

**Bethesda Downtown Plan**  
**Written Comments**  
**November 1, 2016**



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Honorable Members of the Montgomery County Council:

Thank you for the opportunity to provide written comments regarding the proposed Bethesda Downtown Plan. The Coalition of Bethesda Area Residents (CBAR) is a grassroots organization supported by residents and community leaders who live in, adjacent to, and near the Bethesda Downtown Plan area. All of us will feel the impacts of the final Plan.

This submission provides input on how to bring four troubling components of the Plan into balance: Parks, Schools, Transportation and Compatibility with Edge Communities. We also discuss the community's strong desire to incorporate an "Infill Staging Policy" in the Plan to address deep concerns about the impacts of ambitious growth during its short 20-year time period.

We submit as part of our testimony a white paper prepared by Town of Chevy Chase resident, John Freedman. It exposes problems in how the Planning Board concluded that traffic, schools, and other infrastructure capacity is adequate for the proposed development. It is because of these problems and other issues of great concern that we respectfully submit the following comments that expand upon the CBAR testimony delivered at the Public Hearing on October 18, 2016.

## **INTRODUCTION**

The CBAR community does not oppose development. We understand that density, when supported by adequate public facilities and a strong sense of place, can provide environmental

and economic advantages. Our objection is that Bethesda does not adequately support the current population with adequate public schools, parks, or transportation infrastructure, and the Bethesda Downtown Plan makes no effort to improve them to support the proposed population.

We come to this conclusion after observing and participating in the 17 Planning Board worksessions, and through a long and disciplined analysis of the data. Based on that analysis, we see the Plan calling for a 91% increase in households, an 89% increase in population, and a 135% increase in employees:

	2015 <sup>1</sup>	2040 <sup>1</sup>	20 Year Plan Projections	Plan Projections Above MW-COG
Households	9,207	12,545 +3,338   +36%	17,663 +8,456   91%	+5,118 +41%
Population	18,127	25,060 +6,933   +38%	34,187 +16,060   +89%	+9,127 +36%
Employees	38,411	49,540 +11,129   +29%	90,311 +51,900   +135%	+40,711 +82%

Considering that (a) the entire County suffers chronic overcrowding in the schools, (b) the Wisconsin corridor and many of its cross-streets are gridlocked and an overhauled Metro maxes out at 43,000 to 45,000 passengers an hour, and (c) the only undeveloped land that could be used for parks are the County's surface parking lots, it is entirely reasonable to question how current infrastructure will support the level of growth proposed in this Plan.

Our recommendations are few, respect the premise that redevelopment should occur, and are overarching in nature. We anticipate that County officials and staff will work with each other and our communities to determine how to implement each recommendation.

**SCHOOLS**

You have heard extensive testimony from parents concerning the quality of our children's public educational experience. Overcrowding is now a County-wide, chronic problem that must be addressed holistically and independently of the Bethesda Downtown Plan.

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<sup>1</sup> Source: Metropolitan Washington Council of Governments, Round 8.4

In the context of this Plan, residents are deeply troubled that both Bethesda Elementary and B-CC High School are overcrowded and lack any room for expansion. The remediation options listed in section 2.8.4 are vague, some have been discounted in the past as unfeasible, and in some cases the same remediation options have been proposed to other MCPS clusters. Unlike other areas of the County, there's no land left for building new schools.

Most troubling is the preference in the July 2016 Planning Board draft for outdated information. Planning Department staff explained to CBAR that MCPS wrote section 2.8.4: Educational Facilities, for the May 2015 Staff Draft. Michael Durso, president of the Board of Education, updated the official guidance in a March 24, 2016 letter addressed to Planning Board Chair Casey Anderson and County Council President Nancy Floreen. This official letter also raised concern that the combined effect of the Bethesda Downtown, Westbard, and Lyttonsville plans were "coming at a time when many of the schools in the area either currently exceed capacity or are projected to exceed capacity in the near future." (Note that missing from this letter is the additional enrollment B-CC High School will experience as a result of the Chevy Chase Lake sector plan.)

