And Members of the Montgomery County Planning Board
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, Maryland 20910

Mr. Christopher Conklin, Director
Montgomery County Dept. of Transportation
101 Monroe Street, 10th Floor
Rockville, MD 20850

Re: Project Plan Amendment 91998005C, Site Plan Amendment 81999002M, and
Petition for Abandonment of Portions of Ellsworth Drive – Downtown Silver Spring

Dear Mr. Anderson, Planning Board Members, and Mr. Conklin:

GBT Realty Corporation ("GBT") is writing, on behalf of Avante Ellsworth Venture I LLC ("Ellsworth Place Owner"), the owner of Ellsworth Place in Silver Spring. A portion of Ellsworth Place borders part of Ellsworth Drive. GBT is the manager of Ellsworth Place and has had the opportunity to review the proposals of PFA to amend its project plan and site plan for Downtown Silver Spring, including PFA's request to abandon its remaining section of the existing Ellsworth Drive right-of-way as it intersects with Fenton Street, and a public access easement that currently includes the balance of Ellsworth Drive.

Ellsworth Place Owner supports PFA's project plan and site plan amendments and the requested abandonment. The amenities and improvements proposed by PFA are extensive and will greatly enhance both Ellsworth Place and Downtown Silver Spring. For full implementation of the amenities proposed, the abandonment to Ellsworth Drive is required. Ellsworth Drive has been closed to non-essential traffic for many years with positive impacts for pedestrians, tenants, patrons, and visitors. Ellsworth Place has not experienced any negative vehicular access or circulation issues as a result of the closure, nor has the general area. We believe the formal closure and improvements proposed in the amendments and by the abandonment will best position Ellsworth Place and Downtown Silver Spring for continued success and community support.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trey Culpepper". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Trey Culpepper
Vice President Capital Holdings
GBT Realty Corporation
On behalf of
Avante Ellsworth Venture I LLC

cc: Paul Weinschenk

From: [Rasch, Eric](#)
To: [MCP-Chair](#)
Subject: RE: Downtown Silver Spring SITE PLAN AMENDMENT No. 81999002M; LIMITED SITE PLAN AMENDMENT No 91998005C
Date: Monday, June 15, 2020 6:11:33 PM
Attachments: [image002.png](#)

Hello Catherine,

Thanks for reaching out. The comments that I sent to Casey last week were pretty raw.

Maybe you could also share this with him and others so there's a bit more background and it's easier to follow.

1. I've been the Operations Manager for the Civic Building at Veterans Plaza for seven (7) years; the Civic Building will be 10 years old this summer. It's a wildly successful gathering place but wasn't so when I arrived seven years ago. It took a lot of work, vision, and most importantly cooperation with others to make it a success.
 - a. During that time, I've seen little cooperation from Peterson Companies with respect to others in the downtown area.
2. Peterson Companies approach to operating in downtown Silver Spring could be described as self-centered; my experience -- they only work with MCG when they want something otherwise MCG doesn't cross their mind in the decision making process.
 - a. Example: RE: security issues, Peterson (private) relies on the Police (public) at a disproportionate rate to other private properties. When a Councilmember asked why Peterson hasn't hired more security, it was met with a detached response.
3. No thought has been put into the displacement of skateboarders. During quarantine, Veterans Plaza has become the new public skate park. If they have an AstroTurf street, where are the Skateboarders to go? They'll be at Veterans Plaza or other places in downtown SS.
4. Peterson may have discriminated against festival/event organizers. While I don't float this idea openly, it is something that you should be aware about. I've received complaints against Peterson Companies from ethnic groups over the years.
5. When we've shared feedback from the community with Peterson, it's been met with a *we don't care, we're doing it anyways* attitude.
 - a. Example: iconic fountain being shut down, controversy with operations of fountain, and now a proposal to get rid of it.
 - b. Iconic mosaic stairway removed --- and replaced with neon lights.
6. When the community has asked them about homeless issues, they lock their public bathrooms -- leaving the homeless community to find other areas in downtown Silver Spring to relieve themselves -- which in turn is a public health issue.
 - a. The public has asked them if they were going to provide bathroom accommodation in this new proposal -- they said they are not and it's not open for discussion.
7. Unsolicited feedback from a NYC professional park designer (Park and Planning Guest Speaker) was sent to Peterson Companies --- and it has been met with -- we don't care, we're doing it anyways.
 - a. Example: Concerns about AstroTurf design -- from community and from professionals.
8. No effort to coordinate with County partners before putting up a massive art mural (black hole) on a wall that faces one of Montgomery County's premier gathering places for Concerts, Festivals, Weddings, Bar/Bat Mitzvahs, Quinceañeras.
 - a. Users have provided feedback that it takes away from their photos and cheapens the experience.

Over the years, when I questioned Peterson privately about their lack of cooperation, Peterson took the position that they didn't have to cooperate because they were a private property owner; this is what they've told me as recent as today. This attitude is harmful and needs to be addressed; maybe this is the best mechanism --- I've tried in private for some time now.

I know this email is a bit out of context -- so I'm hoping that maybe I can schedule a bit of time with Casey or others that this will go to. If possible, I'd like to share my thoughts now and not at the public meeting. It's in the best interest of downtown SS to work together in order to make Silver Spring a desirable place to live, work, and visit. If Peterson fails, we fail, and if we fail, Peterson fails. With so much development on the horizon, we cannot afford to operate in isolation.

*if you look at the attached pictures -- it should be apparent that the weight of this truck will start to break down the AstroTurf covering quickly. The professional from NYC's Highline project and Times Square has warned against using AstroTurf and has suggested using Green Paint on the street for everything from durability to safety to cleaning.

I hope to continue this conversation.

Stay home, Stay safe, Be well,

Eric Rasch, CPM, MPS
Operations Manager, Silver Spring Civic Building at Veterans Plaza
The region's premier gathering place for government, culture, commerce and community!
Office: 240.777.5308 Email: eric_rasch@montgomerycountymd.gov

*For up-to-date information about the Coronavirus in Montgomery County, visit: <https://montgomerycountymd.gov/HHS/RightNav/Coronavirus.html>

From: MCP-Chair <mcp-chair@mncppc-mc.org>
Sent: Monday, June 15, 2020 3:51 PM
To: Rasch, Eric <Eric.Rasch@montgomerycountymd.gov>
Subject: RE: Downtown Silver Spring SITE PLAN AMENDMENT No. 81999002M; LIMITED SITE PLAN AMENDMENT No 91998005C

[EXTERNAL EMAIL]

Good afternoon,

I am confirming receipt of your comments for distribution to the Planning Board and staff to review.

Thank you,

Catherine Coello, Administrative Assistant
The Maryland-National Park and Planning Commission
Montgomery County Chair's Office
8787 Georgia Ave, Silver Spring, MD 20910
Main: 301-495-4605 | Direct: 301-495-4608 | Fax: 301-495-1320
www.MontgomeryPlanningBoard.org

From: Rasch, Eric <Eric.Rasch@montgomerycountymd.gov>
Sent: Friday, June 12, 2020 3:29 PM
To: MCP-Chair <mcp-chair@mncppc-mc.org>
Subject: Downtown Silver Spring SITE PLAN AMENDMENT No. 81999002M; LIMITED SITE PLAN AMENDMENT No 91998005C

Dear Planning Board Chair Casey Anderson,

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The reason I'm reaching out today is because I was taken aback to learn that Foulger Pratt/Peterson Companies was proposing to move art onto Veterans Plaza without talking with me. (see snippet from proposal below -- set to go in front of you on Thursday).

It's bad enough that we are looking at a "psychedelic black hole" on the Peterson Property directly facing the Civic Building and Veterans Plaza. For that art installment, the artist created a "toilet design", and then after everyone asked what they were thinking with that design, they repainted it to the psychedelic black hold design with is visible below and not much better -- it's just not offensive. As far as I know they didn't seek any input -- and certainly didn't reach out to me for my thoughts.

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When you have a chance, I'd like to connect and share my thoughts regarding the upcoming plans for Downtown Silver Spring. My cell: 301-792-3311



- The Applicant is trying to see if it's possible to relocate Light Web, a light sculpture by Craig Kraft (shown in Image D) on the façade of an existing building.

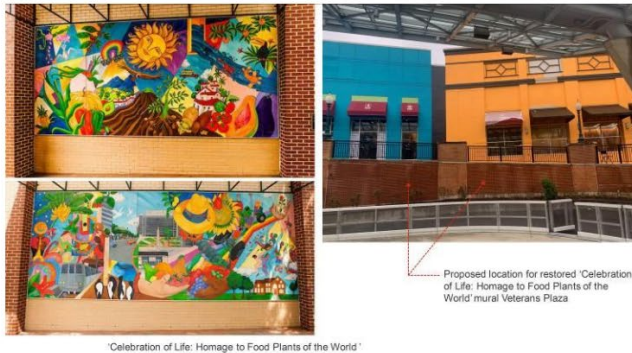


Image C: Celebration of Life Mural by Jorge Somarriba (2004)

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Eric Rasch, CPM, MPS
Operations Manager, Silver Spring Civic Building at Veterans Plaza
The region's premier gathering place for government, culture, commerce and community!
Office: 240.777.5308 Email: eric_rasch@montgomerycountymd.gov

*For up-to-date information about the Coronavirus in Montgomery County, visit: <https://montgomerycountymd.gov/HHS/RightNav/Coronavirus.html>

Take 10 minutes to be counted now – visit: <https://2020census.gov/>



For COVID-19 Information and resources, visit: www.montgomerycountymd.gov/COVID19







From: [Bogdan, Grace](#)
To: [MCP-Chair](#); [Dickel, Stephanie](#)
Subject: Fwd: Peterson Site Plan Amendment 81999002M
Date: Tuesday, June 16, 2020 7:35:50 AM

From: Avi Halpert <ahalpert@unither.com>
Sent: Monday, June 15, 2020 8:05:52 PM
To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>
Cc: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>
Subject: Peterson Site Plan Amendment 81999002M

Dear Casey -

Just a quick note to register my support for all the wonderful improvements that the Peterson Companies plan to incorporate into their Downtown Silver Spring Retail Project.

In my opinion, these improvements go hand-in-hand with best practices for urban retail space and play nicely into everything I am reading from thought leaders in the new pandemic and post pandemic retail environment.

I read the entire staff report dated 8 June 2020 and received a presentation of the earlier iterations of plans by Peterson. The Area 1 teams responses/write up were clear and well thought out.

Hyperlinks to some of the referenced documents would be helpful.

The process to procure these rights in Montgomery County are exhaustive compared to the various other municipalities that United Therapeutics has a real estate footprint, but that is another discussion and I digress from the support of this worthwhile project.

