



**Holton-Arms, Final Forest Conservation Plan Amendment, # CBA-1174C (in response to a violation)**

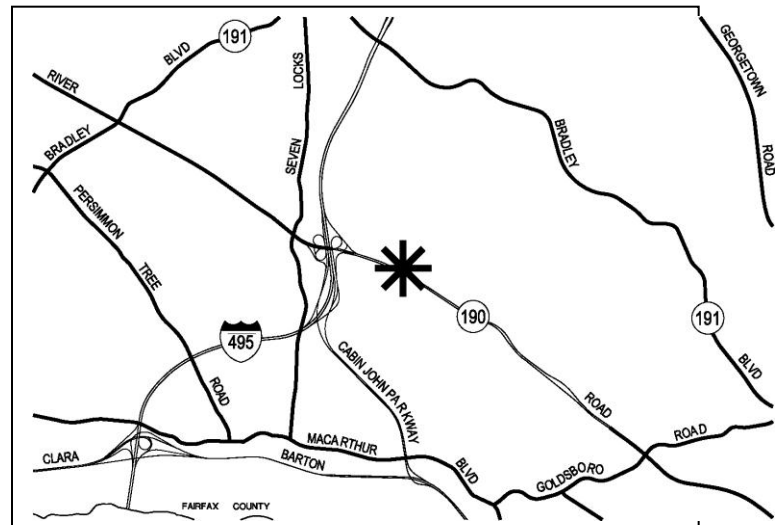
Marco Fuster, Senior Planner, Area 1, [Marco.Fuster@montgomeryplanning.org](mailto:Marco.Fuster@montgomeryplanning.org) 301.495.4521

*RAK*  Robert Kronenberg, Acting Chief Area 1, [Robert.Kronenberg@montgomeryplanning.org](mailto:Robert.Kronenberg@montgomeryplanning.org) 301.495.2187

Staff Report Date: 4-19-13

**Description**

- 7303 River Road, Bethesda MD, 20817
- 58.5 acres in the R-200 & R-90 zones, within the Bethesda Chevy Chase master plan area.
- Proposed abandonment of forest conservation easement areas, with 1:1 replacement onsite for high priority forest areas and 2:1 offsite replacement mitigation for part of the moderate priority forest.
- Application submitted on 4/23/2012
- Applicant: Holton-Arms School



**Summary**

- **Staff Recommendation: Approval with conditions**
- The application amends the previous forest conservation plans and corrects the associated encroachments.
- The application proposes the abandonment of approximately 1,660 sf of high priority conservation easement area within the Stream Valley Buffer with a 1:1 onsite replacement (inside the SVB). Approximately 20,642 sf of other onsite easements outside of the SVB are proposed for abandonment with mitigation comprised of onsite replacement at a 1:1 ratio and offsite replacement at a 2:1 ratio.
- The proposed plan will comprehensively address a variety of easement/forest conservation issues including existing violations, encroachments by others, access & maintenance conflicts and erosive conditions associated with Park runoff, by providing onsite and offsite mitigation, onsite restoration measures and other environmental enhancements.

**RECOMMENDATION:** Approval of the Final Forest Conservation Plan Amendment, subject to the following conditions:

1. Provide any invasive control, supplemental plantings and/or removal of encroaching features that may be needed to restore the new 1,170 sf easement area proposed near the School entrance.
2. Adjust the locations and increase quantities of the easement boundary posts on the Final Forest Conservation Plans to more appropriately delineate the easement areas, subject to Staff approval.
3. Coordinate with Staff to reduce the proposed LOD for the swale installation as feasible and adjust the associated tree protection and plantings accordingly.
4. The existing retaining wall and associated fill behind 8023 Summer Mill Court shall be removed from the School property to the extent possible without compromising the stability of the adjacent property.
5. Plan references of the split-rail fence installation shall consistently be specified for installation by the School rather than by adjoining owners.
6. A split rail fence shall be installed along the School boundary behind 8233 Burning Tree Road.
7. Timing of the Final Forest Conservation Plan approval and implementation of the plan shall be performed as follows:
  - a. A revised FFCP must be submitted by the applicant then approved by Staff prior to recordation of the easement.
  - b. The easement recordation must be completed no later than November 2, 2013.
  - c. The removal of encroachments within the Easement areas must begin no later than August 2, 2013 and must be completed by November 2, 2013.
  - d. Installation of the fence and signage must begin no later than August 2, 2013 and must be completed by November 2, 2013.
  - e. The invasive control work must begin as soon as possible but no later than August 2, 2013.
  - f. Swale installation shall be completed prior to the pre-planting meeting.
  - g. The tree and shrub plantings must be installed by December 1, 2013.
8. Submission and approval of financial security is required for the plantings, fence and signage specified on the FFCP; and the security must be approved by the M-NCPPC Associate General Counsel Office prior to any land disturbing activities occurring onsite.

9. The certificate of compliance for the off-site forest mitigation bank which satisfies the offsite mitigation requirements must be submitted by applicant, then approved by M-NCPPC Associate General Counsel Office prior to any land disturbing activities occurring onsite.
10. The revised Category I Easement boundaries must be recorded prior to land disturbing activities occurring onsite.
11. The applicant must submit a maintenance and management agreement and have it approved by staff prior to the forest conservation inspector accepting any planting.

## **SITE DESCRIPTION**

The subject property, shown in Image #1 below, is a platted parcel measuring approximately 58.5 acres. The property is located on the north side of River Road, and the main entrance is located approximately 1000 feet east of Burdette Road. The property contains a school and associated outbuildings and recreational facilities. The natural features onsite include Booze Creek stream which runs through and along the property. The stream is a major tributary of Cabin John Creek and is a use I-P watershed<sup>1</sup>. Forest areas, steep slopes, wetlands, floodplains and highly erodible soils occur within portions of the site. A number of rare, threatened and endangered plant species and watch-list species are also associated with the property (refer to appendix for details).

A local park borders the property on the east and an elementary school is located towards the southeast. The site is zoned R-200 on the north and west side of the stream, while areas south and east of the stream are in the R-90 zone.

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<sup>1</sup> Use I-P:

*WATER CONTACT RECREATION, PROTECTION OF AQUATIC LIFE, AND PUBLIC WATER SUPPLY*

*Waters that are suitable for: water contact sports: play and leisure time activities where the human body may come in direct contact with the surface water; fishing; the growth and propagation of fish (other than trout); other aquatic life, and wildlife; agricultural water supply; industrial water supply; and public water supply.*



**Image #1** Subject property and vicinity

NORTH ↑

## PROJECT HISTORY

The Holton-Arms school has been subject to numerous regulatory reviews including multiple final forest conservation plans. Onsite category I forest conservation easements have been established and consist of retained forest and reforestation plantings. (Refer to the appendix for a detailed outline of the project history). There are numerous issues associated with the easement areas which are comprehensively addressed by the current proposal. As recommended by staff all of the issues have been packaged under one application. The issues addressed are related to the following categories:

- Encroachments/excessive maintenance by the applicant within easement areas.
- Encroachments from adjacent residents.
- Lack of signage/fencing which appropriately delineates portions of the easements.
- Erosion within of easement area (near track bleachers).
- Access/maintenance issues for WSSC personnel.
- Unsuccessful reforestation plantings.
- Invasive plant species.

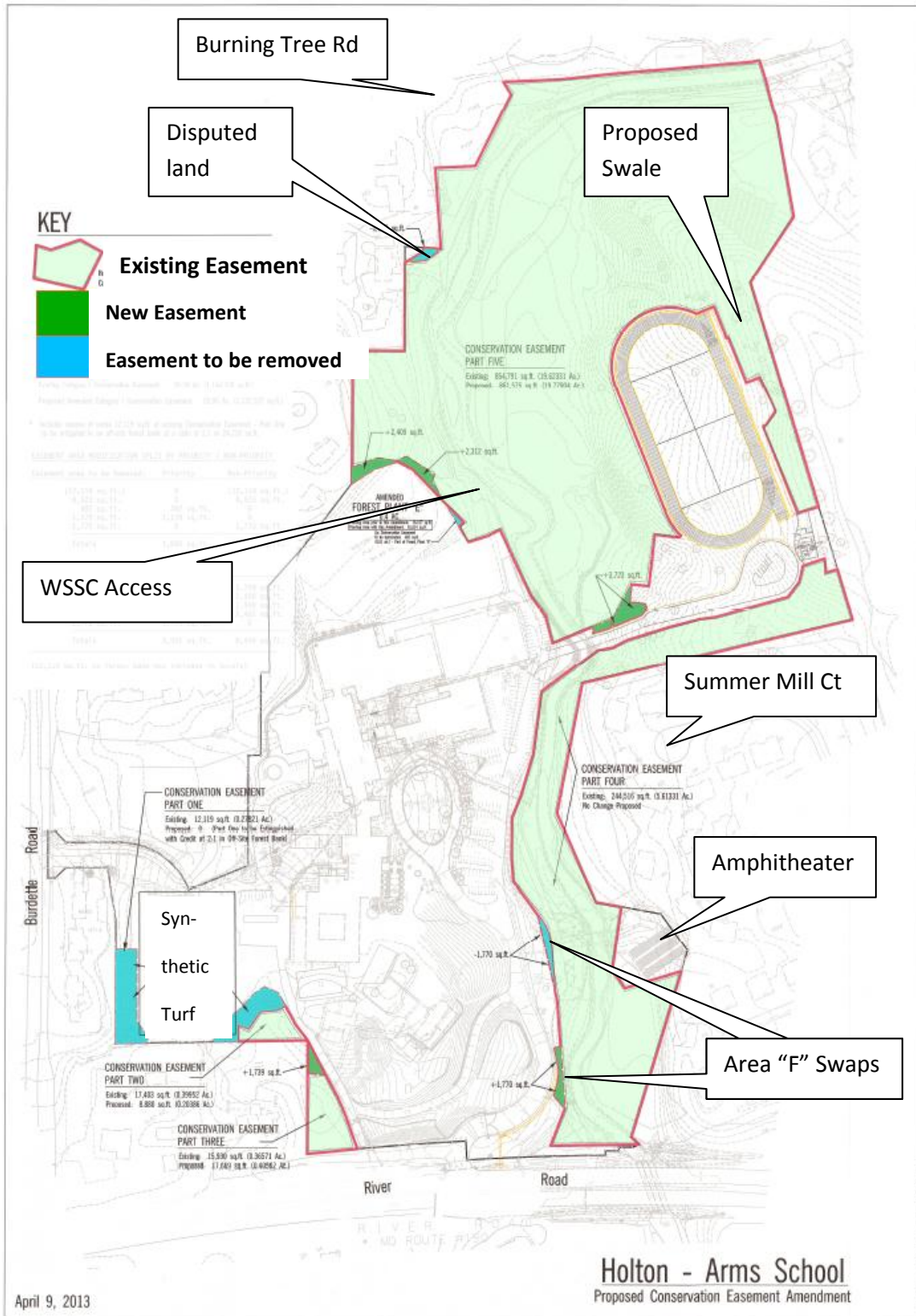
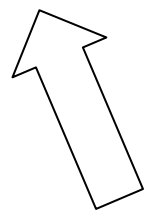


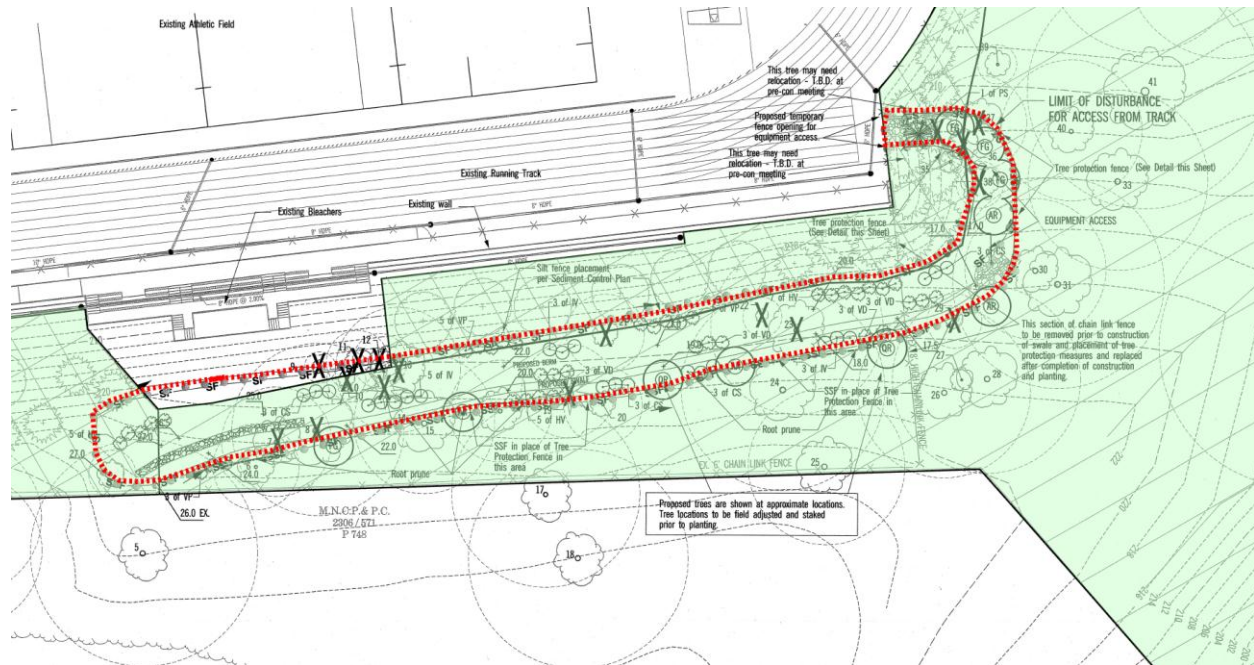
Image #2 Existing and proposed conservation easements

NORTH

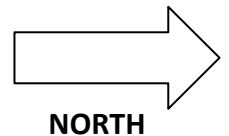


## CURRENT PROJECT DESCRIPTION

The applicant proposes a number of modifications to the existing plans and easement areas as described below:



**Image #3** Proposed plan for swale installation near track and bleachers



### 1. Proposed graded swale near bleachers:

The applicant is proposing approximately 10,000 sf of disturbance within the Category I Conservation Easement to install a drainage diversion swale as shown in Image #3 above. The area of disturbance is generally within the footprint of the previous LOD that was approved for site grading. The original disturbance of the area occurred approximately nine years ago for the track and field installation; therefore the currently proposed work does not have an adverse effect on trees of a substantial size. The area does contain numerous young native trees that have naturally regenerated among the reforestation plantings that had also been installed.

