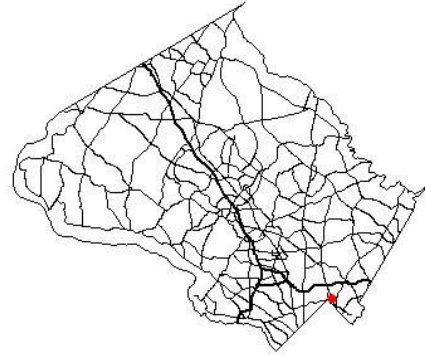




MONTGOMERY COUNTY PLANNING DEPARTMENT
THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION

MCPB
9/04/08
Item #8

MEMORANDUM



DATE: August 27, 2008

TO: Montgomery County Planning Board

FROM: Rollin Stanley, Director

SUBJECT: Planning Board Work Session and Action
on the Public Hearing Draft Amendment to the Master Plan for
Historic Preservation – Falkland Apartments

Recommendation

Subsequent to the July 10, 2008 Public Hearing on the Draft Amendment to the Master Plan for Historic Preservation, the recommendation outlined in the planning staff report dated July 2, 2008, remains as follows.

1. That concerning the designation of the Falkland Apartments to the Master Plan for Historic Preservation, the Planning Board recommend to the County Council that:
 - i. the two parcels located south of East-West Highway be placed on the Master Plan for Historic Preservation; and
 - ii. the parcel located north of East-West Highway (the “north parcel”), not be placed on the Master Plan for Historic Preservation;
2. That the Planning Board adopt a motion that the north parcel will be removed from the Locational Atlas automatically upon approval of a Site Plan application or applications for the redevelopment of the entire north parcel. In the event more than one site plan is filed for the north parcel, that parcel will only be removed from the Locational Atlas with approval of the certified site plan covering the last portion of the north parcel for which no certified site plan has been approved.

1.0 Background

On July 10, 2008, the Planning Board held a public hearing on the Public Hearing Draft Amendment to the Master Plan for Historic Preservation for the Falkland Apartments. The public hearing record remained open until July 31, 2008. A detailed matrix summarizing and responding to public hearing testimony is attached.

Department staff has considered the information submitted at that hearing and has summarized the comments in the appendix (see Appendix 1). After considering the comments and discussion, staff is supporting the recommendations contained in the July 2, 2008 report submitted to the Board.

Department staff believes the benefits of replacing the buildings on the north parcel of the subject site with primarily residential buildings at a greater density achieves a higher level of public interest than would preservation of the entire remaining blocks of the Falkland Apartments. Staff also continues to support placing the two blocks south of East West Highway on the Master Plan for Historic Preservation.

2.0 Public Testimony Summary

Although this case is an Amendment to the Master Plan for Historic Preservation, it has raised a variety of issues including the following.

- historic preservation
- smart growth / development near transit
- affordable / workforce housing
- public amenities
- master plan compliance

2.1 Historic Significance

Several speakers addressed the historic relevance of the Falkland Apartments, both as a complex and as individual blocks. The owners' representatives did attempt to make the case that the buildings on the north parcel lacked the historic merit of those on the other blocks. Staff continues to believe that the buildings on all three blocks are eligible for historic designation.

Supporters of full preservation of all the remaining blocks noted the value of preserving as much of the apartment complex as possible to maintain the overall historical integrity of the site. Views were expressed that further demolition of the buildings would compromise the character of the development as conceived and constructed.

Other speakers noted that East – West Highway presented a significant barrier that already divided the apartment complex into two distinct portions and that designating the two south blocks was a positive development.

The decision in the past by both the Board and the County Council not to designate any of the site other than the Cupola Building was discussed. A speaker linked this to the current master plan provision respecting the full complex as well as the specific provisions relating to the north parcel and calling for its redevelopment. The speaker noted that these decisions were linked when the early 1990s Sector Plan was prepared and approved, confirming the full redevelopment potential of the north parcel.