Let's wrap this project up, so Peterson can commence the excellent work that they started many years ago.

Onward –

Avi

Avi Halpert
Real Estate & Construction
United Therapeutics Corporation
1040 Spring Street
Silver Spring, Maryland 20910
301-608-9292
www.unither.com

From: [Bogdan, Grace](#)
To: [MCP-Chair](#)
Subject: Fwd: Testimony for 6/18/20 -Downtown Silver Spring - Project Plan Amendment 91998005C / Site Plan Amendment 81999002M
Date: Tuesday, June 16, 2020 12:48:26 PM
Attachments: [Silver Spring - Artificial Turf Testimony - June 18, 2020.docx](#)

FYI for Item 5 on 6/18

Thanks!

From: Amanda Farber <amandafarber@hotmail.com>
Sent: Tuesday, June 16, 2020 12:27:44 PM
To: Anderson, Casey <Casey.Anderson@mncppc-mc.org>; Wright, Gwen <gwen.wright@montgomeryplanning.org>; Kronenberg, Robert <robert.kronenberg@montgomeryplanning.org>; Bogdan, Grace <grace.bogdan@montgomeryplanning.org>; Dickel, Stephanie <Stephanie.Dickel@montgomeryplanning.org>; Hisel-McCoy, Elza <elza.hisel-mccoy@montgomeryplanning.org>; Cichy, Gerald <Gerald.Cichy@mncppc-mc.org>; Patterson, Tina <tina.patterson@mncppc-mc.org>; Natali Fani-Gonzalez <natalifanigonzalez@gmail.com>; Verma, Partap <Partap.Verma@mncppc-mc.org>
Subject: Testimony for 6/18/20 -Downtown Silver Spring - Project Plan Amendment 91998005C / Site Plan Amendment 81999002M

Please see attached for my written testimony for 6/18/20. I support a *thoughtful* renovation of Ellsworth Drive and vicinity; but I OPPOSE paving Ellsworth Drive in Silver Spring with plastic artificial turf.

Thank you!
Amanda Farber

June 15, 2020

Re: Downtown Silver Spring - Project Plan Amendment 91998005C / Site Plan Amendment 81999002M

From: Amanda Farber

To: Planning Board Chair Anderson and Commissioners Patterson, Fani-Gonzales, Cichy, and Verma; Planning Director Wright; Robert Kronenberg; Grace Bogdan, Stephanie Dickel, Elza Hizel-McCoy

I am writing to support a *thoughtful* renovation of Ellsworth Drive and vicinity; but to OPPOSE paving Ellsworth Drive in Silver Spring with plastic artificial turf. Green plastic does not equal green space.

A better alternative would be for the applicant to install cooler light colored permeable pavers, add movable self-watering plant containers (such as the ones Bethesda Urban Partnership has been using recently), and include additional permanent landscaping to go along with the proposed moveable seating and interactive attractions. As we have seen from the long time popularity of Bethesda Lane and the recent popularity of area “streeteries,” there is no need to pave a street with plastic to make it a successful public space.



Ellsworth Ave midday on 6/12/20 – full sun; project rendering; example of moveable planters and seating.

I have spent the last 2 years observing and documenting problems with artificial turf in our area. Here are some of the reasons I am opposed to gluing down artificial turf on Ellsworth Drive:

Polluting From Beginning to End

Plastic artificial turf is a petrochemical product. It is “green” in color alone. It wears down over time creating microplastic pollution (even without infill) and emitting greenhouse gases as it degrades in the environment. There are massive growing disposal issues for artificial turf at the end of its limited lifespan.

The artificial turf industry has made many misleading claims about recycling that have come to light in recent years. SynLawn, the artificial turf brand being proposed for Ellsworth Drive, claims its product is “100% recyclable.” When questioned about this claim the company stated it “technically can be recycled anywhere.” Where is “anywhere”? What is the name of the facility that will actually recycle rolls of this material and where is it located?

If actual artificial turf recycling was so easy and readily available than Montgomery County Public Schools would not have recently shipped 40,000 pounds of old plastic rolls from Walter Johnson HS a company in Malaysia that refuses to disclose their address; there would not be old rolls from Richard Montgomery HS stashed next to Bird River in Baltimore; and there would not be growing stockpiles of the material throughout the US, including the old turf mountain I personally came across last week in central Virginia.

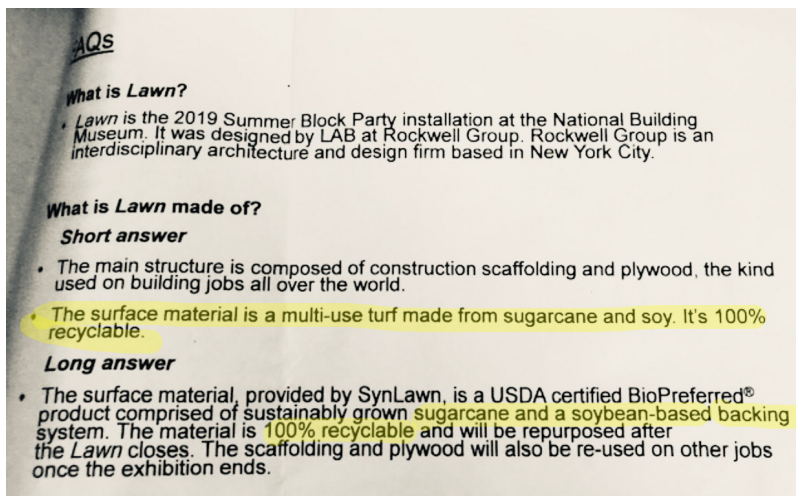


Example of a petrochemical plant; broken plastic grass blades from artificial turf; pile of old artificial turf in Virginia.

Misleading Marketing and Greenwashing

SynLawn promotes its products as being made from “sugarcane and soy.” However the fine print indicates the products mostly consist of petroleum-based plastic and “proprietary chemical components.” I visited the “Lawn” exhibit sponsored by SynLawn at the National Building Museum in DC in August 2019. I was surprised that the museum docents were telling visitors that the material was just made from “sugarcane and soy.” When I questioned why they were not referring to the material as what it really was - plastic - a museum employee told me they “were given talking points to answer sugarcane and soy and to also say that the material was 100% recyclable.”

That employee then passed me a copy of those misleading talking points.



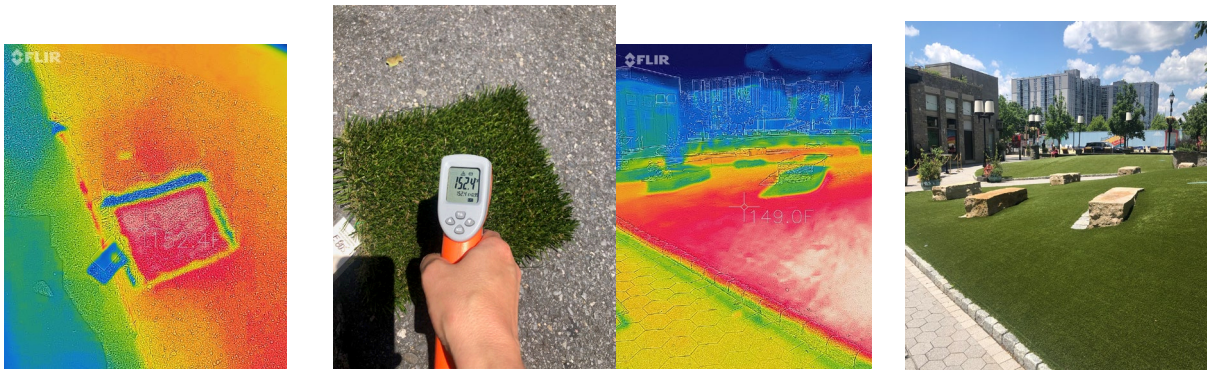
synlawn.com

Additional information	
Warranty	Unmatched Limited Lifetime Warranty* (call for details)
Foot Traffic	4
Softness	2
Grass Zone Yarn	Polyethylene
Grass Zone Color	Field Green + Apple
Grass Zone Denier	10,000/6
Thatch Zone Yarn	Polyethylene
Thatch Zone Color	Field Green + Beige
Thatch Zone Denier	5,040/12
Grass Zone Yarn Shape	Omega
Finished Pile Height	1.0"
Finished Pile Weight	60 oz
Backing Primary	15/18 Polypropylene 2-part
Backing Secondary	20 oz. EnviroLoc™
Tuft Machine Gauge	3/8"
Total Weight	86 oz

SynLawn talking points; some of the SynLawn fine print.

Urban Heat Island

Plastic synthetic turf gets as hot as, or hotter than, asphalt on warm sunny days. This is true even for brands marketed as being “cool.” Ellsworth Drive does get direct sun during summer days. Here are photos taken at 1:00 pm last Friday, June 12, 2020. The weather was a warm sunny 85 degrees. The surface of the asphalt was in the 130-140Fs. The surface of a segment of artificial turf was approximately 150F. Over at Pike and Rose at 2 pm the same day the installed artificial turf was also reaching upwards of 150F.



FLIR thermal imaging and laser thermometer at Ellsworth Drive in DTSS and Pike and Rose in Rockville. 6/12/2020.

Downtown Silver Spring has considerable asphalt and building coverage and minimal tree canopy or real green space in the core area. Last year the Urban Land Institute released a report entitled “Scorched” and hosted an excellent forum regarding urban heat islands and ways to reduce their impacts. The report offered many suggestions for creating better heat resistant built environments. Use of hot plastic artificial turf was not one of them.

<https://americas.uli.org/research/centers-initiatives/urban-resilience-program/extreme-heat/>

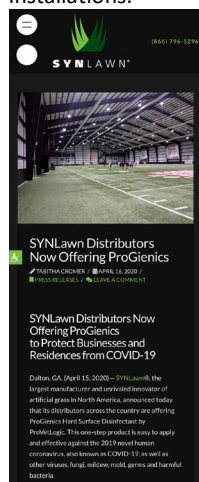
Myth of Low Maintenance

Any artificial turf glued down to Ellsworth Drive will have to be regularly and frequently cleaned and maintained. It will have food and drink spilled on it, urine and waste from people walking their dogs, and children sitting and crawling on it. All of the major turf companies, including SynLawn, have been recommending regular use of disinfectant on artificial turf surfaces due to “Covid-19, as well as other viruses, fungi, mildew, mold, germs, and harmful bacteria.”

<https://www.synlawn.com/press-releases/synlawn-distributors-now-offering-progienics/>



Pieces of SynLawn coming loose at the Lawn exhibit at the National Building Museum, turf glue used in artificial turf installations.



