

**From:** [Richard Erdman](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Richard Erdman](#)  
**Subject:** Dec. 2 meeting on Single Family Zoning Cap  
**Date:** Wednesday, November 27, 2024 12:35:28 PM

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[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

My wife Sibyl and I reside at 5202 Murray road in the Brookdale subdivision of Chevy Chase. With a view to the upcoming December 2 Planning Board meeting to discuss the proposal/recommendation to lift the single family zoning cap in much of the county, including in Brookdale, we want to register our strong objections to this ill-considered idea.

We are not Neanderthals. We recognize that a shortage of affordable housing is a nation-wide problem, that ways must be found to provide more low-cost housing, and that denser housing in some neighborhoods near major arteries and transportation hubs will inevitably have to be part of the solution. But we strongly reject the idea that long-established, well-defined neighborhoods should be disrupted, especially when, as in the case of Brookdale, land on the borders of the neighborhood could easily support the construction of taller, multi-family structures. I have in mind the Geico and the Lord & Taylor properties (the latter of course is in the District). Once you destroy the character of a historic, quiet, leafy neighborhood, it will be gone forever.

Other specific objections are:

— the Planning staff recommendations are disingenuous in referring to “attainable” housing. The latter is a vague euphemism that everyone knows was selected because the notion of “affordable” housing is clearly a non-starter in this high-cost area.

—disrupting a small neighborhood like Brookdale with multi-family housing will at best add only a few housing units, doing little to address a problem that could best be addressed by focusing multi-family construction on areas adjacent to existing neighborhoods or areas on main arteries where high-rise buildings already exist.

—the Planning staff has been disingenuous in the way it has downplayed, misrepresented, and distorted the extent and level of neighborhood opposition to their proposals. The fact that the proposals are being put forward by people who have no direct connection, emotional attachment, or interest in Brookdale and who stand nothing to lose by advancing such destructive proposals is as shocking as it is unsurprising.

—we are not experts, but our understanding is that housing vacancy rates in the area are not insignificant, and this calls into question the need for a drastic step such as destroying the character and heart of an older neighborhood, especially when there is potential for substantial construction on the edges of that neighborhood.

—the fact that the proposals under consideration do not require adequate parking for new units also means that our neighborhood streets will become more crowded with cars, less walkable for children and older folks like ourselves, and less safe. Such a proposal would only increase profitability for developers, not affordability for home-seekers.

In closing, we urge the Planning Board in strongest terms to reject the ill-considered, disruptive, “one-size fits all” recommendations that would permit multi-family housing in the heart of existing neighborhoods.

Sincerely,

Sibyl N. Erdman  
Richard W. Erdman

5202 Murray Road  
Chevy Chase, M20815

**From:** [Lorena Cano](#)  
**To:** [MCP-Chair](#)  
**Subject:** WRITTEN TESTIMONY FOR Item 1 – Bethesda Downtown Plan Minor Master Plan Amendment, Date December 2  
**Date:** Wednesday, November 27, 2024 12:10:31 PM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Hi all,

Increasing the number of middle and low income housing units and families in a traditionally safe area can have several unintended consequences. Firstly, there may be concerns about safety. An influx of new residents can strain local law enforcement and emergency services, potentially leading to longer response times and increased crime rates if resources are not adequately scaled. As we can see it in downtown DC.

Secondly, traffic congestion is likely to rise. More residents mean more vehicles on the road, which can lead to increased traffic jams, longer commute times, and a higher risk of accidents. This can also put additional pressure on public transportation systems, which may not be equipped to handle the sudden increase in demand.

Lastly, environmental contamination could become a significant issue. Higher population density can lead to more waste production, which, if not managed properly, can result in pollution of local water sources and green spaces. Additionally, increased vehicle emissions can degrade air quality, posing health risks to all residents.

While the goal of providing affordable housing is commendable, it is crucial to address these potential challenges through careful urban planning and resource allocation to ensure the well-being of all community members.

Thank you  
Lorena Cano

**From:** [Richard Hoyer](#)  
**To:** [MCP-Chair](#)  
**Subject:** Item 1 Bethesda Minor Master Plan Public Hearing, December 2, 2024  
**Date:** Wednesday, November 27, 2024 12:00:52 PM

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[EXTERNAL EMAIL] Exercise caution when opening attachments, clicking links, or responding.

Dear Chairman Harris and fellow Commissioners,

I thank you for your service and for this opportunity to provide comments on the Bethesda Minor Master Plan Amendment.

I was introduced to Bethesda when my parents drove me from our house on Hilltop Road in Silver Spring to the Lafayette Electronics store on Rugby Avenue in the northern area of the Plan. I was a riding scholar at Silver Spring Elementary school and fascinated with the world of electronics. That was before the Beltway was completed and Rugby Avenue was a gravel road. Having experienced the rolling ride on East-West Highway from the back seat I thought we had arrived near the end of the civilized world. Today, as a 40 year resident of Bethesda, I am convinced that the urbanity only partially completed in Bethesda is a vital component to the highest quality of life obtainable and a necessary “growth plate” of our County. Like sea ports the world over, the crossroads and mass transit that is Bethesda provide the unique place where the wealth of ideas, diverse outlooks and customs and private wealth can interact in the creative process of city building.

I am very concerned that the work of this MMPA is too constrained and over emphasizes the-needed- parks and open spaces over the pedestrian realm of the road and non-vehicular network Bethesda has and should expand.

I support or recommend the following:

Remove the Density Cap on Bethesda.

- Reduce posted speed limits through the Plan area , 20 mph for major roads and 15 mph for minor roads.
- Redesign the road cross-sections and intersections to make target speeds consistent with the lowered posted speed limits.
- Design a daylighting plan for all intersections and mid-block crosswalks to maintain clear sight-lines by reclaiming sidewalk space from pavement adjacent to the marked: “No Stopping” areas.
- Design a plan for continuous sidewalks throughout the plan area and into adjacent neighborhoods.
- Redesign intersections with a platform design.
- Make a plan that provides for “Double Loading” sidewalks with tree plantings and urban amenities-in part through narrowed travel lanes. This, for major boulevard-style roads like Wisconsin Avenue, Old Georgetown Road and for Arlington Roads, among many others.
- Redesign intersections and circulation patterns on roads to reduce pedestrian crossing distances. Such places as Arlington Road and Elm street need a turn lanes removed and retail car entrances freed from turn restrictions.
- Design a plan to make the Metro Bus Bays and the immediate surrounding blocks into a “Union Station” style experience and enhanced pedestrian functionality.
- Study and design a completely new intersection at the five way Old Georgetown Road, Wilson Lane, Arlington Road, St. Elmo Road Intersection for shortened pedestrian crossings and better vehicular flow.
- Redesign the intersection by Veteran’s Park at Woodmont and Norfolk Avenues into two separate intersections with an oblong traffic island.
- Create a street scape and land use design for Arlington Road that defines a new Civic Boulevard where a new community center, new library, new elementary school and recreation center can be located with additional residential housing and retail services.
- Study and incorporate the redesign needed to make a one mile radius walk shed for Bethesda Elementary School possible-bus service is currently required for students living on the east side of Old Georgetown Road.
- extend the road beside Battery. Lane Park to connect with Battery Lane.
- create a park from the cul-de-sac of North Brook Lane
- prioritize new housing over keeping naturally occurring housing.
- require naturally occurring affordable housing to have pedestrian and bicycle upgrades.

Thank you,

Richard Hoyer

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Sent from my iPad

**From:** [Stacey Band](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Stacey Band](#)  
**Subject:** COMMENTS: Bethesda Minor Master Plan Amendment, December 2, 2024  
**Date:** Wednesday, November 27, 2024 12:00:18 PM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Planning Board Chair Harris and Planning Board Members:

The Planning Board's so-called "minor" amendment is a misnomer and has major implications for Bethesda and the surrounding localities. Bethesda is the focus for shopping, eating and working for many of our residents. The potential negative impact of unlimited density in Bethesda is a concern for our community. This proposal is also coming at a time of great potential upheaval for the entire metropolitan area. Anticipated cutbacks in government employment promised by the incoming administration would have a ripple effect on all of Montgomery County and its growth. In addition, one of downtown

Bethesda's major employers, Marriott, has already announced it is laying off 800 workers. We respectfully request that the Planning Board perform much needed impact analyses, provide the resulting data to the public to allow for meaningful community input, and make any appropriate changes before moving forward with this proposed major adjustment to the density cap.

First, the County must make good on the promises of the 2017 Master Plan before eliminating the cap. All too often, Montgomery County is playing catch-up with public facilities and amenities. We still do not have a running Purple Line or many of the parks or other transit proposed in the initial 2017 Master Plan. With those promises and needs still unmet, it is irresponsible to encumber the County with more commitments without careful analysis and more public discussion.

It takes years for schools to be built, for parkland to be acquired, and for public transit routes to be designed much less built, yet the proposed map amendment offers no contingent metric for frequent, periodic assessment (not just monitoring) of the status of growth so that all the necessary improvements can be made.

Related to this, we are concerned that the proposed map amendment calls for allowing the Park Impact Payments (PIP) to slide and not be paid up front with a building permit. That recommendation seems to guarantee that we will once again be playing catchup on parks as we will not have the funding.

Second, the County must provide the public with detailed metrics on the impact of eliminating the cap, such as:

Maps detailing where the new density would be located; Population estimates of how many additional residents would be moving in, including school-aged children. The report from the Planning Board on the map amendment quotes projections by MCPS that only go through 2029-30, but the plan goes through 2045. Moreover, the school

district is already shifting boundaries and there is the very real possibility that more schools will shift, complicating projections at this point in time;

A comprehensive analysis of commercial vacancy rates across all building classifications, to ascertain which areas might be ripe for conversion of residential units at a lower price point instead of possibly more costly demolition and more new high rise construction;

An examination of the viability of the public utilities and the county stormwater management systems to support unlimited this additional square footage; and Measurement of the transportation system's ability to withstand unlimited, unchecked growth. Once measured, there must be concerted coordination between the Planning Board and the State Highway Administration, as the major arteries in the Bethesda Plan (Routes 355 and 187) are state roads. Relatedly, there should be an analysis on the spillover effect onto other state roads like Connecticut Avenue as density is built up in Bethesda.

Congestion is obviously a current problem. Significant commercial, residential, and school-related loading and unloading issues are an everyday reality across all of Bethesda. More Bethesda density would mean more congestion for a system that cannot handle the current density. Eliminating the cap before making a concerted effort to analyze these impacts is a prescription for failure.

Finally, the County should take this opportunity to improve the availability of both affordable and truly "attainable" housing in the Bethesda Master Plan. As a key initiative of the Planning Board, it is striking that there has been no effort to incorporate truly "attainable" (let alone truly affordable) housing and different housing types into the existing Master Plan. The Planning Board's most recent progress report on the Bethesda Plan points out that "the average monthly rent increased 23%, with about 46% of renters spending more than 30% of their income on rent, a 30% increase." It seems that HOC is mainly doing this actual work.

The Council also found that "Downtown Bethesda has less racial diversity than the county as a whole, but since 2017 the proportion of non-white residents has increased from 27% to 33%. Asians are the largest group among people of color, with Black, Asian, and Latino populations growing 31%, 54%, and 18% respectively. Average income increased 27% to almost \$185,000, as compared with the county average \$173,000. Average house value increased 23%."

In short, the expanded Bethesda Plan would provide more housing (including more MDPU's), but the diverse housing types and price points that would appeal to diverse income levels and races are absent. The lack of any emphasis on middle-income housing strikes us as cognitive dissonance.

This plan to expand density offers more of the same thing which the Planning Board has said they do not want at the same time the Board is promoting the concept of "attainable" housing higher cost housing for higher income residents. Review of the Bethesda Master Plan seems like a missed opportunity to create a comprehensive plan to provide housing for all saying the plan will make efforts to preserve naturally occurring affordable housing is not enough.

We urge the Planning Board to develop these methods of analysis along with population projections and density maps to allow the County to maintain control of a true Master Plan. It is difficult to imagine a workable master plan with unlimited density without a set of contingent metrics to rein in growth if we cannot provide full amenities and diverse housing for all income levels in a timely manner.

Stacey Band, MPA  
BHC Secretary and Community Liaison  
CCCCFH Executive Committee Member  
Bethesda IAC Member  
MCCF Delegate  
Residents South of Bradley Listserv

[stacydwolf@gmail.com](mailto:stacydwolf@gmail.com)

**From:** [Dedun Ingram](#)  
**To:** [MCP-Chair](#)  
**Subject:** Comments on Bethesda Downtown Minor Master Plan ammendment Recommendations  
**Date:** Wednesday, November 27, 2024 11:50:50 AM  
**Attachments:** [Comments BethesdaDowntown MMPA Recommendations 11 26 2024.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Mr. Artie Harris, Chair  
And Members of the Planning Board  
Montgomery County Planning Board  
2425 Reddie Drive, 14th Floor  
Wheaton, Maryland 20902

Dear Chair Harris:

My comments are attached.

