

**BEFORE THE BOARD OF APPEALS
FOR MONTGOMERY COUNTY, MARYLAND**

APPEAL OF WASHINGTON ADVENTIST ACC, :
BOARD OF COUNCIL OF UNIT OWNERS :

OF BUILDING PERMIT NO. 1116230

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Case No.: A-6938

Hearing Date: Dec. 17, 2025

APPLICANT/INTERVENOR’S PRE-HEARING SUBMISSION

In accordance with Section 2A-7(a) of the Montgomery County Code, the Applicant/Intervenor, Adventist HealthCare Mid-Atlantic Corporation (“Applicant” or “AHC”), by and through its undersigned attorney, submits the following information for the hearing scheduled for December 17, 2025, at 9:30 a.m.

A. Supporting Documents – The Applicant may introduce one or more of the following documents at the hearing:

1. Deed – 7600 Carroll Avenue, Takoma Park, MD 20912.
2. Maryland Real Property Article, Sec. 14-108, 14-602, 14-606, 14-607 and 14-608.
3. Leased Parking Area Exhibit
4. Site Plan – with parking availability outside security fence
5. 9/16/25 and 9/29/25 AHC Parking Count PowerPoint
6. Additional AHC Parking Counts.
7. Resume of Anne (Nancy) Randall
8. Resume of William Zeid, PE

9. Any document identified by Appellant.
10. Any document identified by the County.

The Applicant reserves the right to produce relevant provisions of the Montgomery County Code, including provisions of the Zoning Ordinance, as demonstrative exhibits. The Applicant also reserves the right to introduce rebuttal and impeachment documents.

B. Witnesses – The Applicant may call one or more of the following witnesses at the hearing:

1. Geoff Morgan (AHC Vice President, Chief Facilities and Real Estate Officer), 11611 Old Georgetown Road, 2nd Floor, Rockville, MD 20852, will testify about, among other things, AHC’s relationship with Appellant, including former hospital privileges and parking arrangements for Appellant doctors, the decommissioning of the hospital and the proposed hospital demolition plan/schedule.

2. Ann (Nancy) Randall, Traffic Consultant affiliated with William Zeid (below), 32 Maddison Pace Annapolis, MD 2401, will testify about, among other things, Appellant’s parking analysis and applicable parking needs.

3. William Zeid, PE, Kimley-Horn and Associates, 111 Rockville Pike, Suite 1100, Rockville, MD 2080, will testify about, among other things, Appellant’s parking analysis and applicable parking needs.

4. Any witness identified by the Appellant.

5. Any witness identified by the County

6. The Applicant reserves the right to call rebuttal and impeachment witnesses after the Appellant fully explains the basis for this appeal.

C. Persons to be Summoned

None.

D. Estimate of Time to Present Case

The Applicant estimates that it will require no more than 1.5 hours to present its case.

E. Proper Venue for Appellant's Claims

Maryland's Real Property Article makes clear that actions to quiet title, including adverse possession claims, must be brought in the circuit court in the county where the subject property is located. This is evident from section 14-602 of the Real Property Article, titled "Action established" (which falls within Subtitle 6 of the Article entitled "Actions to Quiet Title"), which states that "[a]n action may be brought under this subtitle to establish title against adverse claims to property, including adverse claims in 14-108 of this title." In turn, 14-108(a) dictates that such an action be brought "in the circuit court for the county where the property or any part of the property is located." Moreover, Subtitle 6 contains several sections confirming that circuit court is the exclusive jurisdiction for such suits, including section 14-606, which requires that a verified complaint be filed, section 14-607, which requires an Answer, and section 14-608, which requires that the complaint referenced in 14-606 name all of those persons having adverse claims to the title in question. Further still, Subtitle 6 repeatedly refers to "the court", an obvious reference to the jurisdiction of the circuit courts referenced in 14-108. No plausible reading of these sections would allow administrative agencies to adjudicate a party's right to quiet title to real property in an adverse possession proceeding.

Respectfully submitted,

LERCH, EARLY & BREWER, CHARTERED



Patrick L. O'Neil
William A. Goldberg
7600 Wisconsin Avenue, Suite 700
Bethesda, MD 20814
Phone: 301-657-0741
ploneil@lerchearly.com
Attorney for Applicant/Intervenor

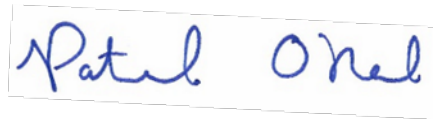
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT, on this 8th day of December 2025, I caused copies of the foregoing Pre-Hearing Submission to be mailed first-class, postage prepaid, and by electronic mail to:

Elana Robison, Esq.
Assistant County Attorney
101 Monroe Street, Third Floor
Rockville, Maryland 20850
elana.robison@montgomerycountymd.gov
Attorney for Montgomery County

and

Soo Lee-Cho, Esq.
7315 Wisconsin Avenue, Suite 800
Bethesda, Maryland 20814
sleecho@bregmanlaw.com
Attorney for Appellant



Patrick L. O'Neil
7600 Wisconsin Avenue, Suite 700
Bethesda, MD 20814
Phone: 301-657-0741
ploneil@lerchearly.com
Attorney for Applicant/Intervenor

LIBER 4016 FOLIO 244

69223-S (hr) THIS CORPORATE DEED *no stamp* *no consideration* 271.00
Made this 6th day of November, 1970 by and between

