

**From:** [REDACTED]  
**To:** [MCP-Chair](#)  
**Cc:** [Fowler, Erin](#); [Leftwich, Troy](#); [Folden, Matthew](#); [Sanders, Carrie](#)  
**Subject:** Comments on MHP Amherst Preliminary Plan No. 120250010 & Site Plan No. 820250010,  
**Date:** Sunday, June 1, 2025 8:12:03 PM

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

Dear Vice Chair Pedoeem and Commissioners Bartley, Linden and Hedrick,

Thank you for the opportunity to comment on this project.

The future residents of this development deserve a world class streetscape.

I ask that you require the applicant to bury the overhead utilities along the Elkin Street frontage.

Utility undergrounding offers significant benefits such as:

- **Making room for large street trees and a healthy tree canopy.** Large, healthy trees soak up stormwater and cool off the neighborhood, making walking more pleasant and combating urban heat islands.
- **Making the grid more reliable.** A reliable grid encourages electrification of buildings and vehicles which benefits our climate.
- **Aesthetics** buried utilities provide much more beautiful streetscapes
- **Better lighting** - overhead utilities rely on Pepco's antiquated, dilapidated street lighting infrastructure mounted to their wood poles. The Maryland Public Service Commission found in 2024 that Pepco failed to provide street lighting service in a manner that was safe, efficient, just and reasonable because of slow repairs and poor recordkeeping. Undergrounding results in improved pedestrian safety because of the installation of modern, low-maintenance, energy efficient, county-owned LED lights that work much better than Pepco's overhead fed lights.

The cost estimate supplied by the applicant is exaggerated. An independent cost estimate would have come in much lower. For example, per the Department Permitting Services, EYA/HOC buried 700 feet of nearly identical utilities along Chevy Chase Lake Drive for \$1.3 million in 2017. That project also included an affordable housing component.

A Pepco representative argues that 700' of undergrounding fails to meet its minimum length requirement but that Pepco would entertain a slightly longer distance, from Amherst to Blueridge. Pepco is often absent from these discussions, so I welcome their participation. I disagree with the assessment that burying for a length of 700' might lead to "diminished performance". On the contrary, utility undergrounding has all of the above benefits. There are many recent examples of undergrounding throughout Montgomery County including the Chevy Chase Lake Drive example and there is no evidence of "diminished performance". Another nearby example of a successful undergrounding project is at 10540 Metropolitan Avenue in Kensington in front of the Solera Modena Reserve assisted living (approximately 500 feet circa 2021).

In the event that you decide not to require undergrounding, I suggest an alternative - require the applicant to place conduit along its frontage to facilitate future undergrounding. There is a precedent with the MHP project on Nebel Street.

These undergrounding conversations feel like deja vu. To better facilitate these decisions, I would encourage the Planning Board to follow the advice in the Complete Streets Design Guide and include the development of a Utility Functional Plan in your annual work plan. Such a plan would help provide more certainty to applicants and to communities and a more consistent approach countywide. And it might open up additional options such as fee-in-lieu of undergrounding.

Sincerely,

[REDACTED]

3904 Washington St  
Kensington, MD 20895

[REDACTED]