

February 24, 2025

Kate Stewart, President
Montgomery County Council
100 Maryland Avenue
Rockville, MD 20850

Re: 2/26/2025 Public Hearing on the Planning Board's Draft of the Bethesda Downtown Plan Minor Master Plan Amendment

Dear Council President Stewart, Vice President Jawando, and Councilmembers Albornoz, Glass, Sayles, Balcombe, Fani-González, Friedson, Katz, Luedtke, and Mink:

On behalf of the Wildwood Manor Citizens Association (WMCA), I am writing to provide our comments on the Maryland-National Capital Park and Planning Commission's (M-NCPPC) December 2024 Bethesda Downtown Plan Minor Master Plan Amendment (MMPA) Planning Board Draft.¹ WMCA represents more than 500 Bethesda homes located just east of MD 187 and bordered by I-270 on the North, Snow Point Drive on the East, and Grosvenor Lane and Southport Drive on the South. **As residents who live, work, shop, dine, and play in Bethesda, we strongly oppose the proposed elimination of the development level² which would allow even more residential and commercial development in Downtown Bethesda.** Our specific concerns and comments on the proposal are detailed below:

Removal of the Development Cap is Not a Minor Amendment, Goes Beyond the Scope of a MMPA, and Should Not Be Allowed

In describing the MMPA process, M-NCPPC explains that “[t]he plan included a cap on total development in downtown Bethesda, including existing and approved new development. The County Council has authorized Montgomery Planning to develop a Minor Master Plan Amendment (MMPA) to the 2017 plan to focus on **implementation** (emphasis added) . . . The MMPA will cover the same Plan Area as the 2017 plan. It will not re-open the entire 2017 plan: the existing zoning, parks, transportation, and other **recommendations will remain unchanged** while we explore how better to **implement** those recommendations (emphasis added).”³

Rather than focusing on implementation of the 2017 Bethesda Downtown Plan, M-NCPPC's proposal to remove the development cap inappropriately changes the key component around

¹ Maryland-National Capital Park and Planning Commission (M-NCPPC). (2024, December). *Bethesda Downtown Plan Minor Master Plan Amendment Planning Board Draft* (hereinafter “MMPA”). Available at: <https://montgomeryplanning.org/wp-content/uploads/2024/12/Bethesda-Downtown-Plan-Minor-Master-Plan-Amendment-Planning-Board-Draft-20241219-FINAL-web.pdf>

² Id. at p. 6.

³ M-NCPPC. (2024). *Bethesda Downtown Plan Minor Master Plan Amendment* (2024). Available at: <https://montgomeryplanning.org/planning/communities/downcounty/bethesda-downtown-plan/bethesda-downtown-plan-minor-master-plan-amendment-2024/>

which the Plan was designed – namely, the establishment of a 32.4 million square feet development cap⁴ that balances new commercial and residential development with the need for corresponding public amenities, parks, and green spaces for residents, workers, and visitors to Downtown Bethesda. As the Bethesda Downtown Plan notes, “Adding more density to an already densely built environment requires more parks, trails and open space located in the right places to make sure Bethesda remains a place where people want to live, work and play.”⁵ To realize the goals of the Bethesda Downtown Plan, it is critical to retain the development cap.

Removal of the Development Cap would Result in Unacceptable Increases in Greenhouse Gas Emissions

WMCA opposes any increases beyond the 32.4 million square feet development cap due to harms to the environment from increases in greenhouse gas (GHG) emissions. As M-NCPPC’s *Climate Assessment* found, all three tested scenarios resulted in significantly increased GHG emissions.⁶ Specifically, “[t]he overall GHG emissions increase for Scenario 1 (11 million additional sq/ft) will be approximately 34%. GHG emissions increase for Scenario 2 (16 million additional sq/ft) will be 53.58%. GHG emissions for Scenario 3 (21 million additional sq/ft) will be 73.50%.”⁷ Complete removal of the development cap would result in even more harmful GHG emission levels, contrary to the County’s *Climate Action Plan*, which seeks to reduce GHG emissions 80% by 2027 and 100% by 2035 compared to 2005 levels.⁸

Removal of the Development Cap would Exacerbate Traffic Congestion and Negatively Impact Emergency Response Times

WMCA opposes any increases beyond the 32.4 million square feet development cap because the resulting population increases would “result in greater traffic and congestion to adjacent neighborhoods, shopping areas, work, and other regional communities. . . .”⁹ While the MMPA describes “modest increases (around two minutes) for travel times from projected increases in job creation in the downtown,”¹⁰ WMCA believes that these increases in travel times are actually significant -- not modest. M-NCPPC should consider the impacts to traffic congestion and travel times along MD 187 and MD 355 as a whole, not just in the Bethesda Downtown Plan area.

⁴ Maryland-National Capital Park and Planning Commission (M-NCPPC). (2017, May). *Bethesda Downtown Plan Approved and Adopted May 2017* (hereinafter “Bethesda Downtown Plan”), p. 6. Available at: https://montgomeryplanning.org/wp-content/uploads/2017/09/BDP-COUNCIL-ADOPTED-MAY2017_SMALL-FOR-WEB.pdf

⁵ Id. at p. 76.

⁶ M-NCPPC. (2024, October). *CLIMATE ASSESSMENT FOR BETHESDA DOWNTOWN MINOR MASTER PLAN AMENDMENT WORKING DRAFT* (hereinafter “*Climate Assessment*”), p. 2. Available at: <https://montgomeryplanning.org/wp-content/uploads/2024/10/Bethesda-Downtown-Plan-Minor-Master-Plan-Amendment-Public-Hearing-Draft-Attachments-20241028-FINAL.pdf> (pp. 14-28).

