

**MODIFICATION OF GENERAL DEVELOPMENT PLAN,
MEADOWBROOK STABLES RIDING RING C PAVILION**

Rock Creek Stream Valley Park Unit 1 North
Chevy Chase, Maryland

May 7, 2020

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508) and National Capital Planning Commission Environmental Policies and Procedures, I have evaluated the new Meadowbrook Stables (Meadowbrook) Riding Ring Pavilion in the Rock Creek Stream Valley Park Unit 1 North in Chevy Chase, Maryland, as shown on NCPC Map File No. 76.21.01(05.00)45058. The Montgomery County Department of Parks (MCDP) and Meadowbrook Foundation, Inc. (MFI) prepared a draft Environmental Assessment (EA) as part of the project's preliminary review submission to NCPC. The Commission posted the draft EA on the Agency website for a 30-day public comment period from November 18 – December 18, 2019, with preliminary approval granted by the Commission on December 5, 2019. NCPC revised the EA and posted the document on its Agency website for an additional 2-week public comment period on March 4-18, 2020, in advance of its May 7, 2020 meeting.

The Commission received multiple public comments in response to its draft EA (November 2019), revised EA (March 2020), and preliminary review Executive Director's Recommendation (December 5, 2019). A comment table is included in the final EA and final review Executive Director's Recommendation (EDR) with NCPC staff responses to each comment. In addition, all materials submitted to NCPC for the record (including the March 4-18, 2020 public comments) are included in their original format in the final review EDR (May 7, 2020) Appendix.

PURPOSE AND NEED

The purpose and need of a covered riding area at Ring C is to enable Meadowbrook to meet current recommended standards of horse care and maintain classes and training during unfavorable outdoor conditions. Prolonged rain events result in unsafe conditions for horses to exercise and classes to take place, which are described in more detail below. Last year, Meadowbrook had to cancel many lessons/training sessions and one of its horse shows, resulting in less practice time for riders and reduced income for the facility. Meadowbrook would not increase the number of lessons/training sessions with the proposed pavilion, which are limited by a lease agreement with MCDP. A new Ring C pavilion would address the need for safe lesson/training space when inclement weather conditions and unsafe horse footing conditions exist and allow many of the outdoor programming to continue.

Horse Health and Wellness and Rider Safety

Standards in horse health and wellness have evolved significantly since the 2001 Montgomery County Planning Board approval of the comprehensive Meadowbrook development plan. Current knowledge related to horse health care is provided by the U.S. Equestrian Federation and from multiple scholarly articles over the years regarding medical discoveries and treating health-related problems. This entails having unstructured “turn out” time each day where horses can exist outside of their stalls in addition to more structured exercise time. While there is no problem for horses to be out in drizzle, rain, and moderate wind during turn out periods, if the sand rings become too saturated with water from prolonged periods of rain, horse footing conditions can degrade to the point where horse safety is jeopardized. When this happens at Meadowbrook today, with four open rings, horses are denied the opportunity to train and exercise.

Continued Operations

The problem of prolonged rains degrading horse footing conditions in the open sand rings is also having an impact on Meadowbrook’s operations. Saturated rings following prolonged rains minimize the amount of riding time for lessons and shows, and ultimately have an adverse financial impact on facility operations as budgeted income is diminished. Private lessons and horse shows are canceled altogether, and group lessons are moved indoors, into a classroom setting, which is not as beneficial and enjoyable as actual riding time.

Last April, Meadowbrook had to cancel one of its three annual horse shows due to prolonged rains before the event, which degraded ring conditions, resulting in an estimated loss of \$20,000 in income. In addition, lesson cancellations can result in an income loss of approximately \$50,000 per year, which makes it more difficult for Meadowbrook to continue its wide variety of programming. Meadowbrook reports that 179 private lessons and 219 team practice sessions were cancelled from September 2019 to February 2020 due to inclement outdoor conditions, resulting in \$36,000 of lost income for the facility. Meadowbrook’s Board of Directors considers a covered riding ring to be critical to facility operations that must continue to evolve to maintain contemporary business, training, education, and horse safety standards. Similar nearby equestrian facilities all have indoor arena space including Wheaton Park Stables, Rock Creek Park Horse Center, and the Potomac Horse Center.

