

HOLTON ARMS SCHOOL SPECIAL EXCEPTION MAJOR MODIFICATION NO. CBA- 1174-E

Description

Request to modify the existing special exception approvals (CBA-1174-E, S-2467-A, S-2503-B, S-516 and S-729) collectively under CBA-1174-E for the Holton Arms School to allow: 1) an increase in enrollment cap from 665 to 870 students, 2) an increase in summer camp enrollment cap from 665 to 970, 3) flexibility in use of facilities by third-party users, and 4) incorporate previous Board of Appeals administrative approval regarding Granger House, with no physical changes onsite.

COMPLETED: 11/3/2025

PLANNING BOARD HEARING DATE: 11/13/2025

MCPB ITEM NO. 6

Planning Staff



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LOCATION/ADDRESS

7303 River Road, Bethesda

MASTER PLAN

1990 Bethesda Chevy Chase Master Plan

ZONE

R-200 & R-90

PROPERTY SIZE

54.6 acres

APPLICANT

Holton Arms School

ACCEPTANCE DATE

December 13, 2024

REVIEW BASIS

Chapter 59 of the Zoning Ordinance in effect on October 29, 2014

HEARING EXAMINER PUBLIC HEARING

November 17, 2025

Summary:

- Staff recommends approval of the Special Exception Modification with conditions and transmittal of comments to the Hearing Examiner for a hearing scheduled for November 17, 2025.
- The proposed Amendment would increase enrollment for the Holton Arms School from 665 to 870 students, increase enrollment for the Summer Camp from 665 to 970, and allow flexibility for rental of facilities to third party groups. No physical improvements are proposed with this application.
- A Transportation Impact Study, subject to the 2020-2024 Local Area Transportation Review (LATR) was reviewed as part of the application by staff from Planning, MCDOT, and SHA.
- Staff has received public opposition to the proposed modification, which is summarized in Section 4 of this Staff Report.

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SECTION 1: EXECUTIVE SUMMARY

The Holton Arms School, located off River Road (MD-190) in Bethesda, was originally approved in 1961 as a private educational institution (Special Exception CBA-1174). Over time the special exception has been modified as operations have grown to include a daycare, summer camp, and after school activities. Notably in the early 2000s, the School underwent significant expansion and increased the enrollment cap (CBA-1174-C) to construct a new science wing and all purpose room, expand the performing arts center, create a new athletic field, improve circulation, and make associated environmental improvements and enhancements.



Figure 1 – Subject Property

With this major modification Application, the School is requesting to increase enrollment for the school and summer camp and allow flexibility for use of facilities by third-party groups, without any physical modifications on-site. The Application and analysis focus heavily on access, circulation, and mitigation of the proposed net new trips that would be generated by the increased enrollment. The Applicant submitted a Transportation Impact Study under the 2020-2024 Growth and Infrastructure Policy, as well as a Transportation Management Plan that details proposed mitigation for the

increased enrollment. In combination, the Applicant proposes mitigation in the form of geometrical and signalization improvements at the intersection of River Road and Royal Dominion Drive, as well as operational strategies such as increased busing and staggered arrival and departure times.

Staff has received correspondence in opposition to the proposed Major Modification from the surrounding neighborhood during the course of review, mostly from the Al-Marah community that is located south of River Road between Royal Dominion Drive and Burdette Road. The community's main concern is that the proposal will result in additional trips on River Road which already experiences heavy traffic in the morning and afternoon hours. The Transportation Impact Study and Transportation Management Plan propose mitigation to improve the intersection, which has been reviewed by staff from Planning, Montgomery County Department of Transportation (MCDOT), and Maryland State Highway Association (SHA).

SECTION 2: RECOMMENDATIONS AND CONDITIONS

SPECIAL EXCEPTION MAJOR MODIFICATION NO. CBA-1174-E

Staff recommends approval of Holton Arms School, Special Exception Major Modification No. CBA-1174-E¹, to allow the following: 1) an increase in enrollment cap from 670 to 870 students, 2) an increase in summer camp enrollment cap from 665 to 970, 3) use of its facilities by third-party users, and 4) incorporate previous Board of Appeals administrative approval regarding Granger House, subject to the following conditions:

1. The approval is limited to a Private Educational Institution for up to 870 students and 236 staff, a Summer Camp for up to 970 attendees, rental of facilities to third-parties, and activities ancillary and related to these uses including administrative offices, library, performing arts center, activity fields, etc.
2. Before the Applicant implements the increased enrollment for the School or Summer Camp, the Applicant must receive approval from the Planning Board for an amendment to Preliminary Plan No. 119871710 to modify the condition limiting enrollment and to clarify that the determination of adequate public facilities has been and will continue to be made with the Special Exception Case No. CBA-1174 as amended.
3. The Applicant must amend Final Forest Conservation Plan No. CBA-1174-D for any disturbance associated with the transportation improvements as may be approved by the Hearing Examiner which may include the intersection improvements described in Condition 5 & 6 below. The

¹ While the major modification request is being jointly referred to as CBA-1174-E, there are other special exceptions that are related and have been jointly approved over the years and to ensure consistency, the associated special exception case numbers have been included in the application and noticing and this approval does not affect the associated approvals. These case numbers include S-2467-A, S-2503-B, S-516 and S-729.

amendment must be reviewed and approved concurrently with the required amendment of Preliminary Plan No. 119871710.

4. Rental of Facilities: Campus facilities including the swimming pool, activity fields, performing art spaces, indoor facilities, classrooms, basketball courts, may be rented to youth programs, other independent schools or non-profit/arts/community organizations, subject to the following limitations:
 - a) Rental of indoor facilities must limit arrival and departure to outside of peak hours of 7:15-8:15 A.M. and 3:30-4:30 P.M. during the school year and 2:30-3:30 P.M. during the summer.
 - a) No parking in the neighborhood.
 - b) Activity fields/tennis courts are subject to the following restrictions
 - i. from 9:00 am-4:00 pm on weekends
 - ii. from 4:00 P.M.-7:30 P.M. on weeknights
 - iii. up to 10 outside tournaments per year
 - iv. Participants are limited to 250
5. Before any enrollment cap is increased, the Applicant must fully construct and complete the following improvements, including associated signal timing adjustments, identified by SHA and MCDOT, and provide verification of the bond release relating to the improvements:
 - a) The extension of the westbound right turn lane on River Road as described in the LATR study.
 - b) The addition of the northbound left turn lane at Royal Dominion Drive and River Road, as described in the LATR study.
6. Before any enrollment cap is increased, the Applicant must install a bus shelter at the existing bus stop along the Property frontage on River Road.
7. Transportation Management Plan
The Applicant must adhere to the updated Transportation Management Plan subject to the following:
 - a) In the event the School fails to meet the busing goal of 36% of students riding the bus during the school year, the School will implement corrective measures, which could include adding buses and/or bus routes as necessary to comply with the busing goal.
 - b) Establish a bus ridership goal of 16% for Summer Camp bus operations. In the event the School fails to meet the busing goal of 16% of students riding the bus during the summer, the School will implement corrective measures which could include adding buses and/or bus routes as necessary to comply with the busing goal.
 - c) The Applicant must provide an annual monitoring report with the information as described within the TMP to Planning Staff, MCDOT, the Board of Appeals and/or the Office of Zoning and Administrative Hearings (OZAH).
 - d) Amend the Transportation Management Plan to include:
 - i. Establish a maximum number of student driver parking permits of 85.
 - ii. Annual reporting on the use of the campus facilities to specify the timing of activities to ensure the arrivals and departures maintain limitations noted in Condition 4.

SECTION 3: NEIGHBORHOOD & SITE DESCRIPTION

VICINITY/NEIGHBORHOOD

The Holton Arms School (the “School”) is located on the north side of River Road (MD-190), approximately ¼ mile east of the Interstate 495 access ramp. Located on the south side of River Road (MD-190), opposite the Holton Arms School, is Royal Dominion Drive which serves as one of the two entrances into the Al Marah neighborhood of single family and townhomes. The second entrance into this community is off Burdette Road to the east. Single family homes surround the School, with the Burning Tree Country Club further to the west of Burdette Road. The area to the north, south and west is zoned R-200. Several other single-family neighborhoods exist to the east, which are zoned R-90, as well as other public and private schools including Burning Tree Elementary School, the Landon School, Thomas W. Pyle Middle School, and Saint Bartholomew School.

