

**WHITE PAPER ON THE JULY 2016 DRAFT  
BETHESDA DOWNTOWN SECTOR PLAN:  
IS THE PLAN “IN BALANCE” AND DOES  
IT PROVIDE ADEQUATE PUBLIC FACILITIES?**

Submitted by:

The Coalition of Bethesda Area Residents (“CBAR”)  
November 1, 2016

## **Overview**

The final draft version of the Bethesda Downtown Plan (the “Plan”) approved by the Planning Board on July 21, 2016 provides for an increase of 8.8 million square feet of development -- 37 percent beyond the 23.6 million currently on the ground and 18 percent more than authorized under the 1994 Bethesda CBD Plan. Consistent with this level of development, the Plan assumes very substantial population growth in downtown Bethesda -- over the life of the Plan, the number of households and population are projected to double. In addition, the Plan projects more than 10,000 new jobs. If it is sustainable, significant population and job growth in Bethesda is generally desirable from an economic and environmental perspective, and should help attract amenities that enhance the quality of life for area residents.

The Planning Board studied the impacts of the development proposed in the Plan on schools and traffic in Bethesda and concluded that schools may become over-crowded but this can be adequately addressed over time, and that roads can support the proposed level of growth. However, our review of these studies has identified a number of significant shortcomings in the Planning Board’s analysis of school utilization, and traffic congestion. Contrary to the Planning Board’s conclusion, our review of the studies leads us to conclude that development at the proposed levels may lead to severe traffic congestion and overcrowding of area schools.

## **Traffic Analysis**

### **County Findings:**

The County Planning Board concluded that all of the intersections in the Plan area can accommodate traffic associated with the proposed 32.4 million square feet of development without exceeding congestion standards and therefore that the Plan is “in balance.”

The Plan cites the following conclusions from the Planning Department’s traffic analysis:

- All intersections within the Plan area that were included in the traffic analysis would operate within the threshold that is applicable to “Metro Station Policy Areas.”
- The Bradley Lane-Wisconsin Avenue intersection is projected to be the most congested intersection in the Plan area.
- If Old Georgetown Road and Montgomery Avenue are converted from one-way to two-way streets, the Montgomery Lane-Wisconsin Avenue intersection “would approach, but remain, within the congestion standard.”
- Four intersections immediately outside the Plan area would exceed the Bethesda-Chevy Chase congestion standard: (i) East-West Highway at Connecticut, (ii) Bradley at Connecticut, (iii) Bradley at Huntington, and (iv) Cedar at Rockville Pike.

The traffic analysis assumes implementation of four major transportation infrastructure improvements in the region: completion of the Purple Line between Bethesda and New Carrollton, elimination of the WMATA turn-back at Grosvenor, addition of express tolls on I-270 from I-370 to Frederick, and HOV lanes on I-95 between the ICC and MD 198.

## **Our Review:**

We have reviewed the information about the traffic analysis provided in the Plan and information about it that we obtained through correspondence with the Planning Board's traffic analyst (specifically, the CLV counts and projections used for the analysis). In addition, we reviewed the analysis the Planning Board conducted in conjunction with the Bethesda Purple Line Station Minor Master Plan Amendment,<sup>1</sup> the Planning Board's biennial Mobility Assessment Reports<sup>2</sup> and the library of traffic count reports available on the Planning Board's website.<sup>3</sup> We have also compared elements of the traffic model used by the County with those of the model used by the University of Maryland and noted a number of shortcomings with the county model.

Our review led us to conclude that the traffic analysis conducted for the draft Plan is inadequate in several respects:

1. The analytic tools the Planning Board relied upon in performing the traffic analysis do not adequately consider (i) the cumulative impact of multiple development projects, (ii) regional impact, or (iii) the effect queuing has in highly congested areas in suppressing CLV counts. Given the importance of the Bethesda Downtown Plan, there are alternative models and tests the Planning Board could and should have considered before approving the Plan.

Even on its own terms, the Planning Board used (i) outdated or misreported CLV data in its model, and (ii) used questionable projections to estimate future traffic growth.

