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May 29, 2003

By Messenger

The Honorable Derick Berlage
Chair

The Montgomery County Planning Board

The Maryland-National Capital Park and Planning Commission

8787 Georgia Avenue

Silver Spring, Maryland 20910

Re: Project Plan No. 9-03001
Site Plan No. 8-03027
Verizon Bethesda Stanford Street Expansion
Telephone Office and Communications Center

Dear Mr. Berlage and Members of the Planning Board:

Verizon is attempting to add the telecommunications infrastructure essential for the growing demands of the Bethesda-Chevy Chase area. Verizon is trying to install needed switching equipment by expanding its existing telephone office and communications center so that communications are not interrupted or dropped because of an overloaded telecommunication system. The expansion will not add a single employee, or trip, or demand for public services, and yet will provide more infrastructure.

We are sending this letter because, as of the date of this letter, we disagree with the Planning Staff recommendations that Verizon must undertake substantial off-site public improvements and modify its property in certain ways with which we disagree. In order to provide our arguments in a timely fashion, we must respond. However, we still will be working with the Planning Staff to see whether we can arrive at an acceptable agreement before the June 5, 2003 Planning Board hearing.

Verizon and the Planning Staff agree with the following facts:

- The proposed addition to the existing telephone switching equipment building will increase the capacity of the switching center to accommodate the growing service

demands of the Bethesda-Chevy Chase area. The proposed development reflects the service needs of the office, residential, and retail market in this area.¹

- The proposed expansion will add space to accommodate additional switching and mechanical equipment and require no additional employees. Therefore, it will not generate additional trips and does not need to be tested for adequacy of public facilities related to transportation.²
- Providing additional service capacity on the existing site eliminates the need of building a new switching facility at another location which may be used for other purposes.³
- The expansion will not increase the number of employees, which is 5, or visitors.⁴
- This addition will not generate additional trips and therefore does not need to be tested for adequacy of public facilities related to transportation.⁵
- Since the proposed expansion will not add any roads or generate any additional traffic, the relationship between the building and the circulation system will remain functional as it is today.⁶
- The building will remain compatible with the surrounding commercial development in building footprint, height, and mass.⁷
- The operation of the switching center will support other and not be detrimental to existing or potential development in the general neighborhood.⁸
- The operation of the switching center will support and not be detrimental to existing and proposed adjacent development.⁹

We enclose a copy of the May 21, 2003 Planning Staff Memorandum.

¹ Staff report, page 11.

² Staff report, page 13.

³ Staff report, page 13.

⁴ Staff report, page 7.

⁵ Staff report, page 10.

⁶ Staff report, page 11.

⁷ Staff report, page 11.

⁸ Staff report, page 12.

⁹ Staff report, page 15.

Before



After



We take issue with some of the Planning Staff's recommendations as explained below.

Instead of the Staff's recommendations, we respectfully recommend that the following list of conditions are fair and appropriate for the application and provide a "rough proportionality"¹⁰ to the negligible impact that Verizon's addition will have.

Our recommendations are as follows:

- 1) Within the Wisconsin Avenue right of way, for the length of the Verizon building, the applicant shall:
 - a) Install Bethesda Streetscape brick paving
 - b) Widen tree mulch beds to 5 feet where widening would not reduce the sidewalk width to less than 5 feet, as shown on the revised landscaping plan.
- 2) Between the public right of way and the Wisconsin Avenue building façade, the applicant shall install the improvements shown on the revised landscaping plan, including: benches, landscaping and flowers, and a trash receptacle.
- 3) The applicant shall work with M-NCPPC Staff to provide recreational facilities at one of the M-NCPPC parks in the local area. The recreation facilities shall be completed prior to occupancy of the proposed expansion, or as agreed to by the M-NCPPC Parks Department. The cost of such recreational facilities shall be reasonable and in proportion to the negligible impact of the proposed expansion. In no event shall such costs exceed \$25,000.

¹⁰ *Dolan v. City of Tigard*, 512 U.S. 374, 391, 114 S.Ct. 2309, 2319, 129 L.Ed. 2d 304, __ (1994)

- 4) Prior to the occupancy of the proposed expansion, the applicant shall convey by deed, at no cost to the State Highway Administration, a 10-foot right-of-way truncation near the corner of Wisconsin Avenue and Stanford Street.
- 5) Additional Conditions for Site Plan 8-03027, as written in the May 21, 2003 Planning Staff Memorandum.