2.2 Affordable Housing / Smart Growth

Several speakers addressed the need for affordable housing, particularly in close proximity to the metro station in downtown Silver Spring. Redevelopment of the north parcel to create more dwelling units was viewed as a positive step toward achieving more housing offering a range of unit sizes and pricing. The “transit oriented development” presented by the redevelopment option was supported as meeting several goals for smart growth on a unique site adjacent to the subway line.

Two speakers addressed the current rent supplement units and the longevity of those requirements. It was pointed out that the terms of these units would be extended. Further that workforce housing would be provided in a new development despite those units not being required.

Other speakers noted that additional rental housing itself would help to reduce housing costs in downtown Silver Spring.

Speakers opposed to redevelopment of the north parcel indicated their belief that the existing units offered “affordable” alternatives for persons of lower incomes. This issue was addressed by the owner of the Falkland Apartments, who provided information showing that the units were not lower priced.

There was also some discussion about the nature of the units. One speaker living on the north parcel spoke about the benefits of screened porches and other features, while another resident spoke of a small cramped space with little of the amenities considered important in current residential design.

Several of the speakers opposing any redevelopment of the north parcel suggested that while they understood the need for more affordable units, it was their belief that the current building provided plenty of affordable units, in a historic setting. There were varying opinions expressed concerning the interior of the units. While the rents for the units are fairly low, the small rooms and lack of modern amenities did not create affordable “desirable” living spaces.

Another speaker noted that the existing green area and housing rendered this space “sustainable,” citing this as a priority over smart growth. A second speaker added that in their opinion smart growth is not simply about adding density at transit. Rather, it is about developing communities around transit that have variety of form, beauty of architecture and open spaces, and a sense of place. They argued that retaining the existing buildings would be consistent with smart growth.

2.3 Public Amenities

Speakers noted the desirability of bringing retail into the area to meet the needs of a growing residential population. The jobs associated with this new retail were cited as a positive benefit.

Speakers had varying opinions on the amount of open space. Those in favor of preserving all three blocks noted the green space on the north parcel as an important feature of the existing complex. Speakers favoring redevelopment of the north parcel noted that the amount of open area could exceed the 20% requirement of the zoning ordinance and that the current central green space would be enhanced and designed for accessibility.

The enhancement of other green spaces on the south parcels was briefly mentioned, indicating the willingness of the owner to invest in providing public accessibility to various parts of the complex and enhancing the public experience.

A representative of the owner noted the commitment of the owner to provide a mix of unit types, to provide for a range of “tenure” from singles to families. The representative added that the overall rental structure would provide for rents less than the average price in downtown Silver Spring.

2.4 Master Plan Compliance

The staff report was referred to by a speaker, noting that as far back as the early 1990s the Sector Plan outlined the redevelopment scenario for the north parcel. The applicant’s representatives also addressed the wording of the Master Plan for Historic Preservation, citing the necessity for the Board to consider all merits of an application and to weigh the benefits of historic preservation aspects against other public benefits in determining whether or not to recommend designation.

3.0 Conclusion

The Planning Board is faced with the challenge of weighing the benefits of historic preservation and those of other public objectives. The Planning report represents the opinion that the Sector Plan has consistently identified the north parcel for redevelopment, even describing the form of the new buildings. The current zoning of the property allows for the master plan vision to be implemented.

The proposed designation of the two southern blocks is a strong commitment to the preservation of a significant portion of the project. The recommendations presented in this report are the same as those set out in the report sent to the Board in July.

The Planning Department recommends that the buildings on the north parcel be replaced with new construction and are aware of the impact of the demolition. This recommendation is made in consideration of both the Master Plan for Historic Preservation, the Sector Plan and general public objectives such as utilizing existing transit infrastructure. “[B]alancing the importance of the historic property with other public interests,” especially the need for affordable housing and housing in general near transit stations, the Department believes that allowing the redevelopment of the north parcel and preserving the two south parcels will achieve a higher level of public interest than would preservation of all three parcels.

The buildings on the south and west parcels should be placed on the Master Plan for Historic Preservation.

