BEFORE THE OFFICE OF ZONING AND ADMINISTRATIVE HEARINGS OF MONTGOMERY COUNTY, MARYLAND

IN THE MATTER OF THE APPLICATION: OF 1910 UNIVERSITY, LLC FOR A CONDITIONAL USE FOR HOUSING FOR INDEPENDENT SENIORS: Cond. Use Application No. CU 22-04

APPLICANT'S PRE-HEARING SUBMISSION

The Applicant in the above-referenced case, 1910 UNIVERSITY, LLC ("1910 UNIVERSITY"), in accordance with Rule 3.4 of the Rules of Procedure for the processing of a conditional use application, submits the following information:

A. Statement of the Grounds for Approval of the Application

As part of its application materials, as amended, the Applicant has submitted a Statement of Justification, and will be submitting an Amended Statement of Justification, setting forth the grounds for approval of the application. The Applicant incorporates that document herein by reference thereto.

At the public hearing, the Applicant will present testimony and evidence demonstrating how the proposed use will satisfy the following requirements for the proposed use:

1. That the application satisfies the necessary findings for the granting of a conditional use set forth in Section 59.7.3.1.E of the Zoning Ordinance.

2. That the application satisfies the use standards set forth in Section 59.3.3.2.C.

3. The application satisfies the general development requirements of Section 59.6 of the Zoning Ordinance.

4. That the proposed use is in substantial conformance with the area Master Plan.
5. That the surrounding transportation network is adequate to support this use and other public facilities are also available and adequate to service the proposed use.

B. Copies of Reports

There is a single written report on which the Applicant will rely, a Traffic Statement, dated May 14, 2021 which has been entered into the record, with the original application and is incorporated herein.

C. Names of Expert Witnesses and a Summary of their Testimony

1. Michael Goodman, VIKA

Mr. Goodman will qualify as an expert in civil engineering and site design. He will testify as to how all critical issues of engineering significance, such as stormwater management, utility services and conformance with the dimensional standards contained in the Zoning Ordinance, will be satisfied by the Applicant’s proposal. Mr. Goodman, as the lead professional with VIKA working on this application, will testify how all elements of the application, such as forest conservation, have been prepared under his supervision and comply with all applicable regulations and requirements.

2. Scott Matties, Wiencek Architects

Mr. Matties will qualify as an expert in the field of architecture. He will testify how the proposed senior housing facility has been designed to address the context of its setting as well as the needs of its prospective residents. Mr. Matties will describe the details of the design of the building of the Zoning Ordinance and its compatibility with its surroundings.

3. Temitayo Fasosi, Wiencek Architects

Ms. Fasusi has been actively involved in the design of the proposed building and may be qualified to testify as an expert in the field of architecture if needed to respond to specific issues.
4. **Nicole White, Symmetra Design**

Ms. White will qualify as an expert in traffic engineering and transportation planning. She will testify that the use will operate with no adverse effect on the surrounding transportation network and will, in fact, generate only enough traffic to warrant submission of a Traffic Statement and not a Traffic Study.

Resumes for all of the listed expert witnesses are attached.

**D. Other Witnesses**

1. **Elizabeth Everhart, Mission First Housing**

Ms. Everhart will testify about the Applicant and its mission to promote affordable housing for seniors and will address all aspects of the operations of the proposed residential facility.

2. **John Bleiweis, or designee, Har Tzeon Synagogue**

Mr. Bleiweis, or his designee, will explain how 1910 University’s proposal facilitates the Synagogue’s plans to remodel its house of worship and how the operation of the proposed independent senior housing facility is complimentary with the Synagogue’s plans and needs.

**E. Estimated Time for Presentation**

The Applicant estimates that it will take four (4) hours to present its case.
Respectfully submitted,

MILLER, MILLER & CANBY

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Rockville, MD 20850
(301) 762.5212
jskline@mmcanby.com
Counsel for 1910 University, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this \textbf{26}^{th} day of August, 2022, a copy of the foregoing Applicant’s Pre-Hearing Statement was mailed, first class, postage prepaid, to:

Elsabett Tesfaye
Planner Coordinator
MNCPPC
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Jody S. Kline, Esq.
Michael Goodman, P.E.