Washington Sanitarium and Hospital, Incorporated, formerly Washington (D. C.) Sanitarium Association which changed its name by certificate filed in the office of the Superintendent of Corporations for the District of Columbia on December 7, 1964, a District of Columbia Corporation

party of the first part, and

Washington Sanitarium and Hospital, Incorporated, a Maryland Corporation

party of the second part:

WITNESSETH, that in consideration of the sum of Ten Dollars and other good and valuable considerations the said party of the first part does grant and convey unto the party of the second part in fee simple, all that property situate in Montgomery County, State of Maryland, described as:

BEGINNING at a concrete monument hereby planted at the southeast corner of Albemarle and Maplewood Avenues and running thence with the southeast line of Maplewood Avenue (40 feet wide)

- (1) N 67° 00' 15" E 351.59 feet to a concrete monument hereby planted; thence with the dividing line between the Washington Sanitarium and Hospital and the Columbia Union College for the next following three lines
- (2) S 28° 58' 30" E 826.75 feet to a spike in the macadam driveway;
- (3) N 42° 11' 30" E 79.21 feet to a concrete monument;
- (4) S 29° 26' 45" E 579.27 feet with the centerline of the driveway to a spike set in the macadam;
- (5) thence with the northwest line of Carroll Avenue along the arc of a curve to the left having a radius of 290.18 feet for an arc distance of 141.25 feet (chord bearing S 43° 10' 32" W for 139.86 feet) to an iron pipe;
- (6) S 29° 13' 50" W 75.49 feet to an iron pipe set on the northwest line of Carroll Avenue where the same intersects the taking line of Sligo Creek Parkway; thence with the next seven lines of the said Parkway;
- (7) N 79° 21' 08" W 213.22 feet to a concrete monument designated MNCP&PC #99;
- (8) thence along the arc of a curve to the left having a radius of 790.95 feet for an arc distance of 201.51 feet (chord bearing N 59° 19' 55" W 200.97 feet) to a concrete monument designated MNCP&PC #100;
- (9) N 66° 37' 50" W 208.89 feet to a concrete monument designated MNCP&PC #101;
- (10) thence along the arc of a curve to the right having a radius of 195.97 feet for an arc distance of 177.15 feet (chord bearing N 40° 44' 00" W 171.18 feet) to a point where formerly stood a concrete monument designated MNCP&PC #102;
- (11) N 14° 50' 10" W 120.91 feet to a concrete monument designated MNCP&PC #103;
- (12) thence along the arc of a curve to the left having a radius of 611.07 feet for an arc distance of 201.45 feet (chord bearing N 24° 16' 50" W 200.54 feet) to a point where formerly stood a concrete monument designated MNCP&PC #104;
- (13) N 33° 43' 30" W 299.27 feet to a concrete monument designated MNCP&PC #105; thence with the west line of Albemarle Avenue here 50 feet wide;

CLERK'S OFFICE
MONTG. CO., MD.

1970 NOV -9 PM 2:51
LAW OFFICES CONROY & WILLIAMS 1100 SPRING STREET
BALTIMORE, MARYLAND 21201

NOV-9-70 PAID 5 76 1 CLK GJM.C. DEB-ACK 8:00

LIBER 4016 FOLIO 245

(14) N 6° 54' 10" E 298.62 feet to the point of beginning and containing 16.1762 acres of land

BEING SUBJECT TO the rights-of-land granted by the General Conference Corporation of Seventh Day Adventists to the Maryland-National Capital Park and Planning Commission as the last parcel described in a deed dated July 18, 1933 and recorded in Liber 558 at Folio 272 and beginning for that part of the rights-of-land affecting the 16.1762 acre parcel previously described at the concrete monument designated MNCP&PC #105; and running thence with the 8th through the 14th line in the rights-of-land grant

- (8) S 83° 05' 05" E 131.78 feet;
- (9) S 33° 43' 30" E 120.91 feet;
- (10) thence with a curve to the right having a radius of 711.07 feet for an arc distance of 234.42 feet (chord S 24° 16' 50" E 233.36 feet);
- (11) S 14° 50' 10" E 120.91 feet;
- (12) thence with a curve to the left having a radius of 95.97 feet for an arc distance of 86.76 feet (chord S 40° 44' 00" E 83.83 feet);
- (13) S 66° 37' 50" E 208.89 feet;
- (14) thence with a curve to the right having a radius of 890.95 feet for an arc distance of 226.99 feet (chord S 59° 19' 55" E 226.37 feet);
- (15) S 52° 02' 00" E 193.59 feet, passing over the intersection with the 6th line 16.1762 acre tract described above at 189.11 feet; thence N 79° 21' 08" W 4.67 feet to the end of the 6th line of the 16.1762 acre tract and continuing thence with the 7th through the 14th lines thereof to the point of beginning and containing 2.8629 acres as rights-of-land.

TOGETHER with the building and improvements thereupon erected, made or being; and all and every, the rights, alleys, ways, waters, privileges, appurtenances and advantages to the same belonging or in anywise appertaining.

AND the said party of the first part covenants that it will warrant specially the property hereby conveyed and will execute such further assurances of said land as may be requisite.