The area will remain in a Category I Conservation Easement and stabilized with top-soil and a bio-degradable erosion control matting. The area will also be restored with reforestation plantings. The drainage will be directed to an existing swale within the conservation easement area. The consultant has confirmed that no new erosion will result. The conveyed drainage will run through the valley below the ridge top where the sensitive plant populations were mapped.

2. Lower athletic field (synthetic turf area):

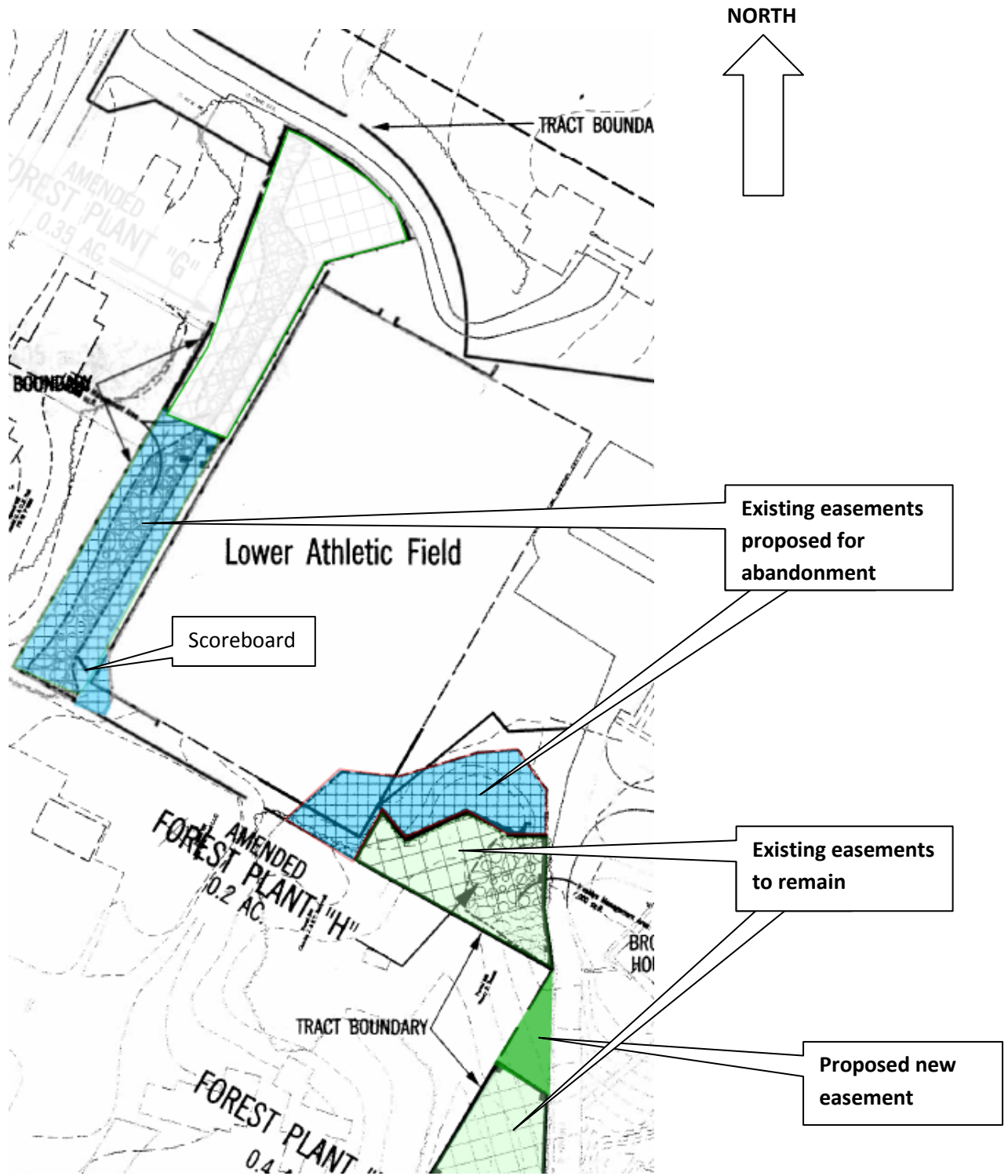


Image #4 Proposed easement abandonments near synthetic turf field

The current proposal is to abandon areas of easement that overlap with the new turf field and abandon additional areas beyond the December 20, 2006 approval (see page 16 for exhibit of approved plan). The additional abandonment is proposed to allow a scoreboard and its associated sight lines to remain. The remaining easement area near the scoreboard would be less than 50' wide and no longer meet forest definition. Furthermore the area is not associated with an environmental buffer, high priority forest or sensitive area. Therefore, the entire easement section is proposed for abandonment and offsite replacement mitigation at a 2:1 ratio<sup>2</sup>. No clearing or thinning of existing trees is actually proposed however the removal of invasive vines is proposed within the area.

The M-NCPPC forest conservation inspector had issued a citation on June 22, 2010 (Attachment C) for violation of the related easement area and the terms of the associated plan approval. The new field installation had occurred prior to the formal abandonment and recording of the easement areas, resulting in encroachments of recorded easements. Further encroachments were actually implemented beyond those allowed by the plan, resulting in additional conflicts (such as the scoreboard and associated sight lines). The citation items have been addressed by the applicant except for the formal abandonment/recording of the applicable easement areas. Staff agreed to defer the abandonment/recording so that the proposed easement changes could be comprehensively addressed by one plan and associated hearing.

The remaining easement boundaries near the southern end of the turf field will be protected from encroachments by a permanent spilt rail fence with appropriate signage. Supplemental tree and shrub plantings and the control of invasive species is also proposed for the same general area.

### **3. Proposed WSSC access:**

The previously approved FFCPs included overlapping WSSC easements within portions of the Category I Conservation Easements. Such overlap was standard practice at the time of approval but is occurring less frequently. Occasionally, WSSC personnel need to enter the property for inspection and maintenance of the underlying infrastructure. However, an approximate 200' section of the linear and narrow WSSC easement straddles portions of the stream channel and banks (refer to image # 2 for general location). Although WSSC would have the authority to traverse the environmentally sensitive terrain, doing so would be difficult and unnecessarily disruptive. The forest conservation inspector has worked with WSSC and school

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<sup>2</sup> 2:1 replacement is the standard ratio for offsite mitigation.



personnel in the past to coordinate WSSC access through an existing pathway within the conservation easement and outside sections of the WSSC easement.

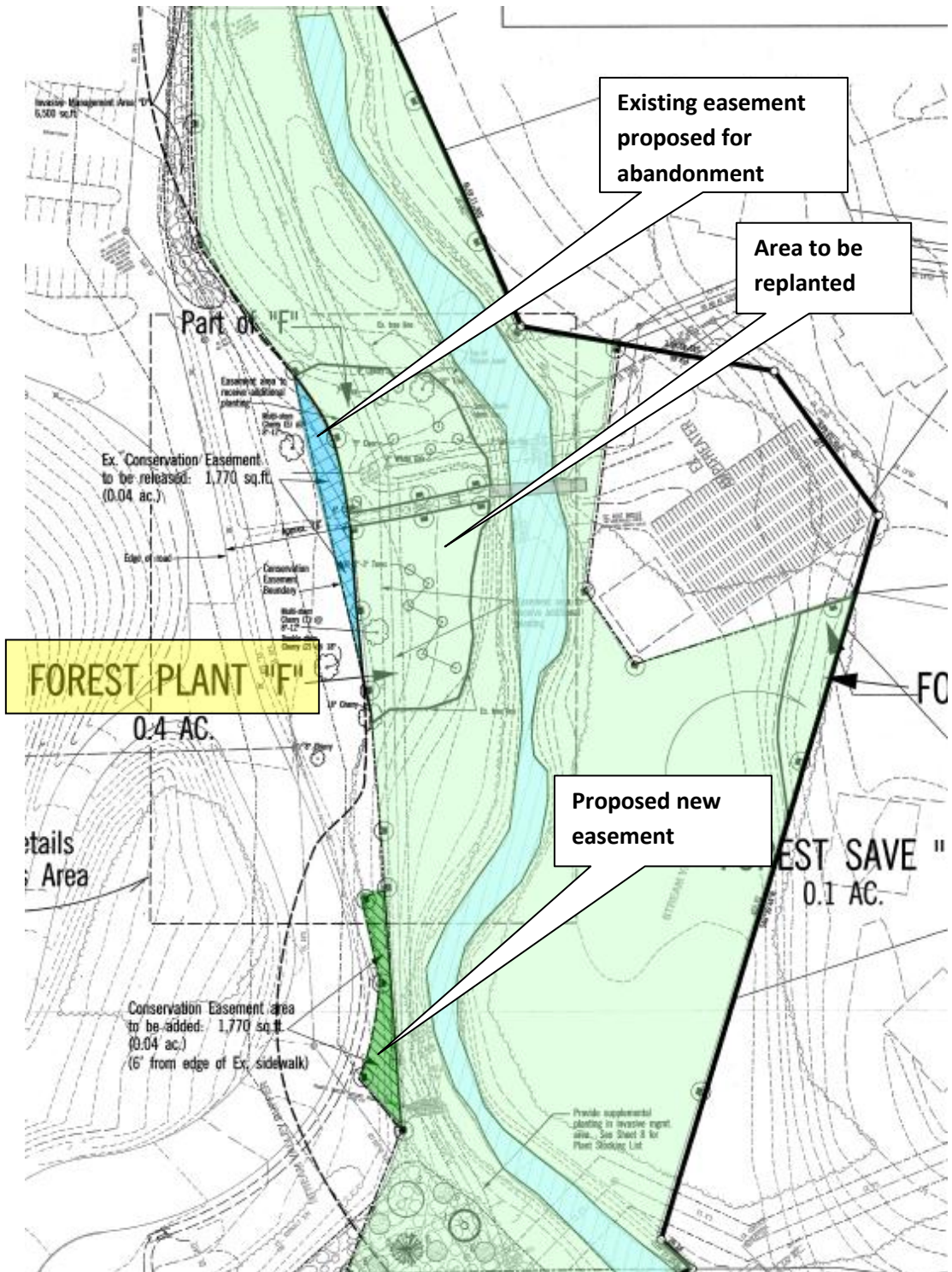
The current application proposes to formalize the bypass on the plans, within the existing conservation easement area to remain. The proposal includes a delineation of the path with split-rail fence and bollards. A provision will be included to provide a woodchip/mulch cover installation over the WSSC access, and if needed to prevent excessive rutting and root compaction.

Allowing the access to continue will further protect the more environmentally sensitive stream banks and channel located immediately adjacent to the access route, while allowing WSSC personnel to appropriately access and maintain their infrastructure.

#### **4. Amphitheater Access and Area "F":**

The plans propose the abandonment of 1,770 sf of conservation that is *outside* of the stream valley buffer (SVB) and part of area "F". The original forest conservation plans show the area to receive forest plantings. The area to now be abandoned will be replaced with an area of the same square footage that is located *within* the SVB. The proposed new easement area is located in close proximity to the stream as shown in Image #5 on the following page. Staff supports the proposed swap as it will result in a net improvement for the stream buffer. A condition is recommended for the applicant to further coordinate with Staff to provide any invasive control, supplemental plantings and/or removal of encroaching features that may be needed to appropriately restore the new easement area.

Furthermore the existing easement language includes a provision for maintenance of path/trail and bridges (within the conservation easement) leading to an amphitheater on the east side of the stream (refer to Images #2 and #5 for locations). The maintenance zone for the access is limited to the original LOD and does not allow for general maintenance of easement outside of the access areas. However, some areas of excessive mowing have occurred beyond the access corridor. The areas remaining in easement will now be restored with supplemental native plantings and delineated with mulch and signs.



**Image #5** Proposed easement swap near school entrance

**5. Removal of easement area near north central sports field:**

The applicant proposes the release of a portion of easement located in close proximity to a sport field. This area is used mainly for soccer and lacrosse and is needed to appropriately maintain the sports facility. The area is also within the stream buffer but does not contain existing forest. The amount proposed for removal is 0.01 acres (less than 500 sf) and will be replaced onsite by an easement area of higher priority that contains *existing* forest in the stream buffer.

**6. Easement encroachments by adjacent residents:**

Residents on nearby Burning Tree Road and Summer Mill Court have encroached on the school property and associated easement areas. The encroachments generally consist of various landscape features, lawn areas, and dumping of debris. Restoration measures to be performed by the applicant are shown on the plans and include the following items:

- i. Removal of all landscape fabrics/weed control matting
- ii. Removal of furnishings such as hammocks, tables, chairs, benches
- iii. Removal of ash/debris piles from the bases of trees
- iv. Removal of minor trash/manmade debris such plastic pots, bottles etc.
- v. Removal of general yard waste debris
- vi. Removal of the exposed electrical wires that are protruding from tree trunks (portions of the wires have become embedded in the trees)
- vii. Removal of electrical wires from forest floor (to the extent possible without damaging tree roots).
- viii. Removal of guy lines/wires from plantings
- ix. Demolition of retaining walls and restoration of original grade (minor portions of the wall and fill closest to neighboring property may remain).
- x. Mulching and native plantings to restore, delineate and protect area.
- xi. Installation of split-rail fence and conservation signage to delineate certain easement areas which have experienced ongoing encroachment issues from adjoining neighbors.

An additional area of note associated with encroachments is a portion of easement located adjacent to 8233 Burning Tree Rd. After the posting of the report for the previously scheduled February 14, 2013 hearing for this application, the resident who has been maintaining subject encroachments by mowing that portion of the easement had expressed concerns of the restoration that been recommended by Staff. Furthermore the adjacent resident has claimed ownership through adverse possession of the property in question and also believes that the easement was not valid as a result

of its claim (asserting prior interest to the easement area before the easement was recorded). The School is in dispute with the adjacent resident about the adverse possession claim, but is prepared to settle by transferring a portion of School property to the adjacent resident. Therefore, the school proposes to include that portion of its property - abandoning 1,178 sf of Category I easement. However, the continued claim by M-NCPPC of its easement over that property would hamper, if not prevent the Schools ability to settle with the adjacent resident, and M-NCPPC would be a required party to the threatened litigation between the resident and the School. Regardless of the threat of litigation, since the proposed mitigation for abandonment of the easement area includes the standard of 1:1 onsite replacement of Category I easement for easement within the environmental buffer (high priority forest to replace high priority forest), Staff supports the proposal.