Next Steps

The Planning Board must make a recommendation to the County Council (in accordance with Chapter 33A) in the form of a Planning Board Draft Amendment. The Department recommends that the north parcel not be designated in the Master Plan for Historic Preservation and that the south and west parcels be designated. Staff believes this recommendation best conforms to the Sector Plan objectives expressed as far back as 1993. Upon receiving the recommendation of the Planning Board, the County Council will make the final decision on whether the Falkland Apartments are designated for all three blocks, a portion of the site, or not at all.

To ensure the public benefits we anticipate will be achieved through redevelopment of the site are realized, we recommend that the Planning Board vote that the north parcel be removed from the Locational Atlas automatically upon approval of a Site Plan application or applications, for the redevelopment of the entire north parcel. In the event more than one site plan is filed for the north parcel, that parcel will only be removed from the Locational Atlas with approval of the certified site plan covering the last portion of the north parcel for which no certified site plan has been approved.

#	SPEAKER	ISSUES RAISED	STAFF RESPONSE
Historic Preservation Commission			
1	Jef Fuller, HPC Chair	The Historic Preservation Commission supports designation of all three parcels of Falkland Apartments. Historic preservation is in the interest of the public.	The comments support designation of all 3 blocks.
2	David Rotenstein Commissioner	Public interest is synonymous with preservation of Falkland Apartments. Historic documents substantiate that the three parcels share a unified vision for a single apartment complex.	
3	Caroline Alderson Commissioner	Falkland Apartments are unique as the earliest garden apartment complex in the state. They have good integrity--as with National Park Seminary, alterations can be peeled away. The context of Silver Spring is different than 20 years ago, the apartments differentiate the community character from surrounding areas. Chairman Hanson: If the north parcel were redeveloped, would it so impair the resource that the other parcels wouldn't be worth saving?	
Nominators			
4	Mary Reardon Preservation Chair, Silver Spring Historical Society	Supports designation of all three Falkland parcels. Preservation is not about nostalgia, but about keeping what's valuable in the built environment. Need for county to prevent loss of existing affordable housing, and institute rent control. Not all metro stops need high rises, even more important is to preserve lower scale at the Silver Spring metro. If we lost the north parcel, the MHT found it would no longer be eligible for listing on the National Register of Historic Places.	The comments support designation of all 3 blocks.
5	Eileen McGuckian, Citizen/Former HPC member	Urges planners to protect and encourage variety in the built environment by designating all three parcels. The Falkland Apartments provide a sense of place in Silver Spring. Preserve the tout ensemble, for the whole is greater than the sum of its parts.	

10	Barbara Sears, Linowes & Blocher	<p>The south parcel merits historic designation as an example of the garden apartment movement. The north and west parcels do not merit designation for they do not exhibit the characteristics of the garden apartment movement.</p> <p>Not designating the north parcel is in compliance with the Silver Spring Sector Plans of 1993 and 2000.</p> <p>Since 1975, the property has been recommended for development. The Board and Council have consistently reaffirmed the decision made not to designate any of the Falkland Apartments except the Cupola Building.</p>	<p>The Falkland Apts were one project built in two stages. The complex is significant in the garden apartment movement. All three parcels merit designation, having been designed by the same architect, built by the same developer, and constructed within a two year period. Staff believe the full site is eligible. The question is whether or not the preservation of the structures outweighs the other public benefits discussed in the report.</p> <p>The Falkland Apartments were placed on the Locational Atlas in 2003, after the Sector Plan was adopted. The Sector Plan however has consistently indicated and described the full redevelopment of the north parcel. The proposed redevelopment of the north parcel would comply with the vision of the Sector Plan as well as the zoning that was brought into place as a result of that Plan. preservation of the two south blocks would also comply.</p> <p>The Falkland Apts were turned down for designation over 20 years ago by both the planning Board and County Council. Development of the north parcel was supported through two sector plan processes. Since then, historic research in downtown Silver Spring has identified historic resources.</p>
11	Kate Kuranda Goodwin & Assoc	<p>Falkland Apartments represents two separate projects with separate finance structure, site design, and architecture. One project, the south parcel, merits designation. The north parcel is more typical of many other garden apartments and does not merit designation. The north parcel has lost more of its integrity than the south parcel, and stands to lose additional integrity when buildings are demolished for the Purple Line.</p>	<p>The Falkland Apartments are significant for being a comprehensively planned garden apartment complex. As shown graphically at the hearing by staff, all three parcels share design elements in plan and architectural detail. All three parcels are equally significant in terms of history and architecture. The impact of the Purple Line on the project has been debated and will result in the demolition of some of the buildings on the north parcel. The SHA has found it will not have a significant impact.</p>

