

Comments on the Bethesda Downtown Minor Master Plan Amendment

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Written testimony submitted by

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Thank you for the opportunity to submit this testimony. I apologize up front for focusing on the Technical Attachments that form the basis for the conclusions of the report, but in reviewing the underlying analysis, I found critical problems that fundamentally undermine the report's credibility.

Three examples:

- The analysis assumes that population in Bethesda will **decrease** by 14 percent from the baseline by 2045 in scenario 1 where an addition of 11 million square feet of development is permitted beyond the 32 million sq foot cap contained in the 2017 Plan. (MMPA Working Draft Attachments, page 7-8);
- The three growth scenarios used in the analysis all assumed substantial increases in commercial development in Bethesda over the coming 20 years. In two of the areas in Bethesda over 70 percent of future development was assumed to be commercial. (MMPA Working Draft Attachments, page 5); and
- As a result of significant growth in commercial development, the analysis assumes that office employment growth in Bethesda will far exceed population growth (e.g., in scenario 3 -- which permits 21 million sq feet of development beyond the 32 million sq ft cap contained in the 2017 Plan -- by 2045 population grows by 16 percent while office employment grows by 60%). (MMPA Working Draft Attachments, page 7-8).

It's clear that the analysis which is used to support lifting the cap is fundamentally flawed. There is simply no way for population in Bethesda to shrink by 14 percent if 9 million sq ft of additional development is being built. While we might all hope that large-scale commercial development returns to Bethesda, it is unreasonable to assume that this will happen in a planning document.

One important implication of this flawed analysis is that the report's conclusion that school impacts from the three growth scenarios is also flawed. If, as reality suggests, far more of the

future development is residential, than the number of school children predicted in the report is substantially underestimated.

Given the questionable assumptions upon which lifting the cap rests, at a minimum, the County Council should require periodic, 5 year assessments of the impacts of development on the Bethesda Community. The Growth and Infrastructure Policy and school impact fees are effective on a project specific basis, but fail to capture the many community-wide public services that are critical elements of the Plan. A 5 year check in could provide valuable insights into the state of affordable housing, the utilization of bike lanes, the build out and use of parks, the shift to non-auto driver modal shares, and the need for additional classrooms.

I urge the Council to include in any action it takes periodic, 5 year assessments of the state of community-wide public services.

Master Plan Adequacy Test Inputs and Results

Staff developed three testing scenarios, corresponding to additional development beyond the 32.4 million square feet currently included in the Plan. Since these scenarios reflect density beyond that mapped to each site, the additional development was based on the approximate average annual Site Plan density approved since 2017 – one million square feet – extrapolated out to three potential “horizon years” when the Bethesda Downtown Plan would be revisited comprehensively. These horizon years are 2035, 2040, and 2045. It is important to note, however, that all model results reflect conditions at 2045 per the limits of the model. The three scenarios for additional density are:

- Scenario 1: 11 million square feet
- Scenario 2: 16 million square feet
- Scenario 3: 21 million square feet.

The overall density in each scenario was assigned to commercial or residential development based on the existing proportion, modified by growth factors developed by the Research and Strategic Projects team. The breakdown of commercial vs residential density by TAZ is:

TAZ	Commercial SF	Residential SF
637	48%	52%
3725	20%	80%
3726	72%	28%
3727	43%	57%
662	77%	23%
663	30%	70%

The model assumed no increase in single-family dwelling units and 1,000 square feet per multi-family dwelling unit. The overall density in each scenario was then distributed between the six Traffic Analysis Zones (TAZs) covering downtown Bethesda, shown in Figure 1 below.

