

# AUDUBON NATURALIST SOCIETY

*Connecting people with nature in the DC region*



July 22, 2014

Council President Craig Rice and Councilmembers  
Montgomery County Council  
100 Maryland Ave  
Rockville, MD

Re: White Oak Science Gateway Plan

Dear Council President Rice and Councilmembers,

The Audubon Naturalist Society, on behalf of our more than 6000 members and supporters, works to educate and mobilize residents to protect and restore their local streams and watersheds. One of our longstanding commitments is to help restore the Anacostia River and its tributaries in Montgomery and Prince George's Counties. Restoration includes correcting past harms and preventing new harms.

We support the overall goal of beneficial redevelopment that when done in a careful manner, revitalizes older commercial areas and brings in additional employment that is well-served by transit. We have supported other master plans, such as Tysons Corner in Fairfax County, that achieve this careful combination of densification with transit service, accessible parkland and restored streams. Though there are some useful environmental goals in the draft WOSG plan, there remain serious gaps:

- The plan does not address Montgomery County's need to comply with the stormwater permit's requirement to meet all Total Maximum Daily Loads (TMDLs) for the Anacostia portion of the County – including in the Paint Branch watershed which is where the bulk of the WOSG properties are located, along with Northwest Branch and Little Paint Branch, where some of the sector plan properties are located.

- The plan discusses tree canopy issues, but much more on this is needed in terms of accurate tree canopy statistics, establishing an effective reforestation and tree canopy increase goal (such as that suggested in the Planning Department's tree canopy study conducted with the University of Vermont) and creating a plan to meet that goal that is segmented out, with property-specific goals.

- The WOSG's proposal for high-density growth, combined with the lack of a serious, detailed transit plan means traffic-related pollution of air, land, and water, and damages to public health, will increase;

- The plan does not adequately recognize or seek to remedy, existing water quality problems left from past development in the Sector Plan area – such as the notorious "Grand Canyon of Paint Branch."

## **Montgomery County MS-4 implementation**

- o Anacostia Total Maximum Daily Loads (TMDLs) - There are a total of seven TMDLs that affect the Anacostia river, including its tributary Paint Branch within which most of this Sector plan is located. (Other Anacostia tributaries included in this Sector

Plan include portions of Northwest Branch and Little Paint Branch.) As required under the federal Clean Water Act and implemented through permits including Montgomery’s stormwater (MS-4) permit, TMDLs require “ratcheting down” on pollutants that are preventing the public’s use and enjoyment of our waterbodies.

- How will the buildout of this Sector Plan affect the Anacostia restoration efforts – will it contribute to the attainment of these required pollutant load reductions, or will it worsen pollution problems and the associated degradation of Paint Branch and the Anacostia? If it will contribute to the attainment of these load reductions, how will it accomplish that reduction? The current sector plan draft does not confront this environmental imperative and so it is lacking in adequacy of vision, goals, objectives, and property-specific requirements for going beyond compliance with use of Environmental Site Design (ESD) and in what’s needed by way of applying green stormwater retrofit practices.
- Anacostia Restoration Plan – the Anacostia Restoration Plan is a 10-year, watershed-wide plan, commissioned by Congress and led by the Army Corps of Engineers with extensive local input from Montgomery County DEP and other stakeholders. This ARP includes Subwatershed-by-Subwatershed restoration project inventories, including for Paint Branch, Northwest Branch and Little Paint Branch. The commitment by Montgomery County along with the other ARP partners is to complete the building of these restoration projects by 2020. We request that the ARP and its specific project inventories be integrated into the WOSG plan such that maximum synergy of redevelopment plus completion of the restoration projects is attained.
- We request that final approval of this Sector Plan be delayed until the answers to these questions are known, through further work to flesh out exactly how the damages from additional imperviousness will be prevented through leading-edge ESD, and how the considerable existing damage from runoff from existing imperviousness will be remedied.

**Tree Canopy and reforestation aspects.** A Planning Department study in conjunction with the University of Vermont, conducted in 2011, puts the East County Science Center area’s Tree Canopy coverage at 24%. The planners estimated that possible future tree canopy coverage for this sector plan area is 30% - meaning that a 6% increase in tree canopy coverage is possible (and we’d add, necessary to meeting our stormwater permit and quality of life goals). (source: Jarlath O’Neill-Dunne, March 2011, A Report on the Montgomery County’s Existing and Possible Tree Canopy, U-VT Spatial Analysis Lab.) [http://www.montgomeryplanning.org/environment/documents/TreeCanopy\\_Report\\_MontgomeryCountyFinal.pdf](http://www.montgomeryplanning.org/environment/documents/TreeCanopy_Report_MontgomeryCountyFinal.pdf)

- How does this information reconcile with the “existing” 50 percent tree cover figure on page 70 of the WOSG plan? We request that this discrepancy be investigated and reconciled, and that firm reforestation and tree canopy expansion goals be established for this plan and reflected in each of the properties included in the plan.

- For instance, the plan's discussion of the Labor College site gives a staff recommendation for "retaining the existing trees on the site to serve as a buffer" for the adjacent residential community. While this is an important goal, it must be coupled with a requirement for additional tree canopy to be added to this site in order to contribute to the overall tree canopy expansion goal that we request for the WOSG plan.

**Increased density without transit will increase pollution of the waterways, air and land of White Oak.**

As has been noted by Carole Ann Barth of North Four Corners Citizens Association, this plan "will be twice as much urban area as downtown Silver Spring, but with no metro service." **This is unacceptable.** We oppose plans that increase density without simultaneously providing adequate infrastructure -- including adequate transit. The Bus Rapid Transit service that has been discussed thus far does not instill public confidence that it will be adequate to address both current and future needs.

**Uncontrolled or poorly-controlled impervious surfaces built in the past are causing massive erosion problems today.** The WOSG does not state its strategy for remedying these existing problems and for preventing future problems of this kind.

- Paint Branch Stream Valley Park West of route 29 and south of Tech Road is a beautiful wooded park, but it is also significantly degraded from uncontrolled runoff from the impervious surfaces of commercial, industrial and residential areas. Much of this area as discussed in the plan is comprised of the 20-acre parcel acquired by Spectrum Partners.
- This uncontrolled and poorly-controlled runoff has gouged a series of deep gullies into the wooded hillslopes adjacent to Paint Branch.
- While the White Oak Science Gateway plan states on page 70 that it intends to "preserve and restore stream valley buffers in the forest," without more specifics at this stage of plan creation, this good intention may not be realized.
- How will the buildout of this Sector Plan contribute to the fixing of these age-old damages caused by unmitigated runoff: deeply-incised gullies dumping tons of sediment into Paint Branch and the lower Anacostia?

We join with the civic leaders who have raised serious concerns about this plan as now drafted. Until these questions and related concerns are adequately addressed, Audubon Naturalist Society cannot support the White Oak Science Gateway Plan.

Thank you for considering our views,

Yours truly,



Diane Cameron, Conservation Program Director, Audubon Naturalist Society