It is deeply troubling that the July 2016 Planning Board draft retained outdated information. Section 2.8.4 is clearly invalid, and must be revised prior to approving the Plan.

Therefore, CBAR communities request that County Council staff collaborate with the Board of Education staff (MCPS) to:

- Provide realistic student generation numbers for the proposed housing units (currently in section 2.8.4, pages 92-94)
- Include feasibility and capacity assessments for each remediation option offered in the Plan
- Identify sites in the Plan that are suitable for new school construction (Figure 2.24, Community Facilities, page 89)

## **TRANSPORTATION**

Another area of concern for many residents is traffic. After careful analysis, we have come to the unfortunate conclusion that the draft Plan used transportation test and analysis methods that are flawed, and resulted in conclusions that do not represent our day-to-day experience.

Attached to these comments is a white paper authored by John Freedman, a private citizen who lives in the Town of Chevy Chase, that thoroughly sets out the inconsistencies and errors. We urge you to review it carefully and recognize that the inadequacies exposed in the paper are embedded in the Plan's traffic analysis.

To remedy the resulting bias in the Plan towards transportation adequacy, CBAR communities request a new transportation study from an expert third party, such as the National Transportation Center at the University of Maryland. To assuage residents' concerns about the validity of a revised traffic study, we recommend that the data, assumptions and commentary be published with a revised Plan.

## **PARKS**

Public amenities, and parks in particular, attract employers, employees, residents and visitors to an area. They are "place makers." As Bethesda buildings start reaching for the sky, the County must foster a strong sense of place on the ground through its public amenities requirements. Parks are the foundation for that work.

Unfortunately, the promotion of parks as the number one priority in the Plan leaves residents disillusioned, as the proposals do not match the vision. CBAR added up every fraction of an acre of proposed park and open space in the Plan (see the appendices), and applied two standard metrics to assess adequacy:

Total proposed Parkland acreage at full build-out Source: Appendix B	18.49 acres
Parkland area as a percentage of total acres Calculation = $18.49 / 457$ acres in total Plan area	4%
Acres per 1000 people Calculation = $18.49 / 34.2$	0.54

As a priority, the parks proposal fails. At full build-out:

- Park land as a percentage of total Plan area acreage tops out at a mere 4%
- Acres per 1000 people is a dismal 0.54. For comparison, Washington DC provides 13.2 acres per 1000 people.

Also note that we are disappointed with the lack of implementation planning. On June 28, CBAR wrote in support of the Parks Impact Payment and Open Space Sending Site proposals (<http://cbar.info/cbar-comments-on-pip-and-open-space-pss-proposals/>). While many residents and communities support a specific dollar amount, CBAR never did. Instead, our support was focused exclusively on the logic of the pricing methodology proposed by the Planning Department:

Calculation:

*Moderate Cost Estimate \* Proportional Developer Funding*

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*Available BOZ Density*

A pricing methodology is a necessary component in implementation planning. Disappointingly, the pricing methodology was never discussed in the Planning Board Worksessions. Instead, commissioners tossed about arbitrary numbers until they settled on \$10 per square foot, and with that, the Board completed deliberations and approved the July 2016 Board Draft Plan 5-0. CBAR believes we need more substance in the Plan to assure residents that the small number of proposed greenways, pocket parks and plazas will be built.

We also strongly believe that larger recreational parks and community event spaces must be added to the Plan, and County-owned parking lots and the open space owned by WMATA are the places to develop them. These lots are economically attractive (to taxpayers) because (a) they are already owned by the public, and (b) as the last undeveloped spaces, the public saves in deconstruction expenses.

On the parks issue, what we witnessed at the Planning Board was not planning. We witnessed politics, and perhaps fatigue. We ask that you revise the Plan to include guidance on how and

when public parks will be funded, built and managed. Bethesda cannot afford *not* to have more recreational spaces or a parks implementation plan.

### **COMPATIBILITY WITH EDGE COMMUNITIES**

We applaud the greenway concept as a way to transition between the built-up centers of activity and residential neighborhoods. However, as currently proposed, it's an unfair barter that brings with it excessive traffic and noise from commercial up-zoning, and imposes unacceptable heights that diminish the sense of neighborhood. We believe that the County's economic objectives can be achieved without encroaching on edge communities. There are over a hundred "non-edge" properties with appropriate zoning capacity to build out the Plan.

