



# LITTLE FALLS WATERSHED ALLIANCE

## EDUCATION - ACTION - STEWARDSHIP

Sarah Morse  
Executive Director

LFWA Comments on Site Plan 820200200  
Kensington of Bethesda at Westwood II

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Thank for you the opportunity to comment on the proposed building for the Westwood II site on Westbard Avenue and Ridgefield Road in Bethesda. Little Falls Watershed Alliance (LFWA) has been involved in reviewing and commenting on Westbard redevelopment since 2015, when the first steps were taken to redo the Westbard Sector Plan. We are strong supporters of the Sector Plan's vision for a new stream valley park along a naturalized Willett Branch stream. We look forward to seeing the vision come to fruition and applaud all the hard work made towards that goal by the Parks and Planning Departments and the tremendous support of the Planning board.

The proposed Kensington of Bethesda residential care facility is especially important to the community, as it is located at the gateway of the new park. The design and construction of the building will set the tone for future buildings and define the entrance to the park. Therefore, environmental and aesthetic considerations are paramount to the success of the park and the new naturalized stream.

It appears that at least half of the proposed building is located within the 50-foot stream buffer. It has long been the position of LFWA that there should be no building allowed in the buffer. However, we understand that given the constraints of the site, the existing building in the buffer, and the realignment of Westbard Avenue at that location that the applicant will be allowed to build inside this important environmental line. Given that the building will be in the buffer, the applicant MUST be required to treat the site as an environmentally sensitive area and take extraordinary measures to do no additional harm to the environment. We believe that the new stream should have every possible advantage so that it can establish itself and thrive for generations to come. Further the design of the park, placement of trails and construction of secure retaining walls will serve generations to come. The whole project is a crown jewel for Montgomery County. Our comments are offered with this in mind.

### **Stormwater Management**

We are very pleased to see that the applicant's stormwater plans are relying almost entirely on micro-bioretenion planters which allow the rain water run-off to soak into the ground. As we presented in our comments on the Preliminary Plan, infiltration is key to the success of the new stream. When the rain water is allowed to soak into the soil, it is cleaned and recharges the ground water. As streams depend on ground water for their flow, a robust infiltration system for stormwater management is paramount for a healthy new Willett Branch.

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At this site, stormwater management techniques that provide infiltration are not only necessary for the health of the new stream, but also for the safety of the building as they help prevent flooding by sending water into the ground, and not into the storm drain system. Not only is the building located in the 50-foot stream valley buffer, but it abuts the 100-year floodplain. As we have seen in recent storms, the 100-year floodplain is only a line and 100 years is only a suggestion of how often flooding might exceed the area. In Maryland, Ellicott City had two major 100-year floods in the last decade, reminding us why we need stormwater management that infiltrates. The applicant is to be commended for their foresight.

- **Bioretention Planters:**

We were happy to see that a 24" underdrain is required for the micro-bioretention planters. These will help increase the infiltration so necessary at this stream-side site. We are not in favor of the applicant adding more green roof so that they can reduce the micro-bioretentions as suggested in the DPS permit. The bioretentions should remain as shown in the current plan.

It is unclear from the drawings if a patio area on an upper floor of the building is located above the bioretention planters. If so, it should be pulled back in line with the facade. Any overhang will block light to the planter and interfere with its use.

- **Green Roof Treatment Train:**

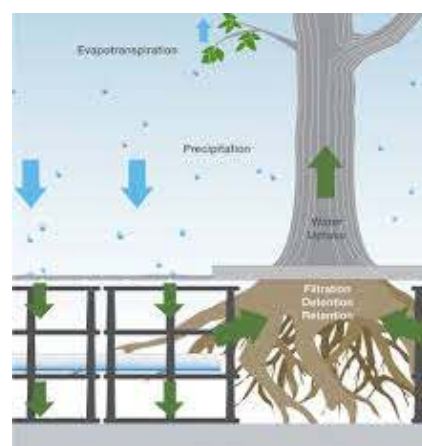
The stormwater management plans calls for 430 square feet of green roof. Although, a green roof is an excellent green technology and good for reducing the heat index and also reducing cooling and heating costs for the building, it does not allow the rain water to infiltrate the ground. However, the run-off from the green roof can be directed to one of the bioretentions. The applicant should be required to incorporate this into the roof drain plans. It doesn't add much to the total volume, but in this site, every little bit is important.

- **Permeable Pavement:**

The plans show a concrete path located within the stream buffer. In keeping with the environmental guidelines for NO impervious surfaces in a buffer, this should be a permeable surface as Parks comments have also stated. All hard surfaces in the stream buffer should be permeable unless county code prohibits it.

- **Open Space with Silva Boxes for Trees:**

There are no trees listed for the site. Yes, the site abuts the Willett Branch, but dedication of that land to Parks does not satisfy the need to provide open space. It is our hope that the developer will be required to provide open space on their property, and that this space will include trees. The preliminary plan requires that if there are tree boxes, they must be Silva cells or similar modular suspended pavement systems. This type of box (shown on the right) will allow the trees to grow bigger and treat more stormwater run-off.



