



Barney Rush, *Mayor*
Joel Rubin, *Vice Mayor*
Irene Lane, *Treasurer*
Rich Brancato, *Secretary*
Joy White, *Community Liaison*

December 15, 2022

Grace Bogdan, AICP
Planner III, Down County Planning Division
Montgomery County Planning Department
2425 Reddie Drive, 13th Floor
Wheaton, MD 20902

Dear Ms. Bogdan,

Thank you for the opportunity to comment on the first resubmission of Local Map Application H-148 (the “LMA”) filed by Corso Chevy Chase (“Corso”) on December 5. We (the Town of Chevy Chase -- the “Town”) have carefully reviewed this resubmission and believe that material deficiencies still exist in the proposed plan. While we have repeatedly shared that, in concept, the Town does not oppose the proposed senior housing use, we will oppose the LMA unless our concerns are addressed.

Building Height

In response to the Town’s comments on the initial LMA submission, Corso represents that the project complies with the County’s definition of neighborhood compatibility. The developers focus on complying with the 45-degree angular plane projection standard set forth in the Montgomery County Zoning Ordinance (the “Zoning Ordinance”). We believe that the Zoning Ordinance establishes a minimum building height that is one, but not the only, finding necessary to ensure that the project is truly compatible with the surrounding community. Meeting only this standard is not sufficient considering this project, which is surrounded on three sides by a long-established single-family community, especially for a project as large and dense as the Corso project.

Our Town Code prohibits houses taller than 33 feet from predevelopment grade, measured to the peak of the roof. However, many of the Corso buildings along the perimeter of the development will be 79 feet high, measured to the peak of the roof. Further, this height is measured from the common measuring point, and there are several positions around the property where the ground level falls below the common measuring point, thereby adding to the actual building height from existing grade. As a result, the “five story” buildings proposed by Corso are at least 2.4 times as high as the surrounding homes. This is not compatible with our Town.

In our prior comments, we asked what we believed was entirely reasonable in establishing compatibility: that the height of the perimeter buildings be held to 4 floors. Even this height,

measured to the peak of the roof, is 66 feet, or exactly double what is allowed in our Town. We continue to believe that such a height is the maximum that is appropriate. The developers have not taken our views into account.

Specifically:

- We see no evidence that taller buildings are in the center of the project, as Corso has previously stated was reflected in their design and which we supported. Indeed, the resubmission continues to show that the two buildings nearest the center are only 35” and 45” feet high --offering ample room to shift density towards the middle of the project.
- In the resubmission, Corso is proposing to RAISE the height of the west wing of building C1, on the southeast corner of the development, from 4 to 5 stories. This was not mentioned in the letter sent to the Town.
- Building A1 is particularly problematic, because here the land slopes down, exposing the full height of the garage level that is below the common measuring point. For this reason, we requested that the height of this corner be held to 3 floors of living space, which would be the actual equivalent of 4 floors. Corso has ignored our request; and because the wings of this building are short, the bulk of this building, with 5 stories, will appear to be 90 feet high to residents. We continue to hold the view that the corner of this building should be 3 floors above the garage, and that the western portion of the 5-floor area of this building be reduced to 4 floors.
- No changes in height have been proposed for the two buildings on the west side of the site, nor to building A3

In sum, we want Corso to understand that the proposed building heights along the perimeter of the project are of significant concern to the Town, and we will oppose any plan that fails to respond to our concerns.

Additionally, in any future presentation of views, we ask that Corso show the cell tower antennae that will be located on the property, accurately depicting its height and mass and relationship to the single-family neighborhood.

Public Paths

In its resubmission, Corso rejects our modest request for an adjustment to the public pathways. The Town supports paths from the project to both Woodside Place and Thornapple Street. What we asked for was the elimination of the short pathway that would run directly from the southeast corner of building C1 to Connecticut Avenue. The stretch of path that runs along the east side of building C1 to the main entrance would remain in the plan. We want to facilitate connection among all Town residents, both those in single-family homes and in Corso, but we do not want to create a new public walkway that would lead directly from Connecticut Avenue to Woodside Place.

Parking

The developers represent that they do not intend to have anyone in the Corso community park on Town streets. But the response to the Town is inadequate and does not demonstrate a commitment to ensure that this problem will not occur. We need to review a careful analysis, built up of the following components: the number of employees coming daily who are expected

to drive, the number of residents who are expected to have cars, and the number of visitors expected on peak days of visitation.

Traffic

Corso has determined that the plans are not subject to a Local Area Transportation Review, because of the Wells and Associates “study” that demonstrates traffic will be reduced, compared to the time when the property was active as a 4–H conference center. This study presents a grossly inaccurate account of the traffic present when the 4–H center was active. It was never an active “hotel,” generating the hypothetical amount of traffic attributed to that use. Most of the students who attended sessions at the center were transported in buses, and the number of staff was few. We are certain that Corso will bring a substantial increase in traffic, including employees and visitors, compared to the time when the 4–H center was active. Therefore, we reject the developers’ assertion that they are exempt from the LATR, and we view the commitment for a new comprehensive traffic study, set out as a Binding Element, as a vital undertaking.

Trees and Forest Conservation Area

We understand the regrettable need to cut down the trees -- many tall and beautiful -- in the center of the site. It would not be possible to develop the land, with an underground garage, without doing so. But we are concerned with the number of canopy trees that are slated to be cut down near and just within the future boundaries of the forest conservation areas. We want to make sure that such removals are minimized. In this regard, any required tree variances being requested to allow removal of specimen trees must be evaluated in earnest based on hardship (as mandated by State and County law).

We also note that, so far, the developers have only considered the County ordinance regarding tree removal and protection. Corso must still comply with the Town’s urban forest ordinance, which protects substantially more trees than the County ordinance.

Project Phasing

We have yet to see renderings of what the site will look like upon completion of Phase 1 and before Phase 2 is built. A rendering showing Phase 1 alone, from the vantage point of the “Aerial – West” perspective in the massing attachment, would be very helpful. We need to understand how Corso intends to provide interim landscaping and screening of the area on which the Phase 2 buildings will be erected. Assurances must be provided at the time of rezoning consideration that reasonable measures will be included with the Phase 1 site plan approval that allow for the Phase 2 area be compatible with the surrounding neighborhood during the interim period between the construction of Phases 1 and 2.

Storm Water Management:

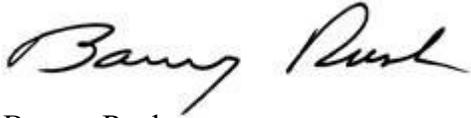
It appears in the latest drawings that all the storm water runoff will be collected and directed through a single pipe to Meadow Lane and that no stormwater will flow through a second existing pipe to Thornapple Street. While we do not have a view at this time as to whether this is an optimal dispersion of stormwater, we emphasize the importance of the Binding Element that sets out the requirement for the Town to be involved in reviewing the storm water management plans. We will be focused on determining a plan that will minimize any stress on the stormwater

pipes running under Meadow Lane and down to Zimmerman Park, where the Meadow Lane pipe joins the Coquelin Run culverts.

Conclusion

We remain supportive of a retirement community being developed within our single-family community. We believe that the changes we are requesting are reasonable and necessary for the finding of compatibility to be made. We trust that the developers will appreciate the important value of gaining support from the Town of Chevy Chase and will be responsive to our strongly held views.

Sincerely,

A handwritten signature in black ink that reads "Barney Rush". The signature is written in a cursive, flowing style.

Barney Rush
Mayor

cc: Robert Kronenberg, Montgomery County Planning Department
Elza Hisel-McCoy, Montgomery County Planning Department