## Northwood Four Corners Civic Association

These written comments are being submitted on behalf of the Northwood Four Corners Civic Association (NFCCA).[1] Please include this submission as part of the November 19, 2020 hearing record regarding the Thrive Montgomery 2050 (TM 2050) planning process.

The close-in community of Four Corners in Silver Spring, which is located in southeastern Montgomery County, is made up of three neighborhoods—Northwood-Four Corners, Woodmoor, and South Four Corners—each of which are represented by their own civic associations. Montgomery Blair High School sits on the fourth quadrant. Although these neighborhoods and the high school are separated by major thoroughfares (US 29—Colesville Road and Route 193—University Boulevard) they function together as a racially diverse, cohesive, and appealing community stitched together by a distinct commercial district, shared schools, active church and civic organizations, and small-lot single-family housing stock that remains affordable to moderate- and middle-income families.

Recognizing that the goal of TM 2050 is to envision planning concepts and goals for the entire county, NFCCA would nonetheless like to underscore that a thorough planning process should recognize that the whole is a sum of its parts. NFCCA represents an area covered by both the Four Corners Master Plan and the Kemp Mill Master plan. A detailed re-analysis of the Four Corners area's housing composition, economic and commercial development opportunities, walkability, community amenities, social services and place-making needs, as well as the environmental and neighborhood impact of transportation/highway decisions that have been implemented in this area is long overdue. The last Four Corners Master Plan was adopted in 1996—24 years ago. The Master Plan in nearby in Kemp Mill was last updated in 2001. An in-depth planning effort to evaluate community-specific issues and update the Four Corners Master Plan and the Kemp Mill Master Plan, in our view, is a critical predicate to the TM 2050 planning exercise.

One could argue that the Four Corners community could serve as an ideal test case for the Maryland-National Capital Park and Planning Commission (MNCPPC) effort to implement many of the goals expressed in the draft planning document: "Thrive Montgomery 2050 is proposing certain foundational elements that make places resilient and sustainable and have proven remarkably consistent over time. They are urbanism and Complete Communities, compact development, and transit and walkability. The

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[1] A map illustrating the boundaries of the NFCCA community can be found at http://www.nfcca.org/area.html.

Plan relies on these elements to establish a framework for the next generation of our county's development. 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. The Plan calls it 15-minute living."[2]

**Transportation Barriers Impede 15-minute Living**

The Four Corners area is a major portal to up-county and downtown Silver Spring. There are two Beltway exits near the Route 193/US 29 intersection. These two multi-lane thoroughfares serve as major east/west and north/south transportation routes in the eastern portion of the county. Traffic is particularly heavy on US 29 because the options for north/south travel in the southeastern portion of the county are extremely limited (alternative routes are New Hampshire Avenue and Georgia Avenue.)

The goal of more efficiently moving traffic along densely travelled major thoroughfares should not impact the quality of life in nearby communities.[3] One of the primary goals of the TM 2050 planning process is to promote the concept of Connecting Communities so that "Every resident should have the opportunity to live, work, play, exercise, shop, learn, and make use of public amenities and services within a 15-minute walk or bike ride."[4]  The need to move high traffic volume through the Four Corners Route 193/US 29 intersection should be balanced against the desire of local residents to enjoy a walkable community.[5]

To promote walkability and bike-ability in the Four Corners community, county planning and transportation agencies should take steps to reduce cut-through traffic and discourage speeding by installing traffic calming measures in residential neighborhoods and lowering highway speeds approaching this intersection. If east/west flow on University Boulevard Route 193 could be improved, fewer frustrated drivers would resort to cutting through these neighborhoods.

The Four Corners intersection is a busy crossroads that offers local residents the potential to safely enjoy a connected community. There are multiple public transportation stops (FLASH, Metro, and Rideon), as well as grocery stores, restaurants, a church, schools, a heavily used local park, senior housing, and multi-

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[2] Thrive Montgomery 2050 Public Hearing Draft Plan.

[3] See Thrive Montgomery 2050 Public Hearing Draft Plan , 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.

[4] Thrive Montgomery 2050 Public Hearing Draft Plan , Policy 1.1.1: Allow and encourage a variety of uses within communities, with sufficient density to make these uses viable, so that people can experience 15-minute living. Every resident should have the opportunity to live, work, play, exercise, shop, learn, and make use of public amenities and services within a 15-minute walk or bike ride.

[5] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 4.7.1: Prioritize implementing safe and connected low-stress bicycle and pedestrian networks in rail and BRT corridors over projects that increase traffic capacity.

sector commercial businesses.[6] Done right, future planning steps will enhance walkability and reduce pedestrian injuries and fatalities.[7]

Walkability in Four Corners is not an amenity so much as it is a necessity. A number of pedestrians have been hit and even killed nearby on Colesville Road and University Boulevard.[8] If this area is made safer, community residents will certainly walk to the many nearby businesses, restaurants, and public amenities.[9]

We urge the County to install pedestrian safety measures and make changes to increase the walkability of the Four Corners area. To make 15-minute living a reality in Four Corners, additional walk-signs, crosswalks, caution signage, or blinking lights, or other measures should be installed. In particular, there needs to be a crosswalk and walk sign or blinking caution light on University Boulevard traveling west to allow pedestrians to cross to Safeway and the post office (currently a crosswalk and walk sign only serves pedestrians crossing University Boulevard traveling east.) Also, transportation planners should consider decreasing the length of the traffic light cycles at the intersection of US 29 and Route 193 to give pedestrians more frequent opportunities to cross safely with the walk signals. Walkers often cross when the light is red because long signal times discourage waiting.

NFCCA also supports efforts to enhance "last mile" transportation options.[10] At a public forum last spring, agency officials stated that RideOn is considering micro-transit in the Four Corners area to encourage heavier use of public transportation. "Flex" is envisioned as a first/last mile service using on-demand small passenger buses to transport local residents to the local FLASH stop or the Four Corners commercial shopping center. The boundaries for this proposed "Flex" service, however, have not yet been established. If implemented in this area, "Flex" micro-transit system would tie the Four Corners neighborhoods into the broader transit system as well as support the health of the commercial establishments in Four Corners by increasing patronage by the local community.

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[6] See Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 2.3.1: Ensure a network of equitably distributed, easily accessible neighborhood based services, ideally within walking or biking distance of residents' homes to allow for increased social connections.

[7] See Thrive Montgomery 2050 Public Hearing Draft Plan, Action 2.1.3.a: Create a pedestrian infrastructure improvements priority list in coordination with county and state transportation agencies in order to implement walkability standards in communities underserved by safe, walkable infrastructure. Use the Pedestrian Master Plan and the mapping analysis of community equity emphasis areas to inform this list.

[8] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 4.4.3: Prioritize changes to the transportation system at locations with a history of high rates of crashes and address safety issues in areas with little or no crash history. Base priorities on an analysis of locations where future crashes are likely to occur.

[9] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Goal 4.4: Eliminate all transportation-related fatalities and severe injuries. Provide a transportation system that is safe for everyone. See also, Policy 4.4.1: Prioritize eliminating transportation-related fatalities and severe injuries in public and private planning and development initiatives and programs, including master plans, capital Public Hearing Draft Plan, Thrive Montgomery 2050 projects, and development projects. Area master plans and transportation capital projects must include safety analyses to inform plan recommendations and project design.

[10] See Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 4.1.8: Strengthen access from low-density areas to rail and BRT stations, commercial areas and other services by providing flexible transportation services, including microtransit and micromobility.

Also, alternative local transportation modes, such as on-demand services for bicycles and scooters, would serve an important purpose in offering additional "last mile" options to connect to public transportation and limit the use of autos for short trips. TM 2050 should continue to support expanding the system of protected lanes to encourage the use of cleaner transportation options and increase their safety.

**Economic Development**

As mentioned previously, Four Corners is a major close-in urban community and sits at a major east/west/north/south transportation crossroad.[11] Strong consideration should be given to expanding economic development support to local businesses and providing social services facilities at this key intersection.[12] There is a higher concentration of low-to moderate-income households in the southeastern section of Montgomery County, creating a greater need for supportive social services, such as affordable child care and elder care, employment training, small business support and incubation, financial education coaching/counseling, recreation programs and assets, etc.[13]

The small-scale businesses in the Four Corners commercial district would benefit from redevelopment to connect the surrounding neighborhoods to a vibrant, well-designed, safely walkable shopping district.[14] A more cohesive redesign that ties the businesses located on the three corners and in the median at this intersection would greatly enhance the inter-relation, unity, livability, walkability, attractiveness, and cohesion of the Four Corners communities.[15]

In the mid-nineties, the county contributed resources to "refresh" the Woodmoor Shopping Center in the northeast quadrant. However, today, commercial properties in the northwest quadrant of Four Corners fronting both US 29 and Rte. 193 remain a mish-mash of aging commercial-use buildings—a handful of which are converted single family residences. Also, several key businesses—the Capital One branch, the Veterinarian office, and the Gamestop recently closed and remain vacant today.

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[11] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 7.2.1: Incentivize development and public realm improvements along rail and BRT corridors. See also, Action 7.2.1.a: Initiate master, sector, and corridor plans to transform rail and BRT corridors and station areas and identify opportunities to incentivize development and improvements.

[12] See Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 3.1.1: Support the efforts of the county's economic development agencies to retain and grow existing businesses and attract new businesses.

[13] See, Thrive Montgomery 2050 Public Hearing Draft Plan , Policy2.1.1: Use public space to facilitate active lifestyles, physical connections and interactions among diverse populations. Ensure each neighborhood has public spaces that establish a culture of inclusion and that encourage people to linger.   See also, Thrive Montgomery 2050 Public Hearing Draft Plan, Action 7.2.1.b: Conduct an evaluation of the Commercial / Residential and Employment Zones Incentive Density Implementation Guidelines for development projects, including the required public benefits, and public benefit categories and criteria to provide incentives for increased density around rail and BRT corridors.

[14] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 7.1.4: Encourage redevelopment of underutilized properties, particularly near rail and BRT, by updating zoning and developing a suite of financial tools needed to catalyze redevelopment.

[15] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Goal 8.6: Ensure all communities benefit equitably from good design, regardless of their location or demographics.

Montgomery County agencies should work with commercial property owners to redevelop the land and buildings fronting University Boulevard to create a more vibrant and visually appealing commercial strip.[16] Particular emphasis should be placed on providing additional parking to serve small businesses located on both Colesville Road and along University Boulevard by acquiring land for public parking to serve these local businesses.

Stores and restaurants fronting Colesville Road struggle, in great part due to lack of parking, which has contributed to the frequent failure and/or turnover of the small businesses located there. Customer parking spills over onto nearby streets; residents who can't find sufficient parking have resorted to paving much of their front yards. Although the TM 2050 plan seeks to discourage driving by reducing public parking availability, adding more parking in the Four Corners area could in fact reduce driving by encouraging local residents to patronize nearby local establishments.

Last, but not least, strong consideration should be given to purchasing available property to replace the current Four Corners post office, which is too small and for which access and parking are extremely limited. This action was recommended in the 1996 Four Corners Master Plan.

It is time for the TM 2050 plan to rethink how best to boost this area's economic and commercial potential and to consider a strategic move to invest in and revitalize the commercial zone in this quadrant of Four Corners.


**Connecting Communities**

TM 2050 planning should evaluate how best to leverage the potential benefit that the public transportation hub at the Four Corners intersection can offer to the wider community. Siting social services and training programs at this intersection would offer easy access to meet the needs of local community populations.[17]

Currently, there is second floor office space in the commercial properties that flank this intersection that could serve as an ideal location to offer small business education initiatives, workforce development programs, or house business incubators, e.g. kitchen space for small catering businesses.

Increasing support to businesses and social services facilities, such as affordable child care and elder care, employment training, small business support and incubation,

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[16] See Thrive Montgomery 2050 Public Hearing Draft Plan 2.1.1.b: Amend appropriate zones in the Montgomery County Zoning Ordinance to incentivize and prioritize design features in private development projects that facilitate day-to-day interactions. These features could include wide sidewalks, inviting and well-designed public gathering spaces, outdoor seating and lawn areas, and pathways and trails. See also, See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 8.6.1: Develop and implement tools and strategies to ensure that the quality of design of public and private buildings, streets, and public spaces in all parts of the county are equitable and respond to the needs of local residents.

[17] See Thrive Montgomery 2050 Public Hearing Draft Plan, Goal 2.3: Improve access to neighborhood-based services such as housing, jobs, professional and government services, educational opportunities, and parks and open spaces at the local, county-wide, and regional level. Focus on county residents with the greatest socioeconomic needs and for those who are geographically isolated from these services.

financial education coaching/counseling, recreation assets, etc. would benefit low- and moderate- income residents who want to build a better future for themselves and their families.[18]

**Environmental Protection**

One of the TM 2050 goals is to: "Promote active lifestyles by making parks and open spaces a central element of the community."