#### **7. Areas of invasive plant control and restoration plantings:**

There are a number of areas where invasive species are enveloping some of the forest edges and stream channel areas within the conservation easement. The easement language generally provides for certain restrictions and provisions but does not require owners to actively maintain easement areas or remove invasive species once the maintenance and management period associated with forest conservation plantings has ended. However, as part of the mitigation for release of easement areas the applicant will provide for control of invasive species and reforestation of affected areas. The plans show six distinct areas where invasive species will be controlled.

#### **8. Supplemental Plantings**

There are a number of forest retention and reforestation areas approved on the previous plans which are sparsely vegetated due to a variety of factors (such as invasive species, encroachments and planting mortality). As part of the mitigation package, these areas will be replanted to meet appropriate reforestation/density standards. Approximately 120 trees and 72 shrubs will be planted.

### **Master Plan, Environment and Forest Conservation**

The Bethesda-Chevy Chase Master Plan makes specific land use and zoning recommendations for the subject property. On page 192 the Master Plan identifies the school site as a large land user and also shows the stream valley and associated forest as recommended conservation areas, which are further described on page 37 of the Plan.

Section 22A-12(b)(2)(F) of the forest conservation law prioritizes the retention of “areas designated as priority save areas in a master plan or functional plan” in addition to areas of contiguous forests, areas associated with floodplains, stream buffers, steep slopes and critical habitats among others. The proposed easement swaps will result in a greater footprint of higher priority areas protected within a Category I Easement than the currently approved plans provide.

No variance is required since no subject trees are impacted or removed by the plans. The grading near the track is the only area of proposed construction activity and does not affect subject trees. The remaining work proposed by the plans is generally limited to the control of invasive species, plantings of supplemental native species, and the installation of fence and signs. The work will be coordinated with the forest conservation inspector and performed in a manner minimizing disturbance and impact to environmentally sensitive areas.

## **Conclusion**

**Staff recommends approval of the application with conditions.** Implementation of the proposal will address the existing violations associated with the property. Staff supports the easement abandonments because the areas to be abandoned are either associated with relatively small isolated forest area *or* the areas are being replaced onsite with areas of equal or greater size and quality. The net easement footprint will increase the size of protected area identified within the Master Plans and prioritized by the forest conservation regulation and environmental guidelines. Additionally the applicant proposes a number of enhancements that will improve the quality of the existing forest.

## **APPENDIX: Outline of Project History**

### **Attachments:**

Attachment A – Proposed Plan

Attachment B – July 23, 2009 Staff Memo regarding proposed swale

Attachment C – June 22, 2010 Citation

## APPENDIX: OUTLINE OF PROJECT HISTORY:

- **Preliminary Plan 119871710** hearing on December 3, 1987 (opinion mailed December 15, 1987)
  - Re-subdivision so that all of the schools facilities are contained within one recorded property.
  - Plan identified school expansion areas and new track and field.
  - 50' wide conservation easement on either side of stream (among other items). Which was recorded on plat
  - Reforestation and stream maintenance agreement.
- **Plat # 573-92/17150** recorded on October 14, 1988
- **NRI/FSD 419991320** approved on February 5, 2001
  - Mapped 21.0 acres of onsite forest.
  - Identified a State threatened plant population of narrow melic-grass (*Melica mutica*) and three state watch-list species, showy skullcap (*Scutellaria serrata*), shining bedstraw (*Galium concinnum*) and shingle oak (*Quercus imbricaria*).
- **FFCP for CBA 1174C approved** on December 20, 2002 (and partially revised on February 22, 2002) for updated plans of school expansion.
  - Forest conservation requirements met by an expanded conservation easement area (Category I) which included a combination of forest retention, on site reforestation. Landscape plantings outside of the easement areas were also credited toward forest conservation.
  - Track and field location shifted further south than previously requested to avoid sensitive plant populations.
  - A stream restoration plan was proffered to further offset adverse impacts associated with the disturbance for the track and field (which was to be constructed entirely within a forested area).
  - The associated May 29, 2002 special exception condition of approval (condition 12) required that the school obtain approval of a stream restoration plan and implement the plan prior to release of permits for proposed work (associated with school expansion).
- **Stream restoration FFCP approved by staff on August 12, 2002**
- **Category I conservation easement recorded by deed** on December 19, 2003 (Liber 26189 folio 600). Recordation was made to reflect the easement areas approved on the December 20, 2002/February 22, 2002 FFCP
- The track and field and other modifications were installed *without* prior implementation of the stream restoration plan occurring:
  - Notice of Violation regarding special exception was issued on November 8, 2005.
  - Applicant coordinated with DPS inspection staff regarding violation and proceeded to obtain pre-requisite approvals/permits to implement stream work.
  - Stream restoration work begins in the fall of 2006.
- **FFCP Amendment Synthetic Turf Field** administratively approved on December 20, 2006 for easement swaps at the southwest tip of the campus (among the areas identified in the plan exhibit in Image #6 further below) to accommodate a new/reconfigured synthetic turf field and encroaching playset:

- Plans resulted in a net increase of easement area (0.02 acres or approximately 871 sf).
- However, the turf field installation proceeded without notification to M-NCPPC staff (in violation of forest conservation regulations).
- The work also occurred prior to the formal abandonment and recording of the easement areas, resulting in encroachments of recorded easements.
- Further encroachments/disturbance was actually implemented beyond those allowed by the plan, resulting in additional conflicts (such as a scoreboard and associated sight lines).
- Administrative Citation issued by M-NCPPC forest conservation inspector on June 22, 2010 for failure to comply with December 20, 2006 FFCP.
- \$500.00 citation paid June 30, 2010.
- Citation issues resolved except for abandonment/recordation of easement areas.

(Project History is continued on following pages)

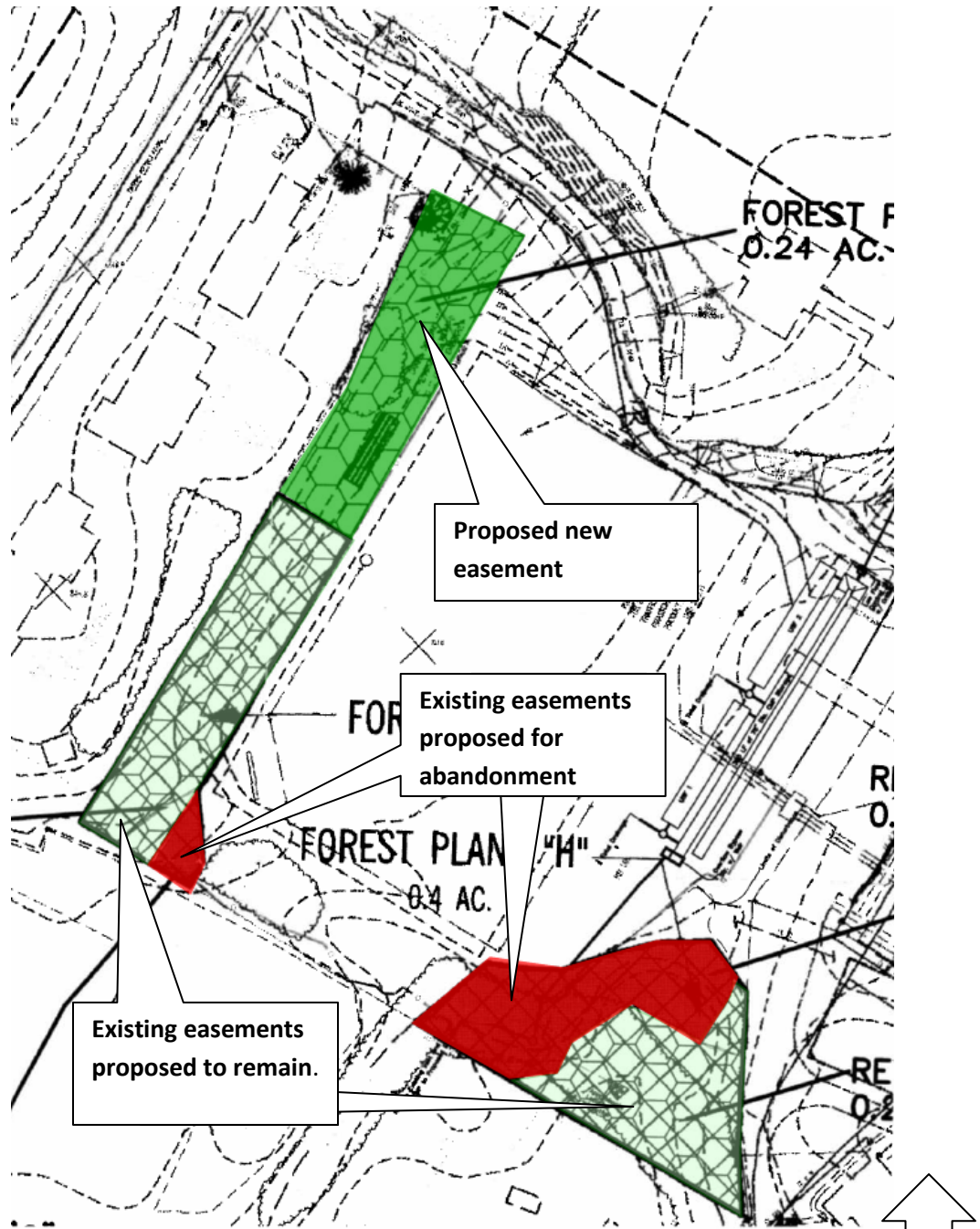


Image #6 December 20, 2006 Approved FFCP Amendment.



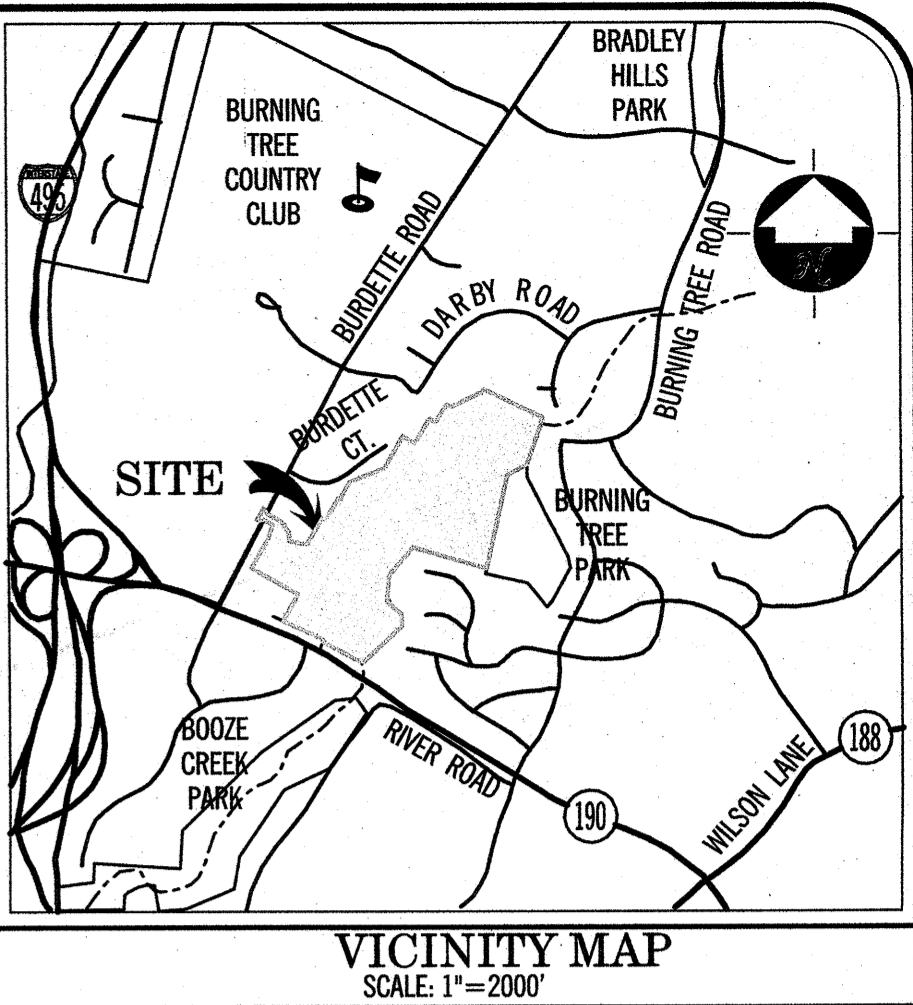
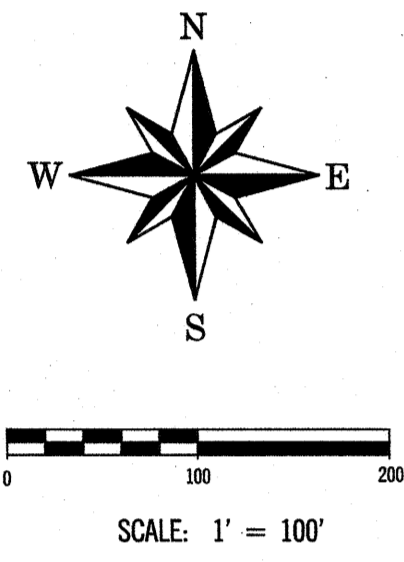
- **Concurrent erosion issue at track/bleachers** (within Category I Conservation Easement, near eastern center of boundary; **Image #3**).
  - Erosion associated with runoff from adjacent Park
  - Sediment deposits along school track
  - School staff in periodic contact with M-NCPPC Planning Department Staff regarding issue since 2005.
  - A pre-submission meeting for plans to address the erosion issue with a graded swale was memorialized in a July 23, 2009 memo from Staff.
  - Required formal FFCP amendment and Planning Board hearing.
  
- **4/23/2012 comprehensive application received** for current FFCP amendment to address the bleacher erosion area and the encroachments associated with turf field scoreboard (along with other modifications described further herein).

