

## **Combined Statement of Justification**

### **Sketch Plan No. 320210040 and Site Plan No. 820210060** **8808 and 8830 Cameron Street**

### **United Therapeutics Project 242T**

#### **I. INTRODUCTION AND PROPERTY DESCRIPTION**

The Applicant, United Therapeutics Corporation (the “Company,” or “UT”), requests approval of a Sketch Plan Application and a Site Plan Application that includes an Adequate Public Facilities approval (the “Applications”) for the approximately 69,787 square foot property (gross tract area) located generally in the northwest quadrant of the intersection of Spring Street and Cameron Street, at 8808 Cameron Street, and 8830 Cameron Street in Silver Spring, Maryland; of which approximately 35,542 square feet of the property (gross tract area) is zoned EOF-3.0, H-100 and is the limit of the Sketch Plan Application. For purposes of this Statement, Spring Street is considered to be oriented east/west, and Cameron Street is considered to be oriented north/south. The property at 8808 Cameron is zoned EOF-3.0, H-100 (Employment Office) and the property at 8830 Cameron is split-zoned EOF-3.0, H-100 and R-60 (Residential) (collectively, the “Property”). The Property currently consists of two record lots that will be consolidated into one lot to accommodate the proposed project, as described below. The Property is located in the block immediately to the north of the Silver Spring Central Business District (“CBD”). The Property is within the boundaries of the North and West Silver Spring Master Plan (2000) (the “Master Plan” or “Plan”) and the Silver Spring Parking Lot District (“PLD”). The proposed project has been designated as a Strategic Economic Development Project (Executive Order No. 141-20, effective date December 15, 2020).

The Applicant submits: (1) the Sketch Plan Application in accordance with the optional method of development procedures of Section 59.7.3.3 of the Montgomery County Code (2014, as amended); and (2) the Site Plan Application under Section 59.7.3.4 of the Montgomery County Code (2014, as amended) (hereinafter, Chapter 59 is referred to as the “Zoning Ordinance”). As a part of the Site Plan Application, the Applicant is also submitting an Application for approval of adequate public facilities (“APF”) under Section 8-31 of the Montgomery County Code and Section 59.7.3.4.E.2.h of the Zoning Ordinance. The Applicant proposes to develop the Property with a medical/scientific, single use building containing approximately 65,000 square feet of gross floor area (the “Project” or “Project 242T”). The Project will be constructed on one consolidated record lot. The Project is described in detail below.

As described more fully herein, the Project will replace two older office buildings with a modern, architecturally interesting, medical/scientific building in conformance with the Commercial Residential and Employment Zones Incentive Density Implementation Guidelines (“Guidelines”). The Project will visually improve this area of Silver Spring with a state of the art medical/scientific building, environmentally friendly elements, and updated landscaping and lighting. In addition, Project 242T will bring a total of approximately 155 new employees to downtown Silver Spring to support the local businesses, public transportation system, and additional companies to locate nearby. The Project recently received designation as a Strategic

Economic Development Project from County Executive Marc Elrich (Executive Order No. 141-20, 12/15/2020). A copy of the Executive Order is included in the Appendix to this Statement.

## **II. PROJECT 242T**

Project 242T will be a significant development project, both scientifically and economically. The Project will replace two outdated office buildings located on the Property with a modern, state of the art, medical/scientific production facility. Project 242T will continue the Company's long tradition of developing therapies for people who suffer -- many of whom eventually die -- from chronic lung diseases. In simple terms, Project 242T aims to address the acute national shortage of transplantable lungs by producing personalized lungs from a future recipient's own cells. The Project 242T facility will produce the personalized lungs that will be used to support the clinical trial studies required by the U.S. Food and Drug Administration ("FDA") to prove their safety and efficacy.

## **III. SITE VICINITY**

The Property is bounded on the north (beyond the surface parking lot zoned R-60) by single-family homes in the R-60 zone along Noyes Drive. To the south of the Property at 1101 Spring Street is a property also zoned EOF-3.0, H-100, improved with a medical/scientific building that houses the production facility for the United Therapeutics' Unituxen, approved for the treatment of children diagnosed with pediatric neuroblastoma, the deadliest pediatric cancer. To the west of the Property is a parcel containing the parking lot area for the residential townhouses located further to the west and fronting Fairview Road. The townhouses and the parking lot parcel are zoned RT-12.5 (Residential Townhouses). Also to the west of part of the Property are commercial townhouses zoned EOF-3.0, H-100.

To the east of the Property is the Cameron Street cul-de-sac. To the east of the cul-de-sac is a split-zoned property located at 1015 Spring Street, owned by United Therapeutics. The northern portion of the 1015 Spring Street site east of the cul-de-sac is zoned R-60 and is the playground and associated warming hut used by the children in the day care center owned by United Therapeutics. The southern portion of the site east of the cul-de-sac is zoned EOF-3.0, H-100 and is improved with a three-story building that houses the United Therapeutics lung bio-engineering facility. Further to the east is the 11-story Cole Spring Plaza Apartment building.

To the south across Spring Street is the main United Therapeutics Campus, consisting of: (1) two office buildings (one on either side of the intersection of Spring Street and Cameron Street) that are joined by a building connector that spans Cameron Street at the 6th floors; (2) a laboratory building along the east side of Cameron Street attached to one of the office buildings; and (3) the "Unisphere," a site net-zero office building, the most recent addition to the Campus, at the intersection of Spring Street and Colesville Road.

## **IV. SITE ANALYSIS**

### **A. Existing structures**

The Property is currently improved with one six-story and one two-story medical office buildings, and associated off-street parking lot containing 88 parking spaces.

## **B. Slopes on Property**

The Property is located on a high point with gentle slopes from the middle of the north curb of the parking lot and generally slopes to both the southwest, toward the parcel containing the parking lot located adjacent to the residential townhouses, and southeast toward the Cameron Street cul-de-sac.

## **C. Existing access points (vehicular/pedestrian)**

The Property is served by one vehicular access point located at the north end of the Cameron Street cul-de-sac. The Property is served by pedestrian access to the site from the Cameron Street public right-of-way, as well as from Noyes Drive via a private pathway, installed by the Applicant, leading south along the eastern property line to the Cameron Street cul-de-sac.