IN WITNESS WHEREOF, the said grantor has caused its corporate seal to be hereto affixed and these presents to be executed in its corporate name by Cree Sandefur its President, and attested by John D. Ruffcorn its Secretary, as of the day and year first above written, in pursuance of resolutions duly adopted for that purpose by its Stockholders and Board of Directors respectively. Constituency and Board of Trustees.

Washington Sanitarium and Hospital, Incorporated

Attest: *John D. Ruffcorn*
John D. Ruffcorn, Secretary

By: *Cree Sandefur*
Cree Sandefur, President

State of Maryland)
County of Montgomery) to wit:

On this 6th day of November, 1970 before the undersigned officer, personally appeared Cree Sandefur who acknowledged himself to be the President of Washington Sanitarium and Hospital, Incorporated, a corporation, and that he, as such officer being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of said corporation by himself as such officer.

In witness whereof I hereunto set my hand and official seal.

William A. Bryan Jr.

Notary Public

WILLIAM A. BRYAN JR.

My commission expires: July 1, 1974

THIS IS TO CERTIFY that the within instrument has been prepared under the supervision of George C. Haider, Jr., an attorney duly admitted to practice before the Court of Appeals of Maryland.

George C. Haider, Jr.

NOV - 9 1970 13-25-56306

All Taxes on assessment levied by the
Collector of Taxes for Montgomery County
Maryland by 11-9-70 have been paid. Dept. of
Finance, Montgomery County, Md.
This is to certify for the purpose of permitting
recording and is not evidence against the
taxation even for prior periods, nor does it
warrant satisfaction of outstanding tax bills.

Wm. G. Gorman
TRANSFER TO GOVERNMENTAL, RELIGIOUS,
OR CHARITABLE ORGANIZATION-*WASH*
TRANSFER WITHOUT CONSIDERATION
W

HEREBY CERTIFY THIS PROPERTY HAS BEEN DULY
TRANSFERRED ON THE MONTGOMERY COUNTY
ASSESSMENT BY
William G. Gorman
TRANSFER CLERK, DIVISION OF ASSESSMENTS
52912

LIBER 4016 FOLIO 246

CORPORATE DEED
Washington Sanitarium and Hospital, Incorporated (formerly Washington (D.C.) Sanitarium Association) ✓ a D. C. Corporation TO Washington Sanitarium and Hospital, Incorporated a Maryland Corporation
RECEIVED THIS 9 th DAY OF NOV. 1970 AT 2:51 O'CLOCK P.M. TO BE RECORDED, AND SAID DAY WAS RECORDED IN LIBER H.A.S. NO. 4212 FOLIO 246 ONE OF THE LAND RECORDS OF MONTGOMERY COUNTY, MD. AND FORWARDED TO <i>Wm. G. Gorman</i> Clerk
LAW OFFICES CONROY AND WILLIAMS 3420 HAMILTON STREET HYATTSVILLE, MARYLAND 20782 277-8200

Mail to *GEANTREE*

7600 CARROLL AVENUE
TAKOMA PARK, MD 20912

[Home Table of Contents](#)**§ 14-108. Quieting title to property**

West's Annotated Code of Maryland

Real Property

Effective: October 1, 2016

West's Annotated Code of Maryland
 Real Property (Refs & Annos)
 Title 14. Miscellaneous Rules (Refs & Annos)
 Subtitle 1. Miscellaneous Rules

Effective: October 1, 2016

MD Code, Real Property, § 14-108

§ 14-108. Quieting title to property[Currentness](#)

(a) Any person in actual peaceable possession of property, or, if the property is vacant and unoccupied, in constructive and peaceable possession of it, either under color of title or claim of right by reason of the person or the person's predecessor's adverse possession for the statutory period, when the person's title to the property is denied or disputed, or when any other person claims, of record or otherwise to own the property, or any part of it, or to hold any lien encumbrance on it, regardless of whether or not the hostile outstanding claim is being actively asserted, and if an action at law or proceeding in equity is not pending to enforce or test the validity of the title, lien, encumbrance, or other adverse claim, the person may maintain a suit in accordance with Subtitle 6 of this title in the circuit court for the county where the property or any part of the property is located to quiet or remove any cloud from the title, or determine any adverse claim.

(b) The proceeding shall be deemed in rem or quasi in rem so long as the only relief sought is a decree that the plaintiff has absolute ownership and the right of disposition of the property, and an injunction against the assertion by the person named as the party defendant, of the person's claim by any action at law or otherwise. Any person who appears of record, or claims to have a hostile outstanding right, shall be made a defendant in the proceedings.

Credits

Added by Acts 1974, c. 12, § 2, eff. July 1, 1974. Amended by Acts 2016, c. 395, § 1, eff. Oct. 1, 2016; Acts 2016, c. 396, § 1, eff. Oct. 1, 2016.

Formerly Art. 21, § 14-108.

MD Code, Real Property, § 14-108, MD REAL PROP § 14-108

Current through all legislation from the 2025 Regular Session of the General Assembly. Some statute sections may be more current, see credits for details.

END OF DOCUMENT

[Home Table of Contents](#)§ 14-602. *Actions to quiet title*

West's Annotated Code of Maryland

Real Property

Effective: October 1, 2016

West's Annotated Code of Maryland
Real Property (Refs & Annos)
Title 14. Miscellaneous Rules (Refs & Annos)
Subtitle 6. Actions to Quiet Title (Refs & Annos)

Effective: October 1, 2016

MD Code, Real Property, § 14-602

§ 14-602. *Actions to quiet title*[Currentness](#)

An action may be brought under this subtitle to establish title against adverse claims to property, including adverse claims described in § 14-108 of this title.