As shown in Figure 2 below, Staff defined a neighborhood for purposes of analyzing this Special Exception and its possible impacts on the character of the surrounding area. Staff determined the neighborhood based on nearby and surrounding properties that are in close proximity to the Holton Arms School, and that would be most impacted by the Special Exception Major Modification.



Figure 2: Vicinity Map with Staff-defined neighborhood

Staff defines the surrounding neighborhood as Interstate 495 and the Burning Tree Club to the west. Darby Road to the north, Winterberry Lane to the east (north of River Road (MD-190)), Nevis Road to the east(south of River Road (MD-190)), and Hidden Creek Road to the south (Figure 2). This general neighborhood is predominantly residential single-family detached homes with two other primary schools, a private golf course, a local park, and natural resources such as Booze Creek that runs north south through the neighborhood boundary.

Staff identified three existing, approved conditional use/special exceptions within the defined neighborhood:

CBA 2373, to allow the Burning Tree Country Club.

S-2504, to allow a continuing care retirement community for the elderly and/or handicapped persons at the northwestern corner of Burdette Road and River Road (MD-190).

S-824, to allow the American Plant Garden Center retail nursey at the northeastern corner of Burdette Road and River Road (MD-190).

S-458, to allow the operation of a charitable institution within a block along Winterberry Place.

PROPERTY DESCRIPTION

The Subject Property is located at 7303 River Road, in Bethesda, on the north side of River Road (MD-190), east of Burdette Road. The Property is approximately 54.6 acres in size, as recorded in Plat No. 24741 in the Land Records of Montgomery County. The Property is split zoned R-200 to the west and R-90 to the east, and within the 1990 *Bethesda-Chevy Chase Master Plan* area.

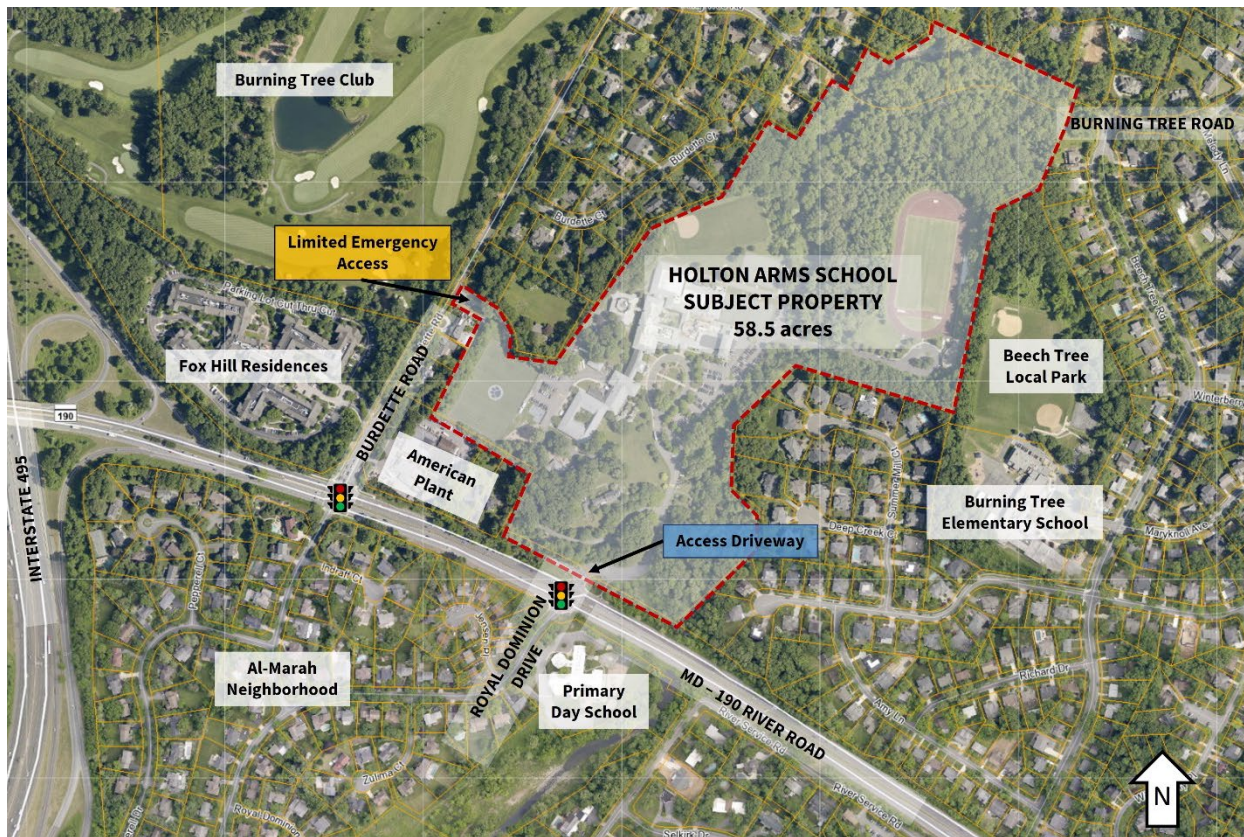


Figure 3 – Aerial of Subject Property (red dashed line)

The Property has approximately 770 feet of frontage on River Road (MD-190), and 110 feet of frontage along Burdette Road, and at its most northern extent the Property has frontage long Burning Tree Road at the intersection of Beech Tree Road. The Site contains a range of topography, with steep slopes that serve as significant buffers between the School uses and adjacent neighborhood.

The Property is improved as the Holton Arms School Campus which includes one main vehicular access drive from River Road (MD-190) an internal road network and a pedestrian sidewalk. There is a secondary access point off of Burdette Road which is limited to emergency vehicles only. The Campus contains several buildings including the Lower School, Middle and Upper Schools, dining facility, Gym, pool, theater, the Brown House, Granger House, 3 activity fields, tennis courts, and maintenance sheds. The Holton Arms School operations are outlined below in Section 4: Project Description, which includes a childcare facility (S-2467-A), school for grades 3 through 12, a summer school, and third party use of the onsite facilities.



Figure 4 – Diagram of Holton Arms Campus Facilities

The Site contains a stream, known as Booze Creek, and its associated stream buffer. The stream, which is a tributary to the Cabin John Creek main stem, bisects the Property from north to south and is a Use Class I watershed. The Property also contains a portion of the 100-year floodplain, hydraulically-adjacent steep slopes, and Category I Forest Conservation Easements. The Site drains to the Cabin John Creek watershed, and is not within a Special Protection Area. No known historic features, or rare threatened or endangered species exist on site.