Below, we explain our reasons for recommending the above conditions of approval.

Off Site Improvements: Verizon Objects to Staff's Recommendation for Utility Undergrounding and Bethesda Metro Core Streetscaping

Verizon will not add a single employee, a single pedestrian, a single trip, or a single demand for any other public services. The new space will only house equipment so that communications will not be delayed or interrupted. Adding the capacity there avoids tearing up the streets and sidewalks of Bethesda to run more cabling from a new facility and avoids using other scarce CBD land for a new facility. If another existing facility, located further away, were used, extending underground telecommunication cabling through the Bethesda area would be disruptive.

Accordingly, we do not agree with the Staff's recommendations of:

- Undergrounding utilities for the full length of Wisconsin Avenue between Stanford Street and Walsh Street; and
- Wrapping the full Bethesda Metro Core streetscape from the rear alleyway west down Walsh Street, south along Wisconsin Avenue, and east along Stanford Street.

Such improvements bear no relationship, much less a "rough proportionality," to the negligible impact of Verizon's addition. Such an imposition would be contrary to the County statute and federal constitutional takings law.

The Staff offers two insufficient reasons to justify the recommendation for imposing all of the public improvements described above. One, Verizon is using the optional method of development. Two, Verizon is permitted to develop up to 2.3 FAR under the optional method, in the CBD-1 zone.¹¹

Staff failed to consider the fact that Verizon's addition has no impact. The Staff incorrectly concluded that if one merely applies for a development approval under the optional method, the project is "fair game" for the installation of all desired public improvements, regardless of the project's impact. Further, the Staff incorrectly concluded that if as in Verizon's case, an applicant applies for square footage within the limits of the FAR duly established by law, merely using the statute for the intended

¹¹ The District Council enacted Zoning Text Amendment 03-04, by Ordinance No. 15-03, which permits a telephone office or communications center to develop to a 2.3 FAR in the CBD-1 zone.

purpose is grounds for the imposition of desired public improvements, again, regardless of the project's impact.

Such reasoning is contrary to the language of the Project Plan provisions under Section 59-D-2.11.

County statutory language is consistent with constitutional law. Under Section 59-D-2.11 of the County Zoning Ordinance, at page 59D-20-21, page dated November 1998, it provides:

In order to ensure that the development will include the public facilities, amenities and other design features that will create an environment capable of supporting the greater densities and intensities by the optional method of development, the developer is required to submit a project plan as part of the application for the use of the optional method; and a site plan must be approved in accordance with the requirements of division 59-D-3 prior to the issuance of building permit.

(Emphasis added.)

The statute provides that the nature of the proposed development, itself, must cause a change in the environment or add a greater burden that must be "supported" with additional public facilities. Such language is not only reasonable and fair, but it is also consistent with constitutional law.

Verizon is adding only two small floors for equipment which obviously will add some bulk. The bulk might cast a slightly different shadow. The new darker roof will complement the stone façade that is being continued for the addition.

However, the addition will not add a single employee, a single trip, or require any other additional demands on public facilities or amenities. It will not create any greater "density or intensity" that the Project Plan statute addresses. The addition would have the same relevant impact to the community if the rooms were empty. Further, the equipment will add to the community's infrastructure.

The words "an environment capable of supporting the greater densities and intensities" are intended to be considered together, not cut up separately. The Verizon building is to be expanded slightly, but it will not change the environment. Nothing will need to be "supported."

The Project Plan application allows the Planning Board to consider whether or not Verizon's addition of two small floors next to the alley would create greater density and intensity that must be "supported." The conclusion should be that the addition does not create any density that must be supported.

The Site Plan is to be consistent with the Project Plan, under Section 59-D-3.1(c), which provides:

If the site plan is for the optional method of development in a CBD Zone, it must be consistent with a project plan approved under Division 59-D-2.

Accordingly, the Site Plan provisions flow from the Project Plan impact considerations.