2. As detailed in Table 1 below, outdated or misreported CLV counts were used for half the intersections analyzed by the Planning Board. For seven of the fourteen intersections the Planning Board analyzed to reach its conclusion the Plan was "in balance," CLV counts were used that understate current traffic conditions. In addition, the Planning Board omitted three critical intersections from its analysis. More specifically:

- For three intersections (Bradley Lane-Wisconsin Avenue, Old Georgetown-Arlington Road, and Wisconsin Avenue-East-West Highway-Old Georgetown Road) older, lower CLV counts were used in the traffic model instead of more recent, higher counts.
- For four intersections (Wisconsin Avenue-Cedar Lane, Arlington Road-Bethesda Avenue, Connecticut-East-West Highway, Wisconsin Avenue-Jones Bridge Road), the CLV counts used in the traffic model are discrepant with those reported in the backup materials or in the Mobility Assessment Reports, and

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<sup>1</sup>[http://www.montgomeryplanning.org/community/bethesda\\_purple\\_line/documents/BPLSTransportationAppendix-Traffic.pdf](http://www.montgomeryplanning.org/community/bethesda_purple_line/documents/BPLSTransportationAppendix-Traffic.pdf)

<sup>2</sup>[http://www.montgomeryplanning.org/viewer.shtm#http://www.montgomeryplanning.org/transportation/documents/Mobility%20Assessment%20Report%202014%20-%20DRAFT%20\(4-9-2014\).pdf](http://www.montgomeryplanning.org/viewer.shtm#http://www.montgomeryplanning.org/transportation/documents/Mobility%20Assessment%20Report%202014%20-%20DRAFT%20(4-9-2014).pdf)

<sup>3</sup> <http://mcatlas.org/intersections/>

- Three intersections (Bradley Boulevard-Arlington Road, Wisconsin Avenue-Bethesda Avenue, and Old Georgetown Road-Woodmont Avenue) considered critical in the Purple Line Station Minor Master Plan Amendment traffic assessment were omitted from the Bethesda Downtown Plan traffic analysis.

**Table 1: Plan area intersections for which outdated or discrepant CLVs were used in the traffic analysis**

<b>Intersection</b>	<b>CLV count used<sup>4</sup></b>	<b>Source of CLV used</b>	<b>Type of error</b>	<b>More recent/correct CLV</b>	<b>Source of Correct CLV</b>
Bradley-Wisc am	1,333	2/15/11 count	More recent data	1,542	1/15/15 count <sup>5</sup>
Old Georgetown-Arlington pm	1,323	1/18/12 count	More recent data	1,406	11/6/13 count <sup>6</sup>
Wisconsin-Cedar am	1,623	11/6/13 count	Discrepant	1,957	11/6/13 count <sup>7</sup>
Wisconsin-Cedar pm	1,590	11/6/13 count	Discrepant	1,612	11/6/13 count
Wisconsin-East-West-Old Georgetown am	1,060	11/6/13 count	More recent data	1,237	Purple Line <sup>8</sup> MMP
Wisconsin-East-West-Old Georgetown pm	1,093	11/6/13 count	More recent data	1,321	Purple Line MMP
Arlington-Bethesda am	884	12/14/10 count	Discrepant	901	12/14/10 count <sup>9</sup>
Arlington-Bethesda pm	1,055	12/14/10 count	Discrepant	1,161	12/14/10 count

<sup>4</sup> Source: Bethesda\_CLV.xlsx provided by Planning Department on July 19, 2016.

<sup>5</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=243&CountId=9297](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=243&CountId=9297)

<sup>6</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=253&CountId=8189](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=253&CountId=8189)

<sup>7</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=231&CountId=8177](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=231&CountId=8177)

<sup>8</sup> [http://www.montgomeryplanning.org/community/bethesda\\_purple\\_line/documents/BPLSTransportationAppendix-Traffic.pdf](http://www.montgomeryplanning.org/community/bethesda_purple_line/documents/BPLSTransportationAppendix-Traffic.pdf)

<sup>9</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=433&CountId=7369](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=433&CountId=7369)

Connecticut-East-West am	1,551	11/6/13 count	Discrepant	1,684	11/6/13 count <sup>10</sup>
Connecticut-East-West pm	1,778	11/6/13 count	Discrepant	1,848	11/6/13 count
Wisconsin-Jones Bridge am	1,226	11/6/13 count	Discrepant	1,412	11/6/13 count <sup>11</sup>
Wisconsin-Jones Bridge pm	1,136	11/6/13 count	Discrepant	1,158	11/6/13 count
Bradley-Arlington			Not included		
Wisconsin-Bethesda			Not included		
Old Georgetown-Woodmont			Not included		

3. The Purple Line Station Minor Master Plan Amendment, which was approved in February 2014, found that three intersections (Bradley-Wisconsin Avenue, Bradley –Arlington Road, and Wisconsin/East-West/Old Georgetown) would exceed congestion standards after redevelopment of the Apex and Artery buildings (just one square block in Bethesda).

