



LITTLE FALLS WATERSHED ALLIANCE

EDUCATION - ACTION - STEWARDSHIP

Sarah Morse
Executive Director

Comments from Little Falls Watershed Alliance
Right-of-way Abandonment, AB-773, Portions of Westbard Avenue and Ridgefield Road

Board of Directors:

November 17, 2020

Jack Sobel
President

Dear Planning Commissions and Staff,

Mikel Moore
Vice President

Little Falls Watershed Alliance is an environmental stewardship group for the Little Falls watershed, a sub-watershed of the Potomac located in the Bethesda-Chevy Chase area of Montgomery County. We have been actively protecting our natural areas since we incorporated as a non-profit in 2008. With over 2,000 members, we engage more than 1,000 volunteers every year in stewardship projects like habitat restoration, stormwater management installations and trash clean-ups.

Sara Schneeberg
Robinson
Secretary

Jonathan Breul
Treasurer

Laurie Fink

Randy Lyon

Karen Thornton

George Wyeth

Green Infrastructure for the Health of the New Stream

As the new development at Westbard is in our watershed and along the banks of the Willett Branch, we have been following the proposed projects since the initial meetings to revamp the Westbard Sector Plan. Along with making sure that the developers follow the strictest application of the County's excellent environmental guidelines, we have an active interest in the formation of the Willett Branch Stream Valley park and the naturalization of the Willett Branch. It promises to be a jewel for Montgomery County and a national model on how to restore urban streams. All new development and redevelopment in the area will impact the stream. It is our hope that Westbard redevelopment will be done in such a way to maximize the health of the new stream and that stormwater management for the area will be entirely Environmental Site Design (ESD). The green methods of ESD will protect the new stream from flooding and make sure that the ground water is properly recharged to give the stream a healthy base flow.

Board@lfa.org

New Road Must have 100% ESD Stormwater Management

When the preliminary plans were approved last year, the Department of Permitting Services (DPS) allowed the developer to treat only 16% of the road run-off despite the county's commitment to treating stormwater on site. As you know, the run-off from a road is the most damaging run-off a stream can experience. As the rain water rushes down the pavement, it picks up what the National Academy of Science calls "a toxic brew of oil, fertilizers and trash". Without stormwater management, this mixture flows



directly to the stream, both flooding the stream and polluting it with trash, oil, chemicals, and other road debris. So, it is essential that the road be treated with the greenest infrastructure techniques.

It is with the health of the new park in mind that we offer these comments and ask that the petition be denied.

- **Proposed Abandon Areas Should be Used for Stormwater Management**

The staff recommendation states that the areas petitioned for abandonment are “no longer necessary for public use.” However, the areas are located along the new road and could be used for achieving 100% stormwater management for the new road. The developer was granted the large waiver for treating stormwater because it was stated that there no room for stormwater management in the right-of-way of the proposed re-aligned road. Lack of ROW makes the need for these areas even more essential. This road is located uphill from the new stream and every bit of the water from a storm will flow directly into the stream. With recent rain events flooding roadways and basements, we all know what happens when stormwater can't be absorbed into the ground. **These abandoned areas are necessary for public use.** It is in the interest not only of the stream, but of the surrounding residences, that water is captured and directed into the ground and not allowed to flood the area.

- **Water Feature for the New Willett Branch Park needs to be Addressed with New Road**

An important part of the new Willett Branch Stream Valley Park is the gateway park at River and Ridgefield and the daylighting of the Kenwood Tributary with a small water feature. The Kenwood Tributary is channelized now and flows under Ridgefield Road and into the Willett Branch via a 36-inch concrete pipe. If left to enter the stream in a pipe, the volume and velocity of water will create a tsunami of water every time it rains destroying the new stream. The water feature will slow down and spread out the inflow, saving the stream banks from erosion. However, the infrastructure of the new water feature starts under Ridgefield Road. This part of the park should be coordinated with the building of the new road. Until these details are worked out, the request for abandonment should be deferred.

Vision for Park is for Generations to Come

There is little sense in putting millions of dollars into naturalizing the stream if stormwater is allowed to compromise its health. We know from past rain events the damage unchecked stormwater can do. We must not let that happen here. The right-of-way should not be abandoned, but used for stormwater management – a use that will benefit the entire community as well as the stream.

The Willett Branch Park is a vision for today and tomorrow. The new stream will delight future generations and hopefully our grandchildren's children will be playing in the sparkling water and enjoying the trails. This is our chance to get it right. There is no do over.

Thank you for your hard work on this,



Sarah Morse