12	Ward Bucher Architect	<p>The unique design and geography apply only to the south parcel, not the north and west.</p> <p>Criteria cited for designation is incorrect--no historic events occurred on north and west parcel.</p>	<p>The entire complex merits designation based on its combined history and architecture.</p> <p>The Draft Amendment cites three criteria met by the Falkland Apartments: 1a, 1d and 2a. It does not cite 1b (identified with a significant historic event).</p>
13	Don Hague Home Properties	<p>The redevelopment of the north parcel would result in 282 affordable housing units, 133 MPDUs and 100 workforce housing units. In addition, 49 rent supplement apts will be located in White Oak. If redeveloped, total housing units would increase from 450 to 1,327. The existing North Parcel has only 1- and 2-bedroom apts. Redevelopment would also have at least 10% studios and 7.5% 3-bedroom apts. Home Properties estimates at least 75-80% of new units will be affordable, being 750-800 units.</p> <p>New housing will provide diversity of housing types and income levels, will have lower rents than currently available in Silver Spring. Without redevelopment, the 90 bond units will go to market rents in 2014.</p> <p>The redevelopment plan will include restoration of the South Parcel Park.</p>	<p>The applicant showed the current rents of the complex. The per square foot costs are not all affordable. The small units offer sparse amenities compared to newer units. The rent supplement units are the only affordable units and those are scheduled to go out of rent restriction in five years. While the applicant is proposing a boost in guaranteed workforce house (not required) and affordable housing, the remaining units could rise to market rates. However, brining an increase in the number of the units into the market place does help stabilize rents by creating more supply. The owner has indicated the project would be phased which could restrict rental unit supply in the short term, however, the ultimate build out should help both the supply and affordability of units in downtown Silver Spring.</p> <p>The existing Falkland Apartments provide a specific housing type, rather than a diversity of units. The owner has indicated that the interior of the units limit the flexibility in providing better space meeting demands for things like larger rooms, storage space and other amenities. The amount of green space is proposed to be retained and enhanced with both family sized and accessible units being placed at grade offering direct access to green areas. The number of grade related units would be increased.</p> <p>The potential exists on both north and south parcels to enhance the stream valley that spans East-West Highway and to make both sections visible and accessible to the public.</p>