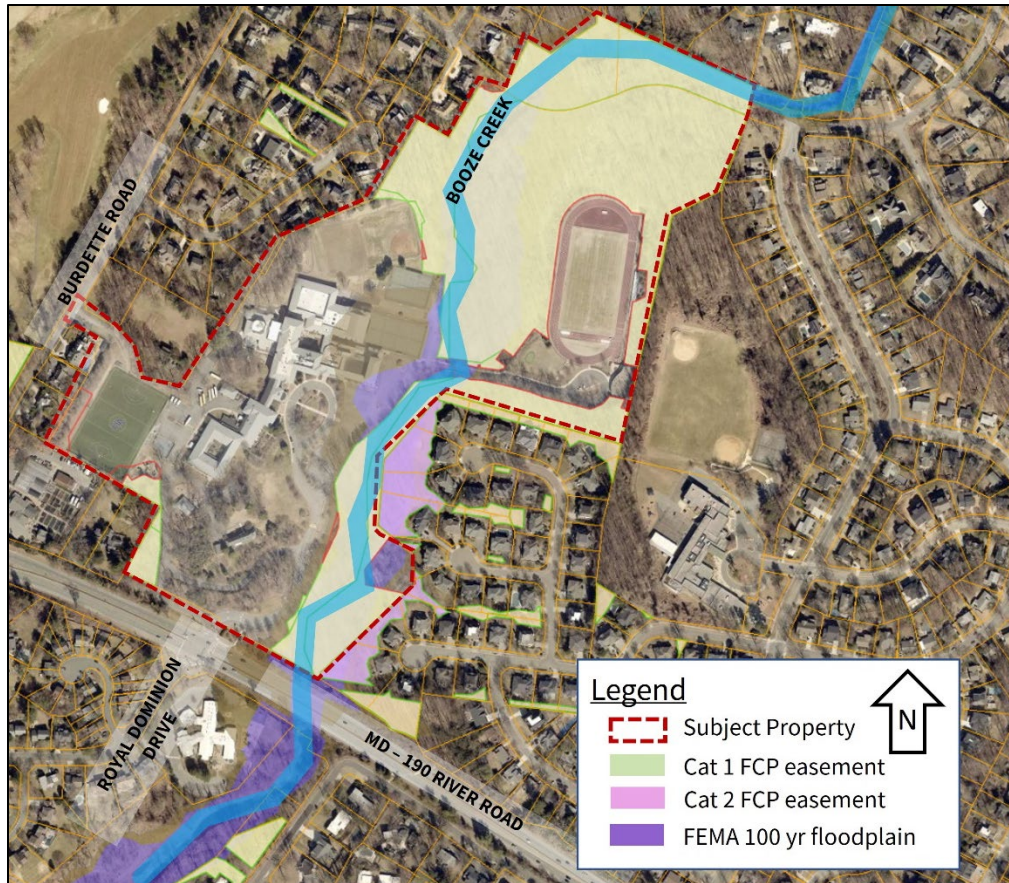


Figure 5 – Subject Property with Forest Conservation Easements and Booze Creek

SECTION 4: PROJECT DESCRIPTION

PREVIOUS APPROVALS

The School has received several approvals over the years for operations. While the Major Modification request is being jointly referred to as CBA-1174-E, there are other special exceptions that are related and have been jointly approved over the years, and to ensure consistency, the associated special exception case numbers have been included in the application and noticing. These case numbers include S-2467-A, S-2503-B, S-516 and S-729.

CBA-1174

In November of 1961, CBA-1174 was approved by the Board of Appeals to allow a private educational institution for the Holton Arms School.

In March of 1985, a modification to CBA-1174 was approved to construct a maintenance building.

In April of 1985, a modification to CBA-1174 was approved to allow a daycare center for 8-10 children for faculty and staff.

In May of 1987, Case No. CBA-1174-A was approved to allow an enlargement to the soccer field.

On August 27, 1987, the Board of Appeals approved a modification to CBA-1174-A to allow the construction of a performing arts center, gymnasium, athletic field/tennis courts.

In April of 1994, Case No. CBA-1174-B was approved to allow an increase in enrollment to 650 students, additions for a semi-detached elevator tower, bathrooms and kitchen facilities, regrading of athletic fields, construction of tennis courts, and improvements to internal driveways and recreation areas.

In August of 1995, a modification to CBA-1174B was approved for a new maintenance building.

In October of 1996, a modification to CBA-1174B was approved for changes to school signage.

In August of 1998, a modification to CBA-1174B was approved for construction of entry walls, piers, and gates.

On March 1, 2001, the Planning Board approved Forest Conservation Plan No. CBA-1174-C to allow the associated improvements with the proposed school expansion, which required Category I Forest Conservation Easements, a Tree Save plan, and stream restoration measures.

On May 29, 2002, the Board of Appeals approved Case No. CBA-1174-C to allow the construction of a new athletic field and track facility, a new science wing, expansion of the performing arts center, an addition to the lower school building, and a centennial garden.

On March 23, 2004, the Board of Appeals approved Case No. CBA-1174-D (S-2467-A, and S-2503-A) to allow the continuation of after school programs, increase in general enrollment from 650 to 665, and an additional 5 students if circumstances warranted, based on the previous conditions set forth.

On April 16, 2008, the Board of Appeals approved a modification to Case No. CBA-1174-D to allow the extension of the school's education program through summer participation in an international exchange program with 24 tennis players for the 2008 summer and future summers, and the use of meeting space at Holton Arms by the neighboring Fox Hill Sunrise Community on Saturdays.

On May 7, 2008, the Board of Appeals approved a modification to Case No. CBA-1174-D to allow the school to host up to 4 enrichment programs per year, such as lectures or discussions, outside of normal operating hours.

On May 2, 2013, the Planning Board approved Forest Conservation Plan No. CBA-1174-D in response to a violation, which allowed modifications to existing Category I Forest Conservation Easements.

On May 25, 2022, the Board of Appeals approved a modification to Case No. CBA-1174-D to allow the addition of an indoor and outdoor space in connection to the School's library renovation.

On May 25, 2023, Planning Staff approved a redline to Forest Conservation Plan No. CBA-1174-D for additional Limits of Disturbance associated with the indoor and outdoor space and library renovation.

Case No. S-516

In 1976, the Board of Appeals approved Case No. S-516 to allow a playground, small vehicle parking area, and an access road to Burdette Road.

Case No. S-729

In 1980, the Board of Appeals approved Case No. S-729 to allow an addition of a library on the property.

Preliminary Plan No. 119870171

In 1987, the Planning Board approved Preliminary Plan No. 119870171 to create one lot totaling 54.6 acres for the Holton Arms School with right-of-way dedication on River Road and emergency access on Burdette Road, limiting enrollment to 630 students.

Case No. S-2503

On June 20, 2002, the Board of Appeals granted a special exception to permit a summer camp for up to 645 children and 160 staff on the Holton Arms School campus. The summer camp had operated in the past on the school campus as an accessory activity to Special Exception CBA-1174.

On March 23, 2004, Case No. S-2503-A was approved by the Board of Appeals to allow an increase in summer camp enrollment from 645 to 665.

Case No. S-2467

On August 8, 2002, the Board of Appeals granted a special exception to permit a child care facility for the benefit of Holton Arms School faculty and staff.

On March 12, 2014, the Board of Appeals adopted a resolution (S-2467-A) to allow the child care facility to increase to 31 children with 10 staff.

Existing approved operations for Holton Arms Campus

Based on the series of approvals and modifications mentioned above, the current operations allowed for the Holton Arms Campus are as follows:

CHILD CARE FACILITY

The childcare facility is limited to 31 children and 10 staff.

SUMMER CAMP

The Summer camp is limited to 670 campers.

HOLTON ARMS SCHOOL

Student enrollment is limited to 665 students, with 5 additional students if circumstances are warranted. The Holton Arms School is required to submit a School's Annual Report every year to the Board of Appeals reporting on the student enrollment and the criteria within the existing Transportation Management Plan that was approved in 2004. The School has submitted this report annually, demonstrating compliance with the enrollment cap, except for two exceptions, for the 2018-2019 and 2024-2025 school years. These reports indicate there were higher-than-normal yield rates with 678 students attending in 2018-2019 and 681 students for the 2024-2025 school year. These reports state that the higher admission was due to lower-than-usual attrition rates. In the 2024-2025 report, it was stated that rather than using mitigation strategies to return to the restricted enrollment cap, the School intended to seek approval to increase enrollment to meet the growing demand.

THIRD-PARTY USE OF FACILITIES

Swim (Opinion Dated April 26, 2002):

The pool may be used for supervised swim programs operated by Curl Burke and The Capital Sea Devils for Holton Families and students of schools without pools that compete against Holton in swimming, provided that such programs are conducted on a cost-sharing basis during non-peak hours, subject to the following conditions:

- No more than 40 swimmers at any one time.
- Weekdays: limited to one (1) morning and one (1) evening session. Morning session shall end before 7:30 A.M. Evening session shall not begin until after 5:00 P.M.
- A parent-driver who has a student enrolled in the early morning session may swim during that session, provided that he is counted within the 40-swimmer limit.
- Include in its quarterly reports to the Board the names of schools attended by all the swimmers and a list of schools against which Holton will compete in swimming in that academic year.
- May accept compensation from Curl-Burke and the Capital Sea Devils in an amount no greater than the proportion of the maintenance and operating costs for the pool and related aquatic facilities directly related to such use.