Credits

Added by Acts 2016, c. 395, § 1, eff. Oct. 1, 2016; Acts 2016, c. 396, § 1, eff. Oct. 1, 2016.

MD Code, Real Property, § 14-602, MD REAL PROP § 14-602

Current through all legislation from the 2025 Regular Session of the General Assembly. Some statute sections may be more current, see credits for details.

END OF DOCUMENT

[Home Table of Contents](#)§ 14-606. *Verification and contents of complaint*

West's Annotated Code of Maryland

Real Property

Effective: October 1, 2016

West's Annotated Code of Maryland
Real Property (Refs & Annos)
Title 14. Miscellaneous Rules (Refs & Annos)
Subtitle 6. Actions to Quiet Title (Refs & Annos)

Effective: October 1, 2016

MD Code, Real Property, § 14-606

§ 14-606. Verification and contents of complaint[Currentness](#)

A complaint under this subtitle shall be verified and shall include:

- (1) A description of the property that is the subject of the action, including both its legal description and its street address or common designation, if any;
- (2)(i) The title of the plaintiff as to which a determination is sought and the basis of the title; and
 - (ii) If the title is based on adverse possession, the specific facts constituting the adverse possession;
- (3) The adverse claims to the title of the plaintiff against which a determination is sought; and
- (4) A prayer for a determination of the title of the plaintiff against the adverse claims.

Credits

Added by Acts 2016, c. 395, § 1, eff. Oct. 1, 2016; Acts 2016, c. 396, § 1, eff. Oct. 1, 2016.

MD Code, Real Property, § 14-606, MD REAL PROP § 14-606

Current through all legislation from the 2025 Regular Session of the General Assembly. Some statute sections may be more current, see credits for details.

END OF DOCUMENT

[Home Table of Contents](#)§ 14-607. *Verification and contents of answer*

West's Annotated Code of Maryland

Real Property

Effective: October 1, 2024

West's Annotated Code of Maryland
Real Property (Refs & Annos)
Title 14. Miscellaneous Rules (Refs & Annos)
Subtitle 6. Actions to Quiet Title (Refs & Annos)

Effective: October 1, 2024

MD Code, Real Property, § 14-607

§ 14-607. Verification and contents of answerCurrentness

(a) An answer to a complaint under this subtitle shall be verified and shall set forth:

- (1) Any claim the defendant has to the property that is the subject of the action;
- (2) Any facts tending to controvert any material allegations of the complaint that the defendant does not wish to be taken as true; and
- (3) A statement of any new matter constituting a defense.

(b) If the defendant disclaims any interest in the title of the property in the answer or allows judgment to be taken without answer, the plaintiff may not recover costs.

Credits

Added by Acts 2016, c. 395, § 1, eff. Oct. 1, 2016; Acts 2016, c. 396, § 1, eff. Oct. 1, 2016. Amended by Acts 2024, c. 369, § 1, eff. Oct. 1, 2024.

MD Code, Real Property, § 14-607, MD REAL PROP § 14-607

Current through all legislation from the 2025 Regular Session of the General Assembly. Some statute sections may be more current, see credits for details.

END OF DOCUMENT

[Home Table of Contents](#)

§ 14-608. Defendants in an action; validity of adverse claim

West's Annotated Code of Maryland

Real Property

Effective: October 1, 2016

West's Annotated Code of Maryland

Real Property (Refs & Annos)

Title 14. Miscellaneous Rules (Refs & Annos)

Subtitle 6. Actions to Quiet Title (Refs & Annos)

Effective: October 1, 2016

MD Code, Real Property, § 14-608

§ 14-608. Defendants in an action; validity of adverse claimCurrentness

(a) The plaintiff shall name as defendants in an action under this subtitle the persons having adverse claims to the title of the plaintiff that are of record or known to the plaintiff or reasonably apparent from an inspection of the property against which a determination is sought.

(b) If the plaintiff admits the validity of any adverse claim, the plaintiff shall state the admission in the complaint.

Credits

Added by Acts 2016, c. 395, § 1, eff. Oct. 1, 2016; Acts 2016, c. 396, § 1, eff. Oct. 1, 2016.