Thank you for your consideration.

Dedun Ingram  
4312 Willow Lane  
Chevy Chase, MD 2081t



Mr. Artie Harris, Chair  
And Members of the Planning Board  
Montgomery County Planning Board  
2425 Reedie Drive, 14th Floor  
Wheaton, Maryland 20902  
Re Comments on the Bethesda Downtown Minor Master Plan amendment  
Recommendations

November 25, 2024

Montgomery County Planning Board Chair Harris and Members of the Planning Board:

It seems inevitable that Bethesda's development cap of 32.4 million square feet will be removed. But before that is done, I urge the Planning Board to do its due diligence and require that additional analyses be done to assess the five transportation metrics now used to evaluate the viability of master plans. Additionally, the inaccuracies and errors in the public hearing draft of the recommendations need to be corrected and more substantive descriptions of the current state of Bethesda, the data sources and the analyses conducted to determine that the development cap could be not only raised but removed, should be added to the report. ,

I expected Planning's evaluation of the implementation of the 2017 Bethesda Downtown Plan to include a rigorous assessment of the development that has been approved and delivered since the Plan was approved, approved but not yet delivered, and projects in the development approval pipeline. This vital information was not included in the report. A description of the changes in the types and sizes of projects being approved and built in Bethesda also is lacking.

I also expected the draft report to include a description of the five metrics now used to evaluate transportation adequacy for all master plans sufficient to make these metrics comprehensible to the public. It was not included.

I also expected a clear and detailed explanation of the models used to evaluate the five metrics, the inputs to the models, and the assumptions made for the modeling. But the description of the models is woefully inadequate. Particularly concerning is the lack of information about the residential to commercial assumptions made for the modeling and the projections of population increase. Further, it appears that only three models were run, each with a different density limit, but no variation in other variables.

It is standard when modeling to conduct sensitivity analyses around key input assumptions, but this does not appear to have been done. Given that this modeling exercise is the one and only test used to justify lifting the cap, the analysis should have been more transparent and more thorough.

One of the model variables, the residential to commercial proportion, could have a profound impact on the model outputs. Only a very general statement about the

proportions used is provided in the report, but it appears from the outputs that they may have used inputs derived from the time period when several large commercial buildings were constructed (the Wilson, the Avocet, and the Marriott. But we know that the commercial-residential proportion from that time period does not reflect current or probable future trends – more recently we have been seeing primarily residential development. Different residential to commercial proportions should have been tested, with at least one scenario being that the vast majority of future development would be residential.

A partial list of inaccuracies and errors in the public hearing draft is provided at the end of this letter

Lifting the Development Cap and Subsequent Check-Ins I can support lifting the development cap in Bethesda provided additional analyses conducted now to rectify the weaknesses in the analyses done thus far indicate no issues and provided several check-in points are included in the Bethesda Overlay Zone. These check-ins should evaluate whether the five transportation metrics used to assess master plans are within the acceptable limits, that the pace of development is not still outpacing delivery of the amenities and infrastructure facilities recommended by the Plan, if the projected residential to commercial development ratio and population growth are being realized, and if affordable housing goals are being achieved. If things are out of kilter, remedial actions could then be taken. If new development does outpace delivery of amenities and infrastructure and if it results in violations of the five metrics, Bethesda may no longer be a place where people want to live, work and play as described in the Plan.

#### Park Impact Payment (PIP)

The PIP provides crucial funds for developing and delivering new parks in Bethesda, so I support increasing the PIP fee as recommended in the report. But, as was acknowledged at the time of the Plan's development and approval, the PIP can only provide a small portion of the funds needed to develop the parks described in the Plan. The Parks department needs to actively seek other funding sources for park development in Bethesda.

Thank you for your consideration of this testimony,

Dedun Ingram  
4312 Willow Ln  
Chevy Chase, MD, 20815

**Partial List of Inaccuracies and Errors in Public Hearing Draft Report**

General concerns.

The sources for the data provided in the report for “Downtown Bethesda”, Bethesda CDP, and the County should be specified as should the boundaries of “Downtown Bethesda” (if it varies from the Plan area) and a description of the boundaries of the Bethesda CDP because this will not be generally known by the public.

Bethesda CDP and Montgomery County are both places recognized by the Census Bureau. Presumably the source of the Bethesda CDP data is the Census Quick Facts (based on the American Community Survey), and the source of the County data is the Census Bureau’s county tabulations of American Community Survey data. However, this was not specified and should be. Additionally, the area covered by the Bethesda CDp should be described here – it is a substantially larger area than the Plan area (includes 8 zip code tabulation areas: 20814, 20815, 20816, 20817, 20889, 20892, 20894, and 20895). But what about the source of the data for the Plan area? This is not a Census recognized place, so how were the statistics for Downtown Bethesda obtained -- and do the Plan boundaries correspond with the boundaries for Downtown Bethesda cited here? This should be specified here.

A number of the statistics provided by the American Community Survey (via Quick Facts or other portal) are for individual years, but most (e.g., % living in owner-occupied housing and median income) are for 5-year intervals. For the statistics provided in this report, those that are for 5-year intervals should be so identified (not 2022 but 2018-2022 for example). Are the statistics now referenced as for 2012 for 2012-2016 or for 2008-2012? They need to be correctly labeled.

Additionally, a number of the statistics provided are referred to as “averages” but actually are medians. Average connotes “mean”, not “median”. Again, this inaccuracy should be corrected.

### **Some specific comments**

PG. 4, 1st Para.

“It is home to more than 17,000 residents, over 33,000 jobs including the two largest employers in the county, Marriott and the National Institutes of Health, and a diversity of housing types.”

Comment: This statement is incorrect because NIH is not in the Bethesda Downtown Plan Area. Without the NIH staff, is the number of jobs in Bethesda still 33000? Does that number reflect the departure of Clark staff and other losses? A date should be added to the sentence and the recent layoff of 833 Marriott staff included.

Pg. 4, 2<sup>nd</sup> para:

“Since the adoption of the Plan, downtown Bethesda has added almost 2,500 new residents and over 4,200 jobs.”

Comment: The source of these numbers should be provided here. Does the 4,200 jobs number reflect the addition of the 3,500 Marriott jobs? This will need to be reduced by the 833 Marriott layoffs.

Pg. 4 Last paragraph.

“In recent years, however, the pace of development has slowed significantly from the pre-pandemic peak. Rising construction and financing costs continue to make development more challenging, with fewer development applications and fewer recently approved projects beginning construction: eight of the 11 Site Plans approved between 2017 and 2019 have been built or are under construction, compared with three of the 14 approved between 2019 and 2024. This slow-down has also meant more fitful implementation of the 2017 Plan vision, with fewer PIPs and slower progress toward Plan recommended improvements”

Comment: The time references are confusing: “site plans approved between 2017 and 2019,” (does this refer to plans approved during 2017, 2018, and 2019? Or to plans approved in 2017 and 2018, or something else?) and plans “approved between 2019 and 2024” (what plans are being included here?)

This paragraph talks about a slowdown in development in Bethesda since 2019 but provides woefully little information. More information needs to be provided here so the reader can get a clear picture of changes in the pace of development in Bethesda since the adoption of the Plan. Some additional many projects were approved each year (sketch, plan, preliminary plan, site plan), the type of project (office, residential, retail), size of project (square footage, BOZ density, number of residential units), current status of the project, etc., Figure 2 does not adequately portray the needed information about development in Bethesda between 2017 and 2024.

Pg. 6 1<sup>st</sup> para.

Comment: This paragraph is somewhat misleading because it fails to mention that the county has created Red Policy Areas in the County and no longer tracks traffic congestion in these areas. Bethesda has been designated a Red Policy area and so the traffic study that resulted in the 32.4 million sf development cap is no longer being considered. This should be noted here.

Pg. 6. ;last para:

“Private development will continue to construct or pay for these improvements and more through PIPs....”.

Comment: The implication of the sentence is that no funds other than from the developers are needed to develop parks and other amenities in Bethesda. That is incorrect.

Pg. 7

One of the bulleted points states that over 1,700 housing units have been added, 70% of which are in larger multi-family apartment buildings.

Comment: A table should be provided that lists the projects providing the new housing, with a breakdown by whether the project is one of the larger ones or in the other 30 percent. Also, this statement probably needs to be more carefully worded – 1,7000 new housing units were built but not “added” because some number of old housing units were demolished in the process.

Statistics are given for “average” income, “average” house value, and “average” rent

Comment: This is inaccurately stated, the statistics Census provides for these measures are medians, not averages. Also, Census provides these for 5-year intervals, not for single years. The time interval should be included here.

Pg. 11

The very brief description of the 5 metrics used to study development increases in Bethesda states that impacts of the proposed new levels of development on individual intersections was not studied -- that this is done at the time of each individual project’s review.

Comment: But this is misleading because it is not mentioned that traffic impacts and intersection function are not studied for projects coming to Bethesda because it is a Red Policy Area

Pg. 13.

What is the Bethesda CBD policy area? Referred to in Table 1?

Pg. 13

Why was the result of the consultant’s estimated value of square footage not included in the discussion of the PIP and its cost?

No specifics are given for how many additional family size MPDU units or deeply affordable units must be provided in order to receive the PIP reduction.

Comment: I understand that this has not yet been determined, but a sentence needs to be added here noting that this detail will be added. A project should not receive this benefit unless a reasonable number of such unit are added.

Pg. 20

It is stated that NOAH is housing that rents below “market-rate”.

Comment: This is not correctly stated. It is renting at the market rate for housing of this age, type, and size.

## **The model**

It appears that a model was run under three density scenarios:

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

Comment: The word “additional” should be inserted before square feet to make it clear that an additional 11 million, 16 million, and 22 million square feet of density would be added over and above the 9 million that were originally approved for Bethesda.

Which of the 3 scenarios is supposed to represent the “no cap” scenario?

The time frame for each of the three scenarios is not made clear. This information should be added to the text and to the tables in the Attachment.

The information provided about the model is insufficient. The information about the inputs and outputs also is insufficient and the tables provided in the attachment need additional citations and titles to properly explain them, both in the text of the report and on the tables..The projected population of Bethesda under the three scenarios and the projected employment for Bethesda should be provided in a table.

What levels for the 5 metrics would have indicated too much development under a scenario?

The report states: “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” And on page 11 it is further stated

that: : “The scenarios distribute density between residential and commercial uses based on recent and projected trends.

Comment: The above statement about the residential/commercial proportions used in the models needs further explanation. What is the existing proportion? The proportions should be provided. The “growth factors” should be shown. We have seen very little commercial construction since the Plan began and even less in the more recent years. So, using “on the ground” proportions will probably result in unlikely projections. A sensitivity analysis should be done using a range of proportions (including some reflecting new development as primarily residential). Does the statement in Table 1 that the forecast growth in jobs exceeds the growth in population refer to “rate” of growth or to actual numbers?.

### **Master Plan adequacy tests and results section**

Comment: Do the 6 TAZs used in the modeling conform to the boundaries of Downtown Bethesda, or do they encompass additional territory? This should be specified here.

**From:** [V.BN](#)  
**To:** [MCP-Chair](#)  
**Subject:** WRITTEN TESTIMONY FOR December 2 – Item 1 – Bethesda Downtown Plan Minor Master Plan Amendment – Public Hearing  
**Date:** Wednesday, November 27, 2024 11:05:32 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

## **December 2 – Item 1 – Bethesda Downtown Plan Minor Master Plan Amendment – Public Hearing**

**You have already heard the arguments against your well intentioned but misguided recommendations from the Planning Department to amend the Bethesda Downtown Plan, approved by the County Council in 2017. In 2017, there were less than 24 million square feet already constructed. Today there are nearly 28 million square feet already built or under construction, and another 2-3 million approved - a total of about 30.4 million. The actual cap is 32.4 million square feet but the Plan allows for a check-in at 30.4 million.**

**According to the required climate assessment, removing the cap would lead to an increase in population within the downtown Bethesda boundaries from 16,179 to 33,499. One result: an increase in vehicular miles traveled and greater traffic and congestion to adjacent neighborhoods, shopping areas, work and other regional communities. Increased vehicle traffic will also have a negative effect on air quality.**

**A consultant notes that none of the analyses "for rental housing, condominium or office development show the financial ability to support higher construction costs, land costs, development impact fees or park impact payments." Further, Planning claims development supports infrastructure and amenities. The Plan calls for 13 new parks, a total of 13 acres. Not one has been delivered in the**



**first 7 years of the plan.**

**Why such a rush to remove the cap despite the high vacancy rates?**

**For your consideration:**

- **Traffic along the main arteries in downtown Bethesda are already at an all-time high. Examples from expanded Navy/NIH complex and new Marriott Headquarters.**
- **Why increase downtown density when there is already plenty of undeveloped land along the Wisconsin/Rockville Pike corridor that is served by the DMV Metro lines for which they were designed?**
- **The mile wide zone proposed for development is set to impact settled old neighborhoods that are already well underway in new construction of high end houses that will increase the tax revenue from real estate taxes for the County. Why mess with it?**
- **Like the ill-conceived “dedicated” bike lanes along Rockville Pike and Little Falls Parkway, this proposal is not needed any time in the foreseeable future and will ensure costly litigation.**
- **Don’t waste more tax payer money and use them for existing infrastructure repair needs and improvements.**

**Sincerely,**

**Victor Bonilla**

**Vbn44@msn.com**

**Greenwich Forest Citizens Association**

**7824 Hampden Lane**

**Bethesda, MD 20814**

**From:** [Dennis B Collins](#)  
**To:** [MCP-Chair](#)  
**Cc:** [ccfhmd@gmail.com](mailto:ccfhmd@gmail.com); [Donna Fey Collins](#)  
**Subject:** WRITTEN TESTIMONY for Planning Board Meeting at 6PM 02Dec2024  
**Date:** Wednesday, November 27, 2024 10:57:48 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

MCP–Chair —

This is regarding recommendations from the Planning Department to **amend the Bethesda Downtown Plan** that was approved by the County Council in 2017.

