

Item 7 - Correspondence

From: [Katie Nolan](#)
To: [MCP-Chair](#)
Subject: Thrive 2050 written testimony
Date: Wednesday, November 18, 2020 10:08:12 AM
Attachments: [Katie Nolan Thrive 2050 Testimony.docx](#)

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

Good morning! Please find my written testimony for Thrive 2050 attached.

Katie Nolan (she/her/hers)
(410) 960-4979 (mobile)

Katie Nolan
1529 W Falkland Lane, Apt 242
Silver Spring, MD 20910

Thrive 2050 Testimony

Good afternoon and thank you for your time. My name is Katie Nolan. As a renter with no car in a single-income household, I'm very excited about plans to make the county more affordable and easier to travel around without a vehicle.

We need better public transportation. Before my roommate lost her job, she sometimes spent more time in transit than she did at work, despite the fact that her job was a mere seven minute drive from our apartment. People can't sustain their lives like that.

We also need more affordable housing and better support systems for the disabled. My friend Sebastian and his wife should be able to live in an actual home instead of pan-handling every day for an AirBnB in someone's basement because they can't get work.

But we also need to make racial equity and economic justice priorities for our future. I currently live in downtown Silver Spring, but for the seven years prior I lived on Flower Avenue where it intersects with Piney Branch Road. Every time I passed the Purple Line stop construction, I wondered whether Universal Supermarket, where I got most of my groceries, would get replaced by a 7-11; whether Beijing Delight would get replaced with a Panda Express. I worried that gentrification would drive out my neighbors, many of whom were Spanish-speaking immigrants.

Historically, "growth" without racial equity has led to the destruction of Black and Brown communities. In the 1950s and 1960s, "growth" along River Road in Bethesda led to the annihilation of River Road's African American community. My friend Harvey's childhood home is now a Whole Foods. Another friend's home is now a Bank of America. Because of "growth," County Executive Elrich has ignored Macedonia Baptist Church's calls for justice and allowed Bethesda Self-Storage to continue the desecration of a cemetery that predates the Civil War.

On the County Council's website for Bill 27-19, it says: "Racial equity and social justice are urgent moral and socioeconomic endeavors for our community. Our county's population has changed, both in numbers and in diversity, and this did not happen overnight. Addressing issues of racial equity is not only an ethical obligation; it is essential to ensure the continued economic vitality of our community."

Thrive 2050 has the potential to be life-changing for me and my community. If it's going to live up to that potential, it must prioritize racial equity.

From: [Beth Merlo](#)
To: [MCP-Chair](#)
Subject: Thrive Montgomery 2050 testimony
Date: Wednesday, November 18, 2020 10:38:52 AM

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

Good morning,

I am writing this email in support of the Montgomery for All platform for Thrive Montgomery 2050. I have been a renter in the downtown Silver Spring area for 14+ years. From living with roommates to living on my own to now living with my husband (who I met standing on the Silver Spring metro platform), year after year I have chosen living in a walkable neighborhood to buying a home. I know I am not the only one.

In discussions with my local friends, affordability, lack of easy access to transportation, and the length of commutes are top reasons why so many of us have not bought into the community we are very happily living in, even as we age into the time of our lives when buying a house is "normal." We are the next generation of citizens, and yet, I do not feel as though there is a place for me as it currently stands.

I cannot afford the \$700,000 to \$1M+ homes that are in the neighborhood a block away from my apartment building and almost no new condo units have been built in the last eight years in downtown Silver Spring. Existing condos are hot commodities staying on the market for only a few days. Yet, most are only 1 or 2 bedrooms, which mean that a family may find themselves out of space quickly, especially with work-from-home becoming a new norm. Meanwhile, apartment building after apartment building has gone up. These create much needed density and living units, but apartments create a transient population, not one that stays and reinvests into the community they are tied to. And after years of experience renting in multiple complexes, older renters are often punished with rent increases, while new renters are given the discounts. This just reinforces the idea that I should not stay even though my husband and I love this area.

With the significant growth in the Montgomery County population, we cannot afford to rest on our suburban history. The communities built so many decades ago do not and cannot support the current needs of the people who live here. For those of us, like me, who work in downtown DC, metro is an excellent way to commute, but Montgomery County is NOT close to the business center of DC. Adding even a mile or two commute in current traffic can add 20+ minutes to an already long-enough commute. Buying a house in an "affordable" neighborhood would mean an hour+ commute for me and my husband for days we have to go into work. I watched my parents do this for years, and I know it's not sustainable in a healthy way.

I have no desire to see old neighborhoods torn down in favor of massive housing complexes, which is why I support Montgomery for All's approach of adding in the missing middle by supporting ADUs and low-rise, smaller housing units. This is smart growth.

I realize that my area of Montgomery County is very different from other areas, and I appreciate that Thrive 2050 must take into account all of our different needs, but walkable

communities that allow for people of all incomes to live well and for people to age in place with dignity need to be a priority. Population growth is not going away. We need to build for the future that is coming, not the suburban ideal of 1950 that proved to be unsustainable.

Thank you for your time and consideration,
Elizabeth Merlo
8616 2nd Ave, Apt 420, Silver Spring, MD 20910
908-303-1254

From: [harold.pfohl](#)
To: [MCP-Chair](#)
Subject: NOV 19TH - GEN PLAN TESTIMONY & RELEVANT HUD NEW COMMUNITIES EXPERIENCE
Date: Wednesday, November 18, 2020 10:47:51 AM
Attachments: [Harold Pfohl General Plan testimony.docx](#)

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

Please accept the attached document as my written testimony for the public hearing on the Thrive Montgomery 2050 General Plan.

Please confirm receipt of this, and thank you in advance for your assistance,
Harold Pfohl

GENERAL PLAN CRITIQUE
&
HUD NEW COMMUNITIES EXPERIENCE

November 19, 2020

My name is Harold Pfohl and I live in Sumner Village.

Thank you for the opportunity to testify.

The concept of Complete Communities is a case of déjà vu for me. In 1976 I came down to Washington as part of a team to analyze the HUD New Communities Program. In the midst of all the civil rights strife and social upheaval of the 1960s the Johnson Administration listened to urban planners who believed that they had a solution to the social distress, New Communities.

As a result Congress passed legislation that enabled HUD to issue bond guarantees for the private development of 13 new cities on raw land in various parts of the country. These developments incorporated all of the avant-garde urban planning for bike paths, walkability, commercial centers, trails, architectural covenants, etc. The idea was Build It and They Will Come, black-and-white, rich and poor will love each other and live in peace and harmony. They were all failures. In the excitement of getting these dream communities created HUD had little interest in financial feasibility. The projects were incredibly complex, the front end costs were enormous, and HUD loaded them with social conditions.

From that perspective I look at the Thrive Montgomery 2050 concept of Complete Communities which is a result of a great deal of hard work by many good and well-meaning people. I see a utopian plan that is so vast in size, so broad in scope and so unbelievably expensive that it doesn't have a prayer of being implemented at any meaningful level over the course of the next 30 years.

Dense development with ready access to Metro stops makes a great deal of sense. But value of such property is so great; how do you incorporate parks, trails and open space? And by the way, how much of that is coming into existence as a result of the incredibly dense development occurring in downtown Bethesda?

Creation of Thrive Montgomery's Complete Communities within areas that are fully built out requires the acquisition, demolition and redevelopment of numerous residences. The cost of that is huge – will it be feasible? And the acquisition of land for trails? Parks?

The entire general plan is directed toward walking, bicycling, and the use of transit. The use of an automobile is anathema. In order for this to succeed the network served by public buses needs to increase astronomically along with the number of buses. The cost of that is huge. Not long ago there was a move to decrease the number of buses serving various lines due to cost. And now?

To dis-incentivize the use of automobiles the plan proposes to reduce public parking and increase the cost of remaining public parking to market rates. Diversity and inclusion are

core to the plan. If people in single-family residential neighborhoods need to walk 15 minutes to bus stop, wait for a bus to downtown Bethesda in order to shop, enjoy dining there or take in a movie the odds are that the plan will effectively have excluded them from Bethesda by making it arduous to get there. How much will the plan exclude people? What are the unintended consequences?

Pedestrian and bicycle safety receives great emphasis. Nowhere is there any plan dealing with the great danger that bicyclists pose to others in their nearly complete disregard of traffic laws whether on a street or on a trail. It is more than a little hazardous to be on a trail with bicyclists coming from behind, giving no warning, and often at considerable speed. I say this having cycled for thousands of miles.

With respect to housing and economic development the plan takes the position that if affordable housing is available then business will come to Montgomery County. The County most certainly needs affordable housing, but insofar as attracting business is concerned and insofar as employment is concerned transportation is far and away the most important consideration. Finish the purple line and radically improve bus service, thereby improving access to jobs and correspondingly, improved income.

There are four cornerstones to strategy: people, assets, time, and money. The County is suffering severe revenue shortfall as a result of the economic collapse due to Covid 19. Additionally there has been virtually no net new business formation over the past decade and hence very little increase in public revenue from business and little in the way of new job opportunities. The plan ignores the costs and at the end states that this will be dealt with on an individual project basis, and secondly that new resources and new solutions will be found.

Matters of money/revenue cannot be set aside in establishing a plan. The elements of the plan are interrelated and action on one part will affect another. For example, how can one demand walking and bicycling when bus service is poor and the cost of significant improvement of service is very high?

The authors posit that Thrive Montgomery 2050 is a necessary plan to deal with the unprecedented uncertainties we face. If so, where is the section dealing with the possibility of significant increase in population with no meaningful increase in employment/business? With long term diminished revenue? Proceeding with the assumption that uncertainties are limited to whether conditions will improve greatly, or moderately ignores the possibility that things will get worse. If the plan must be adopted now, then the plan must consider how to proceed if negative conditions are prolonged.

This plan is full of dreams and aspirations that are way beyond reach. It is being put forth at a time of chaos. Given the sheer size of it and amount of labor that has gone into it no doubt it has much bureaucratic inertia to proceed and with good and decent people behind it. But that is not a sound reason to impose a utopian plan on the County for the next 30 years.

Wait a couple of years until things settle down and we can get a better view of the future. Then let's revisit this.

From: [Todd Hoffman](#)
To: [MCP-Chair](#)
Subject: Town of Chevy Chase Testimony on Thrive Montgomery 2050
Date: Wednesday, November 18, 2020 10:58:06 AM
Attachments: [TOCC Testimony on Thrive Montgomery 2050 11-19-20.pdf](#)

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

Attached is a copy of the Town of Chevy Chase's testimony to be provided at the Montgomery County Planning Board's November 19 Public Hearing on Thrive Montgomery 2050. Thank you.

Todd Hoffman
Town Manager
Town of Chevy Chase, Maryland
[4301 Willow Lane](#)
[Chevy Chase, MD 20815](#)
P: [301-654-7144](#)
F: [301-718-9631](#)
thoffman@townofchevyCHASE.org

Town of Chevy Chase Testimony
Montgomery County Planning Board Public Hearing on Thrive Montgomery 2050
Irene N. Lane, Town Councilmember
November 19, 2020

Good afternoon. My name is Irene Lane and as a Town Councilmember, I speak on behalf of the Town of Chevy Chase. We very much appreciate the hard work that the Planning Board and staff have put into the development of this transformational plan with its laudable goals.

The Town along with 26 other communities representing over 33,000 residents has already submitted a united set of detailed written comments. Today, I would like to focus on four suggestions for improvement.

First, the **Definition of Complete Communities**: The Plan should specify the parameters for the diverse urban, suburban, and rural “Complete Communities” that exist throughout the County. In addition, in order to meet the County’s affordable and attainable housing goals, we encourage you to increase and diversify the areas for Missing Middle housing as affordable housing is more realistically achievable in areas outside the one-half mile zones around rail and BRT. Also, the Plan should leverage naturally occurring affordable housing options including adaptive re-use of malls and other retail/office buildings which post COVID-19 may no longer be viable for their original and intended use.

Second, the **Recognition of Municipal Regulatory Authority & Community Input**: While we understand the need for more affordable Missing Middle housing, the Plan’s implementation process should expressly state that the Plan’s policies and actions will be applied in a manner compatible with the current Master & Sector Planning process as well as within the current physical features of local neighborhoods. We recommend that the Plan expressly state that local municipalities continue to retain regulatory authority over building regulations for *all types* of residential housing within their jurisdictions, including Missing Middle housing, and that unincorporated neighborhoods have a *real say* about the physical changes that are being proposed within their boundaries.

Third, the **Strategy for Finance & Investment**: We strongly recommend that Thrive Montgomery provide equal weight to the importance of job creation, transit, and housing and include strategies for how public revenue will substantially increase in order to fund the Complete Community concept with its decentralized public facilities, small local schools, and transit infrastructure projects. Essentially, there needs to be a plan for how the County will thrive *economically* by attracting new industries, companies and small businesses to the County.

Fourth, the **Economic & Lifestyle Impact of COVID-19**: As this Plan will impact all residents, business owners, employees, regional commuters, and visitors for decades to come, we feel it is

important to factor in the changing realities of living and working as a result of the pandemic. Let us not forget that only two weeks ago, the Chairman of the Federal Reserve stated that while recent progress toward a vaccine was welcome news, it was “just too soon to assess with any confidence the implications of the news for the path of the economy...and that the post-pandemic economy (was) going to be different in some fundamental ways.” The Plan should design for the likelihood that the County’s budget will be severely constrained for some years to come – something that no number of PPPs will remedy.

We strongly recommend that careful attention be paid to and revisions be made based on the suggestions, concerns, and questions outlined in the Community Coalition’s detailed letter.

Thank you for your consideration.

From: [Alain N](#)
To: [MCP-Chair](#)
Subject: Testimony on behalf of Thrive Montgomery 2050
Date: Wednesday, November 18, 2020 11:43:41 AM
Attachments: [Thrive Montgomery 2050 - Testimony of A. Norman \(Nov. 19, 2020\).docx](#)

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

Dear Chairman Anderson,

Please find attached my written statement which I hope you have incorporated into testimonies considered by the Planning Board as regards the draft plan Thrive Montgomery 2050.

I also hope to be able to read the same in person tomorrow evening at the meeting, but certainly thank you in advance for including the written statement which I hope you all will find is a positive contribution to the effort.

Best regards,

Alain Norman
Silver Spring

Testimony of Alain Norman on behalf of the “Thrive Montgomery 2050” Draft Plan
November 19, 2020

Chairman Anderson, ladies and gentlemen,

Thank you for the opportunity to provide some brief remarks in favor of the new, draft, plan “Thrive Montgomery 2050.” My name is Alain Norman, I currently reside in Silver Spring and I grew up in Montgomery County.

I would like to focus on what I see as three key pillars to the future success of this County, each of which is – I’m happy to note – covered by the draft plan, although they are mentioned across more than one of the plan’s nine “Plan Elements.”

