

December 16, 2025

Re: Wilgus II Preliminary Plan 12020041A, and Site Plan 820250100

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

Thank you for the opportunity to comment on Wilgus II.

In your decision please encourage the Montgomery County Department of Transportation to bury the overhead utilities along the Towne Road and Montrose Road frontages using funds from the White Flint Special Taxing District. To reduce the cost, MCDOT could consider a partial undergrounding - only the feeder lines (primary), leaving the poles, telecom and secondary electric lines intact.

The Wilgus II tract has a frontage of approximately 500 feet along Montrose Road and 300 feet along Towne Road. Overhead utilities along both frontages include Pepco feeder lines (13,000 volt primary), Pepco secondary lines (120/240 volt) as well as Verizon/Comcast telecom lines. There are existing MCDOT-owned, pedestrian-scale, underground fed LED street light fixtures along the Towne Road frontage and part of the Montrose Road frontage.

Full or partial undergrounding along these frontages would benefit electric reliability for many nearby properties. According to Pepco's online Distribution Feeder Hosting Capacity map, Feeder #15214 runs along the Montrose Road frontage. It serves Montrose Road (JCC, Hebrew Home), E. Jefferson St, Josiah Henson Pkwy, Executive Blvd. Pepco feeders #14940 and #14937 (currently out of Parklawn substation, load soon to be transferred to new White Flint substation on Nebel/Marinelli) run along the Towne Road frontage. Feeder #14940 serves properties on Towne Rd, Montrose Rd, Randolph, Chapman including Rose Village and the proposed new White Flint fire station. Feeder #14937 serves properties on Randolph, Nebel, Chapman (shopping center north of Randolph), Old Georgetown (rear) east of 355, Rockville Pike (Cava shopping center), Towne Rd, Old Georgetown (east of Towne, already partly buried),

Executive Blvd, Nicholson (east of Old Georgetown), and Old Georgetown south of Executive Blvd.

The overhead utilities along Towne Road are nearly identical to the overhead utilities that the planning board required the applicant to bury in the sketch plan approval for 4861 Battery Lane in Bethesda.

Towne Road is classified as a Downtown Boulevard - for which the Complete Streets Design Guide requires Undergrounding of Utilities (Master Plan recommendations supersede this guidance).

The Solera/Modena Reserve senior living on Metropolitan Ave in Kensington is an example in which the planning board required undergrounding even though the sector plan was silent on the topic.

My estimate of the cost to fully bury the overhead utilities along both Wilgus II frontages is \$1.5 million. This is based on MCDOT's \$1.2 million cost to bury 800 feet of Pepco's 69,000 volt overhead substation supply lines on nearby Old Georgetown Road west of 355. That project was completed in 2024. Another cost benchmark is the full undergrounding of 700 feet of frontage on Chevy Chase Lake Drive which cost \$1.3 million in 2016.

A less costly option would be partial undergrounding as is commonly implemented on Pepco lines in the District of Columbia. Partial undergrounding involves burying only the 13,000 volt Pepco feeder lines at the tops of the poles. All of the other infrastructure remains, including the wood poles, the Pepco secondary lines and the Verizon/Comcast telecom lines. This results in all of the reliability and tree canopy benefits of undergrounding but at a much lower cost. None of the other overhead lines conflict with the tree canopy or affect reliability.

The Wilgus II property lies within the White Flint Special Taxing District.

The planning board should recommend full or partial undergrounding along both frontages on the condition that it be funded by the White Flint

Carr comments on Preliminary Plan 12020041A and Site Plan 820250100

Special Taxing District to which the Wilgus II property contributes. Partial undergrounding is a cost effective option that would improve reliability and would facilitate the planting of large overstory trees in the public rights of way. This partially mitigates the substantial loss of forest for Wilgus & Wilgus II. Funding through the Special Taxing District would avoid the potential for the applicant double paying for undergrounding.

In the absence of guidance from a utility functional plan, this would be a sensible decision.

The benefits of undergrounding are many - besides aesthetics, undergrounding improves electric reliability for entire neighborhoods. And by allowing the planting and growth of large canopy trees, it improves water quality and creates cooler, more pedestrian-friendly neighborhoods.

