

ATTACHMENT 4

**Summary of all Public Comments Received by 12-10-20
Updated for Worksession 8, 2-18-21**

Note: Direct quotes are italicized, summarized comments are not italicized
Draft Plan means Thrive Montgomery 2050 Public Hearing Draft Plan
Page numbers in the “Issue/Topic Area” column refer to the page numbers in the Public Hearing Draft Plan unless otherwise noted.

General comments, overall organization and introduction of the Plan (Revised Draft—Section 1: Why we need a new comprehensive plan for the county)

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	Organization of the Plan and need to make it concise	<p>Various comments about the first fifty pages of the Plan (<i>Introduction, Rationale and Context, Trends and Challenges, Major Themes</i>):</p> <p>The intro section is too long and very difficult to use; some of the topics need to be combined; needs substantial revision to make it clear and set the stage for the goals and policies that follow; use easy to understand wording; need the big important main points to be at the beginning; need clear statements about how the plan will carve a path to the desired outcomes and prevent undesirable and unintended outcomes; need a logically cohesive and compelling complimentary set of policies; reduce redundancies; goals, policies, and actions related to a given topic should be contained in a single chapter rather than scattered throughout multiple chapters. A number of the goals, policies, and actions seem too detailed for a general plan and could also “date” the</p>	<p>Dan Wilhelm for Greater Colesville Civic Association,</p> <p>Scott Plumer for Darnestown Civic Association,</p> <p>Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights,</p> <p>Jane Lyons for Coalition for Smarter Growth;</p> <p>Deborah Ingram,</p> <p>Shruti Bhatnagar,</p>	<p>Staff concurs that the draft Plan needs to be modified as indicated in these comments and as instructed by the Planning Board on October 1, 2020. These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.</p>

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		<p>plan. Suggest removing actions from the Plan and putting them in an appendix. Change or eliminate certain words or phrases.</p>	<p>Chair, Sierra Club Montgomery County, MD; Stacy Silber, Alain Norman, Andy Leon Harney, David Sears, Bethesda, Patricia Depuy Johnson, Michele Albornoz, Quentin Remein, President, Cloverly Civic Association, Linda and Gay Mullings Herb Simmens, Climate Mobilization Montgomery County Chapter</p>	
2.	<p>Evolution of 1964 Wedges & Corridors concept to Web of Corridors & Centers in 2020</p>	<p><i>A reader of the first 50 pages of the report could easily take away the message that this plan is a course correction in an already successful plan, intended only to update in the light of new developments. That is not so.</i></p> <p><i>The great success of the 1964 plan is the wedge - the Agricultural Reserve. But the</i></p>	<p>Benjamin Ross</p>	<p>Thrive Montgomery 2050 acknowledges both the successes and failures of the '64 Plan. It recognizes that the original W&C concept has changed through market forces and planning initiatives to reflect the needs of last 50 years.</p>

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		<p><i>corridors have succeeded by growing very differently from how that plan foresaw them. The 1964 plan envisioned high-density urbanized centers built on greenfields outside the Beltway. Downtown Bethesda and Silver Spring were to remain low-density commercial districts serving the surrounding neighborhoods.</i></p> <p><i>Despite verbal nods to transit, the plan foresaw a county designed around automobile travel. The corridor cities are pictured like denser versions of Tysons Corner, built with wide streets around expressways. The plan needs to explicitly acknowledge the failures that we inherit from that orientation. One of them is office parks along I-270 that are full of empty space.</i></p>		<p>The W&C concept does not exist in its purest form. The footprint of the development today is a hybrid of the original W&C concept and subsequent amendments. It is a reality that cannot be denied. Figure 1 on page 10 of the draft Plan reflects that reality. Just as the '93 Plan reflected where the county was in '93, the “web of corridors” map proposed by the draft Plan reflects where we are in 2020.</p>
3.		<p><i>Our vision for 2050 is a County that has maintained the green Wedges & Corridors structure from the current General Plan rather than being “disappeared” from the current draft document. It is stated that “Thrive Montgomery 2050 proposes to reinforce this web of centers and corridors by focusing growth around transit stations and along the major corridors.”</i></p> <p><i>Where exactly are the corridors and centers? The first time that specific roads are identified as being corridors is on p.76, but it is unclear if these are all the proposed corridors.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association	

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		<p><i>It appears that we are doomed to a County of all corridors and no Wedges. So, what happened to the green Wedges? If the wedges have disappeared, does that mean that the County completely disregarded the principles of the existing General Plan? Does this mean that, no matter what is said in the Thrive Montgomery 2050 plan, the County will disregard this plan as well? We need to go back to the Wedges & Corridors concept which more clearly delineates areas of development.</i></p>		
4.		<p><i>The 1964 Wedges and Corridors General Plan had a profound effect on the growth of both Gaithersburg and Germantown, as did the creation of the Agricultural Reserve. Those planning decisions created the Upcounty as a great place to live and raise a family. The 1964 General Plan and subsequent area Master Plans envisioned a strong commercial corridor along with a balance of residential and retail land use. While the residential and retail components have come to fruition, the balance of commercial enterprise is still lacking.</i></p> <p><i>Given the new direction of the THRIVE General Plan to focus on urban areas with ready access to transit, the question remains as to how the suburban communities in the upper areas of Montgomery County will “thrive”.</i></p>	Marilyn Balcombe for Germantown Chamber of Commerce	