PROPOSED ACTION / PREFERRED ALTERNATIVE

New Ring C Pavilion (Preferred). MCDP, in coordination with Meadowbrook, proposes to construct a new pavilion over riding Ring C, measuring 225-feet in length, 125-feet in width (covering an area of 28,125 square feet), with a sloped rooftop ranging in height between 16- and 32-feet (along the ridgeline). The center cupola on the roof will reach 41-feet 8 inches. Plans show the new structure with a metal standing-seam roof with solar panels, rooftop cupolas, and sides constructed with a stone skirt at each of the building corners; trim around the windows and doors; board-and-batten style siding, with historic exterior light fixtures. The pavilion would have retractable sliding doors (with windows), to allow for an open-air environment, with the ability to shelter interior activities from inclement weather (cold, wind and thunderstorms) conditions. The

pavilion would not have any mechanical infrastructure (i.e. heating and cooling) and no sound system but would have electricity to allow for interior lighting.

Other ancillary site development would include additional landscaping, two new bioswales (north and south/west), a new walkway, and a new horse/pedestrian path between the internal access road and Ring C. The existing fencing surrounding the current Ring C would be removed, with new fencing installed inside the pavilion. The outer Meadowbrook perimeter fence would remain in place, and space for a public viewing area would be along the northside of the all-weather arena. The landscape-stormwater management plan is designed to manage all stormwater from the roof through vegetation and bioswales. New evergreen trees, ornamental trees, shade trees, and shrubs are proposed to help obscure the new pavilion from off-site views.

The project would remove 20 existing adjacent elevated floodlights immediately surrounding the Ring C site, since the new pavilion would have interior lighting, thereby negating the need for the taller outdoor floodlights. The pavilion would have downward-facing lighting over doorways as required by building codes. The other 36 floodlights on the Meadowbrook Stables property would remain to continue night-time illumination of the other riding rings (A, B, D) during operating hours.

OTHER ALTERNATIVES EVALUATED

No-Build Alternative. This alternative assumes that Meadowbrook Stables would continue to operate under its current condition, with four separate unprotected riding rings. No new construction is planned under this alternative, and operation of all four rings would continue with full weather exposure (snow, rain, wind), thereby interfering with training/show schedules, animal health/wellness, user experience, and the overall financial condition of the facility. This alternative does not fulfill the project Purpose & Need but serves as a useful baseline comparison for the preferred “action” alternative (construction of a new Ring C pavilion), which is required under NEPA regulations.

ACTION ALTERNATIVES DISMISSED

Ring D Pavilion. MCDP and Meadowbrook Stables previously identified a new 29,400 square foot pavilion (with 20,000 square feet of riding area) over Ring D in 2003 as the preferred location; however, upon more recent review of the site options, MCDP concluded that Ring C is preferable due to its increased distance from Rock Creek and minimal site grading to accommodate the new structure. Meadowbrook has concurred with this finding as Ring C could accommodate a 28,125 square foot pavilion (with a 25,875 square feet of riding area), maximizing safe rider training, horse exercise and welfare due to its size as discussed in detail in the following section. While the previous Ring D pavilion design was nearly the same size as the pavilion currently proposed for Ring C, the maximum area for riding that could have been achieved at Ring D was 20,000 square feet. A larger rideable area would have required fill within the floodplain. At the time, the Ring D pavilion included sheltered space for viewing stands and a judging booth within the pavilion, which did not require any fill. The current proposal allocates much of the area under the pavilion at Ring C to riding area. A public viewing area for standing spectators would be located under the pavilion along the northside arena fence-line. Specific reasons include:

- 1) *Greater All-Weather Capacity:* The current size and grading at Ring C allow for 30% more all-weather potential arena space than Ring D (25,875 SF compared to a 20,000 SF Ring D arena). Creating the same amount of rideable space at Ring D would require sizeable fill within the floodplain. The larger area at Ring C would enable twice as many users during unfavorable ground conditions than a pavilion in Ring D, equating to capacity for 180 additional riders (360 total) per week. The larger all-weather space would accommodate two user groups simultaneously, whereas the Ring D arena space would only allow one user group at a time. Thus, during inclement weather, Meadowbrook Stables could consolidate two of its four lesson groups into a covered Ring C, thereby enabling 50% of its scheduled programming to continue. The larger interior pavilion height would also allow a course of jumps which is frequently taught in upper level classes, whereas this could not be accommodated in a smaller Ring D pavilion. While Ring B is also further away from Rock Creek than Ring D and could accommodate the new pavilion, there would have been less space immediately adjacent to the pavilion for landscaping and stormwater management.
- 2) *Continued Horse Turn Out Space in Rings A,B, and D During Good Weather:* Standards of care have evolved during the last 20 years (when the County planning board approved the original development plan), with at least two to three hours of recommended free, unstructured (“turn-out”) time each day for each horse, with direct staff supervision to ensure their safety. If left unwatched, the horses can injure themselves, either because of their inquisitive nature or if their play becomes overly aggressive. At least three rings at Meadowbrook Stables are required to enable the amount of unstructured exercise time necessary to accommodate all 50 horses. Based on proximity to the Meadowbrook Stables barn, where staff frequently perform their work, Rings A, B, and D afford the best level of visibility based on proximity. Horses turned out in these three rings can be seen directly from workspace in the barn. If any of these rings were to be covered, it would make direct staff oversight from the barn more difficult. Ring C is the furthest away from the barn and for this reason, Ring C has not been used for turnout for over 20 years.

Ring A and B Pavilions. Rings A and B are much smaller than Ring C, and would not accommodate as much rideable area, stormwater management, and landscaping. Thus, for the same reasons stated for Ring D above, Rings A and B do not meet the project Purpose and Need and were dismissed.

STANDARD FOR EVALUATION

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an Environmental Assessment is deemed sufficient (and an Environmental Impact Statement (EIS) is determined to be unnecessary) if the study supports the finding that the mitigated federal action would not significantly affect the human or natural environment. The EA for this project were prepared in accordance with this standard.

POTENTIAL PROJECT IMPACTS

The Environmental Assessment uses the following “impact” topic areas to assess the preferred Ring C Action Alternative: Floodplains, Stormwater Management/Water Quality, Visual Resources, Cultural Resources, Transportation and Parking, Noise, and Air Quality. The following sections briefly describe the associated beneficial and adverse impacts for the project, in

conjunction with planned mitigation to reduce potential project effects. NCPC uses the EA to determine whether each potential impact is sufficiently assessed and mitigated through the study, or whether a more detailed Environmental Impact Statement (EIS) is warranted.

Floodplains. As described in the final EA, the project is within the 100-year floodplain because there are no practicable alternative sites outside of the floodplain. However, the structure's use and design minimize potential harm to the floodplain. The non-habitable pavilion has no "critical" functions housed within, such as facility medical/care uses or power production, and the site will remain a passive flood tolerant use with no heating or cooling systems. Specific design measures that mitigate potential impacts include lowering the finished floor elevation, designing the structure to allow flow-through flooding, lowering exterior grades around the new arena to provide additional floodplain storage, and passive louvers in all retractable doors to enable floodwater flow between the interior space and outside with minimal impedance. There would be nothing under the pavilion other than a ring fence and sandy riding ring surface, neither of which is sensitive to water damage and could not be readily replaced. An assessment report ("Alteration of the Floodplain Computations and Report") was prepared for review by the Maryland Department of the Environment (MDE), which concluded no floodplain impact by the project, and MDE issued a subsequent authorization to proceed (with construction) on January 28, 2020.

Short-term floodplain-related impacts could result from the presence of increased activity on-site.

Mitigation: Potential short-term construction-related impacts would be mitigated through Maryland Department of the Environment Best Management practices for floodplain construction, including:

- No excess fill, construction material, or debris shall be stockpiled or stored in nontidal wetlands, nontidal wetland buffers, waterways, or the 100-year floodplain.
- Materials shall be placed in a location and manner which does not adversely impact surface or subsurface water flow into or out of nontidal wetlands, nontidal wetland buffers, waterways, or the 100-year floodplain.
- Heavy equipment shall be placed on mats or equipment shall be suitably operated to prevent damage to nontidal wetlands, nontidal wetland buffers, waterways, or the 100-year floodplain.
- Any serviceable structure or fill shall be repaired and maintained so there is no permanent loss of nontidal wetlands, nontidal wetland buffers, or waterways, or permanent modification of the 100-year floodplain in excess of that lost under the originally authorized structure or fill.
- Any nontidal wetlands, wetland buffers, waterways, or 100-year floodplain temporarily impacted shall be rectified by any construction.
- After installation has been completed, post-construction grades and elevations shall be the same as the original grades and elevations in temporarily impacted areas.
- Stormwater runoff from impervious surfaces shall be controlled to prevent the washing of debris into the waterway.
- Culverts shall be constructed, and any riprap placed so as not to obstruct the movement of aquatic species, unless the purpose of the activity is to impound water.

Stormwater Management / Water Quality. The landscape-stormwater management design will manage stormwater on-site through vegetation and bioswales. A new roof over 28,125 square feet of Ring C will channel stormwater into two new bioswale areas adjacent to the pavilion, with enough capacity to capture and filter stormwater through plantings and infiltration media. Conversion of over 30,000 square feet (approximately 53% of the project site) into more permeable area, with new native vegetation, micro-topography, and bio-swales, will recharge groundwater in smaller storms, treat runoff from moderate storms, and convey water around the site in larger storms into the bioswales, sediment trap and stormwater management ponds. The site design will comply with all mandatory State requirements from the Maryland Department of the Environment (National Pollutant Discharge Elimination System) and Montgomery County regulations, resulting in improved Rock Creek water quality with more controlled stormwater runoff on-site.

Short-term stormwater management-related impacts could result from the presence of increased activity on-site.

- **Mitigation:** Potential short-term construction-related impacts will be mitigated by adherence to Maryland Department of the Environment Best Management practices, and rules/regulations as defined through the County's mandatory permitting process.

Visual Resources. There will be long-term impacts to some visual resources. The new pavilion (32-feet at the roof peak/41-feet and 8 inches in height at the center cupola) would be largely visible from six residences along Abilene Drive, as well as ground-level vantage points along Rock Creek Trail (for approximately 1,600 feet / 0.3 miles) and Meadowbrook Lane. The closest residences to Ring C would likely look at the pavilion facades and rooftop in addition to new trees and other vegetation added to the site. Views of horse activity in Ring C would be more limited to ground level along Meadowbrook Lane and the Rock Creek Trail through operable doors (consistently raised for approximately 8 months of the year). Renderings depict the new pavilion from several different nearby vantage points.

The pavilion will not be as visible from more distant vantage points further to the north, south, and west along Meadowbrook Lane. Views further to the west and northwest (from Beach Drive); southwest (from Meadowbrook Local Park); south (from the Parks Department Maintenance Facility); north (from the north of the barn); and east (from the interior of the Rock Creek Forest neighborhood) would remain relatively unchanged. Beneficial visual long-term impacts would likely result from 20 fewer floodlights surrounding Ring C, both during daylight and evening hours. The new pavilion would have interior lighting, with limited downward-illuminating, exterior lighting only above doorways as required by building codes.

- **Mitigation:** Overall, the structure would be visible, especially for nearby Rock Creek Trail users and the closest six residences to the east along Abilene Drive. Existing vegetation (on both sides of Meadowbrook Lane) and new additional landscaping would help screen the new pavilion from off-site views. Significant landscaping (over 30,000 square feet) would be added to half of the site, with native trees, sedges, grasses, and shrubs. In addition to landscaping, the pavilion design is intended to be compatible with the historic barn, with a stone skirt at each of the building corners; trim around the windows and doors; board-and-batten style siding; historic exterior light fixtures; and three rooftop cupolas. These measures

will help the new structure fit within the existing Meadowbrook Stables setting as an equestrian facility.

Short-term visual impacts from construction would be limited to the planned 8-10-week duration (summer 2020) of the phase, with views of the property temporarily affected by the presence of additional trucks and equipment on the property.

- **Mitigation:** Construction would be staged from the southern on-site parking area, directly across from Ring C, away from the Rock Creek Forest neighborhood to the east of the project site. Construction impacts would be mitigated through active site management and adherence to rules and regulations as defined through the County's mandatory permitting process.