SYNLawn Chesapeake Bay
Amanda Farber We can't give out proprietary information on chemical components but the product being used for this project is a soy based product and is USDA Certified. It is technically a plastic as you stated but this means it can technically be recycled anywhere. We do not use any rubber with our products which is typically an issue with some people trying to recycle turf.

24w Like Reply

SYNLawn Chesapeake Bay
Amanda Farber our turf is 100% recyclable and we are actually installing a bio-based product there which is made with soy beans and sugar cane.

24w Like Reply

SynLawn recommending frequent disinfection; additional communications with SynLawn.

From: [Carol Farthing](#)
To: [MCP-Chair](#)
Cc: tom.hucker@montgomerycountymd.gov; county.council@montgomerycountymd.gov
Subject: plastic carpet proposal--Reference: Project Plan No. 91998005C and Site PlanNo. 81999002M
Date: Tuesday, June 16, 2020 4:56:51 PM

Dear Chair Anderson,

I am writing to express my agreement with the Friends of Sligo Creek letter of April 20, 2020 urging the planning board to reject the Foulger Pratt proposal to install plastic carpet on Ellsworth Drive. Everything I have read about synthetic carpet makes it clear that there are serious concerns about possible chemical pollution in our watershed and health concerns to those who use it.

I recall the large synthetic green carpet on what is now the plaza in front of the Civic Center. Initially, it seemed to be a pleasant idea. However, over time it became filthy and unsightly. Ellsworth Drive provides ample area to walk around the shops in DTSS and also can be easily and safely accessed by vehicles when desirable, such as in emergencies. It makes no sense to me to invest financial resources in a product with obvious drawbacks

Sincerely,

Carol Farthing

406 Dale Dr.
Silver Spring, MD 20910

From: [Victoria Pierce](#)
To: [MCP-Chair](#); [Wright, Gwen](#)
Cc: councilmember.albornoz@montgomerycountymd.gov; councilmember.friedson@montgomerycountymd.gov;
councilmember.glass@montgomerycountymd.gov; councilmember.hucker@montgomerycountymd.gov;
councilmember.jawando@montgomerycountymd.gov; councilmember.katz@montgomerycountymd.gov;
councilmember.navarro@montgomerycountymd.gov; councilmember.rice@montgomerycountymd.gov;
councilmember.riemer@montgomerycountymd.gov
Subject: Objection to Synthetic Turf on Ellsworth Drive
Date: Tuesday, June 16, 2020 6:57:55 PM

Dear Chair Anderson,

As a resident of East Silver Spring for over 20 years I have watched the wonderful development of the plaza area downtown and witnessed with disappointment its current decline. I see that the developer Folger Pratt has created an ambitious plan for revitalizing the area, but my focus in this letter is my strong objection to the synthetic turf proposed for Ellsworth Drive.

Why would we want what in my younger days was called "astro-turf" to carpet any of our streets? It was unappealing then, and this version is chemically hazardous, dangerously hot in warm weather - indeed flammable, and just plain inappropriate now.

I have read the letter to you from the Friends of Sligo Creek (FOSC). They present a disturbing environmental picture if you were to proceed with this artificial grass. The product is clearly not suitable for the proposed space and the water contamination and other water management problems make it wholly unacceptable for use on Ellsworth Drive (or any large space around here for that matter).

Please reject this part of Folger Pratt's proposal, for now and as precedent for the future of our community. We have acceptable alternatives to this plastic carpet proposal.

Sincerely,

Victoria Pierce
Pershing Drive

From: [Bogdan, Grace](#)
To: [MCP-Chair](#)
Subject: FW: Silver Spring Planning board - synthetic turf on Ellsworth
Date: Wednesday, June 17, 2020 8:51:35 AM

For 6/18 PB item 5.

Thanks!

From: Amy Thompson <athomptig@verizon.net>
Sent: Tuesday, June 16, 2020 4:28 PM
To: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>; Dickel, Stephanie <Stephanie.Dickel@montgomeryplanning.org>; 'Elza.Hisel-McCoy@montgomeryplanning.org'
Subject: Silver Spring Planning board - synthetic turf on Ellsworth

Hi,

So, I have some questions for you as I follow our neighborhood listserv comments and documents.

- Why do we need to have any sort of covering on Ellsworth at all? Is it all because of aesthetics?
- It seems to me that aesthetics alone is a pretty lame reason given how much evidence SOECA has presented on its toxicity – it's not like people are going sit on the turf that was there on the hill before the SS Civic Center was built, so why do it?
- If aesthetics is the issue, do people really care? Perhaps putting in cement (replacing the current asphalt) and trees and plants and more benches might work – it could be beautiful to stroll down Ellsworth and duck into a restaurant or store.
- Can't we use real turf like is maintained on golf course greens?

I could go on and on, but the decision already seems to be made.

I used to walk from my house near Sligo Creek Park into DDSS every day to go to work. It was great exercise and pleasant to see our neighborhood and watching families grow up and people putting touches on their yards and homes over time.

Then it became scary with all the gangs hanging out at the AMC Theatre in the evenings, so I adjusted my work hours. Then it became scary even in the mornings – instead of looking at the beautiful yards and flowers and trees I began to be in a fight flight mode. Soon I took the 15 bus down Wayne to Dale and when that became scary to have to walk from Wayne

to Pershing, a family member would drive me to and from work – forget the parking garages unless you were sure to walk into them when other people were doing the same at the same time, or asking the security guard in our building to walk me to my car. Now, I NEVER go into DDSS. Aside from the safety aspect, it's ugly, cookie cutter building with no character, crappy shops, and mostly restaurants – I guess that worked when Discovery was still there, when they moved out DDSS became empty.

Our community seems to be mostly legally and real estate focused – that's great, but no one seems to be concerned about safety.

Amy - Pershing Drive, Seven Oaks-Evansworth

From: [Kit Gage](#)
To: [MCP-Chair](#)
Subject: Friends of Sligo Creek testimony: 91998005C & 81999002M
Date: Wednesday, June 17, 2020 11:12:29 AM
Attachments: [FOSC Ellsworth Synturf MoCo Planning Board testimony 200618.docx](#)

Attached testimony for June 18, 2020

By Kit Gage

Advocacy Director

Friends of Sligo Creek



Montgomery County Planning Board Hearing

Downtown Silver Spring

Project Plan Amendmt: 91998005C, Site Plan Amendmt: 81999002M

June 18, 2020

Testimony of Friends of Sligo Creek

Kit Gage, Advocacy Director

www.fosc.org, advocacy@fosc.org

References: Site Plan Amendment 81999002M and Project Plan Amendment 91998005C, Foulger Pratt's proposals for changes to DTSS

Summary

- **OPPOSITION** - Friends of Sligo Creek's general position on the use of artificial plastic turf and playgrounds, is we oppose them. Whether plastic glued to asphalt, or other use of plastics on playground or field surfaces for use by individuals, including athletes, children, walkers and players, we oppose them. We also in general and in specific on this project, advocate the use of materials which function to capture and infiltrate stormwater. This testimony will address concerns only the use of plastic turf on top of Ellsworth Drive.
- **IMPROPER USE** - Intentionally or not, Foulger Pratt, the applicant, seemingly has not released or else exaggerated uses of SynTurf product it proposed to have placed on top of asphalt on Ellsworth Drive. Despite critical questions posed by

us, by Planning Board staff, and parts of the County Executive, the applicant has not provided sufficiently detailed or relevant scientific information for the Planning Board and public to evaluate. The manufacturer of the product has claimed certifications from the EPA and CPSC, but it has failed to provide supporting details. As a consequence, we believe there may be problems with the product proposed and certainly there are large knowledge gaps.

What we do know is that SYNLawn's SYNTipede 343 is recommended by the manufacturer for landscape, pets, rooftops and lawns – not the heavy foot traffic and vehicular use it will see on Ellsworth Drive. The developer is proposing a significant off-label use of this product, that is not certified or recommended. A different SYNLawn product would not eliminate these problems.

- **TOXIC GLUE:** The developer is also proposing a highly unusual installation – use of a toxic glue on the existing but milled asphalt. The adhesive's Safety Data Sheet warns that the substance should not go into storm drains or our waterways.
- **DIFFICULT MAINTENANCE:** SYNLawn's Care and Maintenance Manual must not be overlooked. The County or applicant in agreement with the County cannot follow the Manual and still protect the public and Sligo Creek. For example, the Manual recommends using dry cleaning fluid or mineral spirits to clean vehicle fluids. Does the Planning Board and County want this to go into Sligo Creek and for children and pets to walk on this? There are many other examples. Maintenance at least is a headache, but more likely impossible and will speed failure of the product. Please read the Manual.

As there will be no padding or underlayment on the SynTurf, as is typically installed, we would expect much higher rates of degradation, and wear and tear of the product, increasing maintenance and shortening its lifespan.

- **CHANGE THE PLAN:** To protect the public, Sligo Creek and our environment, we urge the Planning Board to change this plan, and to require the developer either to come up with another solution that is widely recognized as environmentally friendly or as a second choice, leave the asphalt in place.

We support the staff recommendation that the applicant propose an alternative to the synthetic turf proposal in the Certified Site Plan.

The stakes are high. The specific site is actively used by many people. Any decision will affect Sligo Creek and the surrounding environment. It is the core of development in Silver Spring and should be a healthy fun show piece.

Whatever the Planning Board decides here will undoubtedly be a precedent for other projects.

Specifics

Flammability

The Planning Board, County Council and County Executive should not allow a flammable material to be installed in a very active outdoor area, which drains in our water.

1. The DPS reviewer states that it is flammable. **The plastic grass product proposed is substantially petroleum-based.** The substantial petroleum content makes the product flammable, as the County's Departments of Permitting Services and Transportation have recognized. ***Montgomery County should not allow people to use and vehicles to drive on a flammable surface.***
2. The applicant has failed to produce scientific evidence that (1) the material with any coating is not flammable and (2) any resulting fire will not release harmful chemicals that would be toxic if inhaled. They produced test results for plastic carpeting as flooring and roofing, but not for the actual conditions that will exist on Ellsworth. The test results did not establish that the material wasn't flammable – only that if any flame wouldn't spread. Moreover, they didn't respond to concerns that there might be ignition from emergency and delivery vehicles that would still be given access to that stretch of Ellsworth

See the very limited relevance of how applicant responded to flammability concerns, in a memo from the applicant's consultant Oculus (Brian Flynn) to Peterson and Foulger Pratt, April 10, 2020, p. 11, Attachment C of Attachments posted on PB Agenda items:

“Flammability

a. Based on the manufacturer’s published literature, the specified material has passed flammability testing according to D2859 “Standard Test Method for Ignition Characteristics of Finished Textile Floor Covering Materials”; This test method determines the flammability of finished textile floor covering materials when exposed to an ignition source; The specified material has passed this test and, as such, is rated as “flame resistant” under laboratory conditions. b. The material also passed testing according to ASTM E108-17 “Standard Test Methods for Fire Tests of Roof Coverings, Class A Spread of Flame Testing”. The specified material is therefore a Class A roofing material, offering the highest rating for resistance to fire. Note: SYNTipede 243, the specified material, is essentially the same, but with a shorter pile height.”

