

BEN DYER ASSOCIATES, INC.

Engineers / Surveyors / Planners

January 31, 2021

J-A73112-9015

WO-116525

**STATEMENT OF JUSTIFICATION IN SUPPORT OF
IMPACTS TO REGULATED ENVIRONMENTAL FEATURES
4-20033**

DESCRIPTION AND LOCATION OF THE SUBJECT PROPERTY

On behalf of SSZ Suitland Self Storage, LLC (the "Applicant"), this Statement of Justification is submitted in support of impacts to the Primary Management Area ("PMA") for the subject property located at 4350 Forestville Road, Suitland, Maryland 20746. The applicant proposes the development of a consolidated storage facility.

The property is described as Parcel 153, "Peter and Susan Mandes". The subject property is found on Tax Map 89, Grid F-3 and is a legal lot of record. It is zoned I-1 (Industrial) and within the Military Installation Overlay with height restrictions. The subject property lies within the 2002 General Plan Developed Tier and Environmental Strategy Area ESA-2 of Prince George's 2035 General Plan.

a) GENERAL DESCRIPTION OF PROPOSED USE AND REQUEST

The Property is an existing 1.99 acre tract made up of one (1) parcel. The referenced Preliminary Plan of Subdivision 4-20033 is filed as a prerequisite to the subject property's proposed development of a consolidated storage facility. The proposed development will result in impacts to the PMA totaling 2,397 square feet, or 0.06 acres. The total PMA impact are depicted on PMA Impact Exhibits 1 & 2 (Exhibits) attached hereto and made a part hereof. The impact involves installation of a stormwater management treatment pond outfall and site retaining wall.

b) DESCRIPTION OF PROPERTY DEVELOPMENT HISTORY

The Subject Property is currently undeveloped and mostly wooded.

c) **DESCRIPTION OF REGULATED ENVIRONMENTAL FEATURES ON-SITE**

The property contains a small area of 100-year floodplain along the northern edge. This stream is associated with the Henson Creek. The floodplain area is depicted on FEMA panel 24033C023E (9/26/2016). The Department of Permitting, Inspections and Enforcement has approved a detailed delineation of the floodplain under study 202050 (12/1/2020). A Primary Management Area (PMA) is also mapped onsite and includes all regulated environmental features as indicated on the Approved Natural Resources Inventory NRI-166-2020.

d) **DESCRIPTION OF APPLICABLE STATUTES AND REGULATIONS**

Section 24-130(b)(5) of the Prince George's County Code requires that all plans associated with the application "shall demonstrate the preservation and/or restoration of regulated environmental features in a natural state to the fullest extent possible consistent with the guidance provided by the Environmental Technical Manual established by Subtitle 25."

The Environmental Technical Manual ("ETM") sets forth the procedure for ensuring that the Regulated Environmental Features are preserved and/or restored to the "fullest extent possible". This procedure is a three-step process which starts with the avoidance of impacts. If impacts are unavoidable and necessary to the overall development of the site, the impacts must be minimized. Finally, if the cumulative impacts are significant and above the designated threshold, then mitigation may be required in certain circumstances. The ETM also acknowledges that certain impacts such as those related to infrastructure and access, or resulting from County Code for reasons of health, safety or welfare are necessary. Impacts solely associated with increasing the development envelope where reasonable alternatives exist are typically not permitted.

e) **SPECIFIC DESCRIPTION OF THE PROPOSED IMPACTS TO REGULATED ENVIRONMENTAL FEATURES AND JUSTIFICATION OF AVOIDANCE AND MINIMIZATION**

As stated above, the Subject Property contains regulated environmental features within the PMA.

The Applicant proposes to impact 2,397 square feet, or 0.06 acres of the PMA, including 100-Year Floodplain, on site, as depicted on Exhibits 1 and 2. Of this impact, 1,718 square feet is proposed to land impacted by the 100-year floodplain. Impacts 1 and 2 proposed by the Applicant involves impacts to the PMA and floodplain to install a stormwater management pond outfall to achieve a non-erosive disclosure location for discharge to Henson Creek, and to install a new retaining wall. Note: All 100-year floodplain impacts are included within the total PMA impact area.

TABLE 1: PMA IMPACTS SUMMARY TABLE

Impact ID	Impact Type and Duration	Total Acreage or Square footage of PMA Impact	Area of 100 floodplain Impact
1	Stormwater Discharge and Retaining Wall	1,036 SF	517 SF
2	Stormwater Discharge	1,361 SF	1,201 SF
Total		2,397 SF	1,718 SF

f) MITIGATION

As stated in the ETM, “mitigation” means the design and installation of measures to enhance, restore, or stabilize existing environmentally degraded streams and/or wetlands to compensate for proposed impacts. Mitigation is required for significant impacts to regulated streams, wetlands, and 100-year floodplains. Significant impacts are defined as the cumulative impacts that result in the disturbance on one site of 200 or more linear feet of stream beds or one-half acre of wetland and wetland buffer area. There no impacts proposed to wetlands, their associated buffers, or streams by the application.