Therefore, we request that a revised Plan include a new framework, specifically a Compatibility Plan, that explicitly:

- Ensures that new development is compatible in use and scale with neighboring residences.
- Transitions heights and densities down even more from the centers of activity into neighborhoods.
- Guarantees a greenway that provides a truly functional transition space that is (a) sheltered from traffic and (b) connects neighborhoods to each other and with the centers of activity.

We stand with each other in our support for these common requests, and support each community's requests to avoid or remediate potentially negative effects within and along each community's borders.

### **INFILL STAGING POLICY**

Because residents have justifiable concerns about the impacts of development on public schools, transportation infrastructure and park space, CBAR urges the Council to modify the Plan to include explicit stages of review before development may proceed to the full 32.4 million square feet of proposed development. As we and our children experience classroom overcrowding, gridlock and transit failures, and scarcity of recreational space, it's clear that we need to stage new development to coincide with infrastructure improvements.

Staging is not a new concept to the County and has been incorporated into prior plans such as Great Seneca, White Flint and Chevy Chase Lake. We recognize that establishing appropriate measures or triggers for a "Bethesda downtown infill staging policy" will be challenging, but we are convinced that it is necessary and the right thing to do. We are confident that County officials and staff can work with each other and our communities to determine how to proceed.

## CONCLUSION

Before the Plan goes to the Council for a final vote, CBAR, with support from Bethesda communities, requests revisions that:

1. Update student generation rates from the **Board of Education** (MCPS), include feasibility and capacity assessments for each remediation option offered in the Plan, and identify sites that are suitable for new school construction.
2. Designate county-owned parking lots and open space owned by WMATA as **recreational parks and community event spaces**, and include guidance on how and when public parks will be funded, built, and managed.
3. Validate **transportation** adequacy with a new study from an expert third party.
4. Incorporate greenways into a **new compatibility plan** that limits height, density and allowable uses along the **edges**.
5. Incorporate a **Bethesda downtown infill staging policy** that requires infrastructure improvements to support proposed redevelopment.

The public is looking to you individually and as a governing body for your leadership. Please demonstrate your commitment to serve the tens of thousands of current and future Bethesda area residents by strengthening the Plan with respect to parks, schools, transportation, and compatibility with edge communities.

Thank you for your consideration.

Mary Flynn  
Founder, CBAR

## Appendix A: Area Data

The Bethesda downtown area is defined by three Transportation Area Zones (TAZ). Figure 1 shows the physical boundaries of these areas, and includes Households, Population, and Employment statistics broken down by TAZ and the years 2010, 2015 and 2040. By addition, we obtain two key data points:

- Total Plan population for 2015: **18,127**
- Total Plan area: **457 acres**

By dividing Population by Households and averaging those numbers over the selected years we obtain:

- Average Household size: **1.96**

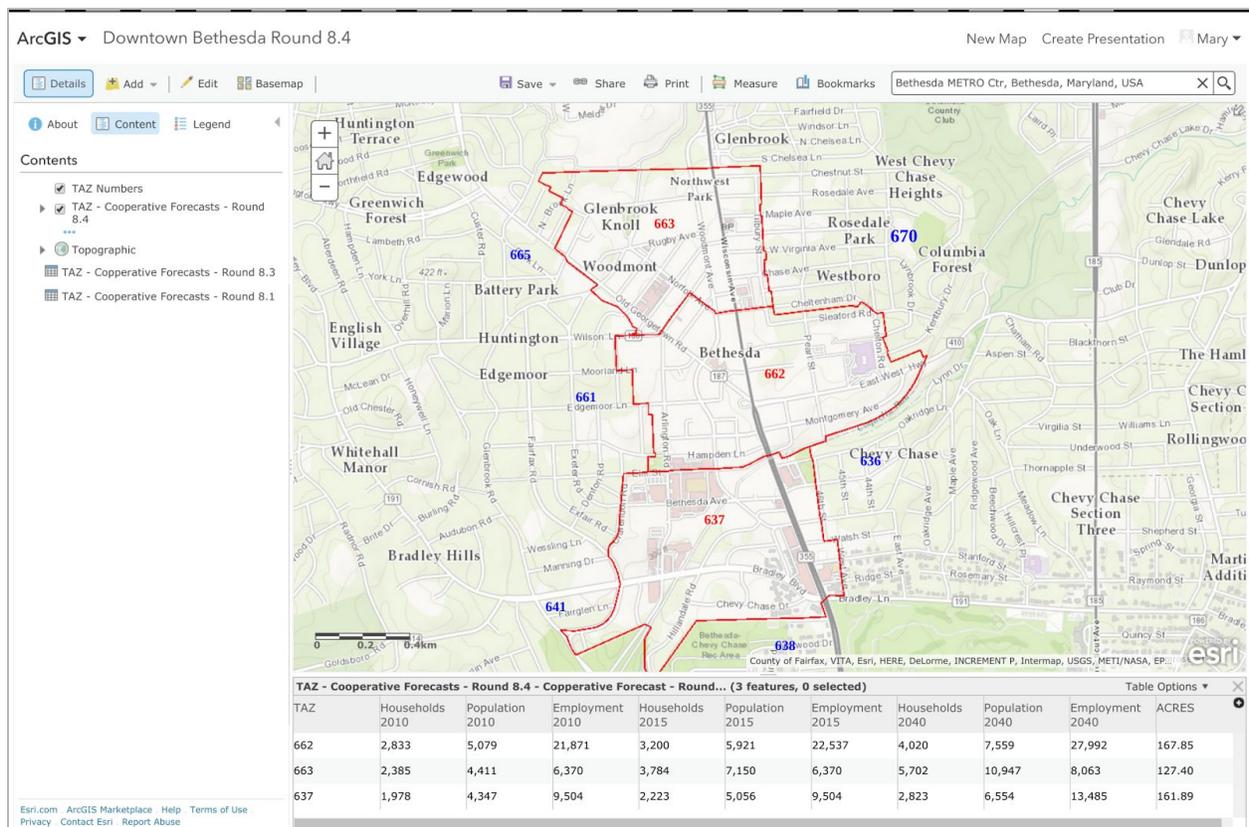


Figure 1: The Metropolitan Washington Council of Governments Round 8.4 Households, Population, and Employment numbers for the downtown Bethesda area broken down by TAZ and years 2010, 2015 and 2040.

The proposed number of new households is documented throughout the Plan to be **8,456**. The additional proposed population is calculated to be 16,574, as shown in the table below. On September 22, Leslye Howerton provided the Board-approved number of 16,060. Considering they are close, we use the lower Planning Board number of **16,060** in our calculations.

Projected number of new households	8,456
Average household size Source: Metropolitan Washington Council of Governments, Forecast Round 8.4, average for years 2010, 2015 and 2040	1.96
Additional proposed population (calculated)	16,574
Additional proposed population (approved by Planning Board)	16,060

And finally, the total population proposed in the Bethesda Downtown Plan is 34,187, an 89% increase over the 2015 population.

2015 population Source: Metropolitan Washington Council of Governments, Forecast Round 8.4	18,127
Additional proposed population	16,060
Total population proposed in the Bethesda Downtown Plan Percent increase between 2015 - 2040	34,187 89%
Residential population density	75 / acre