With the renovation and expansion of the Northwood Four Corners Local Park, both residents who live in the community as well as people from nearby communities enjoy easy access to this park, which now attracts a diverse community of users. The success of this major investment by the county and the parks department is evident in the significant number of people who are now using the playgrounds, walking tracks, picnic areas, and soccer field.[19]

Unfortunately, some time ago the parks planning agency decided to decommission the recreation center in this park. The building was leased to a private school. Instead of serving the community as a whole, this space is now occupied for use by a very limited number of people.

This recreational center facility should be repurposed for general public use when the current lease expires in 2023. Doing so will enhance the community by providing an all-season gathering space and offering access to electrical and kitchen facilities for both indoor and outdoor community events. The platform in front of this building could serve as an ideal stage for community concerts or movies.

In the northwestern portion of the Northwood Four Corners Local Park, there is a large field bounded by an oval walking track. Consideration should be given to how best this larger space could be used while still allowing free play. For example, installation of a gathering circle, gazebo, or combination band shell/movie screen could make this an even more successful community gathering place.[20]

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[18] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 8.2.5: Use placemaking activities to engage residents in higher levels of social interaction in public spaces. Create public spaces that are welcoming and encourage all residents to gather and interact in ways that build a sense of community.

[19] See Thrive Montgomery 2050 Public Hearing Draft Plan, Action 2.1.2.c: Update the state-mandated strategic plan for parks, recreation, and open spaces to reflect the evolving roles of parks in urban and urbanizing areas as platforms for social gathering, active and healthy living, and connection to nature.

[20] See Thrive Montgomery 2050 Public Hearing Draft Plan, Action 2.1.2.d: Create new design typologies for park facilities in urban areas such as community gardens, dog parks, skate parks, playgrounds, community open space, and picnic and grill spaces. Include guidance in the new typologies that the designs should reflect the culture and traditions of the communities where they are located.

Northwood Four Corners is also bordered by the Northwest Branch park system, which includes extensive natural surface trails, wetlands, and the stream. This park is heavily used by neighborhood residents as well as others who can park at Burnt Mills.

The heavily forested Northwest Branch corridor, which stretches from Bonifant Road to the southeastern county line, is a key natural resource in an otherwise highly built-up urban environment.[21] The Northwest Branch feeds into the Anacostia/Potomac rivers. The environmental health of this natural setting contributes to cleaner air in a highly urbanized area, and, if properly managed, preserves clean water.

Natural trails in Northwest Branch near Four Corners are well-used; hikers and nearby residents regularly report sightings of a wide variety of wildlife—amazingly in an area that is within a mile of the Beltway and bisected by a heavily trafficked US 29. Preserving the environmental health and biodiversity of wildlife in the Northwest Branch corridor is an important environmental goal.[22]

Northwest Branch would benefit from environmental improvements along feeder streambeds by removing over-growth and invasive vines and installing natural water-filtering plantings.[23] Specifically, the county recently made stormwater control improvements at the end of Lockridge Drive, however, no work was performed in the portion of the stream bed that runs the remaining three blocks from Glenwild to Eastwood. Steep banks continue to erode in this section allowing sediment and unfiltered stormwater, to flow down into Northwest Branch.

NFCCA strongly supports planning efforts to enhance environmental health and biodiversity conservation in both urban areas and parks in the county through resource conservation, clean water initiatives, and habitat preservation and restoration. The TM 2050 plan should be compatible with the Montgomery County Climate Action Plan.  Also, TM 2050 findings should comport with Maryland's statutory and regulatory requirements for Environmental Impact Studies prior to commencing significant infrastructure changes or developments.

**Conclusion**

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[21] See, Thrive Montgomery 2050 Public Hearing Draft Plan, 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. See also, Thrive Montgomery 2050 Public Hearing Draft Plan 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 nonforest canopy goals and strategies to protect plant and wildlife diversity and human health.

[22] See, Thrive Montgomery 2050 Public Hearing Draft Plan, 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.

[23] See, Thrive Montgomery 2050 Public Hearing Draft Plan, Policy 6.5.5: Reduce and manage invasive and other problem species to levels that pose no significant threats to green areas. See also, 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.

NFCCA appreciates the opportunity to express our views regarding the Thrive Montgomery 2050 planning process and requests that this statement be made part of the November 19th hearing record.

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Chairman Anderson, Ms. Wright and Councilmember Friedson,

Attached please find the perspectives on the East Bethesda Citizens Association (EBCA) on the draft Thrive 2050 plan in advance of the Board hearing on November 19.

Please reach out with any questions regarding the perspectives of EBCA on this matter.

Regards,
Andy O'Hare
President, EBCA

November 16, 2020

TO:  Mr. Casey Anderson, Chair, Montgomery County Planning Board
     Members of the Montgomery County Planning Board
     Gwen Wright, Director, Montgomery County Planning
     Montgomery County Planning Staff

CC:  Andrew Friedson, Montgomery County District 1 Councilmember

RE:  **THRIVE 2050 Public Hearing, November 19, 2020**

I am writing on behalf of the East Bethesda Citizens Association to provide comments on the Public Hearing Draft Plan of the new county General Plan, called "Thrive 2050." EBCA is very concerned about the process being employed to develop this plan. Specifically, we have serious concerns about the timing of the review of this Draft Plan during a worsening pandemic and amongst heated national and local elections. EBCA believes that the approach to develop this far-reaching and long-term Plan needs to be much more deliberate and designed to engage as many Montgomery County residents as possible. The approach being used to date is insufficient and risks a serious community backlash.

Notwithstanding the above, it is clear that this draft Plan requires a considerable amount of additional work and input, and we are hopeful you will consider comments and suggestions thoroughly and take the time to answer the many outstanding questions from the community.

We support the High-Level Executive Summary of Suggestions & Concerns outlined in the Community Coalition Letter on Thrive Montgomery 2050 dated November 16, 2020, which includes the following points:

I.  Complete Communities: we were pleased to see that the draft Plan considered Complete Communities but the inclusion of a map that spotlights which or what proportion of urban, suburban and rural communities are to become Complete Communities replete with Missing Middle housing would be helpful; additionally, there is a paucity of relevant national best practices, omission of any description as to how both incorporated and unincorporated communities will be a part of the redevelopment process that recognizes building and setback authority, a disconnect with MCPS' plans for larger or

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magnet schools, and a lack of defined minimum amenities and metrics for determining a successful Complete Community with adequate public facilities, green space, transit infrastructure, and affordable housing. In short, the concept of, location of, and metrics for Complete Communities is incomplete.

II. <u>Financing Capacity</u>: there is a lack of acknowledgement of COVID-19's impact on our economy, public revenue deficits, transit use changes, work preferences and lifestyle; in addition, there appears to be an unsupported premise that increased Missing Middle housing stock creates Complete Communities and no attempt in giving equal weight to the importance of job creation, transit, and housing; furthermore, there is a glaring omission of strategies for how public revenue will substantially increase in order to fund decentralized public facilities, small local schools, and transit infrastructure projects, and a dearth of strategies that attract new industries, companies and small businesses to the County.

III. <u>Housing Affordability</u>: we encourage the County to consider increasing and diversifying areas for Missing Middle housing as well as provide more housing for essential workers and 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; however the premise that we will need to house 200,000 more residents is based on pre-COVID-19 assumptions and providing Missing Middle housing is not ipso facto affordable.

IV. <u>Transportation Access</u>: we encourage the County to develop a broader approach focused on BRT, specify how transit-centric transportation will be staged given COVID-19 realities, flexibly plan for traffic and technology advancements, integrate with other regional transportation plans, and accommodate demographics including aging, disabled, and young families that cannot always use public transit; also, coordination with MDOT will be essential along with the recognition that many County residents and visitors will use their cars.

V. <u>Public Facility Implementation Plans</u>: the draft Plan will be expensive to implement so the County should specify payment plans for public facilities, pay more attention to how existing disadvantaged and low-income communities specifically will gain better access to transit and other amenities, coordinate with MCPS, Police and Fire & Rescue, and build in equity so that Complete Communities are available throughout the entire County.

VI. <u>General Implementation Plan</u>: utilize Master & Sector Plans for implementation as well as design excellence standards; and update the Implementation Plan so that it reflects the realities of COVID-19.

Bethesda area residents have recently experienced a considerable amount of growth and change related to implementation of the Bethesda Downtown Plan, the construction of the Purple Line, a significant number of residential and commercial development projects proposed and under construction, and of course now the impacts of Covid-19 which have brought a tremendous amount of uncertainly to how people will live, work, and travel in

the future. We hope to be able to work with both the Planning Board, and ultimately the Council as well, to improve on the new General Plan and create a document that will truly allow Montgomery County to thrive.  Thank you for considering the perspectives of EBCA on this matter.  I may be reached at (202) 270-0094 or president@ebca.org to address any questions on our views.

Regards.

Andy O'Hare
President, EBCA

Good afternoon Chair Anderson,

I hope this email finds you well. Please find attached the Montgomery County Food Council's testimony for the public hearing that will be held this Thursday, 11/19, regarding the Thrive Montgomery 2050 Draft Plan. Please let me know if you have any questions, and thank you for the opportunity to share our feedback with the Planning Board.

Best,
Catherine Nardi

Catherine Nardi
Programs Manager, Montgomery County Food Council
Pronouns: she/her/hers

Tel: 301-664-4010
Web: www.mocofoodcouncil.org/donate/
Facebook: https://www.facebook.com/mocofoodcouncil
Twitter: MoCoFoodCouncil
Instagram: mocofoodcouncil

The Montgomery County Food Council is committed to building equity and racial justice in our local food system. Learn more here.

## Thrive 2050 Comments
November 19, 2020

*The Montgomery County Food Council is an independent council formed and led by individual community members and representatives of local businesses, government, non-profit organizations, and educational institutions that broadly represent the food system both substantively and geographically.*

*Our mission is to bring together a diverse representation of stakeholders in a public and private partnership to improve the environmental, economic, social and nutritional health of Montgomery County, Maryland through the creation of a robust, local, sustainable food system.*

The Food Council thanks Chair Casey Anderson and the Montgomery County Department of Planning for the continued opportunities to provide feedback on the Thrive 2050 plans, and for the time and careful thought that has been dedicated to this process. We appreciate the addition of new sections and clarity related to the food system, and have developed a few additional recommendations to better center food system priorities into the update of Montgomery County's General Plan. Food is a basic human right, and the food system is deeply connected to all aspects of a resident's life. Thrive 2050 should reflect this, by applying a food system lens to each of the plan elements, and by drawing insight from diverse County stakeholders when considering health equity and food justice, economic opportunity, and environmental resilience. Thank you for your consideration of our input.

### *Regarding Complete Communities, Connectedness, and Safe and Efficient Travel*
Amidst the COVID-19 pandemic, it is estimated that the number of Montgomery County residents experiencing food insecurity has risen to more than 100,000, with Food Assistance Providers reporting increased demand ranging from 75-500%. Though people experiencing food insecurity live throughout the County, census tracts in East County,

Silver Spring, Aspen Hill, Wheaton, Gaithersburg and Germantown are pinpointed as areas of significant food access challenges.

While public transportation, walkability, and bike accessibility are critical priorities to reduce emissions, special consideration should be made to address food access barriers for residents without access to a car and/or with physical disabilities. First, the "Complete Communities" goals should include multiple food access points conveniently located within communities, at which culturally-appropriate, affordable, and nutritious food options are available. We support the establishment of healthy corner stores, farmers markets, and other access points for federal benefits usage in under-resourced communities as recommended in the 2017 Retail Trends Study.

The Food Council also supports the Better Buses Platform, developed by the Coalition for Smarter Growth, which seeks to prioritize buses as the mode of choice, being fare-free and carbon neutral. By ensuring accessibility to critical food access points through public transportation routes, residents will become more likely to rely on public transportation, which tends to be more inclusive of people with physical disabilities than bike or walking pathways.

### Regarding a Resilient Economy, and Diverse and Adaptable Growth

Our local food system encompasses a diverse array of food and beverage producers, restaurants, caterers, food retailers, farms, and other food producers that are integral to our economy and food supply. The COVID-19 outbreak has highlighted the need for a robust and resilient local food economy, including enhanced connectivity among our food producers and food assistance providers, as well as connectivity between food producers and residents. In order to develop Montgomery County into a national leader in the field of innovative food production, we must expand our food production infrastructure to ensure that our local food system can grow sustainably and collectively.

As climate and health emergencies continue to impact global food production and distribution, the local food supply will be increasingly important to feed our County and region; strengthening and supporting our local food production capacity should be a long-term goal. In addition to the goals set forth in the Thrive 2050 report, we recommend the following to further bolster our local food economy:
- Shared use kitchens, cut and wash facilities and processing equipment for farm produce, meat, and grains, and aggregation and distribution infrastructure, as well as long-term access to affordable farmland and protected land leases, particularly for

BIPOC and historically disadvantaged farmers, are needed for local businesses to meet these expanding market opportunities and address future crises.

