



# LITTLE FALLS WATERSHED ALLIANCE

EDUCATION - ACTION - STEWARDSHIP

December 14, 2017

The Little Falls Watershed Alliance (LFWA) is an environmental stewardship group for the Little Falls watershed, located in the Bethesda Chevy Chase area of lower Montgomery County. We have over 2,000 members and since our founding in 2008 have worked with thousands of volunteers addressing environmental issues in the watershed.

One issue that we have been following closely is the plan for a new stream valley park in the Westbard Sector – the Willett Branch Greenway. The 2016 Westbard Sector Plan includes a vision for a revitalized Willett Branch. This stream, a tributary of Little Falls, is now a trapezoidal concrete channel that intersects the Capital Crescent Trail and winds its way through high-rise apartments and a myriad of small-scale industrial and utility buildings. The channel is covered in graffiti and the banks are trash filled. It's an example of the worst thing that could happen to a stream and frankly, an embarrassment to Montgomery County. But this will change. The Willett Branch restoration plan *"envisions a new urban greenway with a program of elements and activities that promotes the ecological and environmental benefits of a naturalized stream."* The new Park will be a crown jewel for the County Park system.

I would like to start by saying we really appreciate the work of the Planning Staff in ensuring that Westbard Self Storage conforms to the vision for the Willett Branch Greenway. And we are grateful for the dedication of Parcel 177 – the first piece of the new park!

We generally support the staff recommendations, but offer these comments:

## 1) Stormwater Management Plan Needs to be More Robust:

The concept plan for the Self Storage relies totally on rooftop treatment. This is great, but it doesn't do two important things:

- I) Treat the surface water run-off. About 1/3 of the square footage of this parcel is parking lots, driveway and pathway. That's a lot of water that isn't being treated. The County's excellent stormwater regulations require that 94% of the water during a rain storm be treated onsite and contained on site to the maximum extent possible. The only reason that the Self Storage Facility is meeting this requirement is because they are overbuilding the green roof. This is allowed, but doesn't conform to the spirit of the regulations. You can never treat 94 percent of the stormwater run-off if all of the management is being done of the roof of the building.
- II) Use any infiltration treatment techniques. This means that the water, while it is being filtered before it enters the stormdrain system, is still going directly to the stream not being put back in the ground. What we would like to see is stormwater management that infiltrates the water – puts it back in the ground.

The hardest thing for people to understand is why does this make a difference? So, I would like to use my time to explain the importance of allowing the water to soak into the ground.

This starts with – where do creeks get their water – when I ask people this question, usually the answer is from rain, but that doesn't tell you address why creeks have water in them during dry periods. Creeks actually get most of their water from ground water. When it rains, the water soaks into the ground, is cleaned by the microbes in the soil and is stored in the cracks and spaces below the land surface. This stored water feeds the stream by percolating up through the stream bed. It is groundwater that provides the baseflow of the stream in periods of no rain. Because so much of the area around the Willett Branch is paved, very little rain water is making its way into the ground. Therefore, recharging the groundwater is paramount for the success of the restored Willett Branch.

This means that the best stormwater management practices for the area are those that allow the rain water to soak into the ground so that there will be plenty of water to feed the new stream. These should be infiltration techniques like rain gardens, swales, pervious pavement and dry wells.

While we understand that the Westbard Self Storage facility has met the requirements for stormwater management with a green roof and other roof top systems, we feel that the storage facility has not met its obligation to contribute to the vision of the new park and naturalized stream. The green roofs are excellent at capturing and filtering the water. They also reduce the building's heating and cooling bills, but they do not put the water back in the ground. In fact, any water that isn't absorbed by the green roof will be discharged into the storm drain system where it will go directly to the creek via a storm drain pipe. The volume and velocity of water from storm drain pipes are known to cause considerable damage to a stream both by flooding the area and by causing erosion at the point of entry. Further, but not treating the surface water, almost 30 percent of the run-off from the property is flowing untreated directly into the creek.

#### **Infiltration Techniques Should be Studied Further for the Site:**

The applicant has argued that given the footprint of their building, there is no room for infiltration techniques. Further, even if there was room, the soil type will not allow the water to soak in. They also ruled out using pervious pavement because of the soil type. LFWA feels that the applicant did not adequately test the soil, and further, that restoring the soil would allow for the use of pervious pavement. We hired Diane Cameron, GreenGrowth, LLC, to review the merits of their arguments. I have gone over them in my written statement, but I want to make sure that you see that it is Ms. Cameron's opinion that

. . . infiltration could be a viable option through one or more techniques, including those that were considered but ruled out by the applicant, and potentially other practices, such as soil restoration, that were not yet considered.

We feel that given that the public interest is served in restoring Willett Branch – a centerpiece of the Westbard Sector Plan – it's in the public interest for Montgomery County agencies and other stakeholders to work with the applicant to a) seriously re-consider, at a greater depth of analysis, the possibility of adding stormwater infiltration practices to this site's treatment train; and b) to evaluate a full range of options for providing incentives and assistance to the applicant to support installation of this fuller treatment train.

We would like a condition of the applicants' approval that the infiltration techniques will be added to the final stormwater management plan

**2) Applicant should be Required to use Native Plants in Landscaping:**

LFWA was pleased to see that the applicant was committed to saving the large sycamore tree. This area has very few trees and saving this 30 inch tree is important. We support the recommendation for a variance (Staff Recommendation, page 31).

The staff also recommends that the tree list be expanded to specify more native trees (pg 14, Landscaping (9.c)). We would like to see **ONLY** native trees planted in this area. Montgomery County, through its tree and RainScapes programs, has a strong commitment to restoring our native trees. Since our native birds and insects depend on native plants, it is important that this site be required to plant only native trees.

We would also like to see only native plants used in the landscaping areas between the existing retaining wall and north side of the proposed building (pg 14, Landscaping (9.d)). Again, our native birds and insects depend on native plants for food. They cannot eat non-natives. With a huge variety of native plants to choose from, it should not be a hardship on the applicant to only plant natives. The County RainScapes program has great resources if they need advice.

**We have this One Chance to Do it Right:**

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