CONCLUSION

Based upon the above, The Applicant submits that the proposed disturbances to the PMA and Floodplan area are a reasonable approach to developing this site. The total amount of the proposed PMA impact covers an area 2,397 square feet, or 0.06 acres of the Subject Property. We believe the proposed limited impact satisfies the criteria for approval in the ETM. The impacts proposed are the minimum necessary to achieve development of the Property, provide a non-erosive pond outfall and mitigation is not required. For these reasons, the Applicant submits that the requirements of Section 24-130(b)(5) have been satisfied and that the Planning Board can find that the plans associated with the subject application demonstrate the preservation and/or restoration of regulated environmental features in a natural state to the fullest extent possible, consistent with the guidance provided by the Environmental Technical Manual.

Sincerely,
Ben Dyer Associates, Inc.



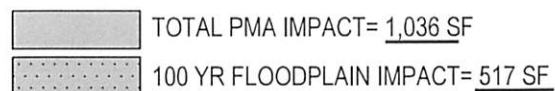
Michael A. Petrakis
Section Head
Environmental Planning Section

Attachments:



- PMA Exhibit

PM:PW

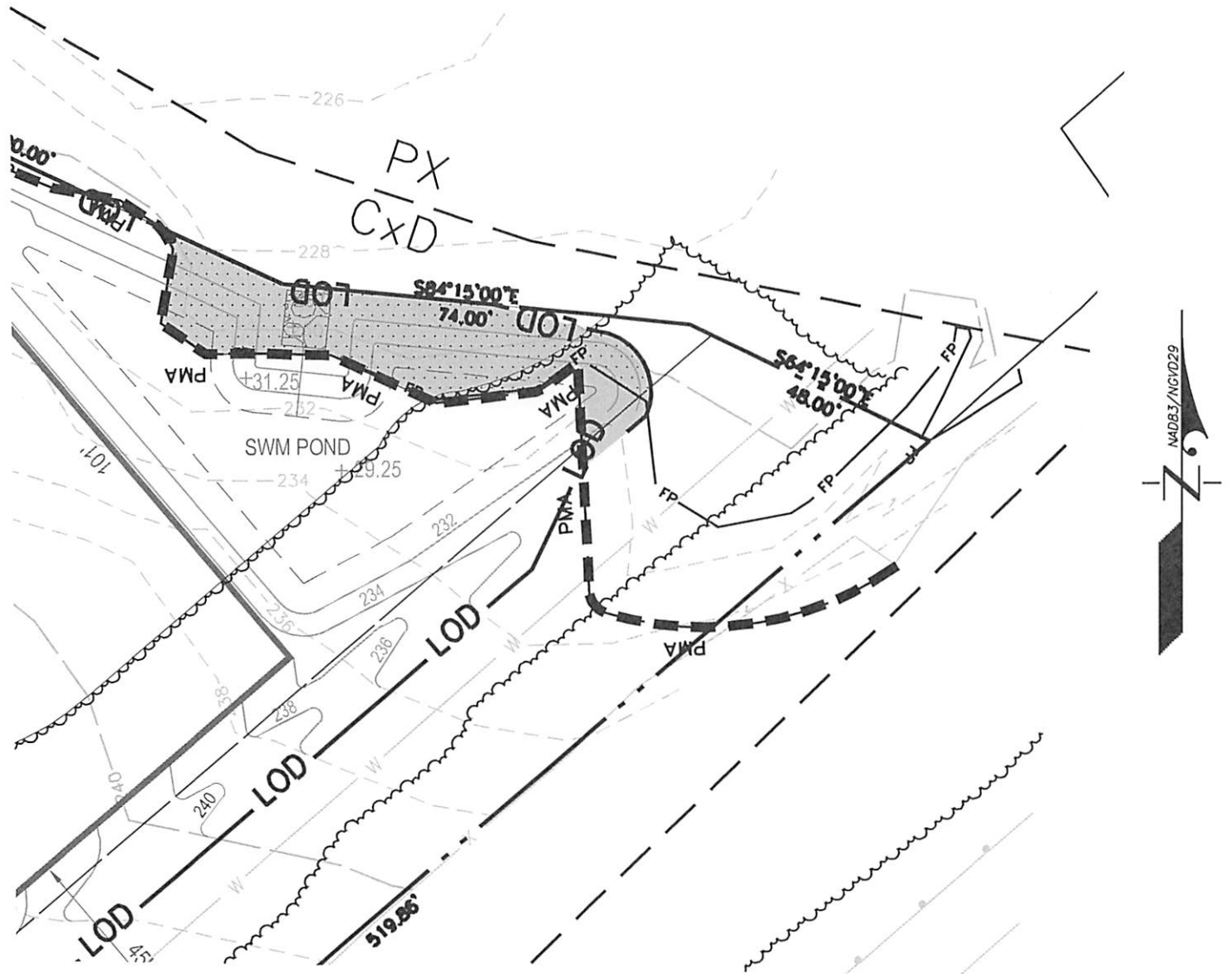
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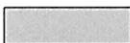

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SCALE: 1"=30'			



-  PMA PRIMARY MANAGEMENT AREA (PMA)
-  FP 100 YR FLOODPLAIN LIMITS
-  LOD LIMIT OF DISTURBANCE (LOD)

-  TOTAL PMA IMPACT= 1,361 SF
-  100 YR FLOODPLAIN IMPACT= 1,201 SF

PMA IMPACT EXHIBIT 2
 PARCEL 153
SUITLAND SELF STORAGE ZONE
 SPAULDINGS DISTRICT No. #6
 PRINCE GEORGE'S COUNTY, MARYLAND

11721 WOODMORE ROAD, SUITE 200
 MITCHELLVILLE, MARYLAND 20721

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