The primary purpose of the amendment is to **remove the density cap** to allow more development in downtown Bethesda. Removing the cap would lead to an increase in population within downtown Bethesda from 16,179 to 33,499. **Quality of Life would be downgraded** because of: **(1)** an increase in vehicular miles traveled; **(2)** greater traffic and congestion in adjacent neighborhoods, shopping and work areas, as well as in other regional communities; and **(3)** a negative effect on air quality.

The 2017 Plan calls for 13 new parks for a total of 13 acres. **Not one new park has been delivered** in the first 7 years of the Plan. Despite this fact, the Planning Department asserts that **more development** supports infrastructure and more amenities.

Why is there a rush to remove the density cap in the face of **existing high vacancy rates**? Just because developers want new projects for their bottom line is no reason to ignore the resulting **negative effects on Quality of Life for the rest of us.**

Thank you for your serious consideration of this written testimony.

Respectfully,

— Dennis B. Collins and Donna Fey Collins

6004 Overlea Road, Bethesda, MD 20816-2454

**From:** [Naomi Spinrad](#)  
**To:** [MCP-Chair](#)  
**Subject:** Bethesda MMPA written testimony for 12/2 hearing  
**Date:** Wednesday, November 27, 2024 10:44:18 AM  
**Attachments:** [Spinrad-Bethesda MMPA testimony.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris and members of the Planning Board:

Attached please find, for the record and for inclusion in the staff report, my comments regarding the public hearing draft of recommendations for a minor master plan amendment to the Bethesda Downtown Master Plan.

Thank you for your attention.

Naomi Spinrad

Artie Harris, Chair  
And Members of the Planning Board  
Montgomery County Planning Board  
2425 Reedie Drive, 14th Floor  
Wheaton, Maryland 20902

Re: December 2, 2025 hearing, Item 1, Bethesda Downtown Minor Master Plan Amendment

Dear Chair Harris and Members of the Planning Board:

Thank you for this opportunity to provide written testimony regarding the Bethesda Downtown Minor Master Plan Amendment.

Although I am a residential member of the Bethesda Implementation Advisory Committee, I'm writing to you as an individual. I live in Chevy Chase West (CCW). My community shares part of the southern border of the Bethesda Downtown plan area, Nottingham Drive. A dozen CCW homes are on the south side of Nottingham; on the north side there's Fire Station 6, owned by the Bethesda Fire Department, and an approved but not yet built seven-story condominium.

As a resident of an adjacent neighborhood, I have some major concerns about the proposed minor master plan amendment. Among them:

1. The required climate assessment, part of the attachments to the recommendations, states that, with full buildout based on current zoning, the projected population increase in downtown Bethesda from 16,179 to 33,499 "will result in greater traffic and congestion to adjacent neighborhoods, shopping areas, work, and other regional communities that will impact VMT throughout the plan area," and that the number of vehicular trips per person will increase. But the report also notes that there is no expectation that public transit trips will increase. Neither the recommendations nor the attachments describe the parameters for ensuring adequate transportation facilities, whether the existing transportation infrastructure can support this increase, what additional infrastructure may be needed, or how it will be financed. This is a traffic issue of vital importance not just to downtown and the surrounding areas but also for those using Wisconsin Avenue, Little Falls Parkway, Arlington Road and other thoroughfares in and around Bethesda for suburb-to-suburb destinations and commuter traffic in and out of DC.

It is also a safety issue as vehicles compete for road access and speed. It is not in synch with the County's Vision Zero program, and it is not addressed in the recommendations. For CCW, residents, contractors, delivery vehicles and visitors can only enter and exit the neighborhood from Wisconsin Avenue. It is challenging now; it was even more challenging before Covid and remote work.

2. The recommendations do not adequately address environmental concerns, particularly air pollution. Table 1 of the report addresses changes in GHG emissions in four areas. For transportation, there is a lifetime increase of 83.24%. For embodied building GHG emissions there is an increase of 55.95%. For building energy GHG emissions, the increase is 70.24%. Annual building waste emissions are projected to increase 81.19%. Residents, workers, and visitors in downtown Bethesda as well as surrounding communities will be at much greater risk for lung cancer and other pulmonary diseases, cardiac disease, potential neurological damage, and potential interference with organ development in fetuses. These are significant public health concerns that are not considered in the recommendations.

3. The underlying data for eliminating the cap is confusing and often contradictory to the statements in the recommendations. The study from PES, Partners for Economic Solutions, notes that there is a 14% vacancy rate for office space. Planners told the IAC at a public meeting that the office occupancy rate since 2017 is 75.6%, and residential occupancy is 84.2%. There are still over 4 million square feet under the current cap that are unbuilt. The land use community as represented at the IAC has said it will take one to three years for downtown Bethesda to see more development, with no new office development until vacancy rates fall below 8-10%. The consultant's conclusion: "None of the following pro formas for rental housing, condominium or office development show the financial ability to support higher construction costs, land costs, development impact fees or park impact payments." In fact, these all show losses. If the market cannot support development, it suggests that more care and thought should go into whether and how to change the cap than the recommendations contain, including consideration of the economic effects of the incoming administration.

4. There are significant mistakes and lack of clarity in the MMPA recommendations. Among them:

- The introduction claims downtown Bethesda "is home to ... over 30,000 jobs including the two largest employers in the county, Marriott and the National Institutes of Health...." NIH is outside the Plan boundaries; it has over 18,000 workers. Marriott has just announced 800 layoffs.
- The statement "...eight of the 11 Site Plans approved between 2017 and 2019 have been built or are under construction, compared with three of the 14 approved between 2019 and 2024." You can't count 2019 in both groups, and there's no acknowledgement of the effect of the pandemic on interest rates and other costs.
- There is no explanation of the parameters for determining adequate transportation infrastructure for the finding noted above that the population increase will lead to more congestion in downtown Bethesda and its neighboring communities. The climate assessment may not be a traffic study but this finding should not be ignored in the recommendations.
- The PES financial analysis finds that removing the cap will result in \$39 million in added revenue each year. Of that, \$22 million will go to providing services for new residents. Of the remaining \$17 million, "almost half of the taxes paid by downtown Bethesda developments and their residents and tenants [will be] going

to the General Fund to support the cost of providing services to other parts of the county.” Very little of this comes back to Bethesda. Based on the seven years of the plan to date, it is disingenuous and misleading to claim that this revenue can make much contribution to bring parks, green space, and a recreation center to downtown Bethesda. Add to that the recommendation to divert some of the PIP to a rec center and it is unlikely we will get any of these amenities. And in a county with a \$7 billion operating budget and a nearly \$6 billion CIP, this is a miniscule amount.

- The most recent cost estimate for the Capital Crescent Trail Tunnel is \$82.5 million. Yet the recommendations say “Private development and public investment have...begun the work of realizing...the Capital Crescent Trail tunnel under Wisconsin Avenue.” This is misleading, as the tunnel is not funded and the County has so many more pressing needs.

The draft recommendations lack sufficient supporting data to justify the MMPA. Often what data there is in the attachments seems to be ignored, cherrypicked or contradicted in the recommendations. The Board should obtain and carefully analyze the projections and assumptions used to determine the need for change to the cap and the best way to move forward. If you decide at this time to increase or eliminate the cap, there must be check-ins at regular intervals with identified benchmarks to ensure that infrastructure and amenities catch up - and keep up - with development. I hope you will also consider the public health and traffic safety implications of the proposal.

Thank you for the opportunity to comment and for your consideration.

Sincerely,  
Naomi Spinrad  
4810 DeRussey Parkway  
Chevy Chase MD 20815

**From:** [Howard Schoenholtz](#)  
**To:** [MCP-Chair](#)  
**Subject:** Do Not Lift Development Caps in Bethesda  
**Date:** Wednesday, November 27, 2024 10:28:09 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

To Chair Harris and the Members of the Planning Board:

As a 31-year resident of Bethesda, I am writing to urge you not to lift the development caps in Bethesda.

Over the years, my wife and I have watched as Bethesda changed from a vibrant place with structures built to human scale to an over-built warren of steel and glass best noted for the soul-sucking wind tunnel canyons that have been created as a result.

Lifting the development caps would be the like the Board saying, “whatever,” and abrogating its responsibility to plan our County’s growth in a manner that works for those of us who call MoCo our home.

I also ask the Board to consider the deleterious effects lifting the development caps will have on all of the communities surrounding downtown Bethesda. Unlimited development means unfettered growth in population and density in the downtown core. It also means a rapid increase in the number of vehicles attempting to navigate this region’s already overcrowded roads.

I implore you to resist the siren song of lifting the development cap for Bethesda. Turning our downtown area into another Rosslyn is a terrible idea.

Thank you for your time and consideration.

Howard Schoenholtz  
Bethesda.

**From:** [Howard Schoenholtz](#)  
**To:** [MCP-Chair](#)  
**Subject:** Re: Automatic reply: Do Not Lift Development Caps in Bethesda  
**Date:** Wednesday, November 27, 2024 10:30:56 AM

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Howard Schoenholtz  
5810 Ogden Court  
Bethesda MD 20816-1263

Howard Schoenholtz

On Wed, Nov 27, 2024 at 10:28 AM MCP-Chair <[mcp-chair@mncppc-mc.org](mailto:mcp-chair@mncppc-mc.org)> wrote:

Thank you for contacting the Planning Board Chair's Office. This confirms receipt of your message for distribution to appropriate staff to review. If you have submitted an inquiry, we will respond in a timely manner. You may also leave a voice message at (301) 495-4605 and a staff member will return your call.

If you have submitted written testimony for a Planning Board item, please be sure to include your mailing address to satisfy proper noticing requirements. If this was not already included, please reply to this email with that information. Written testimony submitted before the deadline of 12pm, two business days before the scheduled Planning Board meeting, will be distributed to the Board and staff and included in the public record. Written testimony received after the deadline will only be distributed to staff to review.

For more information about the Chair's Office, please visit:  
<https://montgomeryplanningboard.org/>



**From:** [Rogers, Elizabeth C.](#)  
**To:** [MCP-Chair](#)  
**Subject:** Testimony on Bethesda Minor Master Plan Amendment  
**Date:** Wednesday, November 27, 2024 10:18:48 AM  
**Attachments:** [Letter to Planning Board re Public Hearing on Bethesda Minor Master Plan Amendment\(6503452.1\).pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Chair Harris,

Please find attached written testimony for inclusion in the Bethesda Minor Master Plan Public Hearing record.

Thanks,  
Liz

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**Elizabeth C. Rogers**, Attorney

Lerch, Early & Brewer, Chtd. rising to every challenge for over 70 years  
7600 Wisconsin Ave | Suite 700 | Bethesda, MD 20814  
T 301-841-3845 | F 301-347-1784 | Main 301-986-1300  
[ecrogers@lercheearly.com](mailto:ecrogers@lercheearly.com) | [Bio](#)

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**Elizabeth C. Rogers**  
301-841-3845  
[ecrogers@lerchearly.com](mailto:ecrogers@lerchearly.com)

November 27, 2024

**VIA ELECTRONIC DELIVERY**

Mr. Artie Harris, Chair  
And members of the Montgomery County Planning Board  
Maryland National Capital Park and Planning Commission  
2425 Reedie Drive, 14<sup>th</sup> Floor  
Wheaton, Maryland 20902

Re: Expansion of Height Incentive Area  
Bethesda Minor Master Plan Amendment

Dear Chair Harris:

Our firm represents the owner of the properties located at 7411, 7415 and 7425 Arlington Road and 4905 Montgomery Lane in Bethesda, Maryland (collectively, the “Property”). The Property has a combined net lot area of approximately 28,443 square feet and is zoned CR 2.0, C-0.25, R-2.0, H-60’ and located in the Bethesda Overlay Zone (“BOZ”). The Property is currently underutilized and improved with several two--story commercial uses and associated surface parking. The Property is uniquely situated for residential infill redevelopment given the Property’s transit-oriented location, only 0.3 miles from the Bethesda Metro Station. However, there is no real incentive to provide additional Moderately Priced Dwelling Units (“MPDUs”) (above the 15% required), given the Property’s location outside of the Height Incentive Area. As such, we are writing to request that the Height Incentive Area be expanded to include the Property, which will promote additional affordable housing in Downtown Bethesda.