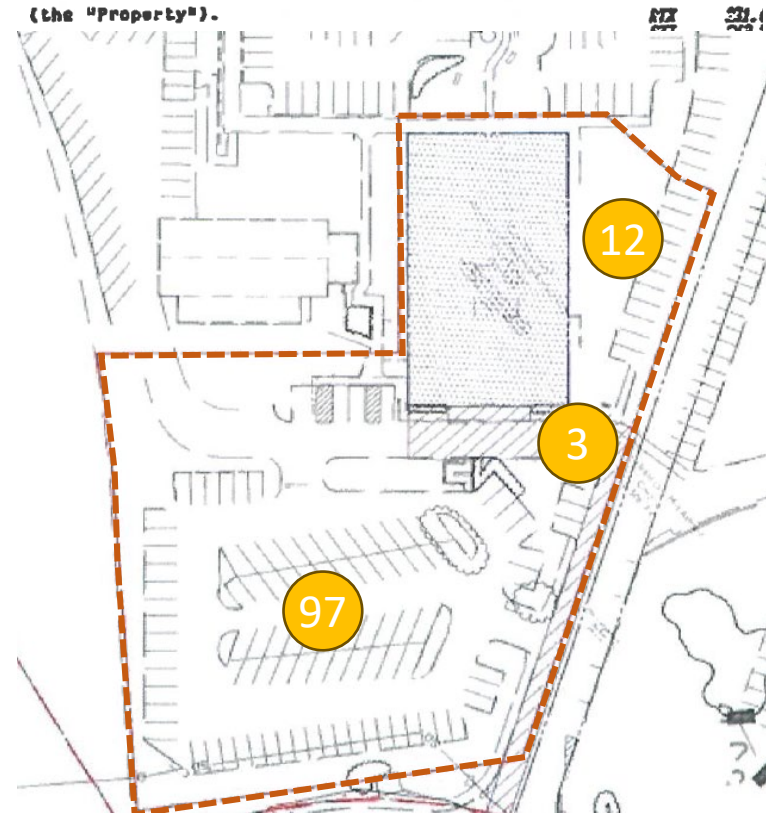
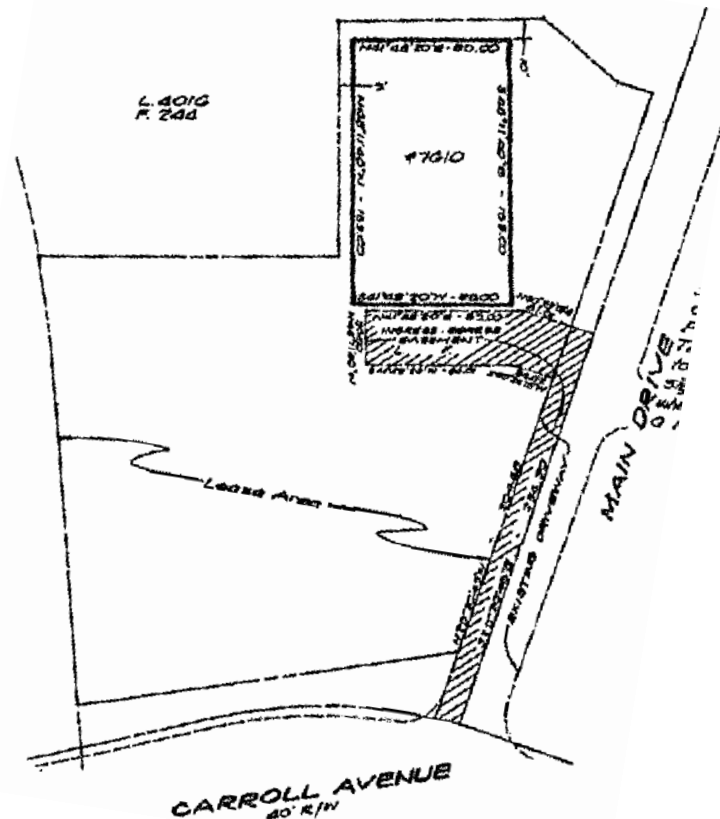
MD Code, Real Property, § 14-608, MD REAL PROP § 14-608

Current through all legislation from the 2025 Regular Session of the General Assembly. Some statute sections may be more current, see credits for details.

END OF DOCUMENT

Parking Lease

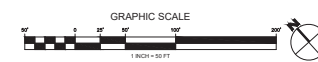
WITNESSETH, that the Lessor, for and in consideration of the covenants, conditions, and agreements herein contained, and on the part of the Lessee to be paid, kept and performed, does hereby lease to the Lessee, and the Lessee does hereby lease from the Lessor, certain premises as outlined in red on the plat attached hereto as Exhibit A, consisting of 69,618 square feet of parking area as further described in Exhibit B (the "Property").





- APPROX. 3409 FEET OF FENCING
- APPROX. 42 PULL POSTS
- (6) - 10 FT GATES WITH DROP-ROD CHAIN AND PAD LOCK

1. REFER TO MSHA STANDARD NO. MD-690.02 AND MD-690.01 FOR FENCE DETAILS.
2. FENCE SHALL BE 6' NORMAL HEIGHT.
3. ALL FENCES ARE TO HAVE TOP AND BOTTOM TENSION WIRES.
4. UNLESS OTHERWISE NOTED ALL GATES ARE TO HAVE 30" OPENINGS WITH 2 - 10" GATE PANELS WITH DIAPHRAGM & CHAIN WITH PAD LOCK.
5. UNLESS OTHERWISE NOTED A PULL POST SHALL BE ADDED AT ALL HORIZONTAL BENDS GREATER THAN 15 DEGREES, ABRUPT GRADE CHANGES AND / OR SPACED A MAXIMUM OF 200'.
6. ALL PAD LOCKS ARE TO BE KEPT THE SAME.
7. THE CONTRACTOR MAY MAKE MINOR ADJUSTMENT TO THE FENCE ALIGNMENT IN ORDER TO AVOID UTILITY LINES AND / OR EXISTING TREES.
8. FENCE IS TO BE INSTALLED BEHIND THE CURB AND/OR SIDEWALK UNLESS OTHERWISE NOTED.