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5.		<i>Our County General Plan should be thinking about expanding its Revenue and housing sources, it should be encouraging as a main emphasis the completion to the Satellite Cities approach in the Wedges and Corridors Plan. It should bolster investment in Germantown, Clarksburg as new major employment resources. The Plan should highly emphasis the County and State commitment to promote infrastructure and services into these areas so as to balance our economic reliance on our Down County Area all the while building more affordable housing within these communities.</i>	Cary Lamari	
6.		<i>We also appreciate recognition of the need to change from “wedges and corridors” to a complete community concept that includes compact development, and we should focus on other factors as well -- such as encouraging healthier living (with reduced reliance on cars), protecting wildlife, limiting light pollution, encouraging local food production via the agricultural reserve, and better managing forest conservation.</i>	League of Women Voters of Montgomery County	
7.		<i>The continuation of the Wedges and Corridors structure of the General Plan - - the current draft creates confusion with its use of the term “web of corridors.”</i>	TAME Coalition	
8.	Relationship to the 1964 General Plan of Wedges and Corridors	<i>The 1964 General Plan and its amendments set goals for the purchase of thousands of acres of parkland, mapped our land uses, and planned for our future. Thrive Montgomery 2050 would best serve</i>	County Executive	The “64 Plan proposed broad goals (total of 10 goals) and relied upon subsequent plans and actions to implement those policies. For example, it relied on the then parks

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		<i>current and future county residents by identifying our needs—amenities in our east county communities, affordable housing in our cost prohibitive communities, and improved transportation to bring our residents closer to jobs and closer to each other, and then lay out a plan to accomplish these goals.</i>		<p>plan and the “park and open space acquisition program” to implement its recommendations for acquisition of parkland.</p> <p>Thrive Montgomery 2050, as a high-level General Plan, identifies the county’s challenges and needs for the next 30 years and proposes policy recommendations that will be implemented through more detailed future master and facility plans and targeted actions. These future plans and actions will identify the specific strategies and locations to provide adequate amenities for our communities, affordable housing, and improved transportation in a most sustainable and equitable manner.</p>
9.	Requests to delay the Project due to the Coronavirus pandemic	The project should be delayed (various timeframes suggested, ranging from two months to until we learn the consequences of the pandemic). People have not been able to participate in the process due to the Coronavirus pandemic; uncertainty about pandemic-related trend for people desiring lower density living continues; residents are coping with major disruptions to their lives and do not have the time to participate fully in the review and comment on this new master plan; the long-term consequences of the pandemic are unknown, people’s preferences may	County Executive, Coalition of incorporated municipalities and community organizations, TAME Coalition, Cary Lamari, Andy O'Hare for EBCA, Ken Bawer for West Montgomery	<p>The Planning Department’s work program and schedule is set by the County Council. Our work program was most recently discussed by the Council during our Semi-annual Report in November. The Council did <u>not</u> change the schedule for the Thrive Montgomery 2050 project. The Council was informed in their decision by several points:</p> <ul style="list-style-type: none"> • It will be a long time before we know the full impact of the COVID-19 pandemic and how it will

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		<p>change; residents of Montgomery County deserve the opportunity to review these changes before the Plan moves on to the County Council; need for in-depth public understanding and input to craft the Vision for Montgomery County for 2050. A 5-year review should be conducted in order to document the lasting impacts stemming from the pandemic.</p>	<p>Citizens Association, Cloverly Civic Association, Robert Oshel, Harold Pfohl, Alan Bowser, Carol Toth, Montgomery County Civic Federation, Kristy Daphnis, M. Allen, Donna R. Savage, Takoma Park Mobilization Environment Committee., Aspen Hill Advocates, Phyllis Edelman, Herb Simmens, Climate Mobilization Montgomery County Chapter</p>	<p>change out our long-term planning framework.</p> <ul style="list-style-type: none"> • Delaying Thrive Montgomery 2050, which is a long term policy document, does not make sense given that many of issues highlighted by the pandemic, such as an increased emphasis on equity and access to affordable housing, existed prior to the current crisis. We need to start laying out the groundwork to be address these ongoing issues and be more resilient in the face of disruptions. • The COVID-19 pandemic has not curtailed community participation in this project. The Planning Department has done a great deal of outreach over the past 18 months. The outreach has continued throughout the pandemic and we believe it has been very effective in reaching both people who typically participate in planning activities as well as people who have not participated in the past. We have conducted multiple virtual community and agency partner outreach activities over the Spring, Summer and Fall to gain feedback on earlier draft goals, policies and actions. This feedback helped to