I. Affordable Housing

Affordable Housing is one of the four overarching goals of the 2017 Approved and Adopted Bethesda Sector Plan (the “Sector Plan”). (*See* page 6). Specifically, the Sector Plan seeks to increase “the provision of Moderately Priced Dwelling Units in exchange for development incentives.” (*See Id.*). However, the Height Incentive Area map, as discussed below, discourages additional affordable housing from being provided on this Property and those immediately surrounding it.

The Sector Plan was one of the first to establish a new minimum requirement of 15% MPDUs. However, unlike the other areas of the County that now also require 15% MPDUs, in

Bethesda, to qualify for MPDU bonus height a project must exceed 17.5% MPDUs.<sup>1</sup> The Sector Plan itself does not determine whether projects should be awarded additional height for providing more than 15% MPDUs. Rather, the Sector Plan defers to the BOZ to make this determination. (*See* Sector Plan page 151). The BOZ requires that projects must (1) exceed 17.5% MPDUs and (2) be located in the Height Incentive Area (established by the BOZ) to qualify for additional MPDU bonus height. The Height Incentive Area map is too restrictive along the Arlington Road corridor and unnecessarily carves out certain properties in the Arlington North district, which are naturally buffered from the surrounding residential communities by large public institutions. This carve out disincentivizes the provision of additional MPDUs on these transit-oriented properties in Downtown Bethesda, which is precisely where the County should be encouraging additional affordable housing.

This is an implementation element of the Sector Plan that should be adjusted through the Minor Master Plan Amendment, to further promote the Sector Plan’s goals. **As such, we are asking the Planning Board to expand the boundaries of the Height Incentive Area Map as shown on Exhibit A** (the properties shown in red thereon are hereinafter referred to as the “Expanded Boundaries”).

This expansion of the Height Incentive Area will not have any negative impact on the surrounding properties. The Expanded Boundaries are naturally buffered from the surrounding residential community by publically owned land, including Arlington Road, the Bethesda Library and Bethesda Elementary School. In fact, the edge of the closest single-family residential property (as measured to the back of the rear yard) is more than half the length of a football field away (*i.e.* approximately 190 feet). The additional MPDU bonus height allowed (*e.g.* 12 feet) will have very limited perceived impact on any of the surrounding properties, either located within or outside the Central Business District. This is in part because the Bethesda Design Guidelines provide adequate design controls, such as tower step-backs, that will minimize any impact from this modest additional height on neighboring properties. Additionally, there is already a diversity of building heights in this district, including, but not limited to, the 72’ tall Edgemont building and recently constructed 150’ tall Edgemont II building, both located along the north side of Edgemoor Lane. Therefore, the modest additional height proposed on the few remaining development sites in the Expanded Boundaries will not be out of character with the surrounding area.

For example, the inclusion of the Property in the Height Incentive Area will incentivize the property owner to provide additional MPDUs with any residential redevelopment, by

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<sup>1</sup> In other areas of the County where 15% MPDUs are required, either by the Sector Plan or by virtue of being located in a high-income planning area, projects are still entitled to MPDUs bonus height for exceeding 12.5% or 15% MPDUs. (*See* Zoning Ordinance Section 4.5.2.C.7, which allows CR zoned properties to obtain MPDU bonus height for exceeding 12.5% MPDUs and Section 4.9.8.C.3.b, which requires projects only to exceed 15% MPDUs in the Downtown Silver Spring Overlay Zone to obtain MPDU bonus height).

allowing for an additional floor (or 12 feet in height) to accommodate those MPDUs. This would result in an increase in building height from the 60 feet allowed by the base zone, to 72 feet. The condominium immediately to the east of the Property is already developed with a comparable, approved building height of 70 feet. As such, the 72 feet proposed certainly would not alter the character of this district or have any adverse impacts on existing or proposed nearby development. However, importantly, it will help to incentivize the production of additional affordable housing in this transit accessible, Downtown location.

## II. Park Impact Payment (“PIP”)

As the Planning Board is aware, a confluence of factors, including persistently high interest rates, high construction costs, and constrained access to capital, have slowed new development in the region. There are a number of projects in Downtown Bethesda that are unable to move forward due to these economic constraints. Increasing the PIP adds another layer of cost that only further challenges the financial feasibility of new development. It is one of the many costs that developers must pay, which directly benefits public infrastructure. Notably, the PIP has raised over 15 million dollars for new parks in Bethesda. The PIP has already been increased by almost 25% to-date. With Staff’s recommended increase to correct for prior rate adjustments, the rate will have gone up by over 50% since it was first established. There is a tipping point. Increasing the PIP, which adds another significant upfront cost to projects, could have the unintended consequence of realizing even less money for parks, due to less projects moving forward. As such, we recommend the Board not support any further increases to the PIP. We are also supportive of Staff’s proposed modification to the timing of PIP payments, which recognizes the extra financial burden these up-front costs have on new developments.

## III. Density Cap and “Use or Lose”

We support Planning Staff’s recommendation to eliminate the density cap in Bethesda. It is important that developers and property owners have certainty in the process. A density cap under which a project cannot vest its right to density until Site Plan is contrary to this. This uncertainty adds a risk that can deter investment in Bethesda, especially in tight markets like we are experiencing today. Additionally, the density cap carries with it a “use or lose” requirement. This requirement is especially burdensome in challenging economic times, where developers are forced to pay significant building permit fees, without having secured construction financing, just to avoid losing their entitlements and having to re-start the process. The elimination of the cap will help to provide needed certainty to ensure that desirable, additional development continues in Bethesda.

Thank you for your consideration of our comments.

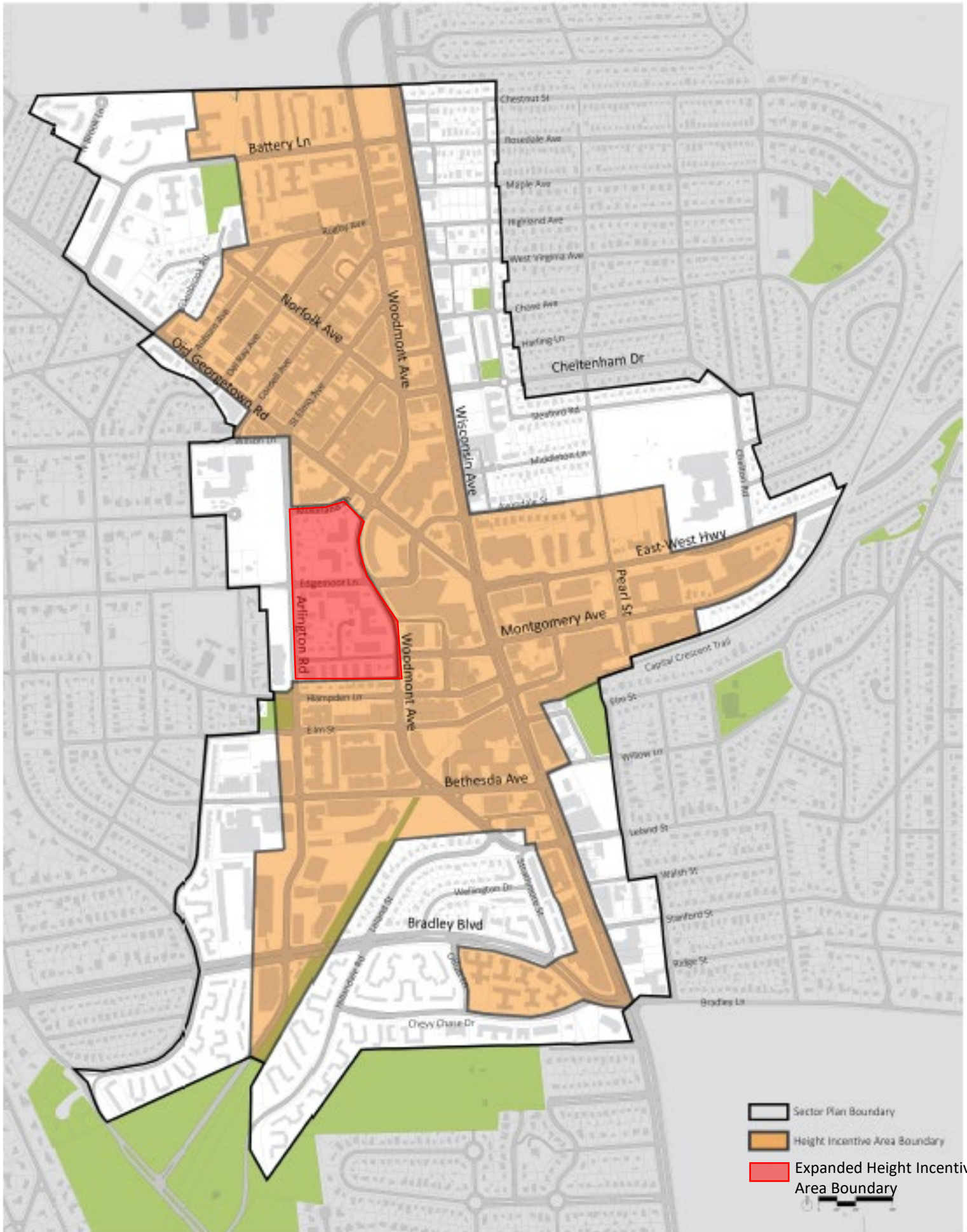
Chair Artie Harris  
and Members of the Montgomery County Planning Board  
November 27, 2024  
Page 4

Very truly yours,

  
Elizabeth C. Rogers

Cc: Robert Kronenberg  
Elza Hisel-McCoy  
Stephanie Dickel

# Exhibit A



**From:** [Meg Jones](#)  
**To:** [MCP-Chair](#)  
**Subject:** Written testimony AGAINST lifting the density cap in Bethesda  
**Date:** Wednesday, November 27, 2024 10:07:04 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

As a lifelong resident of Bethesda for my entire 58 years, I am against lifting the residential cap in downtown Bethesda. There is already too much traffic congestion, limited parking, lack of green space, and overcrowded schools. Please do not ruin Bethesda for future generations.

Margaret Beuchert Jones

Margaret Beuchert Jones  
240-353-4490  
[beuchertjones@icloud.com](mailto:beuchertjones@icloud.com)

**From:** [Joan Barron](#)  
**To:** [MCP-Chair](#)  
**Subject:** Bethesda Downtown Plan Amendments  
**Date:** Wednesday, November 27, 2024 9:14:53 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Good Morning,

A few items of concern regarding more development in Bethesda, which is what this is. I live on the “Green Mile” between Bradley Blvd and Dorset Ave.

I am concerned about traffic implications: pollution, congestion and the like. I also live near Norwood Park. A much loved park enjoyed by much of the Bethesda community as well as our community. Incentivizing new parks sounds great but where do I hear of new concrete( please no) plans for any. I am also very concerned about the condition of the Little Falls Stream Valley. More buildings means more runoff to this stream which in many places are dead. I know of no plan to find out the sources the present pollution running into the stream nor plans to minimize the effects of development on the stream’s health.

Respectfully

Joan Barron  
4704 Morgan Drive  
Chevy Chase West



**From:** [Andy Leon Harney](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Hisel-McCoy, Elza](#)  
**Subject:** Bethesda Minor Map Amendment Statement  
**Date:** Wednesday, November 27, 2024 9:10:49 AM  
**Attachments:** [Section 3 Statement on Bethesda Minor Map Amendment.pdf](#)

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On behalf of the Council of Section 3 of the Village of Chevy Chase, I am submitting the attached statement regarding the Bethesda Minor Map Amendment. If there is some other location to submit this statement, please advise.

--

Andy Leon Harney  
Village Manager  
(301) 656-9117

# SECTION 3 OF THE VILLAGE OF CHEVY CHASE

P.O. Box 15070

Chevy Chase

Maryland 20815

301/656-9117

[www.chevychase3.org](http://www.chevychase3.org)

## Statement on the Proposed Bethesda Minor Map Amendment

Montgomery County Planning Board  
2425 Reedie Dr. 14<sup>th</sup> Flr  
Wheaton, MD 20902

November 26, 2024

**Re:** Bethesda Minor Map Amendment of Master Plan

Dear Montgomery County Planning Board Members:

The Council of Section 3 of the Village of Chevy Chase has been monitoring the Planning Board's proposal to eliminate the density cap currently in place in the 2017 Bethesda Master Plan and would like to provide comments in advance of the Board's December 2 hearing. We are respectfully asking the Planning Board to consider seriously the input provided below.