- County institutions, including government-facility food service operations, hospitals, and academic institutions, should prioritize a percentage of food procurement from hyperlocal sources, while balancing affordability for local consumers and the true value of the product to ensure economic sustainability for the producers. The Montgomery County Farm to Food Bank Program serves as a model for these sourcing partnerships to follow.
- Free programming and resources should be made available to all County residents in accordance with the recommendations of the Food Literacy Assessment, to increase awareness of the food production capabilities that lie within the 93,000 acre Agricultural Reserve and beyond, in various parts of the County and at various levels.

## Regarding Affordability and Attainability

Food access is innately intertwined with the various community structures that support a growing population, such as affordable housing and workforce development opportunities. Planning goals in this section should incorporate food access as an intrinsic part of fostering an affordable and attainable lifestyle in Montgomery County.

Food is not simply an "amenity," but a basic human necessity, and should be recognized as such in the planning process. Affordable, healthy food access considerations should be incorporated into the General Plan, focusing on people living below the self-sufficiency standard, seniors, children, people with disabilities, and foreign-born residents. The Food Council welcomes the opportunity to collaborate with the Montgomery County Department of Planning to envision a roadmap to end food insecurity as a component of the General Plan and extension of the five year Food Security Plan, which is entering its fourth year of implementation.

## Regarding a Healthy Environment

The Food Council applauds the Department of Planning for addressing the need to ensure healthy food access for all residents within this section, and encourages the incorporation of additional "Actions" to accompany the "Policies" that have been established. Data collection and analysis are necessary to gain a better understanding of, and adequately address, the "concentration sources of unhealthy food" within our communities and work towards establishing more inclusive, nutritious, locally-produced offerings.

In recent months, the number of residents and community-based organizations exploring food production opportunities have grown tremendously, and support for urban and community gardening, as well as residential agriculture, through zoning and programming recommendations within the General Plan, should support the expansion of local food production efforts and ensure a sustainable, nutritious local food supply. The Plan should also include actions to explore and implement food waste composting infrastructure within the County's borders, which will improve the health of our soils and serve as valuable resource and economic opportunity for our farmers, residents, and the government, all while bringing us closer to meeting the County's Zero Waste goals in the near term.

Bringing together County partners who are guiding various aspects of this work already, including Montgomery Parks and the Department of Environmental Protection, along with the Department of Health and Human Services and the Food Council, will allow a coordinated, collaborative approach to establishing a healthy environment within Montgomery County. Simultaneously, we must integrate the voices of our community, including farmers and BIPOC residents who are most affected by the impacts of climate change and food access, to address these issues and develop solutions.

Finally, community education and outreach efforts, especially to residents in traditionally under-resourced neighborhoods with limited food access, should continue to be purposeful and focused, to ensure the inclusion of equitable food system support strategies within the Thrive 2050 Plan. These engagement efforts will effectively build relationships, strengthen trust, and foster partnerships within Montgomery County, and elevate the voices of community leaders seeking meaningful changes.

Thank you for your consideration of these recommendations, and we look forward to continuing to serve as a resource to the Planning Board throughout this process.

For additional information please contact Heather Bruskin, Executive Director, at the email address or phone number listed below.

## Greater Colesville Citizens Association

PO Box 4087

Colesville, MD 20914

November 19, 2020

Montgomery County Planning Board

Attn: Casey Anderson, Chair

2425 Reedie Drive

Wheaton, MD 20902

Thrive Montgomery 2050

Dear Chairman Anderson:

There are many good ideas in the draft Thrive Montgomery Plan. After reading 166 pages, we had a hard time pointing out many goals and polices where we disagree. On the other hand, we also found it difficult to point out the document thrust. Rather, it is more like a collection of ideas from many different people put together with minimal organization and focus. We think that Chairman Anderson's comments in October are largely correct. The comments we provide below are intended to fulfill two purposes: identify proposals that we support or oppose, and provide suggestions for improving the document in terms of organization and focus. We think the suggested improvements will be a good start in addressing the Chairman's concerns as well.

### Comments on Introduction

The current document takes 50 pages and six topics to provide what is effectively the introduction. This is too long and some of the topics need to be combined. This section needs substantial revision to make it clear and set the stage for the goals and policies that follow.

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There are two sections addressing the same point and thus they should be combined: "Why update the General Plan" starting on page 11 and "Rational and Content", starting on page 31. Much of what is discussed in "Rationale and Content" is not rationale but a proposed approach. It needs to be included in the applicable element. The "Why Update" section should be short and point to the "Trends and Challenges" section which directly follows it.

The 12 Trends and Challenges topic is generally good and they should form the basis for the goals and policies provided later in the document. However, the seven trends (1-6 and 11) need to be separated from the five challenges (7-10 and 12). The most important challenges should be identified first. We think there are three overarching challenges that the county must face in order to be successful: economic development (#8), efficient mobility other than driving (#9) and the environment (#12). We agree that housing (#7) is an issue but addressing the three prior issues will go a long way toward addressing it (i.e. with Complete Communities).  The Regional Solutions (#10) is not a challenge but rather part of an element and thus should be eliminated from this list.

The subject of equity should be included in the list of challenges discussed above.  We suggest eliminating pages 25 and 26. Page 27, the top half of 28, and information after the bullets on page 29 should remain as the challenge. In the second bullet on page 29, the county should not be creating new communities for any race or ethnic group since communities should be available everyone. The equity text from page 35 needs to be included in this challenge.

The text on page 35 covering the three overarching outcomes should be deleted since these outcomes are the three major challenges.

The major themes on pages 36-44 need to be linked back to the five challenges and form the basis for the elements that follow.  One vehicle to starting addressing all five challenges is through Complete Communities, which would be applied in the desired growth centers. They include CBDs, Metro Station Policy Areas and town centers, most of which will be located at select premium transit stations on Metrorail, Purple Line and BRT corridors. We don't agree that there should be a lot of growth between these communities along the corridors (page 37). The existing single family housing between the centers will largely remain unchanged since large numbers of individual homeowners will not be converting them. The redevelopment will largely occur in existing retail centers or older multifamily housing. Since these locations today are of varying sizes, the centers will need to be of different sizes. The bulk of the redevelopment should occur in the larger centers. The number of illustrations (pages 38-40) should be reduced.

For each of the themes, text needs to be added to explain how it relates to the trends and addresses the challenges. Every challenge needs to be addressed by at least one theme. The linkage is largely missing.

Our comments on the other themes on pages 41-44 are:
- "Plan for people not cars", we agree with providing more transit, walking and biking alternatives.
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- "Racial justice and equity" should be a theme. The comments above on equity also apply here.
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- "Regional solutions and strategies". Eliminate this as a theme since it is not at the same level as the others. It should be included in the elements.

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**Comments for the Elements as a Group**

We don't disagree with many of the actions under the eight elements but this document is not where they should be considered.  The actions make the document read more like a staff work plan rather than a vision of the future. Most of the actions identified in the document are studies and should be moved to an appendix and identified as possible work items. If any action should be retained, it should be included in the policy.

Page 49 identifies eight interrelated elements. Each element has goals and policies related to it but there are also many related to the other elements.  The goals and policies need to be limited to one element to avoid duplication and frustrate the reader. A sentence could be added several places in the document to indicate each element interacts with the other elements.

The title "Issues and Challenges: needs to be changed to "Trends and Challenges" to match that in the introduction. The text here needs to include the ideals provided previously and built upon here.

**Comments on Each Element**

1. **Complete Communities**

We support the idea of complete communities but the following changes are needed:

- The land would fall into one of two categories: CBDs, Metro Policy areas, and town centers (which we just call town centers); and areas between them. There are many acres in urban and suburban areas that are not within a town center. The text reads as if everything is in a town center. The text needs to be changed to correct that impression.
- The 15 –minute walk applies to larger town centers but not the areas between them.
- The services will exist in larger town centers, but few if any would exist between them. The area between centers is largely made up of single family housing and that will change little over the life of the plan.
- Please modify or, better yet, delete the apparent value statement.on the bottom of page 51. It is presumptuous to assume "most older adults" do or do not need or want "larger houses", or they are "forced" to live there.
- The town centers should largely be along premium transit corridors (Metrorail, Purple Line or BRT). The few town centers elsewhere will have limited transit and much fewer services
- Auto traffic will continue to be a primary means of mobility outside town centers where premium transit is not available. Therefore contrary to policy 1.1.3, walking and bicycling will not be the highest priority. A balanced approach for all modes of travel is needed. Outside of larger town centers, transit and auto are probably the highest priority for travel and walking/biking are largely for leisure.
- Local bus service will not be everywhere outside of town centers, but will exist in some urban and suburban areas. However, as automatous vehicles become available, they can be used to transport people to town center or premium transit stations.
- **In goal 1.1**, change the word "communities" in two places to "town center" since community is a general area while town center is more defined.
- **In goal 1.2**, many town centers will not have any public building or in some cases a park. The County needs to guard against over specifying design, art and public benefits. The private sector needs freedom to innovate.
- **In goal 1.3,** eliminate the first four words: "Promote active lifestyles by".
- **In goal 1.4**, delete the first sentence so the second sentence becomes the goal. The idea of metrics is good but not to be used to monitor implementation, especially by the private sector. This goal might be moved to an equity element.

2. **Connectedness**
    a. **Issues.** There is a statement that we need to make neighborhoods more diverse. In east county, are you saying that we need more white people? People are going to move where they decide and we don't think the government should be in the business of telling people where they should live. We recommend removing that statement. The implementation of complete communities will provide the interaction this element is after.
    b. **Goals 2.1 and 2.3**. Modify to say it applies to town centers. The policies and actions

in them do not apply to other areas.

c. **Goal 2.4.** Modify to say it is accomplished outside the master plan and development review process.

d. **Goal 2.5** Move to the equity element.

3. **Resilient Economy.**

a. **Name**. Change the name to "Strong Economy". Strong is substantially different than resilient and that is what we need.

b. **Issues**. The sentence in the middle of the first issues paragraph needs to be rewritten since it indicates that causes and effects are the same. The sentence is: "Slow job growth, limited new business formation, wage stagnation, rising economic and social inequity, a high cost of living and doing business, and increasing traffic congestion negatively affect economic activity". Rather say: "The county is experiencing slow job growth, limited new business formation, wage stagnation, rising economic and social inequity, a high cost of living and doing business". Page 21 contains information about the slow job growth and wage decline. It is uneconomical for businesses to locate here except in high cost areas like Bethesda. Also the traffic congestion and the long/uncertain regulatory approval process negatively affects businesses ability and willingness to locate or expand in the county. "

c. **All Goals and Policies in this element**. Throughout the policies in this element, eliminate reference to a good-paying job. While that is the desired outcome it is not something the county can directly control. Rather, the county can take actions which should lead to good-paying jobs**.**

d. **Growth**. The most important goal is not included. That goal/policy is to reduce the cost for building here. The existing SSP is a good start in achieving this goal including:

- Elimination of the school moratorium
- Reducing school impact taxes
- Exempting some properties from both transportation and school impact taxes. The opportunity zone is the most important since federal incentives are provided. The enterprise zone is another vehicle for economically encouraging growth.

e. Goal 3.1. The County streets and roadways will be the primary means of transportation for many years to come and need to be properly maintained and repaired. Poorly maintained streets are a major deterrent to investment and commerce. "Active Living" within a community is promoted when the residents feel pride in their neighborhood appearance, including the streets, and have safe access.

f. **Policy 3.2.1.** The zoning density has a bearing upon the cost to develop. Zoning density goes a long way to setting the value of the land. The policy should be to have lower density by right and provide density bonuses when developers propose features that the county wants. One such feature would be to provide more bedrooms in high rise multifamily buildings.

g. **Action 3.2.1a**. We don't agree with this proposed action.

h. **Policy 3.2.2** Move this to the transportation element. What about other major employment centers, including White Oak?

i. **Goal 3.3**. The idea of the second sentence is good so delete the first sentence. The result of training and education can be better paying jobs and in some cases retaining a job at the same income level. The focus needs to be on education, especially college and adult education. Employers need people with the desired skills. The needed skills can shift over time and people therefore need continuing education. There are also immigrants who need education in English, but that idea should not be included in the plan.

j. **Goal 3.4.** This goal should be deleted since land is needed for all enterprise activities, not just PDR.

k. **Policy 3.5.3**. Move into policy 3.3. Also, in policy 3.5.2 where a key federal facility exists, master plans should encourage nearby development that would provide a synergic relationship. The White Oak Science Gateway Master Plan is an example. LABQUEST is a good example of an organization to encourage the relationship.

l. **Goal 3.6.** The major objective should be to shorten the length of time to obtain regulatory approval. Also in the multiple stage planning process, once an item is approved at one stage it should not be reopened for decision at a later state, which often happens, especially when staff personnel change.

- A policy should be added to review regulations to eliminate unnecessary or outdated ones.
- Delete draft policies 3.6.2 (housing in the wrong element) and 3.6.3 (use technology – if anything this is an action).

m. **Goal 3.7.** Need to also work with other counties, especially for transportation.