The proper application of the County's Project Plan statute and Site Plan statute eliminates the need to refer to federal constitutional law pertaining to exactions for off-site improvements to support Verizon's position. Nonetheless, the imposition of undergrounding utilities and the Metro Core District level of streetscaping is contrary to constitutional law. Under the Supreme Court cases and state court cases pertaining to exactions for off-site dedications or off-site public improvements imposed at the time of development approvals, the courts have recognized that the *Nollan/Dolan* exactions test is appropriate, whether the matter involves an outright dedication or the improvement of public right of way.¹² In Verizon's case, the Staff recommends both a dedication of land and off-site public improvements. We are not referring to federal constitutional case law or a recent Maryland case pertaining to the imposition of on-site restrictions.¹³

Writing for the majority in the *Dolan* case, Chief Justice Rehnquist wrote the following, which we believe to be the proper consideration by the Planning Board:

We think the reasonable relationship test adopted by a majority of the state courts is closer to the federal constitutional norm than either of those previously discussed. But we do not adopt it as such, partly because the term "reasonable relationship" seems confusingly similar to the term "rational basis" which describes the minimal level of scrutiny under the Equal Protection Clause of the Fourteenth Amendment. We think a term such as "rough proportionality" best encapsulates what we hold to be the requirement of the Fifth Amendment. No precise mathematical calculation is required, but the city must make some sort of individualized determination that the required dedication is related both in nature and extent to the impact of the proposed development.¹⁴

Thus, the off-site utility undergrounding recommendation and the off-site sidewalk improvements recommendation must be considered in light of the addition's negligible

¹² *City of Monterey v. Del Monte Dunes at Monterey, Ltd.*, 526 U.S. 687, 119 S.Ct. 1624, 143 L.Ed.2d 882 (1999); *Dolan v. City of Tigard*, 512 U.S. 374, 114 S.Ct. 2309, 129 L.Ed. 2d 304 (1994); *Lucas v. South Carolina Coastal Council*, 505 U.S. 1003, 112 S.Ct. 2886, 120 L.Ed.2d 798 (1992); *Nollan v. California Coastal Commission*, 483 U.S. 825, 107 S.Ct. 3141, 97 L. Ed. 2d 677 (1987); *Town of Flower Mound v. Stafford Estates Limited Partnership*, 74 S.W.3d 18 (Tex.App.-Fort Worth 2002); *Ehrlich v. City of Culver City*, 12 Cal.4th 854, 911 P.2d 429, 50 Cal.Rptr.2d 242 (1996); *Christopher Lake Development Company v. St. Louis County*, 35F.3d 1269 (8th Cir. 1994).

¹³ *City of Annapolis v. Waterman*, 357 Md. 484, 745 A.2d 1000 (2000).

¹⁴ *Dolan v. City of Tigard*, 512 U.S. 374, 391, 114 S.Ct. 2309, 2319-2320, 129 L.Ed. 2d 304, ___ (1994)

impact. The reasons for treating a dedication and any off-site exaction in the same fashion is explained well in the following quotation:

Applying the *Dolan* test to development exactions that require the dedication of land, but not to exactions that require the payment of fees or the making of public improvements, would result in a bifurcated review of development exactions in situations in which a city conditioned development of a particular parcel on both types of exactions. Because both types of exactions involve conditional governmental land use approval and present the same opportunities for governmental "leveraging," we believe the most workable solution is to subject both types of exactions to the same constitutional test. *See, e.g., Art Piculell Group*, 922 P.2d at 1230 (applying *Dolan* test to development exactions that required a ten-foot property dedication and partial improvement of street abutting proposed subdivision).¹⁵

The Planning Board cannot simply apply a "one size fits all" rule. The Planning Board must not conclude that simply because Verizon is applying under the Project Plan and Site Plan process, Verizon is bound to install the full panoply of public improvements, as if Verizon were filling an office building with dozens of new employees.

The Planning Board must make an "individualized determination" as to the impact of Verizon's small addition that will be filled with equipment only. The impact is negligible. Any imposition of public improvements should reflect the same meager impact.

In the instant case, provided that other conditions of approval are acceptable, Verizon, nonetheless, would agree to dedicate a 10-foot truncation area near the corner of Wisconsin Avenue and Stanford Street. Such a dedication, however, is not caused by adding equipment to the building, but Verizon would do so in an effort to cooperate. Further, Verizon has offered to make certain enhancements to the Wisconsin Avenue streetscape as shown on the revised landscape plan, and as discussed further below.