The Planning Board's so-called "minor" amendment is a misnomer and has major implications for Bethesda and the surrounding localities. Bethesda is the focus for shopping, eating and working for many of our residents. The potential negative impact of unlimited density in Bethesda is a concern for our community. This proposal is also coming at a time of great potential upheaval for the entire metropolitan area. Anticipated cutbacks in government employment promised by the incoming administration would have a ripple effect on all of Montgomery County and its growth. In addition, one of downtown Bethesda's major employers, Marriott, has already announced it is laying off 800 workers.

We respectfully request that the Planning Board perform much needed impact analyses, provide the resulting data to the public to allow for meaningful community input, and make any appropriate changes before moving forward with this proposed major adjustment to the density cap.

First, the County must **make good on the promises of the 2017 Master Plan before eliminating the cap**. All too often, Montgomery County is playing catch-up with public facilities and amenities. We still do not have a running Purple Line or many of the parks or other transit proposed in the initial 2017 Master Plan. With those promises and needs still unmet, it is irresponsible to encumber the County with more commitments without careful analysis and more public discussion.

It takes years for schools to be built, for parkland to be acquired, and for public transit routes to be designed much less built, yet the proposed map amendment offers no contingent metric for frequent, periodic assessment (not just monitoring) of the status of growth so that all the necessary improvements can be made.

Related to this, we are concerned that the proposed map amendment calls for allowing the Park Impact Payments (PIP) to slide and not be paid up front with a building permit. That recommendation seems to guarantee that we will once again be playing catchup on parks as we will not have the funding.

Second, the County must **provide the public with detailed metrics on the impact of eliminating the cap, such as:**

- Maps detailing where the new density would be located;
- Population estimates of how many additional residents would be moving in, including school-aged children. The report from the Planning Board on the map amendment quotes projections by MCPS that only go through 2029-30, but the plan goes through 2045. Moreover, the school district is already shifting boundaries and there is the very real possibility that more schools will shift, complicating projections at this point in time;
- A comprehensive analysis of commercial vacancy rates across all building classifications, to ascertain which areas might be ripe for conversion to residential units at a lower price point instead of possibly more costly demolition and more new high rise construction;
- An examination of the viability of the public utilities and the county stormwater management systems to support unlimited this additional square footage; and
- Measurement of the transportation system's ability to withstand unlimited, unchecked growth. Once measured, there must be concerted coordination between the Planning Board and the State Highway Administration, as the major arteries in the Bethesda Plan (Routes 355 and 187) are state roads. Relatedly, there should be an analysis on the spillover effect onto other state roads like Connecticut Avenue as density is built up in Bethesda.

Congestion is obviously a current problem. Significant commercial, residential, and school-related loading and unloading issues are an everyday reality across all of Bethesda. More Bethesda density would mean more congestion for a system that cannot handle the current density. Eliminating the cap before making a concerted effort to analyze these impacts is a prescription for failure.

Finally, the County should take this opportunity to improve the availability of both affordable and truly "attainable" housing in the Bethesda Master Plan. As a key initiative of the Planning Board, it is striking that there has been no effort to incorporate truly "attainable" (let alone truly affordable) housing and different housing types into the existing Master Plan. The Planning Board's most recent progress report on the Bethesda Plan points out that "the average monthly rent increased 23%, with about 46% of renters spending more than 30% of their income on rent, a 30% increase."

The Council also found that "Downtown Bethesda has less racial diversity than the county as a whole, but since 2017 the proportion of non-white residents has increased from 27% to 33%. Asians are the largest group among people of color, with Black, Asian, and Latino populations growing 31%, 54%, and 18% respectively. Average income increased 27% to almost \$185,000, as compared with the county average \$173,000. Average house value increased 23%."

In short, the expanded Bethesda Plan would provide more housing (including more MDPU's), but the diverse housing types and price points that would appeal to diverse income levels and races are absent.

The lack of any emphasis on middle-income housing strikes us as cognitive dissonance.

This plan to expand density offers more of the same thing which the Planning Board has said they do not want at the same time the Board is promoting the concept of "attainable" housing—higher cost housing for higher income residents. Review of the Bethesda Master Plan seems like a missed opportunity to

create a comprehensive plan to provide housing for all. Saying Plan will make efforts to preserve naturally occurring affordable housing is not enough.

We urge the Planning Board to develop these methods of analysis along with population projections and density maps to allow the County to maintain control of a true Master Plan. It is difficult to imagine a workable master plan with unlimited density without a set of contingent metrics to rein in growth if we cannot provide full amenities and diverse housing for all income levels in a timely manner.

Thank you for your consideration of these comments.

**From:** [Todd Hoffman](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Hisel-McCoy, Elza](#)  
**Subject:** Town of Chevy Chase Testimony, December 2, 2024, Item 1, Bethesda Minor Master Plan Public Hearing  
**Date:** Wednesday, November 27, 2024 8:58:29 AM  
**Attachments:** [TOCC Testimony on MMPA \(12-2-2024\).pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Please see the attached testimony from Town of Chevy Chase Mayor Irene Lane. Thank you.

---

Todd Hoffman  
Town Manager  
Town of Chevy Chase, Maryland  
[4301 Willow Lane](#)  
[Chevy Chase, MD 20815](#)  
[301-654-7144](#) (P)  
[301-718-9631](#) (F)  
[thoffman@townofchevyCHASE.org](mailto:thoffman@townofchevyCHASE.org)



Irene Lane, *Mayor*  
Barney Rush, *Vice Mayor*  
Rich Brancato, *Treasurer*  
Stephanie Martz, *Secretary*  
Joy White, *Community Liaison*

Testimony by the Town of Chevy Chase  
Montgomery County Planning Board  
Public Hearing on Bethesda Downtown Plan Minor Master Plan Amendment  
December 2, 2024

My name is Irene Lane, and I serve as the Mayor of the Town of Chevy Chase. I appreciate the opportunity to provide comments on the *Bethesda Downtown Plan's* Minor Master Plan Amendment (MMPA). At the outset, I would like to thank the Planning Department, particularly Elza Hisel-McCoy, for facilitating several community meetings over the past several months.

The *Bethesda Downtown Plan's* overarching goal of enhancing Bethesda aligns well with the County's broader objective of improving residents' quality of life. However, the proposal to eliminate the development cap raises two key concerns. First, a significant portion of the approved development remains unbuilt, leaving its cumulative impact unknown. Second, the absence of an alternative mechanism to evaluate whether the plan's objectives are being achieved on a holistic basis introduces uncertainty about how progress will be tracked and managed, and how any systemic recommendations could be made or considered.

**To address these concerns, we recommend implementing periodic, data-driven, holistic reviews of cumulative development impacts, 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.

Residents are seeking an approach 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.

For example, the community space along Elm Street has significantly benefited local retailers. Could similar spaces be incorporated into future planning? Additionally, while new bike paths have been built and more are planned, how often are they being used? We share a goal of preserving affordable housing, but how is that being achieved in practice? The recent MMPA

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

**We believe a holistic review process for Bethesda as an activity center should be established before the Planning Board considers removing 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 the reviews show that goals are being met effectively, they could guide future expansions or enhancements in amenities and infrastructure.

**Another issue that could be addressed with holistic reviews is that the MMPA’s current assertions lack sufficient data and actionable strategies for achieving key goals.** For instance, the report suggests that employment growth will outpace population growth in Bethesda but provides no supporting data. Is this assumption based on current work-from-home trends or does the Planning Department anticipate a shift as more companies return to the office?

The report projects a 24% population growth over the plan’s 20-year horizon, with a 17% increase already observed in the activity center population between 2017 and 2022—well before most approved residential projects have been constructed. Residents need a clearer understanding of projected population growth under the current development cap versus the three analyzed growth scenarios or the complete removal of the cap. Unfortunately, the appendix does not provide details on the number of residential units, or the amount of commercial space anticipated in the various zones that make up the Downtown area. While the monitoring report includes project-specific data, residents would benefit from updated cumulative information on the total amount of commercial and residential space completed, under construction, or planned.

Simply put, without holistic reviews, conducted periodically and in conjunction with community input, eliminating the development cap risks undermining the plan’s goals and leaves no assurance that transportation metrics will be assessed nor that promised amenities will be delivered. Instead, it suggests that density alone drives balanced, responsible growth. A holistic review might, for example, explore whether a portion of the proposed increase in the Park Impact Payment (PIP) should be allocated to acquiring land for a recreation center.

**Regular reviews, 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 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 and updating it either every five years or after 10 million square feet of development has been constructed. Ideally, this approach could be applied County-wide, not just limited to Bethesda.

**A data-driven, holistic review process will build confidence that growth is being managed responsibly and in alignment with both current needs and future aspirations.**

Thank you for considering these recommendations.



# *Bethesda Downtown Plan Review Report*

## **Contents & Metrics Recommendations**

### **A. Suggested Additional Performance Metrics (Compared to Baseline)**

#### **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)**
  - 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.

## **B. 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

## **C. Recommendations for Improving/Adjusting Bethesda Downtown Plan**

**From:** [STEPHEN SEIDEL](#)  
**To:** [MCP-Chair](#)  
**Subject:** Written Comments on Bethesda Minor Master Plan Amendment: Public Hearing Draft  
**Date:** Wednesday, November 27, 2024 5:46:28 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

**Written Comments on Bethesda Minor Master Plan Amendment: Public Hearing Draft**  
Submitted by Steve Seidel for the Dec 2 Public Hearing

As a longtime resident living one block away from the area covered by the sector plan, I have followed closely the development of the 2017 Bethesda plan and the recent proposed amendment to it. I respectfully submit the following comments:

**1. The draft report lacks critical information about key assumptions essential for the public to be able to understand the transportation metrics which serve as the sole basis for justifying the removal of the cap.**

The report and its attachment fail to provide specific information about the distribution between residential and commercial development used in modeling the three future growth scenarios contained in the report. Without providing any numbers, the report states: "*The scenarios distribute density between residential and commercial uses based on recent and projected trends.*" The attachment to the draft report is also vague stating:

*"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."*

In response to my request, I want to thank the staff for sending me a table with the actual percentage breakout used in the draft report. It shows that the percentage of future development under the growth scenarios assumed to be **commercial development** varies by TAZ, from a low of 20% (TAZ3725) to a high of 77% (TAZ662).

Given the reality we know, that all planned development projects for Bethesda are for residential units, this analysis appears to substantially underestimates residential growth and overestimates commercial growth. As a result, the draft report is fundamentally flawed, thereby calling into question the key conclusion that the growth scenarios tested meet the transportation metrics. At a minimum the analysis needs to be redone to look at more realistic growth scenarios with nearly 100% residential development. This alternative analysis would result, for example, in very different conclusions concerning impacts on school capacity.

**2. The draft public hearing report falls to include critical information about projected population growth in Bethesda under the three tested scenarios.**

The 2017 Plan projected that population would grow in Bethesda by a total of 24 percent over the 25 year lifetime of the plan. The draft MMPA report states that population has already

grown 17 percent from 2017 until 2022 – over just five years and well before the vast majority of new residential development already approved under the existing plan has been delivered.

The 2017 Plan allowed for development to grow from 23.1 to 32.4 million sq. ft., an increase of 9.3 million sq ft. As stated in the draft report, a large percentage of this allowable development has been approved, but not yet delivered. The three modeled scenarios in the draft report add 11, 16 and 21 million sq ft, above and beyond the original 9 million sq ft. allowed under the 2017 Plan (much of which has yet to be built). If the population of Bethesda has increased by 17 percent in only five years with just a small percentage of the original 9 million sq ft of allowable development completed, what will Bethesda's population be in 2045 under the three growth scenarios (with 11,16 and 21 million more sq ft) in the draft report? It would be useful to know, but nowhere is that information contained in the report. Why?

By failing to include future population and employment estimates for the three scenarios, the draft report lacks critical information the public and policymakers can understand — information that would have clear implications for the adequacy of parks, schools, affordable housing, libraries, traffic congestion, rec centers, etc. as Bethesda continues to expand. Instead the draft relies exclusively on the output for five transportation metrics from the MWCOG model without any discussion of key assumptions embedded in the model (e.g., do we really know how much the bike lanes will ultimately be used or the percentage of employees or residents that will work from home) and without performing any sensitivity analysis on a range of key model assumptions.

