Amy Lindsey, Lead Reviewer 20 November 2026

MNCPPC, Department of Permitting

Montgomery County

RE: Regarding: Request for a Public Hearing, Application # F20250500,

Friends of Sligo Creek is requesting a hearing on the Yeshiva of Greater Washington proposed addition in Kemp Mill. We are a nonprofit community organization dedicated to protecting, improving, and appreciating the ecological health of Sligo Creek Park and its surrounding watershed. Below we describe our concerns which should require a hearing.

STORMWATER AND WATER QUALITY

The proposed project will make already existing stormwater and sediment-related water quality challenges for Sligo Creek and its headwaters far worse.

Little formal stormwater control exists now for the impervious surfaces upstream from above the major stormwater ponds in Kemp Mill and there is virtually no stormwater control for runoff from Kemp Mill Plaza to the Park. Because of this, contaminants are flowing down the nearby impervious surfaces and entering Sligo Creek.

Sediment also is one of our top concerns at and around the site. Over the years, we have often seen erosion problems on the property that send sediment directly to Kemp Mill Plaza from its long-sloped hillside border above the plaza's parking lot. More sediment problems would likely occur with construction, particularly on properties like this one, which feature steep slopes that would be destabilized under the proposed plan. Sediment kills aquatic life and prevents the natural environment from sustaining a decent quality stream. This problem is particularly damaging in a headwaters area which supports special flora and fauna.

While steps will be taken by the permitting authorities and permitted party to make sure that erosion and sediment controls (ESC) are taken, any ESC steps will fall short if the sloped hillside is destabilized by removing many mature trees. While not reflected in standard stormwater models for construction requirements, mature trees are well-recognized as the gold standard for storm water management.

Since the proposed development lies close to the headwaters of Sligo Creek, we also are extremely concerned about the potentially deleterious effects of sedimentation and stormwater on water quality over the entire length of the creek if appropriate measures are not taken.

FOSC strongly urges that the plan be changed to limit the amount of sediment and stormwater runoff into Sligo Creek that will result from the proposed removal of 13 mature trees from the property.

TREES IN SLIGO CREEK PARK

In addition, existing runoff issues would be exacerbated by the damage to, and removal of, a significant number of trees as proposed within the Sligo riparian buffer area where it borders the school property in the Park because their vital root zone will be damaged.

Montgomery Parks estimates that damage to trees in Sligo Creek Park from this project will require the removal of trees totaling 286 inches of diameter at breast height (DBH). This total is the equivalent of more than 10 mature trees at 28” DBH or 20 trees at 14” DBH. It seems unconscionable that one property owner can be allowed to cause such extensive harm to an adjoining property. This is particularly objectionable when it occurs in a public park.

Moreover, the existing mature trees provide wildlife services that young saplings simply cannot. These include the numerous cavities in mature trees that serve as nesting sites for our gray and flying squirrels and many of our favorite birds, such as chickadees, nuthatches, and woodpeckers. In addition, the abundant foliage in these trees act as food for countless caterpillars that are consumed in vast quantities during spring by our birds, especially during the nesting season.

We therefore ask that damage to the roots of other trees adjacent to the property in Sligo Creek Park be vastly reduced or prevented altogether through significant changes to the plan. We understand that the adjacent trees in the Park would not survive long following

certain damage to their roots and must be taken down preemptively by Montgomery Parks as a hazard.

We were made aware of this proposed development only recently although the Forest Conservation Plan and other supporting documents had been submitted more than a year and a half ago. We would use the time leading up to a public hearing to suggest measures that would minimize the proposal's effects on tree cover in the Park, stormwater runoff, and water quality in Sligo Creek.

In closing, our goal is to have a high-quality stream that the many people who live in our watershed can enjoy. This objective is shared by the County, which has provided considerable resources for improvement. Many neighbors agree. However, this achievement is not at all possible without rigorous enforcement of environmental laws and regulations from stormwater and sediment, including the recognition of the critical role to be played by basic natural infrastructure - like mature trees.

Thank you for your consideration.

Sincerely,

Kit Gage

Chair, Advocacy Committee

Friends of Sligo Creek

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