We hope that the Planning Board will decide that, yes, two floors of equipment and a new penthouse add insignificant bulk to the building, but the intensity and the environment would not change by any measure. Stated another way, we hope that the Planning Board will conclude that whatever the impact is, however slight, the Staff's recommendations are not "roughly proportional" to Verizon's impact, and that Verizon's suggested conditions of approval are fair because they are roughly proportional to Verizon's negligible impact.

¹⁵ *Town of Flower Mound v. Stafford Estates Limited Partnership*, 71 S.W.3d 18, 33 (Tex.App.-Fort Worth 2002).

In short, we expect that the Planning Board will agree with the following quotation from a zoning and land use treatise:

[T]he development review process cannot simply be used to extort public benefits that are not substantially related to public interest aspects of private development applications.¹⁶

Verizon's Offer to Provide Off-Site Streetscape Improvements and a Dedication

As noted above, even though the addition will have a negligible impact, provided that the other conditions of approval are acceptable, Verizon has offered to make the following public improvements.

Along Verizon's Wisconsin Avenue Frontage

- 1) Installing Bethesda Streetscape brick pavers.
- 2) Widening the mulch beds for the existing 2-3 story tall trees.
- 3) Planting a new tree.
- 4) Dedicating a 10 foot truncation near the corner of Wisconsin Avenue and Stanford Street.

¹⁶ Rathkopf's The Law of Zoning and Planning, Volume 5, Release #3, 9/02, Page 90-146-90-147. Section 90:45