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				inform the development of the Working draft Plan released in September.
10.	Requests NOT to delay the project due to the Coronavirus pandemic	<i>we cannot delay the work that this document details... If COVID has taught us anything, it is the need to remain flexible and nimble. I would urge you to not chain yourself to a long list of prescriptions. Trust the sector plan process, and the hearings that follow, to do what they are designed to do. I certainly do at this point. Let the planners that come after you in the ensuing decades be inspired by concepts and ideals. Don't shackle them to tightly prescribed parameters... We need to get started now. There is no sense in waiting until some perfect moment arrives and an encyclopedia-like document has been completed. Let's go, let's dig in. Let's begin to THRIVE right now.</i>	Alison Gillespie	Staff concurs
11.	Relationship to the '93 Plan	There are numerous similarities between the 1993 plan refinements and the Public Hearing Draft Plan, but many important protections have been dropped from the PH Draft Plan. <i>The new plan promotes many more desirable paths forward than its predecessors and if implemented take pressure off sensitive and strategic protected areas. Promoting preferred practices is not enough. Harmful practices must be banned or required to meet</i>	Scott Plumer for Darnestown Civic Association	Thrive Montgomery 2050 articulates a long-term vision and a set of goals and policies to achieve that vision. It emphasizes the discontinuance and mitigation of past land use practices that created a pattern of sprawl. The detailed controls and guidelines to prohibit undesirable practices are contained in the regulatory framework including the Zoning Ordinance and other parts of the County Code. The draft Plan contains

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		<i>extremely difficult hurdles to be approved. Promoting infill and compaction near transit is not enough, you also have to protect against sprawl where it is likely to occur.</i>		multiple actions to update these regulations to help address a number of issues resulting from earlier land use practices.
12.	Provision of infrastructure to support new growth	<i>With the passage of the new Subdivision Staging Policy on Monday, November 16 (now called the Growth and Infrastructure Policy), development may proceed without assuring adequate public facilities. Absent a timing or staging requirement to coordinate new infrastructure with new development, we have no way of assuring that public facilities will keep pace with future growth.</i>	County Executive	Thrive Montgomery 2050 recommendations will be implemented through subsequent area master plans, countywide functional master plans and related sectional map amendments, district map amendments, zoning text amendments or other mechanisms approved by the County Council. Developments will be subject to local area master plan compliance and the Growth and Infrastructure Policy (GIP) requirements and guidelines, as amended by future Council Councils. Any specific assurances for timely provision of infrastructure and public services should be analyzed and included in the future master plans and GIP updates.
13.	Lack of discussion of the suburbs or rural areas.	<i>The draft does not explain why this plan omits any discussion of the suburbs or rural areas. Will suburban and large lot rural areas still exist in 30 years, or is this plan proposing that for the next 30 years all development will be compact and dense? In the next draft, please clarify whether this plan still supports the geographic areas of Suburban Communities and the Rural Wedge as part of the future of this County.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The draft Plan Montgomery 2050 proposes to direct all future growth to transit station nodes along major corridors that have the infrastructure and other amenities to support this growth, instead of to rural and other low density areas of the county. See the “web of corridors” graphic on page 10 of the draft Plan. All other suburban and rural residential areas

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		<i>If not, what does the plan support for those geographic areas? The plan should include a schematic map.</i>		beyond the 15-minute walking distance of these transit nodes will continue to exist. The idea of compact development applies to any new construction or redevelopment (upgrade of a strip shopping center, e.g.) in order to better utilize the limited land available for infill development outside of rural and other constrained parts of the county. The Planning Board draft Plan will further elaborate on what is envisioned for suburban and rural areas.
14.	Provide a map of future growth areas	The plan should include a schematic map to clarify whether this plan still supports the geographic areas of Suburban Communities and the Rural Wedge as part of the future of this County. A map that spotlights which proportion of urban, suburban and rural communities are to become Complete Communities with Missing Middle housing would be helpful.	County Executive, Jane Lyons, East Bethesda Citizens Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
15.	Identify new policies v current policies	The draft needs to clearly identify new policies originating in this draft. Right now, it is difficult to tell whether a policy recommendation is brand new or already being implemented.	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Thrive Montgomery 2050 will incorporate best practices in planning policies reflected in recent master plans such as the Bicycle Master Plan as well as brand new innovative policies and action recommendations.

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16.		<i>Support the Thrive draft Plan, especially the goals of compact growth, inclusion, and the corridors. More compact growth will allow for the population increase and support 15-minute living. The 15-minute living concept promotes the growing senior population, reduces auto use, and can be executed in all areas. Inclusion in diversifying neighborhoods is the key to promoting equity, and we should promote a range of housing types to accommodate that. Growth corridors are good for transit and density. Living, working, and going to school with people from different backgrounds is an advantage.</i>	Tina Slater	Staff concurs
17.	Need for an advisory committee	<i>In this time of a pandemic, however, it is difficult to have an interactive dialogue about such issues that deeply impact our communities. Perhaps there could be an advisory committee formed to discuss specific issues that would affect those neighborhoods where Thrive Montgomery would have the greatest impact?</i>	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	Staff believes that the outreach and engagement process employed to get community feedback for Thrive Montgomery 2050 reached a large and diverse audience, especially those who are typically not involved in land use planning. The Plan's detailed impacts on local communities will be discussed during the subsequent master plans which will be main vehicle for implementation of the Plan's recommendations.
18.	Possibility of severely constrained budget in the near future	The Plan should design for the likelihood that the County's budget will be severely constrained for some years to come – something that no number of PPPs will remedy.	Irene N. Lane, Councilmember, Town of Chevy Chase, Todd Hoffman	The implementation of this 30-year Plan over multiple decades will need to adjust to economic and fiscal realities of the current and future disruptions and growth cycles. Thrive Montgomery 2050 already