*The following application numbers are also associated with the Holton-Arms School:*

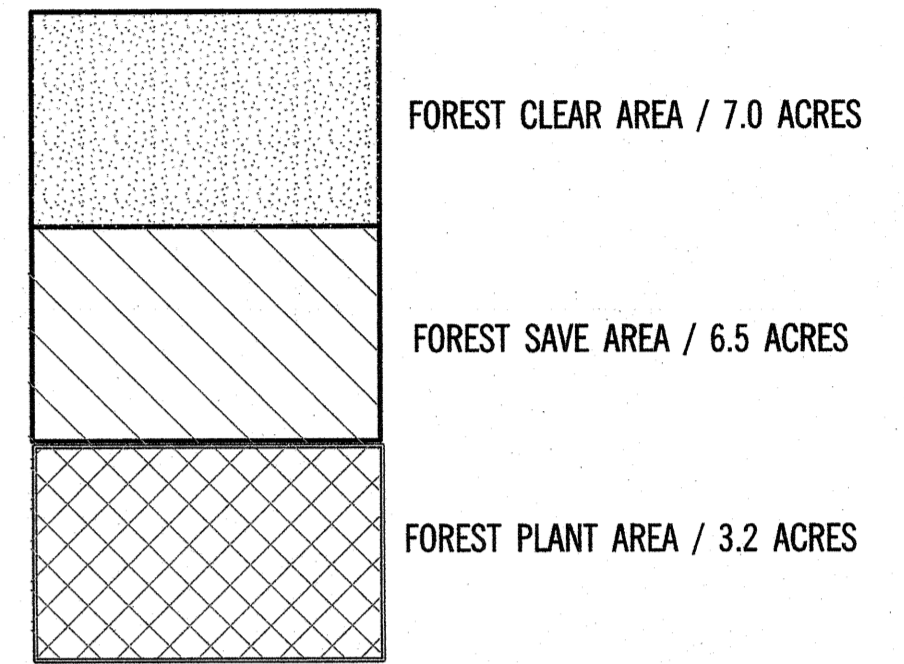
- **420063440**
- **S2467A**
- **S2503** *Petition to operate a co-educational summer camp for up to 645 children.*
- **S2503A**
- **CBA1174A**
- **CBA1174B**
- **CBA1174D** *Modification to a special exception for the operation of a private educational institution (increase enrolment from 650 to 665, among other changes).*

**FOREST CONSERVATION DATA TABLE** (ADDED AS PART OF 2012 FCP AMENDMENT)

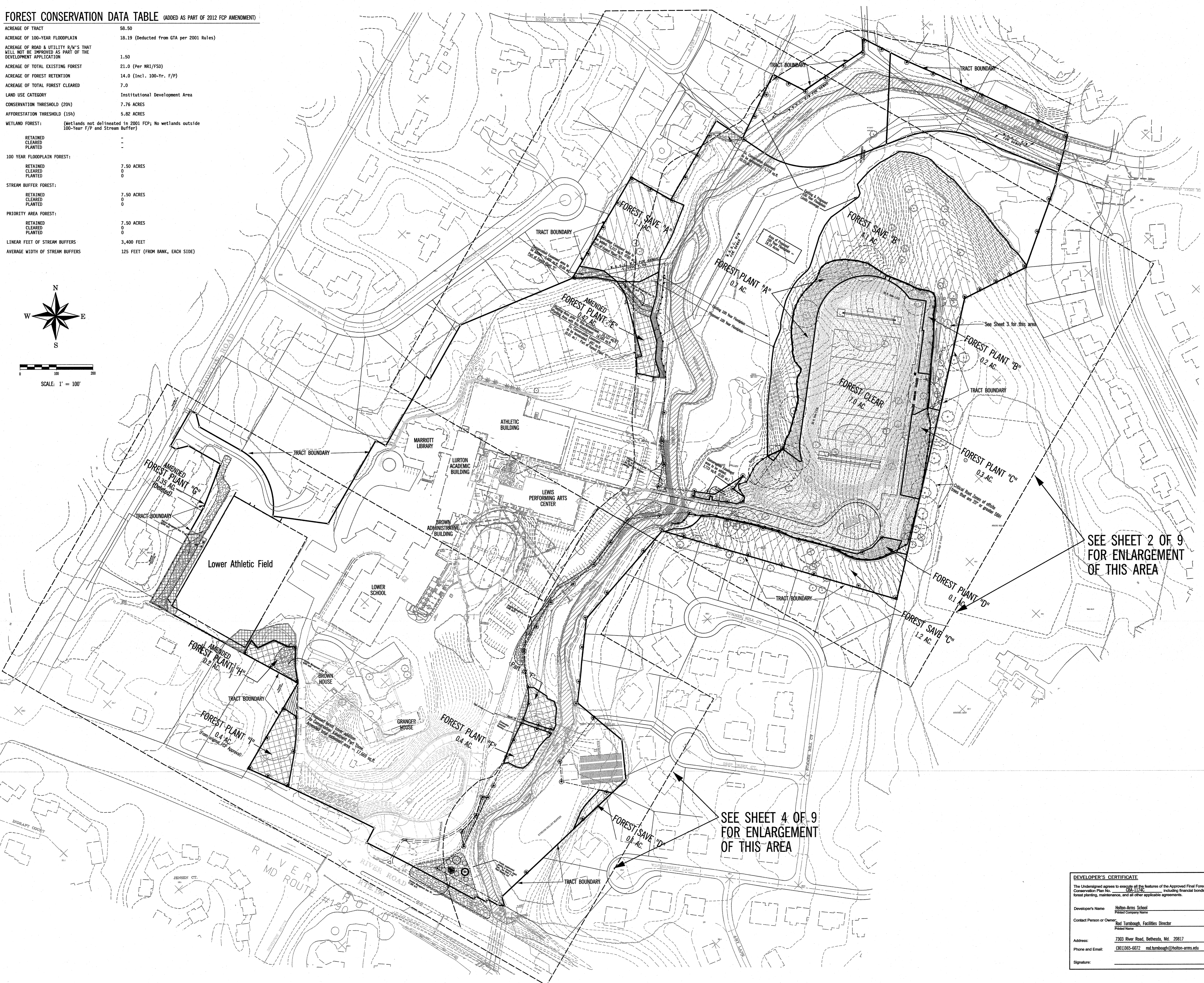
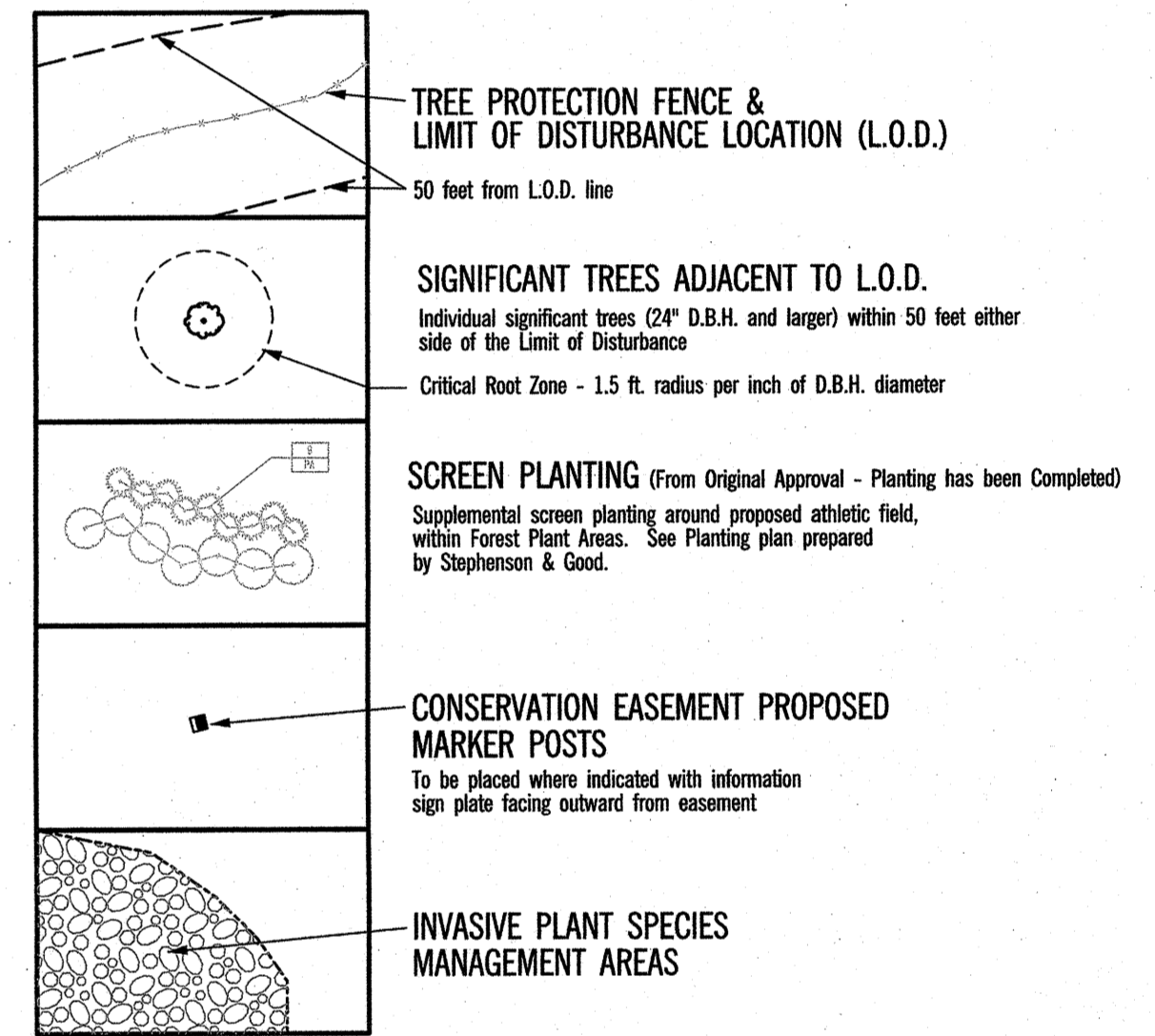
ACREAGE OF TRACT	58.50
ACREAGE OF 100-YEAR FLOODPLAIN	18.19 (Deducted from GTA per 2001 Rules)
ACREAGE OF ROAD & UTILITY R/W'S THAT WILL NOT BE IMPROVED AS PART OF THE DEVELOPMENT APPLICATION	1.50
ACREAGE OF TOTAL EXISTING FOREST	21.0 (Per NR1/FSD)
ACREAGE OF FOREST RETENTION	14.0 (Incl. 100-yr. F/P)
ACREAGE OF TOTAL FOREST CLEARED	7.0
LAND USE CATEGORY	Institutional Development Area
CONSERVATION THRESHOLD (20%)	7.76 ACRES
AFFORESTATION THRESHOLD (15%)	5.82 ACRES
WETLAND FOREST:	(Wetlands not delineated in 2001 FCP; No wetlands outside 100-year F/P and Stream Buffer)
RETAINED CLEARED PLANTED	-
100 YEAR FLOODPLAIN FOREST:	
RETAINED CLEARED PLANTED	7.50 ACRES 0 0
STREAM BUFFER FOREST:	
RETAINED CLEARED PLANTED	7.50 ACRES 0 0
PRIORITY AREA FOREST:	
RETAINED CLEARED PLANTED	7.50 ACRES 0 0
LINEAR FEET OF STREAM BUFFERS	3,400 FEET
AVERAGE WIDTH OF STREAM BUFFERS	125 FEET (FROM BANK, EACH SIDE)



**LEGEND**



TOTAL EXISTING FOREST AREA = 13.5 ACRES (Outside 100 Year Floodplain)



SEE SHEET 2 OF 9 FOR ENLARGEMENT OF THIS AREA

SEE SHEET 4 OF 9 FOR ENLARGEMENT OF THIS AREA

18-Jan-02  
FOREST CONSERVATION WORKSHEET  
VERSION 1.0

NET TRACT AREA:					
A. Total tract area.....	58.50				
B. Area within 100-year floodplain.....	18.19**				
C. Area within MSC R/W or road R/W constructed by public funds.....	1.50				
D. Net tract area.....	38.81				
*LAND USE CATEGORY: (from Table 2, page 42, "Trees" Manual)					
**Input the number "1" under the appropriate land use "zoning, and limit to only one entry."					
ABA	MDR	IDA	MDR	MPD	CIA
0	0	1	0	0	0
E. Afforestation Threshold.....		15%	x D = 5.82		
F. Conservation Threshold.....		20%	x D = 7.76		
EXISTING FOREST COVER:					
G. Existing forest cover (excluding floodplain).....	13.50				
H. Area of forest above afforestation threshold.....	7.68				
I. Area of forest above conservation threshold.....	5.74				
BREAK EVEN POINT:					
J. Forest retention above threshold with no mitigation.....	8.91				
K. Clearing permitted without mitigation.....	4.59				
PROPOSED FOREST CLEARING:					
L. Total area of forest to be cleared.....	7.00				
M. Total area of forest to be retained.....	6.50				
PLANTING REQUIREMENTS:					
N. Reforestation for clearing above conservation threshold.....	1.43				
P. Reforestation for clearing below conservation threshold.....	2.52				
Q. Credit for retention above conservation threshold.....	0.00				
R. Total reforestation required.....	3.96				
S. Total afforestation required.....	0.00				
T. Total reforestation and afforestation required.....	3.96				

**DEVELOPER'S CERTIFICATE**  
The Undersigned agrees to comply with all the features of the Approved Final Forest Conservation Plan No. 2012-1174C, including financial bonding, forest planting, maintenance, and all other applicable agreements.