See also Staff Recommendations:

Safety/Flammability Both the Department of Permitting Services and commenters raised concerns about safety related to elevated temperatures and flammability. In response, the Applicant provided Staff a heat map of Ellsworth Drive (based on readings taken July 15, 2019) that shows the portion of the roadway where the synthetic turf is proposed maintains a high degree of shade and is not expected to create unsafe heat conditions. The Applicant also provided supplemental information on the synthetic turf product Page 18 which details the testing that was conducted by the manufacturer, which passes the “Class A” requirements of ASTM E108-17 flammability test applied to roofing materials, meaning the material is effective against severe test exposure, affords a high degree of fire protection, and does not present a flying hazard in terms of spread of flame.

Pp 18-19, Staff Recommendations

<https://eplans.montgomeryplanning.org/UFS/29273/84370/32-SR-81999002M%20Part%201.pdf/32-SR-81999002M%20Part%201.pdf>

Heat

Anyone who has visited that area knows it gets hot in the summer. Asphalt is already very hot. Mid-day sun falls on that roadway. The manufacturer has

admitted that SynTurf gets hotter than asphalt. New street trees will take years to provide shade (if they survive and thrive in that relatively difficult environment), and though early and late sun may not fall directly on the site, mid-day is a different matter. Farmers market, play activities and other events could become intolerable with greatly increased heat. What is the temperature or other environmental impact of the product on top of asphalt with a toxic glue?

Water Quality Management

How will this product degrade in addition to the massive loss of plastic blades? We're concerned about chemical contaminants and see no studies of evidence of safe decomposition, or of the absence of PFAS.

Stormwater Mitigation Required – over 5000 sq ft?

And Forest Conservation Plan

There have been conflicting and changing reports of the square footage of the area. Either way it's about the point where there should be stormwater mitigation. That is the rational thing to do, especially for a highly visible public use project.

Excerpt, staff recommendations, about 5,000 square ft:

"5. The site plan meets all applicable requirements of Chapter 22A regarding forest conservation, Chapter 19 regarding water resource protection, and any other applicable law.

The original Site Plan approval (819990020) included a Forest Conservation Plan, which required 3.08 acres of afforestation and was originally met through providing 3.25 acres of planting landscape trees and receiving credit for saving existing trees. This Project does not change the existing limits of disturbance (LOD), however the Applicant proposes to amend the Forest Conservation Plan to remove four landscape trees, and plant an additional nine landscape trees. This results in an additional 0.08 acres of landscape trees, bringing the total afforestation to 3.33 acres, exceeding the original 3.08-acre requirement. The Amendment will redesign and reconfigure an existing hardscape public use space and right-of-way. As such, the Project was not subject to stormwater

compliance review as the Amendment consists of less than 5,000 square feet of land disturbance, per Article II, 1031(c), which was confirmed by the Montgomery County Department of Permitting Services – Water Resources Section on October 30, 2019.”

P 23 <https://eplans.montgomeryplanning.org/UFS/29273/84370/32-SR-81999002M%20Part%201.pdf/32-SR-81999002M%20Part%201.pdf>

Summary of mischaracterized or exaggerated claims

- Vehicular rated: (Mischaracterization, consultant VIKa to Marie LaBaw, DPS, May 13 letter about Fire Dept). We raised this as a serious error to Grace Bogdan, PD staff, chief reviewer.
- Bio-based, environmental, green product: According to manufacturer data, the product is polypropylene with some additives.
- EPA, CSPC certifications: meaning what?
- The fire ratings: Limited relevance to expansive planned uses.

From: [Anne Ambler](#)
To: [MCP-Chair](#)
Cc: county.council@montgomerycountymd.gov; [Ortiz, Adam](#)
Subject: Foulger-Pratt proposal for plastic carpet on Ellsworth Drive: Please deny
Date: Wednesday, June 17, 2020 11:16:18 AM
Attachments: [Ellsworth synthetic turf letter FOSC final April 2020.docx](#)

Re: Project Plan No. 91998005C and Site Plan No. 81999002M
Foulger-Pratt proposal to install plastic carpet on Ellsworth Drive, Downtown Silver Spring, Montgomery County Planning Board hearing, June 18, 2020

Dear Chairman Anderson:

On behalf of the Neighbors of the Northwest Branch (NNWB), I urge you and the Planning Board not to approve the plan by Foulger-Pratt to carpet Ellsworth Drive with artificial turf. The NNWB, an all-volunteer nonprofit organization with members in Montgomery and Prince George's counties, is dedicated to the ecological restoration of the Northwest Branch of the Anacostia River. Since Sligo Creek is a major tributary of the Northwest Branch, what flows into Sligo Creek makes its way to the Northwest Branch. Plastic pollution, whether large pieces or microplastics, is already a problem in our waterways. New research shows that microplastics are even in the wind (<https://www.scientificamerican.com/article/microplastics-are-blowing-in-the-wind/>) and the rain (<https://earthsky.org/earth/rain-microplastic-rocky-mountains-colorado>). It makes no sense to add to global pollution by coating a street with this substance. We strongly support the arguments in the excellent letter you received from Friends of Sligo Creek dated April 20, 2020 (attached).

Montgomery County claims to be environmentally progressive. Now that we know much more about how widespread and harmful plastic pollution is, this county needs to act responsibly on that information and *reduce, not increase*, sources of environmental plastic contamination.

Thank you for the opportunity to comment.

Anne Ambler
Advocacy Chair



P.O. Box 4314
Silver Spring, MD 20914



April 20, 2020

To: Casey Anderson, Chair, Montgomery County Planning Board
Cc: Natali Fani-Gonzalez, Vice Chair, Montgomery County Planning Board
Gerald R. Clichy, Commissioner, Montgomery County Planning Board
Tina Patterson, Commissioner, Montgomery County Planning Board
Partap Verma, Commissioner, Montgomery County Planning Board

Marc Elrich, County Executive, Montgomery County

Sidney Katz, President, Montgomery County Council
Tom Hucker, Vice President, Montgomery County Council
Gabe Albornoz, Councilmember, Montgomery County Council
Andrew Friedson, Councilmember, Montgomery County Council
Evan Glass, Councilmember, Montgomery County Council
Will Jawando, Councilmember, Montgomery County Council
Nancy Navarro, Councilmember, Montgomery County Council
Craig Rice, Councilmember, Montgomery County Council
Hans Riemer, Councilmember, Montgomery County Council

Reference: Project Plan No. 91998005C and Site Plan No. 81999002M
Foulger Pratt proposal to install plastic carpet on Ellsworth Drive, Downtown Silver Spring, Montgomery County Planning Board hearing, possibly in May

Dear Chair Anderson:

“DO NO HARM”

We are writing on behalf of the Friends of Sligo Creek (FOSC) to state our opposition to the proposal by the developer Foulger Pratt to install plastic carpet on a portion of Ellsworth Drive in Downtown Silver Spring, part of the DTSS project now pending before the Planning Board. The proposal may be before you soon, possibly at a May meeting.

FOSC is the nonprofit organization dedicated to protecting and improving the health, safety and environmental quality of the Sligo Creek Watershed, in partnership with Montgomery and Prince George's County governments and agencies, Montgomery Parks and the people in our communities.

Your decision will affect our water quality.

FOSC urges the Planning Board to reject the proposal to put plastic carpet on Ellsworth Drive. The proposal raises troubling issues concerning its likely effects on the quality of our water, public safety, and watershed health. Simply put, we expect that Sligo Creek and our watershed would be degraded by installation of the plastic carpet.

Details of our specific concerns are below.

However, we would be remiss if we did not draw your attention to a set of issues that are likely to be front and center on the public policy agenda in the near future. The developer's proposal raises issues that may not be easily addressed under current regulations but are nonetheless critical to the protection of human health and watershed health. Scientists are starting to raise health concerns over the use of the PFAS family of chemicals in synthetic turf, including the "blades" of plastic grass and possibly the turf backing.¹ We have not seen studies of manufacturer SYNLawn's SYNTipede243 product and do not know if any exist, but, ***to protect the public, it is important that the Planning Board and County Executive obtain technical information from the firm about its use of any PFAS in its product.***

We are also very troubled about how limited publicly available information on the product proposed and product testing is, based on project filings on the Planning Board's website and information on the manufacturer's website (SYNLawn.com). Synthetic carpets are known to contain uniquely harmful constituents such as heavy metals in pigments, color stabilizers, UV inhibitors, plasticizers, non-stick chemicals, and flame retardant.

We all need to know what's in this product. To further clarify the risks to Sligo Creek and the watershed, we have requested technical information from the carpet's manufacturer (SYNLawn) and the manufacturer of the storm water management facility now in place under Ellsworth to protect Sligo Creek from Downtown Silver Spring runoff (Contech's StormFilter). We understand that SYNLawn will have proprietary concerns, but to understand public risks, we need better information.

Due diligence to protect Sligo Creek is also a responsibility of government. ***We strongly urge that the Planning Board and County Executive will step up their due diligence with the applicant, carpet manufacturer and DTSS storm water management facility manufacturer so that any decision can be based on sound science and risk assessment.***

¹According to recent studies, the artificial grass "blades" in synthetic turf may contain PFAS chemicals, known as "forever chemicals" (ie, they don't break down). PFAS chemicals are thought to be used to keep the plastic "blades" from sticking to the extrusion machinery. Some industry members have noted that they have no other cost effective process. PFAS chemicals also have been identified in certain products' backing. Researchers have called for firms to identify any PFAS used in the manufacturing of their turf product. For details on the science, see the February 2020 Fact Sheet on Per-and Poly-fluoroalkyl Substances (PFAS) in Artificial Turf Carpet by the well-respected TURI (Toxics Use Reduction Institute) at UMass Lowell; and recent work by PEER (Public Employees for Environmental Responsibility) and The Ecology Center. https://www.turi.org/TURI_Publications/TURI_Chemical_Fact_Sheets/PFAS_in_Artificial_Turf_Carpet; <https://www.peer.org/industry-in-a-dither-about-pfas-in-synthetic-turf/> SYNLawn products have not been tested in publicly available research, as far as we can tell, but until SYNLawn reassures the Planning Board and County, the PFAS question remains open. We should not give SYNLawn the benefit of the doubt.