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			for Coalition of Incorporated Municipalities and Community Organizations	anticipates that new funding sources will need to be identified to help implement its policies and includes several action recommendations to explore those opportunities. The plan's implementation chapter recognizes that the Capital Improvements Program, facility planning and other implementation tools will manage decisions about funding availability at the time of implementation.
19.	Plan's relationship to underlying master plans.	What is the relationship of the new General Plan to the underlying previously adopted functional plans, master plan, and sector plans? Does the draft Plan supersede the underlying plan's goals, policies, and actions? If so, it may be helpful to citizens and the development community to explain this relationship.	Maryland Department of Planning (MDP)	Thrive Montgomery 2050 is an amendment to the county's current General Plan of 1969 as amended by all subsequent master plans. However, as a long-term policy document it does not amend any of the specific recommendations of the underlying master plans already in place. The "Abstract" on page 2 of the draft Plan states, " <i>None of the plan's zoning-related recommendations can be implemented without a sectional map amendment, district map amendment, or a zoning text amendment approved by the County Council.</i> "
20.	All suburban areas to become urban?	<i>The plan seems intent on transforming Montgomery County, except for the Agricultural Reserve, into a more dense urban area rather than the suburban</i>	Robert Oshel, Silver Spring	Thrive Montgomery 2050 does not recommend eliminating suburban and rural areas. It recommends allowing more diverse housing types near transit stations to meet its

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		<i>environment that led us to decide to live in Montgomery County.</i>		housing affordability, climate change, equity, and environmental sustainability goals. Thrive Montgomery 2050 also recommends providing neighborhood amenities within suburban and rural areas closer to residents' homes to increase access to these services and reduce driving for suburban and rural residents.
21.	Overall density caps for master plans	<i>The concept of overall density caps for master plans should be done away with within the general plan. Markets already regulate density, a cap set by available infrastructure gives legislators an avenue to prevent population growth. If infrastructure becomes overburdened then the solution is to improve the infrastructure rather than limit the ability of new residents to move to an area.</i>	Michael Dutka	Staff believes that the draft Plan should not constrain underlying master plans from determining the most appropriate tools for planning and managing the county's growth. The determination of maximum growth in each master plan area is a useful tool to direct growth in desirable locations and help estimate the long-term needs for infrastructure and public services to support that amount of growth. The county's Growth and Infrastructure Policy is another tool to manage interaction between desirable growth and the provision of infrastructure.
22.	Need for updates of the Four Corners Master Plan and the Kemp Mill Master Plans	<i>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.</i>	Sharon Canavan for Northwood Four Corners Civic Association (NFCCA)	Thrive Montgomery 2050 will serve as the foundation to inform future master plan updates. Its role is to provide high-level policy direction that will be implemented in a more detailed way by master plans that respond to the needs of specific communities.

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23.	Local municipalities should continue to retain regulatory authority over building regulations for all types of residential housing within their jurisdictions	<p>Need to make sure that residents fully support the Plan, and that the Plan is implemented in a manner compatible with the features and characteristics of local neighborhoods that communities cherish.</p> <p>The draft Plan should expressly recognize and state that local municipalities will 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.</p>	Coalition of Incorporated Municipalities and Community Organizations; Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights, Irene N. Lane, Town Councilmember, Town of Chevy Chase	Although Thrive Montgomery 2050's recommendations will not apply to the municipalities that have their own planning and zoning authority, the Plan sets a common vision for the entire county and hopes to work cooperatively with all jurisdictions within and outside the county to achieve our common goals and aspirations. .
24.	Support for major concepts of the Plan	I applaud the shift from preservation to creation of a better place, which improves quality of life for all; and to plan for the interests of the entire county, not insular neighborhood interests; shifting from planning for cars to planning for people; changing equity in schools to equity in the larger community; and removing the emphasis on single family homes to create a wide range of housing options.	David Sears, Bethesda	Comment noted.

PREFACE

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	With most of Montgomery County’s available land built out, we need to accommodate the projected new population growth of 200,000 people over the next 30 years. The way we think about growth needs to change. We need to reconsider sites where growth was previously not deemed possible. We need to use new growth and redevelopment to create places with greater social capital and connectedness among residents from different backgrounds. (P. 6)	<p>The Preface states that “...we need to accommodate the projected new population growth of 200,000 people over the next 30 years.” This is presented without evidence. Who is projecting this population growth, and what are the underlying assumptions for this projection? The plan treats population growth as an expectation, rather than as either a desired goal or a potential problem. The plan assumes we have no control over our own destiny. If it is assumed that population growth will occur, then it is reasonable to plan to limit sprawl and concentrate growth. Were residents surveyed on their opinion? Would a higher population lead to a lower quality of life, regardless of where in the County they live? Would current residents prefer to set goals of sustainable growth including sustainable population growth, sustainable economic growth, sustainable/increased natural resources protection, and sustainable/increased quality of life?</p> <p><i>WMCCA recommends gathering citizen input on this issue, perhaps with a county-wide survey of residents. And, of course, a survey should be crafted so as to not lead to a desired response.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association, Herb Simmens, Climate Mobilization Montgomery County Chapter	<p>The estimate of population growth of approximately 200,000 people by 2045 is based on the Metropolitan Washington Council of Government’s (MWCOG) long-term cooperative forecasts for all jurisdictions in the Washington DC region. Population forecasts are developed through a collaborative process involving MWCOG and all jurisdictions in the region.</p> <p>Montgomery County along with other jurisdictions in the region with expected future population growth proactively plan for the expected future growth to make sure it is done in a sustainable manner consistent with the jurisdiction’s vision and aspirations. Putting artificial limits on growth is neither practical nor desirable for a number of reasons. For example, since we cannot stop people from coming to this region, limiting growth in the county will make housing increasingly more expensive and exacerbate inequities and other issues. Additionally, communities with population decline also typically experience economic decline.</p>