⁷ Id.

⁸ Montgomery County, Maryland Government. (2021, June). *MONTGOMERY COUNTY CLIMATE ACTION PLAN* (hereinafter “*Climate Action Plan*”), p. xix. Available at: <https://www.montgomerycountymd.gov/climate/Resources/Files/climate/climate-action-plan.pdf>

⁹ *Climate Assessment* at p. 6.

¹⁰ *MMPA* at p. 12.

For example, the Maryland Department of Transportation State Highway Administration's (MDOT SHA) October 2024 report to the Maryland General Assembly on the impact of the installation of the bike lanes on MD 187 between Ryland Drive and Tilden Lane found that northbound "PM peak period travel times have increased up to 40% since the installation of the bike lanes."¹¹ In addition, northbound travel times have increased starting at 2:00 PM through about 8:00 PM, as well as between 7:00 AM and about 9:30 AM compared to pre-installation travel times¹² -- impacting traffic far more than just at peak hour. Southbound, post-bike lane installation travel times increased beginning at about 8:00 AM through about 5:00 PM -- a period of 9 hours.¹³ These increases in reported travel times are only for the portion of MD 187 between Ryland Drive and Tilden Lane, not south of Ryland Drive to the Bethesda Downtown Plan area.

Additional increases in travel times that would result from the proposed lifting of the development cap are also worrisome due to the negative impact traffic congestion has on timely access to Suburban Hospital -- the designated trauma center for Montgomery County¹⁴ -- and the ability of emergency medical, fire, rescue, and police vehicles to reach neighboring communities as well as I-495 and I-270 in a timely manner.

The Development Cap Should Not be Raised Without Confirmation that Infrastructure, including Schools, Can Accommodate New Development

If, despite the concerns noted above, the County Council decides to raise the development level beyond the cap of 32.4 million square feet, the County and/or M-NCPPC needs to provide confirmation from the relevant utility companies and departments that the water, sewer, electrical, and broadband infrastructure, stormwater management, transportation, and roads will be sufficient to accommodate new development.

In addition, the County/M-NCPPC needs to ensure that school capacity is sufficient to support any proposed new development. For example, Bethesda Elementary School has a current enrollment of 645 students,¹⁵ which is 115% of its capacity of 561 students.¹⁶ New residential development in Downtown Bethesda will generate even more students that will further strain Bethesda Elementary and the Bethesda-Chevy Chase Cluster schools.

¹¹ Maryland Department of Transportation State Highway Administration (MDOT SHA). (2024, October). *Information Related to Bike Lanes on Old Georgetown Road (MD 187): A Report for the Maryland General Assembly Senate Budget and Taxation Committee and House Appropriations Committee*, p. 5.

¹² Id., Figure 3 at p. 5.

¹³ Id. Figure 4 at p. 5.

¹⁴ Johns Hopkins Medicine/Suburban Hospital. (2025). *About Suburban Hospital*. Available at: https://www.hopkinsmedicine.org/suburban_hospital/about_the_hospital/index.html

¹⁵ Montgomery County Public Schools (MCPS) Data Dashboards. (2025). Learning, Accountability and Results: Enrollment, Individual Measures, Bethesda Elementary School. Available at: <https://www2.montgomeryschoolsmd.org/data/LAR-charts/enrollment.html>

¹⁶ M-NCPPC. (2025). Growth & Infrastructure Policy: FY 2025 School Utilization Report, p. 100. Available at: https://montgomeryplanning.org/wp-content/uploads/2024/06/FY25_UtilizationReport.pdf

Any Increases in the Development Cap Should be Tied to the Delivery of Public Amenities and Parks

Furthermore, any increases in the density level should be tied to the delivery of public amenities and parks. As M-NCPPC's Preliminary Recommendations presentation notes, while many new buildings have been completed in Downtown Bethesda since 2017, there has not been as many new public amenities, and no new parks have been completed.¹⁷ We agree with our neighbors in Chevy Chase that any increases in density should be "contingent on the submission of a detailed plan outlining the delivery of amenities promised in the [Bethesda Downtown] Plan."¹⁸ Otherwise, there will only be more development without concrete public amenities, parks, and green spaces for the residents of Downtown Bethesda and neighboring communities.

Conclusion

WMCA strongly opposes the proposed elimination of the Bethesda Downtown Plan's development cap because it inappropriately goes beyond the scope of a MMPA, would significantly increase GHG emissions, further exacerbate traffic congestion, have other negative impacts, and threaten the goals of the Bethesda Downtown Plan.

Before any new development beyond the cap of 32.4 million square feet is contemplated, M-NCPPC needs to provide confirmation that infrastructure, including school capacity, will be sufficient to accommodate new development. Any increases in the development level should be tied to the delivery of public amenities, parks, and green spaces.

Thank you for your consideration of our comments and concerns.

Sincerely,

Karin Bolte

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¹⁷ M-NCPPC. (2024, Summer). *Bethesda Minor Master Plan Amendment Preliminary Recommendations presentation*, p. 9. Available at: <https://montgomeryplanning.org/wp-content/uploads/2024/09/BMMPA-Preliminary-Recommendations-Presentation.pdf>.

¹⁸ Lane, Irene N. Letter to Chair Harris and Members of the Montgomery Planning Board. 19 September 2024. Available at: <https://montgomeryplanningboard.org/wp-content/uploads/2024/09/MCPB-9.19.24-Item-6-Correspondence-Bethesda-Downtown-Plan-Minor-Master-Plan-Amendment-Preliminary-Recommendations.pdf> (pp. 25-27).

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