

**Testimony on the
Scope of Work for the Bethesda Downtown Sector Plan**

**Christine Real de Azua
4502 Elm Street Chevy Chase MD**

To: Montgomery County Planning Department
Re: Scope of Work for the Bethesda Downtown Sector Plan
Date: January 29, 2014

I am Christine Real de Azua and I reside and work a half-block away from downtown Bethesda. I am therefore directly affected by current conditions and by planning for Downtown Bethesda. I live on Elm Street just three houses down from Elm Street Park and the proposed Purple Line Station that is intended to become the hub of downtown Bethesda.

I may in fact be one of the kinds of residents you have in mind when envisioning what Downtown Bethesda may become: a local resident who is an eager pedestrian and runs many errands on foot; someone who mostly works from a home office thanks to the wonders of the internet and telecommunications; a Metro user; and an eager biker who when working downtown or biking for pleasure uses the existing tunnel and the Capital Crescent trail.

I am also a member of the Society for Conservation Biology whose work informs my comments even although I am testifying on an individual basis.

Bethesda is a uniquely privileged part of the Montgomery County—thanks in large part to the tax dollars generated from communities like the one in which I live and work and that surround the downtown Bethesda area.

It behooves you as planners, and citizens like myself, to strive for a vision and a reality that goes beyond the mere requirements of the law and that sets a new goalpost in sustainable development. The bottom line, therefore, is that Bethesda should and can afford to be a shining example of environmental sustainability, and not just another example of business as usual with a few green tweaks here and there, and the scope of work should drive that vision.

To reflect this intent, the “Purpose of the Plan: Sustaining Bethesda” (page 3 and following) should therefore include the following:

(1) On Page 3, after “a great place to live, work, and play,” insert the following paragraphs and bullets:

“The Plan will not only support the purposes already set by the County, state and federal government in its laws, but go beyond those purposes in planning for

development that is truly sustainable. Planning and zoning, in particular, go hand in hand. The Bethesda Downtown Plan will fully support the Purpose of the County's Zoning Ordinance and be designed, as stated in the ordinance, to:

- A. control street congestion;
- B. promote health, public safety, and general welfare;
- C. provide adequate light and air;
- D. promote the conservation of natural resources;
- E. prevent environmental pollution;
- F. avoid an undue concentration of population; and
- G. promote or facilitate adequate transportation, water, sewerage, schools, recreation, parks, and other public facilities.

These purposes will promote the three economic, social and environmental pillars of sustainability" in the following ways:

(2) Economic Sustainability

[Under "Economic Sustainability" add the following bullets]:

- Attract and retain leading edge businesses and workforce;
- Ensure a sustainable articulation with surrounding communities;
- Integrate climate preparedness into planning and building design to avoid even larger costs as climate extremes intensify;
- Ensure adequacy and timing of public facilities including sewerage, greenways and natural buffers, schools and daycare, and parks and recreation areas, so that these precede and sustain development and population growth, and avoid large "catch-up" costs.

(3) Social Sustainability

[Under "Social Sustainability" add the following bullets]:

- Foster employment, daycare, and recreational opportunity;
- Promote public health and well-being with green buildings and green space.

(4) Environmental Sustainability

[Under "Environmental Sustainability" add the following bullets]:

- Enhance water quality and management in all its aspects, from supply to storm-water and sewerage management, including through investment in green buffers to sustain a thriving downtown and neighboring communities while exceeding County, state, and federal Clean Water Act standards ;
- Enhance air quality and prevent local air pollution, both indoor and outdoor, by effective green buildings requirements and incentives as well as pedestrian areas and green spaces that naturally clean the air and temper excessive heat and cold;
- Ensure and plan for light and air, including for public spaces and for parks and buffer areas;
- Sustain Bethesda's local watersheds and ensure that the intense growth at the very apex of the watershed line for two local watersheds (watershed of

Coquelin Run, a key tributary to Rock Creek to the east of Wisconsin Avenue, and watershed of Little Falls to the west of Wisconsin Avenue) does not harm the integrity, water recharging services, recreational services and native biodiversity of those local areas;

- Plan for biodiversity conservation and restoration, protect and acquire space for green buffers, parks, and natural green corridors, and reap the multiple clean air, clean water and quality of life services that these green spaces provide;
- Extend Maryland's "green infrastructure" corridor that currently encompasses Rock Creek so that it includes a network of public and private natural green space and infrastructure and the Coquelin Run watershed.

In order to effectuate these purposes and even simple compliance with existing law, the plan and the planning process must build in specific steps and objective and measureable criteria to meet the legal standards and to stay well within compliance of them ahead of any growth that would push us closer to the legal limits.

For example, as it is, the Montgomery County and D.C. sewer systems and permitting authorities are not in full compliance with the law, with DC seeking to extend the deadline of its consent decree and Montgomery County also facing two similar issues vis a vis an existing consent decree, also from 2005 and a December 2013 court opinion directing the authorities to devise more specific enforceable criteria to assure compliance with the Federal Clean Water Act.

In addition, the very same run-off and sewage outfalls in DC and Montgomery County threatened to undercut the stream bank habitats of the endangered Hay's Spring amphipod and the state-endangered Kenk's amphipod which is slated for Federal listing in 2016.

Failure to maintain forest cover also increases ground level ozone and particulate pollution so dense development may have Clean Air Act consequences not foreseen by the careless.

Failure to build compliance into the plan in advance risks halting development or utility hook-ups in mid-construction, driving down the county's bond ratings, driving up the cost of borrowing, and driving away the very high quality businesses and well-educated residents we most want to attract.

Citizens watching will be sure to challenge this plan or permits issued in reliance upon it if it does not meet these legal standards.

I look forward to seeing this plan become, not painful growth that "smarts" as our grandparents use to say, but a model of sustainable planning.