I urge you to reexamine the decision framework upon which this draft report is based. The Planning Board is essentially saying that Bethesda can more than double in size (adding 9+21 to its base of 23 sq ft) and shift from largely commercial to largely residential over the coming years and the only tests used to justify lifting the cap are 5 transportation metrics based on a whole range of tenuous (and unspecified) assumptions. But Bethesda residents, fear not, because the adequacy of the full range of public services will be assessed on a project-by-project basis! This fundamental change in approach abandons the basic premise of the master planning process (e.g., to ensure the adequacy of plan-wide public services). A more sensible approach would be to continue to use the Growth and Infrastructure Policy and School Impact fees to assess individual projects, but also to continue using Master Plans to assess the full array of critical public services.

**In conclusion, the draft report, as submitted, is incomplete and lacks critical information for the public and policymakers to assess its key conclusions. It should be revised and recirculated for public comment with a more robust analysis of critical factors, a more transparent documentation of critical assumptions, and a full assessment of the impacts of lifting the cap on the adequacy of public services.**

Sincerely,

Steve Seidel  
4426 Stanford Street

**From:** [STEPHEN SEIDEL](#)  
**To:** [MCP-Chair](#)  
**Subject:** Re: Automatic reply: Written Comments on Bethesda Minor Master Plan Amendment: Public Hearing Draft  
**Date:** Wednesday, November 27, 2024 6:29:56 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Regarding the address requirement for written testimony, I only included my street address. If you need my full address, it is:

Steve Seidel  
4426 Stanford Street  
Chevy Chase, MD 20815

Thanks.

On Nov 27, 2024, at 5:46 AM, MCP-Chair <[mcp-chair@mncppc-mc.org](mailto:mcp-chair@mncppc-mc.org)> wrote:

Thank you for contacting the Planning Board Chair's Office. This confirms receipt of your message for distribution to appropriate staff to review. If you have submitted an inquiry, we will respond in a timely manner. You may also leave a voice message at (301) 495-4605 and a staff member will return your call.

If you have submitted written testimony for a Planning Board item, please be sure to include your mailing address to satisfy proper noticing requirements. If this was not already included, please reply to this email with that information. Written testimony submitted before the deadline of 12pm, two business days before the scheduled Planning Board meeting, will be distributed to the Board and staff and included in the public record. Written testimony received after the deadline will only be distributed to staff to review.

For more information about the Chair's Office, please visit:

<https://montgomeryplanningboard.org/>

**From:** [Leanne Tobias](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Lloyd Guerci](#); [Jenny Sue Dailey Dunner](#); [Phyllis Edelman](#); [David Forman](#); [Naomi Spinrad](#); [SCA Springfield Civic Assn](#); [GMail Account Leanne](#)  
**Subject:** Bethesda Downtown Plan Modifications  
**Date:** Tuesday, November 26, 2024 3:32:43 PM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris and Members of the Planning Board:

I write in my personal capacity as a 30-year resident of the Springfield neighborhood of Bethesda, which borders directly on the Westbard development. Following are my comments on the modification of the Downtown Bethesda Plan:

1. With respect to process, public action has been scheduled for the Monday following Thanksgiving 2024, necessitating that residents' feedback be provided immediately before Thanksgiving. This depresses public engagement.
2. Members of the Springfield Bethesda community are already dealing with substantial traffic congestion, which is increasing as local employers implement back-to-office mandates. The closing of lanes on Little Falls Parkway, the primary connector road between southwest Bethesda and downtown Bethesda has exacerbated this situation, as will ongoing residential and commercial construction at Westbard. Removing the development cap in downtown Bethesda will only add to the area's traffic burden. While downtown Bethesda is a transit hub, substantial congestion is created by suburb to suburb commuting, and many people will commute by car. It is foolhardy to assume that lifting the downtown Bethesda development cap will ease congestion. Any raising of the development cap will add to growing gridlock.
3. Heightened requirements for affordable housing set-asides should be imposed for any additional residential construction in downtown Bethesda. This is needed to address the shortage of housing for moderate-income/lower-income families.
4. To date, development in downtown Bethesda has produced little in the way of public amenities, especially parks. Additional development should be contingent on the delivery of parks and other public amenities, either before or coterminus with the added construction. The 2017 sector plan contemplated the provision of multiple parks.
5. Streetscaping is virtually non-existent in downtown Bethesda. The area is already overbuilt and bland. More stringent requirements, developer dedications and/or public funding should be provided to create a more vibrant urban landscape, as contemplated in the 2017 sector plan.

Sincerely,

Leanne Tobias

5809 Ridgefield Road  
Bethesda, MD 20816  
202-355-5270  
leanne.tobias@malachitellc.com

Sent from my iPhone



**From:** [Geoff Sharpe, ASLA](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Hisel-McCoy, Elza](#)  
**Subject:** Testimony on Bethesda MMPA  
**Date:** Tuesday, November 26, 2024 2:54:01 PM  
**Attachments:** [Federal11\\_282aa0ce-aa75-4aca-89ef-eedcb1624207.png](#)  
[SKM\\_C550i24112615270.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris –

Please find our testimony attached on the proposed amendment to the Bethesda Master Plan.

Respectfully,



**Geoff Sharpe, ASLA**

VICE PRESIDENT - CREATIVE PLANNING & DEVELOPMENT

Federal Realty

d 301-998-8192 | c 301-272-7856

909 Rose Ave Suite 200

N Bethesda MD 20852

[gsharpe@federalrealty.com](mailto:gsharpe@federalrealty.com)



Artie Harris, Chair and Members of the Planning Board  
Montgomery County Planning Board  
2425 Reddie Drive, 14<sup>th</sup> Floor  
Wheaton, MD 20902

VIA EMAIL

**RE: 12/022/2024 Planning Board Hearing: Bethesda Minor Master Plan Amendment**

Dear Chair Harris and Members of the Planning Board:

As a major stakeholder in downtown Bethesda, Federal Realty has a significant interest in the continued economic viability of the area and provides the following two comments in connection with the Bethesda Minor Master Plan Amendment.

First, we are concerned about the proposed rate of the Park Improvement Payment (“PIP”). When the Downtown Plan was adopted in 2017, the PIP was \$10 a square foot and is now \$12.49 as a result of the required bi-annual adjustments. We understand that there is now discussion about increasing the PIP to more than \$15, which would represent a 50% increase in just seven years. This substantial increase does not fairly reflect the increased cost of park construction (park construction costs have not increased at the same rate as building construction costs) or the change in land values (if anything, land values have remained stagnant or have decreased since 2017). The Planning Board, as well as the County Council must recognize that County-imposed construction costs – such as the PIP, Impact Tax rates, and off-site infrastructure costs – increase the cost of construction significantly and ultimately determine whether a project is able to move forward.

Unlike in other areas of the County the mapped zoning densities in Bethesda are suppressed. To obtain the desired amount of density, a property owner must pay the PIP, making a meaningful financial contribution to the County. In essence, the desired density in Bethesda has been monetized and results in additional funds to Montgomery County. The Planning Board and the County Council must practice restraint in considering additional increases to the PIP rate and be mindful that too great of increase may inhibit future development in Bethesda.

Second, we support the Amendment’s recommendation to eliminate the development cap. The Minor Master Plan Amendment recognizes that development patterns since the adoption of the 2017 Bethesda Downtown Plan do not warrant the need for a cap. As we have previously expressed, the density cap casts a pall on economic development in Bethesda. It is virtually impossible to provide an investor with complete assurance that the cap will not be reached and this cloud (or perhaps more correctly, this threat of a cloud) is enough to discourage some investors who will simply divert funds to a more hospitable market.

We appreciate the opportunity to share our thoughts on the Public Hearing Draft of the Bethesda Minor Master Plan Amendment.



Respectfully,

A handwritten signature in dark ink, consisting of a stylized initial 'G' followed by a long horizontal flourish that ends in a period.

Geoff Sharpe

cc: Elza Hisel-McCoy

**From:** [bryan cannon](#)  
**To:** [MCP-Chair](#)  
**Subject:** Opposition to eliminating development cap in downtown Bethesda.  
**Date:** Tuesday, November 26, 2024 10:43:26 AM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Please note my comments for the record.

I'm opposed to eliminating development cap in downtown Bethesda. I believe the surrounding road systems are already over-stressed, and should not absorb more. I imagine the same is true for other civil infrastructure.

I live immediately south of downtown Bethesda. My community suffers the consequences of extraordinary, ever-increasing traffic volume on Wisconsin Avenue (MD 355). None of the scores of neighborhood streets connected to 355 were designed or intended to feed into a superhighway-like river of car traffic. The situation is difficult and dangerous; higher density in Bethesda will certainly exacerbate the problem.

I also believe the tower construction and building density increases of the last 10 years have diminished our quality of life overall, with most (if any) benefits accruing to propertied interests rather than ordinary residents. I see no advantages to more of this.

Finally, I believe that whatever happens in Bethesda must be, analyzed, planned and coordinated with the larger vision embodied in the terrifying "growth corridors" described in AHSI. I am truly alarmed by the casual, unplanned, laissez-faire attitude behind the County's future visions.

Bryan Cannon  
4602 Chevy Chase Blvd  
Chevy Chase

**From:** [Rob Eisinger](#)  
**To:** [MCP-Chair; Hisel-McCoy, Elza](#)  
**Cc:** [paharris@lercheary.com](mailto:paharris@lercheary.com)  
**Subject:** Bethesda MMPA Letter from Promark to Planning Board  
**Date:** Monday, November 25, 2024 1:28:49 PM  
**Attachments:** [BMMPA Letter from Promark to Planning Board 11.25.2024.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris and Mr. Hisel-McCoy,

Please find our letter attached regarding the Bethesda Downtown Plan Minor Master Plan Amendment. We look forward to discussing the subject further with you in the future.

Regards,  
Rob



**Rob Eisinger | Principal**  
**Director of Project & Asset Management**

451 Hungerford Drive, Suite 700, Rockville, MD 20850

Tel: 301.208.6702

[REisinger@promarkpartners.com](mailto:REisinger@promarkpartners.com) | [www.promarkpartners.com](http://www.promarkpartners.com)



November 25<sup>th</sup>, 2024

BY EMAIL

Artie Harris, Chair and Members of the Planning Board  
Montgomery County Planning Board  
2425 Reedie Drive, 14<sup>th</sup> Floor  
Wheaton, MD 20902

Re: Bethesda Downtown Plan – Minor Master Plan Amendment  
December 2, 2024 Planning Board Hearing

Dear Chair Harris and Members of the Planning Board:

Promark Partners, the owners of just over three acres of land at 4338, 4340, 4400, 4424 and 4540 Montgomery Avenue and 7300 Pearl Street, located east of Wisconsin Avenue and north of the Purple Line (the “Montgomery Pearl Property”), appreciates the opportunity to share with the Planning Board our comments regarding the Public Hearing Draft of the Bethesda Minor Master Plan Amendment (“MMPA”). Following the adoption of the Bethesda Downtown Plan in 2017, we have been exploring the development of a mixed-use project for the Montgomery Pearl Property, and thus are all too aware of the development obstacles that make it difficult to get a project off the ground. The following comments are intended to ensure an economically viable project that will proceed to development.

1. Eliminate the Development Cap

**We support the MMPA’s recommendation to eliminate the development cap.**

The imposition of a density cap threatens the ability to secure needed financing and investors and thus creates a genuine barrier to development. We know this first hand, because we experienced it in our efforts to attract a joint venture partner for the Montgomery Pearl Project. Unfortunately because of the cap, we were not able to provide the necessary assurances that the cap would not be reached prior to the completion of the entitlement process. Irrespective of the actual threat of a moratorium imposed as a result of the development cap, investors are risk-adverse and if they have a limited amount of capital to invest, they will simply divert it to a site and a jurisdiction where there is no development cap and such a threat does not exist. As demonstrated in the MMPA, even under the most conservative (i.e. greatest density) scenario, there will be adequate public facilities within the Downtown Plan Area to accommodate development without the imposition of a development cap.

## 2. Limit the Increase in the Park Improvement Payment (“PIP”)

**We recommend no increases to the PIP; if an increase is determined necessary it should be significantly less than the \$15.57 currently proposed.**

We are very concerned that if there is a significant increase in the PIP, it will be difficult for projects such as Montgomery Pearl to move forward. While there was a fair amount of development in Bethesda following the adoption of the Sector Plan, most of these projects are located in the most desirous areas of Bethesda, where higher rents or sales prices can be supported. These sites “penciled out.” Many of the remaining sites, such as Montgomery Pearl, are just far enough removed from the core of Bethesda and have other construction constraints that result in increased costs and makes financing more difficult. To impose a significantly higher PIP on these projects which are already starting from an economic disadvantage, will impede development. We urge the Planning Board to exercise restraint in considering increasing the PIP. Additional reasons to limit the increase in the PIP include the following:

- The current index to which the PIP is tied, the Engineering-News Records Baltimore Construction Index, artificially inflates the cost of both parkland acquisition and park construction. The Index focuses on building costs, which requires both specialized labor and certain specialized materials. The costs of both of these has risen dramatically in the past seven years. The cost of purchasing land and constructing a park, which requires limited materials and less specialized labor, should not be tied to the indexed costs of constructing a building.
- An increase in the PIP to \$15, would represent a 50% increase since its inception. This significant increase does not correlate with the changes in the cost of land for which the PIP funds are intended. By all accounts, land values have remained steady or even decreased over that time.
- The mapped densities in Bethesda were suppressed in order to encourage developers to rely on Bethesda Overlay Zone (“BOZ”) density, which in turn required a PIP payment. In other Master Plan areas (with the exception of Silver Spring), the zoning reflects the desired development. In Bethesda, the County is effectively requiring developers to pay for a portion of the desired density, wherein in other areas the desired density is reflected in the zoning. Thus, any PIP payment received by the County is a dividend – additional funds that otherwise would not be available. For this reason, we believe any increase to the PIP should be limited.