View of Existing Trees in Mulch Beds and Shrubbery along Wisconsin Avenue



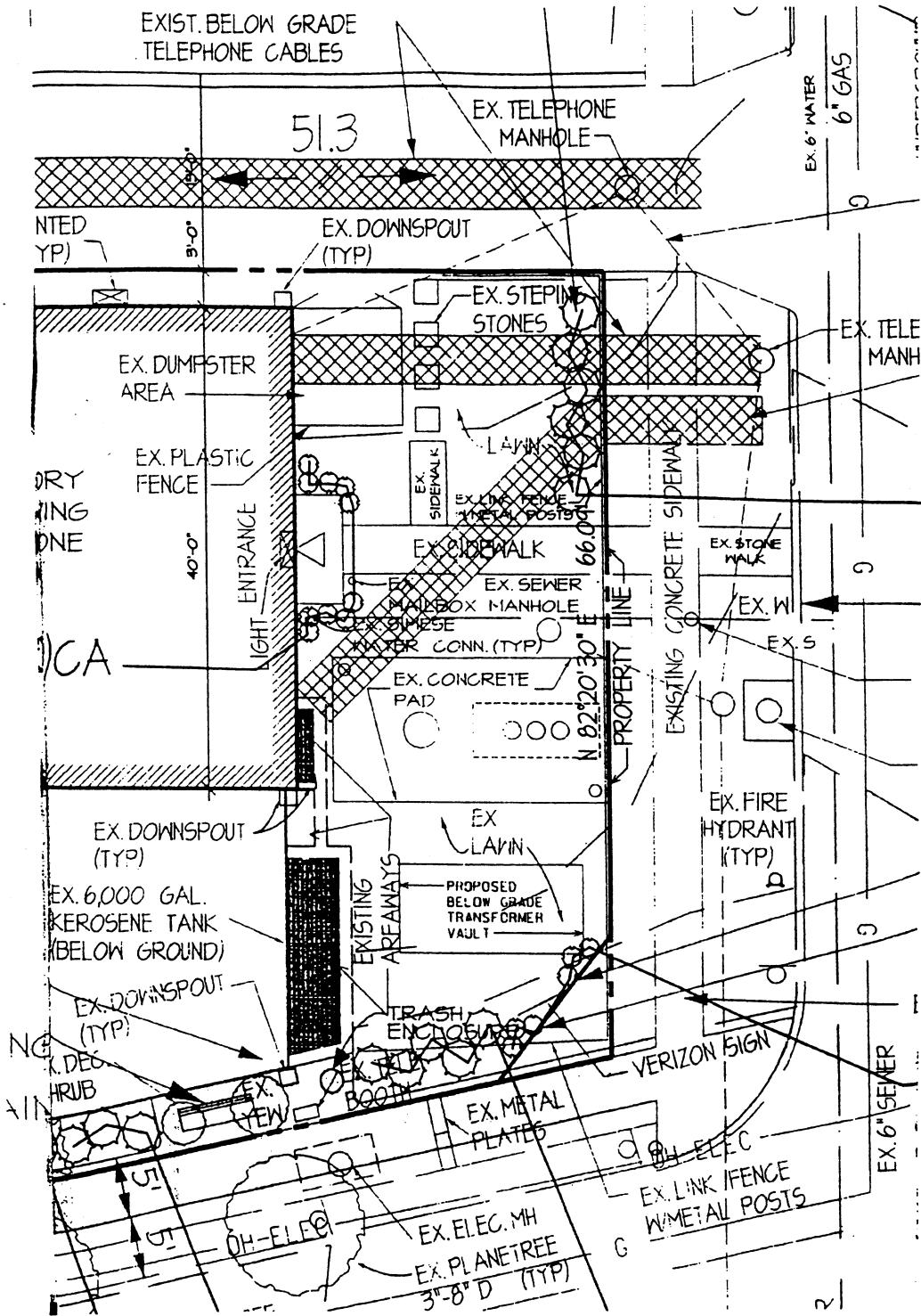
Stanford Street

Verizon has not offered to make public improvements along Stanford Street for sound reasons. Again, Verizon's addition has no impact on public facilities; therefore, it is not required to do so. In addition, unnecessary construction should be avoided. Substantial underground improvements already cover the area and a new transformer will be installed there. Such improvements are shown on the Site Plan. They are:

- Underground cabling
- Sewer and water pipes
- 6,000 gallon fuel tank
- A new transformer vault to be installed in the area between the underground fuel tank and the Wisconsin Avenue sidewalk.
- Two raised areaways covered with grates.
- One of the areaways is used for air discharged from the radiator that is part of the underground diesel generator. The discharged air is warm. Further, when in operation, the generator may be heard easily if one were next to or on top of the areaway.

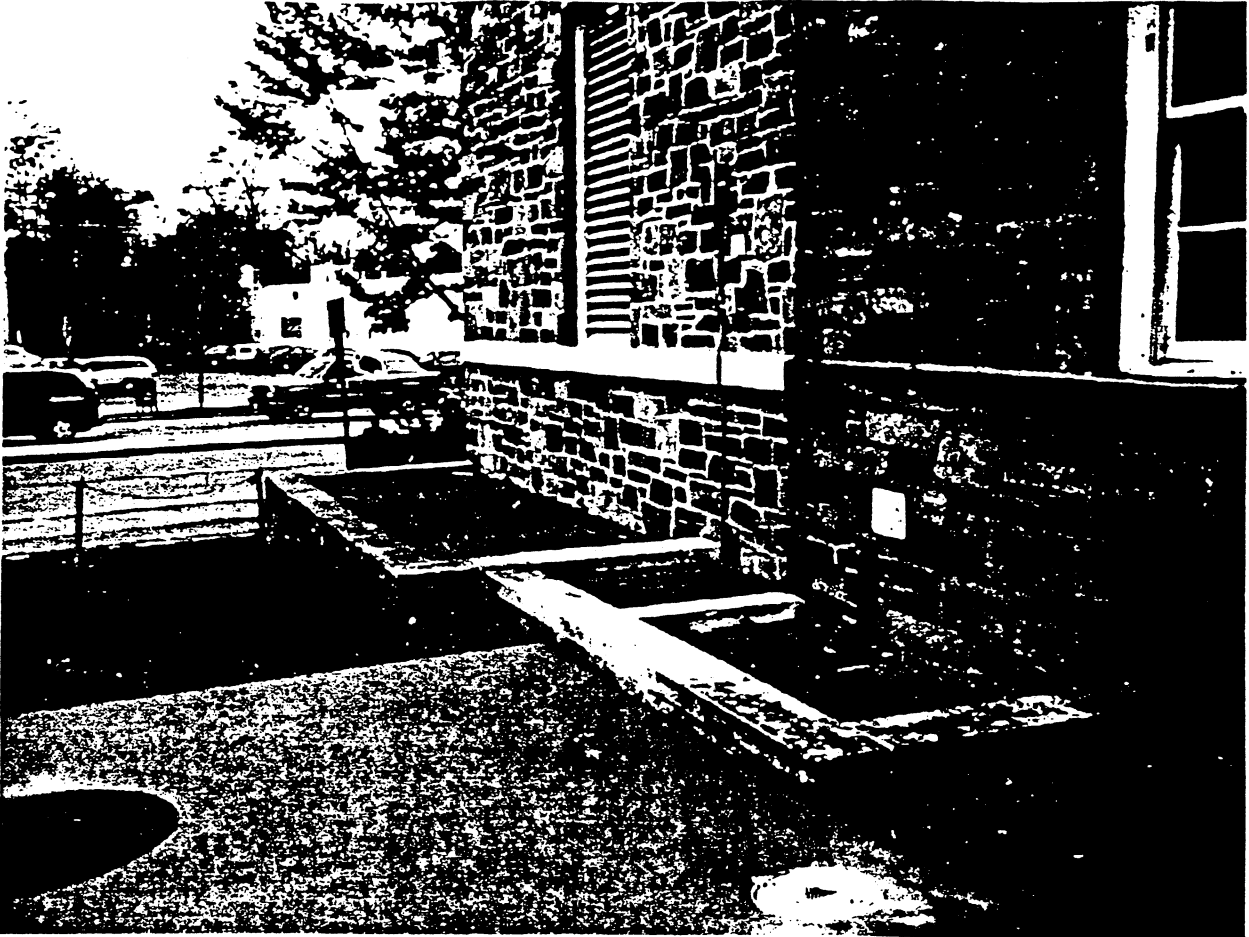
- The other areaway will be used for a gas vent chamber for the new incoming cable and conduit entering the building. A cover with two short pipes will protrude from such areaway.