In conclusion, we urge Foulger Pratt and the Planning Board to do no harm to our water or watershed. There are healthier and safer solutions for Ellsworth that can be adopted – without the risks involved. Why not choose healthier and safer solutions that protect Sligo Creek – and pose no potential risks and liability for the County?

Healthier and Safer Solutions to Protect Sligo Creek

- *The best solution to protect Sligo Creek would be to remove the asphalt and replace it with undergrading and permeable pavement (stone or concrete, no synthetics) on Ellsworth - not plastic turf.*

This solution would:

- (1) Protect the current Ellsworth storm water maintenance facility in place because it would not be burdened by the new plastics pollution load (it is probably not up to protecting Sligo Creek from the new plastics pollutants);
- (2) Lower the temperature of runoff into Sligo Creek (runoff from plastic is hotter; higher water temperatures kill aquatic life); and
- (3) Slow down storm water run-off (run off is faster on plastic surfaces; rapid runoff rates are degrading our stream and riparian buffers).

Permeable pavement would be an improvement over the current asphalt.

- *Another option would be to use a “green streets” concept to channel storm water runoff and then cover the remaining asphalt with durable wood planking. Asphalt could be removed in strategically placed areas on the sides and where utilities are not underneath, which could then serve as multiple mini-water retention and or infiltration sites. The remaining asphalt could be covered with durable wood planking or other stone or concrete paver material strategically designed to help to slow and route storm water run-off to mini-garden areas.*
- *A distant next best option might well be to leave the asphalt in place.*

Our concerns are set out in detail below.

Our Concerns.

We object to the installation of plastic carpet (and the particular plastic carpet proposed) on Ellsworth Drive on public safety, health, and environmental grounds:

1. **The plastic grass product proposed is substantially petroleum-based.** It is not “environmentally friendly”, contrary to representations by the manufacturer that some input materials are plant-based and the product is “Bio-based Synthetic

Turf”.² (See Appendix 1 for product details provided by the manufacturer.) Rather, the substantial petroleum content makes the product flammable, as the County’s Departments of Permitting Services and Transportation have recognized.³ **Montgomery County should not allow people to use and vehicles to drive on a flammable surface.**

2. Plastic carpets are known to many in the scientific community to contain hazardous chemicals related to higher cancer rates and disruption of human growth regulators, to name just a few very serious concerns. **Runoff containing these toxicants should not be allowed into Sligo Creek.**
3. **According to the manufacturer, the product proposed is not designed or certified for heavy foot traffic or the vehicular use that will occur on Ellsworth, a very busy and complex stretch of Downtown Silver Spring.**

The manufacturer recommends the product only for landscape, pets, play, rooftop, and golf. (See Appendix 2) Foulger Pratt proposes closing off Ellsworth to normal vehicle traffic so that only minimal access is allowed, but emergency vehicles, delivery trucks and weekly Farmers’ Market trucks would still be able to drive on it, according to its filings with the Planning Board. Any other option would be better: **plastic carpets are not up to or certified for the type of use proposed.**

4. **Bearing more weight and friction than the carpet was designed for, the plastic blades of grass and their synthetic backing can be expected to degrade even more rapidly than “normal”.⁴ By permitting this carpet to be installed, the Planning Board and County make it very likely that the degraded carpet will show up in Sligo Creek, in either particulate or dissolved chemical form.**
5. Storm water management filtration under Ellsworth is the main line of defense protecting Sligo Creek from pollutants coming down from DTSS. Keeping a filter cleared of sediment is critical, so how and how rapidly the carpet will degrade in

² The environmentally friendly features of the product SYNLawn’s SYNTipede 243 appear to be exaggerated. According to technical specifications on the product website, the synthetic grass blades are made of polyethylene and the turf backing is made out of polypropylene. Both are petroleum-based. SYNLawn’s proprietary coating of the carpet backing (Enviroloc) is described as containing “biobased resources including soybean oil”, but a closer look at the manufacturer’s description indicates that it, too, is heavily petroleum-based. See Appendix 1.

³ The County’s Department of Permitting Services has recognized the flammability hazard in its review of the proposal. See DAIC Document 81999002M-DPS-RPP.pdf. The Department of Transportation also opposes the use of synthetic turf on Ellsworth because it is flammable. See DAIC Document 91998005C. On its website, the manufacturer represents its products as having a Class A Fire Rating, but it is not at all clear how this rating was determined.

⁴ A widely accepted rule of thumb is that 5-10% of a plastic synturf carpet typically disintegrates off the carpet each year. On this basis, have the Planning Board and County Executive estimated the amount of plastic debris to be expected for the quantity of SYNTipede 243 plastic carpeting proposed? Keep in mind, this figure would need to be adjusted to reflect the fact that the product will likely deteriorate faster than “normal” because the product is not designed for the specific usage proposed. Also, because installation is unusual and does not appear to be recommended by the manufacturer (it is proposed to go on top of the asphalt), even more friction is likely to be generated, resulting in faster plastic deterioration.

combination with the design of Contech's StormFilter storm water management facility under Ellsworth are significant.

Because it was not designed for SYNLawn and has been in place since around 2005, we would not expect Contech's system to be up to the job.⁵ We are also concerned that the normal pre-plastic pollution operation of the system itself will likely be degraded by the additional pollution burden. Normal maintenance will not be enough.⁶

Furthermore, we do not know if the storm water runoff flow rate would change and how that would affect current the storm water facility. Typically, the flow rate for synthetic turf would be higher.

An additional critical question: how will Sligo Creek be protected from hotter storm water runoff? Outdoor plastic carpets typically heat up more than most other surfaces despite chemical treatment. Hotter storm water temperatures will kill life in Sligo Creek. Winter issues concerning anti-ice treatment are also important. Have the Planning Board and County determined that this storm water system can handle the new pollutant load in all weather?

We urge the Planning Department, the Department of Permitting Services, the Department of Environmental Protection and Montgomery Parks to investigate our concerns by requesting additional technical details and research from the applicant, SYNLawn and the designers of the current SWM system under Ellsworth.

Key information includes the particulate and chemical filtration capability of the SWM system now in place; the chemical and particulate size properties of how the plastic carpet/synthetic turf typically deteriorates; and the expected temperature of the carpet (average and peak) and how the storm water facility will handle this.

- 6. *Prior to a Planning Board decision on this proposal, we request that a thorough review of the storm water management situation be undertaken by the County in light of the concerns we have raised.*** While we understand that the applicant has represented the particular project would disturb less than 5,000

⁵ We are also trying to find out from DEP whether any special storm water protection was put in place for the several years that artificial turf was installed on what is now the ice rink area on Veterans' Plaza. It is important to note that the product used at the time was not the same product that is now proposed by the applicant and that the usage proposed did not involve any vehicular or similarly heavy foot traffic, for which the product was not designed. From what we can tell so far, there is no evidence that the StormFilter storm water maintenance facility was designed to handle the artificial turf that was installed at the time.

⁶ To evaluate whether the existing storm water facilities can handle the new pollution load, we have asked SYNLawn for information on how its product deteriorates, whether it degrades in chemical or particulate form and, if in particulate form, what size particles? We have also reached out to the manufacturer of the Ellsworth storm water facilities (Contech's StormFilter), designed to protect Sligo Creek from DTSS runoff, to find out what particulate size and chemicals its facilities are designed to handle. Preliminary guidance from Contech suggests that the product now in place is not what they now suggest to handle storm water runoff from artificial turf. While more frequent maintenance of the facility by DEP would help protect our Creek, it probably would not be enough.

square feet of surface area and therefore is exempt from storm water management requirements, we have not been able to confirm its calculations. ***We request confirmation from the County and Planning Board staff on the dimensions of the proposed carpet area.***

7. **The coronavirus situation raises additional public health questions about our ability to keep this product clean and whether our storm water management system in place under Ellsworth can handle relevant cleaning agents or anti-microbial technology.**⁷ Will the County have to close down part of Ellsworth because it is a health hazard, if we have a situation in the future similar to what we face now? It is important that SYNLawN will provide technical details about sanitization of its product and possible effects on water that can be evaluated by the County.

Conclusion. Plastic carpets used in outdoor public spaces pose major threats to our water and environmental quality. These threats are often unrecognized or unacknowledged, in part because technical product information may be proprietary and may not be available. As is often the case, the only way the public can know enough about the product in order to evaluate it is to buy a sample and have it tested.

Nonetheless, in this case, there is enough information on the product to raise large red flags about the public risks.

What is at stake? Sligo Creek is the focus of many of our communities. As the current quarantine situation clearly illustrates, people cherish Sligo Creek. People rely upon it and are active in improving - not harming – its water quality. Our wildlife depends on it. What goes into Sligo Creek ultimately ends up in the Chesapeake Bay and our drinking water. Our water is not protected from this type of plastic pollution.

We urge the Planning Board, County Executive, County Council and Foulger Pratt to “Do No Harm”. The Planning Board should deny this proposal to install synthetic turf carpeting on Ellsworth.

Please require installation of permeable pavement rather than plastic carpeting/synthetic turf to protect public health and safety, Sligo Creek and the watershed.

Thank you for your consideration.

Additional details documenting our concerns taken directly from the product manufacturer’s website are below.