13	<p>Don Hague Home Properties</p> <p>Commissioner Presley: In the existing north parcel, rent for 1-2 bedroom apts is \$1237-1570. What would be available in that range in the proposed redevelopment?</p> <p>Commissioner Presley: Workforce apts now in high demand are 3 BR units. Those are at 1564 under mpdu. Is there an equivalent to that?</p>	<p>Redevelopment will bring new retail including a grocery store to Silver Spring. New development will be transit-oriented.</p> <p>Owner would dedicate future Purple Line ROW at no cost if north parcel not designated. If the north parcel were designated historic, Home Properties would need to be compensated for land and Purple Line impact.</p> <p>Only efficiencies would be available at that rate. But there would be 133 MPDUs and 50 workforce housing including 70% of median income, below market rate. New units on average would be larger than on redeveloped north parcel.</p> <p>There is no equivalent to that in the redevelopment plan. There are 3 bedroom townhouses on the south parcel that would be preserved.</p>	<p>Mixed use development is the cornerstone for future infill opportunities throughout the county, at varying scales. Full redevelopment of the site presents an opportunity for a large retail, in this case grocery store, to be placed below grade and with reduced parking as the uses would cater to the large residential population on site.</p> <p>This is a valid point. The return on full redevelopment of the north parcel could offset the loss of the land to the developer, resulting in donation of the Purple Line right of way. Retaining a low number of units on the site does not offer the same level of return, which the owner indicates would mean the necessary right of way would have to be purchased. Preservation staff finds that the value of preserving the entire Falkland complex would outweigh the public cost of the Purple Line impact, including acquiring the right of way.</p> <p>As noted above, the proposed units not subject to MPDUs, workforce housing or rent supplemental agreements, could have rents equal to other buildings in Silver Springs. However, more units tends to moderate prices through a greater supply.</p> <p>The owner has committed to providing 7.5% of the units constructed as three bedroom units. This would be 100 units at full build out. Further discussions are necessary to determine how many of these would be affordable.</p>
14	Trini Rodriguez architect	New development project would have streetscape, green space, a courtyard. A variety of buildings would step down to East-West Hwy. The south parcel park would be public open space.	The design of the proposed buildings on the north parcel meet the Sector Plan description for redevelopment of the site.

15	<p>Nelson Leenhous</p> <p>Commissioner Presley: Do you have a current plan to control erosion that is separate from the redevelopment plan?</p>	<p>The large redevelopment project would be carried out in several phases. Home Properties is an experienced company with demonstrated commitment to Silver Spring.</p> <p>We have been working on erosion issue over the years. The rush of water from the north parcel makes it difficult. The redevelopment plan is to hold the water back and release it slowly.</p>	<p>Just as Home Properties would consider a phased approach to a new project in challenging economic times, so Falklands developers, in a Post-Depression economy, planned the project in phases. Both the first and second phases of the Falkland development are significant.</p> <p>Environmental staff do not consider the depression on the north parcel has having any environmental significance. The proposed enhancement of the stream valley on the south parcel, would be part of the redevelopment plan for the north parcel.</p>
Government Officials			
18	Rick Nelson, for County Executive	County Executive policy goals providing increased density in transit areas and affordable housing units. North parcel without redevelopment have no controls and by 2014 will be market rents. Rising rents in the Silver Spring area so units won't be affordable for current or future tenants. Exec supports designation of south and west parcels.	Increased density near transit stops and affordable housing are important goals. The staff report considers these public objectives as part of the overall public amenities that outweigh the advantages of preserving the north block buildings. Preservation of the two south parcels would be guaranteed. Preservation staff believe the significance of the historic resource outweighs these objectives.
Opposing Designation			
17	Sharon London, Montgomery County Coalition for the Homeless	Significant affordable housing units would be created in redevelopment of Falkland Apartments. The county is in a housing crisis. The redevelopment would add 133 mpdu and 100 workforce apts.	According to housing staff, there is no significant gain in affordable housing in the redevelopment proposal.
19	Norman Dreyfuss, Citizen	Preservation of north parcel would make transit solutions more difficult. Purple line would require more than knocking down part of one building. Impact would likely be even greater.	Historic designation of the north parcel would require extra care in the design and construction of the Purple Line.