Please see the section from the revised landscape plan shown below.



Please also see the photos of the Stanford Street yard below.

View of Areaways and Concrete Pad on Top of the 6,000 Gallon Fuel Tank



View of Fire Hydrant, Fuel Tank Concrete Pad, Stormdrain and Manhole



View of Board-on-Board Fence Surrounding the Dumpster



Rather than recommending that every effort should be made to provide a few shade trees,¹⁷ any deep rooted plantings, including shade trees, should be *prohibited* along the Stanford Street frontage. Shade tree roots are likely to damage either Verizon's cabling or one or more of the other underground improvements. Only plants with shallow roots, like grass, should be maintained in the Stanford Street right of way.

Even if Verizon's impact warranted the requirement to install streetscape, the Staff's recommendation is well beyond the Sector Plan recommendation. According to Section 10.C, page 262-263 of the Bethesda CBD Sector Plan, only "Level Five Streetscape" would be required, which provides, "Provide Level Five Streetscape along all other streets within the Sector Plan area."

Level Five is defined as "concrete sidewalks, tightly spaced street trees, and Washington Globe street lighting." Similarly, Figure 6.1, at page 188 of the Sector Plan, shows that Stanford Street is not to be improved to Metro Core standards.

As for meeting Level Five Streetscape, the one type of improvement that would be reasonable under the circumstances, already exists today. It would not be prudent to follow the other recommendations. The existing sidewalk already is made of concrete.

¹⁷ Staff Report, page 9.

(Level Five does not require Bethesda Streetscape brick paving.) As stated earlier, the roots of "tightly spaced street trees" would likely damage the underground improvements. Therefore, planting trees would not be reasonable or prudent. Similar to the roots, the chance that the construction and maintenance of the wiring, conduit, etc. associated with Washington Globe lights would interfere with the underground improvements is serious enough to warrant avoiding such improvements.

Walsh Street

Verizon has not offered to make public improvements along Walsh Street. Again, the addition has a negligible impact. Only about 27 feet of Verizon's building fronts along Walsh Street. In contrast, the Staff recommends that Verizon improve about 120 feet of Walsh Street. The Sector Plan would only recommend that Walsh Street have Level 5 streetscape. The existing concrete sidewalk is adequate. Similar to Stanford Street, there is a major cable leading into the Walsh Street side of the building. For the same reasons as Stanford Street, even the Level Five street improvements would not fit Verizon's Walsh Street frontage.

One size does not fit all.