⁷ According to a recent study published in correspondence to The New England Journal of Medicine, the current COVID19 virus can stay on plastic up to three days.

https://www.nejm.org/doi/full/10.1056/NEJMc2004973?query=featured_home

Sincerely,

Mike Smith, President, Friends of Sligo Creek

Kit Gage, Director of Advocacy, Friends of Sligo Creek
Advocacy@fosc.org

The Water Quality Committee, Friends of Sligo Creek
WaterQuality@fosc.org

cc: Adam Ortiz, Department of Environmental Protection
Hadi Mansouri, Acting Director, Department of Permitting Service
Christopher Conklin, Director, MCDOT
Mike Riley, Director, Montgomery Parks

Gwen Wright, Planning Director, Montgomery County Planning Board
Robert Kronenburg, Deputy Planning Director, Montgomery County Planning Board
Elza Hisel-McCoy, Chief, Area 1, Montgomery County Planning Board
Stephanie Dickel, Supervisor, Area 1, Montgomery County Planning Board
Grace Bogdan, Plan Coordinator, Area 1 (the reviewer of the proposal), Montgomery County Planning Board
Steve Shofar, Manager II, Intergovernmental Affairs Division, Department of Environmental Protection
Stan Edwards, Manager II, Energy, Climate and Compliance Division, Department of Environmental Protection
Pamela Parker, Stormwater BMP Maintenance and Inspection Program, Department of Environmental Protection
Mark.Etheridge, Manager, Water Resources Plan Review, Montgomery County, Department of Permitting Services
Atiq Panjshiri, Manager, Right-of-Way Review, Montgomery County Department of Permitting Services
Sam.Farhadi, Plan Reviewer, Right-of-Way Plan Review, Montgomery County, Department of Permitting Services
David Kuykendall, Plan Reviewer, Water Resources Plan Review, Montgomery County, Department of Permitting Services
Tim Cupples, Chief, Division of Transportation Engineering, Montgomery County Department of Transportation
Dan Sheridan, Chief, Transportation Planning and Design Section, Division of Transportation Engineering, Department of Transportation
Bill Hamilton, Supervisor, Natural Resources Stewardship, Montgomery Parks
Matt Harper, Supervisor, Resource Analysis, Montgomery Parks

APPENDIX 1

The plastic carpet proposed (SYNLawn's SYNTipede 243) is substantially petroleum-based, even though the manufacturer highlights materials described as plant-based and markets the product as "Bio-based Synthetic Turf". Because of the large petroleum content, it is flammable, as the County's Department of Permitting Services and Department of Transportation have recognized.

We have been able to document the petroleum-based content, in the manufacturer's own words.

Screenshots 1 – 3 below are pages from the manufacturer's website that list technical specifications for the plastic carpet proposed for Ellsworth Drive. Screenshots 1 and 2 document in the manufacturer's own words that the product's grass blades (called "yarns") and its primary backing are made of petroleum-based plastics:

- The artificial blades of grass are made of polyethylene (a thermoplastic polymer)
- The primary turf backing is polypropylene-based.

SYNLawn's claim that its plastic carpet is environmentally friendly and bio-based rests solely on the contents of its proprietary Enviroloc turf coating. (See Screenshots 1 and 3.) The company describes Enviroloc as replacing a "large portion of petroleum-based polymers (up to 60%) with bio-based polymers created from sustainable resources including soybean oil."

Taking the converse of SYNLawn's petroleum claim, at least 40% of polymers for the turf backing are petroleum-based. Without additional information, the actual percentage of petroleum-based polymers for coating of the backing is impossible to determine.

Similarly, there is not sufficient information to assess the description of soybean oil and other sustainable resource content. Scientifically, biopolymers are not necessarily benign. Many of these polymers have been designed to be environmentally persistent. Micro or nano particles from a persistent biopolymer may be just as hazardous as those from a synthetic polymer.

We urge the Planning Board and County Executive to request that SYNLawn provide additional technical information in support of its descriptions.

SCREENSHOT 1

Product Specifications for Syntipede 243 From Manufacturer Synlawn's Website:

- The backing and grass blades (referred to as “yarn”) are petroleum-based plastics. See also Screenshot 2.
- The manufacturer claims that the proprietary coating of its backing (Enviroloc) is “plant-based”.
- But more details provided by the manufacturer are not consistent with its plant-based claim. See Screenshot 3 below.

Grass Zone Yarn/Color	PE / Field Green / Apple
Grass Zone Denier	10,000 / 6
Thatch Zone Yarn/Color	PE / Field Green / Beige
Thatch Zone Denier	5,040 / 12
Grass Zone Yarn Shape	Omega
Finished Pile Height	1"
Finished Pile Weight	60 oz.
Backing	15 / 18 PP 2-Part / 20oz. EnviroLoc™
Tuft Gauge	3/8"
Total Weight	86 oz.
Tuft Blnd	> 8 lbs.
Permeability	> 300 inches per / SY
Features	Sanitized*, EnviroLoc™, StatBlock™ Anti-Static, DualChill™ IR Reflective, Deluster, UV Stabilizers
Test Data	ASTM F1292, F1951, IPEMA Certified

Unmatched Lifetime Warranty

EnviroLoc™ Plant-Based Backing

Deluster and UV Protection

Class A Fire Rating

Foot Traffic

Softness

SUPER YARN™ TECHNOLOGY

Sanitized* Antimicrobial DualChill™ IR Reflective StatBlock™ Anti-Static

Artificial Grass Fiber

Compacted Aggregate Base

Geotextile Weed Barrier

Learn more at CADdetails.com

Not to scale. For illustration only.

RECOMMENDED USES

LANDSCAPE — PETS — PLAY — ROOFTOP — GOLF

Source: <https://www.synlawn.com/wp-content/uploads/2019/12/SYNLawn-SYNTipede-243-ST243.pdf>, consulted April 7, 2020.

Screenshot 2: Additional SYNTipede 243 Petroleum-based Specifications from SYNLawn's Website

SYNLAWN® a sportgroup company		SYNTipede 243	
Primary Yarn Polymer	Polyethylene	Primary Backing	15/18 PP 2-Part
Yarn Cross Section	Omega	Coating Type	20 oz. EnviroLoc™
Standard Color	Field Green / Apple	PE Yarn Denier / Ends	10,000 / 6
Fabric Construction	Tufted	Texturized Thatch Denier / Ends	5,040 / 12
Second Yarn Polymer Thatch	Polyethylene	Warranty Period	Limited Lifetime
Secondary Yarn Color	Field Green / Beige		

Source: <https://www.synlawn.com/wp-content/uploads/2019/12/SYNLawn-SYNTipede-243-ST243.pdf>, consulted April 7, 2020.

Screenshot 3: How “Truly Green” is SYNTipede 243 ? SYNLawn's Website Describes its Proprietary Enviroloc Turf Coating

- The manufacturer claims that the proprietary coating of its backing (Enviroloc) is “plant-based”.
- The company describes Enviroloc as replacing a “large portion of petroleum-based polymers (up to 60%) with bio-based polymers created from sustainable resources including soybean oil.”
- Taking the converse of SYNLawn's petroleum claim, at least 40% of polymers for the turf backing are petroleum-based. Without additional information, the actual content is impossible to evaluate.

Truly 'green' technology.

SYNLawn's exclusive EnviroLoc™ Backing System is an environmentally-friendly, multi-layer component system that “locks” in durable turf fibers, thereby, extending the product's life cycle. Made in the USA, the EnviroLoc™ Backing System replaces a large portion of *petroleum*-based polymers (up to 60%) with *biobased* polymers created from sustainable resources including soybean oil.

The EnviroLoc™ Backing System uses a durable 2-part woven Polypropylene backing fabric constructed to lock in tufted grass fibers. After tufting, the backing fabric and stitched grass fibers receive a thick layer of SYNLawn's proprietary biobased EnviroLoc™ coating. Together, these components provide a sturdy anchor for fibers creating less “shedding” as well as create an environmentally responsible approach to synthetic grass.

Source: <https://www.synlawn.com/enviroloc-backing-system/>, consulted April 7, 2020.

APPENDIX 2

Plastic carpet/synthetic turf is the wrong thing to install on Ellsworth Drive. SYNLawn's products are not designed for the type of usage that will occur if the proposal goes through.

As Screenshot 4 (below) from the website documents, the manufacturer recommends the product only for landscape, pets, play, rooftop, and golf. It is not designed for the very heavy foot traffic or vehicular use that will occur on Ellsworth Drive.

Foulger Pratt proposes closing off Ellsworth to normal vehicle traffic, but emergency vehicles, delivery trucks and weekly Farmers' Market trucks would still be able to drive on it.

No substitute would be any better: plastic carpets are not up to or certified for the type of use proposed.

Note also that the listed certifications are not relevant for the use proposed.

Screenshot 4: Recommended uses of SYNLawn's SYNTipede 243 are for "landscape, pets, play, rooftop and golf", according to the manufacturer

Grass Zone Yarn/Color	PE / Field Green / Apple
Grass Zone Denier	10,000 / 6
Thatch Zone Yarn/Color	PE / Field Green / Beige
Thatch Zone Denier	5,040 / 12
Grass Zone Yarn Shape	Omega
Finished Pile Height	1"
Finished Pile Weight	60 oz.
Backing	15 / 18 PP 2-Part / 20oz. EnviroLoc™
Tuft Gauge	3/8"
Total Weight	86 oz.
Tuft Blnd	> 8 lbs.
Permeability	> 300 inches per / SY
Features	Sanitized*, EnviroLoc™, StatBlock™ Anti-Static, DualChill™ IR Reflective, Deluster, UV Stabilizers
Test Data	ASTM F1292, F1951, IPEMA Certified

- Unmatched Lifetime Warranty
- EnviroLoc™ Plant-Based Backing
- Deluster and UV Protection
- Class A Fire Rating

Foot Traffic

Softness

SUPER YARN™ TECHNOLOGY

Sanitized*
Antimicrobial

DualChill™
IR Reflective

StatBlock™
Anti-Static

Artificial Grass Fiber

Compacted Aggregate Base

Geotextile Weed Barrier

SYNLAWN

Learn more at CADdetails.com

Not to scale. For illustration only.

RECOMMENDED USES

LANDSCAPE

PETS

PLAY

ROOFTOP

GOLF

Source: <https://www.synlawn.com/wp-content/uploads/2019/12/SYNLawn-SYNTipede-243-ST243.pdf>, consulted April 7, 2020.

From: [Catherine Vanderwaart](#)
To: [MCP-Chair](#)
Subject: DTSS Ellsworth Drive Plastic Turf Proposal
Date: Wednesday, June 17, 2020 11:23:17 AM

Dear Planning Board,

As you consider the proposal to update the downtown Silver Spring area and install plastic turf, I hope the Board has considered that a major use of that space in the time I've lived nearby has been by skateboarders, who are mostly young men of color. Have you heard from them about how they feel about the proposal?

As we've all witnessed protests around the country around police brutality, I've seen a number of important planning questions raised up, in particular the question of "whose streets?" Who do we design public space for, who feels safe in that space, who is driven out of public spaces by private security or police officers, whose needs is the space designed around? The Ellsworth Drive turf proposal seems designed to make the space more attractive to relatively high-income families like mine at the expense of young men of color, which is not how we should be designing public spaces.

I'm a white woman in my late 30's who lives a few blocks away and has never been on a skateboard in her life. I do not know what the people who skateboard on Ellsworth Drive want downtown Silver Spring to look like and cannot speak on their behalf as to the merits of the turf proposal, though it seems almost intentionally designed to drive them away. But I hope the Planning Board takes their needs seriously and makes a commitment to finding a way to engage them in the planning process, going beyond the standard public notices to really engage a group that is not particularly likely to show up to a public meeting.