20	Keith Reed Miller, Harris Teeter	Supports redevelopment of north parcel. Would provide opportunity for Harris Teeter services and additional retail and would provide benefits of jobs, county revenue, and education funds.	The staff report considers the connection of retail opportunities with housing an important public objective. While on it's own it may not justify full development of the north parcel, in combination with the other public objectives offered through the redevelopment the merits of full redevelopment outweigh the aspects of full preservation.
24	David Nicholson, Resident	Supports redevelopment. Need for affordable housing. Original purpose of Falklands was for affordable housing. Units need replacement. Teachers need good affordable housing. This could be a model for public-private partnership. Apartments were inadequate when he looked at them 20 years ago and they're no bargain today.	Speakers addressed the existing interior spaces offered on the north parcel. Opinions varied on the suitability of the spaces with people speaking favorably about the small spaces and others were critical of the inefficient spaces.
25	Robert Goldman, Mont Housing Partnership	Redevelopment of Falkland Apartments will help the County which is in a housing crisis. Replacement housing of existing 182 units plus 100 units workforce units even though it is not a requirement.	As noted earlier, additional affordable housing would be achieved through full redevelopment of the north parcel. The addition of 100 workforce housing units is not a requirement, it is an amenity being offered by the owner. Staff are satisfied that more affordable housing can be achieved through full redevelopment than preserving the existing buildings.
29	Meghan Moriarty, Resident	Opposes designation of the north parcel. Preserving existing units on north parcel won't increase affordable units that are in great need. Preservation of the south two parcels would provide balance.	Preservation staff are concerned that building new units on the north parcel will compromise integrity of the remaining blocks on the south side of Zeast - West Highway. The highway represents a considerable physical break in the landscaped, coupled with the elevation of the buildings on the north parcel. The impact of 1,000 new units on the rent values of the remaining units in the historic buildings remains to be seen. However, considering the nature of the smaller spaces offering fewer interior amenities and the large addition of 1,000 units to the downtown rental market, it would seem likely that the existing units would remain lower in price than the new units.

30	Deborah Mines, Washington Smart Growth Alliance	Jury reviewed the redevelopment project recognized the Falkland proposal has smart growth features: walkable to downtown. Grocery store is valuable amenity. Public plaza needed for Silver Spring. Green roof over garage is good for the environment. Affordable units integrated with market rate units in project. And developer will help displaced residents.	Historic preservation is a significant component of any successful Smart Growth and sustainable development program. Environmental benefits include preserving the stream valley, mature trees, and existing construction materials. All of these advantages are proposed as part of the full redevelopment option. Two blocks of historic structures would be maintained; the stream valley restored on the south parcel; public access enhanced into the green area; native plantings would be enhanced. Many of the existing trees on the north parcel would be replaced with native species. Several of the existing trees are not native to the area.
31	Patty Kaczmarek, Action in Montgomery	Supports redevelopment of north parcel to add affordable housing to the county. Working class people were first residents of Falkland Apts. Maintain south and west parcels.	Staff agrees that there is a great need for affordable housing in Montgomery County. There are other sites in and near the Silver Spring CBD that could also provide additional housing, without removing existing units from the market. However, the number of these sites has dwindled and the downtown area needs additional units and services to help keep housing costs down.
32	Rebecca Brillhart, Action in Montgomery	Significant loss of affordable housing in the county. Need a new deal for housing that county employees and others can afford to own a house in the community in which they live.	
35	Dick Pavlin, Action in Montgomery	Need to balance historic preservation with development. Not all 182 units are currently occupied. Recent residents moved in with awareness that development plans were in the works. There will be 282 affordable units vs. existing 182 moderately priced units.	
Supporting Designation			
16	Joshua Folb Falkland Resident	Historic UVA lawn dorms have high appeal despite small size and lack of plumbing. Families want to live at Falklands as they did 70 years ago. Preserve all of Falkland Apartments. Concerned about traffic that would be introduced with increased density and shopping on this site.	The UVA lawn dorms were designed by Thomas Jefferson. Over their history they have been occupied by the likes of Edgar Allan Poe and William Faulkner. Students choose to live in these spaces for the history they represent and the people who have resided there. The buildings are one storey in height and are transient in nature. The Falklands have none of these aspects, so the comparison is not practical. The two places have little in common.