4. **Safe and Efficient Travel**

a. **Goal 4.1** Delete the first sentence since it is not a goal. The second sentence is a goal but reword it something like: Plan, design and implement the transportation system to encourage people to use public transit, walking and biking rather than the need to drive.

b. **Policy 4.1.1**. There needs to be a balanced approach to using roads. Some roads will be primarily for vehicles and transit and others will also be used equally by all modes.

c. **Policy 4.1.2**. High quality transit is not defined. The correct term is premium transit. Transit goes between places, not between places and itself.

d. **Policy 4.1.4**. Eliminate rail since it is too costly.

e. **Policy 4.1.6**. Eliminate this policy since it is an operational task and doesn't belong here.

f. **Policy 4.1.7**. Eliminate since it is already covered elsewhere in Goal 4.1

g. **Goal 4.2 and its policies.** The points here are already covered in Goal 4.1 and its policies.

h. **Goal 4.5**. Eliminate this under transportation since it is covered under Element.6. Also, at most one can only reduce greenhouse gases, not eradicate it.

i. **Goal 4.6.** Eliminate since actions dealing with funding priorities and fares don't belong in this document.

j. **Goal 4.7.** Eliminate since it is already covered under Goal 4.1

k.   **Goal 4.8.** This goal is saying to form another COG, but it already exists. Are you proposing to create another COG? Coordination is also needed with Howard County and others counties northwest of Montgomery County.

5. **Affordability and Attainability**
   a.   **Policy 5.1.7.**  The zoning ordinance should be changed to allow increased density when additional bedrooms are built for multifamily units. See the SSP staff report for 10/30/2020 for information that relates number of bedrooms to the revenue the building owner receives.
   b.   **Policy 5.5.12**. The SSP is not the correct vehicle for monitoring growth housing trends.
   c.   **Goals 5.5 and 5.6.** Move these goals to the proposed equity element.

6. **Healthy and Sustainable Environment**
   a.   **Goal 6.1 and polices 6.1.1, 6.1.2 and 6.1.4**. These have already been covered in the complete communities element and thus should be deleted from this element.
   b.   **Policy 6.1.3**. This policy is a mix of ideas that are poorly explained and those ideas should be moved into goal 6.2.
   c.   **Goal 6.2**. This goal and its policies contain multiple poorly written ideas. Many of the ideas are covered under Complete Communities; and Safe and Efficient Travel. Accordingly they should be deleted from here. The idea of action 6.2.1 should be made into a policy, and maybe a goal to increase the building designs to use less energy, less water, and less light and noise pollution. A policy also is needed to deal with reducing the amount of stormwater run-off and the negative effects from it (water temperature, and volume of run-off in a storm). The standards need to address 100 year storms since we are having them several times a decade. There needs to be a policy about retrofitting streams undergoing severe erosion. The other items in this goal should be deleted since they are not something the county can effect ( redesign the electrical, and communications utility infrastructure)
   d.   **Goal 6.3**. Improving health is not something that belongs in this document. It is handled by private industry and much of the regulation is undertaken by FDA and other federal agencies. Congress is the one who would establish policy. The plan should talk about parks and recreation facilities. Health will be improved as a bi-product of the remaining elements.
   e.   **Goal 6.4.** Delete this goal since it is federal responsibility to regulate food safety and private industry to control where it is grown, stored, processes and distributed.

7. **Diverse and Adaptable Growth**
   a.   **Goals 7.1, 7.2 and 7.3** should be deleted since the subject is already covered in under the Complete Communities element.
   b.   **Title.** The title for this element needs to be changed to Agriculture Reserve.
   c.   **Policy 7.**4.3  The government should not be in the business of increasing public awareness, except as part of MCPS education.
8. **Design, Arts and Culture**
   a.   **Goals 8.1 and 8.5**. The county can encourage art and culture in new development

but it should not be part of the regulatory process. The way to do this is create a guide that developers could use if they desire. What is attractive for one person may not be for someone else. Also tastes change over time so regulating it would lock in something that will get dated.

    b.   **Goal 8.2.** This largely deals with parks and that entire subject needs to be part of the Healthy and Sustainable Environment element.

    c.   **Goal 8.3**. This goal talks about the environment and it needs to be part of Healthy and Sustainable Environment element.

    d.   **Goals 8.4 and 8.6.** The design is a function of the private sector not the regulatory public sector and thus needs to be deleted from this document**.**

    e.   This element needs to be deleted since after the above changes, there is nothing remaining.

9.    **Implementation**.

Statements in this section about specific decisions that may or not be made in the future don't belong here.

- **Page 125**. The text in the next to last paragraph about state roads needs to be deleted. The County should not take over control of state roads. The County is unable to adequately fund repair of county roads and adding state roads would require a major tax increase.

- **Page 126.** The two bullets under master plans need to be deleted since our recommendation is to move all actions to an appendix as possible work programs. Employment objectives don't belong in master plans since the government can't control them.

- **Pages 126/127/132-134**. These sections need to be deleted and placed in an appendix.

- **Page 128.** The discussion on facility plans needs to be deleted since the Planning Board reviews them under mandatory review when public facilities are getting ready to be implemented. Master Plans provide guidance before that.

- **Page 131**. Delete the "getting started" discussion since it is setting actions. The previous discussion indicated the Thrive plan sets the vision and not actions.

Thanks for considering our ideas.

Sincerely

Daniel L. Wilhelm
GCCA President

# Greater Colesville Citizens Association

PO Box 4087
Colesville, MD 20914
November 19, 2020

Montgomery County Planning Board
Attn: Casey Anderson, Chair
2425 Reedie Drive
Wheaton, MD 20902

Thrive Montgomery 2050

Dear Chairman Anderson:

There are many good ideas in the draft Thrive Montgomery Plan.  After reading 166 pages, we had a hard time pointing out many goals and polices where we disagree. On the other hand, we also found it difficult to point out the document thrust. Rather, it is more like a collection of ideas from many different people put together with minimal organization and focus. We think that Chairman Anderson's comments in October are largely correct. The comments we provide below are intended to fulfill two purposes: identify proposals that we support or oppose, and provide suggestions for improving the document in terms of organization and focus. We think the suggested improvements will be a good start in addressing the Chairman's concerns as well.

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4. **Safe and Efficient Travel**
   a. **Goal 4.1** Delete the first sentence since it is not a goal. The second sentence is a goal but reword it something like: Plan, design and implement the transportation system to encourage people to use public transit, walking and biking rather than the need to drive.

b. **Policy 4.1.1**. There needs to be a balanced approach to using roads. Some roads will be primarily for vehicles and transit and others will also be used equally by all modes.
c. **Policy 4.1.2**. High quality transit is not defined. The correct term is premium transit. Transit goes between places, not between places and itself.
d. **Policy 4.1.4**. Eliminate rail since it is too costly.
e. **Policy 4.1.6**. Eliminate this policy since it is an operational task and doesn't belong here.
f. **Policy 4.1.7**. Eliminate since it is already covered elsewhere in Goal 4.1
g. **Goal 4.2 and its policies.** The points here are already covered in Goal 4.1 and its policies.
h. **Goal 4.5**. Eliminate this under transportation since it is covered under Element.6. Also, at most one can only reduce greenhouse gases, not eradicate it.
i. **Goal 4.6.** Eliminate since actions dealing with funding priorities and fares don't belong in this document.
j. **Goal 4.7.** Eliminate since it is already covered under Goal 4.1
k. **Goal 4.8.** This goal is saying to form another COG, but it already exists. Are you proposing to create another COG? Coordination is also needed with Howard County and others counties northwest of Montgomery County.

5. **Affordability and Attainability**
   a. **Policy 5.1.7.** The zoning ordinance should be changed to allow increased density when additional bedrooms are built for multifamily units. See the SSP staff report for 10/30/2020 for information that relates number of bedrooms to the revenue the building owner receives.
   b. **Policy 5.5.12**. The SSP is not the correct vehicle for monitoring growth housing trends.
   c. **Goals 5.5 and 5.6.** Move these goals to the proposed equity element.

6. **Healthy and Sustainable Environment**
   a. **Goal 6.1 and polices 6.1.1, 6.1.2 and 6.1.4**. These have already been covered in the complete communities element and thus should be deleted from this element.
   b. **Policy 6.1.3**. This policy is a mix of ideas that are poorly explained and those ideas should be moved into goal 6.2.
   c. **Goal 6.2**. This goal and its policies contain multiple poorly written ideas. Many of the ideas are covered under Complete Communities; and Safe and Efficient Travel. Accordingly they should be deleted from here. The idea of action 6.2.1 should be made into a policy, and maybe a goal to increase the building designs to use less energy, less water, and less light and noise pollution. A policy also is needed to deal with reducing the amount of stormwater run-off and the negative effects from it (water temperature, and volume of run-off in a storm). The standards need to address 100 year storms since we are having them several times a decade. There needs to be a policy about retrofitting streams undergoing severe erosion. The other items in this goal should be deleted since they are not something the county can effect ( redesign the electrical, and communications utility infrastructure)
   d. **Goal 6.3**. Improving health is not something that belongs in this document. It is handled by private industry and much of the regulation is undertaken by FDA and other federal agencies. Congress is the one who would establish policy. The plan should talk about parks and recreation facilities. Health will be improved as a bi-product of the remaining elements.
   e. **Goal 6.4.** Delete this goal since it is federal responsibility to regulate food safety and private industry to control where it is grown, stored, processes and distributed.

7. **Diverse and Adaptable Growth**
   a. **Goals 7.1, 7.2 and 7.3** should be deleted since the subject is already covered in under the Complete Communities element.
   b. **Title.** The title for this element needs to be changed to Agriculture Reserve.
   c. **Policy 7.**4.3  The government should not be in the business of increasing public awareness, except as part of MCPS education.
8. **Design, Arts and Culture**
   a. **Goals 8.1 and 8.5**. The county can encourage art and culture in new development but it should not be part of the regulatory process. The way to do this is create a guide that developers could use if they desire. What is attractive for one person may not be for someone else. Also tastes change over time so regulating it would lock in something that will get dated.
   b. **Goal 8.2.** This largely deals with parks and that entire subject needs to be part of the Healthy and Sustainable Environment element.
   c. **Goal 8.3**. This goal talks about the environment and it needs to be part of Healthy and Sustainable Environment element.
   d. **Goals 8.4 and  8.6.** The design is a function of the private sector not the regulatory public sector and thus needs to be deleted from this document**.**
   e. This element needs to be deleted since after the above changes, there is nothing remaining.

9. **Implementation**.
Statements in this section about specific decisions that may or not be made in the future don't belong here.
   - **Page 125**. The text in the next to last paragraph about state roads needs to be deleted. The County should not take over control of state roads. The County is unable to adequately fund repair of county roads and adding state roads would require a major tax increase.
   - **Page 126.** The two bullets under master plans need to be deleted since our recommendation is to move all actions to an appendix as possible work programs. Employment objectives don't belong in master plans since the government can't control them.
   - **Pages 126/127/132-134**. These sections need to be deleted and placed in an appendix.
   - **Page 128.** The discussion on facility plans needs to be deleted since the Planning Board reviews them under mandatory review when public facilities are getting ready to be implemented. Master Plans provide guidance before that.
   - **Page 131**. Delete the "getting started" discussion since it is setting actions. The previous discussion indicated the Thrive plan sets the vision and not actions.

Thanks for considering our ideas.

Sincerely

Daniel L. Wilhelm
GCCA President

Good Evening

I am writing to you to submit my written testimony for the record for the Thrive 2050 hearing, in advance of my oral testimony. Please see the attached PDF

Thank you,

Michael English
8005 13th Street, Unit 304
Silver Spring, MD
20910

Dear Members of the Planning Board

My name is Michael English. I've lived in Downtown Silver Spring (DTSS)  since 2012, and was lucky enough to be able to purchase a condo in DTSS late last year. Before I get into my detailed comments and concerns, I wanted to thank the planning department for its  bold draft plan on Thrive 2050, and the planning board for allowing me to give my testimony, both in writing and verbally. The opportunity to be heard is deeply appreciated.

I'll get into more detail below, but all of my comments and concerns come down to the same thing. Montgomery County is in the midst of a severe affordable housing crisis, and unless housing supply of all shapes and sizes is added in great number, Moderately Priced Dwelling Units (MPDUs) and other affordable housing support are continued and expanded, and existing affordable housing stock preserved to the greatest extent that is economically feasible,  this county will continue to become unaffordable for all but the most fortunate. That said, I am happy to see many of the wonderful ideas and proposals laid out in the current Thrive 2050 draft, particularly the acknowledgement of the affordable housing crisis, and the support for adding needed supply, including missing middle housing. If you take away only one thing from my testimony, either in writing or in person, let it be that the final draft of this plan absolutely must maintain this strong focus and expand upon it, otherwise this will cease to be the wonderful and welcoming county I have come to love. I would also like to stress that both renter and owner supply must be added. Even in DTSS, condo buildings, and other ownership opportunities near downtown that aren't outrageously priced single family homes are relatively rare, so while rental supply must be added, room must be made for those seeking to purchase  a home as well.