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2.	...The way we think about growth needs to change.” (P. 6)	<i>WMCCA Comment: We agree. The focus should be on sustainable growth, not simply growth, given that we have finite resources (both natural and economic). Instead of saying, “The way we think about growth needs to change,” which is true as far as it goes, we should make a more declarative statement such as, “We need to think in terms of sustainable growth. Sustainable growth is defined as growth that both enhances the quality of life for residents but also enhances the environmental health of our remaining natural areas.” For each “item” in the plan, is the above reflected? See the UN’s Sustainable Development Goals (https://en.wikipedia.org/wiki/Sustainable_Development_Goals)</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs that all growth must be sustainable.
3.	Growth projections	<i>The plan projects that we will need to accommodate 200,000 people in the future, we need to be careful that this projection does not become a cap... Specific projections on future population numbers should be removed.</i>	Michael Dutka	The future population projections are estimates only, not a cap. They are updated periodically to reflect the latest data to prepare for the estimated growth and adjust our planning framework, if needed.
4.	The Plan recognizes that our quality of life depends on the ability to attract and retain employers and the employees they need.	<i>WMCCA Comment: Change to read, “The Plan recognizes that our quality of life depends not only on the principle of full employment with living wages, but also on maintaining and enhancing our environment to provide clean air and water, natural areas for plant and animal life, and passive recreation.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

INTRODUCTION

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	WHY UPDATE THE GENERAL PLAN (P. 11) "... we also are struggling to attract businesses, grappling with a legacy of racial and economic inequities, and fighting to protect the natural environment."	<i>WMCCA Comment: What is the evidence that we are struggling to attract businesses and why is this a problem? Simply saying that we lag behind other jurisdictions such as Fairfax in the number of businesses attracted in a given time frame does not necessarily make this a problem if the overriding concern is sustainable growth.</i>	Kenneth Bawer for West Montgomery County Citizens Association	There is plenty of evidence, documented by the research and studies conducted by the Planning Department as well as outside sources to demonstrate that the county has been struggling with attracting jobs for some time.

PLANNING CONTEXT

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	Trends and Challenges			
1.	Incomplete information	<i>In the discussion that follows, the portrait of Montgomery County is not always complete, and the identified problems are without context, even though these problems are found throughout the country. It would be helpful to know whether the County is doing better or worse than the rest of Maryland, the region, and/or comparable counties throughout the country. This introduction needs more context and more facts, so that the County can more easily assess its weaknesses and strengths, and then address them.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Trends and challenges section is based on a series of other reports and documents (see the 2019 Montgomery County Trends: A Look at People, Housing and Jobs Since 1990, January 2019 , Also see a summary presentation of the Trends report and the February 2020 Thrive Montgomery 2050 Issues Report) that provide more detailed data and references to support the statements in the draft Plan.
2.	Need to identify the financial challenges posed by the recommendations of this Plan	<i>It is essential that Thrive Montgomery 2050 identify the financial challenges posed by the recommendations of this Plan. During the last 12 years, growth was supposed to accompany the massive up-zoning of the County – and nothing happened. There is no analysis here of what the impediments are to businesses locating here. We are zoned for millions of square feet of new office, we have at least 10 million square feet of vacant commercial that's been sitting here since the onset of the last recession so space is not the problem, rents are not out of line regionally, and taxes on new development are possibly the lowest in the region.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Montgomery Planning has conducted research and studies to document the economic challenges facing the county (Montgomery County Trends: A Look at People, Housing and Jobs Since 1990, January 2019; Montgomery County Retail Strategy, September 2017; and Office Market Assessment, Montgomery County, MD, June 2015) The draft Plan highlights challenges the county faces that have been identified in earlier studies and proposes broad policy recommendations to set the stage for the next detailed level of analyses

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				and actions, including the financial implications of implementation. For example, the draft Plan includes a policy about reusing underutilized office space; this policy will shape further work to determine specific solutions.
3.	Affordable housing needs to be balanced by better paying jobs	<i>The Argument for Change section characterizes the General Plan update as residential and transit environmental oriented, without adequately addressing the critical need to integrate employment planning in order to address the income side of the housing cost/burden challenge. The focus on residential identifies the challenges and solutions as: i) limited land available for production due to current zoning; ii) cost burdens and equitable access to ownership and amenities as a function of supply limitations, and iii) increasing the younger population for economic vibrancy.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The draft Plan includes a dedicated chapter focused on improving the county's economy and growing job opportunities for county residents.
4.	How the Plan will be funded	<i>All prior plans have recognized that their recommendations should be considered within the County's ability to provide the necessary funding, albeit over a long period of time—30 years. Funding will be addressed in the financial impact statement that the County Executive is required to prepare within 60 days of the Planning Board's transmittal of its draft to the District Council. It is difficult for OMB to quantify the fiscal impact of this General Plan. It is not clear if</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Thrive Montgomery 2050 does not specify its implementation costs because the full range of actions to implement its recommendations cannot be determined today. Other tools and actions will be added to the list as more detail plans are developed to flesh out its recommendations. Therefore, any attempt to determine the full cost of the plan now will be an incomplete exercise