## 3. Payment of PIP

**We recommend that the timing of the PIP payment be revised to reflect pending Bill 22-24 that would shift the payment of impact taxes to the time of final inspection of the building.**

We are encouraged that the MMPA recommends that the PIP be paid in two equal payments (at building permit and at occupancy permit) instead of prior to issuance of the building permit (or within one year of issuance) as currently required, but we do not feel that this recommendation goes far enough. Payment of even a portion of the PIP prior to the issuance of the building permit ties the cost to the construction financing. Delaying the PIP payment until the end of the process

lowers the upfront construction costs, which makes obtaining the needed financing more viable. Allowing the payment to be made at the end of the development process when an income stream is imminent, alleviates some of the burden of the payment.

4. Use it or Lose it Provision

**We support the MMPA's recommendation to eliminate the Use it or Lose it provision.**

The imposition of the requirement that the building permit must be filed within two years of Site Plan approval and issued within two years of filing imposed just one more additional uncertainty in the already uncertain field of development. As noted by the MMPA, the adequate public facility validity period provisions already imposes a standard five year period within which the building construction process must commence. Moreover, assuming the elimination of the development cap, there is no reason to further restrict the time period between Site Plan approval and building construction.

We appreciate the Planning Board's consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Eisinger".

Rob Eisinger  
Principal, Promark Partners



**From:** [Dedun Ingram](#)  
**To:** [MCP-Chair](#)  
**Cc:** [Jack Alexander \(jalexander@amrcommercial.com\)](#); [Amanda Maiorana-Farber](#); [Naomi Spinradd](#); [Joyce Gwadz](#); [Stacey Band](#); [Michael Fetchko](#); [Andy O'Hare](#); [Saul, Andrew](#); [Dave Yampolsky](#); [Jad Donohoe](#); [Matt Gordon](#); [O'Neil, Patrick L. \(ploneil@lercheearly.com\)](#); [Christopher Smith](#); [Councilmember Friedson](#); [Gibson, Cindy](#); [Sartori, Jason](#); [Hisel-McCoy, Elza](#); [Klevan, Larissa](#)  
**Subject:** Comments on the Bethesda Downtown MPA recommendations from the IAC  
**Date:** Sunday, November 24, 2024 11:01:50 AM  
**Attachments:** [IAC Comments on MPA Recommendations 11 22 2024.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Montgomery County Planning Board Chair Harris and Members of the Planning Board,

The Bethesda Downtown Implementation Advisory Committee (IAC) submits the attached letter with our comments regarding the Bethesda Downtown Minor Master Plan Amendment recommendations presented in the public hearing draft.

Thank you for your consideration of this testimony.

Dedun Ingram, IAC Co-chair  
Jack Alexander, IAC Co-chair

Mr. Artie Harris, Chair  
And Members of the Planning Board  
Montgomery County Planning Board  
2425 Reedy Drive, 14th Floor  
Wheaton, Maryland 20902  
Re December 2, 2024 Public Hearing on the Bethesda Downtown Minor Master Plan  
Amendment  
November 22, 2024

Montgomery County Planning Board Chair Harris and Members of the Planning Board:

The Bethesda Implementation Advisory Committee (IAC) consists of 7 residential/homeowner representatives and 7 commercial property owner/business community representatives, all of whom have considerable knowledge of the history and implementation of the 2017 Bethesda Downtown Plan. Please see the description of the IAC at the end of this letter. We offer the following comments on the Downtown Bethesda Minor Master Plan Amendment (MMPA) recommendations:

### Development Cap

The primary motivator behind the MMPA review was what to do with Bethesda's development cap given that on the ground and approved development had come within 2 million square feet of the 32.4 million square foot cap. Should the development cap be raised (and if so, by how much) or should it be removed?

The IAC recognizes the importance of providing certainty to property owners, developers and related financial entities that wish to redevelop and invest in Bethesda. But the IAC also recognizes that it is important to balance the need for certain and known development standards with the need to ensure that Bethesda's infrastructure and amenities will be in place to support additional growth in Bethesda. The IAC is a strong proponent for infrastructure and amenities (including parks) to keep pace with new development so that Bethesda's appeal to developers, businesses, and current and future residents will continue into the future.

We therefore support removal of the development cap only if a requirement for multiple check-in points is included in the Bethesda Overlay Zone (BOZ) to ensure community resources (parks, transportation, recreation center, etc.) are keeping pace with development, and that the policies and funding mechanisms needed to implement infrastructure improvements and public amenities have been established. We suggest the first check-in occur when we are within 10% of the original cap of 32.4 million square feet based on building permits pulled, and subsequent check-ins occur when 36.4 and 40.4 million square feet of density have been approved (4 and 8 million square feet respectively above the current cap). These check-ins should not require any action by the Planning Board or County Council but will ensure that additional analyses occur as build-out occurs since the hard cap is proposed to be eliminated from the BOZ.

The check-ins should comprehensively evaluate whether development is proceeding as predicted and that delivery of amenities and facilities is keeping pace. IAC is particularly concerned about the effects of the projected more-than-doubled population increases and skeptical about the projected employment increases.

### Parks and the Park Impact Payment

New parks are the primary “overarching” goal of the Plan. The Plan calls for 13 new parks and 13 new acres of parkland. No new parkland identified in the Plan has been delivered yet.

The IAC had suggested that, as part of the MMPA work this past year, Montgomery County Parks and Planning work with the IAC to review park priorities. This did not occur. The IAC continues to believe that this review could be useful. The IAC also urges Montgomery County Parks to be open to the acquisition of properties for parks not specified in the Plan and for acceptance of parks created through privately owned public open space, as opposed to dedication to the Parks Department.

Recognizing the high cost of developing the new Bethesda parks and the limited capacity of the CIP, the Plan established the Park Impact Payment (PIP) to partially fund the new parks – the PIP was never intended to cover all of the costs of developing the new parks. The Plan recommended identification of new financing mechanisms to provide other funds for the parks. To date no other funding mechanisms have been identified and it appears that the County is relying solely on the PIP to provide the needed funding. As well, the recommendations suggest using PIP funds for a recreation center, a new burden for limited funds. M-NCPPC should explore more creative public/private partnership opportunities for delivering on the Master Plan recommendations for public open space.

Nevertheless, the IAC supports the proposed increase in the PIP rate to \$15.57 per square foot conditional on provision of a predictable and feasible metric for increasing PIP over time and conditional on the County seeking to identify additional local, state, and federal funding sources for park development as called for in the Plan. The MMPA draft report noted that Bethesda generates considerable income for the County and the IAC does not believe it is appropriate for a disproportionately large portion of the funds generated in Bethesda to be used in other parts of the County.

Thank you for your consideration of this testimony,

Dedun Ingram, IAC Co-Chair  
Jack Alexander, IAC Co-Chair

\*The role of the IAC is described as the following in the Bethesda Downtown Plan Implementation Guidelines:

“This advisory group will work in coordination with the Montgomery County Planning Department, Bethesda Urban Partnership, Bethesda Chevy-Chase Regional Services

Center and Bethesda Green by providing specific community and redevelopment expertise that would also serve as an interface between developers and County agencies in implementing the Bethesda Downtown Sector Plan recommendations. The IAC will be guided by the vision, goals and recommendations in the Approved and Adopted Bethesda Downtown Sector Plan, the Bethesda Downtown Design Guidelines, and the Bethesda Overlay Zone. The role of the Committee is to coordinate and monitor the progress of development and address implementation of the recommendations in the Approved and Adopted Bethesda Downtown Sector Plan. The committee will help to ensure transparency and accountability in the implementation of the Bethesda Downtown Sector Plan, Design Guidelines and Bethesda Overlay Zone. It will help the Planning Board, the County Council, the County Executive and their staff to maintain the objectives of the Bethesda Downtown Sector Plan, Design Guidelines and Bethesda Overlay Zone. The Committee will strengthen the monitoring of implementation, development, and construction of the various projects comprising the Sector Plan. The committee is to provide advice and guidance to the Planning Board, County Council and County Executive staff on the County's outreach, interaction with affected communities and businesses, advice on the issues appropriate to and pertaining to the achievement of the objectives of the Sector Plan.”

Cc: Councilmember Andrew Friedson  
Cindy Gibson  
Jason Sartori  
Elza Hisel-McCoy  
Larissa Klevan

**From:** [Lloyd Guerci](#)  
**To:** [MCP-Chair](#); [Harris, Artie](#)  
**Subject:** Planning Board meeting December 2, Item 1, Bethesda Minor Master Plan  
**Date:** Saturday, November 23, 2024 1:46:43 PM  
**Attachments:** [Bethesda Downtown Plan testimony of Lloyd Guerci.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Chair Harris:

Enclosed please find my testimony/written comments. Thank you for considering this testimony.

Lloyd Guerci

Bethesda Downtown Plan  
Proposed Minor Master Plan Amendment  
Before the Planning Board  
December 2, 2024, Item 1

Written Testimony of Lloyd Guerci

I have lived in the DMV for over 51 years, and in Montgomery County, between Bethesda and Friendship Heights, for over 29 years. I oppose the Proposed Minor Master Plan Amendment Bethesda Downtown Plan ([Bethesda Downtown Plan Minor Master Plan Amendment Public Hearing Draft](#) Public Hearing Draft, October 2024).

Before I turn to my comments on the plan, I am registering my objection to the hearing date – the Monday after Thanksgiving. Many people, facing the prospect of highly unpleasant travel on the Saturday and Sunday after Thanksgiving, travel during the weekdays that follow. There was no absolute need for this hearing date.

Priorities and Concerns

I agree with these Top-Priority Improvements to the area from residents (Proposed Minor Master Plan amendment page 9), subject to a caveat discussed below. The Top-Priority Improvements are:

- New parks
- New recreation center
- Improvements to existing pedestrian network
- Preserving naturally occurring affordable housing
- Expanding tree canopy

I agree with these Resident Community Comments (Proposed Minor Master Plan amendment page 9):

- Bethesda is a growing urban center, but some are concerned development has been coming too fast.
- The development cap should be tied to achieving public infrastructure and amenities.
- Bethesda needs more affordable housing at all income levels.
- Construction-related interruptions to the pedestrian network need to be better managed.
- Loading and delivery management remains an issue.
- Driving in Bethesda can be a challenge.

## Development Cap and Parks

I oppose increasing the development cap. A caveat relating to priorities (noted above) is that the parks identified in the 2017 Bethesda Downtown Plan must be built before development projects proceed. Specifically, any development must be conditioned on specifically-defined progress on creation of parks. If sufficient, defined progress on parks is not made, then further development projects must not be allowed. This would be incremental: some more parks built - some more development allowed. I object to updating the BOZ to remove a specific development level in favor of project-specific mitigation of impacts and improvements.

Let's face it. If development is not conditioned on specifically-defined progress on creation of parks, in the end the parks called for in the 2017 Bethesda Downtown Plan will not be built, yet Bethesda will be largely built out, precluding achieving the goal on the amount/nature of parks. That will be a permanent disservice and disaster for the residents of Bethesda and the County.

Even if the development cap is raised somewhat to allow more development, it must not be removed altogether. Any increase in the cap must be in specific square feet, be specifically justified in light of defined goals and specifically consider the consequences, intended and unintended, of more development.

Not surprisingly, there is a consultant report (PES) that said in the current real estate market it is difficult for development projects to move forward. But, in fact, there is a lot of construction, which I see every week, week in, week-out. Before I retired, the majority of my work was litigation for the federal government. There were experts' reports for almost every opinion-based position in issue, with differing conclusions on both sides of the issue. As a general matter, it would be a big mistake to act on any one consultant's report and any sob stories therein as a matter of course.

## Housing

The draft Bethesda Minor Plan Amendment does not deal adequately with housing. It needs to tabulate the residential units built since the 2017 Bethesda plan was adopted, by number of bedrooms and rental price (instead, sales price for units sold). In addition, it needs to set forth a vision for future development. What problem (by price range) are you trying to solve and what specifically are you trying to achieve and how are you going to get there?