<sup>10</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=183&CountId=8168](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=183&CountId=8168)

<sup>11</sup> [http://mcatlas.org/traffic\\_report/ReportTrafficCounts.aspx?IntersectionId=234&CountId=8180](http://mcatlas.org/traffic_report/ReportTrafficCounts.aspx?IntersectionId=234&CountId=8180)

**Table 2: Comparison of Bethesda Downtown Sector Plan traffic analysis with Purple Line Minor Master Plan Amendment traffic analysis.**

<b>Intersection</b>	<b>Purple Line Current CLV<sup>12</sup></b>	<b>Plan 2040 CLV<sup>13</sup></b>	<b>Purple Line 2040 CLV<sup>14</sup></b>	<b>Highway Capacity Manual (Grade)<sup>15</sup></b>
Wisconsin/Old Georgetown/ East-West Highway	1323	1203	1654	1.22 (F)
Wisconsin & Bradley	1414	1425	1831	1.38 (F)
Arlington & Bradley	1238	Not Considered	1595	1.71 (F)

**It is not clear how the Planning Board was able to conclude for purposes of the Bethesda Downtown Plan traffic analysis that redevelopment of Bethesda as a whole (and doubling Bethesda’s population) would bring the Bradley-Wisconsin or Wisconsin/East-West/Old Georgetown intersections into compliance, where the Planning Board’s analysis for the Purple Line concluded that the redevelopment of just one square block of Bethesda would cause these intersections to exceed congestion standards. It is also not clear why the Planning Board omitted the Bradley-Arlington Road intersection from its Bethesda Downtown Plan analysis, when its analysis of the Purple Line Plan noted this intersection was a critical “gateway” intersection into Bethesda.**

4. The intersection-specific projection rates used in the Plan’s traffic model are inconsistent with each other and with the population and employment projections of the Plan. The projection rates used in the model appear to significantly understate the impact of development.<sup>16</sup>

<sup>12</sup>[http://www.montgomeryplanning.org/community/bethesda\\_purple\\_line/documents/BPLSTransporationAppendix-Traffic.pdf](http://www.montgomeryplanning.org/community/bethesda_purple_line/documents/BPLSTransporationAppendix-Traffic.pdf)

<sup>13</sup>Source: Bethesda\_CLV.xlsx provided by Planning Department on July 19, 2016.

<sup>14</sup>[http://www.montgomeryplanning.org/community/bethesda\\_purple\\_line/documents/BPLSTransporationAppendix-Traffic.pdf](http://www.montgomeryplanning.org/community/bethesda_purple_line/documents/BPLSTransporationAppendix-Traffic.pdf)

<sup>15</sup>[http://www.montgomeryplanning.org/community/bethesda\\_purple\\_line/documents/BPLSTransporationAppendix-Traffic.pdf](http://www.montgomeryplanning.org/community/bethesda_purple_line/documents/BPLSTransporationAppendix-Traffic.pdf)

<sup>16</sup> It is not clear the extent to which the Planning Department considered Bethesda specific MWCOG projections in developing its regional or local traffic forecasts, as opposed to the more general Montgomery County and metropolitan Washington forecasts. Our questions to the Planning staff about this are still pending.

**Table 3: Growth Projections outlined in the Plan**

	<b>Current (2015)<sup>17</sup></b>	<b>Plan 2040<sup>18</sup></b>	<b>Growth</b>
Households	9,207	17,956	95.5%
Population	18,127	36,666	102.3%
Employment	38,411	49,360	28.5%

To obtain traffic-volume projections for 2040, the Planning Board used “traffic data for a range of years dating from 2010 to 2014, under the assumption that the traffic counts were consistent with current traffic conditions. Traffic-volume projections were produced for each road and intersection individually and in isolation. As shown in Table 4, they ranged from 33 percent growth to 6 percent loss, with a Plan area average of 10 percent growth.