0.15 (0.01)

Washington Adventist Hospital Demolition

MOB – On Site Parking Counts
September 29, 2025

On Site Parking Counts

Observed parking count on Tuesday, September 29, 2025, 9:20 AM

Location	9/29	9/16
Road	17	25
Lower Parking Lot	18	18
Former Physician Lot	37	26
TOTAL	72	69

On Site Parking Counts

Road
17



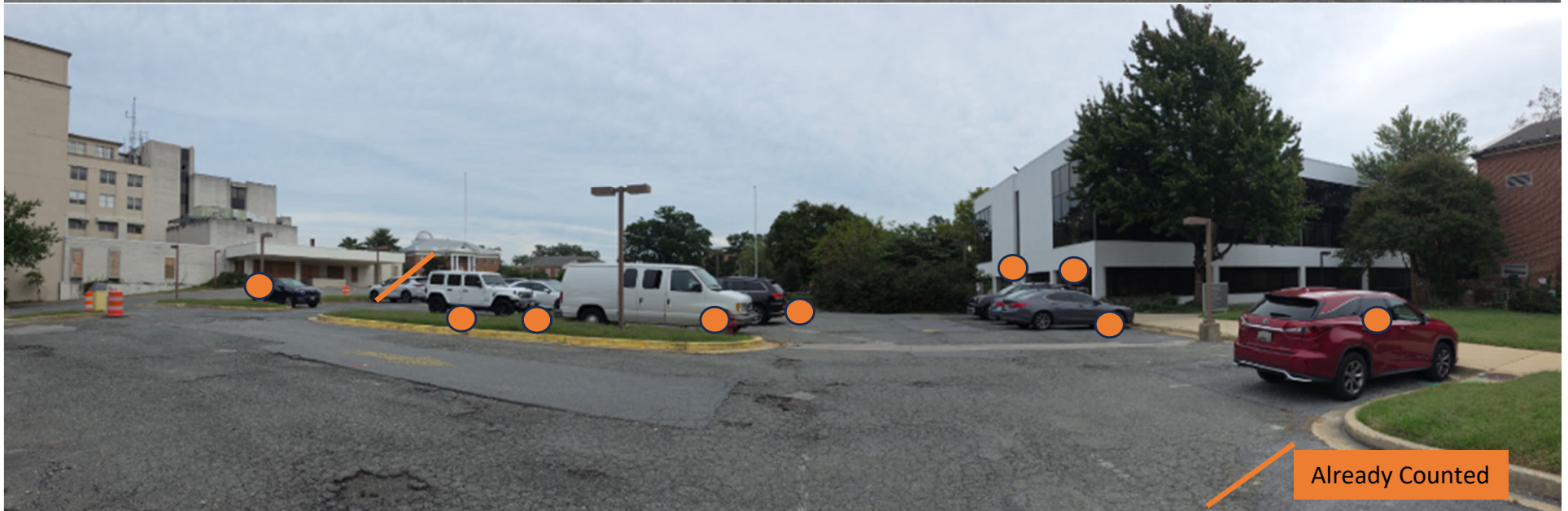
On Site Parking Counts

Lower Parking Lot
18



On Site Parking Counts

Former Physician Lot
24



On Site Parking Counts

Former Physician Lot
13



Additional AHC Parking Counts

AM

	Date	Date	Time	Total
1	Monday	9/22	9:00	74
2	Monday	9/22	9:24	74
3	Wednesday	9/24	9:00	60
4	Friday	9/26	9:00	76
5	Monday	9/29	9:00	50
6	Monday	9/29	9:30	72
7	Wednesday	10/1	9:00	89
8	Friday	10/3	9:00	64
9	Monday	10/6	9:00	67
10	Wednesday	10/8	9:00	61
11	Thursday	10/9	9:00	51
12	Friday	10/10	9:00	53
13	Monday	10/13	9:00	73
14	Tuesday	10/14	9:00	57
15	Thursday	10/16	9:00	57
16	Friday	10/17	9:00	56
17	Saturday	10/18	9:00	43

AM

Average	63
Highest Count	89
Lowest Count	43

Overall

Average	71
Highest Count	121
Lowest Count	26

Mid

	Date	Date	Time	Total
1	Monday	9/22	12:00	112
2	Wednesday	9/24	12:00	56
3	Friday	9/26	12:00	58
4	Monday	9/29	12:00	77
5	Wednesday	10/1	12:00	108
6	Friday	10/3	12:00	87
7	Tuesday	10/7	12:00	74
8	Wednesday	10/8	12:00	119
9	Thursday	10/9	12:00	67
10	Friday	10/10	12:00	79
11	Monday	10/13	12:00	73
12	Tuesday	10/14	12:00	79
13	Wednesday	10/15	12:00	121
14	Thursday	10/16	12:00	78
15	Friday	10/17	12:00	77
16	Saturday	10/18	12:00	37

Mid-Day

Average	81
Highest Count	121
Lowest Count	37

PM

	Date	Date	Time	Total
1	Monday	9/22	15:00	49
2	Wednesday	9/24	15:00	64
3	Friday	9/26	15:00	44
4	Monday	9/29	15:00	33
5	Wednesday	10/1	15:00	92
6	Monday	10/6	14:30	94
7	Tuesday	10/7	14:00	88
8	Wednesday	10/8	14:00	69
9	Friday	10/10	14:00	79
10	Tuesday	10/14	14:00	78
11	Wednesday	10/15	14:00	99
12	Thursday	10/16	14:00	79
13	Friday	10/17	14:00	85
14	Saturday	10/18	14:00	26

PM

Average	70
Highest Count	99
Lowest Count	26

ANNE (NANCY) M. RANDALL

PROFILE: Ms. Randall has over 45 years of experience in the traffic and transportation planning fields for both private and public sector clients. This experience includes conducting and overseeing the preparation of traffic impact studies, corridor studies, signal warrant analyses, Traffic Demand Management programs, site circulation reviews, parking policy and needs studies, and feasibility analyses.