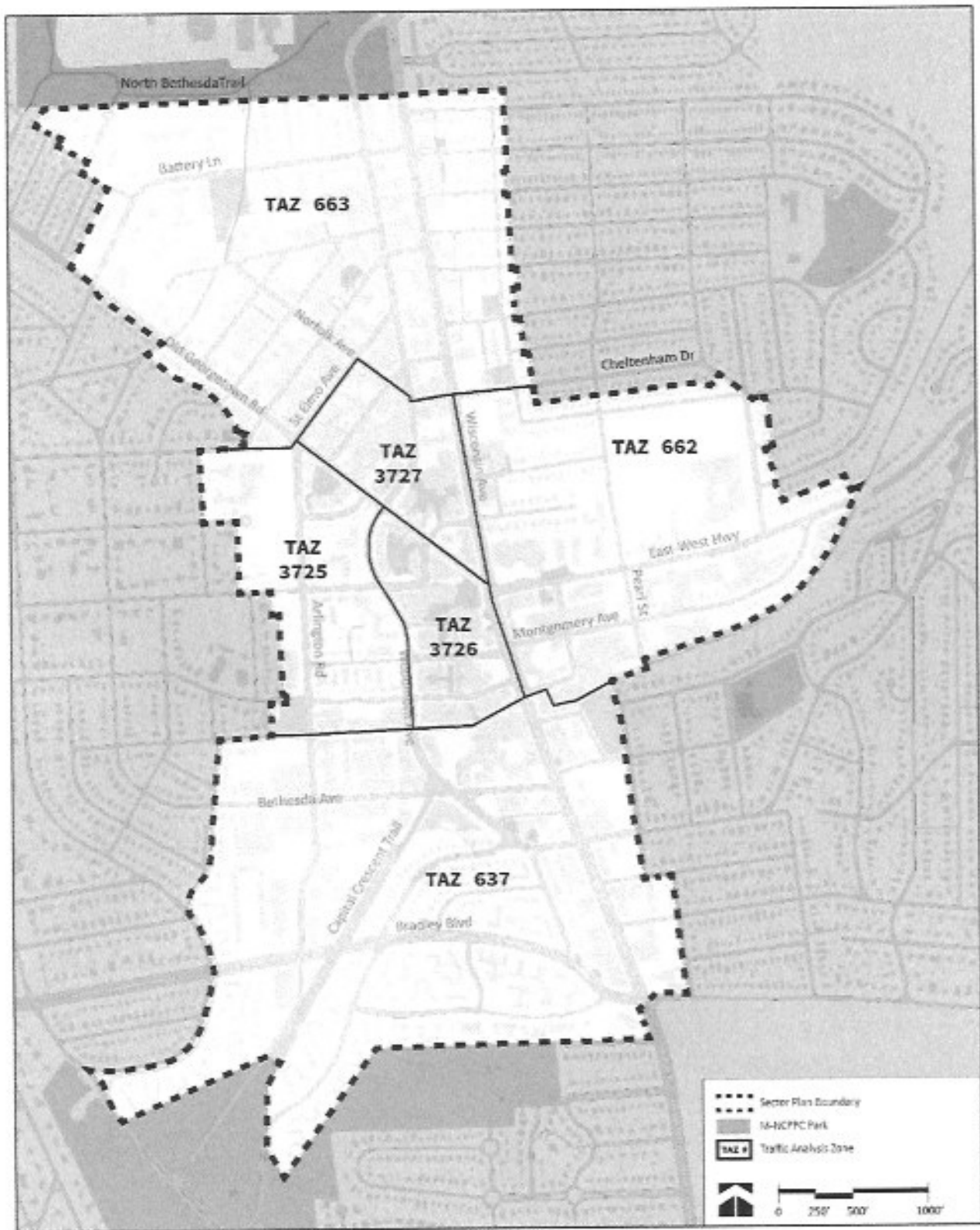


Figure 1. MMPA Plan Area TAZs

The inputs in Table 1 below use the following abbreviations:

HH	Households
HHPOP	Household Population
TOTEMP	Total Employment
INDEMP	Industrial Employment
RETEMP	Retail Employment
OFFEMP	Office Employment
OTHEMP	Other Employment

Table 1. MWCOG Model Inputs

2015							
TAZ	HH	HHPOP	TOTEMP	INDEMP	RETEMP	OFFEMP	OTHEMP
637	2,183	3,742	9,830	769	2,813	5,629	619
662	996	1,603	10,862	812	1,349	7,402	1,299
663	2,739	4,535	6,341	373	1,021	4,145	802
3725	586	944	2,400	203	216	1,739	242
3726	368	592	5,171	996	296	3,611	268
3727	233	375	3,143	135	315	2,498	195
Total:	7,105	11,791	37,747	3,288	6,010	25,024	3,425

2045 Baseline							
TAZ	HH	HHPOP	TOTEMP	INDEMP	RETEMP	OFFEMP	OTHEMP
637	4,160	7,455	7,816	700	2,878	3,568	670
662	2,508	4,464	14,010	567	1,451	10,248	1,744
663	6,563	11,774	5,800	356	2,280	2,017	1,147
3725	1,418	2,523	3,006	149	234	2,301	322
3726	927	1,650	6,384	687	328	5,020	349
3727	600	1,067	4,032	90	328	3,346	268
Total:	16,176	28,933	41,048	2,549	7,499	26,500	4,500

2045 Scenario 1							
TAZ	HH	HHPOP	TOTEMP	INDEMP	RETEMP	OFFEMP	OTHEMP
637	3,979	7,131	11,816	687	3,256	6,510	1,363
662	1,407	2,432	15,693	0	2,873	9,597	3,224
663	5,384	9,359	6,263	351	2,087	2,483	1,342
3725	1,730	3,007	3,329	1,471	238	1,240	380
3726	436	750	6,008	0	71	5,902	35
3727	1,232	2,140	4,032	0	227	3,805	0
Total:	14,168	24,839	47,141	2,509	8,752	29,536	6,344
	-12%	-14%	15%	-2%	17%	11%	41%

2045 Scenario 2							
TAZ	HH	HHPOP	TOTEMP	INDEMP	RETEMP	OFFEMP	OTHEMP
637	4,454	8,041	14,016	687	3,561	8,055	1,713
662	1,632	2,862	18,518	0	3,488	11,427	3,604
663	6,339	11,189	7,729	352	2,412	3,518	1,447
3725	2,030	3,582	3,601	1,473	288	1,415	425
3726	496	865	7,153	0	86	7,027	40
3727	1,477	2,630	4,807	0	277	4,530	0
Total:	16,428	29,169	55,824	2,512	10,112	35,971	7,229
	2%	1%	36%	-1%	35%	36%	61%

2045 Scenario 3							
TAZ	HH	HHPOP	TOTEMP	INDEMP	RETEMP	OFFEMP	OTHEMP
637	4,929	8,951	16,216	687	3,866	9,600	2,063
662	1,857	3,292	21,343	0	4,103	13,257	3,984
663	7,294	13,019	9,195	353	2,737	4,553	1,552
3725	2,330	4,157	3,873	1,475	338	1,590	470
3726	556	980	8,298	0	101	8,152	45
3727	1,722	3,100	5,582	0	327	5,255	0
Total:	18,688	33,499	64,507	2,515	11,472	42,406	8,114
	16%	16%	57%	-1%	53%	60%	80%

The results of the five-metric analysis of the output from the MWCOG model are in Table 2.