## Traffic and Roads

The draft Bethesda Minor Plan Amendment says driving can be a challenge. That is an understatement. When I drive to Bethesda, such as to get groceries, at other than the mid-morning to mid-afternoon time period, there often is a large back up on northbound Rte. 355 to go left onto Bradley Boulevard. With frustrated drivers at the wheel, some vehicles run red lights, which is a safety problem. In the aggregate, there are massive emissions of carbon-based air pollution from vehicles in the queue. This adds to global warming.

The Bethesda plan does not deal adequately with trucks that are parked and standing. This adversely impacts traffic and gives rise to drivers in traffic abruptly changing lanes to extricate

themselves from the (right) lane closed by the presence of a truck. And it is only getting worse. A particular problem is trucks carrying motor vehicles, which not uncommonly are on the west side of Arlington Road, south of Bethesda Avenue. My understanding from talking to a police officer is that the reason the auto carrier trucks get away with parking on Arlington Road near the auto dealership is that the County's signs say no parking and the trucks (purportedly) are standing. But often the drivers are not in them which makes standing an unacceptable loophole. The signs on Arlington Road need to be changed to No parking, No standing, No stopping.

Respectfully submitted,

*Lloyd Guerci*  
4627 Hunt Ave.  
Chevy Chase, MD 20815



**From:** [Elaine Akst](#)  
**To:** [MCP-Chair](#)  
**Subject:** Bethesda Downtown Plan Amendment  
**Date:** Tuesday, November 19, 2024 12:35:26 PM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Planning Board,

I am writing to oppose the proposed changes to the Bethesda downtown plan. Especially as our county enters a time of uncertainty for federal workers, with threats of increased taxes, we need to slow the growth and gifts to developers and focus on the people living here and maintaining the current infrastructure. The data used to justify the amendment is based on pre-covid projections of growth. The use of space has changed in that time, and the county should not be making changes without re-examining data and assumptions. They should also ask the tax-paying citizens of the area what they would like, rather than kow-towing to developers again and again.

The removal of the density cap is a gift to developers, but will only decrease quality of life for the residents of the area. We are dealing with tall buildings, wind tunnels, high traffic and endless construction. The schools are overcrowded, and your own research has found that public transportation cannot handle an increase of the 30 million square foot cap currently in place. We need a new traffic study to assess the feasibility of doubling the population of downtown Bethesda. It would not hurt for the members of the planning board to all spend a month living in Bethesda - driving children to school at 7:30 (there are no buses in some neighborhoods), getting to the grocery store, taking kids to activities that are not on a metro or bus line, and trying to get to work on time. Not everyone works remotely. Once you've lived with endless construction for a month, let alone 10 years, you might feel differently about lifting all construction caps.

In addition, the lack of any requirements for bird safe buildings has resulted in glass sky scrapers with high death rates during migratory times. If Montgomery County wants to be a sustainable community for the future, we need to build with the future in mind, and that requires mandatory bird-safe glass and best-practices. San Francisco and New York City both have requirements for new construction to be bird safe. We need to follow their lead rather than living in the past.

The PIP has resulted in zero new parks since major redevelopment of Bethesda began more than ten years ago. The developers need to pay more into this fund, and it needs to be paid upfront. Just because they have requested delays does not mean it should be granted. Green space is vital for both people and wildlife, and Bethesda needs to prioritize this space rather than continually aim for a more urban feel.

Please actually listen to residents and read their comments. We're not pests to be dismissed, but humans living in the neighborhoods that you have power to change. Let us be a part of this change and have our voices heard.

Thank you,  
Elaine Akst

Norwood Drive

**From:** [Senior Warden](#)  
**To:** [MCP-Chair](#)  
**Cc:** [suzanne.welch](#); [elza.hizel-mccoy@montgomeryplanning.org](mailto:elza.hizel-mccoy@montgomeryplanning.org); [Junior Warden](#); [Teimourian Sheila](#); [Executive Director of Operations](#)  
**Subject:** Bethesda Sector Minor Master Plan Amendment  
**Date:** Wednesday, November 13, 2024 11:28:44 PM  
**Attachments:** [St.Johns.MinorMapAmendmentltr.PlaningBoard.11.24.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Dear Mr, Harris,

On behalf of the Vestry of St. John's Episcopal Church, Norwood Parish, on the corner of Bradley and Wisconsin Ave in Bethesda, I am sending this letter regarding the Minor Master Plan Amendment for the Bethesda Sector.

We understand that the plan amendment recommends the removal of the development cap and the implementation of additional development controls. St. John's wants to go on the record supporting these proposed changes and the letter attached clarifies why we believe this is important to our parish and property.

Thank you for adding our comments to your planning review section in anticipation of your planning board hearing on the 2nd of December.

Sincerely,

Kevin Kehus

Senior Warden of the Vestry, St. John's Episcopal Church, Norwood Parish



November 12, 2024

Via email: MCP-Chair@mncppc-mc.org

Mr. Artie Harris, Planning Board Chair  
Montgomery Planning Board  
2425 Reedy Drive, 14<sup>th</sup> Floor  
Wheaton, MD 20902

RE: Bethesda Sector Minor Master Plan Amendment  
Planning Board Hearing Dec. 2, 2024

Dear Mr. Harris,

I am writing the Planning Board on behalf of St. John's Episcopal Church, located at the gateway to Downtown Bethesda. Church representatives participated in several work sessions and listening sessions offered on the Bethesda Minor Map Amendment and shared concerns at those sessions with planning staff and in a September 12<sup>th</sup> letter to the Planning Board.

St. John's, located at the corner of Wisconsin Avenue and Bradley Lane, has been an important part of the Bethesda community since 1874. Today, our church is a vibrant, *growing* religious community, with more than 1,000 members, including hundreds of families and parishioners of all ages. We have a very active and engaged community that has a proud history of supporting Bethesda and greater Montgomery County by incubating important community service organizations such as Nourishing Bethesda, Bethesda Cares, and Montgomery Hospice, which got their start in our facilities.

At the beginning of the Minor Plan Amendment process, it came to our attention and to our surprise that if the development cap was reached, St. John's could no longer add any Floor Area to our facilities despite the zoning and density changes addressed in the 2017 Bethesda Downtown Plan. We understand this to be the case for all properties in the Bethesda Sector Plan, not just ours. St. John's needs the ability to modernize and expand its facilities to meet the needs of its parish and ministries.

Our concern was that the plan amendment focused more on developer needs and building roads and parks. Bethesda needs much more than that to be vibrant community. The needs of small business, non-profits, organizations for the arts, and houses of worship also need to be addressed. These operations need to be able to continue to grow and thrive, supporting and benefitting the greater community.

St. John's also supports its neighbors. Residents expressed concerns at the listening sessions about controlled growth, increased traffic, and lack of affordable housing. With many of our parishioners living in the greater Bethesda area, we welcome the work of planning staff and the Planning Board to address these as well.

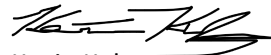
We reviewed the October 2024 draft Minor Master Plan Amendment for the Planning Board hearing. **We understand that the plan amendment recommends removal of the development cap, implementation of additional development controls and increase in the PIP payment to over \$15.57 per square foot of floor area. St. John's wants to go on the record supporting these proposed**

St. John's Church, Norwood Parish  
6701 Wisconsin Avenue  
Chevy Chase, MD 20815

**changes.** In expressing this support, St. John's assumes the technical changes to the CR zone which may come later in the implementation phase do not adversely affect the typical expansion needs as a church.

We look forward to working with the planning staff, Planning Board and County Council as this minor map amendment proceeds through to approval and implementation.

Regards,



Kevin Kehus

Senior Warden

CC:

Elza Hize-McCoy email [elza.hize-mccoy@montgomeryplanning.org](mailto:elza.hize-mccoy@montgomeryplanning.org)

Sheila Temourian, St. John's Chancellor

Janet Hall, Junior Warden

Suzanne Welch, Property Co-chair

Cindy Gibson, Councilmember Friedson's Office

**From:** [Ryan Harrison](#)  
**To:** [MCP-Chair](#)  
**Subject:** Written Testimony to Planning Board (Mon 2 Dec 2024) on Bethesda Minor Master Plan Amendment  
**Date:** Saturday, November 16, 2024 5:23:27 PM  
**Attachments:** [2024-12-02 Written Testimony to Planning Board \(Mon 2 Dec 2024\) on Bethesda Minor Master Plan Amendment.pdf](#)

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Ryan M Harrison  
4607 Rosedale Ave  
Bethesda, MD 20814

16 November 2024

Chair, Montgomery County Planning Board  
2425 Reedie Drive, 14th Floor  
Wheaton, MD 20902

Re: Written Testimony, Planning Board meeting (Monday, December 2, 2024), Bethesda Minor Master Plan Amendment

Dear Planning Board:

I am a community member that lives in East Bethesda, directly adjacent to the Bethesda Downtown Plan. My primary concern is supporting mass transit. My secondary concern is affordable housing; for example, by preserving naturally occurring affordable housing and construction permitting to encourage mixed-income development (not just low income set-asides, but also attainable non-"luxury" market-rate units).

The Minor Master Plan includes a "Transportation improvement" implementation area with metrics for "Transit Accessibility" and "Non-Auto Driver Model Share." In Spring 2024 the WMATA "Better Bus Initiative" proposed cutting J2 (renamed M70) service along Wisconsin Ave between Bethesda and Medical Center metro stations. From a community perspective, this proposal would leave the main artery of the Bethesda Downtown Plan without WMATA bus service. From a personal perspective, I rely upon this route 2-3 days per week to travel to/from the Metro stations for onward travel into DC, as well as to travel to/from Silver Spring. While the final Better Bus plan preserves J2 (renamed M70) bus service along Wisconsin Ave, I am deeply disappointed that the change was proposed at all.

Was the WMATA "Better Bus" Initiative unaware that this change would have adversely impacted a key metric of the Bethesda Master Plan? Did Montgomery Planning not communicate the essential nature of local mass transit along the Wisconsin Ave corridor? These are rhetorical questions that drive home the need for coordination between any Bethesda Minor Master Plan Amendments and the initiatives of regional partners, so that regional planning adverse to the Bethesda Downtown Plan (in this specific case, transit objectives) is headed-off before it is proposed.

I support the “Plan-recommended CIP projects”, most especially the Capital Crescent Trail (CCT) and Bus Rapid Transit (BRT) on Wisconsin Avenue. The BRT line—which should stop less frequently than local service—supplements, not supplants the need for local bus service.

In closing, I would like to express my appreciation for the planning board staff, most especially Elza Hizek-McCoy and Lisa Govani. They showed up after-hours at East Bethesda Community Association Meetings. It means a lot that these staffers would take time out of their personal time in the evenings to meet with residents. As a resident, I have neither the time nor technical sophistication to compete with developers and lobbyists at the planning board, but I can walk down the street to an EBCA meeting at Lynbrook.

Sincerely,  
Ryan M Harrison  
Resident, East Bethesda

Ryan M Harrison  
4607 Rosedale Ave  
Bethesda, MD 20814

16 November 2024

Chair, Montgomery County Planning Board  
2425 Reedie Drive, 14th Floor  
Wheaton, MD 20902

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Sincerely,  
Ryan M Harrison  
Resident, East Bethesda



**From:** [Judith McGuire](#)  
**To:** [MCP-Chair](#)  
**Subject:** Comments on Bethesda Downtown Plan Minor Master Plan Amendment 2024  
**Date:** Thursday, September 19, 2024 12:33:57 PM

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**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Yes a development cap is necessary and no it should not be raised. In fact, any new development proposals should be postponed until more of what is currently under construction is finished.

Your traffic analysis is flawed. Looking only at traffic within the downtown zone is shortsighted because when traffic on Wisconsin snarls (as it regularly does) that traffic migrates to other corridors: Connecticut Ave, River Rd, Bradley Blvd, Old Georgetown Rd, Jones Mill Rd and EW Hway. You have to look at the impact on the larger community. You also need to take into account Walter Reed and NIH traffic. It's a mess, virtually all day long. Wishful thinking about bikes, pedestrians, and Metro won't solve the traffic problem.

Highest priority should be increasing green space and trees (NOT green roofs) and completing the parks that are on the drawing boards.

By the time Bethesda's development is completed, it will be obsolete. People shop online, especially for chain store merchandise. The chains have pushed out the one-of-a-kind stores in Bethesda (Potter's Violins, Bruce Variety, one of a kind tea and coffee stores). Is anyone monitoring small business? Bethesda cannot survive on restaurants, chain stores, and yoga studios. Between the canyon effect of high buildings, no green space, and atrocious traffic, who needs to go to Bethesda?

Judith McGuire  
4003 Rosemary St.  
Chevy Chase, MD 20815