Vice President

Mr. Goodman has over two decades of experience in the planning and development of civil engineering projects. His areas of expertise covers many aspects of land development civil engineering including: utility and water resource plans for urban re-development/in-fill, commercial, and residential properties, construction documents, and entitlement documents. Mr. Goodman has extensive experience in several local jurisdictions including Montgomery County, City of Rockville, City of Gaithersburg, and Prince George’s County.

Areas of Professional Competence:
- Project management of multi-disciplined design teams
- Land development feasibility studies
- Post construction services
- Roadway drainage and utility design
- Maintenance of Traffic (MOT) Plans
- Easement documents and site access analysis

Professional Experience:
- East Norbeck Park, Norbeck, MD
- Greenbrier Local Park, Potomac, MD
- Crown Farm, Gaithersburg, MD
- Fairfield at West Deer Park, Gaithersburg, MD
- Crossings at Olde Towne, Gaithersburg, MD
- Silverstone - Harborchase, Rockville, MD
- Potomac Woods, Rockville, MD
- 50 Monroe Street, Rockville, MD
- North Bethesda Center, Parcel G, Rockville, MD
- Shady Grove Station, Rockville, MD
- 8300 Wisconsin, Bethesda, MD
- 7900 Wisconsin, Bethesda, MD
- 7001 Arlington Road, Bethesda, MD
- Caroline Freeland Park, Bethesda, MD
- Montgomery Row, Rockville, MD
- Grosvenor Strathmore, North Bethesda, MD
- Mazza Grand Marc, College Park, MD
- ezStorage, College Park, MD
- East Pines, East Riverdale, MD
- 700 Quince Orchard, Gaithersburg, MD
- The Chase at Quince Orchard, Gaithersburg, MD

Professional Degrees and Registrations:
- Bachelor of Science, Civil Engineering, Pennsylvania State University
- Maryland, Professional Engineer, #27721, 2002
Scott Matties

AIA LEED-AP
Executive Vice President + Studio Director

Experience

Scott Matties holds a Master of Architecture from the University of Michigan and has more than 28 years of experience in architectural design and master planning for award-winning institutional, academic, commercial, and residential projects. His career has encompassed all aspects of residential design including single-family additions, renovations, new homes, multi-family apartments and condominiums, both market rate and affordable, and mixed-use, mixed-income communities. Continuing his vested interest in the education of communities concerning architecture and planning.

Mr. Matties has led numerous community engagement meetings and presentations leading to approvals by jurisdictions throughout the Washington, DC Metropolitan area. He has extensive experience with community engagement and successfully managing projects with diverse stakeholder groups.

Mixed-Income Housing Experience:
- Mount Sterling Senior Housing, Sterling, Virginia - Affordable Housing
- 801 Rhode Island Ave NW, Washington, DC - Mixed-Income Housing
- Edgewood 5 Senior Housing, Washington, DC - Affordable Housing/Mixed-Use
- Spring Flats Senior Housing, Washington, DC - Affordable Housing
- Spring Flats Family Housing, Washington, DC - Mixed-Income Housing
- 125 35th Street Family Housing, Washington, DC - Affordable Housing

Master Planning Experience:
- Meadow Green Master Plan, Washington, DC
- Spring Road Master Plan, Washington, DC
- North Hill Master Plan, Fairfax County, VA
- Buckingham Center Mixed-Use Revitalization, Arlington, VA
- University Drive Mixed-Use Master Plan, Fairfax County, VA
Temitayo Fasusi

RA, NCARB
Project Architect

Experience

Ms. Fasusi is a registered Architect with over 8 years of experience in all phases of planning, production and construction management. Her experience includes new construction and renovation work on multifamily, hospitality, and offices spaces. Some of her recent projects include the following:

- **Milestone Senior, Gaithersburg, MD** - Project Manager for new construction, 111-unit senior LIHTC project. Responsible for test fit, design, and construction documents. Responsibilities included completing the construction documents and construction administration.