**Table 4: Projected change in traffic volumes by 2040 in the Plan area by intersection, roadway and direction of approach<sup>19</sup>**

<b>Intersection</b>	<b>Roadway</b>	<b>Direction of approach</b>	<b>Projected change in traffic volume</b>
Arlington @ Bethesda	Arlington Rd	N	33%
Arlington @ Bethesda	Arlington Rd	S	33%
Wisconsin @ Jones Bridge	MD 355 (Wisconsin Ave)	N	18%
Wisconsin @ Cedar	MD 355 (Wisconsin Ave)	S	17%
Wisconsin @ Jones Bridge	MD 355 (Wisconsin Ave)	S	16%
Wisconsin @ Cedar	MD 355 (Wisconsin Ave)	N	16%
Wisconsin @ Battery	MD 355 (Wisconsin Ave)	N	16%
Connecticut @ Bradley	MD 185 (Connecticut Ave)	S	15%
Wisconsin @ Battery	MD 355 (Wisconsin Ave)	S	15%
Wisconsin @ East West/Montgomery	MD 355 (Wisconsin Ave)	N	15%
Connecticut @ Bradley	MD 185 (Connecticut Ave)	N	15%
Bradley @ Huntington	MD 191 (Bradley Blvd)	NW	14%
Bradley @ Huntington	MD 191 (Bradley Blvd)	SE	14%
Connecticut @ East West	MD 185 (Connecticut Ave)	S	13%
Connecticut @ East West	MD 410 (East West Hwy)	E	12%
Wisconsin @ Bradley	MD 191 (Bradley Blvd)	W	12%
Wisconsin @ East West/Montgomery	MD 355 (Wisconsin Ave)	S	12%
Wisconsin @ Bradley	Bradley Ln	E	10%
Connecticut @ Bradley	Bradley Ln	W	10%
Old Georgetown @ Arlington	MD 187 (Old Georgetown	NW	9%

<sup>17</sup> MWCOG Cooperative Forecast 8.4.

<sup>18</sup> Plan Technical Appendix F Table 2.

<sup>19</sup> Source: trafficForecasting.xlsx provided by Planning Department on August 10, 2016.

	Rd)		
Old Georgetown @ Cedar	W Cedar Ln	E	9%
Wisconsin @ Elm	MD 355 (Wisconsin Ave)	NW	9%
Wisconsin @ Battery	Battery Ln	W	8%
Wisconsin @ Cedar	Cedar Ln	NE	7%
Wisconsin @ Jones Bridge	Jones Bridge Rd	E	7%
Old Georgetown @ Cedar	MD 187 (Old Georgetown Rd)	SE	7%
Wisconsin @ Cedar	W Cedar Ln	W	6%
Connecticut @ East West	MD 410 (East West Hwy)	W	5%
Old Georgetown @ Cedar	MD 187 (Old Georgetown Rd)	NW	5%
Connecticut @ East West	MD 185 (Connecticut Ave)	N	5%
Old Georgetown @ Arlington	MD 187 (Old Georgetown Rd)	SE	4%
Wisconsin @ East West/Montgomery	Montgomery Ave	E	4%
Wisconsin @ East West/Montgomery	MD 410 (East West Hwy)	E	4%
Wisconsin @ East West/Montgomery	Montgomery Ln	W	4%
Wisconsin @ East West/Montgomery	MD 187 (Old Georgetown Rd)	NW	4%
Wisconsin @ Bradley	MD 355 (Wisconsin Ave)	SE	3%
Wisconsin @ Elm	MD 355 (Wisconsin Ave)	SE	0%
Wisconsin @ Woodmont	MD 355 (Wisconsin Ave)	NW	0%
Old Georgetown @ Arlington	Arlington Rd	S	0%
Wisconsin @ Bradley	MD 355 (Wisconsin Ave)	NW	0%
Wisconsin @ Woodmont	MD 355 (Wisconsin Ave)	SE	0%
Old Georgetown @ Arlington	MD 188 (Wilson Ln)	W	-4%
Wisconsin @ Woodmont	Woodmont Ave	W	-6%

The traffic projections were not balanced across intersections. As a result, some of the projected changes in traffic volume appear to be questionable. Some of them seem inconsistent with each other because proximate intersections are projected to experience traffic growth at markedly disparate rates. For example:

- The intersection of Arlington Road and Bethesda Avenue is projected to have 33 percent southbound growth on Arlington Road, while the nearby intersection of Arlington Road and Old Georgetown Road is projected to have zero southbound growth on Arlington Road.
- Wisconsin Avenue is projected to have zero northbound growth at Bradley Boulevard and at Woodmont Avenue, but 9 percent northbound growth at Elm Street and 15 percent northbound growth at Montgomery Avenue.
- Connecticut Avenue is projected to have 15 percent northbound growth at Bradley, but it is projected to only have 5 percent northbound growth at East-West Highway.