School arts programming (Opinion Dated April 26, 2002):

School arts programming, identified as the Center for the Arts, is limited as follows:

- No more than 20 non-Holton Family participants shall be on campus for this program at any one time, and there shall be at least an equal number of Holton student participants
- At least 50% must be Holton families
- All non-Holton family participants shall arrive and depart during non-Peak Hours

Athletic Field and Track (Opinion Dated May 29, 2002):

The limitation of the new athletic field and track is as follows:

- For classes, school functions, practices, interscholastic competitions (35 per year), conference championships (once per year and one (1) match per weekday and two (2) per weekend day)
- No use from 6/15-8/3, except for try outs and sports practices
- Seating is limited to 200 seats

PROPOSAL

The Applicant proposes to 1) increase enrollment cap from 665 to 870 students, 2) increase summer camp enrollment from 665 to 970 campers, 3) allow flexibility in use of facilities by school and third-party users, and 4) incorporate previous Board of Appeals administrative approval regarding Granger House, with no physical changes onsite. With these modifications, the Applicant is not proposing to make any physical modifications to the Subject Property.

ENROLLMENT CAP INCREASE

The School and summer camp has been limited to an enrollment cap of 665 students, with an additional 5 students if circumstances exist, since 2004. In its most recent enrollment for 2024-2025 school year, the School experienced the highest yield rate of 681 students while maintaining a low attrition rate. The School wishes to increase capacity by 200 students, with no physical expansion, to accommodate the growing demand. The Applicant states that the existing size of the School is more than sufficient to accommodate the increase in students, with 73 existing classrooms and 5 existing specialized spaces that have a maximum capacity of up to 1400 students, the current enrollment of 670 has a space utilization rate of 47%, and the optimal utilization rate (per the National Center for Education Statistics) is between 75-90%. With the proposed increase in enrollment to 870 students, the utilization rate increases to 60%. There are currently 225 staff for the Holton Arms School, with the increased enrollment there will be 11 additional staff, bringing the new total to 236 staff. The summer camp was also limited to 665 campers, and the Applicant is requesting to increase enrollment to 970

campers. There are no proposed changes to the childcare facility, which still exists onsite and is currently limited to 31 children and 10 staff.

THIRD PARTY USE OF FACILITIES

As summarized in the previous approvals section above, the use of the School's facilities are subject to several limitations. The Applicant proposes to lift many of those restrictions for the use by the School and to allow rental of these facilities to other youth programs and independent schools. The School will limit arrival and departures to outside of peak hours. Specific changes proposed are as follows:

Swim:

- Eliminate participant limit
- Eliminate time restrictions, subject to umbrella limitations

School arts programming:

- Eliminate non-Holton family restrictions

Athletic Field and Track:

- Eliminate the limit of interscholastic events per year
- Maintain a 200-seat limit and set an overall participation limit of 250
- Rental of athletic facilities will be subject to the following restrictions:
 - from 9:00 A.M. – 4:00 P.M. on weekends
 - from 4:00 P.M. – 7:30 P.M. on weeknights
 - up to ten (10) outside tournaments per year

GRANGER HOUSE

Of the many structures on the Holton Arms Campus, the Granger House (Identified as 'G' on Figure 4 above) has been used as a residence for the Head of School. As part of the Major Modification application, the Applicant proposes to formally recognize the Granger House as an accessory use for administrative offices related to the School. The Granger House was approved to be used temporarily as administrative offices with administrative approval on July 26, 2023. The approval stated that the Granger House would be temporarily used as administrative offices while the Library was being renovated. Once the Library renovations were complete the Granger House would once again be used as a residence. However, the School proposes to maintain the use of the Granger Residence as an administrative office.

ACCESS AND CIRCULATION

The existing access and circulation are proposed to remain unchanged with the increased enrollment. As shown in Figure 6 below, vehicular access to the Site is from Royal Dominion Drive at the

intersection of River Road (MD-190), which becomes a private driveway with access to the parking and pick-up/drop-off areas. Figure 6 below shows the available queuing space on the site and the pick-up/drop-off areas. Figure 6 shows that there is 1,700 feet of queuing space for the Lower School and 2,075 feet of queuing space for the Upper School. In addition, there is 1,480 feet of queuing space available to be used for the Upper School, and 525 feet of queuing space that could be used for both schools.

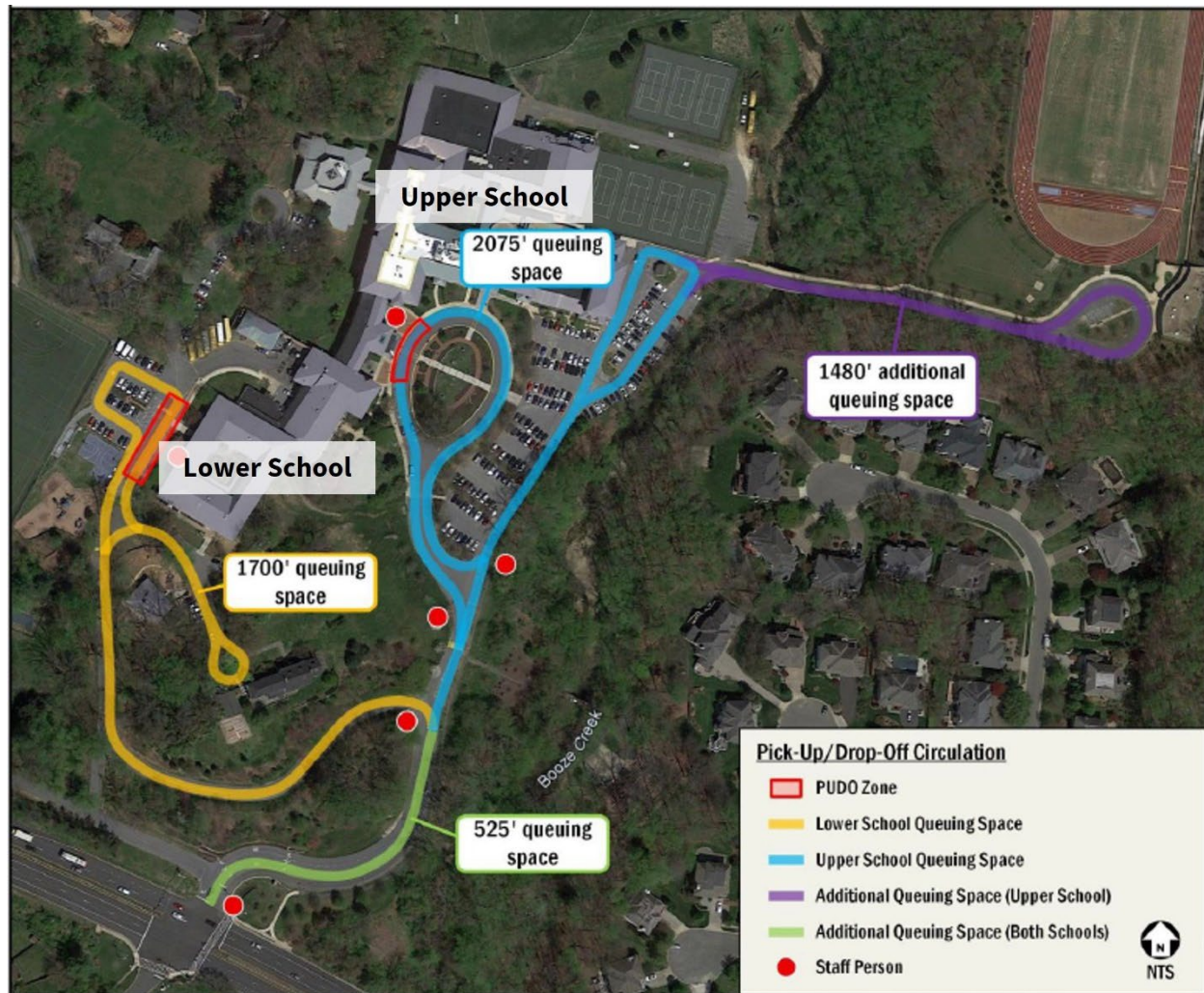


Figure 6 – Applicant’s Circulation Diagram showing pick-up / drop off zones and queuing onsite

The Applicant’s consultant conducted a site visit on a typical school day in November 2024 to observe site circulation and queuing. This site visit observed that all queuing was contained within the site, and it was determined that the additional queuing generated from the proposed increased enrollment can be accommodated on site without spillback onto River Road.