First, having attended public schools in the County, I know that maintaining an excellent public school system is crucial to the ensuring that people can thrive in this County, in this country, and in the face of global competition. So, I applaud the plan for repeatedly emphasizing the need to facilitate access to schools at all levels. I might urge the County to ensure that funding goes to build as many schools as possible to avoid overcrowding and – given current trends – to take all relevant steps necessary to ensure students have access to computers and the Internet to be able to receive excellent education virtually.

Second, let me touch on the intertwined issues of economic wellbeing and environmental sustainability. I am thrilled that the draft plan repeatedly notes the need to facilitate access by foot or on bicycle to places of work, shops, parks, and other points of interest. I have worked with the County to have a multi-use path installed on what remains a sidewalk-less, but important, roadway, and so I know first hand how important it will be for the County to incorporate such facilities more frequently throughout the County. Moreover, helping people move around without resorting to cars will enhance safety, improve quality of life, encourage consumers to shop at local businesses, and help Maryland meet its greenhouse gas reduction goals. Similarly, ensuring that people have access to green spaces, and/or opportunities to engage in, say, community gardening throughout the County, will help improve quality of life, sustainability, and the sort of community cohesion likely to support local small and medium businesses.

In short, I agree with the thrust of the plan to improve everyone’s quality of life through efforts to improve access to educational opportunities, generally, and by planning for sustainability, notably in the form of more bike lanes and/or ensuring walkability in future developments. I might simply suggest that the plan, which is quite ambitious and often aspirational, be pruned of words like “ideally” so as to make its tone a bit more forceful, as that might later help with getting funding for implementation of the plan when battles over budgets take place during the next 30 years.

Thank you.

From: [Ken Bawer](#)
To: [MCP-Chair](#)
Subject: WMCCA Testimony on Thrive Montgomery 2050
Date: Wednesday, November 18, 2020 11:43:50 AM
Attachments: [WMCCA Testimony on Thrive Montgomery 2050 Written Final.pdf](#)

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

Dear Chair Anderson,

Please find attached the WMCCA testimony on Thrive Montgomery 2050.

Sincerely,

Ken Bawer

West Montgomery Citizens Association

WEST MONTGOMERY COUNTY CITIZENS ASSOCIATION

P.O. Box 59335 • Potomac, Maryland 20854

Founded 1947

Testimony of Kenneth Bawer for West Montgomery County Citizens Association

**Montgomery County Planning Board Public Hearing for
Thrive Montgomery 2050
Public Hearing Draft Plan**

November 19, 2020

**West Montgomery County Citizens Association (WMCCA)
General Comments**

Thank-you Chair Anderson and members of the Planning Board. My name is Kenneth Bawer. I am representing the West Montgomery County Citizens Association. We would like to thank the Planning Board for this opportunity to comment on the draft General Plan revision. We acknowledge the efforts of those who have contributed to this very important document. Clearly, a lot of time and thought went into this document and we thank you.

The pandemic: First, we would like to suggest that the time frame for finalizing this document be greatly extended due to the pandemic. The pandemic is a once-in-a-century disaster. It has been extremely disruptive and will have uncertain consequences. Some residents still may not have commented on the plan during this pandemic for any number of reasons.

These reasons might be a trauma due to loss of a loved one, hardships caused by loss of a job or a closed business, or having a student doing remote learning at home causing challenges for the entire family. It would be helpful to post on the Thrive web site what percent of residents have commented to date.

Furthermore, the long-term consequences of the pandemic are unknown. The current draft plan could be inappropriate for the reality of a post-pandemic County. As a result of our shared experiences during the pandemic, personal and professional choices may

change. People may favor less dense housing arrangements for health reasons. Transportation preferences and commuting patterns may change dramatically if workers are allowed to continue telecommuting after the pandemic. Continued high levels of telecommuting may cause a drastic downturn in the commercial office space market. Therefore, we recommend pausing the finalization of this plan at least until the consequences of the pandemic start to become clear.

We appreciate this opportunity to make comments to improve this draft plan. There is a lot in this draft that we do like. While we agree with many of the principles, we do have suggestions that differ in their focus.

(NOTE: Some suggestions in our written comments may be too specific for the General Plan, so please consider them as food for thought and input to functional plans, for example.)

Our vision for 2050 is a County where we don't compare our growth to other jurisdictions, but where our main goal and indicator of success is not growth but is being at the top of the Happiness Ratings using the same metrics as the World Happiness Report. (https://en.wikipedia.org/wiki/World_Happiness_Report#Methods_and_philosophy)

Our vision for 2050 is a County which is not developer-centric but rather is resident-centric and environment-centric, where the focus is on sustainable growth, not simply population, business, and job growth. The current draft Plan treats population growth as an expectation, rather than either a desired goal or a potential problem. Job and business growth must only be pursued on a sustainable basis, that is, only if they can be attained without negatively impacting quality of life (including, for example, air and water quality, traffic, and yes, our happiness rating) and without negatively impacting the environmental quality of our natural areas (for example, no stormwater or other water quality impacts, no ecological degradation, etc.).

Our vision for 2050 is a County where our TRENDS AND CHALLENGES (p. 13) has climate change, which is an existential threat, as number **one** on the list, not number **twelve**. And where the HEALTHY AND SUSTAINABLE ENVIRONMENT section is closer to page one than the current page 94.

Our vision for 2050 is a County that has taken stronger actions to achieve sustainability. We believe that sustainability should be a prerequisite for economic growth. Even as Thrive Montgomery 2050 is a conceptual plan, actions to protect and remediate the environment such as “conduct a study” and “develop a plan” are so general as to be potentially ineffective.

Considering the urgency of climate change and other environmental issues in the County, we believe that strong actions with certain goals are necessary to achieve sustainability, even as the many details of implementing these actions will be left to the future.

Our vision for 2050 is a County that has maintained the green Wedges & Corridors structure from the current General Plan rather than being “disappeared” from the current draft document. It is stated that “Thrive Montgomery 2050 proposes to reinforce this web of centers and corridors by focusing growth around transit stations and along the major corridors.”

Where exactly are the corridors and centers? The first time that specific roads are identified as being corridors is on p.76, but it is unclear if these are all the proposed corridors

It appears that we are doomed to a County of all corridors and no Wedges. So, what happened to the green Wedges? If the wedges have disappeared, does that mean that the County completely disregarded the principles of the existing General Plan? Does this mean that, no matter what is said in the Thrive Montgomery 2050 plan, the County will disregard this plan as well? We need to go back to the Wedges & Corridors concept which more clearly delineates areas of development.

The 1993 General Plan Refinement states that, “...Wedges of open space, farmland, and lower density residential uses have been preserved.” (p. 8). Unfortunately, in spite of this sentiment, open space and lower density areas have not been preserved, and even the Agricultural Reserve is under attack by proposals, for example, for industrial solar facilities. The 1993 document further says, “The Wedge is as important today as it was 30 years ago. It permits the renewal of our air and water resources and the protection of natural habitats. It is very much the green lung of Montgomery County. ...The proximity of the Wedge to the Corridor provides a sanctuary for those who need a change from the concrete and glass of more urban settings.” (p. 9). Or, to put it a different way, the Corridor may be a place to visit or work, but we may not want to live there. The 1993 Plan also says, “The Wedge provides a low density and rural housing opportunity which adds to the diversity of land use in Montgomery County.” (p. 9).

Our vision for 2050 is a County in which the creation of wildlife and plant corridors has the same priority as development corridors. The need for safe passage for wildlife between protected areas is critical to ensuring the healthy genetic diversity of animal and plant populations to withstand the challenges of habitat fragmentation and climate

change. Residents will be encouraged to replace traditional turf lawns with conservation landscaping using native plants to support native pollinators and birds and control stormwater runoff. County codes will be revised so that residents do not get citations from a Housing Code Inspector that they are violating Chapter 58 of the Montgomery County Code by permitting weeds and grass to grow in excess of 12 inches when, in fact, they have replaced their turf grass with an area of conservation landscaping.

Our vision for 2050 is a County in which low density and rural areas in the County (those areas outside the Sewer Envelope) are afforded special protection since these areas contain watersheds which contribute drinking water to millions of people in the DC area from the WSSC Water Filtration Plants and the Little Seneca Lake emergency drinking water reservoir. Astonishingly, the County water supply is mentioned in only one paragraph (*Policy 6.2.3*) on page 101. Our drinking water sources need to be protected by new Drinking Water Special Protection Areas, downzoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, etc.

In the absence of action by EPA, we envision the County working with the state to develop health-based standards for PFAS chemicals (among the so-called “Forever Chemicals”) in water and food.”

“New testing conducted on seafood in Saint Mary’s County, Maryland and drinking water in Montgomery County reveals high levels of PFAS chemicals, according to results released today by Public Employees for Environmental Responsibility (PEER). The chemicals damage the immune system and may make consumers more vulnerable to COVID-19 and/or aggravate COVID afflictions.

PEER also tested drinking water for 36 PFAS at homes in three locations in Montgomery County: two in Bethesda and one in Poolesville. The first Bethesda site had 26.94 ppt of ten PFAS, while the second Bethesda site had 48.35 ppt of 11 PFAS. The Poolesville site had 15.4 ppt of seven different PFAS. The levels detected at the two homes in Bethesda were higher than the levels found by the Washington Suburban Sanitary Commission (WSSC), which tested drinking water for 18 PFAS at its Potomac and Patuxent Filtration Plants.” (<https://www.peer.org/more-pfas-found-in-maryland-water-and-seafood/>)

Furthermore, the residents in these rural and low-density areas that have well water need to have their groundwater supplies protected. To protect our drinking water supply, these areas should be accorded policies such as severe limitations on sewer line extensions (including closing loopholes and backdoors in the Water & Sewer Plan such

as the abutting mains policy and the Potomac peripheral sewer service policy) coupled with education for septic system owners on proper care and maintenance of their systems. Our vision for 2050 is for a County that is no longer totally negligent on this issue - to date there are no required septic inspections, no required pump-outs, and no proactive education programs.

The county is forcing our 30,000 septic system owners to go it alone until their systems fail and the County can recommend sewer line extensions as the only option.

Currently, there is little protection for well water quality in Montgomery County and the state. Our vision is that the County ask our legislators to support the Maryland Private Well Safety Program bill (once finalized).

At a high level, the Maryland Private Well Safety program will: (1) require the state to offer well owners financial and technical assistance with well water quality testing and remediation when contamination is found, (2) create an online well water quality database to give the public a better sense of the quality of our groundwater resources, (3) require disclosure of well water quality test results upon property transfer, (4) require landlords to test and disclose well water quality for tenants every three years, (5) require the state to conduct source tracking of common contaminants found in ground water and annual public reporting on the program, building transparency around the state's groundwater protection efforts.

Our vision is for the County to help fund research for new, innovative septic systems at the University of Maryland. Also, in the rural and low-density areas, our vision is for severe limitations on new road construction and road widening, and stricter requirements to control stormwater and impervious surfaces than within the sewer envelope. And our vision is that the County reaffirm its opposition to a second Potomac River crossing in western Montgomery County.

Our vision for 2050 is a County where all decisions and policies are informed by science. Decisions will be based on the fact that any amount of impervious surface degrades our water quality (as exemplified by the continuing battle for Ten Mile Creek). So-called "stream restorations" will be banned (both inside and outside of the MS4 Permit) - with some exceptions such as "daylighting" piped streams and concrete culvert removal - which convert our natural areas into engineered stormwater conveyances with no ecological uplift and without addressing the root cause of the problem - stormwater from impervious surfaces in over-developed areas. Finally, it will be acknowledged that there are better ways to protect the Bay than to trash our natural areas and parks.

Our vision is that, if stormwater runoff is mandated to be controlled outside of stream valleys, there would be no reason for stream construction work.

Our vision for 2050 is a County where the use of synthetic turf fields is prohibited.

Plastic synthetic turf is a urethane-backed carpet of colored plastic blades placed on top of a layer of rocks. The plastic contains known toxic chemicals such as heavy metals, phthalates, UV inhibitors, colorants, and flame retardants. Such carpets usually have anywhere from 30,000 to 50,000 pulverized, used tires added for cushioning impacts from falls. The tire crumb waste contains additional known toxic substances including lead, mercury, benzothiazoles, polycyclic aromatic hydrocarbons, carbon black (a known carcinogen), and volatile organic compounds like benzene.

A growing number of studies underscore the danger posed by synthetic surfaces to public health and the environment. The turf industry acknowledges that dangerous heavy metals such as lead are found in dust from playing fields. There is no safe level of lead exposure to children according to the CDC. Aside from chemical exposure, safety is a paramount concern, such as over-heating, unexpected failure of infill to cushion falls, sanitation problems (spit, snot, blood that is never cleaned from plastic carpet), and injuries such as skin abrasions and more frequent joint injury to knees and ankles.

Our vision for 2050 is a County committed to actually enforcing County codes and regulations across the board. We have witnessed an erosion of this principle. Waivers to requirements are being granted and rulings are being made in a seemingly arbitrary and capricious manner, from stormwater management waivers to conservation easement waivers, to monetary fines for forest conservation easement violations that are so low that they have no deterrent value whatsoever - a mere slap on the wrist.

While there will always be extenuating circumstances that warrant a common-sense exception, these cases should be the vanishingly small rather than the increasingly common rule that we are witnessing. Our vision for 2050 is a County where rules are enforced, not ignored by whim. Our vision is where the practice of revolving door employment is severely restricted - this happens when County employees leave to work for the companies they had been regulating.

Our vision for 2050 is a County that is finally honest about air and water quality conditions. The county must commit to honestly reporting true air quality conditions to residents. Currently, we have a single air quality monitoring station in the middle of an open field near Lake Frank surrounded by forest - not exactly where most people

breathe the air. Our vision is for a network of near-road air quality monitoring stations to accurately enable assessments of public health and to daylight equity issues.

Our vision is that Code Red days are declared if any ONE of the monitoring stations in the greater DC area goes over the trigger level, not the current, meaningless practice where Code Red days are declared by averaging all monitoring stations. Residents have a right to know if there is a health threat from a high reading at ANY monitoring station. Loudon County air might be great on a given day while the air quality in Montgomery County might be horrible on the same day - when the results are averaged, residents get the message that all is fine.

Our vision for 2050 is for emergency text, email, and radio alerts for sewer overflows similar to air quality alerts. Last year (in 2019), the WSSC sewer system spilled over 5 million gallons of raw sewage, almost 9M gallons in 2018, and over 5M gallons in 2017. So much for people who say septic systems are bad for the environment.

(ref: Wash Post: https://www.washingtonpost.com/opinions/local-opinions/a-frolic-along-the-river-could-be-good-for-your-mental-health-but-bad-for-your-physical-health/2020/10/22/20dfbb86-117e-11eb-ba42-ec6a580836ed_story.html and <https://www.wsscwater.com/customer-service/emergency-sewerwater-problems/sanitary-sewer-overflow-reports.html>)

Our vision for 2050 includes a County government that actually works to achieve a reduction in noise pollution from Reagan National Airport airplane traffic due to re-routing caused by the ill-conceived NextGen project.