## **D. Environmental**

The Property is located in the Anacostia Watershed and does not contain any perennial or intermittent streams or their associated buffers. There are no wetlands. There are no records of rare, threatened or endangered species on the Property, and none were observed during field work for the NRI/FSD or the review by the MDNR Wildlife Heritage Service, per the environmental letter dated November 19, 2020. There are no existing champion trees or existing forest on the Property. Based on the NRI/FSD approved on December 16, 2020, a Final Forest Conservation Plan is being submitted as a part of the Site Plan Application package.

## **V. PREVIOUS APPROVALS**

### **A. Maryland-National Capital Park and Planning Commission (“M-NCPPC”)**

To the best of the Applicant’s knowledge and belief, there are no previous approvals from M-NCPPC for the Property.

### **B. Board of Appeals**

The Board of Appeals granted a special exception in 1967 (Case No. CBA-2164) to the then owner of the R-60 zoned portion of the Property for “off-street parking in connection with a commercial use” (i.e., the office building at 8830 Cameron Street). The special exception was ultimately transferred to United Therapeutics in 2011 and continues to be used for off-street parking in connection with a commercial use.

## **VI. DESCRIPTION OF PROPOSAL**

### **A. Building and Site Design**

The proposed building will be six stories tall, plus a mechanical penthouse and cellar. Four floors will be fit out with cleanroom production space, supporting labs and storage. Two floors will be interstitial building support equipment floors. Access points are located along the east facade, including the main entrance, an at-grade loading dock, and a fire command center. A ramp down to a cellar-level dock door is located at the south side of the building. Two emergency

generators and three microbulk tanks will be located on the north side of the building within a screened enclosure.

The building will be clad in metal panel, curtainwall, and louvers. The roof will be white PVC; a green roof will be installed over the mechanical penthouse roof. A solar array will be located on a portion of the main roof. Stormwater will be collected and reused for toilet flushing and irrigation. Geoexchange wells will be located under the parking lot to contribute to heating and cooling the interstitial mechanical floors.

The site is designed for several functions, including building support equipment, employee parking, stormwater management, and geoexchange wells. Natural elements will surround these functional components: rain gardens and bioboxes are located in multiple locations, trees and shrubs border the hardscaping, creating a natural visual buffer between the commercial development and adjacent residential neighborhoods. The re-development with Project 242T will increase the number of trees located on this Property.

The design of the building and the site are discussed in more detail on pp. 14-15 of this Statement.

#### **B. Public Open Space (if any required)**

No public open space is required under Section 59.4.6.4.B.1 of the Zoning Ordinance for a proposed development on a site that has a tract area of one acre or less and only one right-of-way frontage.

### **VII. ADEQUATE PUBLIC FACILITIES**

The Adequate Public Facilities information is being submitted as a part of the Site Plan Application, in accordance with Section 8-31 of the Code and Section 59.7.3.4.E.2.h of the Zoning Ordinance.

According to the Traffic Study Scoping Form prepared by Kimley-Horn, the proposed use will generate 86 and 94 person trips during the AM and PM peak hours, respectively. Vehicle trips will account for 55 and 60 of those person trips in the AM and PM peak hours, respectively. The remaining person trips will consist of transit, bicycle, and pedestrian trips. This trip generation estimate is conservative as it is based on a building size as analyzed of up to 106,000 square feet of gross floor area, which is the maximum allowable square footage of the building and is, in fact, much larger than the actual Project, as planned. In addition, due to the planned timing of demolition of the existing buildings on the Property, the Applicant is not taking advantage of offsetting credits for the trips associated with the existing buildings that are being removed. These existing buildings would generate 197 AM and 229 PM peak hour person trips. Vehicle trips will account for 124 and 144 of those person trips in the AM and PM peak hours, respectively. These trips being removed exceed those trips being generated by the Project.

The County Council has included a provision in the 2020-2024 revision to the Subdivision Staging Policy (now “Growth and Infrastructure Policy”) that temporarily exempts bioscience from Local Area Transportation Review (“LATR”) under certain circumstances. This Project qualifies for the exemption. Therefore, an LATR study will not be prepared.

The proposed use for non-residential purposes will not generate any students.

## **VIII. COMMUNITY OUTREACH**

The Applicant held a virtual community meeting on November 19, 2020, pursuant to proper notice provided, prior to filing the Applications. Information and minutes from that meeting are submitted with the Applications, but as a separate item.

## **IX. PLANNING BOARD REQUIRED FINDINGS FOR SKETCH PLAN**

The Sketch Plan must satisfy all requirements for approval of a Sketch Plan under the optional method of development procedures of the Zoning Ordinance for the EOF Zone. Section 59.7.3.3.E of the Zoning Ordinance provides that to approve a Sketch Plan, the Planning Board must find that the following elements are appropriate in concept and appropriate for further details at site plan:

### **A. The Sketch Plan must meet the objectives, general requirements, and standards of this Chapter 59.**

1. The Sketch Plan meets the general requirements for optional method of development in the EOF Zone under Section 59.4.6.4.A as follows:

- a. Procedure for approval

The submittal of the Sketch Plan Application and accompanying materials satisfies this requirement. Concurrently with the Sketch Plan Application, the Applicant has submitted the Site Plan Application.

- b. Public benefit points and categories

The Applications contain a Public Benefits Calculation Chart below outlining how the Sketch Plan and Site Plan Applications will provide public benefits to support increased density on the Property (See page 7 below).

- c. Building Type

All building types are allowed in the EOF Zone under the optional method of development.

- d. Compatibility Standards

The compatibility standards in Section 59.4.1.8 of the Zoning Ordinance apply in a very limited way to the Property, because although the Property abuts or confronts a property in an Agricultural, Rural Residential, or Residential Zone, that property is neither vacant nor used for an agricultural or residential purpose. The adjoining Parcel A, though zoned residential, is developed with a use that is not residential or agricultural in nature -- specifically, a surface parking lot, with its related improvements (paving, striping, curbs, etc.). As such, the property is not considered as "vacant" and, therefore, Section 59.4.1.8.A.2 and Section 59.4.1.8.B do not apply

for purposes of either setbacks or height measurement. Therefore, only Section 59.4.1.8.A.1.b applies as to setback measurement. That measurement is made using the “Side setback, abutting all other zones” and the “Rear setback, abutting all other zones” in the applicable standard method development standard tables. Similarly, for height, since 59.4.1.8.B does not apply, there are no height limitations beyond that of the EOF Zone.

2. The Sketch Plan meets the Development Standards for Optional Method Development in the EOF Zone under Section 59.4.6.4.B of the Zoning Ordinance as follows:

- a. The plan meets the development standards of Section 59.4.6.4 of the Zoning Ordinance as shown in the Data Table.