EXPERIENCE: **Traffic Impact Studies.** Conducted numerous traffic impact studies for residential, retail, commercial, industrial, institutional, and mixed-use properties in Maryland, Virginia, and Washington D.C. This includes analysis of data, preparation of reports, and expert testimony in support of rezoning, special exception/use permits, and site plan/subdivision plat approvals.

Large Scale Mixed-Use & Multi-Modal Developments. Conducted multi-modal transportation studies for a number of large residential, office, and retail projects, including: North Bethesda Town Center (White Flint Metro Station), White Flint Mall, and Mid-Pike Plaza in White Flint, Maryland; Twinbrook Commons and Twinbrook Station at the Twinbrook Metro Station in Rockville, Maryland; Geico Headquarters in Friendship Heights, Maryland; Bethesda Theater in Bethesda, Maryland; Riverdale Park Station-Cafritz, Riverdale Park Maryland; West Hyattsville Metro Station, Largo Town Center at the Largo Metro Station, Town Center at Camp Springs at the Branch Avenue Metro Station, and Fairwood in Prince George's County, Maryland; and Russett Center, Parole Town Center and Anne Arundel Medical Center in Anne Arundel County, Maryland.

Transportation Master Plans and Corridor Studies.

Preparation of Transportation Master Plans for the City of Annapolis and Anne Arundel County Maryland. Preparation of the transportation elements for several Sector Plan and Sectional Map Amendment Plans for several sub-region zones within Prince George's County Maryland, including Sub-Region1 Route 1 Corridor Master Plan, Bladensburg Master Plan, Branch Avenue Master Plan and Port Towns Master Plan. Provided the analysis and recommendations for the Transportation Master Plan for Fort Meade, Maryland. Conducted corridor studies in the city of Annapolis, Prince George's County, Historic District of the City of Fairfax, Virginia, and MD Route 32/NSA for the MD State Highway Administration.

Feasibility Analysis. Prepared site assessments for projects in Montgomery, Anne Arundel, Prince George's, Howard, Charles, Calvert, Kent, St. Mary's, Allegany, Frederick, Carroll, Talbot and Baltimore Counties, Maryland and the City of Alexandria and Fairfax County, Virginia.

Parking Studies. Conducted parking policy, size requirements, needs, feasibility, and shared-use studies for private developers and for public agencies, including the City of Annapolis, Anne Arundel County, Anne Arundel Medical Center, Centex, CentreMark Properties, Lerner Enterprises, LCOR, Federal Realty Investment Trust and Archstone Smith.

Expert Witness Testimony. Qualified as an expert witness in Federal District Court and Circuit Court in Anne Arundel County in Maryland; Qualified in Maryland before District Council, MNCPPC Planning Board and Zoning Hearing Officer in both Montgomery County and Prince Georges County; Planning Board and City Council in City of Rockville: Hearing Officer/Zoning Hearing Commissioner in Baltimore County; Zoning Hearing Officer and Board of Appeals in Anne Arundel County: Planning Board, Board of Appeals and City Council in City of Annapolis; Board of Appeals, County Commissioner and Planning Commission in St. Mary's and Calvert Counties; City Council in the City of Greenbelt;

Planning Board in the City of Laurel; Planning Advisory Board, and the City Council of Bowie; and the Planning Commission in Carroll County.

Special Event Transportation Planning. Designed and coordinated traffic operations for special events in the City of Annapolis, Maryland, including U.S. Boat Shows, 1984 Summer Olympic Trials and NATO conferences.

EDUCATION: Bachelor of Arts, Behavioral and Social Sciences, University of Maryland, College Park, 1975.

AFFILIATIONS: Member of the Institute of Transportation Engineers
Professional Transportation Planner (PTP)
American Planning Association
Member of the American Institute of Certified Planners (AICP)

EMPLOYMENT HISTORY:

1995 – 2025 **Wells + Associates, Inc.**
McLean, Virginia
Principal Associate
Branch Manager of Wells & Associates, Inc. Silver Spring Office, responsible for business development, management of professional, technical, and clerical staff, project management for transportation planning studies, including technical analysis, report preparation, public presentation, and expert testimony.

1989-1995 **The Traffic Group, Inc.**
Towson, Maryland
Senior Associate
Responsible for transportation planning studies, project management, technical analysis, management of technical staff, business development, documentation, and expert testimony.