There are 310 parking spaces distributed throughout the Site. Of these spaces, 85 parking permits are currently issued to student drivers. There will be no increase in student parking permits with the proposed enrollment increase. Additionally, for large events, the school has agreements with three

nearby partners² to accommodate overflow parking of up to 160 spaces. During these large events, shuttles are provided from the off-site parking locations.

To minimize traffic impacts on the surrounding community and to promote sustainable transportation, the School prepared an updated Transportation Management Plan (TMP) (Attachment B). This TMP includes transportation demand management (TDM) strategies that aim to reduce the number of trips generated by the increased enrollment. Some of these strategies include but are not limited to:

- Increase in bus ridership levels
- Carpooling and transit incentives for students and faculty/staff
- Staggered start/end times for summer programming

The current bus ridership for the school is 28%, and the target bus ridership with the proposed increased enrollment is 36% (313 students of the 870 proposed enrollment). The school will operate a minimum of 12 bus routes during the school year and a minimum of seven (7) bus routes during the summer and will implement two (2) new bus routes as needed for both the school year and summer. More specifics on the TDM strategies can be found in the TMP.

To ensure that this TMP is functioning as intended, Staff recommends a condition requiring the School to submit a Transportation Management Report every year to Planning, MCDOT, SHA, and the Board of Appeals and/or Hearing Examiner.

The Applicant's Consultant prepared a traffic study that demonstrated that the intersections studied are within the standards per the LATR Guidelines. However, additional queuing studies were requested by MDOT-SHA. This showed that queueing exceeded available storage lengths even in the existing conditions. To address the deficiencies in the current and future conditions, the Applicant will be extending the westbound right turn lane on River Road and adding a northbound left turn lane at Royal Dominion Drive and River Road intersection.

ENVIRONMENT

The previous approvals for the Project include Forest Conservation Plan No. CBA-1174-D, most recently modified in 2023 for the indoor and outdoor learning space and library renovations. The Project does not propose any physical changes onsite but does require improvements to the intersection of Royal Dominion Drive and River Road. These improvements must be shown on the associated forest conservation plan, which must be amended as part the recommended conditions of approval.

² The school has agreements with St. Bartholomew's Catholic Church, St. Mark's Orthodox Church, and Primary Day School to accommodate overflow parking for special events.

SECTION 5: COMMUNITY CORRESPONDENCE

The Applicant reached out to the Bradley Boulevard Citizens Association as well as immediate neighbors in the vicinity regarding the proposed Major Modification. Most recently, the School hosted a Virtual Community Meeting on September 9, 2025 prior to resubmitting the revised Transportation Impact Study and Transportation Management Plan.

Staff has received significant correspondence in opposition to the proposed Major Modification from the surrounding neighborhood during the course of review. A predominant amount of the letters received are from the Al-Marrah community that is located south of River Road between Royal Dominion Drive and Burdette Road. The main concern is that the existing conditions of River Road during peak hours result in significant delays, and that any increase in school enrollment will exacerbate these conditions. The residents state that the community is often used as a cut-through to avoid backups on River Road, resulting in eastbound cars exiting River Road onto Burdette Road and driving through the neighborhood to exit at Royal Dominion Drive. The existing roads within the community do not have sidewalks, and residents are concerned for the safety of those walking on the street.

Staff Response: Based on the traffic counts collected in January 2024, the vast majority of peak-hour trips into and out of the School are from River Road. Three percent (3%) (15 vehicles) of A.M. trips into the school come from the south on Royal Dominion Drive, and four percent (4%) (7 vehicles) of P.M. trips. Counts leaving the school show that six percent (6%) (18 vehicles) in the A.M. are going south on Royal Dominion Drive and only one (1%) (4 vehicles) in the P.M. The Transportation Impact Study (TIS) found that queueing exceeded available storage lengths even in the existing conditions at the intersection of River Road and Royal Dominion Drive. The State Highway Administration (MDOT-SHA) has requested the Applicant to construct intersection improvements in the directions where queueing is failing in order to improve movement throughout the corridor. To address the deficiencies in the current and future conditions, the Applicant will be extending the westbound right turn lane on River Road and adding a northbound left turn lane at Royal Dominion Drive and River Road. These improvements will mitigate the increase in trips from the School's increased enrollment, and also improve general movement along the corridor. Staff has recommended that a condition requiring these intersection improvements, including signal phasing modifications, occur before the School's enrollment cap is increased.

The community requests further mitigation by the School to offset the increased enrollment, such as mandated busing, the installation of signage within the community restricting through traffic during weekday peak hours, and the installation of license plate monitors.

Staff Response: Staff is recommending conditions of approval that will require the Applicant to commit to the busing percentages that were studied and proposed within the Transportation Impact Study (TIS) and Transportation Management Plan (TMP). The TMP includes general transportation demand management (TDM) strategies as well as specific TDM strategies for students including

carpooling, busing, incentives, and education and outreach. The TMP requires the Applicant to provide an annual monitoring report that includes the percentage of students being bused to school, and if the percentage goal is not met, the specific TDM strategies are subject to change to meet the busing goals. Installation of signage on public streets is facilitated by MCDOT, based on the letter received by MCDOT, there were no recommendations for additional street signage.

SECTION 6: FINDINGS

SPECIAL EXCEPTION MAJOR MODIFICATION NO. CBA-1174-E

Special Exception Case No. CBA-1174 was originally approved by the Board of Appeals in 1961 and has been modified several times based on the findings contained in Section 59-G-2.19³. The Applicant proposes to modify the existing approval to allow: 1) an increase in enrollment cap from 665 to 870 students, 2) an increase in summer camp enrollment cap from 665 to 970, 3) flexibility in use of facilities by third-party users, and 4) incorporate previous Board of Appeals administrative approval regarding Granger House, with no physical changes onsite. The proposed Special Exception Major Modification Case No. CBA-1174-E does not alter the intent of the previous findings of CBA-1174-D, which remain applicable, except as modified below.

1. Per Section 59-G-2.19 Educational Institutions, Private.

(a) Generally, a lot, tract or parcel of land may be allowed to be used for a private educational institution if the board finds that:

- (1) the private educational institutional use will not constitute a nuisance because of traffic, number of students, noise, type of physical activity, or any other element which is incompatible with the environment and character of the surrounding neighborhood;**

The Holton Arms School has been in existence on the Subject Property for over 60 years, predating many of the neighboring homes in the area. The School and neighborhoods have grown together over the years and are part of the character of the surrounding community. The proposed increase in enrollment and use of the facilities will not constitute a nuisance, as the Transportation Impact Study demonstrates that the proposed changes can be accommodated within the area-wide road network. While the Major Modification proposes operational changes to use of the facilities by third party groups it will not impact or cause a nuisance as the operational elements relating to the previously established 200-seating limitation from conditions of approval of CBA-1174-C.

