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**Testimony by the Town of Chevy Chase
Montgomery County Council
Public Hearing on Bethesda Downtown Plan Minor Master Plan Amendment
February 26, 2025**

The Town of Chevy Chase appreciates the opportunity to provide comments on the Bethesda Downtown Plan's Minor Master Plan Amendment (MMPA). My name is Stephanie Martz, and I serve on the Town of Chevy Chase Town Council.

The Town has consistently supported the Bethesda Downtown Plan's overarching goals for encouraging substantial growth in this dynamic area of the County, while improving residents' quality of life. However, the proposal to eliminate the development cap raises two key concerns.

- First, a significant portion of the development already approved remains unbuilt, leaving the impacts of the current development cap unknown.
- Second, the elimination of a comprehensive evaluation process for assessing whether the Bethesda Downtown Plan's objectives are being met as development increases. There will no longer be an opportunity to assess the impact of development on an aggregated basis across the entire footprint of the Plan; and no longer will there be the opportunity to develop timely recommendations to make any necessary adjustments to the Plan.

Recommendation for Periodic Comprehensive Reviews

To address these concerns, we recommend implementing periodic, data-driven, holistic reviews of the cumulative impacts of development projects, incorporating opportunities for community input.

While tools like site plan reviews for specific projects, monitoring reports, and the Growth & Infrastructure Policy (GIP) metrics are useful, they often provide isolated data points or operate at too broad a level to offer meaningful insights into the impacts on activity centers like Bethesda. In fact, the [2024 Bethesda Annual Monitoring Report](#), presented to the Planning Board on January 30, 2025, highlighted existing school capacity and traffic challenges within the downtown sector but provided no opportunity to discuss potential solutions.

For these reasons, residents are seeking periodic comprehensive reviews that enables broader recommendations beyond a project-by project review. This approach would involve establishing clear benchmarks, a baseline for current conditions, and a framework to assess progress in meeting key goals. These goals include maintaining acceptable school capacity, enhancing transportation options in red policy areas, creating parks, expanding affordable housing options, and fostering job creation – considered collectively. A comprehensive review would not only address residents’ concerns but also provide developers with greater predictability given Bethesda’s infrastructure needs.

The recent MMPA process underscores the importance of periodic reviews, especially as it brought several recommendations – such as increasing the Park Impact Payment (PIP) and eliminating the “use or lose” provision – to the forefront. These issues would not arise in project-specific reviews, monitoring reports, or through GIP metrics.

Future periodic reviews could raise other downtown-wide matters. For example, we share a goal of preserving affordable housing, but how is that being achieved in practice? What is the net change in the sum of naturally occurring affordable housing (NOAH) units and moderately priced dwelling units (MPDUs)? Additionally, a periodic, cumulative review process might explore whether, for example, a portion of the proposed increase in the Park Impact Payment (PIP) should be allocated to acquiring land for a recreation center.

Benefits to Periodic Comprehensive Reviews

We believe a holistic review process occurring every five years for Bethesda should be established if the County Council decides to remove the Bethesda Overlay Zone (BOZ) development cap. Such a process would enhance future decision-making on density and development as the underlying plan ages. If periodic reviews indicate that goals are not being met or that unintended consequences have emerged, adjustments could be made to align with the plan’s vision.

Conversely, if periodic reviews show that goals are being met effectively, they would still be helpful to guide future expansions or enhancements in amenities and infrastructure. Undertaking this effort every five years would leave adequate time to understand the impacts of longer-term developments, and we trust would be a manageable time frame for the Planning Department.

Another critical issue that could be monitored through comprehensive reviews is the validity of the MMPA’s current model projections. For example, the model projects that office employment will increase by 60% by 2045 under Scenario 3 - compared to the baseline of leaving the development cap in place. How accurate will these projections prove to be? Are these projections aligned with current work-from-home trends, or do they anticipate a major shift back to office-based work, leading to a significant increase in office space development in downtown Bethesda?

Additionally, the 2017 Bethesda Downtown Plan estimated 24% population growth over its 20-year horizon. But Bethesda's population increased 17% from 2017 to 2022 - even before most approved residential projects have been built. The MMPA models project a 16% increase under Scenario 3 but a 14% decrease under Scenario 1 (despite adding 9 million square feet of new development). Again, how accurate will the projections prove to be?

Indeed, the Trump administration's current and announced plans to make deep cuts to the federal workforce further demonstrate the need for periodic comprehensive reviews. These cuts are likely, for example, to frustrate assumptions on population growth in Bethesda that underlie the lifting of the cap. Planners cannot reasonably anticipate the inevitable and significant changes in circumstances that Bethesda will face in the coming years.

Residents and developers will benefit from periodic reviews of Bethesda's commercial and residential development and population growth using a transparent data driven approach that incorporates key metrics - spanning economic, environmental, and social factors. Such metrics must be systematically collected and effectively utilized to enable informed decision-making and necessary adjustments to the Plan.