Cultural Resources. As described in the final EA, the pavilion would be located in the southeastern area of Meadowbrook's property, separated from the historic Meadowbrook Barn by the picnic area, several rows of trees, and Rings A and B. The current use of Ring C would continue once project construction is complete, and the new pavilion design would be compatible with the architectural look of the historic barn. The existing character of Meadowbrook Stables as an equestrian facility – manifested by green space, the presence of horses, quality of upkeep, and park-like setting that is open and welcoming to the community – would remain the same.

MCPD and Meadowbrook Foundation, Inc. developed an assessment report that concludes that the project would not result in an "alteration to the characteristics of historic property qualifying it for inclusion in, or eligibility for, the National Register of Historic Places." The Maryland Historic Trust (MHT) reviewed the report and issued a "no adverse effect" concurrence with the finding on November 19, 2019. Separately, NCPC initiated Section 106 consultation with MHT to fulfill its Section 106 compliance responsibilities, with a "no adverse effect" determination. The MHT concurred in writing with the NCPC determination on February 21, 2020 (Final EA Appendix).

Short-term construction-related impacts would result from increased traffic including trucks delivering equipment and material to the site, and material storage on the southern on-site parking area, away from the historic Meadowbrook Barn.

- **Mitigation:** Any potential short-term construction related impacts would be mitigated through active site management and adherence to rules and regulations as defined through the County's mandatory permitting process.

Transportation and Parking. As described in the final EA, the project would not change existing Meadowbrook-related traffic and parking patterns since current programming would remain the same under the existing concessionaire agreement with M-NCPPC, as well as the physical capacity limitations of the facility. Long-term impacts would be negligible based on the continuation of the existing programming at Meadowbrook Stables.

Short-term construction-related impacts would result from increased traffic including trucks delivering equipment and material to the site. Deliveries would enter the property through the southern gate and all construction-related traffic would park on Meadowbrook property.

- **Mitigation:** Any short-term construction-related impacts would be mitigated through active site management and adherence to rules and regulations as defined through the County's mandatory permitting process.

Noise. As described in the final EA, the project would not change existing Meadowbrook-related activities since current programming would remain the same under the existing concessionaire agreement with M-NCPPC, as well as the physical capacity limitations of the facility. Long-term impacts such as loud noise would be negligible since noise levels would remain generally the same based on the continuation of the existing programming at Meadowbrook Stables. However, noise levels related specifically to Ring C may be marginally reduced when the retractable doors are periodically closed during operating hours when outdoor conditions warrant.

Short-term noise-related impacts would result from the presence of increased activity on-site.

- **Mitigation:** Any short-term noise related impacts would be mitigated through active site management and adherence to rules and regulations as defined through the County's mandatory permitting process.

Air Quality. As described in the final EA, the project would not change existing Meadowbrook-related activities since current programming would remain the same under the existing concessionaire agreement with M-NCPPC, as well as the physical capacity limitations of the facility. Long-term impacts such as degradation of air quality would be negligible since existing activities would remain generally the same based on the continuation of the current level of programming at Meadowbrook. The new enclosure would likely reduce fugitive dust from Ring C through the pavilion's overhead sprinkler system and protection from direct sunlight and wind, which contribute to drier soil conditions that can lead to escape of dust.

Short-term construction-related impacts would result from the presence of increased activity on-site.

- **Mitigation:** Short-term air quality impacts would be mitigated through active site management and adherence to rules and regulations as defined through the County's mandatory permitting process. In addition, construction would cease on days with poorer air quality (Code Red or Orange) is identified by the Metropolitan Washington Council of Governments so as not to adversely impact local/regional air quality.

DETERMINATION AND FINDING

Under the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an Environmental Assessment (EA) is sufficient if the study supports the finding that the mitigated federal action would not significantly affect the human or natural environment. Based on the project submission, revised and final EA documents, and NCPC staff analysis, I have determined that the proposed new Ring C pavilion would not have a significant impact on the human or natural environment based on the proposed mitigation measures. Therefore, this EA study is sufficient to satisfy NCPC's environmental review responsibility for the project under its NEPA implementing policies, and an EIS is not warranted.

A handwritten signature in black ink, appearing to read 'Marcel C. Acosta', written over a solid horizontal line.

Marcel C. Acosta
Executive Director, NCPC