- (2) except for buildings and additions completed, or for which a building permit has been obtained before (date of adoption [April 2, 2002]), the private educational**

³ Application was reviewed based on the Zoning Ordinance in effect on October 29, 2014 per Section 59.7.7.1.B of the Zoning Ordinance.

institution must be in a building architecturally compatible with other buildings in the surrounding neighborhood, and, if the private educational institution will be located on a lot, tract, or parcel of land of 2 acres or less, in either an undeveloped area or an area substantially developed with single-family homes, the exterior architecture of the building must be similar to a single-family home design, and at least comparable to any existing homes in the immediate neighborhood;

The Major Modification does not propose any new buildings, additions, or physical changes to the Site. The existing buildings on the Site have been reviewed for conformance and compatibility in previous modifications to the original Special Exception Case No. CBA-1174.

- (3) the private educational institution will not, in and of itself or in combination with other existing uses, affect adversely or change the present character or future development of the surrounding residential community;***

The Major Modification will not adversely change the present character of the surrounding residential community, as the School has existed within the community for several decades. The requested increase in School and Summer Camp enrollment will not alter the present character as there will be no new development necessary to accommodate the increase in students. The Applicant has also requested flexibility for the use of the facilities by third party groups, but has set limitations on the use of the facilities such as limiting hours and number of events per year to ensure this flexibility will not adversely change the present character or future development of the surrounding residential community.

- (4) the private educational institution must conform with the following standards in addition to the general development standards as specified in Section 59-G-1.23:***

- a. Density – The allowable number of pupils per acre permitted to occupy the premises at any one time must be specified by the Board considering the following factors:***
 - a. Traffic patterns, including:***
 - a) Impact of increased traffic on residential streets;***
 - b) Proximity to arterial roads and major highways;***
 - c) Provision of measures for Transportation Demand Management as defined in Section 42A-21 of the Montgomery County Code;***
 - d) Adequacy of drop-off and pick-up areas for all programs and events, including on-site stacking space and traffic control to effectively deter queues of waiting vehicles from spilling over onto adjacent streets; and***
 - b. Noise or type of physical activity;***
 - c. Character, percentage, and density of existing development and zoning in the community;***

- d. Topography of the land to be used for the special exception; and***
- e. Density greater than 87 pupils per acre may be permitted only if the Board finds that (i) the program of instruction, special characteristics of students, or other circumstances justify reduced space and facility requirements; (ii) the additional density will not adversely affect adjacent properties; (iii) additional traffic generated by the additional density will not adversely affect the surrounding streets.***

The Major Modification proposes an enrollment increase to up to 870 students for the school year, and an increase of up to 970 campers for the summer camp, and flexibility for third-party use of the campus facilities. With 58.5 acres of property, this equates to a population density of 14.87 students per acre for the school year, and 16.5 campers per acre for the summer camp, well below the 87 students per acre maximum density allowed under §59-G-2.19(a)(4)a.5 of the 2004 Zoning Ordinance.

The School is located off River Road (MD-190) and is less than half a mile from the Capital Beltway (I-495). There are many residential areas and streets near the Site, however, access to the Site is from River Road and does not require traveling on any of the residential streets. Based on the traffic counts collected in January 2024, the vast majority of peak-hour trips into and out of the school are from River Road. Only three percent (3%) (15 vehicles) of A.M. trips into the school come from the south on Royal Dominion Drive, and only four percent (4%) (7 vehicles) of P.M. trips. Counts leaving the school show that six percent (6%) (18 vehicles) in the AM are going to the south on Royal Dominion Drive and only one percent (1%) (4 vehicles) in the P.M.. As stated above in the Access and Circulation section, the School has provided Transportation Demand Management measures as described in detail in the Transportation Management Plan for many years and will continue to do so. Also detailed in the Access and Circulation section, the School has demonstrated that the drop-off and pick-up areas are adequate for the proposed enrollment increase.

As part of the Major Modification application, the Applicant requests to formally recognize the Granger House as an accessory use for administrative offices related to the School. The Granger House was approved to be used temporarily as administrative offices with administrative approval on July 26, 2023. The approval stated that the Granger House, which was originally an on-campus residence for the Head of School, would be temporarily used as administrative offices

while the Library was being renovated. Once the Library renovations were complete, the Granger House would once again be used as a residence. However, the School now wishes to maintain the use of the Granger Residence as an administrative office. The proposed change of use will not substantially change the nature, character, or intensity of the use, as the Granger House is located well within the School property, setback from River Road and the surrounding neighborhood. Additionally, the School has used the House as an administrative office on a temporary basis without impacting the surrounding neighborhood. While the Applicant's Statement of Justification states that staffing for the School is anticipated to grow from 225 to 236, this is due to the increased enrollment and unrelated to the request for recognizing the Granger House as an accessory use for administrative offices.

- b. Buffer – All outdoor sports and recreation facilities must be located, landscaped, or otherwise buffered so that the activities associated with the facilities will not constitute an intrusion into adjacent residential properties. The facility must be designed and sited to protect adjacent properties from noise, spill light, stray balls and other objectionable impacts by providing appropriate screening measures, such as sufficient setbacks, evergreen landscaping, solid fences and walls.***

The existing sport and recreation facilities on Holton Arms Campus are setback from the property lines and well buffered with slope, forest, and landscaping. The activity field is located adjacent to Burning Tree Local Park to the east, which acts as a buffer to nearby single-family homes, and Booze Creek and the surrounding forest buffers the activity field to the north and west from other single-family homes. The previous approvals for the Special Exception and Forest Conservation Plan include established Category 1 Forest Conservation Easements that protect these buffers.

- (b) If a Private Educational Institution operates or allows its facilities by lease or other arrangement to be used for: (i) tutoring and college entrance exam preparatory courses, (ii) art education programs, (iii) artistic performances, (iv) indoor and outdoor recreation programs, or (v) summer day camps, the Board must find, in addition to the other required findings for the grant of a Private Education Institution special exception, that the activities in combination with other activities of the institution, will not have an adverse effect on the surrounding neighborhood due to traffic, noise, lighting, or parking, or the intensity, frequency, or duration of activities. In evaluating traffic impacts on the community, the Board must take into consideration the total cumulative number of expected car trips generated by the regular academic program and the after school or summer programs, whether or not the traffic exceeds the***

capacity of the road. A transportation management plan that identifies measures for reducing demand for road capacity must be approved by the Board. The Board may limit the number of participants and frequency of events authorized in this section.

With the Special Exception modification Case No. CBA-1174-C, approved by the Board of Appeals on March 23, 2004, the Board found that the Holton Arms School could operate with a maximum enrollment of 665 students during the academic year and 665 summer camp participants, and that these activities, in combination with other activities, would not have an adverse effect on the surrounding neighborhood. The Major Modification being requested by the Applicant requests these enrollments to increase to 870 students for the school year and 970 campers for the summer, and flexibility for use of the facilities by third party groups, with no physical changes occurring to the Site. The Applicant has provided a Transportation Impact Study demonstrating the traffic impacts on the community for the proposed increase in enrollments and use of facilities, and how the increased trips will be mitigated through physical intersection improvements, signalization improvements, and implementation of a Transportation Management Plan (TMP) with goals for busing and carpooling. The TMP includes general transportation demand management (TDM) strategies as well as specific TDM strategies for students including carpooling, busing, incentives, and education and outreach. The TMP requires the Applicant to provide an annual monitoring report that includes the percentage of students being bused to school, and if the percentage goal is not met, the specific TDM strategies are subject to change to meet the busing goals. Conditions are proposed to limit the number of students and campers and limit the hours of operation for these uses as well as the use of the recreational facilities by the School itself and by third parties. There are no changes proposed to the Subject Property, which currently has no lighting on their athletic fields and tennis courts, which limits these activities to daylight hours. With these limitations, the uses on the Property will not have an adverse impact on the surrounding neighborhood. See discussion above for Finding 1(a).

(c) Programs Existing before April 22, 2002.