Developer's Name: **Holton-Arms School**  
Planned Contingency Name:  
Contact Person or Owner: **Rod Turnbough, Facilities Director**  
Planned Name:  
Address: **7303 River Road, Bethesda, Md. 20817**  
Phone and Email: **(301)365-6072 rod.turnbough@holton-arms.edu**  
Signature: \_\_\_\_\_

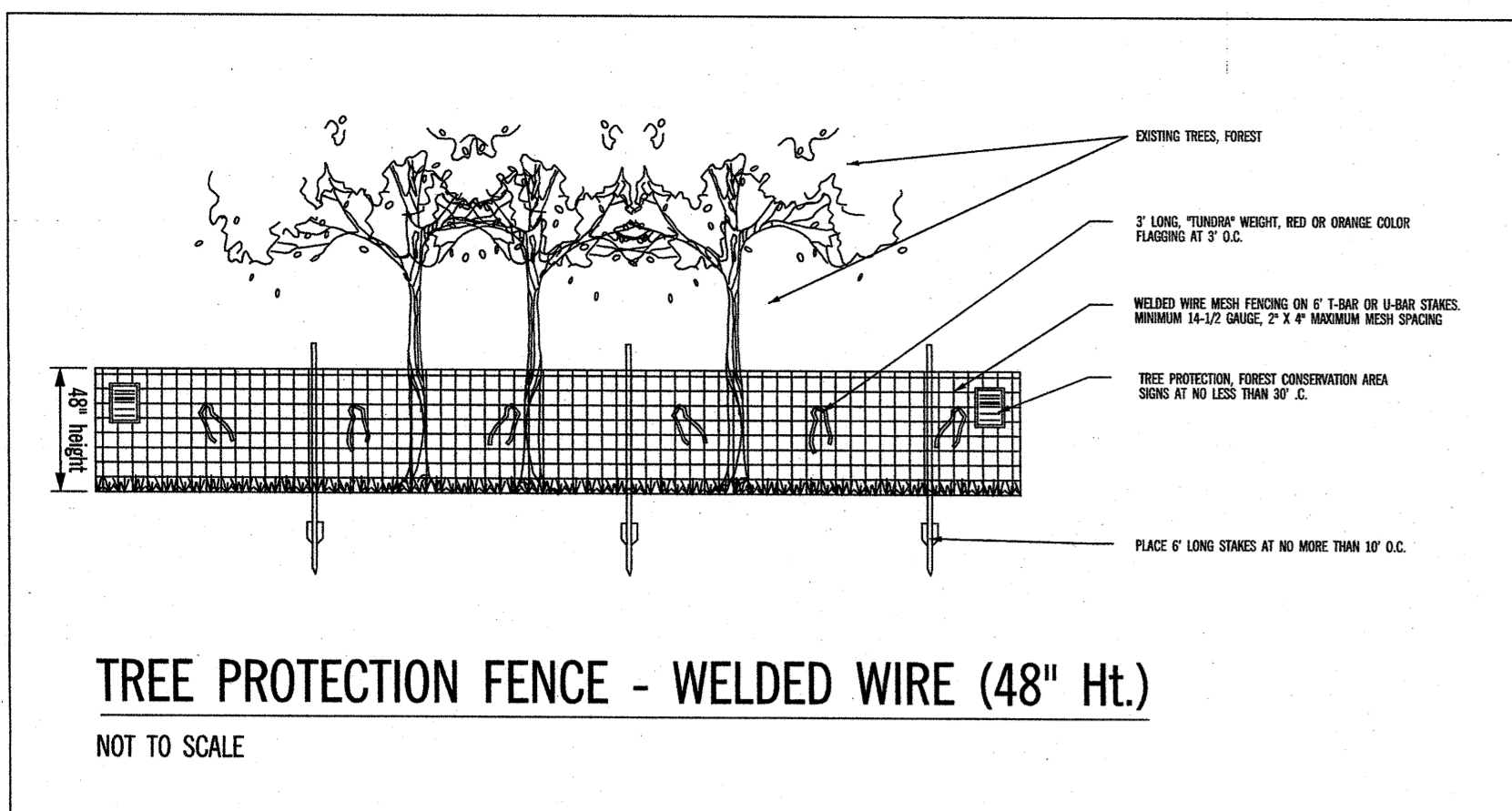
- Planting to be Provided: Revised April, 2013
- Credit for on-site Landscaped Areas: 0.79 Acres (20% of total planting requirement) - See Planting Plan prepared by Stephenson & Good for location of Landscaped Areas.
  - On-Site Reforestation: 3.17 Acres (2.72 Acres with 2013 Amendment - Forest Plant "H" eliminated).
  - Total On-Site planting to be provided: 3.51 Acres
  - Proposed Off-Site Forest Credits: 24,238 sq. ft. in a forest bank (Lorax Farm Bank is proposed). Extinguishment of Conservation Easement Part One Forest Plant "G" that is 32,119 sq. ft. in area is proposed to be mitigated at 2:1 (24,238 sq. ft.) in the off-site bank.

NO	REVISION	DATE
3	Revise per coordination with M-NCPCC Staff	4/9/13
2	Revise per 5/24/12 M-NCPCC Staff comments	10/18/12
1	Revise per 6/14/12 M-NCPCC Staff comments	7/10/12

OWNER:  
**HOLTON-ARMS SCHOOL**  
7303 RIVER ROAD  
BETHESDA, MARYLAND 20817-4697  
301-365-5300  
ATTN: ROD TURNBOUGH

**FINAL FOREST CONSERVATION PLAN**  
**HOLTON-ARMS SCHOOL**  
PARCEL 2, BURNING TREE VALLEY PLAT No. 17150  
BETHESDA (7th) ELECTION DISTRICT MONTGOMERY COUNTY, MARYLAND

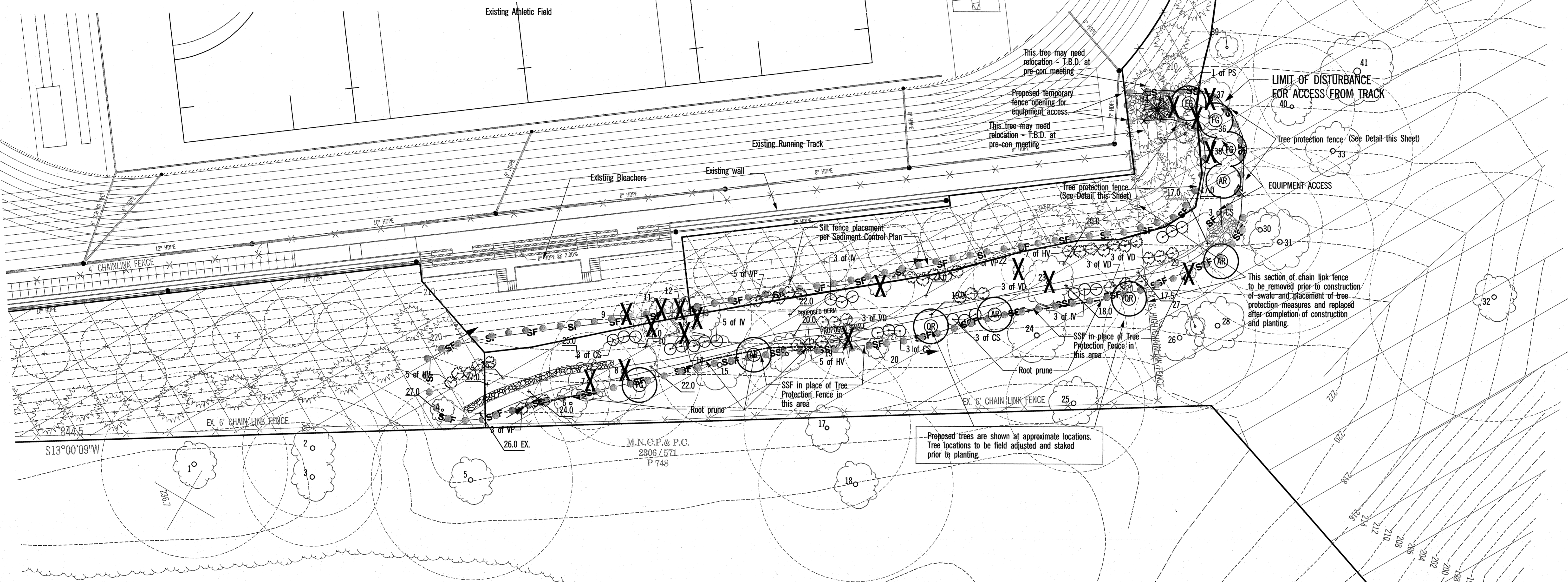
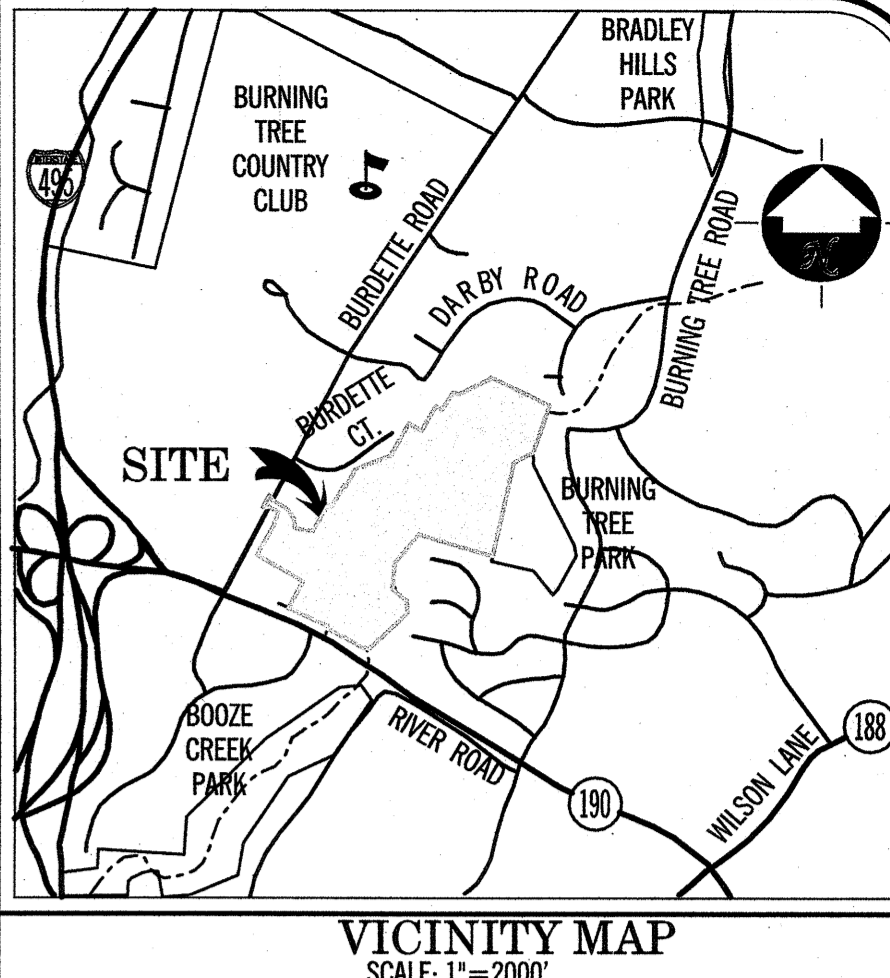
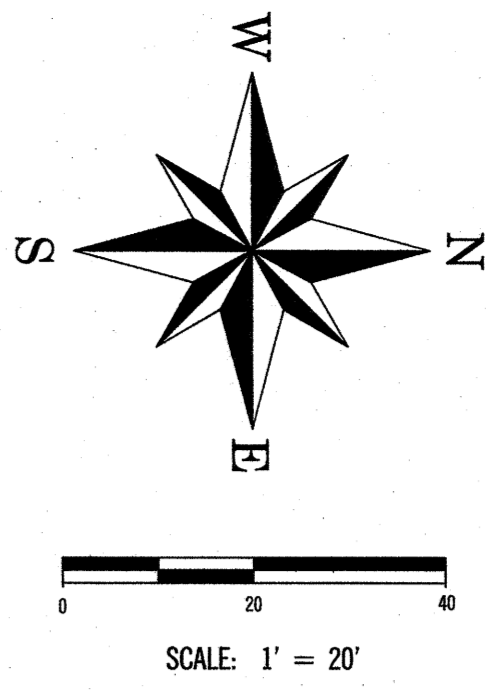




**TOPSOIL SPECIFICATION PER APPROVED SEDIMENT CONTROL PLAN**

Soil mix for surface dressing of the proposed drainage swale shall be as follows:

The soil shall consist of 1/3 compost and 2/3 topsoil. The compost shall be high grade compost, free of stones and partially composted woody material. The soil shall meet the following minimum criteria: contain no more than 10% clay, 30 - 55% silt and 35 - 60% sand. The soil shall be free of stones, stumps, roots or other similar objects larger than 2 inches. The first layer of the planting media shall be lightly filled to mix it into the sand layer, so as not to create a definitive boundary. The planting material shall be flooded after placement. Any settlement that occurs shall be filled to the design elevation. The bottom width shall be a minimum of 4 feet.



**LEGEND**

- Proposed Limit of Disturbance
- Existing Trees in Vicinity of Construction & Identification Number (See Action List)
- Proposed Silt Fence & Super Silt Fence Placement per Sediment Control Plan
- Proposed Tree Protection Fence Placement
- Proposed Root Pruning Trenches
- Proposed Trees & Key Number (See Plant List)
- Proposed Native Shrubs (See Plant List)
- Individual Tree Critical Root Zone (C.R.Z.)
- Trees to be Removed
- Forest Planting from 2002 FCP

**Tree & Shrub Planting - This Sheet Only**

16 trees plus 1 dead tree are to be removed for the swale construction. 6 removed trees are 12" DBH or larger (None are Significant Trees). 10 removed trees are less than 12" DBH. The 6 trees 12" and larger are to be replaced at 1:1 per the Plant List, below.

Six trees are to be removed for the construction access near the track. These five trees (1 White Pine, 3 American Beech & 1 Red Maple) will be replaced in kind and the replacement trees are included on the plant list below.