A copy of the Data Table is included in the Appendix to this Statement.

1. Open space

Pursuant to Section 59.4.6.4.B.1 of the Zoning Ordinance, the Applicant is not required to provide open space because the lot area is less than one acre and has only one existing right-of-way frontage.

2. Lot, density, and height

As shown on the Sketch Plan, the development will be fully consistent with the applicable zoning for the Property.

3. Placement

Setbacks for principal buildings and parking are established at site plan.

4. Form

Form standards are established at site plan.

3. The Sketch Plan must propose an outline of public benefits that supports the requested incentive density and that is appropriate for the community.

The Application contains an Incentive Density Calculations and Summary Benefit Table that details how this optional method development project will provide the following significant public benefits in order to realize the maximum permitted density on the Property. For this Project, the Zoning Ordinance requires 60 points in three categories. The Project proposes in excess of the minimum of 60 incentive benefit points required. All public benefits will comply with the Guidelines and are further detailed in the site plan section of this Statement.

The Incentive Density Calculations and Summary Benefit Table is included below. A detailed discussion of the individual incentive benefits is set forth after the Table.

United Therapeutics Project 242T - Incentive Points			
		Maximum Allowed for Section	Project 242T Request
<b>4.7.3.A - Major Public Facilities</b>			
4.7.3.A	Major Public Facilities	40	40
<b>4.7.3.B - Transit Proximity</b>			
4.7.3.B	Transit Proximity	25	15
<b>4.7.3.C - Connectivity &amp; Mobility</b>			
4.7.3.C.2	Minimum Parking	10	10
<b>4.7.3.E - Quality Building &amp; Site Design</b>			
4.7.3.E.2	Exceptional Design	10	10
<b>4.7.3.F - Natural Environmental Protection &amp; Enhancement</b>			
4.7.3.F.2	Cool Roof	10	5
4.7.3.F.9	Vegetated Roof	15	7.5
<b>Total Public Benefit Points</b>			<b>87.5</b>

a. Major Public Facilities (Section 59.4.7.3 A)

The Applicant requests points under this category for the donation of solar panels to the Parks Department in order to assist the Parks Department in meeting its goals to increase the use of solar energy to satisfy its facility needs. The Applicant has been in touch with Mr. James Poore and Facility Management and they have preliminarily identified three potential sites for the use of panels.

The solar panel donation has an estimated value of \$315,000.00: comprised of (a) estimated material value of \$235,000.00; and (b) projected annual cost savings of \$6,000 - \$10,000 in energy generation over the next 10 years.

The net lot area within the EOF portion of the site is 26,150 square feet; the area of the solar panel array is 3,778 square feet.

Calculation of points:  $\frac{((L+F)/N)*2 + ((C/N)*4)}{((0+0)/26150)*2 + ((3778/26150)*4)} * 100 = 57.79$  points

The Applicant requests the maximum allowable 40 points under this category.

b. Transit Proximity (Section 59.4.7.3.B)

The Applicant requests points under this category for the physical location of the Property relative to transit facilities in Silver Spring. As discussed above, the Project is located within ½-mile of major transportation venues, including the multi-modal Paul S. Sarbanes Transit Center and the Silver Spring Metro Station. Accordingly, the Application meets the locational standards to support transit service proximity level points under this category.

Calculation of points: None.

The Applicant requests 15 points under this category.

c. Connectivity and Mobility (Section 59.4.7.3.C)

The Applicant will provide 47 parking spaces. This amount is fewer than 195 parking spaces, the maximum required number of parking spaces (under Section 59.4.7.3.C.2) under this category.

Calculation of points:  $((A-P)/(A-R))*10; ((195-47)/(195-65))*10 = 11.38$  points

The Applicant requests the maximum allowable 10 points under this category.

d. Quality Building and Site Design (Section 59.4.7.3.E.2)

The Applicant intends to design and construct a building that exemplifies exceptional design, one with visual and functional elements that enhance the character of the north side of Spring Street and, at the same time, relate to and complement the architecture in the balance of the United Therapeutics Campus. The design of the building coordinates with the existing campus, utilizing similar materials, colors and forms to continue the aesthetic of the campus.

The design of the building and site are discussed in more detail in the site plan section of this Statement.

Calculation of points: None

The Applicant requests 10 points under this category.

e. Protection and Enhancement of the Natural Environment (Section 59.4.7.3.F)

Cool Roof. The Applicant intends to provide a cool roof for the area of roof that is not covered by green roof, net of the area dedicated to mechanical and solar.

Calculation of points: None

The Applicant requests 5 points under this category.



Vegetated Roof. A vegetated roof will be installed on the roof of the mechanical penthouse, providing a minimum soil depth of at least 4 inches covering at least 33% of a building's roof area excluding area for mechanical and solar.

Calculation of points: Area of Green Roof / Net Roof Area;  $3400/10120 = 0.335$

The Applicant requests 7.5 points under this category.

**B. The Sketch Plan substantially conforms with the recommendations of the applicable master plan;**

A general overview of the Master Plan identifies Silver Spring as well-positioned, as it is close to the District of Columbia and near public transportation. The Project will be within a 1/2-mile radius, within a walking distance of approximately 2,660 feet, from the Silver Spring Metro Station and from the multi-modal Paul S. Sarbanes Transit Center that includes the MARC commuter rail station, WMATA Metrobus, Montgomery County Ride-On Bus service, the University of Maryland bus, and the Bus Rapid Transit ("BRT"). The future Purple Line stop will be located near the Metro Station. The Project is also within walking distance to the proposed Purple Line Station that will be located adjacent to the new Silver Spring Library.

The Property is within the area encompassed by the Master Plan. The intent behind the Plan is "to sustain a livable community of neighborhoods in north Silver Spring by preserving their positive attributes and guiding change so that it strengthens the function, character, and appearance of the area" (Plan, p.21).

In 2000, the Plan confirmed the then-existing zoning on the north side of Spring Street, between Spring Street and Noyes Drive (with few exceptions that do not include the Property). In keeping with the Plan's overall intent, the Plan recommended that the C-O Zone (Commercial-Office) be retained on the Property and on the properties on the north side of Spring Street to the west and northwest of the Property (See Map 10, Plan p. 22, and Map 15, Plan p. 36). The Plan further recommended that the R-60 Zone (Single-family Residential) be retained for both the portion of the Property used as a surface parking lot and for the lots adjacent to Noyes Drive (See Map 10, Plan p. 22 and Map 15, Plan p. 36).