- 1986-1989** **Greenhorn & O'Mara, Inc.**
Greenbelt, Maryland
Responsibilities included transportation planning studies, technical analysis, documentation, business development, administration, and management of technical staff, and expert testimony.
- 1981-1986** **City of Annapolis**
Department of Public Works
Annapolis, Maryland
Engineering Analyst
Provided transportation planning and traffic engineering services for the City of Annapolis, including review of subdivisions, zoning, and development plans for compliance with the City Code, review of traffic impact studies, special event planning, technical review of transportation plans, city wide traffic control design, and implementation.
- 1979-1980** **Development Facilitators, Inc.**
Severna Park, Maryland
Engineering Analyst
Responsible for business development, management of technical staff, technical analysis, and preparation of traffic engineering reports and plans.
- 1976-1979** **Anne Arundel County**
Department of Public Works
Traffic Engineering Division
Traffic Analyst
Responsible for review of subdivision zoning and development plans for compliance with County Code requirements, parking lot layout, street design, and street lighting. Review of impact studies submitted for subdivision and rezoning applications. Prepared and drafted portions of the 1978 transportation text of the Adequate Public Facilities Ordinance for Anne Arundel County, Maryland.



William Zeid, PE

Traffic and Transportation Practice Leader

Will is a Traffic and Transportation Practice Leader with over 16 years of engineering experience in the DMV and throughout Maryland. Will's practice focuses in traffic, parking and transportation engineering and planning in the DC, Maryland and Virginia markets providing support for designing and entitling private and public development projects. He is responsible for managing projects in Washington, DC, Maryland, and Virginia. Will is actively involved in helping shape transportation policy within Maryland.

Will is a qualified expert recognized by the DC Board of Zoning Adjustment, the DC Zoning Commission, Montgomery County, City of Rockville, and numerous other jurisdictions in Maryland and Virginia. He has also been recognized as an expert witness providing testimony in civil court proceedings in the Loudoun County Circuit Court.

Will currently serves on the Board of Directors as President Elect for the Maryland Society of Professional Engineers and is actively involved in legislative and policy efforts through the Legislative Committee.

He has experience with all types of projects including office to residential conversions, educational institutions, mixed-use developments, commercial, religious institutions, retail shopping centers, office developments, residential communities, automotive service uses and government facilities.

INDUSTRY WORK EXPERIENCE

Kimley-Horn and Associates – April 2024 to Present

- *Leading a practice providing transportation engineering services in the Washington metropolitan area and throughout Maryland through managing the transportation related aspects of public and private project entitlements and other transportation consulting services.*

Gorove Slade (DC/MD) – July 2021 to April 2024

- *Continued to provide transportation engineering services in the Washington metropolitan area and throughout Maryland through managing the transportation related aspects of public and private project entitlements and other transportation consulting services.*

Wells + Associates (Tysons Corner) - April 2011 to June 2021

- *Provided transportation engineering services in the Washington metropolitan area and throughout Maryland through the preparation of analyses, reports, in-depth studies, presentations and coordinating with clients and reviewing agencies to obtain transportation related approvals for development projects.*

EDUCATION

- Bachelor of Science, Civil Engineering, University of Idaho (2004-2009)

PROFESSIONAL REGISTRATIONS

- Maryland: No. 49415
- District of Columbia: No. PE921523
- Delaware

PROFESSIONAL ASSOCIATIONS

- Maryland Society of Professional Board of Directors
- National Association of Industrial and Office Properties (NAIOP)
- Urban Land Institute (ULI)

EXPERIENCE

- 16 years total
- <1 year with Kimley-Horn
- 4 years with Gorove Slade
- 10 years with Wells + Associates
- 2 years project engineering

LOCATION

- Bethesda, MD

MASTER PLANNING AND FACILITIES DESIGN

Experience preparing designs and recommendations for internal pedestrian, bicycle and vehicular circulation systems, queue storage for pick-up/drop-off systems for schools and daycares, loading facilities layouts and site access connections to the public street network.

QUEUING ANALYSIS

Experience preparing queuing analyses for roadways, intersections, drive-thru lanes, and pick-up/drop-off systems using SHA methodology, Macroscopic Traffic Analysis Software, Microscopic Traffic Simulation Software and via statistical queuing models.

TRAFFIC IMPACT ANALYSIS

Experience preparing numerous traffic impact studies for residential, commercial, institutional, and mixed-use projects in the Washington metropolitan area and throughout the state of Maryland. This includes preparation of analyses, reports, and presentations in support of rezoning, site plan, and subdivision approvals.

ROADWAY CAPACITY ANALYSIS

Experience conducting capacity analyses using Highway Capacity Manual and Critical Lane Volume methodologies. This includes analysis of intersections, ramps, and weaving sections using Synchro, Highway Capacity Software (HCS) and SIDRA. Has performed microscopic simulation studies and presentations using the SimTraffic software.

TRAFFIC FORECASTING

Experience estimating the number of vehicular, pedestrian and bicycle trips generated by proposed developments based on data provided in the Institute on Transportation Engineers' Trip Generation as well as other industry publications. Based on these estimates, forecasted future traffic volumes on roadway networks. Determined trip reductions achievable due to proximity to transit and the implementation of a transportation demand management (TDM) program.

PARKING ANALYSIS

Experience conducting parking analyses of various developments including retail, mixed-use, and institutional clients. Evaluated existing and forecasted future parking demands. Prepared shared parking studies as well as parking reduction studies.

SIGNAL WARRANT ANALYSIS

Experience conducting numerous studies to determine the existing and future need for signalization at specific intersections, according to the guidelines of the Manual on Uniform Traffic Control Devices. This includes determining whether a signal may be warranted due to vehicular traffic, crash incidence history, proximity to schools or other specific elements and the presence of high pedestrian volumes.