**ACTION LIST - TREES IN VICINITY OF PROPOSED SWALE**

TREE #	COPPIN NAME	DBH	CRZ AREA	CRZ DISTURBED	CRZ % SAVED	SAVE / REMOVE	COMMENTS
1 *	Tulip Poplar	27"	5,150 s.f.	0	100	Save	
2	Tulip Poplar	20"	2,830 s.f.	0	100	Save	
3	Tulip Poplar	20"	2,830 s.f.	0	100	Save	
4	American Beech	6"	250 s.f.	50 s.f.	80	Save	
5 *	Tulip Poplar	20"	5,940 s.f.	300 s.f.	95	Save	
6	Tulip Poplar	11"	560 s.f.	80 s.f.	91	Save	
7	Tulip Poplar	14"	1,390 s.f.	510 s.f.	63	Remove	At L.O.D.
8	Tulip Poplar	22"	3,420 s.f.	1,520 s.f.	56	Remove	At L.O.D.
9	American Beech	4"	110 s.f.	110 s.f.	0	Remove	In graded area
10	American Beech	5"	180 s.f.	180 s.f.	0	Remove	In graded area
11	Tulip Poplar	8"	450 s.f.	450 s.f.	0	Remove	In graded area
12	American Beech	7"	350 s.f.	350 s.f.	0	Remove	In graded area
13	Tulip Poplar	16"	1,810 s.f.	1,810 s.f.	0	Remove	In graded area
14	White Pine	10"	100 s.f.	100 s.f.	0	Remove	Dead tree
15	Tulip Poplar	18"	2,290 s.f.	740 s.f.	67	Save	
16	Tulip Poplar	13"	1,190 s.f.	320 s.f.	73	Save	
17 *	Tulip Poplar	24"	4,070 s.f.	0	100	Save	
18 *	Tulip Poplar	28"	5,540 s.f.	0	100	Save	
19	White Pine	12"	1,020 s.f.	400 s.f.	61	Remove	Poor condition
20	American Beech	10"	710 s.f.	710 s.f.	0	Remove	In graded area
21	Tulip Poplar	10"	710 s.f.	710 s.f.	0	Remove	In graded area
22	Tulip Poplar	5"	180 s.f.	180 s.f.	0	Remove	In graded area
23	Tulip Poplar	22"	3,420 s.f.	3,420 s.f.	0	Remove	In graded area
24 *	Tulip Poplar	26"	4,780 s.f.	4,780 s.f.	0	Save	
25	Tulip Poplar	20"	2,830 s.f.	0	100	Save	
26	Oak	22"	3,420 s.f.	140 s.f.	96	Save	
27	American Beech	9"	570 s.f.	0	100	Save	
28 *	Oak	24"	4,070 s.f.	240 s.f.	94	Save	
29	American Beech	7"	350 s.f.	350 s.f.	0	Remove	In graded area
30	Tulip Poplar	18"	2,290 s.f.	490 s.f.	79	Save	At L.O.D.
31 *	Tulip Poplar	27"	5,150 s.f.	730 s.f.	86	Save	
32 **	Oak	22"	3,420 s.f.	9,160 s.f.	66	Remove	
33	Tulip Poplar	23"	3,740 s.f.	0	100	Save	
34	White Pine	3"	60 s.f.	60 s.f.	0	Remove	In graded area
35	American Beech	3"	60 s.f.	60 s.f.	0	Remove	In graded area
36	American Beech	4"	110 s.f.	110 s.f.	0	Remove	In graded area
37	Red Maple	12"	1,020 s.f.	1,020 s.f.	0	Remove	In graded area
38	American Beech	7"	350 s.f.	230 s.f.	0	Remove	In graded area
39	American Beech	5"	180 s.f.	0	100	Save	
40	Tulip Poplar	18"	2,290 s.f.	0	100	Save	
41 **	Tulip Poplar	30"	6,360 s.f.	0	100	Save	
42 *	Oak	25"	4,420 s.f.	0	100	Save	
43 *	American Beech	26"	4,780 s.f.	0	100	Save	

KEY	BOTANICAL NAME	COMMON NAME	SIZE *	QUANTITY	COMMENTS
AR	Acer rubrum	Red Maple	2" - 2.5" cal. / 12' - 14' ht.	4	B & B, well formed crowns
FG	Fagus grandifolia	American Beech	2" - 2.5" cal. / 12' - 14' ht.	4	B & B, well formed crowns
PS	Pinus strobus	White Pine	7" - 8" ht. / 4' - 5' spd.	1	B & B, lightly sheared
QR	Quercus rubra	Red Oak (Northern)	2" - 2.5" cal. / 12' - 14' ht.	2	B & B, well formed crowns
CS	Cornus stolonifera	Red-Osier Dogwood	24" - 30" ht. & spd.	12	B & B or Container
HV	Hamamelis virginiana	Witch Hazel	24" - 30" ht. & spd.	17	B & B or Container
IV	Ilex verticillata	Winterberry Holly	24" - 30" ht. & spd.	11	B & B or Container
VD	Viburnum dentatum	Southern Arrowwood Viburnum	24" - 30" ht. & spd.	12	B & B or Container
VP	Viburnum prunifolium	Blackhaw Viburnum	24" - 30" ht. & spd.	13	B & B or Container

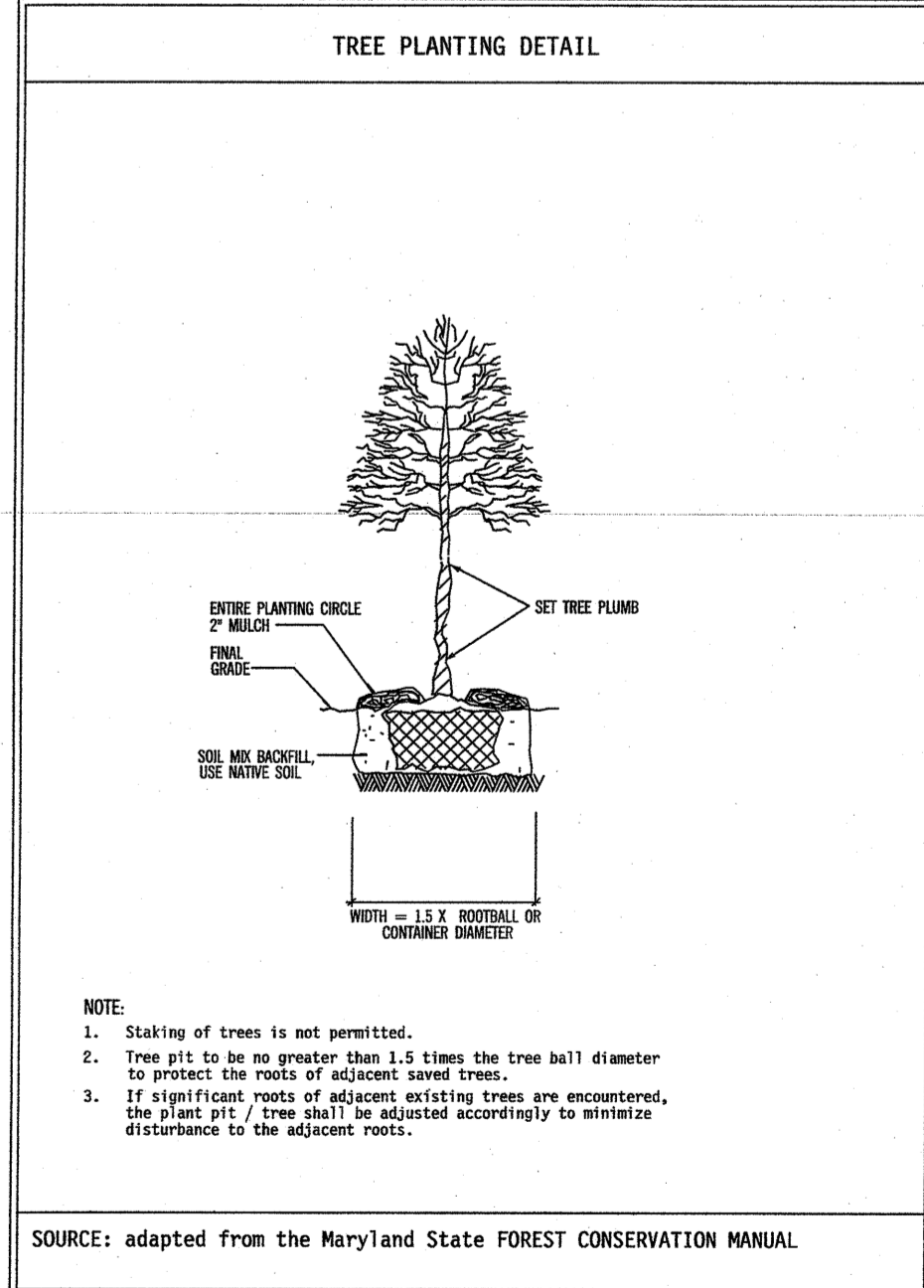
NOTE: All plant material specified on this plant list shall conform to size, root condition, ball dimensions, spread / height, etc., as specified in "American Standard for Nursery Stock" (ANSI Z60.1), most recent edition, published by the American Nursery & Landscape Association, Washington, D.C.

NOTE: ALTERNATE PLANT SPECIES  
Alternate plant species may be approved at the discretion of the M-NCPPC inspector.

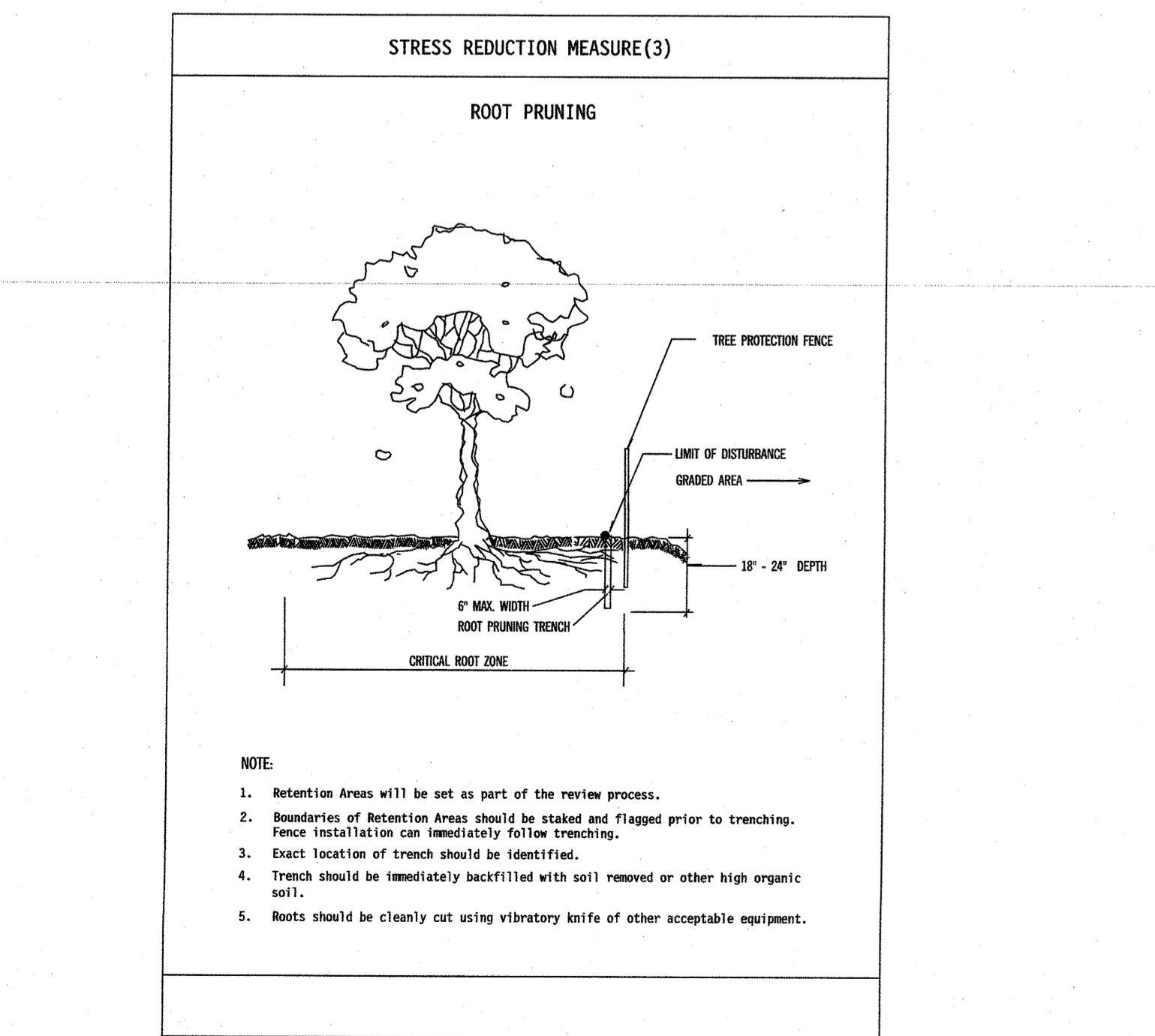
**DEVELOPER'S CERTIFICATE**

The undersigned agrees to execute all the features of the Approved Final Forest Conservation Plan No. 2008-11-05, including financial bonding, forest planting, maintenance, and all other applicable agreements.

Developer's Name: Holton-Arms School  
 Project Name: Holton-Arms School  
 Contact Person or Owner: Rod Turnbough, Facilities Director  
 Address: 7303 River Road, Bethesda, Md. 20817  
 Phone and Email: (301)245-6072 rod.turnbough@holton-arms.edu  
 Signature: \_\_\_\_\_



**DETAIL FOR 2012 AMENDMENT**



NO	REVISION	DATE
4	Revised per coordination with M-NCPPC Staff	4/9/13
3	Revised per 9/24/12 M-NCPPC Staff comments	10/18/12
2	Revised per 6/24/12 M-NCPPC Staff comments	7/10/12
1	This sheet added Feb., 2012	2/15/12

OWNER:  
**HOLTON-ARMS SCHOOL**  
 7303 RIVER ROAD  
 BETHESDA, MARYLAND 20817-4697  
 301-365-5300  
 ATTN: ROD TURNBOUGH