Verizon's proposed steps more than adequately accommodate the negligible impact of filling in a cavity over the existing two story area, and adding a penthouse that will be all but invisible. Again, Verizon will not add a single employee, a single pedestrian, a single trip, or a single demand for any more public services. Verizon need not make any public improvements, but has offered to provide a fair and prudent level of improvements along Wisconsin Avenue.

Satisfaction of Section 59-C-6.233. In Lieu of Providing 20% On Site Public Amenity Space, Improving Off-Site Public Space

From the beginning of its work regarding ZTA 03-04, which does not require Verizon to provide public amenity space on site, Verizon raised the matter of its inability to provide on-site public amenity space.

Nonetheless, despite Verizon's reasonable assumption that no such on-site space would be required, Verizon offers to install public amenity space on a strip of land between the public right of way and the Wisconsin Avenue facade.

Verizon cannot reasonably provide public amenity space in its Stanford Street yard. Verizon has always accepted the obligation to meet the alternative requirement provided under Section 59-C-6.233.

The Stanford Street Yard Should Not be Used for Public Amenity Space

Although it is unclear, the Staff report appears to recommend requiring Verizon to establish a public amenity area on top of Verizon's Stanford Street yard, even though numerous underground improvements are located there. Please see the section of the

revised landscaping plan which indicates the various underground improvements. Earlier, we described the underground improvements located there.

We do not believe that such an area is a proper area for public use. In addition to the other merits of our position, we believe that the District Council agrees with our position. The District Council enacted Ordinance No. 15-03, ZTA 03-04, referenced above. Its opinion at page 3 noted the following:

The worksession on ZTA 03-04 was held on April 3, 2003, which was before the April 8, 2003 before (sic) the public hearing. After a careful review of the ZTA, the Committee recommended, pending any new issues being raised at the public hearing, that ZTA 03-04 be approved with a revision to allow an applicant under the CBD-1 optional method procedure, to provide off-site public use space, or improvements to existing public use space, as an alternative to providing public use space on-site. **It was recognized by the Committee that in the case of a building not constructed under the optional method procedure that occupies most of the site, to provide the public use space on site would be difficult.**

(*Emphasis added.*) Considering that the ZTA 03-04 was enacted at least in part to address Verizon's building, it is not unreasonable to assume that the District Council agreed that inviting the public on the Stanford Street yard was not prudent.

It would also have been reasonable for the District Council (and Verizon) to conclude that the Planning Board and the Planning Staff also opposed locating public use space on top of the underground improvements in the Stanford Street yard.

The Planning Board's March 27, 2003 memorandum to the District Council, at page 2, reads:

Section 59-C-6.233 requires a minimum public use space in the CBD-1 Zone under the optional method of development of 20% of the net lot area. **The Verizon building does not have any area suitable for public use space.**

(*Emphasis added.*) The Planning Staff's report to the Planning Board makes the same finding. The Staff's March 21, 2003 memorandum, at page 3, reads:

Section 59-C-6.233 requires a minimum public use space in the CBD-1 Zone under the optional method of development of 20% of the net lot area. **The Verizon building does not have any area suitable for public use space. The small patch of grass fronting on Stanford Street, on the south end**

of the site, covers underground cabling and an underground tank for diesel fuel. Staff, therefore, believes that an opportunity for providing off-site public use space should be explored by Verizon. Alternatively the developer could consider additional amenities in lieu of strict adherence to the public use space requirements.

(*Emphasis added.*) Therefore, it would have been reasonable to assume that the Planning Board and the Planning Staff had already determined that on-site public amenity space is inappropriate for the entire site. For the same reason, providing public amenity space for the Stanford Street yard is similarly inappropriate.

For the above reasons, Verizon opposes providing public amenity space on the Stanford Street yard. The Planning Board should support Verizon's position.

Verizon's plans for enhancing the Stanford Street yard show:

- Planting attractive landscaping with shallow roots.
- Leaving the low, not intimidating, single link fence with metal posts around the perimeter.