### **Building Use, Design, and Location**

While we applaud the developers for their attention to stormwater management—it is so important to the stream that the stormwater infiltrates—the design of the building is a missed opportunity not only for the community but for the developers. To have a building sited along a park is an attractive amenity that increases the value of a property. To build something that essentially makes the park inaccessible to their residents and so small as to be unappealing to the community is not good either for business or for the environment.

- **Building Design, Size and Proximity to the Trail is Not What was Promised:**

Quite frankly, we are disappointed with the enormous size of the building. From the very start of the Westbard redevelopment process, the community was promised a building at this location that embraced the vision of the new park. The original drawings showed trees between the new trail and the building with storefronts and cafes at ground level. Below are the drawings of the redeveloped Westwood II Center that Equity One (now joined with Regency) provided at the first public meetings to plan the park.



Instead, what we got is a plan that squeezes the area so much that it is not even a park, but a scary canyon-like corridor. Not only are there no trees on the property, there is no room for trees and barely room for the trail.

- **No Eyes on the Park:**

Early planning of the Willett Branch Stream Valley Park emphasized commercial and residential buildings with “eyes on the park”. The vision was for the new park to be a major amenity for the new development as well as the surrounding community. There would be cafes and little shops taking advantage of the stream-side location (much like the Carrol Creek Park Project in Frederick, which spurred a vibrant commercial area with the improvement of the stream). In the applicant’s plan, the residents of their building cannot even access the park except through the fire exit in the parking garage. This could not be further from the original vision, and it’s a significant lost opportunity. The developer is not taking advantage of this amenity in their backyard.

Furthermore, the original plan called for a V-shaped building, with windows along the inside of the V. The new plan has no interior opening and therefore many fewer windows. The first several levels of the building above ground are for parking garages, not residential or commercial space. There are no “eyes on the park.”

- **The Building is too Close to the Trail:**

Parks has commented that the building must be moved back at least one foot so that it is not impacted by the 100-year flood plain. We support this comment, and recommend an even further setback as the current plan provides very little breathing room on the sides of the trail. At some places, the walls of the building either touch the trail or come within a few inches. This is scary for trail users. It is easy to imagine a situation where people will be pushed into the walls by other trail users passing aggressively. We see people pushed to the side all the time on the Capital Crescent Trail by large groups or speeding bikes, but at least the Capital Crescent Trail has shoulders.

Pushing the building back a few feet will also site it further from the stream. While the board permitted some encroachment into the 50-foot buffer, the current design allows for much more of the building in the buffer than we anticipated.

- **Canyon-like Effect is Not Pleasing for New Park:**

The towering 2.5 story parking garage along the park creates a canyon-like effect especially when viewed opposite the Kenwood Building (located across the stream). The walls of the parking garage also contribute to the urban heat index. We recommend that the applicant be required to put in green walls here in addition to moving the building back. The micro-bioretenment planters located along the parking garage can provide the necessary space for green wall plants.

### **Open Space, Land Dedication, and Financial Contribution**

Planner Coordinator Matt Folden’s comment regarding open space suggest that it could be on or off-site.

*Address how public open space requirements are being met through either on-site improvements or off-site (either improvements or financial contribution). This contribution is separate from the \$500k Willett Branch contribution outlined in the Westwood Shopping Center Site Plan, as the site plan associated with that portion of development also had to meet the open space requirements through the provision of the Civic Green and Springfield Neighborhood Park. (comments, August 17)*

It is our feeling that the open space MUST be provided on-site as more open space on this property will compliment the new park and provide space for much needed trees on the property. One of the goals of Montgomery County is to increase our tree canopy. We can’t do it without every developer doing their part.

The developer should also make a substantial financial contribution to the new park. The \$500,000 contribution from Regency was not part of the Preliminary Plan for the Westwood II property, but was a condition in the Site Plan 820180190 (#9) for Westwood I, the Giant site. The developer relies on the park as an amenity for the Kensington building in its Statement of Justification, and should be required to contribute an appropriate share.

Please note that in the Preliminary Plan Resolution, the Westwood II parcel dedication is tied to plat recordings that occur in the Westwood I development. All of the land dedications on the Westwood II property should be made earlier than that if the phasing of construction changes. The dedication of both parcels on the Westwood II site must take place prior to construction of the new Kensington building.

### **The Vision for a Park is for Generations to Come**

The Willett Branch Park may be just a vision today, but it will be an amenity for generations to come. When it is finished, it will provide much needed green space for our community. The Sector Plan describes it as a jewel for Montgomery County. This is our chance to get it right. There is no do-over. With everyone’s commitment to the vision, our grandchildren’s children will be playing in the sparkling water and enjoying the trails.



Thank you for your hard work on this project.

Sarah Morse