Swale Above Athletic Field Bleachers

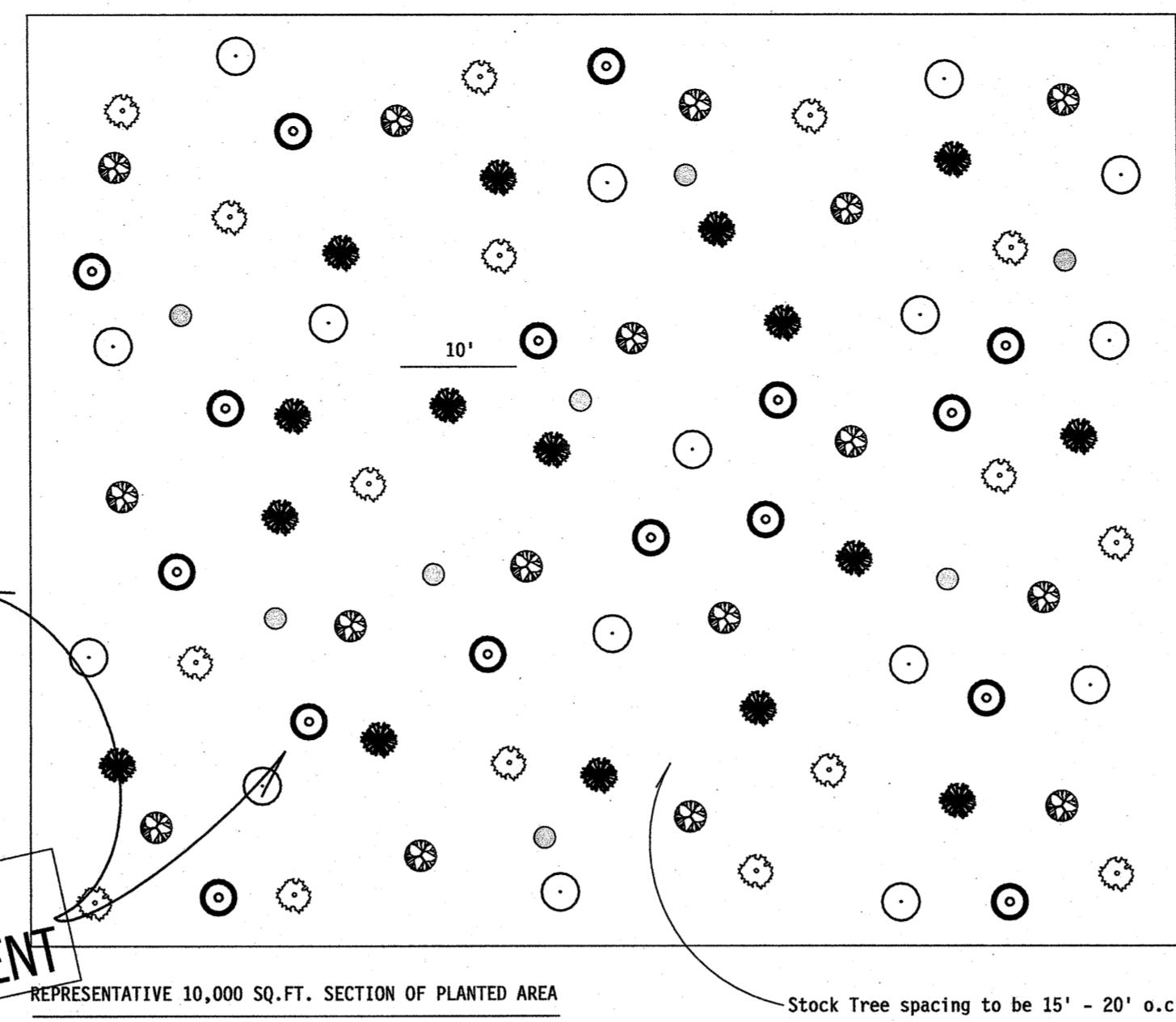
Forest Conservation Plan - Supplemental Swale Area  
**HOLTON-ARMS SCHOOL**  
 PARCEL 2, BURNING TREE VALLEY PLAT No. 17150  
 BETHESDA (7th) ELECTION DISTRICT MONTGOMERY COUNTY, MARYLAND

**PLANT STOCKING LIST - FOREST PLANT AREAS "E" thru "I"**

SYMBOL	BOTANICAL NAME	COMMON NAME	STOCK SIZE	QUANTITIES PER PLANTING AREA					TOTAL QUANTITY	REMARKS
				Area E	Area F	Area G	Area H	Area I		
TREES	Acer rubrum	Red Maple	3" - 4" ht. / min. 2 gal.	28	28	21	14	14	105	Container Grown
	Liriodendron tulipifera	Tulip Poplar	3" - 4" ht. / min. 2 gal.	28	28	21	14	14	105	Container Grown
	Nyssa sylvatica	Black Gum	3" - 4" ht. / min. 2 gal.	28	28	21	14	14	105	Container Grown
	Prunus serotina	Black Cherry	3" - 4" ht. / min. 2 gal.	28	28	21	14	14	105	Container Grown
	Quercus rubra	Northern Red Oak	3" - 4" ht. / min. 2 gal.	28	28	21	14	14	105	Container Grown
SHRUBS	Lindera borealis	Spicebush	18"-24" ht. / min. 1 gal.	16	16	12	8	8	60	Container Grown
	Vaccinium vacillans	Early Lowbush Blueberry	18"-24" ht. / min. 1 gal.	16	16	12	8	8	60	Container Grown
	Viburnum acerifolium	Mapleleaf Viburnum	18"-24" ht. / min. 1 gal.	15	15	11	7	7	55	Container Grown
TOTAL TREES				140	140	105	70	70	525	
TOTAL SHRUBS				47	47	35	23	23	175	

See "Typical Random Planting Pattern", this sheet

**TYPICAL RANDOM PLANTING PATTERN FOR FOREST PLANT AREAS E, F & G**



**THIS INFORMATION FROM 2002 APPROVAL & IS NOT APPLICABLE TO 2012 AMENDMENT**

**TABULATION OF PLANTING AREAS**

PLANTING AREA	AREA	NO. OF TREES REQUIRED*	NO. OF SHRUBS REQUIRED**
A	0.7 Acres	245	82
B	0.2 Acres	70	23
C	0.3 Acres	105	35
D	0.1 Acres	35	12
E	0.4 Acres	140	47
F	0.4 Acres	140	47
G	0.3 Acres	105	35
H	0.4 Acres	70 #	23 #
I	0.4 Acres	70 #	23 #
TOTALS	2.1 Acres	980	327

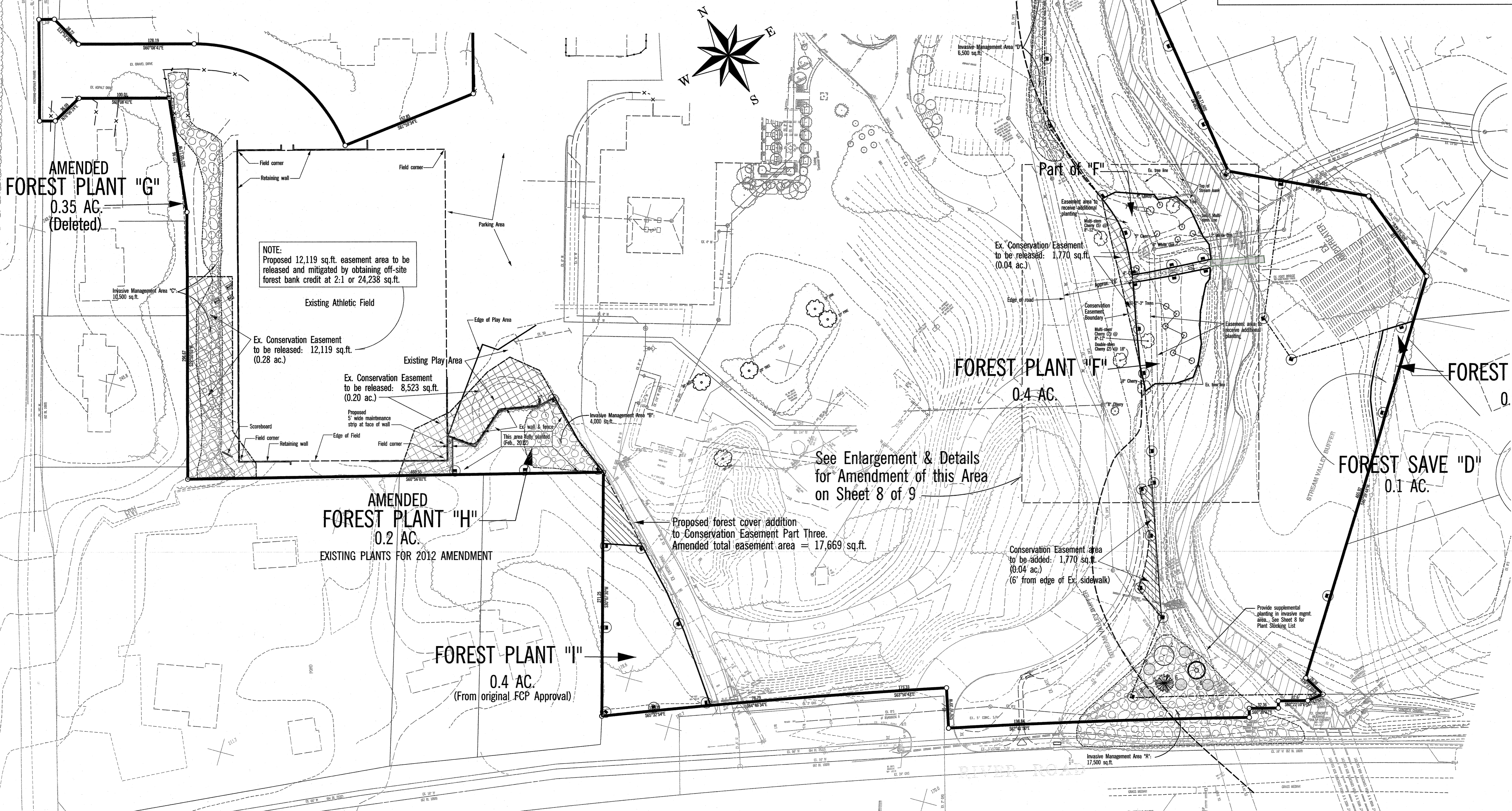
Base number of plants indicated on this chart - See Sheet 4 of 4 for crediting of proposed screen planting within Forest Plant Areas "A" thru "D". Actual number of forest stock plants to be less than the base quantity listed on this table.

\* Quantities based on planting of 3'-4" height hardwood whip / seedling stock at the rate of 350 trees per acre.  
 \*\* Shrubs to be planted at 1/3 the rate of trees.  
 # Area H: MODIFIED STOCKING RATE: Area is approximately 50% covered by dense brush and understory trees with the remaining 50% without any cover. Proposed planting only to be installed on the area without cover at the rate of 350 trees per acre, thus 50% of 0.4 acres = 0.2 acres or 70 trees / 23 shrubs.  
 # Area I: MODIFIED STOCKING RATE: Area is a steeply sloped area under marginal forest cover of 4-50 trees per acre. Understory / shrub layer is widely spaced with room for additional shrub planting. Proposed planting is at 50% of the 350 trees / acre rate spread over the entire forest plant area of 0.4 acres, thus 0.4 acres @ 50% of 350 trees / acre = 70 trees / 23 shrubs.

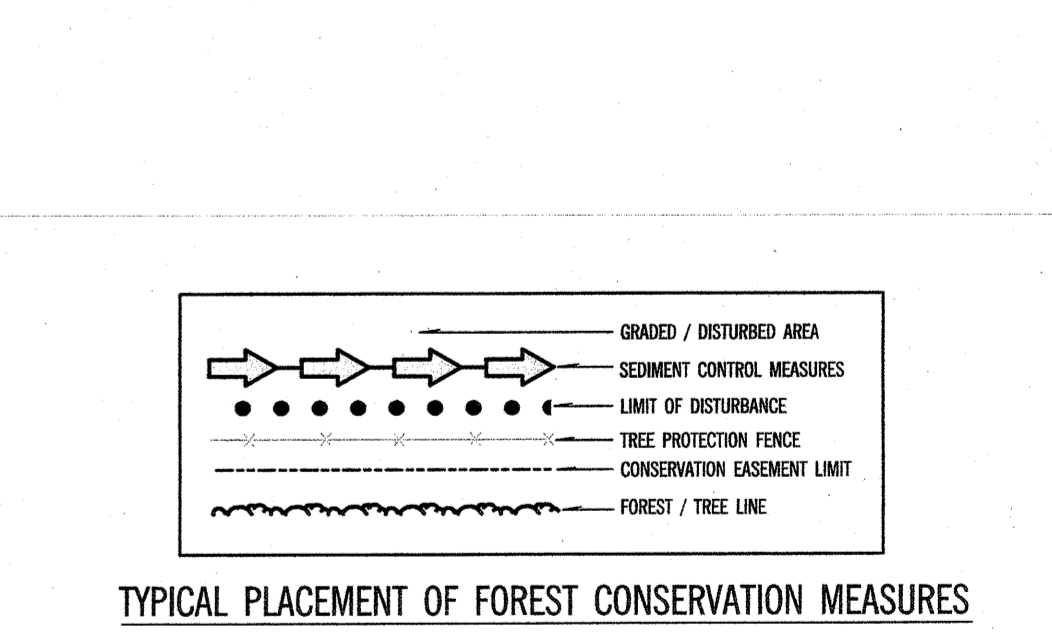
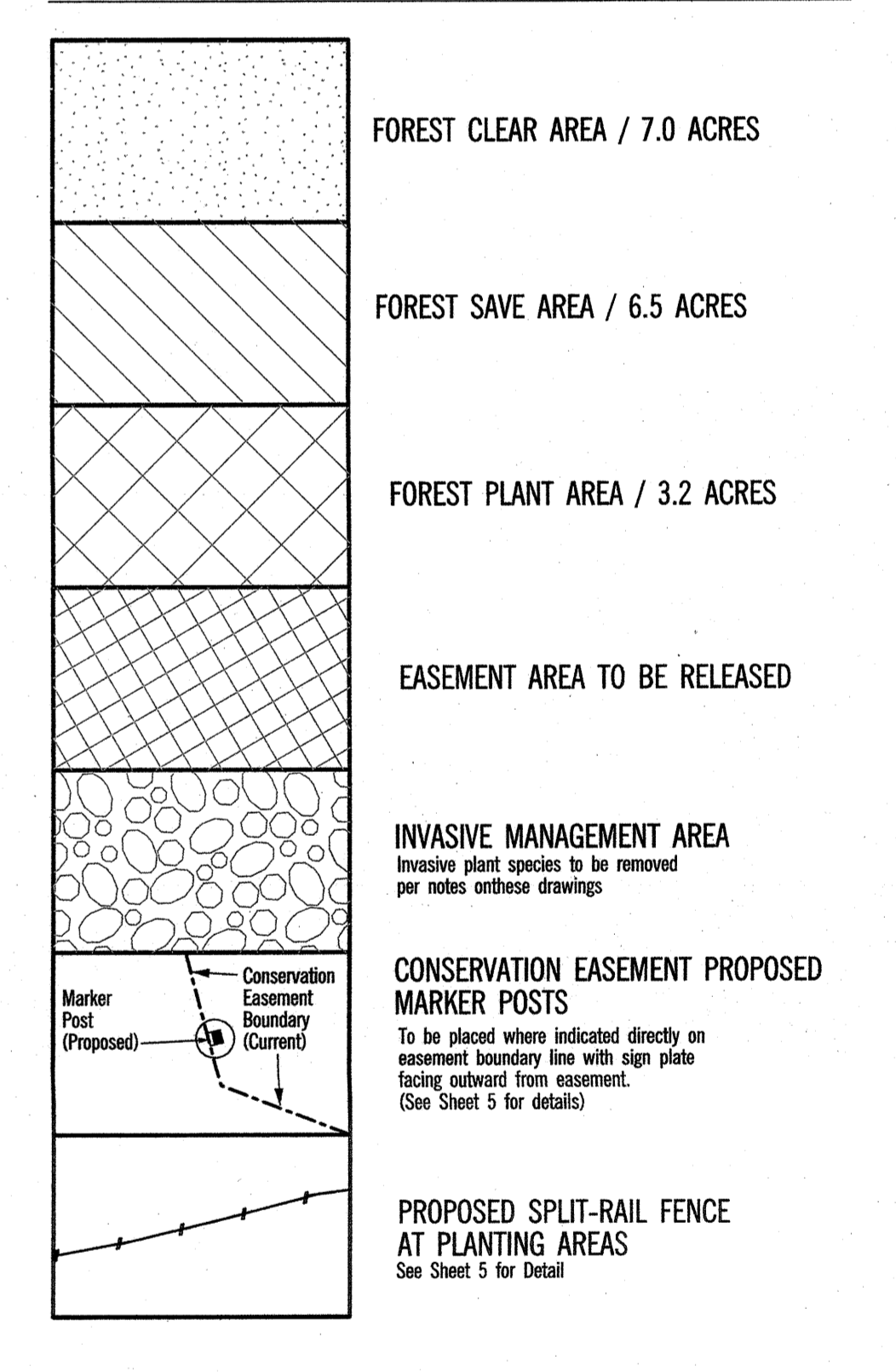
**SPECIES TO BE PLANTED AS ATHLETIC FIELD SCREENING WITHIN FOREST PLANT AREAS A, B, C, & D - See Planting Plan by Stephenson & Good - Sheet L3.05**