I would also like to express my concern about the lack of transparency in the development review process.

The weeks-long lag time between when documents are received by planning and when they are posted to DAIC and available to the public makes the development review process opaque.

Many of the documents are dated 10/14/25 on the DAIC website but were only uploaded to DAIC on 11/5/25.

There should be a way for interested members of the public trying to follow along and comment meaningfully to receive such documents in real time.

Al Carr  
3904 Washington St  
Kensington, MD 20895

**From:** [Bossi, Adam](#)  
**To:** [MCP-Chair](#)  
**Subject:** FW: Wilgus II Northpark  
**Date:** Wednesday, December 17, 2025 6:03:28 AM  
**Attachments:** [image.png](#)  
[image.png](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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See below for public comment received Tuesday evening for Item 8 on Thursday's Planning Board agenda. Thank you.



**Adam Bossi**  
Planner III, West County Planning Division  
Montgomery County Planning Department  
2425 Reddie Drive, Wheaton, MD 20902  
[adam.bossi@montgomeryplanning.org](mailto:adam.bossi@montgomeryplanning.org)  
o: 301 495 4529

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**From:** Benjamin Carlson [REDACTED]  
**Sent:** Tuesday, December 16, 2025 6:40 PM  
**To:** Bossi, Adam <[Adam.Bossi@montgomeryplanning.org](mailto:Adam.Bossi@montgomeryplanning.org)>  
**Subject:** Wilgus II Northpark

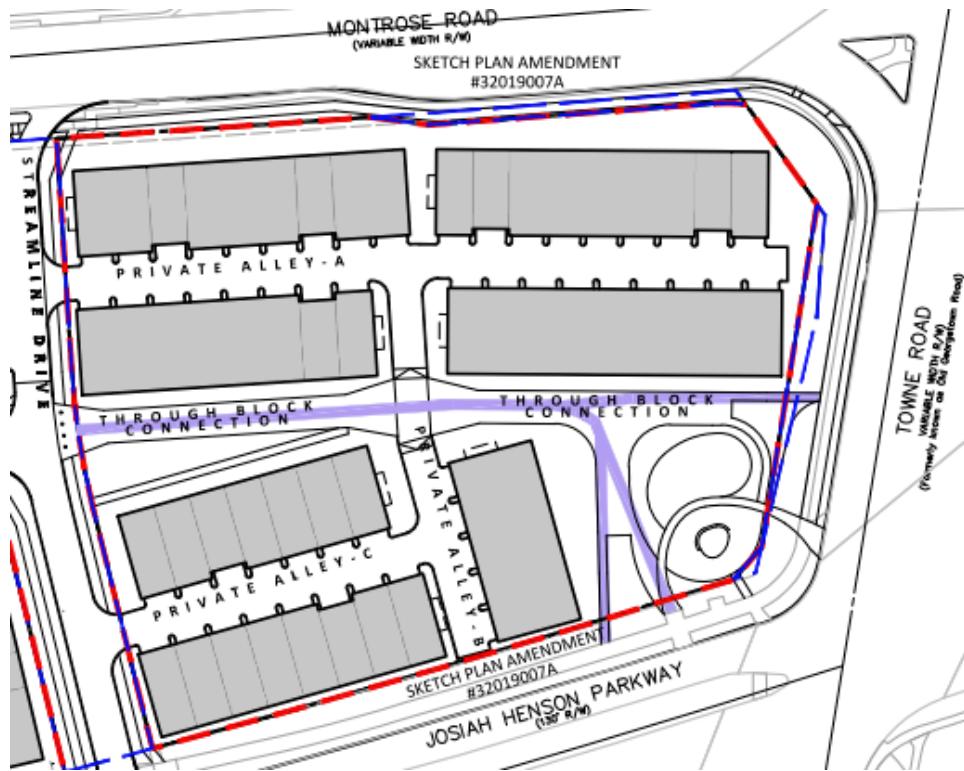
**[EXTERNAL EMAIL]** Exercise caution when opening attachments, clicking links, or responding.