- (1) Where previously approved by the Board, a private educational institution may continue the operation of (i) tutoring and college entrance exam preparatory courses, (ii) art education programs, (iii) artistic performances, (iv) indoor and outdoor recreation programs, or (v) summer day camps, whether such programs include students or non-students of the school, if the number of participants and frequency of events for programs authorized in 59-G-2.19(b) are established in the Board's approval.***
- (2) Where not previously approved by the Board, such programs may continue until April 22, 2004. Before April 22, 2004, the underlying special exception must be modified to operate such programs, whether such programs include students or non-students of the school. The Board may establish a limit on the number of participants and frequency of events for authorized programs.***

Special Exception Case No. CBA-1174 has been modified numerous times since its

original approval to reflect the growing operations of Holton Arms School. Over the years certain operations were required to receive separate special exception approvals, such as Case No. S-2467 to allow a childcare facility, and Case No. S-2503 to allow a summer camp. These special exceptions have been modified concurrently with Special Exception Case No. CBA-1174, and this particular Major Modification includes modification to Case No. S-2503 for the increase in summer camp enrollment to up to 970 campers, and has included all associated case numbers for clarity and record keeping purposes. This Modification also includes the operational hours of recreation programs and facilities.

(d) Site plan.

- (1) In addition to submitting such other information as may be required, an applicant shall submit with his application a site plan of proposed development. Such plan shall show the size and shape of the subject property, the location thereon of all buildings and structures, the area devote to parking and recreation facilities, all access roads and drives, the topography and existing major vegetation features, the proposed grading, landscaping and screening plans and such other features necessary for the evaluation of the plan.**
- (2) No special exception, building permit or certificate of occupancy shall be granted or issued except in accordance with a site plan of development approved by the board. In reviewing a proposed site plan of development the board may condition its approval thereof on such amendments to the plan as shall be determined necessary by the board to assure a compatible development which will have no adverse effect on the surrounding community, and which will meet all requirements of this chapter. Any departure from a site plan of development as finally approved by the board shall be cause for revocation of the special exception, building permit or certificate of occupancy, in the manner provided by law.**

The Applicant provided a Site Plan previously approved for the Special Exception Case No. CBA-1174. There is no new development or physical changes proposed onsite as part of this Major Modification request. The Applicant proposes offsite roadway geometrical improvements within the existing right-of-way as part of the mitigation as identified in the Project's LATR review. This mitigation will not impact the previously approved Site Plan.

2. Per Section 59-G-1.21, to approve a special exception application, the Hearing Examiner must find that the proposed development:

- (1) Is a permissible special exception in the zone.**

Educational Institution, Private is allowed in the R-200 & R-90 Zone as a Special Exception per Section 59-C-1.31(c).

- (2) *Complies with the standards and requirements set forth for the use in Division 59-G-2. The fact that a proposed use complies with all specific standards and requirements to grant a special exception does not create a presumption that the use is compatible with nearby properties and, in itself, is not sufficient to require a special exception to be granted.***

The proposed Major Modification Request will not result in any physical changes onsite. As the Holton Arms School exists today, it complies with the standards and requirements for an Educational Institution, Private per Section 59-G-2.19 of the 2004 Zoning Ordinance which was established by the original approval and subsequent modifications for this Special Exception Case No. CBA-1174 over the past 60 years. The School is located within a 58.5 acre Property and the locations of each of the existing buildings are setback well in excess of the required 40 foot minimum foot yard, 15 foot side yard, and 30 foot rear yard setbacks. The existing development provides landscaping, lighting, screening, in conformance with the standards contained in Chapter 59, and the proposed Major Modification does not require any change to these existing development standards.

- (3) *Will be consistent with the general plan for the physical development of the District, including any master plan adopted by the Commission. Any decision to grant or deny a special exception must be consistent with any recommendation in a master plan regarding the appropriateness of a special exception at a particular location. If the Planning Board or the Board's technical staff in its report on a special exception concludes that granting a particular special exception at a particular location would be inconsistent with the land use objectives of the applicable master plan, a decision to grant the special exception must include specific findings as to master plan consistency.***

The Subject Property is located within the 1990 *Bethesda-Chevy Chase Master Plan*. The Plan affirms the existing R-90 and R-200 Zones for the Property and recognizes that private school use may continue on the Property.

- (4) *Will be in harmony with the general character of the neighborhood, considering population density, design, scale, and bulk of any proposed new structures, intensity and character of activity, traffic and parking conditions, and number of similar uses.***

The Holton Arms School will remain in harmony with the general character of the neighborhood when considering population density, design, scale, intensity and character of activity, traffic and parking conditions, and number of similar uses. No new structures are proposed with the Special Exception Modification. While the enrollment is proposed to increase, the changes to traffic and parking conditions are anticipated to be minimal due to proposed intersection improvements and updates

to the Transportation Management Plan. Section 59-E-3.7 of the Zoning Ordinance requires “one parking space for each employee, including teachers and administrators, plus sufficient off-street parking space for the safe and convenient loading and unloading of students, plus additional facilities for all student parking.” The Applicant states that with the expected increase, faculty will increase by 11 for a total of 236 staff. There are 310 existing parking spaces on the School property and the School does not intend to increase parking passes for students with the increased enrollment. Therefore, there should be sufficient parking on the Property.

(5) *Will not be detrimental to the use, peaceful enjoyment, economic value or development of surrounding properties or the general neighborhood at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.*

The Holton Arms School as it exists today will physically remain the same including the existing screening and buffers that surround the Property that provide separation between the School and the general neighborhood. While the proposed Major Modification will allow an increase of enrollment and flexibility of use of facilities, the School’s campus is adequately sized and with existing improvements to accommodate the proposed Major Modification and will not be detrimental to the surrounding properties or general neighborhood.

(6) *Will cause no objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.*

The proposed Special Exception Modification will not cause objectionable noise, vibrations, fumes, odors, dust, illumination, glare, or physical activity at the Property. The increased enrollment for the School and Summer camp, and flexibility of campus operations will be fully contained within existing facilities. Outside activities will be limited to daylight hours and managed by restrictions on times and frequency of use. The existing buffers, including the forested areas and topography will continue to provide sufficient separation between School and residential uses. The track and field is located at least 200 feet from the nearest residential property, while the soccer field and softball field are located approximately 45 feet from the closest residential property.

(7) *Will not, when evaluated in conjunction with existing and approved special exceptions in any neighboring one-family residential area, increase the number, intensity, or scope of special exception uses sufficiently to affect the area adversely or alter the predominantly residential nature of the area. Special exception uses that are consistent with the recommendations of a master plan do not alter the nature of an area.*

The Special Exception Modification does not propose an increase in the number or scope of special exception uses in the area. As discussed above, any change to the intensity of Special Exception uses at the Property will be fully contained and managed within the Property. The 1990 *Bethesda-Chevy Chase Master Plan* recognized Holton Arms School as one of the many private educational institutions in the area and reconfirmed the use and recommended it to remain.

(8) *Will not adversely affect the health, safety, security, morals, or general welfare of residents, visitors, or workers in the area at the subject site, irrespective of any adverse effects the use might have if established elsewhere in the zone.*

The proposed Major Modification will not adversely affect the health, safety, security, morals or general welfare of residents, visitors or workers in the area. The existing special exception has operated for many years without causing such adverse effects and the proposed increase in enrollment has been studied with the Transportation Impact Study and found that the existing road network can accommodate the increase. Further, the Applicant will be constructing improvements at the intersection of River Road and Royal Dominion Drive, the main access point for the School, to mitigate the number of increased trips on the road network. The School will be secure, and has an existing gate at the entrance from River Road and the School also has private security to ensure safety of students on Campus.

(9) *Will be served by adequate public services and facilities, including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage, and other public facilities.*

The Major Modification will continue to be served by adequate public facilities. The Property is served by public water and sewer mains which are sufficient for the increased enrollment, and is classified in the W-1 and S-1 categories. Dry utilities including electricity, gas, and telephone are also available to the Property and will continue to be adequate. Other utilities, public facilities and services, such as telecommunications, police stations, firehouses and health services are currently operating within the standards set by the 2020-2024 Growth and Infrastructure Policy.