Pursuant to District Map Amendment G-956 (adopted July 15, 2014) that implemented the new zoning categories from the comprehensive rewriting of the Zoning Ordinance in 2014, the Property was rezoned. The portion of the Property previously zoned C-O was rezoned EOF-3.0, H-100 (Employment-Office); the portion of the Property previously zoned R-60 was confirmed as R-60 (Single-family Residential).

The Project conforms to the recommendations of the Plan because it will be a medical/scientific production facility, an employment/office use, and the surface parking lot used in connection with the commercial use will remain a surface parking lot. Further, the Project will strengthen the function, character, and appearance of the area. The Project will: (1) revitalize the area along Spring Street and Cameron Street with an attractive, modern building and improved landscaping; (2) bring new employees into downtown Silver Spring; and (3) provide the facility for high-level scientists to engage in life-saving, cutting-edge science, as previously described.

**C. Satisfy under Section 7.7.1.B.5 the binding elements of any development plan or schematic development plan in effect on October 29, 2014;**

The Sketch Plan is not subject to a development plan or a schematic development plan. Therefore, this standard does not apply.

**D. Under Section 7.7.1.B.5, for a property where the zoning classification on October 29, 2014 was the result of a Local Map Amendment, satisfy any green area requirement in effect on October 29, 2014; any green area under this provision includes and is not in addition to any open space requirement of the property's zoning on October 30, 2014;**

The zoning classification of the Property on October 29, 2014 was not the result of a local map amendment. Therefore, this standard does not apply.

**E. Achieve compatible internal and external relationships between existing and pending nearby development;**

The building is designed with special consideration of adjacent properties and public rights-of-way. It has been sited so that it does not encroach beyond the setbacks springing from the adjacent properties. The façade has been designed to blend into the adjacent campus in material quality, texture, and color, while also reducing the visual scale of the building. Full-story banding of materials that spring from the gently curved curtainwall façade wrap the building and create a unifying and unique character for the site and its surroundings. Adjacent to Fairview Court, the west facade has been located below the angular plane projections from the nearest existing townhouse and from the nearest townhouse lot line. The western projection of the main structure provides relief for the west façade and creates a narrower façade for views from the northwest. Again, the visual scale of this façade is reduced through multistory banding and geometric relief. The mechanical penthouse has been strategically placed to the east and purposefully away from the western residential properties, such that it is not visible from these viewing corridors. New landscaping has been designed along the building and up to the edge of the existing residential parking to the west. This integrates with the new retaining wall, thereby providing enhanced visual and physical transition of the properties from what exists today to a landscape comprised of low level shrubs with trees above them. Adjacent to the 1105 Spring Street commercial condominiums, a 10-foot offset to maintain sufficient fire separation distance has been provided.

**F. Provide satisfactory general vehicular, pedestrian, and bicyclist access, circulation, parking, and loading;**

The site provides for safe circulation to the building's users, visitors, and service vehicles. Vehicular and pedestrian access is provided within the Cameron Street public right-of-way, which is of variable width, ranging from approximately 50 to 65 feet up to 100 feet at the cul-de-sac terminus. The right-of-way provides for a two lane roadway with pedestrian sidewalks on both sides of the street. The proposed main site vehicular driveway access to the building's parking lot is located at the terminus of the Cameron Street cul-de-sac. This proposed driveway is to be private, secured with an automatic proxy

arm gate, and is to be bi-directional and 16 feet wide. The proposed loading service driveway is accessed from Cameron Street and is an enclosed single loading service bay sized for SU-30 delivery vehicles. A second single loading service bay is proposed adjacent to the loading driveway along the south side of the building. The Applicant is requesting a permit for removal of a minimum of ten (10) existing on-street parking meters. The meters to be removed are meters numbers xxxx, xxxx, 1804, 1806, 1808, 1810, 1811, 1812, 1813, and 1814. The site's proximity to the County's recently constructed Spring Street bicycle lanes provides for a low stress bicycle access route to the Property up Cameron Street.

**G. Propose an outline of public benefits that supports the requested incentive density and is appropriate for the specific community;**

See discussion in Section IX.A.3.

**H. Establish a feasible and appropriate phasing plan for all structures, uses, rights-of-way, sidewalks, dedications, public benefits, and future preliminary and site plan applications.**

The Project will be built in one phase.

**X. PLANNING BOARD FINDINGS REQUIRED FOR SITE PLAN**

Section 59.7.3.4.E of the Zoning Ordinance provides that in order to approve a Site Plan, the Planning Board must find that the proposed development:

**A. Satisfies any previous approval that applies to the site;**

The only previous approval applicable to the site is the special exception for off street parking in connection with a commercial use that will continue to apply to the Property. Any changes to that approval would need to be approved by the Board of Appeals or the Planning Board as a site plan amendment, under the provisions of Zoning Text Amendment No. 20-06, once adopted.

**B. Satisfies under Section 7.7.1.B.5 the binding elements of any development plan or schematic development plan in effect on October 29, 2014;**

This finding does not apply to the Property because the Property is not subject to a development plan or a schematic development plan.

**C. Satisfies under Section 7.7.1.B.5 any green area requirement in effect on October 29, 2014 for a property where the zoning classification on October 29, 2014 was the result of a Local Map Amendment;**

This finding does not apply to the Property because the zoning of the Property was not the result of a Local Map Amendment.

**D. Satisfies applicable use standards, development standards, and general requirements under this Chapter;**

1. Development Standards

The Property is split-zoned and includes a gross tract area of approximately 35,542 square feet of property zoned EOF-3.0, H-100 and 34,245 square feet of property zoned R-60. The Applications satisfy the applicable development standards as shown in the Data Table in the Appendix to this Statement.

2. Goals and Intent of the EOF Zone

The EOF Zone permits non-residential uses, including office, technology, and general commercial uses. The EOF Zone is appropriate for targeting jobs and services co-located near diverse housing options. The EOF Zone allows flexibility in building, circulation, and parking lot layout.

The proposed Project will bring approximately 155 new employees to the United Therapeutics campus. Many these employees will be high level scientists and other experts in related technical professions, in addition to other engineering and entry level technician positions.