- **Lisner Senior, Washington, DC** - Project Architect for new construction, 93-unit senior LIHTC project. Responsible for test fit, design, and producing construction documents.

- **Tuscarora I & II, Leesburg, VA** - Project Architect for new construction, 180-unit mixed income, LIHTC community. Project includes underground parking garage. Responsibilities included producing the construction documents.

- **801 Rhode Island, Washington, DC** - Project Architect for new construction, 198-unit mixed income community.

- **Portals V, Washington, DC** - Staff Architect for new construction, 13 stories with 290 apartments and 75 condos project. Responsibilities included completing the construction documents and construction administration.

- **Cava Restaurants, Washington, DC** - Project Manager overseeing a team of architects, engineers, food service, lighting, permit expediter and signage consultants for multiple new restaurants.
Nicole A. White, P.E., PTOE  
Principal  
Symmetra Design

Ms. White has over 25 years of experience in transportation planning and traffic engineering projects. She brings extensive management skills and expertise ranging from intersection safety and operational studies to parking studies and Transportation Management Plans. Ms. White specializes in Traffic Impact Studies, master planning and transportation management for Federal Campuses, educational facilities and redevelopment studies.

She has significant experience coordinating with project stakeholders and local officials. She is a certified Charrette Planner through the National Charrette Institute. Ms. White has been accepted as an expert witness by the Circuit Court of Prince George’s County, Prince George’s County Planning Board, District of Columbia Zoning Commission, District of Columbia Board of Zoning Adjustment and Montgomery County Hearing Examiner.

Ms. White is an award recipient of the “Leadership and Excellence Award” from the Minority Enterprise Advocate Magazine and the “Top 100 Minority Business Enterprise Award” for minority and woman-owned businesses in the Mid-Atlantic region.

RELEVANT EXPERIENCE

Expert Testimony
Ms. White has provided expert testimony before the Court of Prince George’s County, Prince George’s County Planning Board, District of Columbia Zoning Commission, District of Columbia Board of Zoning Adjustment and Montgomery County Hearing Examiner associated with transportation planning and traffic engineering projects. Project experience includes:

- Audubon Naturalist Society – Chevy Chase, MD – Montgomery County Hearing Examiner
- Park Morton, Washington, DC – DC Zoning Commission
- West End Parcel Square 37, Washington, DC – DC Zoning Commission
- Washington Episcopal School, Bethesda, MD – Montgomery County Hearing Examiner
- Sycamore Hill, Mitchellville, MD – Prince George’s County Hearing Examiner
- University View, College Park, MD – Court of Prince George’s County

Traffic Impact Studies
Ms. White has directed a significant number of Traffic Impact Studies for various jurisdictions in the Baltimore-Washington Metropolitan area. Traffic studies have been prepared for various land-use types ranging from commercial and mixed-use to federal government and institutional. Studies have ranged in size and scope from 2 intersections to greater than 20 intersections. Analyses for traffic studies include the following methodology: Critical Lane Volume, Highway Capacity Manual, and SYNCHRO. Traffic Impact Studies also include assessment of pedestrian, bicycle, parking, transit and loading conditions. Project experience includes:

- Villas at Laurel, Laurel, MD
- Villages at Peppermill, Capitol Heights, MD
- West End Parcel Square 37, Washington, DC
- Coppin State University Science and Technology Center, Baltimore, MD
- Washington Episcopal School, Bethesda, MD
- McMillian Sand Filtration Site Redevelopment, Washington, DC
- A.V. Bryan Courthouse, Alexandria, VA
Accessibility & Mobility
Ms. White has significant experience developing solutions that improve accessibility and mobility in urban areas. Accessibility improvements include development of an enhanced transportation network with consideration for improved connections for vehicles, shorter walking distances for pedestrians, and recommendations for improved transit services. Ms. White has also developed a significant number of solutions that improve the quality of transportation including roadway and operational improvements that reduce traffic congestion. Accessibility and mobility plans have been included as part of overall redevelopment studies with economic development enhancements and consideration for access to key amenities and services for communities. Project experience includes:

- Department of Homeland Security Headquarters Consolidation at St. Elizabeths, Washington, DC
- Suitland Transportation and Streetscape Study, Suitland, MD
- Mid-City East Small Area and Livability Study, Washington, DC
- Mount Vernon Square District Transit Study, Washington, DC
- Rhode Island Avenue Great Streets Initiative, Washington, DC
- Eastern Boulevard/MD64, Washington County, Maryland

Redevelopment & Revitalization
Ms. White has directed a number of redevelopment and revitalization studies where she has gained significant experience developing transportation concepts by working with consultant planning teams, local agencies, and community groups. Her experience includes balancing the competing needs of various modes of transportation, including transit and pedestrian facilities. Project experience includes:

- Mount Vernon Square District Transit Study, Washington, DC
- Rhode Island Avenue Great Streets Initiative, Washington, DC
- Laurel MARC Station, Laurel, MD
- Morgan Boulevard, Largo, MD
- H Street, N.E. Redevelopment Project, Washington, DC
- Georgia Avenue Revitalization, Washington, DC
- Port Towns Peace Cross Revitalization Study, Bladensburg, MD

Transportation Demand Management (TDM)
Ms. White has managed and developed Transportation Demand Management plans for a number of uses including commercial, federal and institutional. The TDM’s include travel demand objectives, goals, strategies, and measures of effectiveness. One of the key starting points of a TDM is to outline existing conditions considering existing traffic data, parking utilization, vehicle occupancy and travel mode split data. Employee and patron surveys are often a tool used to establish base conditions. Ms. White has also conducted follow up surveys to monitor the success of TDM’s. Project experience includes:

- Department of Homeland Security Headquarters Consolidation at St. Elizabeths Transportation Management Program, Washington, DC
- Jewish Primary Day School, Washington, DC
- Lowell School, Washington, DC
- National Institutes of Health Monitoring Reports, Bethesda, MD
- Hine School Redevelopment, Washington, DC
- McMillian Sand Filtration Site Master Plan, Washington, DC
- Suitland Federal Center, Suitland, Maryland
- Goddard Space Flight Center, Greenbelt, MD

Transportation Safety
Ms. White has directed a number of projects that address transportation safety issues at problem locations. Studies include assessing crash data, developing collision diagrams, determining potential causal factors based on assessment of collision diagrams and field conditions, and developing crash countermeasures in accordance with industry guidelines. Ms. White is also experienced at developing and analyzing context sensitive solutions given the diverse transportation needs of urban areas. Project experience includes:

- District Department of Transportation Highway Safety Improvement Program, Washington, DC
- DDOT Speed Limit and Safety Nexus for Automated Enforcement Location, Washington, DC
- Mid-City East Livability Study, Washington, DC
- Barry Farm Master Plan, Washington, DC
Small Area Studies & Master Plans
Ms. White has experience managing the transportation component of Small Area Studies and Master Plans required for campuses and large scale development projects. Her work on these studies includes projecting and analyzing future transportation and parking conditions based on population and land-use growth, and recommending necessary improvements to transportation and parking systems. A key component of these projects includes developing a circulation system within the campus and access to adjacent land uses for multiple modes of transportation. Project experience includes:

- Bowie State MARC Station Sector Plan and Sectional Map Amendment, Bowie, MD
- Rhode Island Avenue Diamond of the District Small Area Plan, Washington, DC
- Department of Homeland Security Headquarters Consolidation at St. Elizabeths, Washington, DC
- McMillan Sand Filtration Site Master Plan, Washington, DC
- Suitland Federal Center, Suitland, Maryland
- H Street, N.E. Redevelopment Project, Washington, DC
- Mount Vernon Square District Transportation Study, Washington, DC
- Georgia Avenue Revitalization, Washington, DC