Conclusion

Simply put, without comprehensive reviews, conducted every five years and in conjunction with community input, eliminating the development cap will eliminate the opportunity to comprehensively assess whether the plan is achieving the goals we all share; and to make necessary adjustments to ensure the Plan's success. We cannot expect that density alone, with only site by site reviews, drives balanced, responsible growth. We risk arriving at 2045, only to find that we're off track, and rue the missed opportunities to have achieved our goals.

Regular reviews, conducted every five years and based on updated data, would enable adaptive and responsive development policies. To this end, in addition to the metrics tracked in the monitoring report for the Bethesda Downtown Plan, we propose in the appendix a list of additional economic, social, infrastructure, accessibility, environmental, real estate development, economic equity, quality of life, and economic resilience data points for these holistic reviews. We recommend compiling this data now to establish a true baseline. Ideally, this approach could be applied County-wide, not just limited to Bethesda.

A data-driven review occurring every five years will build confidence that growth is being managed responsibly and in alignment with both current needs and future aspirations.

Thank you for considering these comments.

Bethesda Downtown Plan Review Report - Recommendations for Additional Metrics

1. Economic Metrics

- **Property Values:** Increases in property values can indicate higher demand and economic growth.
- **Business Revenue:** Tracking the growth of local businesses' revenue provides insight into economic vitality.
- **Retail and Office Space Occupancy Rates:** Higher occupancy rates suggest a healthy business environment.
- **New Business Creation**
- **Job Creation:** The number of new jobs generated in the downtown area.
- **Wage Growth**
- **Sales Tax Revenue:** An increase in sales tax revenue can indicate higher consumer activity.

2. Social Metrics

- **Projected Population of Downtown Bethesda**
- **Foot Traffic and Visitor Counts:** Monitoring the number of people visiting the downtown area.
- **Diversity of Users:** Ensuring a mix of demographics (age, income levels) to indicate broad-based community use.
- **Public Safety Statistics:** Changes in crime rates or the perception of safety by residents.
- **Community Satisfaction Surveys:** Feedback from residents and visitors regarding their experiences.
- **Cultural and Recreational Activities:** The number and variety of events, festivals, and activities hosted in the area.
- **Elementary School Capacity**

3. Infrastructure and Accessibility Metrics

- **Impact on Traffic from Residential vs. Commercial Density**
- **Traffic Flow & Stop Time by Time Bands**
- **Public Transportation Usage:** Increased use can indicate better accessibility.
- **Pedestrian and Bike Traffic:** Higher levels suggest a walkable, eco-friendly downtown
- **Sidewalk expansion projects (linear feet)**
- **Sidewalk blockages due to construction (linear feet)**
- **Bethesda Metro Entries/Exits by Line (Red vs. Purple)**
- **Parking Availability and Usage:** Optimal usage of parking structures without overuse or severe shortages.
- **Condition of Roads and Public Spaces:** Regular assessments to check the maintenance and appeal of public areas.
- **Storm Water Management:** Increased growth requires analysis of storm water drainage inlets and retention/detention of rainwater.

4. Environmental Metrics

- **Green Space Coverage:** The number of parks and open spaces as well as metrics towards protecting and increasing the tree canopy.
- **Land Acquisitions for Parks (Number and Dollar Amount Spent)**

- **Number of Parks in Pipeline/Constructed**
- **Energy Efficiency:** Adoption of renewable energy sources and green building certifications.
- **Waste Management Efficiency:** The effectiveness of recycling programs and waste reduction initiatives.

5. Real Estate Development Metrics

- **Number of New Developments:** Tracking new residential, commercial, and mixed-use projects and tying increases to the other metrics listed herein.
- **Residential Development Square Footage (Since Last Review)**
 - Number of residential units in pipeline and constructed.
 - Price bands and types of residential units constructed.
 - Goal of price bands per type.
 - NOAH properties and MPDU developments.
 - Types of residence ownership (Private Equity, LLC, Owner).
- **Commercial development square footage (since last review)** of Development fees collected.
 - Where County Allocated Development Fees
- **Ratio of Affordable Housing Units:** To ensure inclusive growth.
- **Adaptive Reuse Projects:** The number of old buildings repurposed instead of demolished.

6. Economic Equity Metrics

- **Displacement Rates:** Monitoring changes in the resident population to avoid gentrification without community benefit.

7. Quality of Life Metrics

- **Access to Essential Services:** Proximity to healthcare, education, and grocery stores.
- **Walkability and Livability Scores:** Based on frameworks like the Walk Score.
- **Public Space Utilization:** Frequency of use and user satisfaction with parks and plazas.

8. Economic Resilience Metrics

- **Diversity of Business Types:** Ensures that the downtown is not dependent on a single industry.
- **Vacancy Rates:** Measuring how long commercial and residential spaces remain vacant.
- **Rate of Business Closures:** Lower rates can indicate a thriving economy.

9. Lessons Learned

- **Commercial Development Trends** (e.g., Lease Agreements, Work from Home Policies)
- **Post-COVID Stability of Commercial & Residential Development**
- **Residential Development by Type** (Comparisons to other parts of the County)
- **Trends in School Capacity**
- **Trends in Transportation Capacity**

10. Recommendations for Improving/Adjusting Bethesda Downtown Plan