The Project is located nearby several diverse housing opportunities within a ½ block walk. These housing choices include: townhomes, single-family homes, and apartment buildings, such as Cole Spring Plaza apartments at the northwest corner of the intersection of Colesville Road and Spring Street, Cameron House, immediately behind the United Therapeutics building at the southwest corner of Cameron Street and Spring Street, and the future mixed-use development to be constructed at the southeast corner of the intersection of Georgia Avenue and Spring Street (on the former site of the Montgomery County Planning Board of the M-NCPPC). Such opportunities are just a short, limited list of the wide range of nearby housing choices for new employees.

3. To Satisfy Requirements Of Section 59.4.7.1 Of The Zoning Ordinance

The Application contains an Incentive Density Calculations and Summary Benefit Table that details how this optional method development project will provide the following significant public benefits in order to realize the maximum permitted density on the Property. For this Project, the Zoning Ordinance requires 60 points in three categories. The Project proposes in excess of the minimum of 60 incentive benefit points required. All public benefits will comply with the Guidelines as further detailed herein.

The Incentive Density Calculations and Summary Benefit Table is included below. A detailed discussion of the individual incentive benefits is provided after the Table.

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4.7.3.C.2	Minimum Parking	10	10
<b>4.7.3.E - Quality Building &amp; Site Design</b>			
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<b>4.7.3.F - Natural Environmental Protection &amp; Enhancement</b>			
4.7.3.F.2	Cool Roof	10	5
4.7.3.F.9	Vegetated Roof	15	7.5
<b>Total Public Benefit Points:</b>			<b>87.5</b>

a. Major Public Facilities (Section 59.4.7.3 A.)

The Applicant requests points under this category for the donation of solar panels to the Parks Department in order to assist the Parks Department in meeting its goals to increase the use of solar energy to satisfy its facility needs. The Applicant has been in touch with Mr. James Poore and Facility Management and they have preliminarily identified three potential sites for the use of panels.

The solar panel donation has an estimated value of \$315,000.00: comprised of (a) estimated material value of \$235,000.00; and (b) projected annual cost savings of \$6,000 - \$10,000 in energy generation over the next 10-years.

The net lot area within the EOF portion of the site is 26,150 square feet; the area of the solar panel array is 3,778 square feet.

Calculation of points: 
$$(((L+F)/N)*2)+((C/N)*4))*100;$$

$$(((0+0)/26150)*2)+((3778/26150)*4))*100 = 57.79 \text{ points}$$

The Applicant requests the maximum allowable 40 points under this category.

b. Transit Proximity (Section 59.4.7.3.B)

The Applicant requests points under this category for the physical location of the Property relative to transit facilities in Silver Spring. As discussed above, the Project is located within ½-mile of major transportation venues, including the multi-modal Paul S. Sarbanes Transit Center and the Silver Spring Metro Station. Accordingly, the Application meets the locational standards to support transit service proximity level points under this category.

Calculation of points: None.

The Applicant requests 15 points under this category.

c. Connectivity and Mobility (Section 59.4.7.3.C)

The Applicant will provide 47 parking spaces. This amount is fewer than 195 parking spaces, the maximum required number of parking spaces (under Section 59.4.7.3.C.2) under this category.

Calculation of points:  $((A-P)/(A-R))*10; ((195-47)/(195-65))*10 = 11.38$  points

The Applicant requests the maximum allowable 10 points under this category.

d. Quality Building and Site Design (Section 59.4.7.3.E.2)

The Applicant intends to design and construct a building that exemplifies exceptional design, one with visual and functional elements that enhance the character of the north side of Spring Street and, at the same time, relate to and complement the architecture in the balance of the United Therapeutics Campus. The proposed facility not only embraces the spirit and intent of the Exceptional Design provisions, but also embodies them. The pro-urbanist intent of the criteria is in complete alignment with United Therapeutics's philosophy and as it is exemplified in the details of its Silver Spring Campus.

This new facility is not a standalone element, but rather an extension of this thriving urban campus. The Campus as a whole serves as a landmark and a gateway to Silver Spring. This infill development utilizes consistent materials and compatible forms to complement the existing structures. The new building adapts elements from the existing Campus to create a building composition that expresses its unity with the Campus, while also distinguishing its unique internal activities manifested through its exterior expression. As an individual structure, it provides a visual extension and anchor for the viewing corridor down Cameron Street, thereby enhancing both the pedestrian experience through Cameron Court and the pedestrian path to S Noyes Drive.

United Therapeutics's new production facility has been designed to maximize the capacity of the site and the building footprint to achieve production capacity for optimal throughputs of organ manufacturing. The materials utilized on the facade have been selected to respond to the spaces they enclose, such as louvers at mechanical floors, glazing at circulation corridors, and metal panel rainscreen where durability and privacy are priorities. The cleanrooms pose a particular challenge for glazing conditions, where daylighting and views are desirable but indoor

environmental conditions are paramount, as they drive the form and design features that can be employed for this specialized building and, therefore, must take precedence for functionality.

Each facade was individually designed to break down the building's scale into reasonable proportions that vary in material and color around the perimeter, drawing from the existing Campus palette. Glazing has been provided wherever possible and is the primary material on the main elevation that fronts Cameron Court. Undulating ribbons of curtainwall span across every occupied floor, and project into the mechanical levels to minimize the height of louvers in between. The percent of transparent glazing at the ground level is approximately 24%, spanning the width of the entrance lobby from floor to ceiling and extending the full height of the stair tower, a distinctive visual element, which is located to the north of the entrance.

At upper occupied floors, transparent glazing is provided at approximately 15% of the main facade. The entire curtainwall system, including spandrel glazing, makes up 88% of the main elevation of each occupied floor and extends into the normally unoccupied mechanical levels.

Side and rear elevations are broken up with multiple colors, textures and planes. As an example, the north facade includes louvered screen walls, metal panels in terra cotta color, corrugated gray metal panels, and spandrel glazing. None of these materials accounts for more than 37% of this facade.

In addition to roof mounted solar panels and green roof, the facility will utilize geo-exchange wells, storm water reclamation, and next generation battery storage to reduce emergency generator needs, thus reducing emissions and noise. The final result is a unique, creative, and appropriate design solution to integrating a production facility into an urban campus to the ultimate benefit of the operations staff who will utilize the building, as well as to the surrounding communities.

Calculation of points: None

The Applicant requests 10 points under this category.

e. Protection and Enhancement of the Natural Environment (Section 59.4.7.3.F)

Cool Roof. The Applicant intends to provide a cool roof for the area of roof that is not covered by green roof, net of the area dedicated to mechanical and solar.