I'm sure I'm not telling you anything you don't already know, but the affordable housing crisis the county faces is severe.  In the last decade, only households making $150,000 or more a year saw an increase in net home ownership in the county, and the household income required to afford the median-priced home exceeds the actual median income, a gap that has steadily widened. Meanwhile, the number of cost-burdened rental households is increasing, particularly in transit accessible areas.

Further, the current Thrive draft itself  notes that unless the county grows its housing supply to make room for the projected 200,000 new residents moving here by 2045, existing communities will become more expensive, less diverse and integrated, and it will be difficult to attract and retain a skilled workforce. Further, this 200,000 number should be viewed as a guess, not a cap. I encourage the county to make room for even more people to the extent trends indicate it is feasible.

You will no doubt hear from others that people "don't have the right to live wherever they want" or, to paraphrase our current County Executive, that they can live in Frederick if they can't afford our county. These arguments are, to be polite, the height of oblivious privilege. The same people saying this no doubt rely on local, often low wage workers to serve them food, staff retail, manage and work in their offices, teach their children, maintain their roads, or any number of other important jobs that don't command the same wages us privileged few are lucky enough to

receive. I simply don't subscribe to the belief that there is no place for people to live near where they work, or at least have reasonable, reliable transportation to those areas. People who claim that others can live further out, and far away from transportation and other important infrastructure either forget this, or simply do not care. Failing to make room for people to live in vibrant, accessible, and prosperous areas is classist, cold, and not becoming of the progressive values that our county, justifiably, has come to stand for.

I am lucky enough to do fairly well financially, and even I have long had fears of being priced out of this region, as have most of the people I know even in my relatively affluent bubble. While my own prospects are currently a bit more stable, I worry for the quality of life of others, and, more selfishly, I worry that the wonderful diverse community I live in will gradually be replaced with a richer, sterile ,and monochromatic populace as everyone else gets priced out. Simply put, I don't want Silver Spring to become "Bethesda East", and there are multiple neighborhoods with similar concerns throughout Montgomery County. While I understand the concern my fellow homeowners have about "protecting their investment" with increased property values, to me, owning a home is meant to provide some sense of financial and residential stability, and the ability to build forced savings through equity. It is not an entitlement to an ever growing return on investment.

In our county, and particularly downcounty, homeownership is increasingly becoming the domain of only the most fortunate. Even if property values go down, which I hope but sadly do not expect them to do, homeowners will by and large be fine. They are scared of the unknown, and I get that, but I'm more worried about the people scared about losing a roof over their heads, or of having a two hour commute to their jobs as they are priced further and further out. Even if median prices don't fall, renter and owner occupied smaller units, whether in the form of high rises or missing middle housing (small apartment and condo buildings, duplexes, triplexes, rowhomes, etc.) would allow for more of these cheaper alternatives to be on the market, making things more affordable for more people, regardless of what happens with the skyrocketing, and frankly ridiculous prices on standalone single family homes.

 While affordability and the lack of a diverse housing stock is a problem throughout the county, I think the example of DTSS is very telling, and the one I can speak best to. The downtown core, which I live on the edge of by the community college, is dense and urban and vibrant, with a diverse housing stock ranging from affordable garden apartments, to small condo buildings like my own, to mid and high rise apartment and condo towers. And then, suddenly and starkly, it ends. Single family homes dominate across Fenton and Spring streets, and even modest half a century old single family homes in neighborhoods like Woodside and Takoma Park easily go for half a million dollars to start, often much higher. That kind of hard line of division of standalone homes directly adjacent to density, and all the transit, shopping, parks, and other amenities that come with it, provides these SFH with a free rider benefit on their property values. With the median price for a single family home in the county being over $700,000, a county primarily made up of single family homes will never be able to provide shelter for the vast majority of the population without stretching budgets to, and past, the breaking point. High rises and MPDU

requirements are wonderful tools, are used fairly widely in  Silver Spring and Bethesda, and I support them and their expansion, as well as other monetary aid and affordable housing requirements. However these two areas cannot bear the burden of supply on their own, the whole county needs to do its part.

Even for a more localized DTSS sector plan to be bold, it needs a strong general plan to support it. Further, in order to truly move the needle on affordability in Montgomery County tactics like adding missing middle housing will need to be deployed county wide. I would urge the planning board to expand missing middle housing into more single family home exclusive zoned neighborhoods throughout our county, particularly in areas accessible to transit, as they can better handle the density, and will help make transit accessible to those who need it most.

Lastly, I'm sure you will hear people complain about the "changing character of neighborhoods" that might be brought about by zoning changes. To that, I offer two responses. One, zoning is not a commandment from the county on what will be built. Single family homes will still be allowed everywhere, and people will be able to stay in their own homes. If the market dictates that SFH be built in a location, that is what will be built regardless of zoning. The "character of the neighborhood" will be preserved unless it was artificially imposed to begin with. If that type of change happens I will shed no tears for such an outcome.

Second, this is, at best, a classist viewpoint, and at worst, a racist one. Historical districts and other types of SFH exclusive zoning are simply the current manifestation of explicitly racist policies such as redlining in the past. Just because people don't mean for something to be racist doesn't mean it isn't so. "Character of the neighborhood" is another way of saying "we don't want 'those kinds of people' living here". It's fear mongering, and it has no place in our country, let alone our progressive county.

In closing, I truly love Montgomery County, and I think I would have trouble ever leaving, but if we don't do something fast, fewer and fewer people will be able to experience living in this place I know and love. We need to do all we can to make sure it stays a vibrant, diverse, and welcoming place for all, and this once in a generation General Plan isn't going to be something we can do over again anytime soon. It will set the framework for sector plans and other more specific zoning decisions for decades to come. If we don't dramatically expand the number and types of homes, rental and owner occupied alike, available now and in the future, it will be nothing short of a betrayal of the principles of progressivity, fairness, equality, and just plain decency we justifiably like to tout. Please don't let that happen.

Thank you,

Michael English
8005 13th Street, Unit 304
Silver Spring MD, 20910

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

Please accept my comments on the Thrive plan for the hearing on November 19.  I would appreciate confirmation from you that my comments have been received.  Thanks.

Brian Ditzler

1225 Noyes Drive
Silver Spring, MD 20910
bditzler@gmail.com
November 16, 2020

TO:        Montgomery County Planning Board
SUBJECT:  Thrive Montgomery 2020 Draft Plan

The walkable, bikeable, transit-oriented "15 minute living" advocated for in the Thrive Montgomery 2050 plan where racial and social equity, economic competitiveness and environmental sustainability are all paramount makes eminent sense and has my full support. What follows are some of the specific reasons for my positive view of the Thrive draft plan.

First, my family and I experienced such a lifestyle when we lived in a townhouse in southwest London, England, for a time during my 35-year career with a major multinational corporation. Our stay in England was fantastic.  We didn't own or need a car then because we could walk or take transit to wherever we wanted to go.  Our two sons took the "tube" (subway) to school, and when station closures occurred, they caught a bus or two.  I took a train to my job west of London, and on weekends and vacation, mass transit allowed us to explore and enjoy the city, the country and even a lot of Western Europe too.

We loved that way of living so much that when we decided to move to this area to take care of elderly parents and to retire, a primary requirement was that we find a house where we could easily walk to stores, restaurants, the library, doctors' offices and Metrorail.   We bought a home in Silver Spring within walking distance of the central business district and have enjoyed living here for 15+ years now.   We are very much looking forward to the Purple Line and various Bus Rapid Transit lines being completed, and ideally Metrorail and MARC expanded too, so we will be able to drive even less than we do now.

I support Thrive Montgomery because it is fact-based and aspirational but reasonable too.  It promotes both environmental resilience and sustainability.  Despite many people wanting to keep life as it is or was in the past, change is inevitable, so it makes sense to move in a positive direction with smart growth that includes planning for people – not cars.  With the shortage of open, buildable land and affordable housing in the county now, we need to allow (and encourage) a mix of housing types in areas near transit, including areas now zoned for single family homes.

The projected increase in people moving to our county in the future, together with already heavy traffic congestion on many of our roads, means far more transit is needed, which also will enable the safe, walkable and bikeable communities that Thrive seeks.  More transit is also needed because numerous studies show expanding highways to lessen congestion works for a small number of years before the increased number of drivers an expanded highway attracts will cause traffic congestion again along with more pollution and more sprawl.   The best way for our streets to handle increased walking, biking and transit safely is to have lower speed

limits and "complete streets", with buses traveling on dedicated lanes to make them faster and more reliable so they will attract more riders.

Thrive recognizes climate change is happening and needs to be mitigated as much as possible. The plan must reduce the environmental impact of growth but also needs to help increase our energy independence as much as possible. This means requiring more energy efficiency in buildings, and greater use of solar in the county on government, school, commercial and residential building roof tops, parking lots and garages, as well as on farm land including the Ag Reserve.

My primary criticism of the draft plan is that it doesn't sufficiently acknowledge the Ag Reserve must benefit the entire county and not just those who live there. One reasonable and necessary use of the Ag Reserve is to accommodate commercial solar farms that comply with appropriate restrictions and requirements such as contained in a text amendment now under consideration by the County Council.

In summary, I think the Thrive Montgomery 2050 draft plan is fact-based and appropriately aspirational but reasonable too, and would bring about the smart growth our county needs. I am pleased to live in a county that recognizes change is inevitable and is planning the steps needed to move us forward in a positive, resilient, sustainable and equitable manner.


Brian Ditzler

Attached is our written testimony for the Planning Board's public hearing official record. Please let me know if you need anything further.

My bet,
Annette Hennessey

**Annette Hennessey**
*Executive Assistant*
Arlington Partnership for Affordable Housing
703-276-7444 main
571-733-9629 direct
703-532-0240 mobile
ahennessey@apah.org
www.apah.org
**4318 N Carlin Springs Road**
**Arlington, VA 22203**

**Arlington Partnership For Affordable Housing**

apah

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Rev. Andrew Merrow

Kathie Panfil

Nancy Rase

Buzz Roberts

Bobby Rozen

Michael Spotts

Andy VanHorn

John Ziegenhein

4318 N Carlin Springs Road
Arlington, VA 22203

703.276.7444

www.apah.org

**Written Testimony for Thrive Montgomery 2050 Update**
**November 19, 2020**

Dear Montgomery Planning Board,

We strongly support the draft Thrive Montgomery 2050 plan as currently written. As one of the region's most productive affordable housing developers, Arlington Partnership for Affordable Housing (APAH) thanks you for the opportunity to testify, and we are excited by the vision laid out in the plan. Although based in Arlington, APAH works throughout the DMV, including in Montgomery County, and we hope to provide more and more affordable housing in the county in the future. The Thrive Montgomery 2050 plan would greatly help us and other non-profit developers to further expand our work into Montgomery County.

One major reason why we are so excited about Montgomery County is because of the high quality of life there, and so we are glad to see such a forward-looking document that is welcoming of future population growth. As we know from the **Metropolitan Washington Council of Government's 2019 housing targets, the region's population and economy is continuing to grow and every jurisdiction** must accommodate new housing development to maintain affordability and diversity. These targets aim for 75% of new housing near transit and 75% affordable to low- and middle-income households. This plan is a positive step towards achieving these goals in Montgomery County. Specifically, APAH strongly supports the following goals in the draft plan:

- Diversifying housing types in single-family areas, especially near transit (Goals 1.1 and 5.1). **Although the county's population continues to** grow, building permits are at historic lows. This is mainly because the county has built out most of its residential zoned land to its capacity. To maintain housing production, the county should consider densifying, especially in single family areas around transit. Doing so is also equitable, because so **many of the county's wealthiest neighborhoods are also single family. These** areas tend to be those that benefited from exclusionary lending policies by the federal government in the mid-20th **century. The county's original** General Plan served to further institutionalize this segregation by making these areas off limits to growth. Allowing for more diverse housing types in these areas, such as duplexes, triplexes, or even small apartment buildings, would begin to break this history of racial and economic exclusion.

- Allow for new housing near rail and BRT corridors (Goal 5.2). The existing and future rail and bus rapid transit lines are some of the most valuable assets that the county has to offer, and we strongly endorse building housing near them. So many APAH residents in transit-oriented projects have benefited tremendously from quick and cheap access to schools and jobs. Projects near transit also allow for the potential of decreasing on-site parking spaces, which can save projects millions of dollars.

- Streamlined development review (Goal 5.1.3.a). Clear and certain county approval processes are critical for delivering affordable housing projects on time and on budget. APAH routinely spends tens of thousands of dollars in legal work during the development review process. With more streamlined entitlement processes for affordable housing projects, this money could instead go towards lowering rents for our residents. We particularly encourage you to consider more by-right development opportunities for majority or 100% affordable multi-family projects.

- Enhanced right of first refusal (Goal 5.5.3). Like other non-profit affordable housing developers in the region, APAH often must compete against much bigger market-rate developers for sites to build. We often pay brokers to help us find sites in this competitive marketplace. Preference from local jurisdictions through right of first refusal policies gives us a tremendous **advantage over the competition and cuts out broker's fees. This helps ensure** that committed affordable housing get built in the places that most need it at the lowest cost.

