



Vandy Gyandhar  
Danielle Freedman  
Valencia McClure  
Potomac Electric Power Company  
701 9th Street NW  
Washington DC 20068

July 22, 2023

Dear Ms. Gyandhar, Ms. Freedman, and Ms. McClure,

We would like to bring two matters to your attention and request a response.

First, we were disappointed to observe that Pepco chose to install "wall pack" style light fixtures at its recently-built but yet to be energized White Flint electric distribution substation located at 11650 Nebel Street in Rockville, Maryland. This style of fixture wastefully directs most of its light output sideways and upwards, harming visibility, creating glare and contributing to light pollution and sky glow.

The light fixtures fail to conform with the [lighting and landscaping plan Pepco filed](#) with the Montgomery County Planning Director before being granted an administrative subdivision (620180020). They also differ greatly from the renderings posted to Pepco's website and submitted to Montgomery County planning staff and to the community prior to the Planning Board's public review via the mandatory referral process.

Pepco is capable of installing well-designed light fixtures at its substations as evidenced by the full-cutoff fixtures installed around the same time at its Darnestown substation also in Montgomery County.

**We ask that you take appropriate action to shield these poorly designed fixtures or replace them with more appropriately designed full-cutoff fixtures.**

Second, it has come to our attention that Pepco is missing opportunities to participate more fully in Montgomery County's Development Review process. Per Chapter 50 of the Montgomery County code, when new projects are proposed, utilities are invited to participate at the earliest stages of the development review process alongside government agencies. We are told that unlike other utilities, Pepco has been unwilling to engage by attending Development Review Committee meetings or public hearings of the Montgomery County Planning Board when invited. Planning staff and the Planning Board devote a good amount of attention to utility matters such as undergrounding during

development review and Pepco's absence makes it harder to ensure proper coordination and harmonious development.

For example, we are told that Pepco declined to fully participate in discussions about the development of an affordable housing project near Nebel Street and Old Georgetown Rd, just two blocks away from the White Flint substation. Pepco is proposing to reconfigure feeders and install buried ductwork under Nebel Street and nearby streets for the substation project. The Planning Board has asked the affordable housing developer to bury overhead utilities along their Nebel Street frontage per the sector plan. Pepco's absence from Development Review Committee meetings and Planning Board public hearings regarding this project makes it more difficult to coordinate redevelopment activities with Pepco's planned activities. A lack of coordination can result in suboptimal decisions about infrastructure resilience, increased cost and a failure to meet the obligation to "dig once" so that disruption to communities can be minimized.

**We ask that Pepco begin fully participating in the Development Review process in Montgomery County so that opportunities for harmonious development will not be missed in the future.**

We look forward to your response on these matters.

Sincerely,

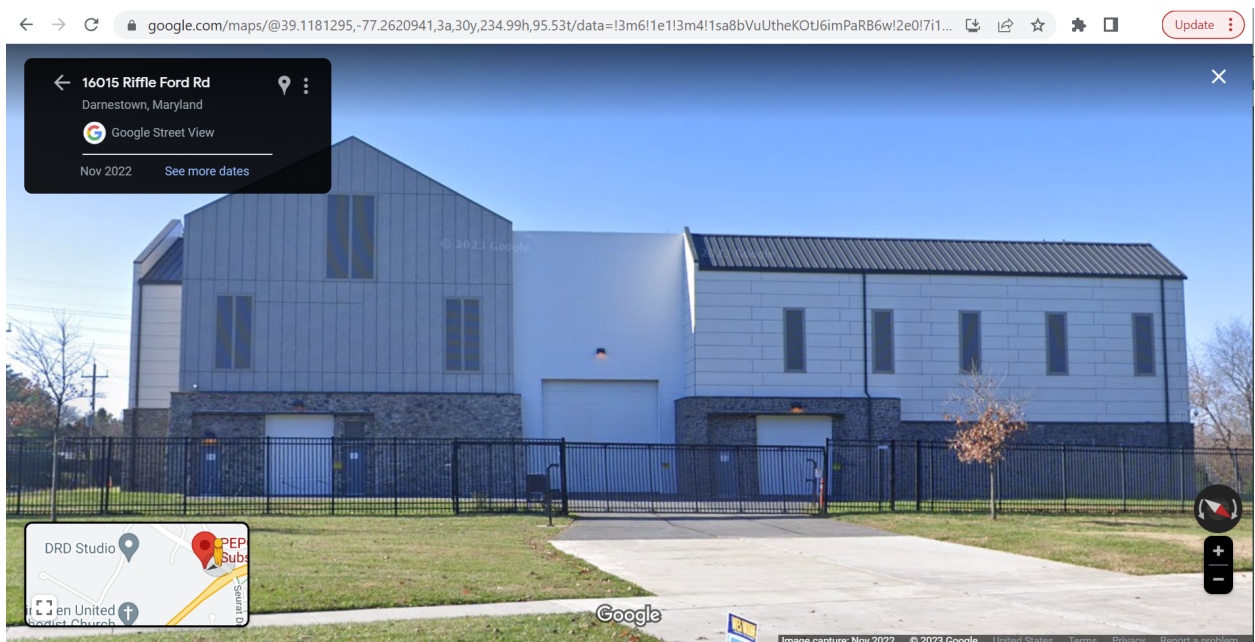
Darian Unger, Chair  
Sierra Club Montgomery County Group  
dwunger@howard.edu

cc: Kate Stewart, District 4 Montgomery County Councilmember  
Tanya Stern, Acting Montgomery County Planning Director  
Rabbiah Sabbakhan, Director - Montgomery County Department of Permitting Services  
Tom Lewis, Montgomery County Development Ombudsman  
Lisa Brennan, Associate Montgomery County Attorney  
Delegate Lesley Lopez, chair of the Development Review Working Group  
David Lapp, People's Counsel for the State of Maryland

Photograph of Pepco's White Flint substation at 11650 Nebel St with "wall pack" fixtures



Google street view photograph of Pepco's Darnestown substation with full cutoff fixtures



From the Montgomery Planning staff's packet for this project showing renderings



## ANALYSIS

### **Master Plan Conformance**

The proposed PEPCO White Flint substation is in the Nuclear Regulatory Commission (NRC) District in the 2010 *White Flint Sector Plan* area. The Sector Plan does not specifically recommend the location of new public utilities; however, utilities are permitted in the CR Zone. Further, the proposed substation will support the future anticipated residential and non-residential growth in the Sector Plan area.

### **Master Plan Roadways and Bikeways**

Nebel Street is classified as a public business district street with a minimum 80-foot right-of-way and is identified in the Sector Plan as a segment of the recreational loop in the Plan area. Marinelli Road is also classified as a public business district street with a minimum 90-foot right-of-way. The submitted