If it's too late to design space for skateboarding along a permanently pedestrianized Ellsworth Drive, I hope the Board will commit to meaningfully engage the young men who skateboard in the streets in the forthcoming downtown Silver Spring master planning process, and to ensuring that they remain welcome in the public spaces in the community.

Thank you,
Catherine

Catherine Vanderwaart
Ellsworth Drive
Silver Spring

From: [Avorce](#)
To: [MCP-Chair](#)
Subject: Testimony for June 18 Hearing Item 5, DTSS 81999002M and 91998005C
Date: Wednesday, June 17, 2020 11:56:45 AM
Attachments: [6-18-20 Testimony before the Montgomery County Planning Board.docx](#)

Please find my attached testimony for tomorrow's Planning Board hearing on Downtown Silver Spring.

Thank you.

Anne Vorce
618 Bennington Drive
Silver Spring, Md 20910

Anne Vorce, Testimony before the Montgomery County Planning Board

Subject: the Proposal by Foulger Pratt and the Peterson Company to Install Plastic Carpet on Ellsworth Drive in Downtown Silver Spring, Item 5, Planning Board Meeting, June 18, 2020

Project Plan Amendment 91998005C; Site Plan Amendment 81999002M

Good morning, Chair Anderson and other Members of the Planning Board.

My name is Anne Vorce. I am a resident of the Seven Oaks-Evanswood Neighborhood. I am an active steward of water quality and the environment, primarily through our watershed group, the Friends of Sligo Creek.

Our neighborhood has the best of both worlds: we are near downtown Silver Spring, but we are also near Sligo Creek and its Bennington Tributary. Downtown Silver Spring drains into and affects Sligo Creek via the Bennington Tributary.

As a local resident, I enthusiastically welcome what Foulger Pratt and Peterson are proposing to refresh Downtown Silver Spring. They have already made it into a lively and fun destination which has exceeded everyone's expectations.

But I welcome their proposal with one notable exception. It would be a serious mistake to install plastic carpet/synthetic turf on Ellsworth.

I am testifying to urge that the Planning Board (plus County Executive and County Council) reject the Foulger Pratt and Peterson proposal for plastic carpet/synthetic turf.

The Planning Department staff recommends that "[t]he Certified Site Plan must include an alternative design for Ellsworth Drive without synthetic turf, to be implemented if the County Council does not approve Abandonment Application No. AB-771." (p.2) While this would be a very positive step indeed, it is not enough. The Ellsworth synthetic turf proposal should be completely taken off the table and not be a part of its Abandonment Application.

I am also testifying to urge the applicants to turn to a safer and more environmentally friendly solution for Ellsworth Drive. There are solutions out there that are attractive and could help enliven Downtown Silver Spring – without harming anyone or anything. I am sure that the County and our watershed groups would work closely with them.

So what's so bad about the plastic carpet/synthetic turf idea?

- ***SYNLawn's product SYNTipede 343 is flammable.***

Like every other plastic carpet/synthetic turf on the market, SYNTipede 343's petroleum-based content is considerable. According to SYNLawn's website, its artificial grass blades are made of polyethylene (a thermoplastic polymer) and the primary turf backing is polypropylene-based. It is difficult to understand how the manufacturer can call the product "plant-based and Bio-based Synthetic Turf", although there appears to be some plant-based and bio content.

It is my understanding that a reviewer from the County's Department of Permitting Services has assessed the synthetic turf product as flammable.

How can the Planning Board approve the use of a product that is flammable in an area which is typically full of people and which drains into Sligo Creek?

- *The Ellsworth plastic carpet will be a lot hotter than the current asphalt, with the applicant estimate at least 10 degrees hotter.*

It is surprising that we don't know precisely how much hotter SYNTipede 343 would be than the current asphalt surface on Ellsworth from the applicant or the manufacturer, other than a "guess" from a consultant for the applicant. In a document provided to the Planning Board, the consultant said he did not know what the temperature of the synthetic turf would be, but "guessed" 10 degrees warmer. This is hot ! It will very unpleasant for people wanting to be in DTSS (including any farmers from the Farmers Market trying to maintain their fresh produce). As for Sligo Creek, hotter water temperatures will kill aquatic life.

Furthermore, please note that the applicant has not provided a "heat" map to the Planning Board staff to address this concern. What is posted online by the staff is a relative shade map – not a heat map. And the readings are from one day. Perhaps the relative shade map was based on underlying heat data that could be produced. (Plus, July 15, 2019 appears to have been relatively cool for a summer day and fairly shaded, based on a weather history source.)

- *SYNTipede 343 is not designed or certified for the usage proposed for Ellsworth Drive. This will have implications for wear and tear and pollution.*

According to the manufacturer, the product is recommended only for landscape, pets, play, rooftop, and golf. The applicant has not provided any information that demonstrates how the carpet would hold up from the heavy foot traffic, emergency vehicle and delivery truck use that will likely take place. None of SYNLawn's products are rated for the usage that will take place.

However, the applicant's consultant VIKA has described the artificial turf as "vehicular rated", in its May 13 letter to Marie LaBaw of DPS. (See Attachment D, in the Attachments posted along with the Planning Board's Agenda) As far as I can tell, there is nothing on the company or product website SYNLawn.com or in the documents provided to the Planning Board that substantiates this claim.

Perhaps in recognition of staff concern about the fragility and durability of the plastic carpet, a recommendation is that any vehicles drive slowly on Ellsworth.

- *Because we still don't know how the plastic carpet will deteriorate, we don't know likely effects on people using Ellsworth or on Sligo Creek from runoff.*

I am very encouraged by the work that DEP has done to evaluate the effectiveness of its storm water management systems to stop deteriorating artificial turf from getting into our waterways. I personally welcome building upon that work. And the regular maintenance of those systems is so important and I welcome their commitment here.

However, there is a critical limit on their assessments. DEP has no funding for chemical tests – and this testing is critical. How SYNTipede 343 degrades chemically is crucial information for the Planning Board to assess the safety of this product for people and our waterways. It is also important to know how SYNTipede 343 deteriorates materially – that is, what are the size of any particles – and can they be handled by the systems under Ellsworth that protect Sligo Creek ? What size particles can they handle ?

It would not be surprising if the plastic carpet deteriorated even faster than normal, given the extreme “off-label” use being proposed. I remain very worried that Sligo Creek will not be sufficiently protected.

My worries grow when I read the Safety Data Sheet of the adhesive proposed to glue the carpet to the asphalt. I was not at all reassured when I saw warnings in the SDS about the toxicity to water and caution that it should not go into storm drains.

I became even more concerned when I read what was actually recommended in the Care and Maintenance Manual. This Manual will be the contractual basis for what is expected from the applicants to keep up the turf. For example, dry cleaning fluid and mineral spirits are recommended to clean vehicular fluids. How will these substances be kept away from people and our Creek ?

I encourage Members of the Planning Board to carefully read the Care and Maintenance Manual and Safety Data Sheet provided by the applicants. It is discouraging reading.

- *I was not able to confirm many of SYNLawn’s broad certification claims, which looked impressive at a glance.* Has the County of Planning Board done a due diligence memos on the certification claims?

I can confirm that its certifications are for playgrounds, carpeting -presumably not with vehicles driving on it - and roofing fire rating. I do not understand the references to the EPA and CPSC. While it appears that SYNTipede 343 might contain some bio-products, I could not substantiate the company claim that the product was a green product.

- Finally, I and many others are very worried that the SYNLawn products contain PFAS. SYNLawn has provided no information. The world has too much plastic – even plastic dust clouds are now reported in studies to be circulating in our atmosphere. A recent study documents it even in our wildest parks. Don’t we have enough plastic in our environment – including our land fills?

In conclusion, I urge you to reject the Ellsworth plastic carpet proposal and to urge the applicant to adopt an environmentally friendly solution instead.

Thank you for your consideration.

Anne Vorce

From: [Kathleen Michels](#)
To: [MCP-Chair](#); county.council@montgomerycountymd.gov; [Ortiz, Adam](#)
Cc: [Kathleen Michels](#)
Subject: Re: Foulger-Pratt proposal for plastic carpet on Ellsworth Drive: Please deny
Date: Wednesday, June 17, 2020 12:26:15 PM
Attachments: [Long Island Sierra Club anti-synturf graphic.webp](#)

Dear Chairperson Anderson and Planning Board Members

Re: Project Plan No. 91998005C and Site Plan No. 81999002M

Foulger-Pratt proposal to install plastic carpet on Ellsworth Drive, Downtown Silver Spring, Montgomery County Planning Board hearing, June 18, 2020

I would like to oppose the application of a plastic carpet to Ellsworth Ave or elsewhere and support the concerns raised by the community and Friends of Sligo Creek, Neighbors of Northwest Branch and others in the community. I would also like to raise some additional and very basic concerns.

I find the county over-sight of the artificial turf part of this application for Ellsworth avenue disturbingly lacking in a number of ways. First the assumption from the start seems to be that synthetic turf is an appropriate material for a busy pedestrian plaza, a plaza which will also allow weekly vehicle access for a farmers market. No rationale is given and no questions are raised on why GLUING a PLASTIC shag carpet to an asphalt road is better in any way than leaving it as asphalt. Aesthetics perhaps but that is not even addressed. There are other solutions to address aesthetics. The problems introduced by such a microplastic-shedding and chemical-leaching, waste-generating plastic carpet that is always hotter than asphalt are only minimally addressed and never effectively resolved. For example - flame retardant chemicals added to plastics are harmful to people and the environment and should not be allowed for such a use. However the applicants are not asked to address the chemicals added to the synlawn synthetic turf to make it (arguably and toxically) flame resistant. Other chemicals such as PFAS "forever chemicals" that the industry acknowledges are used in synthetic turf carpet manufacturing are also not addressed. This is just one of many details important for health and safety of people and the environment that are not pursued. Any of these problems are enough to cause denial especially when no overwhelming benefits are stated and justified. To be clear there ARE NO applicable EPA or related guidelines for heat, chemicals or pollution from these surfaces so for them to say they meet such guidelines makes no sense except to give a false sense of security.

I don't have time right now to go again into all the issues and more that are detailed by FOSC and NNWB but I urge you to turn down the synthetic turf part of this application and urge the applicants to keep it as is or use natural or otherwise durable naturally sourced materials such as stone, wood, etc.

Please see attached and also see:

www.sierraclub.org/maryland/synthetic-turf

www.safehealthyplayingfields.org

for some more information.