- Faith-based/non-profit partnerships (Goal 5.1.4). APAH has had great success in building affordable housing projects with faith-based or other non-profit partners, such as the American Legion. We would love to bring this experience to Montgomery County, and welcome county leadership in this effort.

One item that we would have liked to see more discussion about in the draft plan is:

- Affordable housing bonus density, especially near transit. Although we understand that Montgomery County already has an existing MPDU program, we would have liked to see more discussion of how to expand this tool. In particular, we encourage the county to consider raising the 22% bonus density cap for 100% affordable housing projects, particularly those near transit. We would also like to see further discussion on neighborhoods where affordable housing bonus density might be available, such as current low-density areas near transit corridors. Given their complex financing structure, affordable housing projects are difficult and expensive to build no matter the size. Because of this, APAH has found that our biggest projects are also often the most cost efficient. Such projects would not have been possible without generous bonus density programs.

In sum, we think that this draft plan is a significantly positive step forward toward a more affordable and inclusive Montgomery County, and an opportunity **to further the County's reputation as a** progressive community through forward-looking land use planning. We encourage its approval. Thank you for your time.

Sincerely,

Nina Janopaul
President

| From: | Todd Hoffman |
| --- | --- |
| To: | MCP-Chair |
| Cc: | Wright, Gwen; county.council@montgomerycountymd.gov; County Executive Marc Elrich |
| Subject: | Community Coalition Letter on Thrive Montgomery 2050 |
| Date: | Tuesday, November 17, 2020 1:06:01 PM |
| Attachments: | TM 2050 Coalition Response Letter 11-17-20.pdf |

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Dear Chair Anderson and Members of the Planning Board:
Please see the attached letter from a coalition of incorporated municipalities and community organizations regarding Thrive Montgomery 2050.  The signatories of this letter request a meeting with Chair Anderson and Planning Director Gwen Wright, or their designees, to discuss and respond to our questions, suggestions, and concerns.  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

# Community Coalition Letter on Thrive Montgomery 2050

Brookdale, Chevy Chase Village, Chevy Chase West Neighborhood Association, Drummond, Edgemoor Citizens Association, Kenwood Citizens Association, Kenwood Condominium, Kenwood Forest II, Kenwood House Cooperative, Little Falls Place, Somerset House Condominiums, Sumner Village, Town of Chevy Chase, Town of Chevy Chase View, Town of Garrett Park, Town of Glen Echo, Town of Kensington, Town of Laytonsville, Town of Somerset, Village of Chevy Chase Section 3, Village of Chevy Chase Section 5, Village of Friendship Heights, Village of North Chevy Chase, Westbard Mews, Westmoreland, Westwood Mews, Wood Acres.

November 17, 2020

Mr. Casey Anderson, Chair,
   and Members of the County Planning Board
Montgomery County Planning Board
2425 Reedie Drive, 14th Floor
Wheaton, MD 20902

Dear Chair Anderson and Members of the Planning Board:

On behalf of the 27 undersigned incorporated municipalities and community organizations that represent over 33,000 Montgomery County residents, we write to provide comments on the proposed Thrive Montgomery 2050 Plan (the "Plan"), a transformational proposal that will impact all residents, business owners and employees, regional commuters, and visitors for decades to come. We support many of the principles that the Plan espouses, including equity, affordability, attainability, inclusiveness, social connections, environmental sustainability, green space, parks, and walkable communities, which will help our County grow and "thrive" under the guidance of an innovative and responsible Plan, and appreciate the hard work that the Planning Board and planning staff have put into its development. Before the Planning Board approves a Plan for consideration by the County Council to adopt for use by commercial and residential developers as the basis for large-scale community development projects and tax abatement strategies, we strongly recommend that careful attention be paid to and revisions be made based on the suggestions, concerns, and questions outlined in this letter, which reflect considerable community input and discussion.

As discussed in greater detail below, in order to be a living Plan for the County's future, the draft Plan needs to reflect, analyze, and factor in the changed realities of living and working that have been highlighted by the COVID-19 pandemic this year. Among the changes are the new and greater technology and community needs during this time. The draft Plan should take these new realities into account, design for the likelihood that the County's budget will be severely constrained for some years to come, and a 5-year review should be conducted in order to document the lasting impacts stemming from the pandemic.

The draft Plan should also reflect the diversity of communities and neighborhoods that exist throughout the County by defining the different ways in which different types of neighborhoods

can achieve the goals of Complete Communities. Montgomery County is not "one size fits all," and the draft Plan should recognize the County's differences by establishing separate parameters for determining what is a "Complete Community" in the urban, suburban, and rural parts of the County.

Also critical to the success of the Plan is making sure that residents fully support the Plan, and that changes and goals are implemented in a manner compatible with the features and characteristics of local neighborhoods that communities cherish. For these reasons we recommend that the draft Plan expressly recognize and 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 made within their boundaries.

As leaders of the undersigned local governments and community organizations, we feel at a disadvantage to comment publicly given that the *Working Draft* of Thrive Montgomery 2050 is undergoing substantive changes. In the spirit of transparency, we would like to see the red-lined revisions of the draft and reserve the right to make further comments after review.

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**High-Level Executive Summary of Suggestions & Concerns**

I.  **Complete Communities**: we were pleased to see that the draft Plan considered Complete Communities but the inclusion of a map that spotlights which or what proportion of urban, suburban and rural communities are to become Complete Communities replete with Missing Middle housing would be helpful; additionally, there is a paucity of relevant national best practices, omission of any description as to how both incorporated and unincorporated communities will be a part of the redevelopment process that recognizes building and setback authority, a disconnect with MCPS' plans for larger or magnet schools, and a lack of defined minimum amenities and metrics for determining a successful Complete Community with adequate public facilities, green space, transit infrastructure, and affordable housing. In short, the concept of, location of, and metrics for Complete Communities is incomplete.

II. **Financing Capacity**: as stated, there is a lack of acknowledgement of COVID-19's impact on our economy, public revenue deficits, transit use changes, work preferences and lifestyle; in addition, there appears to be an unsupported premise that increased Missing Middle housing stock creates Complete Communities and no attempt in giving equal weight to the importance of job creation, transit, and housing; furthermore, there is a glaring omission of strategies for how public revenue will substantially increase in order to fund decentralized public facilities, small local schools, and transit infrastructure

projects, and a dearth of strategies that attract new industries, companies and small businesses to the County.

III. **Housing Affordability**: we encourage the County to consider increasing and diversifying areas for Missing Middle housing as well as provide more housing for essential workers and 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; however the premise that we will need to house 200,000 more residents is based on pre-COVID-19 assumptions and providing Missing Middle housing is not ipso facto affordable.

IV. **Transportation Access**: we encourage the County to develop a broader approach focused on BRT, specify how transit-centric transportation will be staged given COVID-19 realities, flexibly plan for traffic and technology advancements, integrate with other regional transportation plans, and accommodate demographics including aging, disabled, and young families that cannot use public transit; also, coordination with MDOT will be essential along with the recognition that County residents and visitors will use their cars.

V. **Public Facility Implementation Plans**: the draft Plan will be expensive to implement so the County should specify payment plans for public facilities, pay more attention to how existing disadvantaged and low-income communities specifically will gain better access to transit and other amenities, coordinate with MCPS, Police and Fire & Rescue, and build in equity so that Complete Communities are available throughout the entire County.

VI. **General Implementation Plan**: utilize Master & Sector Plans for implementation as well as design excellence standards; and update the Implementation Plan so that it reflects the realities of COVID-19.

**Appendices A and B** with some requests and questions.

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**Detailed Suggestions, Concerns & Questions for Improving Thrive Montgomery 2050**

**I.     Complete Communities**

A major goal of the draft Plan is to move the County towards a network of Complete Communities.  The brief description on page 52 of this major draft Plan component is inadequate and incomplete.  Residents cannot give feedback on this major component of the draft Plan without a more concrete idea of what constitutes a Complete Community, whether they live in it or help to finance it through their taxes.

While the draft Plan does name Kensington as an example of a suburban Complete Community, there are no corresponding examples of urban or rural Complete Communities. In addition to providing more specifics about each type of Complete Community, it would be very helpful for the draft Plan to provide some additional examples of urban, suburban, and rural communities in the County that are close to being Complete Communities. It would also be helpful to include examples from elsewhere in the United States of how this concept has been applied and how effective it has been, particularly as applied to a county rather than just to a city. As a result of these gaps, the Goals, Policies, and Actions related to Complete Communities fail to answer many questions about how the goals will be achieved.

We recommend that more detailed information about Complete Communities be added to the draft Plan. Some of our specific suggestions follow:

1. **Provide a Map**. The draft Plan should contain information about the geographic location of the three types of Complete Communities. Specifically,
   - provide a map that shows in which parts of the County the urban, suburban, and rural Complete Communities will be located; and
   - clarify whether or not Complete Communities will be located in the Agricultural Reserve. Some information about key physical characteristics of each type of Complete Community should also be provided (e.g., ranges of acreage, desired population size and density, types of housing units and numbers of housing units per acre, mix of uses, amounts of and access to natural green space).

2. **Define Three Types of Complete Communities**. The Goals, Policies, and Actions for Complete Communities should describe what is required to be present in each of the three types of Complete Communities as well as how those areas of the County that will not be part of a Complete Community will be served.

   Many of the Goals, Policies, and Actions relating to Complete Communities are written generally to apply to the entire County; as a result, as presented, they are unrealistic and effectively require considerably more effort and costs. For example, consider, "Policy 1.1.1: ...Every resident should have the opportunity to live, work, play, exercise, shop, learn, and make use of public amenities and services within a 15-minute walk or bike ride." While this policy may be attainable in certain specific areas of the County, it is not feasible or possible for all parts of the County.

3. **Recognize Local Input and Building Authority**. We strongly urge that a policy be added to the draft Plan that gives residents a real role in decisions about changes to the physical characteristics of their neighborhood. There should be another policy that recognizes municipalities' regulatory authority over various physical characteristics of residential

buildings within their borders.  Neighborhoods and municipalities recognize that creation of complete communities will bring some changes to their neighborhoods and that Missing Middle Housing is needed in the County.  However, the planning process must be inclusive and engage all residents in decision making about the future of their communities.

The draft Plan acknowledges that moving the County's land use pattern away from suburban sprawl towards potentially more resilient and efficient Complete Communities will require additional density and other changes to existing single-family neighborhoods.  It recognizes that to make these changes, resident support will be *needed*.
Residents of both unincorporated communities and incorporated municipalities share concerns about maintaining the physical aspects of their neighborhoods that make them suitable for and attractive to an economically, racially, and ethnically diverse range of potential residents.  These aspects include:

- continuation of regulatory authority to adopt ordinances as continuation of existing standards for lot coverage, setbacks, height, conformance to current compatibility requirements for development of non-single-family properties confronting, abutting, and adjacent to properties zoned for single-family residences;
- community-appropriate densities and heights for any building types new to existing single-family communities;
- green space and tree canopy;
- private and/or public areas for recreation;
- limited traffic and safe streets; and
- adequate parking.

The incorporated municipalities, which have regulatory authority over various physical characteristics of their neighborhoods (e.g., setbacks, height, mass, fences, walls, right of ways, residential parking, etc.) seek recognition in the Plan of the appropriateness and continuation of this authority for all residential housing including Missing Middle Housing types discussed in the draft Plan.

In addition, there needs to be a policy in place so that both unincorporated communities and incorporated municipalities are involved in discussions and have a real say about the inclusion of commercial entities within their borders.

Giving residents control over these aspects of the proposed infill development would not interfere with the goals of the Plan -- proponents of Missing Middle Housing state that this housing can be designed and applied in communities so that it is entirely compatible with existing buildings and not really noticeable.  Local authority over these aspects would be consistent with these goals.

4. **Define Amenities and Features of Each Type of Complete Community**.  The draft Plan should spell out the minimal basic and specialized services and amenities that each of the three types of Complete Communities (urban, suburban, and rural) should contain.

5. **Define Metrics**.  The draft Plan should include a policy requiring development of metrics, designed to identify time frames, actions, and results, for each type of Complete Community so that we know what we are striving to achieve, when we have achieved it, and the consequences for not achieving it.

6. **Prioritize Green Space**.  The draft Plan should include a policy which requires that Complete Communities have access to nearby natural green space (i.e., no artificial turf and wherever possible unchanged natural landscape).

   The draft Plan suggests that residents of Complete Communities should have access to nearby green space but does not have a policy or action item to achieve this goal and does not address the minimum size of such space within rural, suburban, and urban areas.  We believe that access to natural green space and the incorporation of a robust tree canopy is important to residents' health and quality of life, even more so as neighborhoods become denser in the process of creating Complete Communities.

7. **Assist Small Businesses**.  The draft Plan should acknowledge the need to make sure small businesses can afford to start, operate, and remain in the community as those communities redevelop.