The traffic-volume projections also seem inconsistent with the levels of population and household growth identified in the Plan. For example, the number of households in the southern third of the Sector (TAZ 637) is projected to increase from 2,223 to 6,371 (a 287% increase).<sup>20</sup> In light of this projected population growth, the Planning Board's assumption that there will be zero growth in traffic on Wisconsin Avenue at Bradley and at Woodmont seems improbable.

Use of correct CLV counts and more reasonable projection rates is important because the Planning Department's traffic model is particularly sensitive to small changes in the projection rate. Increases of less than 1% per year for some intersections would result in particular intersections exceeding the congestion standards. For example:

- If the projection rate used for Wisconsin and Bradley were 17 percent (less than 1 percent per year over the life of the Plan) instead of zero percent, the intersection would exceed congestion standards.
- If the projection rate used for Old Georgetown and Arlington were 28 percent instead of 9 percent, the intersection would exceed congestion standards.

5. The analysis assumes a number of transportation improvements in the region's Constrained Long Range Plan (CLRP) including (i) completion of the Purple Line between Bethesda and New Carrollton, (ii) elimination of the WMATA turn-back at Grosvenor, (iii) addition of express tolls on I-270 from I-370 to Frederick, and (iv) HOV lanes on I-95 between the ICC and MD 198. It is not clear to what extent the traffic analysis results depend on traffic reductions associated with these four major transportation improvements. If these improvements are not implemented, are not implemented in a timely manner, or do not reduce traffic to the anticipated degree, then the model results reported in the Plan reflect an underestimation of the impact of the proposed development on congestion.

### **Conclusion:**

As outlined above, there are a number of potential problems with the traffic analysis that was conducted for the Plan. We think it likely that if the analysis is revised, a number of intersections within the Bethesda Plan area will be found to exceed the congestion standards. Given the importance of the Bethesda Downtown Plan, we recommend that the County Council consider utilizing the integrated demand/traffic stimulation model developed by the National Transportation Center at the University of Maryland, which considers the cumulative effect of development and dynamic impact of queuing. This model was developed for analysis of the Intercountry Connector and the Chevy Chase Lake sector plan, and currently covers most of the Plan area.<sup>21</sup>

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<sup>20</sup> Compare Cooperative Forecast 8.4 (TAZ 637) with Technical Appendix F at Table 2 (TAZ 637).

<sup>21</sup> A presentation concerning the model can be found at: <https://www.dropbox.com/s/t1ouujtmzjlqybg/Montgomery%20County%20DOT-Jan%202016.pdf?dl=0>

## School Capacity

The Plan area is served by Bethesda Elementary School, Westland Middle School, and Bethesda-Chevy Chase High School. Westland Middle School and B-CC High School are currently experiencing significant overcrowding. A second cluster middle-school is scheduled to open in August 2017 but will be at capacity almost immediately. Even after completion of a final addition to B-CC High School it is likely to be over-crowded. And despite the recent completion of an addition to Bethesda Elementary School, it is already over capacity. Site constraints at both Bethesda Elementary School and B-CC High School mean that no further expansion of these schools is possible.

### Plan Findings and Board of Education Comments:

The July 21, 2016 draft notes that the Plan provides for up to 8,456 new multi-family high-rise housing units. Based on student generation rates for this area of the county, the Plan concluded that at full build-out, the new housing would result in approximately 695 new students (355 elementary school students, 145 middle school students and 195 high school students) (Plan page 92). The Plan acknowledges that Bethesda Elementary School is at capacity now and that no additional capacity can be added due to site constraints, that even after opening of the second cluster middle school, there may be no space at the middle-school level, and that B-CC High School may be over capacity even after completion of the addition. The Plan notes that B-CC “will be at the high end of the desired enrollment size for high schools.” (Plan pages 92-94).

On March 24, 2016, the Montgomery County Board of Education (BOE) submitted comments to the Planning Board regarding the Plan, noting that the combined effect of the Bethesda, 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.” BOE noted that the combined impact of these Plans would result in 649 new elementary school students, 273 middle school students, and 353 high school students. Of these, they estimated that Bethesda would contribute 795 new students (405 elementary, 170 middle school, and 220 high school students). The BOE estimates for student generation exceed those in the Plan by 14%.

