

March 19, 2026  
7512 Royal Dominion Drive  
Bethesda, Maryland 20817

27(j) (j)  
CBA-1174-E

Montgomery County Office of Zoning and Administrative Hearings  
100 Maryland Avenue, Room 200  
Rockville, Maryland 20850

Re: Holton Arms Expansion (Case No CBA-1174-E)

Dear Mesdames and Sirs,

My name is Wendy J. Miller and I live at 7512 Royal Dominion Drive in the Al Marah neighborhood directly across River Road from the Holton-Arms School (Holton-Arms). I am writing in continued opposition to the Holton-Arms Expansion. This is a supplement to my comments of September 22, 2025 (enclosed for your convenience), in response to a new matter raised in the March 3, 2026 filing by Holton-Arms. Please post all my comments.

I would like to address one supplemental change to the proposed expansion: the planned use of the site of the Primary Day School for overflow parking when an expanded Holton-Arms facility is rented out on weekdays and weekends to third-party users. The Primary Day School is located on the Al Marah side of River Road and directly adjoins our neighborhood. What better evidence could there be that the proposed expansion is both irrational and unfair to the neighborhood of Al Marah: the property currently occupied by Holton-Arms is simply unable to support the proposed new commercial functions of the expanded school. Furthermore, the parking lot at the Primary Day School is not large. During functions at the school, overflow attendees park along both sides of Royal Dominion Drive, the primary route into the neighborhood of Al Marah, creating a dangerously narrowed point of entry to the neighborhood and very limited use of the road for pedestrians. If the currently proposed Holton-Arms expansion is permitted to go forward, Al Marah residents will be subjected to this extraordinary threat to public safety conceivably every weeknight and weekend. No resident of Montgomery County, Maryland should be required to live like this, through a zoning change far surpassing the original zoning of Holton-Arms.

Please disapprove the proposed expansion of Holton-Arms for the reasons that I have articulated as well as those of other opposing commenters. Our quality of life depends on it.

Sincerely,



Wendy J. Miller

Enclosure

September 22, 2025  
7512 Royal Dominion Drive  
Bethesda, Maryland 20817

Montgomery County Office of Zoning and Administrative Hearings  
100 Maryland Avenue, Room 200  
Rockville, Maryland 20850

Re: Holton-Arms Expansion (Case No CBA-1174-E)

Dear Mesdames and Sirs,

My name is Wendy Miller. I live at 7512 Royal Dominion Drive in the Al Marah neighborhood directly across River Road from the Holton-Arms School (Holton-Arms). I am writing in opposition to the Holton-Arms Expansion (Case No. CBA-1174-E). I appreciate your consideration of my views. I also appreciate the postponements of consideration of this application to a reasonable time, due partially, I understand, to the school's failure to notify my neighborhood of its plans in accordance with local rules. My neighborhood is directly and extremely negatively impacted by this application.

Holton-Arms is seeking approval for a 30% increase in their enrollment to 870 students, along with an even greater summer camp increase in enrollment to 970 students. It also plans to expand third-party use of their facilities outside of school hours for fees. Since at least 1982, Holton-Arms has had residential zoning of R-200 and R-90 and has only been permitted by the county to operate as a private school under special exception. Over the course of several decades, Holton-Arms has applied for a series of special exemptions allowing creeping substantial growth in its enrollment to the present enrollment cap of 665 students plus 5 students, along with a summer camp enrollment of up to 670 campers. The most recent special exemption specifically required the only exit and entrance to the school to be at River Road (in order to protect other neighborhoods, I am told).

Al Marah was established in the late 1970s and sits directly across River Road from Holton-Arms. There are only two entrances to the community at Bradley Boulevard and Royal Dominion Drive, at successive traffic lights. Entrance to Holton-Arms is on the other side of River Road at Royal Dominion Drive. There is also a private elementary school, the Primary Day School, which is located to the left of Royal Dominion Drive at that entrance to the community. That school also contributes traffic to the intersection of River Road and Royal Dominion Drive, of course.

The current operation of Holton-Arms has already impacted the Al Marah community, reducing the quality of life, public safety, and property values. There are always bottlenecks from greatly increased traffic at Royal Dominion Drive. Further, some parents dropping off students to the school grow frustrated with that and rather than making the more difficult left turn into the school at Royal Dominion Drive, opt to enter our neighborhood at the Bradley light and travel the loop through the neighborhood to enter the school by a straight-shot across River Road at Royal Dominion Drive. This impact of course is made worse by the drop-off traffic for

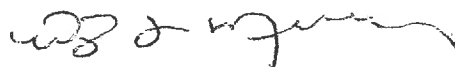
the Primary Day School also entering the neighborhood at Royal Dominion Drive. Increasing the enrollment for Holton-Arms by 30% will greatly exacerbate this problem. Please do not approve the expansion to allow it.

Granting yet-another special exemption—especially one allowing a substantial 30% increase in enrollment—is exceedingly unfair to Al Marah, which has borne the brunt of earlier expansions by the limitation of entrance to the school at River Road. Further, continued granting of special exemptions as has occurred over the past decades makes a mockery of the underlying residential zoning on which livability along River Road depends. As noted, Al Marah was established in the 1970s and homeowners then and later purchased their properties with the reasonable expectation that the zoning was not commercial. While it is laudable that the new current management of Holton-Arms has lofty goals and seeks to offer the benefits of the school to a larger population of young women, quite simply this has reached the point at which the school needs to relocate to achieve any more aggressive enrollment goals.

While I do not support this approach to this application (because it relies on self-policing), I understand that other private schools in the area—such as the Potomac School, McLean School, French International School, and Field School—have been required to go to mandatory busing or other actions as conditions for special exemption to expand further. That would reduce regular traffic in the area if a decision is made that the special exemption must be granted. I would note the following, however. On Tuesday, September 9, 2025, I participated in a hearing that Holton-Arms held regarding the expansion. During that hearing, the school management presented a traffic reduction incentives plan that they will submit as part of their application. I was disappointed then to hear that the school, unlike those other local private schools, is unwilling to require of its students, their families, staff, and planned third-party users of the facilities, any enforceable limitations in the form of the number of vehicles, carpooling, or bus usage. The school is also unwilling to link increments of expansion of the school over time to the success of its toothless incentives. The one strategy that the school is willing to employ--construction of a left-turn lane out of the school--does not seem likely to alleviate heightened traffic and could increase delays for other users of River Road, including residents of Al Marah. This is not the attitude of an applicant meriting a granted application to the great detriment of my neighborhood.

Thanks for your attention to this matter and consideration of my views. Please do not grant this request for expansion. Life in Al Marah depends on it.

Sincerely,



Wendy J. Miller