

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

IN THE MATTER OF THE APPLICATION	)	
	)	
OF S.W. BLOYD, LLC FOR	)	Conditional Use Application No.
	)	CU 2024-19
A CONDITIONAL USE FOR	)	
	)	
A RESIDENTIAL CARE	)	
	)	
FACILITY FOR NINE (9) TO SIXTEEN	)	
	)	
(16) RESIDENTS	)	

**PETITIONERS' PRE-HEARING SUBMISSION**

The Applicant in the above-referenced case, S.W. Bloyd, LLC, ("Applicant"), in accordance with Rule 3.4 of the Rules of Procedure for the processing of a conditional use application before the Office of Zoning and Administrative Hearings, submits the following information:

**A. Statement of the Grounds for Approval of the Application**

As part of its application materials, as amended, the Petitioners have submitted a Statement of Justification setting forth the grounds for approval of the application. The Petitioners incorporate that document herein by reference thereto.

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

1. The proposal is not inconsistent with the planning recommendations contained In Bethesda-Chevy Chase Master Plan.
2. The proposed use will meet the use standards prescribed in Section 59.3.3.2.E.2.b of the Zoning Ordinance.
3. The proposed use will satisfy the requirements of the underlying R-60 Zone.

4. The use complies with the standards for the granting of a conditional use set forth in Section 59-7.3.1.E.1 including adequacy of public facilities.
5. The application satisfies the standards Section 59.6 regarding the general development standards for a site such as parking, landscaping, lighting, etc.
6. The proposal meets all requirements for adequacy of public facilities to serve the use.

**B. Copies of all reports intended to be introduced at the OZAH hearing**

The Petitioners will submit no reports for consideration by the Hearing Examiner. The record of the case does contain a Traffic Statement confirming that the application is exempt from having to prepare a Traffic Study due to the low volume of trips generated by the prepared use.

**C. The names of all experts expected to testify at the hearing, their resumes and a summary of their respective testimony**

1. Andrew Bradshaw, Civil Engineer/Site Designer, Johnson Bernat & Associates  
Mr. Bradshaw has been responsible for preparation of all plans associated with this conditional use application. Mr. Bradshaw will testify about all engineering matters associated with this case including features of the site, compliance with Montgomery County development regulations (e.g., Stormwater Management, Forest Conservation, etc.) and adequacy of public facilities. Mr. Bradshaw will also explain how the application, from a civil engineering point of view, will satisfy the development standards of the underlying R-60 Zone, the requirements for the proposed use and the general conditions for the granting of a conditional use.

**D. Other Witnesses**

In addition to the expert witness listed above, Mr. Steven Bloyd, the principal of the Applicant, will testify about a) the history of his company, b) the previous use of the site, c) the desire to increase the occupancy of the facility and d) all operational information about the proposed use.

**E. Estimated Time for Presentation**

The Applicants estimate that it will take two to three (2-3) hours to present its case.

Respectfully submitted,  
MILLER, MILLER & CANBY

JODY KLINE

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*Counsel for Petitioners'*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 15<sup>th</sup> day of November, 2024, a copy of the foregoing Applicants' Pre-Hearing Submission was mailed, first class, postage prepaid to:

Tsaigvan Gatling  
MNCPPC  
2425 Reddie Drive, 14<sup>th</sup> Floor  
Wheaton, MD 20902

JODY KLINE

Jody S. Kline



Johnson ♦ Bernat ♦ Associates, Inc.

**Andrew M. Bradshaw, P.E.**  
**Project Manager**

**EDUCATION:** Clemson University, South Carolina  
B.S. Civil Engineering 2003

**PROFESSIONAL**

**REGISTRATION:** Professional Engineer – Maryland, District of Columbia

**PROFESSIONAL**

**EXPERIENCE:** 21 Years Total Experience

**PROFESSIONAL SUMMARY:**

Mr. Bradshaw is a Project Manager at Johnson ♦ Bernat ♦ Associates, Inc. and has over fifteen years of experience in the design of commercial and institutional projects. Mr. Bradshaw has experience as an engineering project manager, and designer for office, industrial, institutional and residential land development, as well as public works projects. His responsibilities include design and management of civil engineering projects. His past assignments include schematic and final design, stormwater management facility design and as-built, zoning analysis, preparation and review of plans and specifications, earthwork and feasibility studies, and preparation of permit and construction documents.

**REPRESENTATIVE PROJECT EXPERIENCE**

NATIONAL INSTITUTES of HEALTH – NIH-TIL Modular Building, Bethesda, Maryland – Provided civil design for Modular Building including site improvements and stormwater management design.

RANDOLPH ROAD, Montgomery County, Maryland – Prepared site and engineering design for 200-unit multi-family project for affordable housing.

WESTWOOD, Bethesda, Maryland – Provided design for mixed-use, retail and multi-family project for redevelopment of aging shopping center, totaling 838,000 sf, including grocery anchor.

NATIONAL CANCER INSTITUTE, Rockville, Maryland – Oversight of engineering design of 575,000 square foot office building with associated 1,900 space parking deck. Included retrofit of existing stormwater management pond. Current project includes construction of 69,000 square foot laboratory building to complement headquarters.

ASBURY METHODIST VILLAGE, Gaithersburg, Maryland – Responsible for design of numerous facilities for retirement/elderly care community.

**Engineering ♦ Surveying ♦ Planning**

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