Ever since the FAA changed flight patterns without a public hearing or a transition period a few years back, many of our previously peaceful neighborhoods have been subjected to low flying airplane noise to the tune of sometimes one every minute. We would like to see a return to pre-NextGen flight patterns followed by a ten-year notice of intent to change flight paths so that both home buyers and sellers can act accordingly.

Our vision for 2050 concurs with the need to concentrate density along transportation corridors to encourage the use of mass transit. However, our vision also balances any up-zoning along development corridors and centers with downzoning in other areas.

This includes the protection of our low-density and rural areas outside of the sewer envelope from creeping sewer sprawl (and resulting development pressure to increase zoning density once sewer lines are extended).

We don't envision "flexible regulations and zoning controls" and "flexible zoning initiatives". We don't have flexible speed limits for a reason. Regulations and zoning controls should be fixed, not flexible.

We appreciate this opportunity to make our comments to improve this draft Plan.

Thank-you.

West Montgomery County Citizens Association (WMCCA) Specific Comments

PREFACE (p. 6)

Is population growth a goal? The Preface states that “...we need to accommodate the projected new population growth of 200,000 people over the next 30 years.” This is presented without evidence. First of all, who is projecting this population growth, and what are the underlying assumptions for this projection? Second, the plan treats population growth as an expectation, rather than as either a desired goal or a potential problem. As written, the plan assumes we have no control over our own destiny. If it is assumed that population growth will occur, then it is reasonable to plan to limit sprawl and concentrate growth. However, what population size does the current residents of the County want? Were residents surveyed on their opinion? Would a higher population lead to a lower quality of life, regardless of where in the County they live? Rather than planning around an assumed population growth, would current residents prefer to set goals of sustainable growth including sustainable population growth, sustainable economic growth, sustainable/increased natural resources protection, and sustainable/increased quality of life?

WMCCA recommends gathering citizen input on this issue, perhaps with a county-wide survey of residents. And, of course, a survey should be crafted so as to not lead to a desired response.

“The way we think about growth needs to change.”

WMCCA Comment: We agree. The focus should be on sustainable growth, not simply growth, given that we have finite resources (both natural and economic). Instead of saying, “The way we think about growth needs to change,” which is true as far as it goes, we should make a more declarative statement such as, “We need to think in terms of sustainable growth. Sustainable growth is defined as growth that both enhances the quality of life for residents but also enhances the environmental health of our remaining natural areas.” For each “item” in the plan, is the above reflected? See the UN’s Sustainable Development Goals (https://en.wikipedia.org/wiki/Sustainable_Development_Goals)

“The Plan recognizes that our quality of life depends on the ability to attract and retain employers and the employees they need.”

WMCCA Comment: Change to read, “The Plan recognizes that our quality of life depends not only on the principle of full employment with living wages, but also on maintaining and enhancing our environment to provide clean air and water, natural areas for plant and animal life, and passive recreation.

WHY UPDATE THE GENERAL PLAN (p. 11)

“... we also are struggling to attract businesses, grappling with a legacy of racial and economic inequities, and fighting to protect the natural environment.”

WMCCA Comment: What is the evidence that we are struggling to attract businesses and why is this a problem? Simply saying that we lag behind other jurisdictions such as Fairfax in the number of businesses attracted in a given time frame does not necessarily make this a problem if the overriding concern is sustainable growth. Replace this with “...we are also seeking to attract businesses within our sustainable growth objectives, grappling with a legacy of racial and economic inequities, and fighting to protect the natural environment from the effects of overdevelopment and lack of government oversight and lax regulatory enforcement to the point of being arbitrary and capricious.” For example, the maximum fine of \$1,000 for violating a Forest Conservation Easement is nowhere high enough to be a deterrent to future violations. Another example is the liberal use of stormwater management waivers and special exemptions (zoning waivers) for businesses at the expense of residents’ quality of life considerations.

TRENDS AND CHALLENGES

1. The county is growing at a slower rate than in the past, but it will still add more than 200,000 residents in the next 25-30 years. (p. 13)

WMCCA Comment: See above comments on population. This is developer-centric view meant to scare people into believing that we must grow, grow, grow at all costs. The emphasis must be on sustainability.

2. The amount of unconstrained land available for growth is very limited.

The county must shift its focus to redevelopment and reuse of underdeveloped land, which requires a different set of public policies and approaches to growth than those that have guided the county over the past decades.

WMCCA Comment: What does “underdeveloped” land mean? As written, the implication is that it is a mistake to have lower density land because there is money to be made by overdevelopment. We disagree with that premise. The county must shift its focus from growth which benefits primarily developers to only allowing growth either 1) in those areas where more environmental damage (e.g. to stream water quality) will not be inflicted, or 2) in areas which are designated as stormwater control zones which require, for example, containment of stormwater from 100 year (or greater) storm events.

3. Over one-third of the county is used for single-family homes (detached and townhouses).

A recommendation of Thrive Montgomery is to build on the concept of focusing growth along corridors, even if this may require changes to land use and densities along these corridors.

WMCCA Comment: As written Thrive Montgomery is declaring war on single-family homes. If we follow the money, who stands to profit from this? Not the residents. To meet our objective of sustainable growth, for every up-zoned area, there should be an equal down-zoned area. The down-zoned areas should be given Transfer of Developable Rights (TDRs), similar to what happened in the Ag Reserve, that can be sold to developers in the up-zoned areas. Without a balance between up-zoning and down-zoning, the overall density in the County will continued ratcheting up.

5. The county is becoming older.

The aging population may put downward pressure on household incomes. ...An aging population, without a commensurate increase in younger workers, means lower average household incomes and changing needs for social services.

WMCCA Comment: The baby boom bubble of older people is a temporary phenomenon. Expenses such as “retirement programs for old people” may be more than offset by the lower need for public education expenses.

7. We are not producing enough housing in accessible locations to meet our needs.

While the number of housing units in Montgomery County increased 32% from 295,723 in 1990 to 390,673 in 2018, this increase was lower than the 53% increase in the region.

But we cannot continue to rely on a few, high-density Metro station areas to provide enough housing to bring down costs. We need other locations where lower land prices will support low- to medium-density residential building types.

WMCCA Comment: Why are we using the “must keep up with the Jones” mentality? We need to focus on sustainability. If you want to compare us with other parts of the region, we need to ask what has the housing increase in those regions done for their quality of life and the environment. Moving construction to areas with lower land prices has been the driver of suburban sprawl for decades.

8. Recent sluggish economic growth requires that the county strengthen its competitive advantages in the global economy.

WMCCA Comment: The emphasis should not be on job growth, but rather sustainability and quality of life. Fairfax County emphasized attracting more businesses for job growth (to “broaden the tax base”) and look at what happened. Taxes never went down, and the only ones who benefitted were landowners, realtors, and builders, not the average citizen.

9. We need to stop planning for cars and emphasize transit, walking and biking.

WMCCA Comment: We wholeheartedly agree with this.

11. Declining trends in public health and well-being indicate a growing need for a healthier more active lifestyle. ...all residents can benefit from a more active lifestyle supported by a renewed emphasis on transit, walking, and biking.

WMCCA Comment: We agree on the need to emphasize transit, walking, and biking. However, the County has done an extremely poor job of promoting safe walking and biking in the past. Especially in the lower density areas, many roads have no sidewalks or trails alongside them. Even the lack of bicycle racks at retail centers sends the message, “Bikes are not welcome here.” This is not only

a public health issue, it is a climate change issue - walking and biking to destinations means less automobile exhaust.

12. Climate change threatens all aspects of life.

We will need significant investments in upgrading our infrastructure to withstand the threats of extreme weather and other disruptions. These improvements will put extra burden on the county's financial resources.

WMCCA Comment: Upgrades to our infrastructure to handle weather conditions have been woefully inadequate for decades. Therefore, to only point the finger at climate change is highly disingenuous. Some of our stream valleys are highly degraded due to decades of inadequate stormwater control regulations - yes, this will be made worse by climate change. We expect more intense storms caused by global warming. To lessen the burden on the County's financial resources, a Thrive 2050 goal should be to enact more stringent stormwater control requirements for new build homes and home renovations (i.e., much more than the current 1 inch or so of rain in 24 hours). For the huge number of existing homes, there should be a new regulation that properties must be retrofitted to control storm water to "new build standards" upon property transfer – who pays the cost could be negotiated between buyer and seller. For commercial property, stormwater control to "new build standards" should be required upon sale. Grandfathering for commercial property should not be allowed.

A PLAN TO THRIVE

RATIONALE AND CONTEXT

"We do not have the land available for more suburban subdivisions, so we need to change how we design our communities and transportation network to accommodate new growth." (p. 32)

WMCCA Comment: Instead of "new growth", this should say "sustainable growth".

"The redevelopment of the 8.78-acre shopping center site with housing, shops, offices and open spaces reduced its stormwater runoff by 77%." (p. 34)

WMCCA Comment: This is a misleading "victory", since the Pike and Rose site before development was mostly just a large parking lot. The implication is that we

need higher density development to reduce stormwater runoff. What is needed is more stringent stormwater control regulations and elimination of waivers.

Corridors are the place for new growth

This additional density will require change in existing single-family neighborhoods through the introduction of “missing middle” housing, such as duplexes, triplexes, townhouses, live-work units and small multi-family structures in areas where a moderate degree of intensification is appropriate. (p.38)

WMCCA Comment: To ensure sustainable growth, for every up-zoned area, there should be an equivalent down-zoned area. The down-zoned areas should be given TDRs (similar to what happened in the Ag Reserve) that can be sold to developers in the up-zoned areas.

Equally useful as opportunities for connection, we must enhance and connect the growth corridors with trails in the stream valley corridors at their intersections to expand active transportation options via walking and cycling.

WMCCA Comment: Trails for bicycles should be built along all existing and planned rail and bus rapid transit (BRT) corridors. Bicycle trails should be separated with jersey-type barriers, for example, to completely shield bicycles from vehicular traffic. Trails in the stream valleys should be natural surface only so as to not add to impervious surface coverage.

What is Thrive Montgomery 2050 proposing regarding single-family zoning?

Specifically, Thrive Montgomery 2050 recommends increasing densities along corridors especially those served by transit. These densities should be commensurate with context of the surrounding areas. In some cases, this will involve increasing densities in areas that have been historically characterized by single-family housing and could include duplexes, triplexes and small multi-family buildings. (p.42)

WMCCA Comment: To meet our objective of sustainable growth, for every up-zoned area, there should be an equivalent down-zoned area. The down-zoned areas should be given TDRs (similar to what happened in the Ag Reserve) that can be sold to developers in the up-zoned areas.

Attainable housing for all income levels

Housing attainability and affordability is an economic as well as an equity issue. Unless we grow our housing supply to make room for the projected 200,000 new residents moving to the county by 2045, our existing communities will become more expensive, less diverse, and integrated, and it will be difficult to attract and retain a skilled workforce.

WMCCA Comment: See our comments above. We don't see the projection of 200,000 new residents as a fait accompli. If the housing supply is not grown, there will be no place for new residents to move into, and the county's population will not grow as projected. This is a decision for residents to make, not the authors of the General Plan or developer interests.

Evolution of single-family neighborhoods near transit

Single-family neighborhoods near employment centers and transit need to have a greater mix of housing types that provide less expensive options for our growing population and for existing residents, making our communities more affordable and equitable. This will require a comprehensive review of impediments to increasing the housing supply; a will to change current policies when necessary, such as reexamining our zoning and other controls to create a greater mix of housing types in new and existing communities; and an acceptance by all that more housing and new residents are a benefit to the county and the region.(p.43)

WMCCA Comment: To meet our objective of sustainable growth, for every up-zoned area, there should be an equal down-zoned area. The acceptance of more housing and new residents should be the decision of residents, not the authors of the General Plan or developer interests. See above comments on population growth. In addition, tax breaks (such as multi-year tax abatements) should not be given to developers - they need to pay their own way and not be subsidized by taxpayers.

THE PLAN VISION

Thrive Montgomery 2050 envisions a county that is more urban, more diverse, and more connected, providing a high quality of life for existing residents while also welcoming new residents and new ideas. (p. 46)

WMCCA Comment: The envisioning of the county being more urban should be the decision of residents, not the authors of the General Plan or developer interests.

This pattern of sustainable growth and development creates multiple benefits for Montgomery County and results in a future county that is:

- Urban.

Compact form of development, coupled with conservation of the Agricultural Reserve, has proven to be better for the environment resulting in improved stream water quality.

WMCCA Comment: This is unrealistic. With compact development comes more impervious surfaces which leads to degraded stream water quality. Unless compact (read more dense) development is balanced by down-zoning of other areas, the amount of impervious surface in the county will increase. We call for down-zoning and increased protections in the low density and rural areas outside of the sewer envelope to balance the proposed increased density areas. Plus, conservation of the Ag Reserve is already under attack with the proposal for commercial solar.

Active.

County residents enjoy an active, healthy lifestyle. Connecting to the outdoors and their neighbors boosts their physical and mental health. Every resident has walkable access to opportunities for social engagement, physical activity, and quiet contemplation, whether in parks or other public spaces. The county's built and natural resources are designed to encourage physical activity. Fewer vehicles using clean energy, have resulted in drastically reduced greenhouse gas emissions. (p. 46)

WMCCA Comment: Increased housing density will probably not lead to increased physical health. Most urbanized areas suffer from reduced air quality due to more vehicular traffic. Assuming a gradual conversion to all electric vehicles, increased urbanization will hurt the health of residents within the time span of Thrive 2050.

Inclusive.

Various housing types at a mix of price points in Complete Communities and along rail and BRT corridors accommodate diverse populations and help achieve equity and integration on a neighborhood scale. Residents have a say in how their neighborhoods look and feel. Planners engage everyone in decision making about the future of their communities. (p. 47)

WMCCA Comment: While it sounds nice to imagine that planners will engage everyone in the decision making, our experience is that sometimes this engagement is merely to check off the box of public input. In recent years, residents have their say and then planners do what they want, sometimes seeming to favoring development interests over the interests of residents. If this plan wants to give residents a say, then we suggest that residents, not the Planning Board, be allowed to vote on decisions in their communities. Alternatively, there could be equal numbers of Planning Board members and voting representatives from communities for each project.

Flexible. Residents have a variety of choices when selecting their preferred community setting and housing type. The bulk of new residents live in more dense, urban areas. Concentrating new growth in already developed areas makes the best use of the county's available land and infrastructure, and helps to protect the environment. Flexible regulations and zoning controls result in a vibrant mix of residential and commercial uses. (p. 47)

WMCCA Comment: We object to the concept of "flexible regulations and zoning controls." We don't have flexible speed limits for a reason. We don't want an officer to say, "The speed limit is 25, but I'll be flexible and make it 45 for you, Mr. Jones." Regulations and zoning controls should be fixed, not flexible. The implication is that the Planning Board can change regulations and zoning controls based on a whim or developer influence.

Competitive. The county retains and attracts large companies, small businesses, and high quality educational institutions.

WMCCA Comment: Add to this: "...only insofar as they do not negatively impact our goal of environmental sustainability and improved quality of life. This includes having no negative impact on our natural areas, including streams. We will not sacrifice water and air quality, overcrowding of roads and schools, or other indicators of quality of life simply to add jobs.