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		<i>the implementation plan will have more detail. The fiscal analysis of this draft appears to involve both additional costs as well as some possible revenue impacts.</i>		
5.	Need for more data	<i>It's unclear why the median household income declined (e.g. are more people retiring, are more lower income households moving into the County, has household size declined?). Understanding the answers to these questions might lead to different definitions of problems to be solved. Have the incomes of County residents over the last 10-20 years skewed in a different direction from incomes in surrounding counties? What is the mismatch between jobs available and the skill level of residents?</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Montgomery Planning has conducted research and studies to document the existing conditions and trends. See Montgomery County Trends: A Look at People, Housing and Jobs Since 1990, January 2019 and other studies available on the R&SP Division website .
6.	The county's overall diversity is not reflected at the neighborhood level. Our neighborhoods are largely separated along income and racial lines (ATTACHMENT 1), which has far-reaching implications for people of color at the lower-income levels as well as the county as a whole. This geographic separation also keeps people of different ethnic/racial and economic backgrounds from interacting with each other as neighbors on a daily basis outside of work. (Trends and challenges, from the 6-11-20 staff report, page 6)	<i>Is this different from any place else in the region? How do we compare? How do Park and Planning and zoning policies which focus on expensive high-rise development around metros continue to foster economic and racial segregation? (OMB: It would be useful to have maps that show income distributions)</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The draft Plan acknowledges that past planning practices have contributed to current state of inequity and geographic segregation of the county's neighborhoods along racial and income lines. This is a problem throughout the DC region and other parts of the United States. Thrive Montgomery 2050 elevates equity as one of three of the Plan's major outcomes, and proposes to address racial justice and inequity through a number of goals and policies.
7.	The county's demographics are changing in other ways as well. For example, the percentage of householders living alone	<i>How much of this is rooted in the millennial wave having hit strong economic headwinds that studies show have delayed</i>	County Executive, 8-14-20 (This	Please see Montgomery County Trends: A Look at People, Housing and Jobs Since 1990, January 2019 ,

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	has increased from 7% in 1960 to 25% in 2018 (ATTACHMENT 2). This trend has huge implications for the kind of housing that is needed in the future as well as services and amenities to support a different mix of household types in the past. (Trends and challenges, from the 6-11-20 report, page 6)	<i>marriage or other committed relationships and child-bearing? It's not safe to extrapolate the increased percentage of people living alone as a permanent condition, when it may only reflect a delay in family formation.</i>	comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Also see a summary presentation of the Trends report at https://www.arcgis.com/apps/Cascade/index.html?appid=f02d34e190f54db4bd1d584b94a8482c
8.	1. The county is growing at a slower rate than in the past, but it will still add more than 200,000 residents in the next 25-30 years. (P. 13)	<i>Trend 1. It should be explained why the first identified trend (adding 200,000 residents over the next 25-30 years) is happening, as well as make the argument for why it is good for our economy and climate goals that this trend is happening in Montgomery County.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
9.	2. The amount of unconstrained land available for growth is very limited. The county must shift its focus to redevelopment and reuse of underdeveloped land, which requires a different set of public policies and approaches to growth than those that have guided the county over the past decades.	<i>WMCCA Comment: What does "underdeveloped" land mean? As written, the implication is that it is a mistake to have lower density land because there is money to be made by overdevelopment. We disagree with that premise. The county must shift its focus from growth which benefits primarily developers to only allowing growth either 1) in those areas where more environmental damage (e.g. to stream water quality) will not be inflicted, or 2) in areas which are designated as stormwater control zones which require, for example, containment of stormwater from 100 year (or greater) storm events</i>	Kenneth Bawer for West Montgomery County Citizens Association	The Plan states that there is less land available for development today than in the past, so future development will need to occur as infill and redevelopment of existing sites. Underdeveloped land means the land is already developed under current zoning but could accommodate additional development. Redevelopment of already developed land is generally considered more sustainable and therefore more desirable than development of virgin land.
10.	5. The county is becoming older. The aging population may put downward pressure on household incomes. ...An	<i>WMCCA Comment: The baby boom bubble of older people is a temporary phenomenon. Expenses such as "retirement</i>	Kenneth Bawer for West Montgomery	Please see the 2019 Montgomery County Trends Report ; Older Adults Housing Study , 2018; and the