   Complete Communities intend to provide residents with access to everything they need.  As redevelopment and infill development occurs, affordable retail space is likely to be lost, and with it the small businesses that provide the goods and services needed for daily living.  Retention of existing small businesses and establishment of new small businesses will be important in both economically disadvantaged areas and affluent areas.  \
   The need to retain small businesses and to attract new small businesses may come into conflict with some of the financing measures being considered such as split-rate taxing.

8. **Retain Historic Preservation**.  The draft Plan should include a policy that requires that historic designations for commercial and residential properties located in Complete Communities will continue under current Historic Preservation laws and rules.

9. **Change 15-minute Living**.  Consider modifying the definition of 15-minute living.

   Fifteen-minute living figures prominently throughout the draft Plan as a benefit of achieving Complete Communities.  However, many areas of the County cannot realistically expect to

experience this ill-defined concept.  Also, the draft Plan is unclear as to whether it means a 15-minute walk, cycle, complete transit ride, or car trip, and how this concept can be applied to rural, suburban, and urban Complete Communities (this is one area where examples could be quite helpful).  Perhaps, given the lack of general applicability of 15-minute living across the County and the disconnect between a 15-minute walk, a 15-minute bike ride, 15-minute transit ride, or a 15-minute car ride, the concept of 15-minute living should be changed, and the goals, policies, and actions framed solely in terms of Complete Communities.  The 15-minute living slogan is catchy but does not really work for the County as a whole.

10. **Integrate Environmental Sustainability**.  The draft Plan does not integrate the goals of infill development and environmentally sustainable development.  We recommend that this integration, with metrics, be fleshed out fully to support the County's goal of climate resilience.

11. **Update Infrastructure Policy**.  A policy should be added to the draft Plan regarding the need for updated infrastructure in each instance infill development is occurring.

    Policy 6.2.4 calls for infrastructure improvements to meet climate change challenges.  But the draft Plan lacks a policy that calls for infrastructure improvements to meet added demands placed by infill development on water/sewer lines, electrical lines, communications facilities, stormwater capacity, and other critical infrastructure needs for communities.


## II.      Financing Capacity

A major flaw of the draft Plan is the sparse attention it gives to how the County will thrive economically and how it will pay for the improvements proposed in the draft Plan, given that increasing housing stock does not, in and of itself, lead to job growth or result in a healthier business climate.

While the draft Plan lists the County's sluggish economic growth as its 8th top challenge, it is concerning that the draft Plan does not address finances and the economic feasibility of the proposals, especially given the high infrastructure costs and lack of financing strategies associated with the draft Plan and in light of  the budget shortfalls the County is likely to face for some years due to COVID-19.

The effects of Complete Communities on the County's economic health are uncertain and unproven given the lack of success stories both regionally and nationally.  We recommend that greater attention be paid in the draft Plan toward the creation of incentives and other conditions for economic resilience, job creation, and industry diversification.

Our specific concerns about the financial elements of the draft Plan follow:

1. **<u>Prioritize Economic Growth</u>**.  The draft Plan should recognize economic growth as one of the County's top challenges.

   The county's sluggish economic growth should be listed in the draft Plan as, at least, one of the top 3 challenges the County is facing and job creation should be included as one of the major goals because good paying jobs will be significant in addressing the County's economic inequities.

2. **<u>Consider Economic Resiliency</u>**.  Factors that affect the county's economic health and resilience should be considered when developing the draft Plan's Goals, Policies, and Actions.

   The draft Plan notes that between 2004 and 2019 the number of jobs in the County grew by 5 percent, whereas the job growth in 20 similarly sized counties (defined as those ranking closest to Montgomery County in total number of jobs in 2004) during this period averaged 21 percent (page 22).  The factors that led to the much greater economic growth in these 20 counties should be investigated and the draft Plan examined against those conditions to be sure that its Goals, Policies, and Actions reflect them.

   The draft Plan should include Goals, Policies, and Actions that collectively create conditions that improve the County's economic resilience and diversity and enable the County to thrive and compete in the 21$^{st}$ century.  The County needs to attract new industries and companies as well as retain those it already has.  Potential new industries could include green manufacturing, healthcare technologies, agritourism.

3. **<u>Add Financing Strategies</u>.**  We recommend that the draft Plan include high-level fiscal analyses or associated financing and investment strategies that address how amenities will be added to all communities around the County so that they become Complete Communities.

4. **<u>Share the Costs Between Developers & Residents</u>.**  The draft Plan should indicate how the costs of achieving the goals of the Plan will be shared between developers and residents.

   Constructing Complete Communities will put a great burden on the public treasury to provide (duplicative but equitable) public facilities for all communities.  It is unclear where the vast sums that will be needed to fund the many capital improvement projects called for in the draft Plan will come from.

It is equally unclear how the burden of these costs will be shared between developers, commercial interests and residents. For example, the draft Plan should be clear on whether split-rate financing would apply to single-family properties rezoned for multifamily and/or commercial use. Given the reduced impact taxes and increased recordation taxes to be implemented in the 2020-2024 County Growth and Infrastructure Policy and the sparse detail in the draft Plan about increased recordation taxes and split-rate taxes for underutilized properties, we are concerned that too much of the costs will be imposed upon residents, especially those who would be potentially paying a value added tax on homes that are their primary residences.

### III.    Housing Affordability

A major goal of the draft Plan is  increasing the amount of housing in the County: its target is to locate "at least 75 percent of new housing in mixed use centers near rail and BRT" (page 75), and to increase the County's stock of affordable housing by introducing Missing Middle Housing into single-family neighborhoods within a half mile of rail stations and BRT lines. Given the high land values around transit, we recommend that the draft Plan expand the areas for which Missing Middle Housing can be introduced as well as repurposing certain commercial properties to provide affordable housing.

1. **<u>Increase and Diversify Areas for Missing Middle Housing</u>**. We recommend that the draft Plan increase and diversify the areas where Missing Middle Housing could be located. The draft Plan's focus on putting infill development in existing neighborhoods within one-half mile of rail stations and BRT routes is too narrow and, in most places, the land is expensive, which may not achieve the stated goals. Putting Missing Middle Housing in these neighborhoods is likely to result in some additional housing if the market finds it profitable to build this type of housing there, but it is highly unlikely that the new market-rate housing units will be affordable or attainable by the income cohorts that the Plan seeks to help. Land within a half-mile proximity to primary public transit (Metro, BRT, Purple Line) in many neighborhoods is so expensive in Montgomery County today that the new housing will not even be affordable for families with moderate incomes.
Allowing Missing Middle Housing in neighborhoods that are accessible via other public transit (e.g., Ride On bus and other bus routes on non-BRT routes) could produce additional housing that is far more realistically affordable. This change and expansion of focus and criteria would benefit underserved and disadvantaged communities and populations as the County's housing stock overall is diversified in an upward direction. Additionally, expanding transit services in these neighborhoods seems desirable from an equity standpoint, will make them more attractive communities, and could result in increased investments there.

2. **<u>Provide Housing for Essential Workers</u>**.  We recommend that the draft Plan add a policy and action item of providing convenient and affordable housing for public and other essential workers who provide essential services to communities.  Our teachers, fire fighters, police, and others who directly contribute to the community as well as for other essential workers whose incomes are inadequate for most housing in the County (e.g., grocery workers, trash collectors) need to be able to afford housing near their workplaces.

3. **<u>Leverage Naturally Occurring Affordable Housing</u>**.  The draft Plan should include some Goals, Policies, and Actions regarding naturally occurring affordable housing and adaptive rehousing.
   The draft Plan focuses on creating new housing without adequately considering retaining naturally occurring affordable housing (including possible upgrades to older housing) and repurposing of non-residential properties (COVID-19 has made this particularly relevant).  Further analysis should be done to determine current and potential future naturally occurring affordable housing, structural and system (wiring, plumbing, etc.) lifespans, and cost of retrofitting to extend the lifespan of existing structures.

   This focus and review would give a better picture of the need for newly built housing, as well as data regarding what such housing would cost renters and buyers.  Critically, one likely effect of the COVID-19 pandemic is diminished demand for commercial properties with a greater demand for suburban residential homes; converting certain of the commercial structures to residences, schools, or other public amenities, including co-located uses, should be analyzed as part of Thrive Montgomery.

## IV.    Transportation Access

A major goal of the draft Plan is to change the culture and use of County transportation modes, by getting people out of cars and instead focusing on mass transit and walkability.  This set of goals underpins many of the recommendations in other parts of the draft Plan, such as Complete Communities.  This ambitious goal, while laudable in some respects, does not recognize the substantive disconnect between the County's current transit infrastructure and the transportation network that would be needed to realize this goal.  The draft Plan's focus is both unrealistic, not consistent with the transportation realities of other parts of the DMV, and not appropriate or equitable for many County businesses and residents.

We recommend that the draft Plan's transportation goals and policies be significantly revised to more realistically consider alternative transit options and substantially increase attention to traffic and future flexibility.  Some of our specific suggestions follow.  We believe that the Plan should:

1. **Focus on Developing Transit but with a Broader Approach**.  The draft Plan focuses on improving mass transit through adding bus rapid transit (BRT) routes and to a lesser degree rail service.  Other forms of transit should be considered and incorporated.

2. **Specify How an Evolution from Car-centric Transportation to Transit-centric Transportation Will be Staged and Managed**.  The draft Plan does not adequately consider interim stages between the County's transportation situation as it exists now and as it may become over time.  This evolution and its timing for items such as sidewalk and bicycle route installations or improvements as well as ADUs and infill development's demand for on-street parking are of particular interest given the large investment of public funds that would be needed and the uncertainties in obtaining funding.

3. **Continue to Plan for Traffic**.  The proposed BRT and rail options, even when added to existing Metro and bus lines (and the future Purple Line and planned BRT routes), will not create a transit network sufficient to get most County residents out of cars and hence to reduce traffic.  The County's size, current settlement patterns, diverse population, and demographics require continued planning for vehicles and traffic, and the draft Plan should include strategies to do so.  The County must maintain policy goals that include the realities of vehicular mobility and support acceptable motor vehicle levels of service.  Traffic impacts everyone and planning for motor vehicle traffic still matters.  The draft Plan now ignores the vehicular traffic needs of both small businesses and apartment developers, who tell us that they need to provide parking.

4. **Reevaluate Transit Needs in Light of Lessons from the Pandemic**.  The spread of COVID-19 and subsequent changes to all areas of work, retail, delivery services, and family life are an object lesson in changing needs.  The information already gleaned from changes to travel and telecommuting patterns should be incorporated into the draft Plan.

5. **Provide Flexibility for Future Developments**.  The draft Plan is not poised to accommodate future transportation solutions, which are constantly evolving.  The impacts of conversion to electric vehicles over the next 25 years, growth in private multi-passenger services (e.g. Uber and Lyft), and new forms of transportation that are likely to become available soon, such as autonomous vehicles, are not considered.  Development in areas near transportation hubs will progress and impose new transportation needs, and the ongoing pandemic will change transportation needs in ways that cannot yet be predicted.  The draft Plan should exhibit adequate flexibility to respond to current conditions or adapt to changing conditions over its time frame.

6. **Integrate with Other Jurisdictions from the Outset**.  Despite recognizing these realities, the draft Plan does not adequately consider that State and Federal roads crisscross the County

and will not be subject to the draft Plan, nor the need to integrate the County's transportation modes with other adjacent jurisdictions. It is unclear whether MDOT was consulted with on this draft Plan. Also, County residents and non-residents will still routinely need cars to travel to other parts of the County, to other parts of Maryland, to DC, and to Northern Virginia. Commercial traffic and delivery vehicles will continue to use, and depend, on adequate roadways and traffic control within the County.

7. **<u>Accommodate Many Groups Who Cannot Use Mass Transit</u>**. While the draft Plan focuses on equity, if the County does not plan for cars and insists on 'road diets', one direct consequence would be a significant negative impact on many groups of County residents, for whom the draft Plan would create inequities including:

- Low income residents;
- Senior citizens;
- People with many types of disabilities.

Despite acknowledgment of these groups of people in the current draft Plan, the needs have not been adequately considered and appear to be based on assumptions more than data. Lower income residents often rely on cars to reach multiple jobs in a timely fashion and using mass transit can be more expensive and require significantly more time than making the same trip by car. Similarly, while the draft Plan discusses the County's growing aging population, it does not take into account the many who are not going to bike or walk, particularly in inclement weather, to meet their day-to-day needs. Crucially, the draft Plan does not provide adequately for people with all types of disabilities. Physically challenged residents are mentioned, but only in the context of being able to "roll" to places. Besides mobility, other physical and emotional challenges will always make it difficult for residents to use transit, to walk, or to cycle. The draft Plan does not adequately consider the issues that impact these large groups of people.

8. **<u>Specify the Proportion of the County that Could Evolve into Complete Communities and Better Consider Transportation Needs for the Other Areas</u>**. Many areas of the County will never become Complete Communities, and even those that do will have limits that cannot be circumvented by walking, cycling, or using only mass transit. Community amenities such as libraries, recreation centers, and sports fields are not likely to be included and/or accessible in all areas. It is not realistic to expect families with young children to avoid vehicles for all education, medical, and recreational needs.