Kathleen Michels, PhD
michelskm2016@gmail.com
301-922-3816

On Wed, Jun 17, 2020 at 11:16 AM Anne Ambler <anambler@gmail.com> wrote:

**Re: Project Plan No. 91998005C and Site Plan No. 81999002M
Foulger-Pratt proposal to install plastic carpet on Ellsworth Drive, Downtown
Silver Spring, Montgomery County Planning Board hearing, June 18, 2020**

Dear Chairman Anderson:

On behalf of the Neighbors of the Northwest Branch (NNWB), I urge you and the Planning Board not to approve the plan by Foulger-Pratt to carpet Ellsworth Drive with artificial turf. The NNWB, an all-volunteer nonprofit organization with members in Montgomery and Prince George's counties, is dedicated to the ecological restoration of the Northwest Branch of the Anacostia River. Since Sligo Creek is a major tributary of the Northwest Branch, what flows into Sligo Creek makes its way to the Northwest Branch. Plastic pollution, whether large pieces or microplastics, is already a problem in our waterways. New research shows that microplastics are even in the wind (<https://www.scientificamerican.com/article/microplastics-are-blowing-in-the-wind/>) and the rain (<https://earthsky.org/earth/rain-microplastic-rocky-mountains-colorado>). It makes no sense to add to global pollution by coating a street with this substance. We strongly support the arguments in the excellent letter you received from Friends of Sligo Creek dated April 20, 2020 (attached).

Montgomery County claims to be environmentally progressive. Now that we know much more about how widespread and harmful plastic pollution is, this county needs to act responsibly on that information and *reduce, not increase*, sources of environmental plastic contamination.

Thank you for the opportunity to comment.

Anne Ambler
Advocacy Chair



P.O. Box 4314
Silver Spring, MD 20914

Synthetic Turf Sports Fields

Did you know:

The infill is made from ground-up tires.
It exposes our children to these chemicals...

PHENOL ACETONE CHROMIUM
PAHS MANGANESE BENZENE
BENZOTHAZOLE CARBON BLACK
AMINES METHYLETHYL KETONE



CADMIUM LEAD MERCURY
ARSENIC BARIUM ACETONE
NICKEL CHLOROETHANE
TOLUENE VOCs MORPHOLINE

Our children inhale and ingest the infill.
The infill gets washed into our bays and waterways.

Learn more about the human and environmental cost of synthetic turf @
www.grassroots.org/syntheticurf.php

 **SIERRA
CLUB**
Long Island Group

ToxicTurf

GIANT HEAT ISLANDS

GETS HOTTER THAN ASPHALT!

HOT CARPETS

brand plastic fields

INFERIOR ATHLETIC FIELDS

with waste tire crumb and
shedding microplastic

DANGEROUS TEMPERATURES
EXCESSIVE GMAX
MRSA & Staph
OUTRAGEOUSLY EXPENSIVE

Lead PFAS PAHs



*New
untested
infill*

**Dump it in a pile when
you're done and pretend
you recycled**

**100%
FAKE
Grass**

Now with extra injuries!

Net weight 40,000 lbs

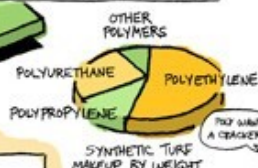
LIFECYCLE OPTIONS OF SYNTHETIC TURF

SYNTHETIC TURF FIELDS HAVE AN AVERAGE LIFESPAN OF

10 YEARS

THE AVERAGE SYNTHETIC TURF FIELD IS **76,800 SQUARE FEET**.

... SO WHAT HAPPENS TO THE OLD FIELDS? ONE OF **FOUR** THINGS:



1



THIS IS BY FAR WHAT HAPPENS TO MOST SYNTHETIC TURF FIELDS. ON AVERAGE, ONE FIELD WEIGHS **42,778 LBS.** AND THE INFILL WEIGHS **422,400 LBS.**

TOGETHER, THAT'S THE SAME AMOUNT OF ANNUAL WASTE PRODUCED BY **267** AMERICANS.

2

BETWEEN 2014 & 2018, AN ESTIMATED 4,356 SYNTHETIC TURF FIELDS WILL NEED TO BE REPLACED.

THE TURF IS INCINERATED TO PRODUCE ELECTRICITY OR STEAM.

TO

ENERGY



HOWEVER... THIS PROCESS PRODUCES **113 TONS** OF eCO_2

3



THE FIELD IS CAREFULLY REMOVED AND REUSED SOMEWHERE ELSE, LIKE A BATTING CAGE.

UNFORTUNATELY, STUDIES SHOW NO MATTER HOW MANY TIMES THE FIELD IS REPURPOSED, IT WILL INEVITABLY END UP IN THE LANDFILL.

4

RECYCLE



BY RECYCLING THE FIELD, IT BECOMES A NEW **RAW MATERIAL** READY TO BE MADE INTO A LIMITLESS NUMBER OF THINGS.

SO WHY DOESN'T EVERYONE RECYCLE?

THERE ARE VERY FEW FACILITIES THAT CAN RECYCLE TURF. IN ADDITION, THE OLD FIELD MUST BE REMOVED BY SPECIALIZED EQUIPMENT AND PROPERLY SEPARATED, OR IT CANNOT BE RECYCLED.

PRESENTED BY



WWW.RECYCLEMYTURF.COM

RECYCLING ALSO SAVES **143 BARRELS** OF CRUDE OIL.

Health Concerns

- Exposure to Toxins
 - Acute: Respiratory and Mucous Membrane Irritation
 - Chronic: Cancer and Neurotoxicity
- Excessive Heat
 - Dehydration
 - Heat Exhaustion
 - Burns
- 'Turf Burns' and MRSA Risk
 - CDC reported turf burns as a risk factor for MRSA infection in football players (MMWR August 22, 2003 / 52(33);793-795)
 - CDC reports cluster of MRSA infections in LA Rams Pro football players all associated with 'turf burns. (NEJM 2005 Kazakova et al.)

Mount
Sinai

Children's
Environmental
Health Center

From: [Bogdan, Grace](#)
To: [Coello, Catherine](#)
Subject: FW: Support Letters for Downtown Silver Spring
Date: Wednesday, June 17, 2020 2:57:21 PM
Attachments: [image001.png](#)
[image002.png](#)
[image005.png](#)
[image006.png](#)
[SSUDAC PlanAmendmentsLetterSigned.pdf](#)
[Downtown Silver Spring Redevelopment - Support.pdf](#)

Hi Catherine,

Sorry to bug you so late in the day before PB, but my Applicant wanted to confirm these letters were in related correspondence to Item 5 on tomorrows agenda? It is the first time I am seeing them but they are dated October 2019. Weird!

Grace

From: Sears, Barbara A. <bsears@MilesStockbridge.com>
Sent: Wednesday, June 17, 2020 2:52 PM
To: Bogdan, Grace <grace.bogdan@montgomeryplanning.org>
Cc: 'Kelly M. Price' <Kprice@Petersoncos.com>
Subject: Support Letters for Downtown Silver Spring

Hi Grace-

I wanted to make sure you had these letters of support from the Urban District Advisory Committee and the Greater Silver Spring Chamber of Commerce. One was addressed to the Planning Board and the other to the County Council with a copy to the Board. However, since they were both sent some time ago, I'd like to check that the Planning Board received them and they were made part of the record.

Thank you.

Barbara

Barbara A. Sears

11 N. Washington Street | Suite 700 | Rockville, MD 20850-4229
D: +1 301.517.4812 | O: +1 301.762.1600 | F: +1 301.517.4812



[vCard](#) | bsears@milesstockbridge.com



For COVID-19 information and resources, please visit our [Coronavirus Task Force page](#).

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SILVER SPRING URBAN DISTRICT ADVISORY COMMITTEE

October 29, 2019

County Council
Council Office Building
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Re: Plan Amendments to Downtown Silver Spring

At the September 19, 2019 meeting of the Silver Spring Urban District Advisory Committee, representatives of the Peterson Companies and Foulger-Pratt presented their proposed project plan and site plan amendments to the Downtown Silver Spring project. The Urban District Advisory Committee wishes to express its enthusiastic support of these amendments. The amendments serve to enhance this important and prominent part of Silver Spring, which is now approximately 18 years old. The improvements will encourage people to come to Silver Spring, spend enjoyable time in the Downtown, and patronize Silver Spring businesses. It helps Silver Spring stay competitive by providing an attractive and enjoyable place to live, visit, recreate and do business.

The Urban District Advisory Committee endorses the project as a very appropriate response to changing forces in the marketplace by keeping current with these changes. In summary, the amendments will promote more flexible amenity spaces and an attractive and exciting place that people will enjoy, walk, shop, and spend time in a comfortable and fun location.

We encourage the Planning Board to approve the changes and look forward to seeing them implemented in Downtown Silver Spring.

Very truly yours,

SILVER SPRING URBAN
DISTRICT ADVISORY COMMITTEE

By: 
SS Urban District Committee Chairman

cc: County Executive Marc Elrich
County Planning Board



OUR MISSION:

Working to enhance the economic prosperity of greater Silver Spring through robust promotion of our member businesses and unrelenting advocacy on their behalf.

October 16, 2019

Casey Anderson, Chair
and Members of the Montgomery County Planning Board
Maryland-National Capital Park and Planning Commission
8787 Georgia Avenue
Silver Spring, MD 20910

Re: Plan Amendments to Downtown Silver Spring

Dear Chairman Anderson and Members of the Planning Board:

On behalf of the leadership of the Greater Silver Spring Chamber of Commerce, I am writing to express enthusiastic support for the proposed project plan and site plan amendments to Downtown Silver Spring.

At the September 26, 2019 meeting of our Economic Development Committee, representatives of the Peterson Companies and Foulger-Pratt presented their proposed amendments to the Downtown Silver Spring project, surprisingly, now about 18 years old. Based on this presentation, we believe that the proposed refresh is an appropriate and welcome response to changing forces in the marketplace, forces that demand a more vibrant and exciting environment that supports patrons' desires for a destination where they can walk, shop, and simply spend time.

We believe that the changes proposed will only enhance this important and prominent attraction in Silver Spring. Specifically, opening up the entrance at the corner of Colesville Road and Georgia Avenue will create a more welcoming environment that will draw people into Downtown Silver Spring. The improvements and enhancements along Ellsworth Drive will create an environment that will give Silver Spring visitors an attractive place to not only shop and enjoy a meal, but also relax, enjoy the surrounding artwork and "green" spaces, socialize, or enjoy a concert or other small performance. We especially like the flexibility provided by the new design of the amenity space. Altogether, the proposed changes will make this centerpiece of Silver Spring's past redevelopment an even more attractive destination that will draw patrons to Silver Spring for more years to come.

We encourage the Planning Board to approve the proposed changes and look forward to seeing them come to life in Downtown Silver Spring.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jane Redicker".

Jane Redicker
President & CEO