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	aging population, without a commensurate increase in younger workers, means lower average household incomes and changing needs for social services.	<i>programs for old people” may be more than offset by the lower need for public education expenses.</i>	County Citizens Association	February 2020 Thrive Montgomery 2050 Issues Report) that provide more detailed data and references to support the statements in the draft Plan.
11.	7. We are not producing enough housing in accessible locations to meet our needs. (Page 21.)	<i>The MDOT MTA supports the inclusion that the development of a new bus rapid transit network should be complemented by land use and zoning changes to create more attainable and affordable housing along those corridors. Additionally, identifying and referencing the relationship between reliable and efficient transit and affordable housing is significant.</i>	MDOT	Comment noted, no response needed.
12.	8. Recent sluggish economic growth requires that the county strengthen its competitive advantages in the global economy.	<i>WMCCA Comment: The emphasis should not be on job growth, but rather sustainability and quality of life. Fairfax County emphasized attracting more businesses for job growth (to “broaden the tax base”) and look at what happened. Taxes never went down, and the only ones who benefitted were landowners, realtors, and builders, not the average citizen.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The draft Plan contains numerous goals, policies and actions focused on increasing sustainability and quality of life, in chapters such as Complete Communities, Sustainable Environment and Adaptable Growth.
13.	11. Declining trends in public health and well-being indicate a growing need for a healthier more active lifestyle. (Page 24)	<i>The MDOT MTA supports the attention paid to the intersection of public health and transit.</i>	MDOT	Comment noted, no response needed.
14.	12. Climate change threatens all aspects of life. (P. 24.)	<i>Page 23, Trend 12. It would be helpful to identify which climate change impacts Montgomery County is projected to be the most at-risk for.</i>	Jane Lyons for Coalition for Smarter Growth	The County’s Draft Climate Action Plan, to be released in December, will identify the climate change hazards for which Montgomery County is most at risk. This information can be incorporated into Thrive Montgomery 2050. Thrive Montgomery 2050 lays out long-term

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				adaptation ideas to be more resilient to the impacts of climate change.
15.	Why do we need to accommodate projected growth.	<p><i>The last major revision to the master plan was in 1964 and there were eight public hearings. Most residents have not experienced a master plan revision in their lifetime and do not even understand the significance of a General Master Plan.</i></p> <p><i>Unfortunately, the County has been overtaken by decisions that have resulted in urban sprawl.</i></p> <p><i>The general master plan and Cloverly Master Plan have served the residents well.</i></p> <p><i>Can a development plan create desirable places or make us economically resilient? Probably not!</i></p> <p><i>Why should we be growing the County at all? Build it better! Our schools need improvement, the public transportation system needs improvement, there are a lot of vacant buildings in the county, improvement of aging utility systems, etc. Much of the unconstrained area is land that is not buildable. Have you considered a Net Zero Growth Option?</i></p> <p><i>Why is infill required? Why expand urban sprawl?</i></p>	Quentin Remein for Cloverly Civic Association	<p>These comments are based on the staff's PowerPoint presentation to the Planning Board on October 1, 2020.</p> <p>The estimate of population growth of approximately 200,000 people by 2045 is based on the Metropolitan Washington Council of Government's (MWCOG) long-term cooperative forecasts for all jurisdictions in the Washington DC region. Population forecasts are developed through a collaborative process involving MWCOG and all jurisdictions in the region.</p> <p>Montgomery County, like other jurisdictions in the region experiencing population growth, must proactively plan to direct that growth to ensure the county can avoid future sprawl. Infill and redevelopment take advantage of sites that are already built, which minimizes sprawl development on greenfield sites and leverages infrastructure already in place.</p> <p>Thrive Montgomery 2050 promotes providing a variety of housing choices to meet different households needs.</p>

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		<p><i>The development changes have already been done under the existing Master Plan. Why is more urban and growth needed? Why can't this be done under the current plan?</i></p> <p><i>Why congest corridors with urban growth? The current master plan provides all these types of housing</i></p> <p><i>First-generation immigrant residents often seek out and feel more secure and comfortable in communities of their ethnic background. Not everyone sees diversity as their strength.</i></p> <p><i>A new revamped Master Plan is not required if we accept Net Zero Growth and make incremental changes to the plan to offer more possibilities to people without requiring everyone to give up their cars and housing choices. Covid has made it clear that many people can work at home reducing rush hours, and that urban lifestyles make control of pandemics more difficult.</i></p>		<p>The spread of COVID is not necessarily linked to density but design.</p>
16.	Planning contexts and challenges	<p><i>Additional planning contexts and challenges should include: 1) Montgomery County's racial and economic segregation and 2) Montgomery County's greenhouse gas emissions by sector, and how both of these trends have changed over time.</i></p>	Jane Lyons for Coalition for Smarter Growth	<p>These comments will be discussed further during the Planning Board worksessions.</p> <p>Additionally, the county's Draft Climate Action Plan being released in December will include detailed</p>

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				analysis and data about greenhouse gas emissions by sector.

A PLAN TO THRIVE

No.	Issue/Topic Area	Comment	Commenter	Staff Response
Rationale and Context				
1.	Ag Reserve must benefit the entire county	<p><i>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.</i></p> <p><i>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.</i></p>	Brian Ditzler. Silver Spring	<p>Staff concurs with the comment about acknowledging that the Ag Reserve is for the benefit of the entire county.</p> <p>The proposed solar farm zoning text amendment is undergoing a separate review process outside of the scope the General Plan Update process.</p>
2.	Figure 20: Pike & Rose in White Flint, before and after redevelopment. (P. 34)	<p><i>WMCCA Comment: The redevelopment of the 8.78-acre shopping center site with housing, shops, offices and open spaces reduced its stormwater runoff by 77%.”</i></p> <p><i>This is a misleading “victory”, since the Pike and Rose site before development was mostly just a large parking lot. The implication is that we need higher density development to reduce stormwater runoff. What is needed is more stringent stormwater control regulations and elimination of waivers.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. The graphic is provided to illustrate the benefits of redevelopment, which can provide more up to date stormwater management improvements where none existed before.