Calculation of points: None

The Applicant requests 5 points under this category.

Vegetated Roof. A vegetated roof will be installed on the roof of the mechanical penthouse, providing a minimum soil depth of at least 4 inches covering at least 33% of a building's roof area excluding area for mechanical and solar.

Calculation of points: Area of Green Roof / Net Roof Area;  $3400/10120 = 0.335$

The Applicant requests 7.5 points under this category.

**E. Satisfies the applicable requirements of:**

**1. Chapter 19, Erosion, Sediment Control, and Stormwater Management**

Environmental Site Design (ESD) will be provided to the Maximum Extent Practicable (MEP) through the use of green roof on one half of the mechanical penthouse area, rainwater harvesting on the remaining roof area to be used for gray water within the building and irrigation for landscaping and gardens, four rain gardens in the parking lot, three micro-bioretenment facilities in the right of way along Cameron Street, and non-rooftop disconnection on sidewalk areas in both the private and public sections of the site.

The green roof will be four inches thick and located on top of the mechanical penthouse area. Overflow from the green roof will be directed via pipe to the proposed rainwater harvesting cistern under the parking lot.

The rainwater harvesting cistern will be located underground beneath the parking lot, and water will be pumped back into the building for gray water use, as well as pumped to the rain gardens and proposed landscaped areas for irrigation.

Landscaped areas for dewatering include the northern edge of the proposed parking lot, the eastern edge of the proposed parking lot above the existing sidewalk, trees in the parking island, and all four rain gardens. The three rain gardens on the west side of the proposed parking lot may also be used for dewatering. These three rain gardens will be located at the west end of the parking lot where the existing concrete channels currently flow offsite.

Three rain gardens will be located in a line along the west edge of the parking lot, and will be separated by six inch concrete walls, which will extend around the north, south, and west facing sides of the gardens. The outer gardens will overflow via weir walls into the center garden, which then overflows into a drain basin and goes to a pipe that outfalls into the existing channel offsite. Flow into the gardens will be provided by curb cuts.

**2. Chapter 22A, Forest Conservation**

The site's forest conservation plan meets all applicable requirements of Chapter 22A, regarding forest conservation. The existing site contains no forest, wetlands, 100 year floodplain, or stream valley buffers, based on the NRI/FSD approved on December 16, 2020. The proposed forest conservation, based on the Commercial and Industrial Use Areas (CIA) use category is to provide a 15% afforestation threshold, having a requirement of approximately +/- 0.25 acres of afforestation mitigation. The requirement to be satisfied by purchasing forest banking credits, or payment of fee-in-lieu.

There is an existing specimen tree (No.1-30 inch dbh White Pine) located on-site near the north property line (situated between the existing wood fence and paved parking lot) that will be removed with the final site construction activities. A Tree Variance Request and Justification for the removal of the 30" dbh tree has been submitted to the Montgomery County Planning Department Staff for review and approval of the removal of the 30" tree (see letter dated February 16, 2021 (date of revision) from Rodgers Consulting, Inc, to the Montgomery County Planning Department). There is also an existing significant tree (No.2-25 inch dbh Willow Oak) located



off-site in the public right-of-way's cul-de-sac island, which is also to be removed as part of this plan, per the request from Montgomery County Fire & Rescue Services.

**F. Provides safe, well-integrated parking, circulation patterns, building massing and, where required, open spaces and site amenities;**

The Site Plan provides adequate, safe and efficient parking and circulation patterns, building massing, open spaces, and site amenities. The proposed development will improve pedestrian circulation and the pedestrian experience along the Cameron Street cul-de-sac on the north side of Spring Street.

The existing parking lot will be re-built as part of this site plan, with new curb and gutters to provide for the requirement of a minimum of 5% parking lot internal green islands. Newly proposed native tree plantings provide for the shaded pavement tree canopy coverage requirement of minimum 25%. The parking lot will also provide for the site's ADA, electric vehicle, and motorcycle parking spaces. In addition, the parking lot will implement stormwater management quality treatment and rain garden facilities, with additional site vegetation. The parking lot will be secured with automatic gate access providing a bi-directional paved 16-foot driveway from the Cameron Street cul-de-sac. The main pedestrian connectivity is at the building's main lobby, situated along the public right-of-way of the Cameron Street cul-de-sac. Providing an on-site thru-block pedestrian connection is an existing sidewalk from the terminus of the Cameron Street cul-de-sac through the site along the eastern property to Noyes Drive's public right-of-way. This pathway is to be enhanced with proposed pedestrian lighting and added landscaping. There is a proposed outdoor amenity area for employees between the building's east façade and driveway, to provide an outdoor space with seating elements, green screen wall, pavers, and landscaping. The Project also provides for parking lot landscaping and fencing around the site's western and northern edges.

**G. Substantially conforms with the recommendations of the applicable master plan and any guidelines approved by the Planning Board that implement the applicable plan;**

A general overview of the Master Plan identifies Silver Spring as well-positioned, as it is close to the District of Columbia and near public transportation. The Project will be within a 1/2-mile radius, within a walking distance of approximately 2,660 feet, from the Silver Spring Metro Station, from the multi-modal Paul S. Sarbanes Transit Center that includes the MARC commuter rail station, WMATA Metrobus, Montgomery County Ride-On Bus service, and the University of Maryland bus, and from the BRT stop at Fenton Street and Colesville Road. The future Purple Line stop will be located near the Metro Station. The Project is also within walking distance to the proposed Purple Line Station that will be located adjacent to the new Silver Spring Library.

The Property is within the area encompassed by the Master Plan. The intent behind the Plan is "to sustain a livable community of neighborhoods in north Silver Spring by preserving their positive attributes and guiding change so that it strengthens the function, character, and appearance of the area" (Plan, p.21).

In 2000, the Plan confirmed the then-existing zoning on the north side of Spring Street,

between Spring Street and Noyes Drive (with few exceptions that do not include the Property). In keeping with the Plan's overall intent, the Plan recommended that the C-O Zone (Commercial-Office) be retained on the Property and on the properties on the north side of Spring Street to the west and northwest of the Property (See Map 10, Plan p. 22, and Map 15, Plan p. 36). The Plan further recommended that the R-60 Zone (Single-family Residential) be retained for both the portion of the Property used as a surface parking lot and for the lots adjacent to Noyes Drive (See Map 10, Plan p. 22 and Map 15, Plan p. 36).