Verizon does *not* agree to make the following improvements recommended by the Staff for the reasons indicated in italics:

- Remove the link fence with metal posts. (*The small fence unobtrusively prevents the public from cutting the corner of the property and leaving a dirt path and the fence gently keeps the public away from the underground improvements.*)
- Replace the existing concrete lead walk between the building and the property line with Bethesda Streetscape brick paving. (*The Sector Plan only requires concrete sidewalks for Level Five streetscape within the public right of way. The existing concrete lead walk matches the concrete sidewalk. A brick lead walk is unnecessary, unwarranted, and would not match the concrete sidewalk.*)
- Remove the existing sidewalk and stepping stones between the lead walk and the alley (*The sidewalk and stepping stones are used by individuals who use the building. They serve a purpose for the building's operations.*)
- Provide planting to screen the dumpster area. (*The dumpster area is already screened by a board on board fence. Room in the area must be available for people to pass by and to work there near the dumpster.*)
- Revise the landscape plan to enhance the visual quality of the space. (*The requirement is so general that it is meaningless. Verizon would be glad to install the landscaping shown on the revised landscape plan.*)

The Strip of Verizon Land Along the Wisconsin Avenue Side of the Building

Provided that the other conditions of approval are acceptable, Verizon has offered to modify and re-landscape a narrow strip of Verizon land, located between the right of way and the wall of its Wisconsin Avenue façade, as follows:

- Brick pavers.
- Three benches.
- New landscaping and flowers.
- Trash enclosure.

Please see Verizon's amended Site Plan and Landscape Plan. The above improvements to the Verizon property would complement the installation of the Bethesda Core Streetscape when and if the appropriate public or private entity chooses to do so.

Improvements to Off-Site Public Amenity Space In Lieu of Providing 20% On Site, Section 59-C-6.233

For some time, including the time when the Staff report was being prepared, Verizon has been in contact with Mr. Doug Powell of M-NCPPC Parks and with Mayor Mier Wolf of the Town of Chevy Chase to determine what improvements might be proper candidates for Verizon's obligation to improve off-site public use space, in lieu of satisfying the 20% requirement on site. The specific improvements have not been identified and confirmed as of the date of this letter. Verizon understands that one option under discussion has been to construct a 300 foot pathway and relocate play equipment near the Air Rights building and the Crescent Trail. Verizon has always agreed to install a reasonable level of off-site public amenity space improvements pursuant to Section 59-C-6.233. In order to provide some guidance, we recommend that the Planning Board establish a maximum dollar amount of \$25,000.

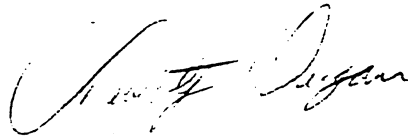
For all of the above reasons, Verizon respectfully suggests the following conditions of approval as fair and reasonable:

- 1) Within the Wisconsin Avenue right of way, for the length of the Verizon building, the applicant shall:
 - a) Install Bethesda Streetscape brick paving
 - b) Widen tree mulch beds to 5 feet where widening would not reduce the sidewalk width to less than 5 feet, as shown on the revised landscaping plan.
- 2) Between the public right of way and the Wisconsin Avenue building façade, the applicant shall install the improvements shown on the revised landscaping plan, including: benches, landscaping and flowers, and a trash receptacle.

- 3) The applicant shall work with M-NCPPC Staff to provide recreational facilities at one of the M-NCPPC parks in the local area. The recreation facilities shall be completed prior to occupancy of the proposed expansion, or as agreed to by the M-NCPPC Parks Department. The cost of such recreational facilities shall be reasonable and in proportion to the negligible impact of the proposed expansion. In no event shall such costs exceed \$25,000.
- 4) Prior to the occupancy of the proposed expansion, the applicant shall convey by deed, at no cost to the State Highway Administration, a 10-foot right-of-way truncation near the corner of Wisconsin Avenue and Stanford Street.
- 5) Additional Conditions for Site Plan 8-03027, as written in the May 21, 2003 Planning Staff Memorandum.

Thank you for your consideration.

Respectfully submitted,



Timothy Dugan

Enclosure

cc: Montgomery County Planning Board Members
The Honorable Mier Wolf, Town of Chevy Chase
Mr. Jay S. Welch, Verizon
Mr. Steven R. Wingert, Verizon
Mr. G. Donald Heath, Verizon
Mr. Gregory A. Brenner, William Doggett Architects
Ms. Karen Carpenter, Apex Engineering
Mr. Charles R. Loehr, M-NCPPC Director
Mr. Joseph R. Davis, M-NCPPC Development Review
Mr. Michael Ma, M-NCPPC Development Review
Tariq El'Baba, Esq., M-NCPPC General Counsel's Office