This vision respects the original 1964 "Wedges and Corridors" General Plan, with a greater emphasis on a compact form of development and the role of corridors as places to grow. It continues to protect and honor the Agricultural Reserve—a nationally recognized planning landmark that provides economic and environmental benefits. (p. 47, 48)

WMCCA Comment: See our comments on the Green Wedge at the top. The term “compact form of development” should be replaced by “higher density development” to avoid euphemisms

Figure 25: Lining corridors with appropriate densities provides housing options. (p. 48)

WMCCA Comment: The “before” image of a tree-lined street with a fully wooded forest on the right is replaced with cheek-to-jowl buildings in the computer graphic image at the bottom. While this may represent a cash cow for developers, it represents a horror show for residents whose local woodland has been clear cut. This is just another example of the developer-centric vision represented by the Thrive 2050 document in its current form.

COMPLETE COMMUNITIES

Issues and Challenges

“Zoning techniques like minimum lot size requirements in single-family neighborhoods created uniform housing, which resulted in neighborhoods defined primarily by income.” (p. 52)

WMCCA Comment: It would be more accurate to include the fact that minimum lot size requirements was used to protect drinking water supplies in some areas.

“The lack of housing diversity by unit type and size is also a significant burden for the county’s older adults. Most would continue to live in the same neighborhood where they raised their families if there were options to downsize. However, the current pattern of development forces them to continue to stay in larger houses they don’t need or move to locations away from their families and social support network.” (p. 52)

WMCCA Comment: What is the evidence to support the above statements? What is the average distance from existing homes of older adults to the closest retirement community?

“Today there are few remaining vacant properties to accommodate new growth. Approximately 85% of the county’s land area is constrained by existing development, environmental constraints and other factors, leaving only 15% of land available to accommodate growth (see Issues Report for details).”

WMCCA Comment: There is too much emphasis on the need for new growth. It is never explained why growth is good for existing residents. What kind of growth are we talking about: jobs, population, number of buildings, etc.? The emphasis should be on sustainable growth.

Action 1.1.2.a: Review and revise the zoning categories and requirements in the Montgomery County Zoning Ordinance as needed to accommodate a variety of uses and densities within Complete Communities. (p. 55)

WMCCA Comment: Add, “In conjunction with this, review and revise the zoning categories to 1) better protect our drinking water supplies in those watershed areas that feed into WSSC Water Filtration Plants and Little Seneca Lake (an emergency drinking water source) and 2) better protect rural and low-density areas outside the sewer envelope from sprawl.

Action 1.1.4.a: Further the Missing Middle Housing Study by identifying options and implementation strategies to increase the variety and density of housing types in areas zoned for single-family detached and semi-detached housing, particularly in areas located within a 15-minute walk or bike ride of rail and bus rapid transit (BRT). (p. 55)

WMCCA Comment: For every up-zoned area, there should be an equal down-zoned area. The down-zoned areas should be given Transfer of Developable Rights (TDRs), similar to what happened in the Ag Reserve, that can be sold to developers in the up-zoned areas. Without a balance between up-zoning and down-zoning, the overall density in the County will continued ratcheting up.

Policy 1.3.2: Employ the Energized Public Spaces Functional Master Plan to identify opportunities for new parks or open spaces, such as publicly owned land, property acquisition or public-private partnerships to more equitably serve communities with limited access to parks and public spaces. (p. 56)

WMCCA Comment: New Action: Move aggressively to acquire new park land through creative measures including the use of eminent domain and bond referendums (see Fairfax County). This must be done in all areas in the county, not primarily down county.

Policy 1.3.1: Ensure all people in urban and suburban communities have access to parks or public spaces that provide opportunities for vigorous physical activity, social engagement, and quiet contemplation or connections to nature within a comfortable 15-minute walk from their homes. (p. 55)

WMCCA Comment: Add: Increase access to parks by asking for (possibly in exchange for a tax credit) or purchasing (via eminent domain) public access points (i.e., short connector trails between homes from a road or sidewalk to parks. There are miles of parkland that is not easily accessible within neighborhoods because there are extremely limited access trails. Examples include both Muddy Branch and Watts Branch SVPs. Note: Muddy Branch SVP does have a few access trails between homes, but these are signed as being private. It should not be allowed to have private access trails to public parks.

Policy 3.1.1: Support the efforts of the county's economic development agencies to retain and grow existing businesses and attract new businesses. (p. 68)

WMCCA Comment: New Policy: Such efforts will not include the use of subsidies in the form, for example, of tax breaks such as multi-year tax abatements. Tax-payer subsidies of large corporations will no longer be tolerated - these enterprises need to pay their own way and not be subsidized by taxpayers. In addition, new business development will not get ahead of infrastructure and public services. New businesses will contribute funds to the roads, sidewalks, schools, fire departments, community centers, parks, etc., required to support the needs of the new residents that they employ.

Goal 3.2: Grow vibrant commercial centers that are attractive as headquarters locations for large, multinational corporations, major regional businesses, federal agencies, and small and locally owned businesses. (p. 68)

WMCCA Comment: New Policy: The County will not use tax breaks (e.g., payment in lieu of taxes, property tax exemptions, etc.) for any commercial development projects. Development must proceed on its own merits with any risks shouldered by commercial enterprises, not the public. Tax concessions to sports arenas, for example, have been shown to not return the public's initial "investment".

Action 3.2.2.a: Establish a one-seat transit service from major employment centers to at least one of the three international airports in the region (Baltimore-Washington International, Dulles International, or Reagan National Airport). (p.69)

WMCCA Comment: Use less jargon. Aren't taxis a one-seat transit service?

Policy 3.3.1: Prioritize job access and job generation in land use planning, including development review processes, master planning and functional plans. (p.69)

WMCCA Comment: No! Prioritize sustainability (e.g. carbon footprint neutrality), quality of life for existing residents, and protection/enhancement of the natural environment in land use planning, including development review processes, master planning and functional plans.

Action 3.3.1.a: Complete an Employment Growth and Access Functional Plan to determine if and where land use policies limit growth of and access to a variety of job types. Recommend strategies for addressing these limits. (p.69)

WMCCA Comment: Change to say, “Complete an Employment Growth and Access Functional Plan to determine if and where land use policies limit growth of and access to a variety of job types. Recommend strategies for addressing these limits only if they can be accomplished while maintaining sustainability (e.g. with a neutral carbon footprint), quality of life for existing residents, and the protection/enhancement of the natural environment.”

Goal 3.5: Lead nationally in innovation and entrepreneurship, building on existing assets and enhancing job and business growth for industries in which Montgomery County has a competitive advantage. (p.70)

WMCCA Comment: Add this language: This enhanced job and business growth must only be pursued on a sustainable basis, i.e., only if it can be attained without negatively impacting quality of life (e.g., air quality, traffic, happiness rating) and environmental quality of our natural areas (e.g., no stormwater or other water quality impacts, no ecological degradation, etc.).

Goal 3.6: Identify and remove regulatory and other barriers to encourage real estate development and business establishment and expansion.

WMCCA Comment: This is a dog whistle for developers. We need regulations so that we don't end looking like Tysons Corner. Add this language: These must only be removed if it can be proved that it can be done without negatively impacting quality of life (e.g., air quality, traffic, happiness rating) and environmental quality of our natural areas (e.g., no stormwater or other water quality impacts, no ecological degradation, etc.).

SAFE AND EFFICIENT TRAVEL (p. 74)

Vision for Safe and Efficient Travel (p. 74)

WMCCA Comment: Define “micromobility”.

Focus on Transit and Walkability

These existing east-west corridors include the new Purple Line and the planned BRT along Randolph Road. (p. 76)

WMCCA Comment: Remove Purple line now that construction has stopped?

For example, early conceptual planning and regulatory review stages have begun on the proposed highspeed superconducting magnetic levitation (maglev) system between Washington, DC, and Baltimore, and a proposed 35-mile underground tunnel/loop to move electric vehicles between Washington and Baltimore in 15 minutes. (p.76)

WMCCA Comment: The County needs to come out against the maglev project due to the biodiversity, value, history, research and fossils on the federal, state, academic, and city land, refuges, and parklands that almost entirely comprise the footprint for the proposed maglev corporation’s trainyards, trainlines, power stations, road realignments, powerline realignments, parking lots, and new roads.

Supporters of regional connectivity have also discussed a Purple Line extension to create suburb-to-suburb connection between Tysons in Fairfax County, VA, and Largo in Prince George’s County. (p.76)

WMCCA Comment: Change to “have also discussed a Purple Line extension, BRT, and monorail to create....”

Goals, Policies and Actions (p. 76)

WMCCA Comment: Add new Policy & Action: Encourage people to move closer to their jobs by offering government subsidies for moving expenses, based on need, for people who wish to avoid long commutes by moving closer to their job. Not only would this reduce demand for new road construction, but it would also take cars off the road. Our guess is that this would be less expensive than building/widening roads. It is a given that housing costs increase the closer-in you move. That is one of the trade-offs that someone has to make: a longer commute with a bigger house vs. a shorter commute with a smaller house or

apartment/townhouse. The reason we have suburban sprawl was (and is) the lure of less expensive/larger houses coupled with relatively cheap (arguably government subsidized) gasoline and roads. Solving congestion is not a simple problem and there are many variables in the equation. Just to throw out one variable: what if gas was taxed the way it should be (as in Europe), say phasing in a tax of \$1 or more per gallon? This would have lots of possible repercussions: people buying smaller cars, moving closer-in, switching to transit, moving to Virginia (which may not be a bad thing), etc..

Action 4.1.1.b: Update the Master Plan of Highways and Transitways to consider whether to remove master-planned but unbuilt highways and road widenings. (p. 77)

WMCCA Comment: Change to “Update the Master Plan of Highways and Transitways **to remove** master-planned but unbuilt highways and road widenings, **especially the M-83 highway.**” M-83 is unneeded, would be environmentally destructive, and takes funds away from mass transit projects.

Policy 4.1.3: Prioritize safe, connected, low-stress bicycle, and pedestrian networks in downtowns, town centers, rail and BRT corridors, and community equity emphasis areas over projects that increase traffic capacity. (p.77)

WMCCA Comment: Bicycle lanes must be separated from motor vehicle lanes by structures such as jersey walls. (See photo on p. 75)

Policy 4.1.4: Extend rail and bus rapid transit (BRT) directly to regional destinations such as Tysons and Arlington in Virginia; and Frederick, Columbia, and Downtown Baltimore in Maryland.

WMCCA Comment: Change to “Extend rail and bus rapid transit (BRT) **and possibly monorail...**”

Action 4.1.4.a: Provide dedicated transit lanes as part of the replacement of the American Legion Bridge. (p.77)

WMCCA Comment: Change to “Provide dedicated transit lanes as part of the replacement of the American Legion Bridge **as well as dedicated pedestrian and bicycle lanes so as to connect the C&O Canal NHP on the Maryland side to the Potomac Heritage Trail on the Virginia side. Pedestrian and bicycle lanes on a new bridge have been on the planning books for decades.**”

Policy 4.2.1: Expand the street grid in downtowns, town centers, rail and BRT corridors, and suburban communities to create shorter blocks, improve access and transportation system redundancy, and slow the speed of traffic. Use development projects and roadway modifications to provide new street connections. (p. 78)

WMCCA Comment: This is not a good idea. This will result in more miles of impervious roadway, leading to more stormwater runoff, leading to more degradation of stream valleys.

Action 4.2.2.a: Update the Master Plan of Highways and Transitways to limit the number of through-lanes in downtowns and town centers to a maximum of four general purpose lanes and repurpose space for transit lanes, wider sidewalks, bikeways, trees, and stormwater management. Discourage new turn lanes in downtowns and town centers.(p.78)

WMCCA Comment: Add: Bikeways must be separated from motorized vehicles by solid barriers such as jersey walls, not simply low curbs.

Policy 4.5.1: Incentivize the use of modes other than single-occupant vehicles by providing high quality transit, walking, and bicycling networks. (p.79)

WMCCA Comment: Change to: Incentivize the use of modes other than single-occupant vehicles by providing high quality transit, **and safe** walking and bicycling networks, both of which are separated from motorized vehicles by solid barriers such as jersey walls, not simply low curbs.

Policy 4.9.3: Design streetscapes to mitigate disruption from climate change, manage stormwater effectively, and provide tree canopy for shade and habitat. (p.82)

WMCCA Comment: Add: Managing stormwater effectively in streetscape designs will eliminate the need for the destructive practice of so-called “stream restorations” in stream valleys.

Build More Housing, of More Types, in More Ways

Montgomery County needs to build more housing. Declining production and increased development costs have resulted in rising housing costs and an increase in the number of cost-burdened households. Without an appropriate range of housing types at attainable price points, the county will be unable to attract and retain the employment base necessary to support our economic well being. (p.86)

WMCCA Comment: To say, “Montgomery County needs to build more housing” begs the question, “When will Montgomery County have enough housing?” The current population is now about one million people. Do we want to plan for a county where the population is 10 million or 25 million people? The current draft Plan treats population growth as an expectation, rather than either a desired goal or a potential problem. Job and business growth must only be pursued on a sustainable basis, that is, only if they can be attained without negatively impacting quality of life (including, for example, air and water quality, traffic, and yes, our happiness rating) and without negatively impacting the environmental quality of our natural areas (for example, no stormwater or other water quality impacts, no ecological degradation, etc.).

The county needs housing growth in transit accessible locations including current and planned rail and bus rapid transit corridors. Predominantly single-family detached houses currently line these transit corridors limited by zoning that only allows only this type of housing. Low to moderate density increases would allow the introduction of more housing types near transit to serve a mix of incomes and household types. (p. 86)

WMCCA Comment: Up-zoning (density increases) in these areas need to be balanced by down-zoning (density decreases) in other areas.

In order to build more housing, community-led support for and championing of new housing development is critical. This support can promote the value that new residents and housing bring to our neighborhoods. Communities have become highly adept at using the public process to block new housing and solving the county’s housing shortage will require a shared vision throughout Montgomery County. (p. 86-87)

WMCCA Comment: Rather than criticizing the right of communities to protect their quality of life (“Communities have become highly adept at using the public process to block new housing...”), and rather than criticizing the rights of residents to provide input via the public process, planners should listen to the will of the people. As the draft plan states, “Residents have a say in how their neighborhoods look and feel. Planners engage everyone in decision making about the future of their communities.” (p. 47) The county should be resident-centric rather than development-centric. Do the current 1 million residents want the county to become home to 25 million residents in the future?

Goal 5.1: Provide and produce housing units that meet the diverse household sizes and needs of all Montgomery County residents in terms of type, size, accessibility, affordability, and location. (p. 87)

WMCCA Comment: Add: “This will take place primarily through the slow conversion of existing housing units without necessarily increasing the total number of housing units.”