Pursuant to District Map Amendment G-956 (adopted July 15, 2014) that implemented the new zoning categories from the comprehensive rewriting of the Zoning Ordinance in 2014, the Property was rezoned. The portion of the Property previously zoned C-O was rezoned EOF-3.0, H-100 (Employment-Office); the portion of the Property previously zoned R-60 was confirmed as R-60 (Single-family Residential).

The Project conforms to the recommendations of the Plan because it will be a medical/scientific production facility, an employment/office use, and the surface parking lot used in connection with the use will remain a surface parking lot. Further, the Project will strengthen the function, character, and appearance of the area. The Project will: (1) revitalize the area along Spring Street and Cameron Street with an attractive, modern building and improved landscaping; (2) bring new employees into downtown Silver Spring; and (3) provide the facility for high-level scientists to engage in life-saving, cutting-edge science, as previously described.

There are no guidelines approved by the Planning Board for the applicable Master Plan.

**H. Will be served by adequate public services and facilities including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage, and other public facilities. If an approved adequate public facilities test is currently valid and the impact of the development is equal to or less than what was approved, a new adequate public facilities test is not required. If an adequate public facilities test is required the Planning Board must find that the proposed development will be served by adequate public services and facilities, including schools, police and fire protection, water, sanitary sewer, public roads, and storm drainage;**

The Property will be served by adequate public services and facilities as set forth in Section VII. of this Statement. The development will not generate any students and, therefore, no school test will apply. The County Council has adopted the new 2020-2024 revision to the Subdivision Staging Policy (now "Growth and Infrastructure Policy") that will temporarily exempt bioscience from Local Area Transportation Review ("LATR") under certain circumstances. See Section TL 2.6 "temporary suspension for bioscience facilities" in Resolution No. 19-655. Project 242T qualifies for the exemption.

The Property will be served by public water and sewer systems. The applicant will submit to WSSC a site Hydraulic Planning Analysis for review and approval of adequate water and sewer service. The applicant will subsequently submit permit plans for site water and sewer connections to the WSSC DSD review staff for permitting of construction.

Montgomery Fire Station No. 1 is located approximately 0.8 mile from the Property at

8110 Georgia Avenue. The Police Stations serving the Property are located at 7506 Maple Avenue in Takoma Park, Maryland, approximately 2.5 miles away, and at 605 Stephen Sitter Avenue in Silver Spring, Maryland, approximately 2.0 miles away.

**I. On a property in a Rural Residential or Residential zone, is compatible with the character of the residential neighborhood;**

Building supporting equipment such as dumpsters, emergency generator and process utility microbulk tanks that are located above grade in the residentially-zoned portion of the lot have been screened with visual and acoustical barriers to remove potential negative impacts on the adjacent neighborhood.

**J. On a property in all other zones, is compatible with existing and approved or pending adjacent development.**

The building has been sited so that it sits within all permissible boundaries, including setbacks from adjacent residential properties and public rights of way. The floor plates have been maximized on the site to allow optimal production capacity, while respecting the presence of the townhouses to the west. The portion of building extending westward toward these townhouses is a narrow projection. This narrow building face is clad in a manner that breaks up the facade with a composition of varying textures and colors. Landscaping has been added along the western facade immediately adjacent to the building to form a screen of trees and shrubs in the area facing the neighboring parking lot. Farther into the site, a new screen wall with multiple species of trees will add an improved, natural buffer.

The mechanical penthouse has been anchored to the northeast corner of the roof, setting it back from adjacent residential properties. All building supporting equipment such as dumpsters, recycling containers, emergency generators and process utility microbulk tanks, that are located above grade in a portion of the residentially-zoned portion of the lot, have been screened with visual and acoustical barriers to prevent potential impacts on the adjacent neighborhood. These screening elements have also been designed with the same quality and character of the main building façade. In addition, these elements have been placed as far east as possible in order to maximize the distance away from the properties to the west. The surface parking area will be upgraded with additional landscaping and planting as well, and the majority of the western property boundary will remain parking against the existing residential parking to maximize and enhance the compatibility that exists today.

**XI. SECTOR PLAN CONFORMANCE**

The Project's conformance with the Master Plan is presented in Section IX.B above.

**XII. STAGING – RELATION TO CAPITAL IMPROVEMENT PROGRAM**

The Project will be developed in one phase. The Project is not dependent on any elements of the Capital Improvement Program.

### **XIII. CONCLUSION**

As demonstrated by the contents of this Combined Justification Statement in support of the Applications for a Sketch Plan and Site Plan, including APF, the proposed medical/scientific building complies with all the Zoning Ordinance requirements and Montgomery County Code requirements governing Sketch and Site Plans under the Optional Method Development provisions of the EOF Zone and the requirements for APF review under the subdivision regulations. The existing parking lot on the R-60 zoned portion of the Property will continue to be used as a parking lot.

This new Project will make a significant contribution to the economic development of Silver Spring and to Montgomery County as a whole, by improving the appearance and success of Silver Spring north of the Spring Street Area. The Project will also make a significant contribution to scientific and medical innovation by providing a modern production facility that will enable scientists to produce personalized lungs from the cells of patients who desperately need lung transplants.

## **APPENDIX**

## Gross Tract Area

### Gross Tract Area

	EOF-3.00		R-60	
Existing Lots	26,150 sf	0.60 ac.	33,976 sf	0.78 ac.
Prior Dedications	9,392 sf	0.22 ac.	269 sf	0.01 ac.
<b>Gross Tract Area</b>	<b>35,542 sf</b>	<b>0.82 ac.</b>	<b>34,245 sf</b>	<b>0.79 ac.</b>

### Area by Property

Zone 1 - EOF 3.0, H-100		Site Area	
8830 Cameron Street	Existing Lot	18,897 sf	0.43 ac.
	8830 Cameron ( Prior Dedication A-1 )	2,555 sf	0.06 ac.
	8830 Cameron ( Prior Dedication A-2 )	4,240 sf	0.10 ac.
		<b>25,692 sf</b>	<b>0.59 ac.</b>
8808 Cameron Street	Existing Lot	7,253 sf	0.17 ac.
	8808 Cameron ( Prior Dedication B-1 )	1,609 sf	0.04 ac.
	8808 Cameron ( Prior Dedication B-2 )	988 sf	0.02 ac.
		<b>9,850 sf</b>	<b>0.23 ac.</b>