As relevant to the Bethesda Plan, the BOE letter concludes that:

- Accommodating this number of new “elementary school students will require opening a new elementary school”;
- Accommodating the high school students “will be much more challenging” because even with the addition B-CC will exceed capacity by 2021, and “enrollment increases already are straining the high schools surrounding the BCC Cluster.”
- The planned assessments of school impact taxes and school facilities payments on developers will likely be insufficient because these charges “do not account for the increases in construction costs, do not consider the cumulative impact of multiple master plans on the need for school capacity. . . [and] do not include possible site acquisition costs,” which is a problem for master plans that “focus on infill and urban development where land costs are very high and potential properties are extremely difficult to find.”

- “[T]he master plans should be thoroughly reviewed now to ensure that adequate public facilities, such as schools, can be provided in the future with fewer difficulties.”

The Planning Board did not update the student projections in the Plan to match the higher numbers provided by the BOE, nor did the Planning Board address the BOE’s concerns about the options proposed in the Plan for accommodating the additional students.

### **Our Review:**

After reviewing school enrollment projections, we disagree with the draft Plan’s conclusion that area schools can accommodate the growth associated with the Bethesda Sector Plan without exceeding school “utilization thresholds.”

Specifically, we found:

1. The draft Plan used student generation projections that are too conservative.
  - a. The student projections in the draft Plan are lower than the forecasts included in BOE’s March 2016 letter to the Planning Board. In this letter, BOE estimated that the development proposed for Bethesda would result in an additional 795 students (elementary, middle school, and high school). This estimate is 14% higher than the Planning Board estimate (695 elementary, middle school, and high school students).
  - b. The student projections in the draft Plan are based on a student generation rate of .082, which is lower than the rate published by MCPS.<sup>22</sup> The 0.082 rate is also 70% lower than the student generation rate of 0.139 that was proposed for multi-family high-rise development in the July 2016 draft Subdivision Staging Policy (SSP). Applying the 2016 SSP rate, we estimate that the proposed development in Bethesda could result in 1,175 new students, which is 69% higher than the Planning Board estimate.
  - c. The Plan’s conclusion regarding the ability of schools in the B-CC cluster to accommodate additional students does not consider the increases in student population due to the Westbard, Chevy Chase Lake, and Lyttonsville plans, all of which will be adding housing to the B-CC cluster during the life of the Bethesda Downtown Plan.
  - d. In projecting student generation, we believe both the Planning Board and MCPS staff made two assumptions that resulted in an understatement of the impact of the proposed development on student-generation.
    - The planners used student generation rates for the southwest portion of Montgomery County, which are 25% to 50% lower than countywide rates, rates for other regions of the county, or the generation rates proposed in the July 2016 draft SSP (see Table 5). This presumes that the proposed development in

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<sup>22</sup> See Montgomery County Student Generation Rates for Housing Types (Feb. 24, 2016).

Bethesda will follow prior development patterns, where multi-unit high rise housing has been built predominantly to serve as luxury retirement condos, rather than workforce or millennial housing. In this regard, the demographic assumption is inconsistent with other stated goals of the Plan to encourage both workforce and millennial housing.

- The planners assumed that every one of the 8,456 new units will be “multi-family high-rise” housing (that is 130 feet and higher), which has a substantially lower student generation rate (approximately 33% lower) than other types of potential development such as “mid-rise” or “low-rise” buildings. While much of the new housing built under the draft Plan is likely to be high-rise, the Plan does provide for a significant number of mid-rise buildings, so this assumption may have resulted in use of an overly conservative student generation rate (see Table 5).

**Table 5: Comparison of Bethesda Downtown Plan student generation rate and projections with other applicable rate and corresponding projections**

Source	Student Generation Rate	Projected Student Population Increase
July 2016 Draft Plan	.082	695
MCPS Southwest Region Multi-Family High Rise	.093	787
July 2016 Draft SSP Multi-Family High Rise (county-wide)	.139	1,176
MCPS Southwest Region Multi-Family Low to Mid Rise	.223	1,886
MCPS Draft SSP Multi-Family Low to Mid Rise (county-wide)	.385	3,256

2. The Board of Education warned that enrollment increases were already straining the B-CC cluster and adjacent clusters, making school boundary realignment impolitic and impractical. In addition, other area high schools are projected to be significantly over capacity (Walt Whitman by 200 students, Albert Einstein by 400 students, and Walter Johnson by 500 students).