(A) *If the special exception use requires approval of a preliminary plan of subdivision, the Planning Board must determine the adequacy of public facilities in its subdivision review. In that case, approval of a preliminary plan of subdivision must be a condition of granting the special exception.*

(B) *If the special exception:*

- (i) *does not require approval of a new preliminary plan of subdivision; and***

- (ii) ***the determination of adequate public facilities for the site is not currently valid for an impact that is the same as or greater than the special exception's impact, then the Board of Appeals or the Hearing Examiner must determine the adequacy of public facilities when it considers the special exception application. The Board of Appeals or the Hearing Examiner must consider whether the available public facilities and services will be adequate to serve the proposed development under the Growth Policy standards in effect when the application was submitted.***

The prior Preliminary Plan No. 119871710 approved in 1987, limited student enrollment to 630 students. It is a condition of this Major Modification that the Preliminary Plan be amended to modify that student cap condition and adopt the adequate public facilities review and approval of the Special Exception case as it may be amended.

This Application was submitted in 2024⁴ and is subject to the 2020-2024 Growth and Infrastructure Policy (GIP) and 2023 Local Area Transportation Review (LATR) Guidelines. Since the proposed increased enrollment will result in greater than 50 net new weekday peak-hour person-trip (as shown in Table 2), a full LATR study was conducted. This study consisted of motor vehicle, pedestrian, bicycle, and transit system adequacy.

Table 1: Existing Trip Generation for Holton Arms School

Line #	Condition	Enrollment	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
1	School year enrollment	670 students	537	331	868	161	311	472
2	Existing School Year trip generation rate per student based on January 2024 counts	670 students	0.80	0.50	1.30	0.24	0.46	0.70
3	Summer Enrollment (Approved)	665 campers	430	340	770	281	333	614
4	Existing Summer trip generation rate per camper based on Summer 2024 counts	665 campers	0.65	0.51	1.16	0.42	0.50	0.92

⁴ An Application was submitted to the Board of Appeals on December 13, 2024. In a Worksession dated December 18, 2024, the Board of Appeals voted to refer this major modification request to the Office of Zoning and Administrative Hearings for a public hearing. See Attachment F.

Table 2: Proposed Trip Generation¹ for CBA-1174-E with Trip Reducing TDM mitigation

Line #	Condition	Enrollment	AM Peak Hour In	AM Peak Hour Out	AM Peak Hour Total	PM Peak Hour In	PM Peak Hour Out	PM Peak Hour Total
5	Proposed School year enrollment with TDM	870 students	618	400	1018	196	357	553
6	Proposed trip generation rate per student based on trip generation model with TDM	870 students	0.71	0.46	1.17	0.23	0.41	0.64
7	Net School year trips (proposed school year trips – existing school year trips)	970 campers	81	69	150	35	46	81
8	Proposed Summer enrollment with TDM	970 campers	546	459	1005	350	454	804
9	Proposed trip generation rate per camper based on trip generation model with TDM	970 campers	0.56	0.48	1.04	0.36	0.47	0.83
10	Net Summer Trips (proposed summer trips – existing summer trips)	970 campers	n/a	n/a	n/a	69	121	190

¹The methodology for the proposed school year and summer trip generation was developed using existing travel patterns, driveway counts, mode split data, carpooling rates, and proposed modifications to both the school year and summer camp operations. Arrival and departure trip distributions were developed for the different trip categories based on travel demand profiles for student/families, staff/faculty, and the school's daycare program. Trip distributions and methodology were then validated through an iterative analysis using the collected traffic counts analysis.

The pedestrian adequacy review found that improvements would need to be made to provide an adequate pedestrian environment in the study area which was a 900-foot walkshed beyond the site frontage. The noted deficiencies included sections with missing or narrow sidewalks, missing or narrow buffers, missing crosswalks, and curb ramp deficiencies.

The bicycle adequacy review consisted of a study area of 900 feet beyond the site frontage. This review identified that there is currently a non-continuous bike lane along a portion of River Road; this does not provide an adequate bicycle facility since there is no separation from the vehicular traffic, and this is a high-volume roadway.

Within the 1,300-foot transit adequacy study area, seven (7) bus stops were identified. There is (1) one bus stop along the Site frontage for the Metrobus T2 line. One of the (7) seven bus stops currently has a shelter, and none have real-time displays. As part of their frontage improvements, the School will be installing a bus shelter at the stop

along their frontage. While the LATR study identified deficiencies, the School will not be adding square footage therefore the proportionality guide amount is \$0, and no further offsite improvements are required.

For the motor vehicle adequacy, (7) seven intersections were analyzed. Six (6) out of these seven (7) are located consecutively along the River Road corridor, so the corridor as a whole was analyzed. The Site is located in the Bethesda/Chevy Chase Policy Area, and per the LATR guidelines, the Highway Capacity Manual (HCM) standards apply. The HCM average vehicle delay standard for this policy area is 80 seconds/vehicle. Both the River Road corridor and the isolated intersection (Burdette Road and Arrowood Road) operate within the congestion standards under all study scenarios. Even though the motor vehicle adequacy test shows that the intersections are within the standards and thus do not trigger intersection capacity improvements per the 2023 LATR guidelines, additional queuing studies were requested by MDOT-SHA. This analysis showed queueing exceeding available storage lengths in existing conditions and in future scenarios. To better distribute queueing along the River Road corridor, the following mitigation measures have been identified:

- TDM measures to reduce school-generated trips, as discussed in the Access and Circulation section Signal timing adjustments
- Extension of the westbound right turn lane on River Road from 210 ft to 500 ft
- Addition of a northbound left turn lane at Royal Dominion Drive and River Road

Staff recommends these improvements are installed before enrollment can increase. With these improvements, and the proposed Transportation Management Plan, there will be adequate public facilities to serve the increased enrollments proposed by the Application, based on the 2020-2024 Growth and Infrastructure Policy that was in effect when the Application was submitted.

There is an existing Preliminary Plan that was approved for the Property in 1987 (Preliminary Plan No. 119871710), which includes a condition limiting enrollment to 630 students. Special Exception Case No. CBA-1174 was modified after the approval of this Preliminary Plan to allow an increase in enrollment beyond 630 students, first in 1994 and then in 2004. In both cases, the Board of Appeals made the determination that adequate public facilities existed for the increased

enrollment based on the Growth and Infrastructure policy in effect at that time. Staff recommends a condition requiring the Applicant to modify the Preliminary Plan to modify the condition limiting enrollment, to continue to allow the determination of adequate public facilities for the Site to be made with the Special Exception Case No. CBA-1174. As conditioned, this Preliminary Plan Amendment will be submitted subsequent to the Hearing Examiner's consideration of Special Exception Case No. CBA-1174-E and may rely on the findings made herein regarding the determination of adequate public facilities.

(C) With regard to public roads, the Board or the Hearing Examiner must further find that the proposed development will not reduce the safety of vehicular or pedestrian traffic.

The proposed increased enrollment will not reduce the safety of vehicular or pedestrian traffic. As stated in the previous finding, the congestion standards are met and appropriate mitigations are being proposed to improve the existing problems at the intersection of River Road and Royal Dominion Drive. In addition to these mitigations, the Applicant will also be installing a bus shelter at an existing bus stop along the River Road frontage to enhance non-automobile access to the school and surrounding community.

SECTION 7: CONCLUSION

The proposed Special Exception Major Modification complies with the findings required for approval of a private educational institution, subject to the recommended conditions of approval. The proposed use is consistent with the goals and recommendations of the 1990 *Bethesda-Chevy Chase Master Plan*, will not alter the residential character of the surrounding neighborhood, and will not result in any unacceptable noise, traffic, or environmental impacts on surrounding properties. Staff recommends approval of the Special Exception Major Modification with conditions and transmittal of comments to the Hearing Examiner.

ATTACHMENTS

Attachment A: Approved Forest Conservation Plan No. CBA-1174-D

Attachment B: Applicant's Transportation Management Plan

Attachment C: Correspondence

Attachment D: Record Plat

Attachment E: Applicant's Statement of Justification

Attachment F: Board of Appeals Petition of the Holton Arms School for Case No. CBA-1174-E

Attachment G: Previous Approvals

Attachment H: Agency Approval letters