Action 5.1.1.a: Expand housing options in detached residential areas near high-capacity transit by modifying the zoning code to allow duplexes, triplexes, and quadruplexes, residential types by-right and with smaller lot areas.(p. 87)

WMCCA Comment: Add, “Any up-zoning must be balanced by down-zoning in other areas of the county.”

Action 5.1.2.b: Establish incentives to encourage conversion of existing high-vacancy office and retail sites into residential uses through adaptive reuse or redevelopment of the site. Create flexible zoning incentives for conversion of planned and existing office and retail sites to residential uses, including allowing properties to reallocate their non-residential Floor Area Ratio to residential use. (p.87)

WMCCA Comment: We object to the concept of “flexible regulations and zoning controls” and “flexible zoning initiatives”. We don’t have flexible speed limits for a reason. We don’t want an officer to say, “The speed limit is 25, but I’ll be flexible and make it 45 for you, Mr. Jones.” Regulations and zoning controls should be fixed, not flexible. The implication is that the Planning Board can change regulations and zoning controls based on a whim or developer influence.

Goal 5.2: Ensure that the majority of new housing is located near rail and BRT stations, employment centers and within Complete Communities that provide needed services and amenities for residents.

Policy 5.2.1: Pursue financial and zoning opportunities to increase residential density, especially for older adults and people with disabilities, near high-capacity transit that will result in increased walkability and access to amenities.(p. 89)

WMCCA Comment: Add, “Any up-zoning must be balanced by down-zoning in other areas of the county.”

HEALTHY AND SUSTAINABLE ENVIRONMENT

Issues and Challenges

Montgomery County is a leader in protecting and enhancing the natural environment through a broad range of planning initiatives, policies, and regulations to protect sensitive environmental resources. But many indicators such as stream water quality, forest loss, loss of plant and animal species, and increased imperviousness point to greater stewardship challenges. As the population expands and the region continues to develop, pressures on our natural systems increase. (p. 97)

WMCCA Comment: Change, “Montgomery County is a leader in protecting and enhancing the natural environment...” to “ **Montgomery County’s vision is to become** a leader in protecting and enhancing the natural environment....” There is no way we can claim to be a leader when, for example, we are trashing our natural areas by doing so-called “stream restorations” which convert natural (although not always pristine) areas into engineered stormwater conveyances (with some exceptions such as “daylighting” piped streams and concrete culvert removal). We are not a leader in protecting our natural environment when over-development is degrading the water quality in Little Seneca Lake, our emergency drinking water supply.

Vision for Healthy and Sustainable Environment (p. 97)

WMCCA Comment: We need a goal and policy to require returnable bottles. The Northeast has done this for decades. We need to stand up to the retail stores who have pushed back on this forever.

WMCCA Comment: We need a goal and policy that retailers can only sell products in packaging that can be recycled by the County.

WMCCA Comment: We need conservation measures to be enacted to conserve water (for example, an “excessive use” charge which would a higher charge that kicks in when the “standard” per person daily usage is exceeded – to discourage lawn watering, for example).

WMCCA Comment: We need a County-wide education program about the need to conserve water.

WMCCA Comment: We need to change the code to allow grey-water systems and composting toilets.

WMCCA Comment: We need to change how WSSC sewage overflows are reported and how the public is notified:

1) Allowing overflows under 5,000 gal to be reported only quarterly or annually is unreasonably lax. A spill of that size would potentially have disastrous health effects for people and pets in a small stream. ANY overflow where sewage has reached surface water of any category (not just the ones listed) should have to be reported "immediately". Plus, any spill where raw sewage enters any surface water is a risk to public health - this is a giant loophole where someone can do a paper and pencil justification for claiming there is no risk to public health ("It was only X gallons which would be diluted by Y factor, etc."). If you dump 1 gallon of raw sewage where a child is playing in the water, that is a public health risk.

2) The current public notification requirement is woefully inadequate. The average person does not regularly check the health department websites. The requirement for notifications "WITHIN A REASONABLE TIME" is open to abuse - it should be more like "within one hour of the event "discovery". A requirement should be added to notify all local news outlets within one hour of the "discovery" of the overflow (especially radio and TV stations - so that the information can be immediately broadcast). Plus, local governments should be required to send health notifications to subscribers of their emergency alert service (For example, see - <https://www.montgomerycountymd.gov/OEMHS/AlertMontgomery/index.html>). Sewage overflow reports should be reported as seriously and routinely as air quality alerts.

3) Another enhancement should be a requirement for more public transparency in overflow reporting. Currently, one can go to the WSSC (Washington Suburban Sanitation Commission) web site (<https://www.wsscwater.com/customer-service/emergency-sewerwater-problems/sanitary-sewer-overflow-reports.html>) and see reports of individual overflow events. However, it is next to impossible (without spending hours pouring over the data) to determine the total overflows by individual county or watershed. That level of detail is absolutely available - it can be requested and received via a spreadsheet from WSSC that can be easily sorted by the above, but this spreadsheet format should be posted to the WSSC web site, not be accessible only via special request. The spreadsheet format allows one to easily determine the cumulative volume of overflows.

WMCCA Comment: The county must get serious and honest about reporting true air quality conditions to residents. Currently, Montgomery County's has a single air quality monitoring station in the middle of an open field near Lake Frank surrounded by forest - not exactly where most people breathe the air (<https://youtu.be/FJNRY6TWmaU> & <https://montgomerycivic.org/files/CFN201803.pdf#page=4>). The county needs a network of near-road air quality monitoring stations to accurately enable assessments of public health and to daylight equity issues.

Reuse, recycling and composting of food and yard waste results in very little municipal solid waste generation. (p.97)

WMCCA Comment: With respect to reuse, county solid waste transfer stations must allow residents to remove items (such as electronics, metal items, etc.) for reuse instead of shipping it away. Home hobbyists can repair electronics, and do it yourselves can find uses for metal scraps and perfectly good metal filing cabinets, for example. This will, presumably, require signing of liability waivers, but this is already routinely done at Parks events.

Urbanism as Key to True Sustainability

Montgomery County has been a pioneer in protecting and preserving its natural environment.(p.97)

WMCCA Comment: Change to, "Montgomery County **strives to be a leader** in protecting and preserving its natural environment." Again, there is no way we can claim to be a pioneer or leader when we are trashing our natural areas by doing so-called "stream restorations" which convert natural (although not always pristine) areas into engineered stormwater conveyances (with some exceptions such as "daylighting" piped streams and concrete culvert removal).

Together, these two land uses and numerous regulatory mechanisms and policy initiatives have put the county in the forefront of environmental protection in the country. (p.97)

WMCCA Comment: Much as we would like, this statement is demonstrably false. Again, there is no way we can claim to be in the forefront of environmental protection in the country when we are trashing our natural areas by doing so-called "stream restorations" which convert natural (although not always pristine) areas into engineered stormwater conveyances (with some exceptions such as "daylighting" piped streams and concrete culvert removal).

Policy 6.2.3: Upgrade the county's water supply and distribution systems to withstand the effects of climate change and continue to meet the county's current and long-term needs for safe and adequate drinking water supply. (p. 101)

WMCCA Comment: Our vision for 2050 is a County in which low density and rural areas in the County (those areas outside the Sewer Envelope) are afforded special protection since these areas contain watersheds which contribute drinking water to millions of people in the DC area from the WSSC Water Filtration Plants and the Little Seneca Lake emergency drinking water reservoir. Astonishingly, the County water supply is mentioned in only one paragraph (*Policy 6.2.3*) on page 101. Our drinking water sources need to be protected by new Drinking Water Special Protection Areas, downzoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, etc.

In the absence of action by EPA, we envision the County working with the state to develop health-based standards for PFAS chemicals (among the so-called "Forever Chemicals") in water and food."

"New testing conducted on seafood in Saint Mary's County, Maryland and drinking water in Montgomery County reveals high levels of PFAS chemicals, according to results released today by Public Employees for Environmental Responsibility (PEER). The chemicals damage the immune system and may make consumers more vulnerable to COVID-19 and/or aggravate COVID afflictions.

PEER also tested drinking water for 36 PFAS at homes in three locations in Montgomery County: two in Bethesda and one in Poolesville. The first Bethesda site had 26.94 ppt of ten PFAS, while the second Bethesda site had 48.35 ppt of 11 PFAS. The Poolesville site had 15.4 ppt of seven different PFAS. The levels detected at the two homes in Bethesda were higher than the levels found by the Washington Suburban Sanitary Commission (WSSC), which tested drinking water for 18 PFAS at its Potomac and Patuxent Filtration Plants."

[\(https://www.peer.org/more-pfas-found-in-maryland-water-and-seafood/\)](https://www.peer.org/more-pfas-found-in-maryland-water-and-seafood/)

Furthermore, the residents in the rural and low-density areas that have well water need to have their groundwater supplies protected. To protect our drinking water supply, these areas should be accorded policies such as severe limitations on sewer line extensions (including closing loopholes and backdoors in the Water &

Sewer Plan such as the abutting mains policy and the Potomac peripheral sewer service policy) coupled with education for septic system owners on proper care and maintenance of their systems. Our vision for 2050 is for a County that is no longer totally negligent on this issue - to date there are no required septic inspections, no required pump-outs, and no proactive education programs.

The county is forcing our 30,000 septic system owners to go it alone until their systems fail and the County can recommend sewer line extensions as the only option.

Currently, there is little protection for well water quality in Montgomery County and the state. Our vision is that the County ask our legislators to support the Maryland Private Well Safety Program bill (once finalized).

At a high level, the Maryland Private Well Safety program will: (1) require the state to offer well owners financial and technical assistance with well water quality testing and remediation when contamination is found, (2) create an online well water quality database to give the public a better sense of the quality of our groundwater resources, (3) require disclosure of well water quality test results upon property transfer, (4) require landlords to test and disclose well water quality for tenants every three years, (5) require the state to conduct source tracking of common contaminants found in ground water and annual public reporting on the program, building transparency around the state's groundwater protection efforts.

Goal 6.3: Improve health and well-being for all Montgomery County residents and address the health disparities that currently exist.

Policy 6.3.5: Promote active and healthy lifestyles and active transportation including walking and biking for all segments of the population in all parts of the county, by maintaining and improving built and natural environments. Ensure that all county residents in urban and suburban communities have access to a park or open space within walking distance from their homes. Enhance and protect our park system of natural and built elements to promote and increase opportunities for healthy active lifestyles and physical fitness. Foster human-to-human and human-to-nature connections. (p. 102)

WMCCA Comment: Add: Increase access to parks by asking for (possibly in exchange for a tax credit) or purchasing (via eminent domain) public access points (i.e., short connector trails between homes from a road or sidewalk to

parks. There are miles of parkland that is not easily accessible within neighborhoods because there are extremely limited access trails. Examples include both Muddy Branch and Watts Branch SVPs.

WMCCA Comment: Add: One way the County will protect our park system of natural elements is to ban so-called “stream restorations” which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances (with some exceptions such as “daylighting” piped streams and concrete culvert removal).

Policy 6.3.7: Achieve nighttime light levels near natural areas that protect wildlife and enhance our ability to enjoy the night sky. (p. 102)

WMCCA Comment: Change to read, “Achieve nighttime light levels near natural areas **and residential areas....**”

Goal 6.5: Preserve, restore, enhance, expand, and sustainably manage natural and other green areas to support human life and a diversity of animal and plant life. Provide appropriate and accessible outdoor recreation opportunities for all. (p. 103)

WMCCA Comment: New Action: Create private–public partnerships to align the profit motives of individuals to the environmental sustainability of the County.

Policy 6.5.1: Minimize imperviousness by limiting and removing unnecessary impervious surfaces while respecting goals, needs, and conditions in different parts of the county. (p. 103)

WMCCA Comment: New Action: Prioritize limiting and removal of unnecessary impervious surfaces to achieve related goals, especially for MS4 permits.

Policy 6.5.2: Protect, enhance, and increase the coverage, connectivity, and health of natural habitats such as forests, non-forest tree canopy, wetlands, and meadows through land acquisition, easements, habitat restoration, and ecosystem management. (p. 103)

WMCCA Comment: Add: One way the county will accomplish this is by banning so-called “stream restorations” which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.

WMCCA Comment: New Action: Perform educational outreach and provide incentives to cultivate private land by sustainable methods including organic lawns, native plants, meadow restoration, and zero-emission electric tools.

WMCCA Comment: The need for safe passage for wildlife between protected areas is critical to ensuring the healthy genetic diversity of animal and plant populations to withstand the challenges of habitat fragmentation and climate change. Residents will be encouraged to replace traditional turf lawns with conservation landscaping using native plants to support native pollinators and birds and control stormwater runoff. County codes will be revised so that residents do not get citations from a Housing Code Inspector that they are violating Chapter 58 of the Montgomery County Code by permitting weeds and grass to grow in excess of 12 inches when, in fact, they have replaced their turf grass with an area of conservation landscaping.

Action 6.5.2.a: Conduct a study to identify forests and other natural areas with high value for climate mitigation, resilience, and biological diversity. Establish appropriate forest and non-forest canopy goals and strategies to protect plant and wildlife diversity and human health.

Action 6.5.2.b: Conduct a study of the Special Protection Area (SPA) program law, regulations and implementation and determine what changes are needed to achieve the original SPA program goals and objectives.

WMCCA Comment: Our drinking water sources need to be protected by new Drinking Water Special Protection Areas that may include down-zoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, lower impervious surface caps, greater stormwater management requirements, etc.

Action 6.5.2.c: Study the County Forest Conservation Law and regulations intended to preserve specimen and champion trees. Identify improvements to the law and regulation's effectiveness and efficiency, including guidelines of native trees for inclusion in development and natural area protection projects that are resilient to climate change and support native wildlife, including pollinators.

WMCCA Comment: New Action: Perform outreach and develop incentives to conserve forests on private lands. Increase accountability and penalties for violations.

Action 6.5.2.d: Develop a long-range forest quality management plan to address fragmentation, deer pressure, invasive threats, and the forest's capacity to withstand and mitigate climate impacts.

WMCA Comment: New Action: Create a million-tree initiative for Montgomery County. Plant 1,000,000 native trees on public and private lands by 2030.

Policy 6.5.3: Design and construct transportation and other infrastructure improvements using environmentally sensitive methods.

Policy 6.5.4: Preserve and enhance privately owned forest land through incentives and other approaches such as easements, forest mitigation bank programs, or transfer of development rights.

WMCCA Comment: New Action: Perform educational outreach and develop incentives for partial and total conservation easements on private forest land.

WMCCA Comment: New Action: Develop incentives to cultivate native trees that are robust to climate change on private forest land.

Policy 6.5.5: Reduce and manage invasive and other problem species to levels that pose no significant threats to green areas.

WMCCA Comment: New Action: Perform educational outreach and develop incentives to reduce invasive and other problem species to insignificant levels by 2030.

Policy 6.5.6: Protect watersheds and aquifers and improve water quality and stream conditions through enhancements and retrofits such as green streets, increased tree canopy, and green stormwater management.

WMCCA Comment: Add: One way the county will protect streams is by banning so-called "stream restorations" which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.

WMCCA Comment: New Action: Create a County–State partnership to improve the integration of wetlands management and enforcement into County operations.