Zone 2 - R-60		Site Area	
8830 Cameron Street	Existing Lot	33,976 sf	0.00 ac.
	8830 Cameron ( Prior Dedication A-3 )	269 sf	0.00 ac.
		<b>34,245 sf</b>	<b>0.00 ac.</b>

### Allowable Density

Zone 1 - EOF 3.0, H-100		
EOF 3.0, H-100	Gross Tract Area	35,542 sf
<b>Maximum Allowable Density</b>		<b>106,626 sf      3.00</b>

## Sketch Plan - Application Area

<b>Existing Tract Area ( EOF 3.0 Portion Only )</b>				
<b>8830 Cameron Street</b>				
			Square Footage	Acreage
		8830 Cameron Street	18,897 sf	0.43 ac.
		Prior Dedications	6,795 sf	0.16 ac.
			25,692 sf	0.59 ac.
<b>8808 Cameron Street</b>				
		8808 Cameron Street	7,253 sf	0.17 ac.
		Prior Dedications	2,597 sf	0.06 ac.
			9,850 sf	0.23 ac.
<b>Proposed Lot Area ( EOF 3.0 Portion Only )</b>				
		Gross Tract	35,542 sf	0.82 ac.
		Prior Dedications	9,392 sf	0.22 ac.
		Proposed Dedication	0 sf	0.00 ac.
		Net Lot Area	26,150 sf	0.60 ac.

Sketch Plan Data Table ( Section 59.4 .6.4 )				
Development Standard		Permitted / Required		Proposed
Gross Tract Area ( EOF Area Only ) [1]				
EOF 3.0 H-100'				
8830 Cameron Street		n / a	25,692 sf	0.59 ac.
8808 Cameron Street		n / a	9,850 sf	0.23 ac.
Total Gross Tract Area			35,542 sf	0.82 ac.
Net Lot Area ( EOF Area Only ) [1]				
Gross Tract		n / a	35,542 sf	0.82 ac.
Prior Dedications		n / a	9,392 sf	0.22 ac.
Proposed Dedication		n / a	0 sf	0.00 ac.
Net Lot Area ( EOF Area Only ) [1]			26,150 sf	0.60 ac.
EOF Density (GFA / FAR ) [1]				
EOF 3.0 H-100'		106,626 sf	3.00	65,000 sf
Building Height		100'	Up to 100'	
Public Open Space ( min. ) [2]		0%	0%	
Minimum Setbacks		n / a	0'	
[1]	Based on application area of EOF Zoned property.			
[2]	Net Lot Area 0.51 to 1.00 acres; and 1 Frontage			



## Site Plan - Application Area

Existing Tract Area				
8830 Cameron Street ( EOF 3.0 H-100' )				
			Square Footage	Acreage
		8830 Cameron Street	18,897 sf	0.43 ac.
		Prior Dedications	6,795 sf	0.16 ac.
			25,692 sf	0.59 ac.
8830 Cameron Street ( R-60 )				
		8830 Cameron Street	33,976 sf	0.78 ac.
		Prior Dedications	269 sf	0.01 ac.
			34,245 sf	0.79 ac.
8808 Cameron Street ( EOF 3.0 H100' )				
		8808 Cameron Street	7,253 sf	0.17 ac.
		Prior Dedications	2,597 sf	0.06 ac.
			9,850 sf	0.23 ac.
Proposed Lot Area				
		Gross Tract	69,787 sf	1.60 ac.
		Prior Dedications	9,661 sf	0.22 ac.
		Proposed Dedication	0 sf	0.00 ac.
		Net Lot Area	60,126 sf	1.38 ac.

### Site Plan Data Table ( Section 59.4 .6.4 )

Development Standard		Permitted / Required		Proposed	
Gross Tract Area					
EOF 3.0 H-100'					
8830 Cameron Street		n / a		25,692 sf	0.59 ac.
8808 Cameron Street		n / a		9,850 sf	0.23 ac.
R-60					
8830 Cameron Street		n / a		34,245 sf	0.79 ac.
Total Gross Tract Area				69,787 sf	1.60 ac.
Net Lot Area					
Gross Tract		n / a		69,787 sf	1.60 ac.
Prior Dedications		n / a		9,661 sf	0.22 ac.
Proposed Dedication		n / a		0 sf	0.00 ac.
Total Net Lot Area				60,126 sf	1.38 ac.
EOF Density ( GFA / FAR ) [1]					
EOF 3.0 H-100'		106,626 sf	3.00	65,000 sf	1.83
Building Height		100'		Up to 100'	
Public Open Space ( min. ) [2]		0%		0%	
Minimum Setbacks ( Principal Structure )					
EOF Zone - Front		n / a		0'	
EOF Zone - Side		n / a		0'	
EOF Zone - Rear		n / a		10'	
[1]	Based on application area of EOF Zoned property.				
[2]	Public Open Space is associated with the EOF Zoned area; Net Lot Area 0.51 to 1.00 acres; and 1 Frontage				

Parking Table ( Section 59-6.2 )						
Development Standard			Permitted / Required		Proposed	
Vehicle Parking ( 59-6.2.4.B )			min.	max.		
Medical / Scientific Manufacturing and Production						
per 1,000 GFA	1.00 min.	3.00 max.	65 sp.	195 sp.	47 sp.	
Calculation of Required Parking ( 59-6.2.3 )						
Sect. 59-6.2.3.C	Motorcycle / Scooter	2%	1 sp.	10 sp.	2 sp	
Sect. 59-6.2.3.D	Car-Share		n / a	n / a	0 sp	
Sect. 59-6.2.3.E	Electric Vehicle		n / a	n / a	2 sp	
ADA Parking						
ADA Van Parking			1 sp.		1 sp.	
ADA Parking			1 sp.		1 sp.	
Bicycle Parking ( 59-6.2.4.C )						
Medical / Scientific Manufacturing and Production						
per 10,000 GFA	1.00 min.		7 sp.		10 sp.	
Long Term	100%		7 sp.		10 sp.	
Oversized	10%		1 sp.		1 sp.	
Standard			6 sp.		9 sp.	
Charging Station	20%		2 sp.		2 sp.	
Short Term	0%		0 sp.		0 sp.	
Loading Design Standard ( 59-6.2.8 )						
Section 59-6.2.8.B.3	between 50,001 sf and 200,000 sf		2 sp.		2 sp.	
[1] Site is located within the Silver Spring parking Lot District, therefore it may provide less then the minimum parking.						