LETTER KEY*	BOTANICAL NAME	COMMON NAME	CANOPY CREDIT @ 100 TREES / ACRE	SIZE @ PLANTING
ARI	Acer rubrum 'Red Sunset'	Red Sunset Maple	435 sq.ft.	3" cal.
HV	Hamamelis vernalis	Vernal Witch Hazel	0 (shrub)	24" ht.
IO	Ilex opaca	American Holly	435 sq.ft.	6" ht.
PA	Picea abies	Norway Spruce	435 sq.ft.	6" ht.
QT	Quercus imbricaria	Shingle Oak	435 sq.ft.	2" cal.
QPR	Quercus prinus	Chestnut Oak	435 sq.ft.	2" cal.
QR	Quercus rubra	Red Oak	435 sq.ft.	2" cal.

**THIS INFORMATION FROM 2002 APPROVAL & IS NOT APPLICABLE TO 2012 AMENDMENT**



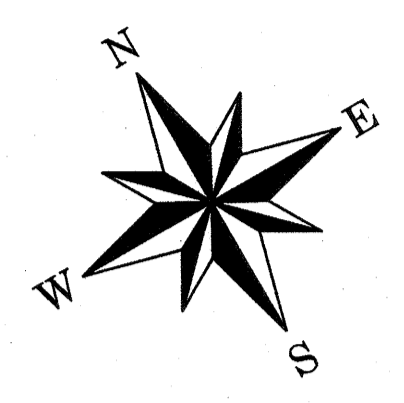
**LEGEND**



**DEVELOPER'S CERTIFICATE**  
 The Undersigned agrees to comply with the terms of the Approved Final Forest Conservation Plan No. 03011102, including financial bonding, forest planting, maintenance, and all other applicable agreements.  
 Developer's Name: Holton-Arms School  
 Contact Person or Owner: Rod Turnbough, Facilities Director  
 Address: 7303 River Road, Bethesda, Md. 20817  
 Phone and Email: (301)365-6072, rod.turnbough@holton-arms.edu  
 Signature: \_\_\_\_\_

NO	REVISION	DATE
4	Revise per coordination with M-NCPCC Staff	4/9/13
3	Revise per 5/24/12 M-NCPCC Staff comments	10/18/12
2	Revise per 6/14/12 M-NCPCC Staff comments	7/10/12
1	Revise edge of Forest Save "I" adjacent to amphitheater (remains 0.1 Ac.)	12/16/02





**LEGEND**

- Boundary of proposed Category I Conservation Easement
- Current Conservation Easement Boundary to be Modified
- Esmt. area to be added

NOTE: Potential Wetlands include the Wetlands and Waters of the United States identified by the Biohabitats 2001 Study, which is incorporated by reference and filed in Board of Appeals Case No. CBA-1174-C.

MATCHLINE SEE SHEET 7 of 9

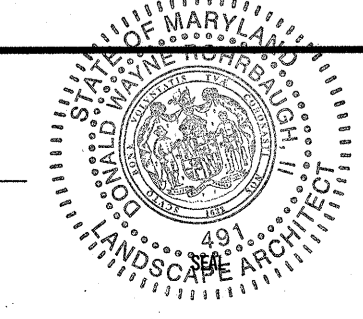
**DEVELOPER'S CERTIFICATE**

The undersigned agrees to accept the conditions of the Approved Final Forest Conservation Plan No. \_\_\_\_\_ including financial bonding, forest planting, maintenance, and all other applicable agreements.

Developer's Name: Holton-Arms School  
 Contact Person or Owner: Rod Turnbough, Facilities Director  
 Address: 7303 River Road, Bethesda, Md. 20817  
 Phone and Email: (301)865-4697 rod.turnbough@holton-arms.edu  
 Signature: \_\_\_\_\_

**SSI** SITE SOLUTIONS INCORPORATED  
 2010 Observation Drive, Suite 205  
 Germantown, Maryland - 20876  
 (301)-840-7880 Fax: (301)-840-7891  
 Engineering - Surveying - Planning - Landscape Architecture

Seal of a Qualified Professional  
 Signature: [Signature]  
 Date: 4/10/13



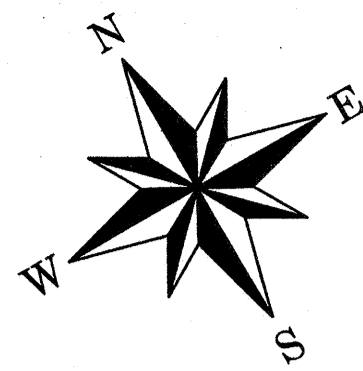
NO	REVISION	DATE
4	Revise per coordination with M-NCPFC Staff	4/9/13
3	Revise per 5/24/12 M-NCPFC Staff comments	10/18/12
2	Revise per 6/14/12 M-NCPFC Staff comments	7/10/12
1	This sheet updated 2/16/12	2/16/12

OWNER:  
**HOLTON-ARMS SCHOOL**  
 7303 RIVER ROAD  
 BETHESDA, MARYLAND 20817-4697  
 301-365-5300  
 ATTN: ROD TURNBOUGH

FINAL FOREST CONSERVATION PLAN - PROPOSED CONSERVATION EASEMENTS  
**HOLTON-ARMS SCHOOL**  
 PARCEL 2, BURNING TREE VALLEY PLAT No. 17150  
 BETHESDA (7th) ELECTION DISTRICT MONTGOMERY COUNTY, MARYLAND

DATE	4/10/2013	SHEET	6 OF 9
SCALE	1" = 60'	PROJ. NO.	1833

FINAL FOREST CONSERVATION PLAN  
HOLTON-ARMS SCHOOL  
SITE SOLUTIONS, INC.



MATCHLINE SEE SHEET 6 of 9



**LEGEND**

Boundary of proposed Category I Conservation Easement

Current Conservation Easement Boundary to be Modified

**DEVELOPER'S CERTIFICATE**  
 The Undersigned agrees to comply with the terms of the Approved Final Forest Conservation Plan No. \_\_\_\_\_ including Forest Steward, Forest planting, maintenance, and all other applicable agreements.

Developer's Name: Holton-Arms School  
 Forest Steward Name: \_\_\_\_\_  
 Contact Person or Owner: Rod Turnbough, Facilities Director  
 Phone Name: \_\_\_\_\_  
 Address: 7303 River Road, Bethesda, Md. 20817  
 Phone and Email: (301)365-5300 rod.turnbough@holton-arms.edu  
 Signature: \_\_\_\_\_

**SSI** SITE SOLUTIONS INCORPORATED  
 20410 Observation Drive - Suite 200  
 Germantown - Maryland - 20876  
 (301)-540-7990 Fax: (301)-540-7991  
 Engineering - Surveying - Planning - Landscape Architecture

Signature & Seal of Qualifying Professional



NO	REVISION	DATE
4	Revise per coordination with M-NCPPC Staff	4/9/13
3	Revise per 9/24/12 M-NCPPC Staff comments	10/18/12
2	Revise per 6/14/12 M-NCPPC Staff comments	7/10/12
1	This sheet updated 2/16/12	2/16/12

**OWNER:**  
 HOLTON-ARMS SCHOOL  
 7303 RIVER ROAD  
 BETHESDA, MARYLAND 20817-4697  
 301-365-5300  
 ATTN: ROD TURNBOUGH

FINAL FOREST CONSERVATION PLAN - PROPOSED CONSERVATION EASEMENTS

**HOLTON-ARMS SCHOOL**  
 PARCEL 2, BURNING TREE VALLEY PLAT No. 17150  
 BETHESDA (7th) ELECTION DISTRICT MONTGOMERY COUNTY, MARYLAND

DESIGN	DWR	SCALE	1"=60'
CHECKED	MD		
DATE	4/10/13	SHEET	7 OF 9
PROJ. No.	1833		

HOLTON ARMS SCHOOL SITE SOLUTIONS, INC.







Citation No. EPD 000001

Administrative Citation  
Forest Conservation  
The Maryland-National Capital Park and Planning Commission  
vs.

Name: Rodney Turnbough  
First Middle Last

Company/Position: Holton - Arms School - Director of Facilities

Address: 7303 River Road Bethesda MD 20817

Phone Number: 301-365-6072 Fax Number: \_\_\_\_\_ Email: rod.turnbough@holton-arms.edu

**Location and Description of Violation:**  
Address/location of site: Lower School Field 7303 River Road Bethesda MD 20817  
and category 1 conservation easements on field

Pursuant of the M-NCPPC's authority under Chapter 22A of the Montgomery County Code, it is formally charged that the above named defendant on 06/22/10  
(date) at the stated site location did commit the following:

Failure to comply with the conditions of revised final forest conservation plan  
#CBA-1194C signed and approved by MNCPPC on 12/20/2006

In violation of:  
 Montgomery County Code, Chapter 22A  
 Approval of Final Forest Conservation Plan No. #CBA-1194C  Other: \_\_\_\_\_

**Civil Fine and Compliance:**  
1. (a)  You shall pay a fine of \$ \$500.00 by 07/15/2010 (date) and complete the remedial action listed below  
(b)  You shall pay a daily fine of \$ \_\_\_\_\_ if the original fine has not been paid, by \_\_\_\_\_ (date). The daily fine shall accrue (until the original fine is paid).  
2.  You shall pay a daily fine of \$ \_\_\_\_\_ until the remedial action listed below is completed. This fine shall be paid within 15 days of completion of all remedial action.

**Checks should be made payable to M-NCPPC** and shall be paid during normal business hours at the information Counter of M-NCPPC's Montgomery Regional Office located at 8787 Georgia Avenue, 2<sup>nd</sup> Floor, Silver Spring, MD 20910, 301-495-4610. Failure to comply with this citation may result in further enforcement proceedings and/or issuance of additional citations including additional fines. You may also request a hearing before the Planning Board or the Board's designee. If you elect to request a hearing, you must notify the M-NCPPC Office of the General Counsel, in writing, at 8787 Georgia Avenue, Suite 205, Silver Spring, MD 20910, within 15 days of the citation.

**Remedial Action:**  
1.  1) Comply with all of the conditions set forth on the revised final forest conservation plan #CBA 1194C for the "Lower School Field" this at least includes the legal recording of a plat of correction with abandoning of set areas of easement and the recording of forest plant area K plus planting of area "K" and installation of easement markers  
by: 12/22/2010 (date)  
If remedial action is not completed by 12/22/2010 (date), you shall pay a daily fine of \$ 25.00 a day until work is completed.

2.  You have violated Chapter 22A of the Montgomery County Code, and may be subject to an Administrative Civil Penalty and additional corrective measures.

**Acknowledgment:**  
I sign my name as a receipt of a copy of this Citation and not as an admission of guilt. I will comply with the requirements set forth in this Citation. I have a right to request a hearing for the offense(s) charged. If I do not exercise my right to a hearing, I agree to entry by the court judgment on affidavit for the amount of the fine.

Defendant's Signature: Rod Turnbough Date: 6-22-10

**Affirmation:**  
I solemnly affirm under the penalties of perjury, and upon personal knowledge or based on the affidavit, that the contents of this citation are true to the best of my knowledge, information and belief and that I am competent to testify on these matters.  
Inspector's Signature: Stephen Peck Date: 06/22/2010  
Print Name: Stephen Peck Phone Number: 301-495-4564



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

Mr. Don Rohrbaugh  
Site Solutions Incorporated  
20410 Observation Drive, Suite 205  
Germantown, Maryland 20876

July 23, 2009

Subject: Pre-submission of final Forest Conservation Plan Amendment CBA-1174C-Holton Arms School

Dear Mr. Rohrbaugh:

This letter is to inform you that the pre-submission of an amendment to final Forest Conservation Plan (FFCP) No. CBA-1174C Holton Arms School, has been reviewed. The proposed drainage swale is shown in an existing Category I Conservation Easement previously established at the site. Therefore, the proposal represents encroachment into the easement.

The Montgomery County Planning Board must review the proposed encroachment with a limited amendment to the preliminary plan including the Final Forest Conservation Plan (FFCP) at a public hearing. Please contact Ms. Cathy Conlon, Subdivision Section Supervisor, for the preliminary plan amendment requirements. In the submission of the materials for this request, include a completed FCP amendment application and the required review fee. The FCP application is available on the Department's web site at: [www.MontgomeryPlanning.org](http://www.MontgomeryPlanning.org).

If you have any questions about these comments about the FCP amendment process, please contact me at (301) 495-4551 or electronically at [lori.shirley@mnccpc-mc.org](mailto:lori.shirley@mnccpc-mc.org).

Sincerely,



Lori Shirley  
Planner Coordinator  
Environmental Planning Division

Cc: Cathy Conlon, Montgomery County Planning Department, Acting Subdivision Section Supervisor  
Mike Devine, Site Solutions Incorporated  
CBA-1174C - Holton Arms School file

LS