WMCCA Comment: Actively work with WSSC to propose and implement watershed protection plans for those watersheds that feed into WSSC Water Filtration Plants (for example, as an alternative to the previously proposed mid-Potomac River intake extension). This will NOT include so-called “stream restorations” which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.

Action 6.5.6.a: Develop incentives for developers to restore existing streams and daylight piped streams during the redevelopment process.

WMCCA Comment: No, no, no. Reword to say, “Develop incentives for developers to daylight piped and cement culvert-bound streams during the redevelopment process.” Other than that, most so-called “stream restorations” convert sections of natural stream valleys into artificial, engineered stormwater conveyances

END OF WMCCA COMMENTS

From: [Jane Lyons](#)
To: [MCP-Chair](#)
Cc: [Patterson, Tina](#); [Cichy, Gerald](#); [Thrive2050](#); [Fani-Gonzalez, Natali](#); [Anderson, Casey](#); [Verma, Partap](#); [councilmember.riemer@montgomerycountymd.gov](#); [Councilmember.Jawando@montgomerycountymd.gov](#); [Friedson's Office, Councilmember](#)
Subject: CSG Testimony on Thrive Montgomery 2050 Planning Staff Draft
Date: Wednesday, November 18, 2020 11:48:38 AM
Attachments: [2020.11.18 CSG Testimony on Planning Staff Draft Thrive 2050 - Full Unabridged - Final.pdf](#)

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

Good morning,

Please see attached for the Coalition for Smarter Growth's testimony on the Planning staff draft of Thrive Montgomery 2050, for submission to the official record.

Thank you,
Jane

--

Jane Lyons (she/her) | Maryland Advocacy Manager
Coalition for Smarter Growth
P.O. Box 73282, 2000 14th St NW
Washington, DC 20009
(410) 474-0741 | jane@smartergrowth.net
Your gift helps keep CSG's advocacy going! [Donate today!](#)

November 18, 2020

Montgomery County Planning Board
2425 Reedy Dr, 14th Floor
Wheaton, MD 20902

Item 7 - Thrive Montgomery 2050 (Support)

Testimony for November 19, 2020

Jane Lyons, Maryland Advocacy Manager

Thank you, Chair Anderson and Planning Commissioners. My name is Jane Lyons and I'm testifying on behalf of the Coalition for Smarter Growth, the leading organization advocating for walkable, inclusive, transit-oriented communities as the most sustainable and equitable way for the DC region to grow and provide opportunities for all.

We strongly support the draft of Thrive Montgomery 2050, although we believe it can be made even better. Generally, Thrive creates a vision for a county that is more affordable, walkable, prosperous, resilient, and racially and economically integrated, and recognizes that the best way to achieve that vision is through embracing the principles of inclusive smart growth, urbanism, and equitable transit-oriented development.

We would like to highlight the following five points as our major recommendations for the draft:

1. Rethink single family zoning, not just around transit: We need to allow and encourage a range of housing types in neighborhoods near transit. However, we should not limit zoning reform to these areas. This has the potential to spark opposition to new transit, if single family homeowners know that new transit goes hand in hand with zoning reform. This also has the potential to leave out areas of the county that are predominantly white and high income — the kinds of places that are still exclusive today due to racist policies of the past, which will not be undone without intentional planning otherwise. While our priority for growth should be near high-capacity transit, we must include other measures to diversify housing options in other neighborhoods while also extending transit.

From the beginning, Euclidean zoning laws have perpetuated racial and economic segregation by separating housing of different types and thus different price points. This was further exacerbated by redlining and other racist lending practices, as well as restrictive covenants, but exclusively allowing single-family homes in certain neighborhoods still keeps communities exclusive today. Where you live affects your job prospects, education, health outcomes, access to healthy food, and so much more — it shouldn't. At the same time, we know from examples around our region that neighborhoods with a great diversity of housing types, and with a diversity of people and activity, are today some of the most in demand and successful today.

2. Provide a map to guide future growth: A map similar to the map from the 1993 general plan refinement will help residents and decision makers understand where growth should be directed, identifying the centers and web of corridors discussed in Thrive. We also urge you to bring MARC stations into the discussion about where to focus growth.

3. Reduce redundancies: This is a document that reads as if it were written by committee, and it was. This includes redundancies in arguments that could be improved by reorganization and inconsistencies in writing's voice. Tightening up language will also open up space to include more data visualizations that support the arguments made. Additionally, many goals and policies are almost repeated word-for-word in different chapters. Because so many of the policies and actions are interconnected, we suggest moving these to their own appendix that is not constrained by the plan's chapters.

4. Emphasize racial justice: We commend including the section about the history of redlining and other discriminatory housing practices. However, we believe the plan can better tell the story of segregation, identifying both past mistakes and successes so that we can better identify solutions for the future. Therefore, we also believe the goal of integration could be woven into the plan's vision and goals more.

5. Create implementation metrics now: We should not wait until two years have passed after the completion of Thrive to establish metrics for measuring the plan's success. Our itemized comments below offer recommendations for high-level metrics.

Further, we recommend the following itemized changes:

1. Preface

- a. We urge you to remove the phrase “stable residential neighborhoods.” This language goes against one of the main arguments of the plan — that neighborhoods near transit need to evolve to include a range of housing types. By qualifying certain neighborhoods as “residential,” this implies that urban hubs are not residential areas.
- b. We urge you to change “we need to accommodate the projected new population growth of 200,000 people over the next 30 years” to “we need to welcome at least 200,000 people over the next 30 years.” Montgomery needs to welcome as many new residents as possible near transit and jobs in order to jumpstart the economy and meet climate goals. Montgomery is uniquely positioned to help meet state and regional climate goals given its existing transit infrastructure, job centers, and proximity to DC. Given our values of diversity and inclusion, Montgomery is also well positioned to be a national leader in sustainable growth that is equitable, breaking down traditional barriers to racial and economic integration.

2. Introduction: No comments

3. Planning Context

- a. Page 13, Trend 1. It should be explained why the first identified trend (adding 200,000 residents over the next 25-30 years) is happening, as well as make the argument for why it is good for our economy and climate goals that this trend is happening in Montgomery County.
- b. Page 23, Trend 12. It would be helpful to identify which climate change impacts Montgomery County is projected to be the most at-risk for.
- c. Additional planning contexts and challenges should include: 1) Montgomery County's racial and economic segregation and 2) Montgomery County's greenhouse gas emissions by sector, and how both of these trends have changed over time.

4. A Plan to Thrive

- a. Page 32. "The goal is to create Complete Communities that are diverse and can provide most essential services within a 15-minute walk, bike ride, or drive." We urge you to remove driving from this definition of 15-minute living. The vast majority of county residents already live a 15-minute drive from their daily needs, rendering the Complete Communities a meaningless argument for embracing a more compact, mixed use, sustainable built environment. Moreover, the worldwide concept of the 15-minute neighborhood is specifically focused on walking and biking.
- b. Page 32-34. In general, the concept of Complete Communities needs more work. There is no standard definition and no explanation of how 15-minute living will be different in urban, suburban, and rural communities. There are certain critical amenities that are not mentioned, such as healthy food. We also believe it should be explicitly stated that no community is "complete" unless it is racially and economically diverse. There should be no enclaves of whiteness, wealth, or poverty in Montgomery County.
- c. Page 37. "This additional density will require change in existing single-family neighborhoods through the introduction of 'missing middle' housing, such as duplexes, triplexes, townhouses, live-work units and small multi-family structures in areas where a moderate degree of intensification is appropriate." In addition to small multi-family structures, this section should also identify mid-rise multi-family structures as desirable along major transit corridors and high-capacity transit centers.
- d. Page 43, Racial Justice and Equity. This section should make the case that racial and economic integration is the best way to promote social mobility, achieve equitable outcomes, and shared prosperity.
- e. Page 45, Affordable. We urge you to change "housing closer to workplaces" to "housing closer to job centers, amenities, and other destinations."
- f. Page 46, Safe. This section should establish the vision that safety is enjoyed more equally by all; whereas currently, safety is experienced unequally by people of color, women, the elderly, people with disabilities, and people with non-conforming gender identities or expressions.

- g. Page 46, Inclusive. “Residents have a say in how their neighborhoods look and feel.” While this is true, residents having the loudest voice in how their neighborhoods look and feel is what led to segregation and our housing shortage. Thrive needs to grapple with how to take residents’ concerns into consideration while also ensuring broader public involvement and pursuing the greater public good.
 - h. Page 46, Resilient. “Our actions reduce greenhouse gas emissions and air and water pollution.” We suggest this be changed to read: “Our action eliminated greenhouse gas emissions and minimized air and water pollution.”
 - i. Page 46, Competitive. “We embrace the cultural, racial/ethnic, and linguistic diversity of our community as a competitive advantage, particularly in attracting employers recruiting staff who want to live and work in a diverse community.” While diversity is certainly a strength, it should not be the primary edge to our economic competitiveness.
 - j. Page 47. “We will need to make tradeoffs that may not be easy.” We urge you not to use language posing change as requiring tradeoffs. It is possible to make changes that grow the pie and result in a higher quality of life for all.
- 5. Plan Elements:** No comments
- 6. Complete Communities**
- a. Page 53, Policy 1.1.1. “Every resident should have the opportunity to live, work, play, exercise, shop, learn, and make up of public amenities and services within a 15-minute walk or bike ride.” This is contrary to the statement made about Complete Communities on page 32, which included driving. We prefer this definition.
 - b. Page 54, Policy 1.1.3. In addition to walking and bicycling, buses should also be considered the highest priority modes of transportation.
 - c. Page 54, Policy 1.1.5. Additional actions are required to ensure the co-location of essential services.
- 7. Connectedness**
- a. We encourage you to include goals, policies, and actions to actively pursue creating more public spaces, especially public meeting and event spaces. Additionally, we urge you to include actions for creating shared identity through signage, wayfinding, and other public communications, including to reflect the diversity of languages spoken in Montgomery County.
- 8. Diverse Economies**
- a. This chapter needs more about protecting and encouraging small businesses, as well as allowing and supporting neighborhood retail.
 - b. Page 65. “...increasing traffic congestion negatively affect economic activity.” We urge you to change this to “...high travel times negatively affect economic activity.” Traffic congestion does not necessarily correspond with high travel times, given destinations are located in relatively close proximity. In fact, traffic congestion in

walkable urban places is actually a reflection of a successful, vibrant urban economy.

- c. Page 66, Diversity. “Montgomery County already has several competitive industries such as biotechnology and the federal government, but it must cultivate new ones to ensure that its portfolio remains competitive.” We disagree with this approach to economic development. The county’s energy is better spent cultivating existing major industries and closely related industries, rather than trying to cultivate new industries. The positive spillover effect of having several large successful industries will result in a more diversified economy.
- d. Page 66-67, Connectedness. This section should make the argument that urbanism and a high-quality transportation system results in improved “connectedness” or agglomeration economies.

9. Safe and Efficient Travel

- a. This chapter still does not mention demand management policies, promoting pilot projects, or the importance of frequent transit — all of which are critical to achieve the outlined vision.
- b. Page 74. “We simply cannot be equitable, address climate change, and support a strong economy by building more roads.” We suggest replacing “roads” with “highways.” Building new roads should be permissible in cases where they improve connectivity of street grids.
- c. Page 76, Action 4.1.4.a. “Provide dedicated transit lanes as part of the replacements of the American Legion Bridge.” In accordance with the County Council’s most recent position, this action should also include engineering the new American Legion Bridge to be able to accommodate heavy rail.

10. Affordability and Attainability

- a. This chapter would generally benefit from stronger “both/and” messaging around market rate and subsidized housing, rather than “either/or.” Subsidized housing is incredibly important in order to make sure Montgomery’s neighborhoods are affordable for households of all incomes, including the lowest income households. Montgomery County cannot just keep doing what it has been doing — considering housing a right means that we need to think more boldly and go beyond existing programs.
- b. Page 83-84, Issues and Challenges. Montgomery needs to start thinking about housing supply and demand in submarkets rather than as Montgomery as a whole. An oversupply of moderately priced housing in Damascus doesn’t solve housing demand in Silver Spring.
- c. Page 84-85, Vision. We urge you to more explicitly include racial and economic integration.
- d. Page 85-86, Build More Housing, of More Types, in More Ways. “In order to build more housing, community-led support for and championing of new housing development is critical.” Community support is important for all issues addressed in Thrive. What should be highlighted is how many community members use the

current planning process to block new housing or zoning changes. How can the county lead a paradigm shift on this?

- e. Page 86, Policy 5.1.1. “Encourage the production of a broad variety of housing types to achieve attainable price ranges.” The actions associated with this policy should not only address breaking down zoning barriers, but also other land use regulations that make middle housing types difficult to build.
- f. Page 86, Action 5.1.1.a. We urge you to include “small apartment buildings,” in addition to “duplexes, triplexes, and quadruplexes.”
- g. Page 89, Goal 5.3. “Continue to promote the policy of mixed-income housing development through the implementation of county policies, programs, regulations, and other tools and incentives.” This goal’s associated policies and actions are too reliant on the moderately priced dwelling unit (MPDU) program. Montgomery County needs a strategic, targeted approach to intentionally create mixed-income neighborhoods, of which the MPDU program should only be one part.
- h. Page 90, Goal 5.5. “Minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults.” This goal should include rent stabilization and just cause eviction in the associated policies and actions.
- i. Page 93, Goal 5.6. “Expand housing access through elimination of fair housing barriers and enforcement of fair housing laws to protect residents from discrimination.” This goal should include a right to legal counsel for people facing eviction in the associated policies and actions.

11. Healthy and Sustainable Environment

- a. We would like to see more integration with the county’s upcoming Climate Action and Resilience Plan; more about creating capacity in the electric grid and green buildings; strategies to attack food deserts; siting renewable energy with parking lots, and commercial and industrial rooftops preferred; and planting more street trees to build the urban canopy.
- b. Page 101, Goal 6.4. “Provide all residents with safe, convenient access to affordable, healthy food.” Creating mixed-income communities should be considered a key strategy for eliminating food deserts and providing access to healthy foods.

12. Diverse and Adaptable Growth

- a. This chapter, placed toward the end of the plan, doesn’t add much that hasn’t already been said. We believe it would be most beneficial for this section to focus on the policies that support diverse and adaptable growth — including the county’s tax regime, review/permitting processes, and adequate public facilities ordinance — in addition to the Agricultural Reserve. Moreover, most of this chapter is focused on the Agricultural Reserve without making a strong argument about how it should be used in the future. How can the Agriculture Reserve best help us meet our environmental, health, land use, economic, and food production goals, and balance those interests?

13. Culture and Design

- a. Page 117, Policy 8.2.1. “Make design excellence a priority, even when cost saving measures are considered.” We strongly disagree with this prioritization of values. Affordability and sustainability should be prioritized before subjective design considerations.
- b. Page 123, Action 8.5.6.c. “Amend the Zoning Ordinance to make public art a prerequisite of receiving incentive density within the Commercial/Residential and Employment Zones.” Density, given its core importance in achieving the county’s vision of future growth, should not be held as a bargaining chip for public art.