Although the Plan identifies specific MCPS facilities outside the sector that could be reopened to address school overcrowding, none of the identified properties could feasibly be repurposed:

- a. Elementary Schools: Two former elementary schools, Lynbrook and Rollingwood, were identified in the Plan as potential candidates to reopen. Both of these facilities are outside the Plan area.
  - Lynbrook (in East Bethesda) is .9 miles from the Bethesda Metro, but is currently designated as the location for the MCPS Department of Special Education Services school for students with disabilities. Lynbrook could not be repurposed as an elementary school without finding a substitute facility.

- Rollingwood is 2.0 miles from the Bethesda Metro, and it is currently leased to the French International School. The school's condition has significantly deteriorated. Given its distance from the Plan area, it could not be repurposed as an elementary school without significant school boundary realignment.

b. High School: The Plan identified Woodward High School as a potential candidate to reopen. Woodward is located 4.3 miles from the Bethesda Metro station, well outside the Plan area. It is currently being used as Tilden Middle School while Tilden is renovated. In addition, we have been advised by the PTAs that Woodward has been promised to the Walter Johnson cluster to address overcrowding there.

### **Conclusion:**

The analysis of school capacity conducted by the Planning Board used conservative student generation rates that are inconsistent with some elements of the Bethesda Plan, and far lower than the student generation rates proposed in the 2016 draft SSP. The discussion in the Plan of the options for accommodating the additional students makes it clear that doing so will be extremely challenging. It is critical that a plan be developed to accommodate the expected expansion of the school population so that the quality of education in the B-CC cluster schools does not decline.

### **Water, Sewage, Sewers and Other Infrastructure**

The Plan provides that the resident population of Bethesda will more than double from 2015 to 2040 -- from 18,127 residents in 2010 to 36,788 in 2040.<sup>23</sup> The Bethesda Plan does not discuss the adequacy of downtown Bethesda's water and sewer systems, nor does it discuss whether the existing infrastructure can accommodate the high level of growth provided in the Plan. We are not aware of any analysis conducted by either the Planning Staff or WSSC regarding the ability of the current infrastructure to accommodate double the current population, and in response to our request for such analysis, were told that no such analysis has been documented.

Yet, the July 2016 draft Subdivision Staging Policy notes that Montgomery County's "water distribution and sewage collection system is aging" and "maintenance and replacement of this infrastructure is vital for continued adequate public water service."<sup>24</sup> The draft SSP further notes that while "accommodating the County's future growth through redevelopment of traditional centers presents excellent opportunities for improving and funding water supply and wastewater treatment . . . a determination of whether the existing infrastructure in these centers is sufficient to handle the projected increase in development is necessary."

The Plan does note that currently "the majority of downtown Bethesda has no stormwater management" and that the water quality of all three nearby tributaries (Coquelin Run, Bethesda

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<sup>23</sup> Technical Appendix A at 46 (2010 figure); Technical Appendix F at Table 2 (2040 projection).

<sup>24</sup> SSP at 12.

Mainstream, and Willett Branch” are “poor” due to “a high impervious cover . . . and lack of stormwater treatments.” Plan at 60, 63-64.

The Bethesda Plan needs to be supported by an analysis of the impact of population growth and new development on water quality and stormwater management.

### **Conclusion**

The rezoning of downtown Bethesda is done correctly, the new Sector Plan represents the potential for billions of dollars to be invested in new buildings in downtown Bethesda, and such development would produce significant annual tax revenues and be an engine that drives Montgomery County. But it is important that the rezoning be done correctly, and in a manner that ensures that streets, schools, and infrastructure can accommodate this growth. If the rezoning is not done correctly – if traffic congestion is insufferable and schools remain overcrowded -- it will be detrimental and drive employers and residents to leave.

The analysis presented by the Planning Board uses data that understates current conditions and models the future by using unrealistically conservative assumptions regarding growth. In short, the Planning Board’s analysis does not support its conclusions that the draft Plan is in balance and provides for adequate public facilities. The Plan, in short, fails.

Given the importance of the Bethesda Downtown Plan to the future of Montgomery County, the County Council and county residents should demand more from the Planning Board. The Plan should not be approved unless and until the Planning Board can demonstrate that area roads will not be overly congested with traffic, the schools will not be overcrowded beyond their capacity, and other critical infrastructure can accommodate this growth. Bethesda’s future is too important to Montgomery County to get wrong.