**V.     Public Facility Implementation Plans**

Although the draft Plan is intended to be visionary, rather than an exact road map for the future, its success relies on the development of costly infrastructure (e.g., rail, BRT routes, and public facilities such as schools, libraries, recreation centers, and possibly additional emergency facilities, etc.).

Public revenues, at least in the near future, are dwindling for infrastructure projects due to the county's slow economic growth and, more recently, to COVID-19.  Further, reliance on private enterprises or Public Private Partnerships to "build our way forward" may be fraught with unintended financial burdens as well as social and equity consequences, as we have recently learned from the Purple Line.

We have the following specific concerns regarding the discussion and analysis of public facilities in the draft Plan:

1.  **Specify Payment Plans for Public Facilities**.  The Plan should address how the County will pay for decentralized public facilities.

    Throughout the draft Plan there is lack of clarity regarding 15-minute living in general and 15-minute access to public facilities in particular.  The draft Plan encourages co-location of "essential services such as schools, medical clinics, daycare centers, libraries and recreation centers within communities".  While the County in some instances does currently provide for co-location, it has an extensive range of centralized facilities, including swim centers, sports centers, motor vehicle offices, and immersion programs in schools.  The draft Plan appears to be reversing this centralization and sharing of public facilities by calling for decentralizing these services so that residents have 15-minute access.  Regardless of how the Plan ultimately defines 15-minute living, building and operating these decentralized facilities will add significant costs to the County's budget and should be addressed as part of the draft Plan.

2.  **Coordinate with School Facilities and Programs**.  We recommend that the Planning Board work closely with MCPS and the Board of Education to determine if decentralization of middle and high schools, plus the possible termination of magnet and immersion programs, is in the best interest of the County and its students.

    While most elementary schools are a short walk for K through 5th graders, middle and high schools are clustered and today for many students require a car or bus ride.  The decentralization of middle and high schools to accommodate 15-minute living will radically change that model.  Even with compact designs or co-location with other public facilities, under the draft Plan a large number of additional schools will need to be built at a substantial

cost. Further, there is the question of whether magnet and immersion programs should be scaled back or eliminated in the interest of walkability, or made available more broadly, which raises issues of staffing. This is an important policy question for consideration by MCPS and the Board of Education. Related questions regarding athletic programs and the cost of fielding team sports at an increased number of schools as well as the feasibility of acquiring the land that will be needed in already fully built-out neighborhoods also need additional review and analysis.

In light of the County's national reputation for educational excellence and the significance of that reputation to the decision of many companies and families to relocate to the County, adopting the Compact Communities concept requires careful consideration of its impact on the County's educational system as well as whether it will help attract new families and business to the County.

3. **Prioritize Equity**. Public facilities are not equitably distributed throughout the county. The draft Plan should prioritize adding missing public facilities to disadvantaged neighborhoods and upgrading the facilities currently in those neighborhoods.

Transforming existing single-family neighborhoods near rail and BRT transit into Complete Communities will, in many places, involve improving access to public facilities such as libraries, recreation centers, schools, parks, government offices, and natural green spaces, among other things. This improved access may necessitate construction of new facilities. Transforming existing neighborhoods near transit into Complete Communities appears to be the draft Plan's priority. However, some of these neighborhoods are already more amenity-rich than many of the County's disadvantaged neighborhoods. Given budgetary constraints, it seems unlikely that improvements can be made in all neighborhoods simultaneously. To better serve those with greatest need in the County, the priority should be to make improvements in the neighborhoods with the greatest socioeconomic needs and the poorest access to those services.

4. **Coordinate with Police and Fire Protection Services**. We recommend that the Planning Board work closely with representatives of MCPD, County and local Fire Departments to ensure that the Plan does not adversely impact public safety and fire protection services.

Historically, there is a strong relationship between population density and the need for police and fire and emergency services. Decentralization may require expenditures for land acquisition and construction; how it might affect staffing is unclear. We believe extensive additional input is needed from MCPD, MCFRS, and private fire departments regarding urban, suburban, and rural Complete Communities and the most effective, cost-efficient deployment of these services.

**VI.     General Implementation Plan**

1. **<u>Use Master Plans and Sector Plans</u>**.  We strongly urge that zoning changes be established through a Master Plan or Sector Plan approach and not through a global ZTA approach. Implementing changes to housing and uses in neighborhoods through a Master Plan or Sector Plan is more appropriate than other approaches because the County's neighborhoods have such varied characteristics – one size does not fit all.  This approach also allows communities and planners to have a dialog based on the actual experience of living and/or working in a neighborhood as decisions are made about changes to the physical characteristics of the neighborhoods (see item 5 in the Complete Communities section).

2. **<u>Move Design Excellence Criteria to Other Plans</u>**.  Design excellence should be addressed in Master and Sector Plans rather than in Thrive Montgomery.

   The promotion of design excellence in public buildings is a commendable goal but is beyond the scope of a general plan such as Thrive Montgomery.  This goal is not clearly defined in the draft Plan and can be subject to changing trends and individual opinion; for these reasons we urge that it not be imposed on a community through the Plan.  Within each Master or Sector Plan, a panel including relevant experts and community representatives, with input from neighboring properties, should be part of the design excellence process.  Also, design guidelines should not be used in place of zoned density, but rather to enhance the aesthetic appearance of allowed density.

   From a practical perspective, increased costs ascribed to design excellence will present a financial challenge, given the fiscal issues facing the County.

3. **<u>Improve Implementation Timeline</u>**.  The implementation timeline should reflect the realities of obtaining financing to build the new mass transit, bicycle routes, sidewalks, parks, greenways, and decentralized public facilities that will be needed to create Complete Communities across the county and make the Plan a success.  The timeline must include metrics to measure progress and success.

We appreciate your full consideration of these concerns.

Respectfully Submitted,

Robert Goodwin, Jr., Board Vice Chair
Chevy Chase Village

Joan Barron & Shelley Yeutter, Co-Presidents
Chevy Chase West Neighborhood Association

Melanie Rose White, Chair
Citizens Coordinating Committee of Friendship
Heights*

David Barnes, President
Edgemoor Citizens Association

Roger Conley, President
Kenwood Citizens Association

Cecily Baskir, Mayor
Town of Chevy Chase

Paula Fudge, Council Chair
Town of Chevy Chase View

Kacky Chantry, Mayor
Town of Garrett Park

Willem Polak, Mayor
Town of Glen Echo

Tracey Furman, Mayor
Town of Kensington

James A. Ruspi, Mayor
Town of Laytonsville

Jeffrey Slavin, Mayor
Town of Somerset

Marnie Shaul, Council President
Town of Somerset

Susan Manning, Council Chair
Village of Chevy Chase Section 3

Gregory S. Chernack, Council Chairman
Village of Chevy Chase Section 5

Melanie Rose White, Mayor
Village of Friendship Heights

Adrian Adreassi, Council Chair
Village of North Chevy Chase

*Representing the Communities of Brookdale, Chevy Chase Village, Chevy Chase West, Drummond, Kenwood, Kenwood Condominium, Kenwood Forest II, Kenwood House Cooperative, Little Falls Place, Somerset, Somerset House Condominiums, Sumner Village, Village of Friendship Heights, Westbard Mews, Westmoreland, Westwood Mews, and Wood Acres.

cc:    Montgomery County Council
       Marc Elrich, Montgomery County Executive
       Gwen Wright, Director, Montgomery County Planning Department

**Appendix A – Requests**

1. The draft Plan contains a statement that disparages community participation in the planning process: "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." (page 86). This statement is inappropriate and should be removed from the document.
2. The Plan should explain the impact its adoption will have on existing Master Plans and Sector Plans. Will recently adopted Master and Sector Plans be revised to reflect the Goals, Policies, and Action items in the Plan?
3. Some incorporated municipalities (e.g., Rockville, Gaithersburg, Takoma Park) and HOAs will not be impacted by Thrive Montgomery's push to add Missing Middle housing types to existing single-family neighborhoods, potentially creating a disparate impact. Please add a map that shows where Missing Middle Housing could be located.
4. San Diego recently began allowing Missing Middle housing in formerly single-family detached house neighborhoods. It is a large and diverse county, much like Montgomery County. Please include best practices from San Diego in the Thrive Montgomery document.
5. The draft Plan is not well organized. For example, there are Complete Communities and housing items in nearly all of the chapters which makes it very difficult for the reader to get a comprehensive view of what is being proposed for these topics. We urge you to group Complete Communities items together, housing items together, transportation items together, and so forth. Additionally, quite a few of the policies and actions seem too granular for a general Plan and run the risk of becoming outdated; consider dropping them.


**Appendix B – Specific Questions**

Complete Communities:

1. The draft Plan proposes to grow commercial centers that are attractive as headquarters locations for large, multinational corporations, major regional businesses, federal agencies, and small and locally owned businesses. How do these commercial centers fit with the proposed Complete Communities?

Housing Affordability:

1. What housing types will be considered single-family housing? The draft Plan refers to attached single-family, semi-detached single family, and detached single-family housing, but does not define what housing types these terms include. Please add definitions for these to the Glossary.
2. Will HOAs be excluded from ZTAs or will their covenants override?

Transportation Access:

1. Some municipalities in other states are not exclusively dedicating one lane to BRT; rather the lane becomes dedicated during certain traffic conditions. What novel ways could streets be repurposed for BRT?
2. The draft Plan mentions developing a "logistics plan to facilitate increasing volumes of e-commerce-related deliveries." However, downtowns and town centers are slated for more density. How will the increase in delivery vehicles factor into lane reduction, parking decreases, and zero emissions?

Businesses Growth:

1. County Planning staff have stated that corner stores and other businesses will be added to existing neighborhoods, but only on the edges of those neighborhoods, not in the middle of them. How will the placement of these businesses be determined and controlled? How will zoning be altered to allow these uses?
2. What business climate conditions will be created to attract companies and keep them in the County and what types of housing and transportation do employers need?
3. What metrics and consequences will be put into place to ensure minority business owners have equitable access?
4. Has the County considered focusing incentives and commercial land use policies to attract specific industries that take advantage of our unique access to DC so that these industries become synonymous with Montgomery County? Examples might include agritourism (in conjunction with Washington DC tourism and Agricultural Reserve), medical research (benefiting from proximity to the National Institutes of Health and the Food and Drug Administration), and green manufacturing (converting 'strip malls' and department stores to manufacturing centers).

Role of Municipalities:

1. What are the expectations for "partners" in the implementation of Thrive Montgomery? We noticed that municipalities were not listed among the potential partners.

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

I have attached a comment regarding the dilemma of middle-income families seeking homes in highly desirable complete communities and suggest a possible solution known as equity financing.

If you have any questions about the idea please contact me.

Robin A. Barr
Council member, Town of Somerset
robmattles@gmail.com

Middle-income families and complete communities

Thrive Montgomery 2050 seeks to introduce other housing types into corridor areas composed of single-family homes to achieve what is termed "complete communities".

The critique from municipalities argues appropriately that were these new housing types to be built in our communities, middle income folks could not afford them as even these multi-family homes would be out of their price range. It is a generic problem because complete communities as they are envisioned will be highly desirable and so will drive home prices up. (Consider the prices of condos and town houses in downtown Bethesda.)

As Thrive Montgomery 2050 points out the County has a number of creative programs to help low income residents live in homes. These programs do not address the challenge for middle income residents who wish to own their own home in one of the highly desirable corridor communities. The challenge then is in achieving a mix of incomes/wealth in these communities.

What does address that challenge?

Some economists are now advancing a concept called equity financing. The idea is that rather than a loan where all of the risk of depreciation (reduction in value) is on the borrower, equity financing shares the risk. So, the lender takes a percentage of equity in the investment while providing a loan for the remainder of the investment. Then the lender carries some of the risk, but also some of the possibility of gain if the asset appreciates.

(Martin Sandbu in the Economics of Belonging (2020) has a nice account of it.)

Applied to home financing a bank would be a silent partner for homeowners. They would buy maybe 50% of the home and the homeowners would pay a down payment and take a loan for the remainder of the amount.

That means the owners need only 50% of the down payment they would otherwise need, and they pay a mortgage that is only 50% of the mortgage that they would otherwise pay. Middle income residents could afford such a mortgage.

Banks are likely to buy into the idea when the homes are in highly desirable areas. Their asset is likely to increase in value over time. They would be free to sell their share at some later time provided that the equity conditions travel with the sale.

As with most good ideas there is a likely downside to this one. If we make it easier for a larger number of people to buy homes and do not at the same time expand the supply of homes, then we increase demand for the limited stock of homes and so push up prices. The program could in the end price out of the market the very people it is intended to help.

One way of managing the program is to tie it to new developments. So, when a builder/developer constructs multi-family homes (homes that share at least one wall) then the program is offered through the builder/developer to middle income (household income less than X) families. That way supply and demand are managed and any effect on prices should be minimal.


Robin A. Barr
Council member, Town of Somerset
robmattles@gmail.com