**Appendix B: Portfolio of Parks within the Bethesda Downtown Plan area**

#	Page	Title	ACRES		
			2015	Additional Proposed	Total Proposed
1	83	1 Veterans Park Civic Green		0.50	0.50
2	83	2 Farm Women's Market Civic Green	0.60	0.00	0.60
3	83	3 Capital Crescent Civic Green		0.50	0.50
4	84	1 North Bethesda Trail Urban Gateway		0.90	0.90
5	84	2 Gateway into Norwood Park			0.00
6	85	3 Eastern Capital Crescent Urban Greenway		1.89	1.89
7	85	4 Arlington South Gateway Plaza			0.00
8	85	1 Fire Station 6 Urban Buffer Park		0.85	0.85
9	85	1 Old Georgetown Road Neighborhood Green		0.30	0.30
10	86	2 Wellington Drive Neighborhood Green		0.50	0.50
11	86	3 South Bethesda Public Plaza		0.15	0.15
12	86	4 Bethesda-Chevy Chase East Neighborhood Green		0.30	0.30
13	86	5a Eastern Greenway Neighborhood Green #1		0.50	0.50
14	86	5a Eastern Greenway Neighborhood Green #2		0.50	0.50
15	86	5b Eastern Greenway Neighborhood Green #1		1.00	1.00
16	86	5b Eastern Greenway Neighborhood Green #2		1.00	1.00
17	86	5b Eastern Greenway Neighborhood Green #3		1.00	1.00
18	86	6 Western Edge at Bethesda Elementary School		1.00	1.00
19	86	6 Caroline Freedland Neighborhood Park	1.00	0.15	1.15
20	87	1 Battery Lane Neighborhood Park	2.00	0.65	2.65
21	87	2 Chase Avenue Neighborhood Park	0.40	0.40	0.80
22	n/a	Cheltenham Drive Urban Park	0.3	0.00	0.3
23	87	3 Elm Street Neighborhood Park	2.10	0.00	2.10
		Totals	6.10	12.09	18.49

**Appendix C: Portfolio of Parks within a ¼ mile walk from the Bethesda Metro Center**

Expanding the analysis to include parks in edge communities (Lynbrook, Leland, and Norwood) actually *decreases* park land as a percentage of total acres to 2.4%, and only nominally increases acres per 1000 people to 0.97.

Total proposed Parkland acreage at full build-out (in acres), including neighborhood parks	45
Parkland area as a percentage of total acres Calculation = 45 / 1,873 area	2.4%
Acres per 1000 people Calculation = 45 / 46.5	0.97

#	Page	Title	ACRES		
			2015	Additional Proposed	Total Proposed
		TOTALS FROM APPENDIX B	6.10	12.09	18.49
24	n/a	Capital Crescent Trail from Wisconsin - Connecticut (to be deforested to be used for transit and bicycle commuter routes)	4.50	-4.50	0.00
25	n/a	Leland Neighborhood Park	3.70		3.70
26	n/a	Norwood Park	17.00		17.00
27	n/a	Lynbrook	5.80		5.80
		Total acres of park land	37.10		44.99