21	Jerry McCoy Silver Spring Historical Society	Silver Spring CBD survey resulted in Falklands addition to Locational Atlas. Owner knew Falklands was on the Atlas when he acquired the property. Leading preservationists and architectural historians support designation of all three parcels. Falkland is significant for being a New Deal prototype for moderate housing, and part of multifamily garden apartments.	The owner had the property under contract prior to the listing on the Locational Atlas.
22	George French	Residents have fought to preserve Falklands since the 1970s. Silver Theatre and downtown Takoma Park are examples of low scale historic buildings that are near Metro stations and have been preserved.	The Council and Planning Board have supported full redevelopment of the north parcel since the 1992 Sector Plan.
23	Jim Humphrey, Mont Co Civic Federation	<p>1.Supports preservation of all three parcels of the Falklands. This is in agreement with objectives of the General Plan:</p> <ul style="list-style-type: none"> -Environmental objectives call for preservation of open spaces, protect stream valleys, and protect existing trees -Housing objectives to preserve existing affordable housing whenever possible. <p>2. Planning Director did not draft an Amendment as instructed by the Board, but is instead urging a reconsideration of a finding that the Board already made.</p>	The Sector Plan clearly identifies full redevelopment of the north parcel, describing how the development would be massed. The objectives referred to in this comment would be achieved through the redevelopment proposal. Over 20% of the north parcel would be open space; the stream valley on the south parcel would be restored and enhanced and Planning staff did generate an Amendment to the Master Plan for Historic Preservation as directed by the Board. The Board made a finding of eligibility in December 2007 under Chap 24A-10. The result of the current review is of a Master Plan Amendment and will result in a recommendation to the County Council regarding designation. Chairman Hanson pointed out in response that the staff were reporting as required
26	Wayne Goldstein Montgomery Preservation Inc.	The Board should not use an interpretation of the Silver Spring Sector Plan as the basis for turning down designation of the Falkland Apartments. There are 6410 units proposed, possibly 4000 could be built as infill. Is that not enough? Not necessary to redevelop this significant resource.	The Board is clearly charged with considering the merits of an application for designation with other public objectives. Public objectives are established through master plans and sector plans among others. The Sector Plan specifically addresses this site in considerable detail and has consistently done so for over 26 years to the extent that the north parcel was rezoned for full redevelopment. To ignore specific actions by both the County Council and the Planning Board, which resulted in a specific zoning designation that implements the objectives of the Sector Plan, would be negligent in terms of a staff planning report.

27	Marcie French	Silver Spring Sector plan states either St Charles or Falklands should be preserved. The St Charles is already lost, can't lose Falklands. Justement stated retention of Y-shaped stream valley, existing trees, living porches face open space and space for children stated in his book. He was an accomplished architect and pioneer in his field.	Open spaces are being enhanced and made publicly accessible.
28	Jane Bergwin Rand, Resident	Need to have a choice for people who seek this type of housing, not a vertical community as the Lenox Park Apts. Photos of north and south parcels show how the buildings share the same architectural features.	The proposal to redevelop the north parcel and preserve the other two parcels, achieves a diversity in housing types and unit sizes. There would be more ground floor related units in the full build out of the north parcel within a range of building sizes and heights.
33	Nancy Weber	The AIM figures on net gain of affordable housing is inaccurate. Falklands is the last trace of green space in Silver Spring outside of Jessup Blair.	Falkland green area would be enhanced, both on the south parcels where the owner would restore the stream valley, create public entrances and open the space up to the general public. On a redeveloped north parcel, the development would exceed the minimum requirement of 20%. The current green space on the north parcel is not publicly accessible. Much of the "green" character is lost in many cars that line the curbs of the driveways and the parking lots. A new development would create underground parking, reducing the amount of hardscape at grade, and opening views to the green areas.
34	Felicia Eberling Colespring Plaza Tenants Assn	Supports designation of Falkland Apts. Destruction of existing buildings is not about affordable housing. Need rent stabilization to maintain affordable housing.	
36	Joyce Nalewijk Seven Oaks Citizens Assn	Preserve entire complex in its existing form. Redevelopment would lose landmark and increase density, have an impact on infrastructure and increase traffic. James Goode, expert on historic apartments in Washington DC cites value of Falklands.	
37	Carol Madsen, Resident	Recommends designation of all three parcels. Proximity to transit is not smart growth--it should be sustainable. Falklands is already vital, being home to diverse residents with green space and mature trees.	