14. Implementation

- a. Page 126-128, Tools to Implement the General Plan. The county’s adequate public facilities ordinance, the Growth and Infrastructure Policy, should be listed here.
- b. Page 129-130, Performance Measures. “The Plan recommends developing baseline performance measures as a Montgomery Planning work program item within two years of Plan adoption.” We strongly disagree with this. What gets measured gets done, and Montgomery County cannot wait for two years to get started on Thrive’s implementation. Therefore, we encourage you to create baseline performance measures in the next draft of Thrive. In our testimony on the draft vision, goals, policies, and actions, we recommended emphasizing the following when selecting metrics:
 - i. life outcomes of residents — the Montgomery of 2050 should not be a place where income, race, ethnicity, gender identity, or zip code are determinative of health, wealth, or educational outcomes;
 - ii. vehicle miles traveled and average residential distance from high-frequency transit;
 - iii. greenhouse gas and carbon emissions, by sector; and
 - iv. integration — whether our neighborhoods and communities include residents of different incomes, races, ethnicities, ages, etc.

Thank you for your consideration.

From: [Sanjida Rangwala](#)
To: [MCP-Chair](#)
Subject: Testimony on Thrive 2050 General Plan
Date: Wednesday, November 18, 2020 11:54:38 AM

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

Dear Montgomery County Planning Board,

Below are my prepared remarks for the meeting tomorrow:

My name is Sanjida and I'm testifying for myself as a resident of the Four Corners area of Silver Spring. Thank you for this opportunity to share my thoughts about the Thrive 2050 general plan. I had the opportunity to read over the draft plan earlier this fall. I am fully in support of the general principles outlined in the document. In particular, I approve of the idea of people-centred planning and building communities that are diverse, equitable, mixed-income, environmentally sustainable and socially and economically robust.

In this testimony, I want to take this opportunity to stress the importance of building neighborhoods with a variety and bounty of housing at all price points.

I bought a tiny little old house just outside the beltway in Silver Spring 6 years ago. If Zillow and Redfin are to be believed, in 6 years, my house has appreciated about 100,000 dollars, or about 30%. When I bought my house, I was a single and in my 30s making about the area median income. If I was that same person now, I would be stretched to be able to afford this house. I'd have to look somewhere further away, somewhere with worse transit and less walkable than my neighborhood.

A lot of people have this story, but mine happened in just 6 years. And there aren't many houses like mine available anymore in the county. Where lots are open for redevelopment, and a duplex or triplex could fit, I see larger and less affordable single family homes. All this is to say what many of you and us listening already know - there is an affordable housing crisis in this county.

I was reading through the Thrive Montgomery Plan and this section jumped out:

What is Thrive Montgomery 2050 proposing regarding single-family zoning? ... Thrive Montgomery 2050 proposes to increase the production of different types of housing near transit, including in existing singlefamily zones. This is an important step toward addressing past inequities in housing choice, while also creating more options for affordable and attainable housing. Specifically, Thrive Montgomery 2050

recommends increasing densities along corridors especially those served by transit...

I was very happy to read this. But I want to encourage further boldness. We should not merely be recommending duplexes and triplexes - that is, more affordable so-called missing middle housing - close to existing transit. Instead, the general plan needs to be clear that in the future, all communities in Montgomery County are going to be complete communities. I want to see everyone living in a neighborhood where they can get to all their household needs, including mass transit, by foot or bike safely within 15 min.

So I would suggest that right now in 2020, where we have existing housing, but not transit or shopping, we need to be making a plan to build transit and encouraging walkable retail. And where we have existing shopping, workplaces, and transit, we need to be building more housing. Where we are allowing housing to be built at all on a lot or parcel, it should be legal to build a duplex or fourplex by right. This is so as to ensure that we are building sustainable, complete communities everywhere we would allow construction to occur in the county.

Don't get me wrong, we absolutely should not be prohibiting the building of single family home. I like living in a single family home. A developer should be allowed to build one. But there is nowhere in the county where we should say that only single family homes are permitted to be built. That way lies the path to segregation, inequities, and housing shortages.

In short, in order to grow toward a sustainable, equitable, affordable future, we must make room for people of all incomes and means to live in existing communities - all our existing communities. When revising the general plan, please make sure that you are mapping out a future where housing is a right, and is legal everywhere.

Thank you,

Sanjida Rangwala
711 Dryden Street
Silver Spring, 20901

From: [Quentin Remein](#)
To: [MCP-Chair](#); [Anderson, Casey](#)
Subject: Subject: Comments for Thrive Montgomery 2050 Public Hearing November 19, 2020 Item #7
Date: Wednesday, November 18, 2020 11:58:12 AM
Attachments: [Comments to Planning board on 20201119.docx](#)

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

Chair Casey Anderson
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Please consider the following comments for Thrive Montgomery 2050 Public Hearing November 19, 2020 Item #7

Thank you,
Quentin Remein, President, Cloverly Civic Association.
201 Bryants Nursery Road, Silver Spring, Maryland 20905 Phone 301 421-1152

Cloverly Civic Association

PO Box 233, Spencerville, MD 20968

November 18, 2020

Chair Casey Anderson
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Subject: Comments for Thrive Montgomery 2050 Public Hearing November 19, 2020 Item #7

The Cloverly Civic Association recommends that the Thrive Montgomery 2050 Master Plan is not ready and more review is required before the document goes forward. At least a year or more of review and discussions are required. Much of this delay is due to Covid. While the Planning Board has moved ahead, residents are coping with major disruptions to their lives and do not have the time to devote to participate fully in the review and comment on this new master plan. This master plan is proposing major changes that will have great impacts on our lives, and in the present form, the Plan is not acceptable to our membership. In the October meeting of the Planning Board, Board members had major changes that needed to be made to the document. They voted to continue the public hearing with the current version and make these changes in January 2021. Don't the resident of Montgomery County deserve the opportunity to review these changes before the Plan moves on to the County Council?

The Cloverly Civic Association members have observed the Planning Board meeting on Thrive Montgomery 2050, read the plan, and held two meetings on the plan. Some of the comments from our members that were agreed to are included in the attached summary. Thank you for the staff and board's work on the plan and we look forward to participating in the development of the Thrive Montgomery 2050 Master Plan.

Specific comments are attached.

Sincerely,
Quentin Remein, President, Cloverly Civic Association.
201 Bryants Nursery Road
Silver Spring, Maryland 20905
Phone 301 421-1152
Email: cloverly@verizon.net

Cloverly Civic Comments on Thrive Montgomery Master Plan November 16, 2020

Comments are listed based on the PowerPoint used on October 1 to brief the Planning Board. The original document is not numbered. Listing shows page and topic, major points. *Cloverly Civic Association comments are in italics.*

1. Thrive Montgomery 2050 title page

The name of the plan is confusing – people do not understand that this is a new Master Plan

- 2. Today's presentation**
- 3. What is a General Plan?**

The last major revision to the master plan was in 1964 and there were eight public hearings. Most residents have not experienced a master plan revision in their lifetime and do not even understand the significance of a General Master Plan.

- 4. Previous General Plan policies shifted priority from East County corridors - focus on I-270**

Unfortunately, the County has been overtaken by decisions that have resulted in urban sprawl.

- 5. Montgomery County's Plan for Growth: Wedges and Corridors**

The general master plan and Cloverly Master Plan have served the residents well.

- 6. Policy Outcomes of Previous General Plans**
- 7. The geography of race and income are aligned**

This chart is not understood since it just shows median income, but no racial data.

- 8. Racial/ethnic and income disparities are reflected in the educational system**
- 9. Our current development pattern needs to evolve**

Can a development plan create desirable places or make us economically resilient?

Probably not!

- 10. We need to accommodate 200,000+ people in a mature, built-out county**

Why should we be growing the County at all? Build it better! Our schools need improvement, the public transportation system needs improvement, there are a lot of vacant buildings in the county, improvement of aging utility systems, etc. Much of the unconstrained area is land that is not buildable. Have you considered a Net Zero Growth Option?

11. Changes in current land-use patterns are needed to allow for infill and redevelopment

Why is infill required? Why expand urban sprawl?

12. The percentage of householders living alone have increased from 7% in 1960 to 25% in 2018

13. New single-family homes are getting larger

14. ...while new rental units are smaller

15. So What Should We Do About it?

16. Redevelopment is an opportunity & the currency to improve infrastructure & quality

17. We need redevelopment to transform... this into this

18. We need redevelopment to transform ...this into this

19. Compact development is more sustainable than sprawl

The development changes have already been done under the existing Master Plan.

20. Specific Thrive Montgomery ideas

Thrive Montgomery 2050 = more urban, more diverse, and more interconnected.

Growing while achieving three major outcomes—economies health, equity, and environmental resilience—requires refining our planning framework, not abandoning it.

Principles of smart urbanism—a compact form, a mix and diversity of uses, walkability, active and healthy lifestyles, and a focus on good design—are the future.

Why is more urban and growth needed? Why can't this be done under the current plan?

21. Corridors—the best option for infill & redevelopment

Why congest corridors with urban growth?

22. Plan for people instead of cars

Restricting the use of cars only makes life more difficult. People need more routes to work than can be efficiently provided by public transportation. Tradesmen need to use vehicles to

get to job sites and parking to do their jobs. Families need cars to transport children to schools and after school sports and other activities. Planning for people involves planning for cars needed by people for shopping, visiting friends and loved ones, and attending churches and other activities.

23. Produce more housing and different kinds of housing

The current master plan provides all these types of housing

24. Complete Communities will provide services & amenities close to home

Complete communities are a choice people can make under the existing master plan. If more complete communities are required, the marketplace can provide for them by the redevelopment of communities. People make choices to residential areas based on their own choices. Most retail/services are now available for delivery, so people do not even have to live near them. They can choose the type of exercise and play that they choose rather than being forced to accept walking and bike riding.

25. Complete Communities provide gathering places, parks, and needed facilities closer to home

Again people can make their own choices for places for social gathering rather than being restrained by what is in their neighborhood.

26. Diversity is our strength

First-generation immigrant residents often seek out and feel more secure and comfortable in communities of their ethnic background. Not everyone sees diversity as their strength.

27. Regional Solutions and strategies

28. Implementation

29. Covid-19 and requests to delay the Plan

A new revamped Master Plan is not required if we accept Net Zero Growth and make incremental changes to the plan to offer more possibilities to people without requiring everyone to give up their cars and housing choices. Covid has made it clear that many people can work at home reducing rush hours, and that urban lifestyles make control of pandemics more difficult.

30. Next steps

Take a year to re-evaluate the changes needed in the current master plan. Enjoy our transportation choices, communities, and lifestyle choices, and fight Covid.

From: [Dedun Ingram](#)
To: [MCP-Chair](#)
Subject: Thrive Montgomery comment
Date: Wednesday, November 18, 2020 12:15:15 PM

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

November 17, 2020

Mr. Casey Anderson, Chair,
and Members of the County Planning Board
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, MD 20910

Dear Chair Anderson and Members of the Planning Board:

I concur with the planning staff that it is time to update the County's general plan and appreciate all of the work the planning staff has put into Thrive Montgomery 2050 and their efforts to involve county residents. I would like to submit the following general comments on the proposed new general Plan.

1. The Planning Board placed the public at a disadvantage when it adopted the hearing draft at the October 1 Planning board meeting after going through a long laundry list of things that needed to be added to the draft, removed from the draft, reorganized within the draft. It would have been preferable to postpone the public hearing and give the planning staff the two months they said they would need to revise the draft so that residents could comment on a draft that more closely resembles the draft likely to be sent forward to the County Council. As planning staff have said frequently, this plan will be an important document going forward and will significantly impact how the county grows and develops.

I request that the period for public comment be left open during the time period when the Planning board is holding its work sessions on Thrive Montgomery. Doing so will partially address the disadvantage residents have been placed at because we have reviewed a "preliminary" draft.

2. Currently Thrive Montgomery does not adequately address the long-term impacts of COVID-19. I have heard the argument that this is not a flaw because the basic issues covered by the draft are not changed by COVID-19. However, But I disagree. COVID-19 will have significant impacts on our lifestyle and the economy. While we cannot know the full impacts at this time, the draft plan should address these changes more directly. The County's budget is likely to be constrained for some years to come and this needs to be factored into the long-term expectations for what can be

accomplished and the implementation timeline.

3. It is unclear how successful the key component of the draft plan, complete communities, have been when implemented elsewhere and it is especially unclear whether they are suitable for application to an entire county. They appear to be better suited for application to small areas.

The draft plan does not adequately develop the concept of complete communities which makes it difficult for residents to assess whether or not this is a good goal for the plan. Urban, suburban, and rural complete communities are referred to but never really defined. What are the expectations for what constitutes each of these types of complete communities? Where in the county are these types expected to be located? How does the Agricultural Reserve fit into this complete community scheme? The settlement patterns of Montgomery County and its vast size make the establishment of complete communities throughout the County seem impractical and unrealistic. Further, the seeming focus in the draft plan on development of complete communities within one-half mile of metro stations, Purple Line stations, and planned BRT routes seems inequitable. Many of these areas already have more amenities than other neighborhoods in the county. It would seem more equitable and desirable to initially focus on improving our underserved communities by adding public facilities, services, infrastructure, and transit in those areas so that we raise the standard of living and quality of life of the residents of those neighborhoods.

The concept of 15-minute living also is not adequately defined and developed. We are offered 15-minute living by walking, cycling, driving, and transit. This is all very vague and confusing. Many of the goals specifically talk about a 15-minute walk for all county residents which clearly is impractical. As for complete communities, the concept of 15-minute living does not appear to be a realistic one for a county as large and as sparsely settled as Montgomery County.

4. From an economic standpoint, establishment of complete communities and 15-minute living in the next 30 years seems not just visionary, but fantastical. Currently, the County does not have sufficient funds to update its schools, libraries, recreation centers, much less build new ones. Nor does the County have sufficient funds to build the sidewalks and bike lanes currently needed (e.g., sidewalks to get passengers to Purple Line stations). There also are no funds to significantly expand our transit system. The County has finally managed to open the BRT route on Rt. 29, but that took years and there is no money to implement other BRT routes that have been on the list for years, to expand MARC service, etc. We cannot expect Montgomery County to thrive under this new general plan if it does not have a sound economic footing.

5. A goal of Thrive Montgomery is to stop planning for cars and even to make it difficult for people to get around using a car. This is not a good goal for this Plan. A reasonable and more realistic goal would be to plan more for pedestrians and cyclists and to make it easier for people to move around without using their cars. But the county is too large and too connected with the greater metropolitan area, people are moving within and through the county in so many directions, making trips for so many diverse reasons, that making it hard for them to do so will be detrimental to our residents, the county's economy, and the region as a whole.