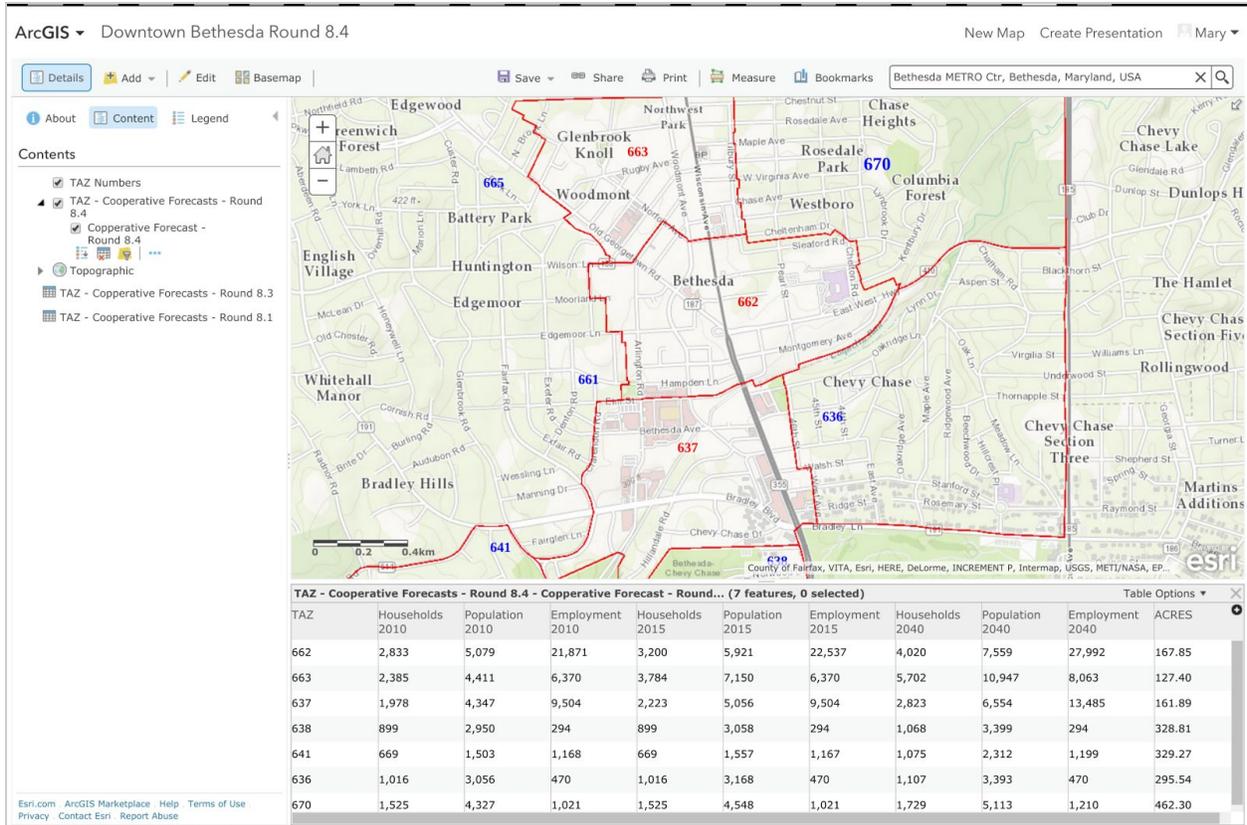


Figure 2: The Metropolitan Washington Council of Governments Round 8.4 Households, Population, and Employment numbers for the downtown Bethesda area and surrounding neighborhoods with public parks, broken down by TAZ and years 2010, 2015 and 2040.

Acres in Plan + neighborhoods with public parks	1,873
Leland Park is in TAZ 636 Lynbrook Park is in TAZ 670 Norwood Park is in TAZ 638 and 641	

Population in Plan area + neighborhoods with public parks	Totals
2015 (MW-COG Round 8.4)	30,458
Projected (+ 16,060 in Plan)	46,518

## APPENDIX D: Metro 7000 Series, 8-Car Train Capacity Per Hour

The new<sup>2</sup> 7000 series, 8-car trains consist of two types of cars (A and B) and are configured as follows: A - B - B - A - A - B - B - A. The 7000 series train therefore has (4) A-cars and (4) B-cars. A-cars have a lesser passenger capacity than B-cars, as shown in the table below.

	Car Type	
	A	B
Number of cars per train	4	4
Transverse seating configuration <ul style="list-style-type: none"> <li>• Seating capacity</li> <li>• Maximum capacity (standing)</li> </ul>	64 175	68 184
Longitudinal seating configuration <ul style="list-style-type: none"> <li>• Seating capacity</li> <li>• Maximum capacity (standing)</li> </ul>	58 184	64 192

The above table also demonstrates that passenger capacity is determined by seat configuration. Transverse seating allows more people to sit, but fewer people to stand. Longitudinal seating is the opposite, and because people standing consume less space than people sitting, this seating configuration offers greater passenger capacity.

The maximum standing capacity for an 8-car train is therefore in the range of 1,436 - 1,504 people per train:

Transverse seating configuration Maximum capacity (standing)	$(4 * 175) + (4 * 184) = 1,436$ people
Longitudinal seating configuration Maximum capacity (standing)	$(4 * 184) + (4 * 192) = 1,504$ people

The maximum frequency trains can run is every 2 minutes, or 30 trains per hour. Therefore, the maximum number of passengers that the Bethesda Metro station can serve is in the range of 43,080 - 45,120 per hour.

<sup>2</sup> Source: Washington Metro Rolling Stock  
[https://en.wikipedia.org/wiki/Washington\\_Metro\\_rolling\\_stock#7000-series](https://en.wikipedia.org/wiki/Washington_Metro_rolling_stock#7000-series) retrieved Oct 27 2016.