Good Evening Adam,

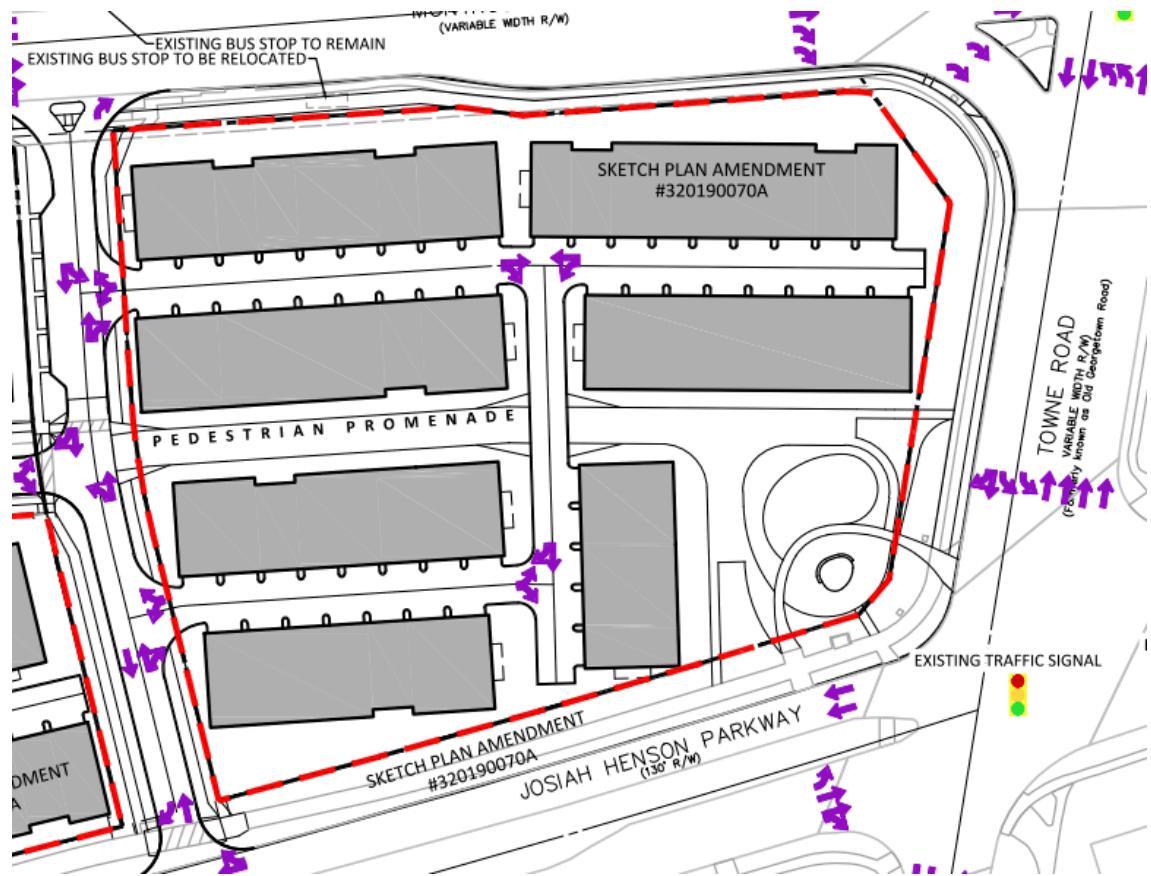
My name is Ben Carlson, I'm a resident of North Park. I would like to comment on the development plan proposed for Wilgus II Northpark.

I'm supportive of the plan, but I do have two small comments on the plan I hope can be considered by both the Planning Board and the Developer.

First, it would be great if the pedestrian and bicycle connectivity Private Alley B and the Mix Use Path alongside the Josiah Henson Parkway could be improved. A simple access sidewalk or access path could allow residents who are bicyclists and pedestrian access to the mixed use path.



Second, the bus stop along Montrose Road is noted to be "relocated" but the plan dose not indicate where it will be relocated to. It appears from the map below that the developer plans to simply remove the stop entirely. As a transit rider, I don't object to the stop being relocated, but would be a inconvenience to public transit riders like myself if the stop was out right eliminated.



I appreciate your consideration,

Ben Carlson