6. The draft plan as currently organized is very difficult to use. It would be far more useful if the goals, policies, and actions related to a given topic were contained in a single chapter rather than scattered throughout multiple chapters. A number of the goals, policies, and actions seem too detailed for a general plan and could also “date” the plan. For example, there are a number of very specific items related to communications technology. Those items should be written in more general terms because we have no idea what those technologies will be in 30 years. The transit items also are written primarily in terms of BRT with dedicated lanes. Again, this is too specific.

Thank you for your consideration,

Deborah Ingram

4312 Willow Lane
Chevy Chase, MD

From: [Don Slater](#)
To: [MCP-Chair](#); [Thrive2050](#)
Subject: Written Testimony on Draft General Plan
Date: Wednesday, November 18, 2020 12:35:51 PM
Attachments: [Draft Thrive Testimony Don Slater.pdf](#)

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

See attached.

Don Slater

402 Mansfield Rd
Silver Spring, MD 20910
301-641-2925 (m)
Slater402@gmail.com

Don Slater Silver Spring, MD USA
slater402@gmail.com +1.301.641.2925 (m)

402 Mansfield Rd
Silver Spring MD 20910
13 November 2020

Chairman Anderson and members of the Commission:

Hello. My name is Don Slater. I reside at 402 Mansfield Road in the Park Hills neighborhood of Silver Spring. My wife, Tina, and I have lived in Silver Spring for 37 years and we have seen a lot of changes. I want to thank you for the opportunity to comment on the new plan, Thrive Montgomery 2050. It is an ambitious plan in many ways, but I have heard many express the notion that it does not go far enough. However, it is far from finished at this point. I will concentrate on a few aspects of the plan rather than trying to address all of it.

1. Complete Communities

- a. Montgomery County is a large, geographically diverse area. We have well defined urban spaces, several large suburban swatches, conventional small towns, and a significant agricultural expanse. 15-minute living will not look the same in Aspen Hill as it does in Chevy Chase. The county can change the nature of the suburbs and get people out of their cars by creating town centers on transit lines. Small towns have always had a level of self-sufficiency that supports 15-minute living. The plan should acknowledge the differences in the existing communities and work within their boundaries.
- b. The county population must reduce its dependency on automobiles. The county should incentivize the use of mass transit (including busses) and incentivize the use of electric vehicles (EVs) over fossil fuel ones.
- c. At the turn of the 20th century, much of the country was farmland and rural commerce centered on the small towns within that landscape. All of those little towns were connected to each other, and often to a larger city, by some kind of rail system. Most of those interurban rail lines are gone, but good bus service can take their place and provide that same level of connectivity without having to resort to a car with one person in it.

2. Safe and Efficient Travel

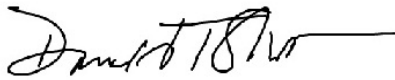
- a. In order to provide for this goal, we must work very hard to reduce our addiction to the fossil fuel automobile. Reduced car traffic is one of the keys to success for Vision Zero. Biking and walking are also risky in high traffic areas. For many in our lower income populations, a car is not an option and good bus service is critical. To accomplish this objective, we should build the entire Bus Rapid Transit (BRT) network as quickly as possible. It is likely that the new administration will be more amenable to providing funding for this.
- b. We have a hidden transportation gem running through the county in the form of the MARC Brunswick Line. The county should work with MTA and USDOT to provide reverse service, weekend service, and midday service on this line. Like all mass transit, dependable and frequent service quickly creates ridership.

3. Affordability and Attainability

- a. Montgomery County has always been a place where people want to live. We have nice neighborhoods, great parklands, and among the best public schools in the country. Unfortunately, we do not have enough housing, particularly affordable housing, for all the folks who want to live among these amenities. If we continue to have a housing shortage, those who can least afford to live here will be disproportionately impacted and be forced to live elsewhere, typically further away from jobs and services, adding to the traffic and absorbing the additional commuting costs. As long as we have a homeless population, we are not thriving. The county should be actively searching for properties that can be used as housing for those coming out of homelessness. We need to look at how we can turn surface parking lots and former office space into new forms of residential / retail offerings. The MPDU requirement should be increased. This should be happening across all of our currently developed areas, particularly near transit hubs.
- b. Now that we have talked about getting people into housing, we have to address keeping them in housing and protecting them from rent increases and evictions. The county should adopt rent indexing as a means of stabilizing rental costs. No one should have to face an eviction without legal representation. The county should seriously consider programs to provide financial assistance and counseling to first time home buyers.

Obviously, this is only addressing a small portion of the plan, but it is the portion I am most interested in and most familiar with. Others in the county will speak to and write about the rest of it. Thank you for your time and your service to the county.

Best regards,



Don Slater

402 Mansfield Rd
Silver Spring, MD 20910
301-641-2925 (m)
Slater402@gmail.com

From: [Hannah Sholder](#)
To: [MCP-Chair](#)
Subject: written testimony - affordable housing
Date: Wednesday, November 18, 2020 2:02:53 PM

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

Hello!

I think I just missed the deadline (by two hours) for submission of testimony for the Planning Board review of the draft Thrive 2050 plan, but hoping my comment can still be considered:

For the purposes of creating and preserving affordable housing I think our County should consider ways to **limit speculation on land value**. While the MPDU program is a great step in this direction, preserving properties in perpetuity through **Community Land Trusts** would be another strategy to consider.

Why I find the CLT strategy particularly compelling is that it enables limited-equity in the sale of residential and commercial properties (based on investments) but prevents inflation beyond this (which is largely related to proximity to public assets). This would prevent the flipping of properties as we have seen recently, for example, in frequent numbers in the East Silver Spring neighborhood (which has proximity to a permanently preserved urban farm and downtown silver spring shops).

Thank you for your consideration!
Best,
Hannah

From: [Buckley, Darcy B.](#)
To: [MCP-Chair](#)
Subject: Written Testimony: Thrive - Rustic Roads Advisory Committee
Date: Wednesday, November 18, 2020 2:34:42 PM
Attachments: [Thrive 2050 - RRAC Comments Letter - Revised Final copy.pdf](#)

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

Please see the attached testimony on the Thrive 2050 plan from the Rustic Roads Advisory Committee. Thank you.

Darcy Buckley, AICP
Transportation Planner, Director's Office
Department of Transportation (MCDOT)
Montgomery County, MD
Darcy.Buckley@montgomerycountymd.gov



For COVID-19 Information and resources, visit:
www.montgomerycountymd.gov/COVID19



RUSTIC ROADS ADVISORY COMMITTEE



November 18, 2020

Montgomery County Planning Board
Montgomery Planning, M-NCPPC
2425 Reedie Drive, 14th Floor
Wheaton, Maryland 20902

Re: Thrive Montgomery 2050 – Public Hearing Draft – Final 10-5

Dear Board Chair Anderson and Board Members Cichy, Fani-Gonzalez, Patterson, and Verma:

Our Committee oversees the Rustic Roads Program and the 99 roads currently protected under the Program. Under County Code, we advise you as well as the County Executive and the County Council on County policies and programs that may affect the Rustic Roads Program. In accordance with this responsibility we have reviewed the above-referenced draft of Thrive Montgomery 2050 (the Draft) and offer the following observations and suggestions for your consideration.

The Committee noted the scope of the Draft and the aspirations for the future of Montgomery County expressed therein. The Committee has taken the Draft section titled “The Plan Vision” (pages 46-48) as a starting point since it presents a compact statement of the where the county will be in 2050 if the aspirations contained in the Draft’s many elements are achieved.

In this vision, corridors are one of two encompassing components. Two types of corridors are described: (1) Multimodal transportation and services; and (2) green parks, stream valleys, and trails. While it is understandable that the focus of the Draft is on corridors linking the developed areas of the County, the committee believes that rustic roads deserve mention in the Draft as they provide access to and links between the rural areas of the County, most notably the Agricultural Reserve.

Rustic roads are valuable, irreplaceable assets to the county, and especially to the Agricultural Reserve. The following are among the many ways in which rustic roads will contribute to the realization of the Draft’s aspirations over the next thirty years.

- Rustic roads allow us to experience our history and develop an appreciation of shared culture. Our earliest roads followed animal migration routes and Native American trails. They are narrow, low volume roads in our rural areas and the Agricultural Reserve that reflect our past and how people moved and carried goods across time—to and from the Port of Baltimore, mills along our streams, warehouses along the Chesapeake & Ohio Canal, stations along the Baltimore & Ohio Railroad, and our county farms. These roads were not planned, but rather they evolved over time in response to area needs.
- These roads have economic impacts generated by visitors and tourists who enjoy them, travel them to visit our County’s many historical, natural and recreational rural attractions, and follow them to agritourism locations such as pick-your-own farms, produce farms with Community Supported Agriculture, horse boarding farms and other equestrian operations, and wineries and

breweries. Nine rustic roads lead to the C&O Canal and lock houses. In 2018, 4.4 million visitors spent an estimated \$84.5 million in the local gateway regions while visiting that park.

- The attraction of the Agriculture Reserve with its lovely historic rustic roads to employers and businesses cannot be overstated. Rustic roads provide a way for employees to unwind on weekends and after work. The driving experience on a rustic road, with the tree canopy and natural hedgerows, broad views of farms and fields, and access to beneficial activities are a salve for one's physical as well as mental health. Rustic roads help bring a feeling of connectedness by having a pleasant, safe "go to" place for everyone.
- Rustic roads epitomize many of the goals of Thrive 2050. Many have tree canopies and roadside forests and hedgerows that protect plant and wildlife diversity. The roadside drainage through grasses and vegetation prevents the erosion caused by ditches and swales, protecting our streams from harmful runoff. Most do not have streetlights, thus limiting harmful nighttime light pollution. The narrow rustic roads in the Ag Reserve maintain slower (safer) traffic speeds and promote sharing of the road with farm equipment, bicyclists, and equestrians.

Given the many ways in which rustic roads will contribute to the realization of the Draft over the next thirty years, the Committee recommends incorporating the following additions and modifications (shown in **bold**) into the Draft.

Theme 4: Safe and Efficient Travel, Goal 4.7, Page 80. Add the following Policy 4.7.3 and Action 4.7.3.a.

Policy 4.7.3: Ensure that the system of designated rustic roads is protected and maintained to preserve important historic, cultural, and natural features enabling a strong agritourism benefit to both farms and residents.

Action 4.7.3.a: Montgomery County Planning Department in coordination with MCDOT, the Rustic Roads Advisory Committee, and producers and advocates for the Agricultural Reserve, review and recommend safety measures, such as reduced speed limits, for rustic roads and all roadways in the Agricultural Reserve with the goal of increasing safe travel for bicyclists and pedestrians, while continuing to protect rustic roads.

Theme 7: Diverse and Adaptable Growth, Goal 7.4, Policy 7.4.3, Page 113. Add the following Action 7.4.3.1.

Action 7.4.3.1: Promote the County's rustic roads as the primary means for the public to access the Agricultural Reserve and thereby not only achieve the desired awareness of its agricultural, environmental, and economic benefits through direct experience, but also come to appreciate the many opportunities for personal benefits from access to health-enhancing nature, outside recreation, and artistic experiences.

Thank you for the opportunity to comment on this important document. If you have any questions, you may reach our Committee through our staff coordinator, Darcy Buckley, at Darcy.Buckley@montgomerycountymd.gov.

Sincerely,



Robert J. Tworowski, Chair
Rustic Roads Advisory Committee

Committee Members: Laura Van Etten, Dan Seamans, Robert Wilbur, Kamran Sadeghi, Lonnie Luther, Anne Davies, Leslie Saville (M-NCPPC)



From: [Coello, Catherine](#)
To: [MCP-Chair](#)
Subject: FW: Thrive Testimony
Date: Wednesday, November 18, 2020 3:17:42 PM
Attachments: [Montgomery Planning Board Testimony - November 19, 2020 Hearing - Thrive Montgomery 2050.pdf](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

From: Afzal, Khalid <khalid.afzal@montgomeryplanning.org>
Sent: Wednesday, November 18, 2020 3:07 PM
To: chair@mncppc-mc.org; Coello, Catherine <catherine.coello@mncppc-mc.org>
Subject: FW: Thrive Testimony



Khalid Afzal

Special Projects Manager-General Plan Update
Montgomery County Planning Department
2425 Reedie Drive, Wheaton, MD 20902
khalid.afzal@montgomeryplanning.org
301-495-4650



Let's Plan Our Future. Together.  **THRIVE**
THRIVEMONTGOMERY.COM



WE'VE MOVED!

THE NEW PARK AND PLANNING HEADQUARTERS IS NOW LOCATED AT
2425 REEDIE DRIVE, WHEATON, MD 20902

From: Peter Gray <peter@waba.org>
Sent: Wednesday, November 18, 2020 1:53 PM
To: Afzal, Khalid <khalid.afzal@montgomeryplanning.org>; Anderson, Casey <Casey.Anderson@mncppc-mc.org>
Subject: Thrive Testimony

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

Hope this is not too late for tomorrow night's hearing.



Montgomery Planning Board Testimony - November 19, 2020 Hearing - Thrive
Montgomery 2050

My name is Peter Gray and I am testifying on behalf of the Washington Area Bicyclist Association and the 1500+ WABA members who live in Montgomery County, plus the additional thousands of other County residents who have joined in actions in support of better bicycling in the region.

As an advocate for cyclists, but also for pedestrians and transit users, I applaud the Plan's highlighting the trend/challenge number 9 (page 22), that the County needs to stop planning for cars and should emphasize transit, walking and biking. As we emerge from the COVID crisis, it is even more clear that we will not thrive, transportation-wise, if we do not emphasize non-auto alternatives to get around the County. This idea is further reinforced by trend numbers 11 relating to health and 12 relating to climate change; we need to take more trips, especially shorter ones, by biking, walking and taking transit. In addition, the plan's emphasis on equity, means we should be planning and implementing ideas that allow County residents who cannot afford to use cars, to have reasonable and safe alternatives to the automobile. Moreover, WABA wholeheartedly endorses the Plan's commitment to a compact form of development which will facilitate the use of non-auto modes of transportation by placing more jobs and commercial activities in easier reach of County residents.

As a resident of the Forest Estates neighborhood in Silver Spring, I am very fortunate to be a 10 minute walk from a metro station. But my neighbors and I still lack truly walkable commercial amenities, such as groceries and restaurants which development adjacent to the Forest Glen metro might bring. We also suffer from a lack of safe, walkable and bikeable connections from our neighborhood to the Silver Spring and Wheaton CBDs which are both only a few miles away. The neighborhood's children should also have a safe route to get to the public schools that they attend. These problems could be resolved by a fulsome implementation of Goal 4, including a full buildout of the County Bike Master Plan and BRT implemented along Georgia Avenue.

Most residents of the County suffer even more from a lack of walkable, bikeable and transit connections to commerce and jobs to a much larger degree than me and my

neighbors. The concepts in the Plan you are considering can solve those problems once the plan is approved and funding is provided to implement the solutions the Plan proposes. (See Goal 1.1 and 1.2 pages 54-55).

In summary, WABA calls for the approval of the Thrive Montgomery 2050 Plan by the Planning Board and the County Council and then a robust set of legislative and budget initiatives that ensure the Plan is fully realized.