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3.	Rural communities.	<p><i>Proposed Addition to the introductory pages of the general plan:</i></p> <p><i>Communities outside of the sewer envelope represent a viable, desirable, vital, wholly appropriate, important type of development, place making, and way of life. Rural living is resilient, healthy, equitable living in a sustainable, harmonious coexistence with the natural environment and heritage sites. Stewardship of all ecosystem components, especially regionally critical systemic components such as native plants, watersheds, groundwater and soils is the prime guiding factor in planning human activities in Rural Communities. Curation of heritage sites and their surrounds is an exceptional feature of Rural Communities. Open spaces, low levels of impervious surfaces, and low occupancy densities span the entirety of Rural Communities. Rural Communities strive for sufficiency in production and consumption of water, food, energy, and waste disposal, first and foremost with local resources.</i></p>	Scott Plumer for Darnestown Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
4.	Rural communities.	<p><i>[Submitted] two must have items for the proposed new plan simply titled “Two Must-Have Items”. The first item seeks to control development and traffic outside the sewer envelope to protect the environment and reduce sprawl. The second item seeks acknowledgement of Rural Communities as a viable, desirable, vital, wholly</i></p>	Scott Plumer for Darnestown Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

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		<i>appropriate, important type of development, place making, and way of life.</i>		
5.	Lack of attention to mid-county and upcounty areas.	<p><i>One example of the failings in this plan is the lack of respect to the lack of equity between the up County, Mid County and the Down County. Traditionally in the Wedges and Corridors Plan it put emphasis in the urban core, the satellite cities and chose to protect suburbia and our semi-rural and rural areas. This Plan focuses on specific transit corridors most within the down county area and promotes the lion's portion of investment in perpetuity or at least 30 years into these areas...</i></p> <p><i>Today and for the last couple of decades our County has invested much in re-inventing Silver Spring and other down county areas because as the Down County goes so does Montgomery. These efforts however have put a strain on the rest of our County. By supporting the up county in an effort to make it a major economic engine for the County and the State we balance our needs for economic growth and with that balance we also create balance for some of the transportation needs of our County by reducing commute time and creating jobs closer in for many residents.</i></p>	Cary Lamari	The draft Plan proposes to update the pattern of development already established by the W&C concept and as amended by subsequent master plan amendments. It proposes future growth where it can be supported by the current infrastructure and transit, but it does not ignore other areas of the county. The idea of Complete Communities will require significant investment in existing suburban and rural communities to make them more desirable place to live and work. It recommends new transit to places of employment that currently do not have transit.
6.	Support major concepts of the draft Plan.	<i>Equitable housing and food access, environmental protection, and an inclusive, vibrant economy are critical to a resilient</i>	Alex Keller	Staff concurs.

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		<i>future for our communities. In particular, I support the prioritization of walkable and bikeable spaces, decreased reliance on car transportation, public transit accessibility of affordable housing, and an overarching ethic of environmentally responsible development.</i>		
7.	Three Major Outcomes of the Plan. (P. 36)	<i>The text on page 35 covering the three overarching outcomes should be deleted since these outcomes are the three major challenges.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

Major Themes

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1.		<i>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.</i> <i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
2.	Three Major Outcomes of the Plan. (P. 36)	<i>We believe the major themes of THRIVE are accurate descriptors of where the county needs to move over the coming decades. THRIVE advocates for a robust future that includes compact development, creation of diverse neighborhoods to promote racial justice and equity, growth concentrated around transit, a wider range of housing options throughout the county,</i>	Shruti Bhatnagar, Chair, Sierra Club Montgomery County, MD	Comment noted, no response needed.

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		<i>transportation that focuses on moving people, not cars, and eradication of greenhouse gas emissions. Equally important is the vision of complete communities connected also by green corridors. These corridors serve as critical natural infrastructure because they increase resilience to the impacts of climate change and protect water quality.</i>		
3.	4. Three Major Outcomes of the Plan.	<p><i>Page 36. The three outcome statements are a mixture of expected outcomes and background information. Given their importance we suggest the statements be rewritten as follows:</i></p> <p>Equity: <i>'All residents have equal access to attainable housing, healthy foods, employment, transportation, education, safe, healthy and complete communities and more.'</i></p> <p>Economic Health: <i>Our well-being depends upon a having a diverse, resilient and competitive economy supported by a healthy mix of large and small employers and growing federal campuses, whose talents attract entrepreneurial enterprises, all with a diverse and skilled workforce.</i></p> <p><i>Others</i></p> <p>Environmental Resilience: <i>Montgomery County will reduce its GHG emissions by 80% by 2027 and 100% by 2035 while supporting the removal of large quantities of carbon dioxide from the atmosphere. The county will make its</i></p>	Herb Simmens	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

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		<i>natural and infrastructure systems as resilient as possible by climate proofing homes, businesses, and all public and private natural and constructed systems and property. The county will support a wide variety of peer, professional and community support and connectedness services to minimize the physical, social, economic and psychological harms resulting from increasingly severe direct and indirect climate impacts.</i>		
5.	Complete Communities through compact form of development and urbanism. (P. 37)	<i>Dense development with ready access to Metro stops makes a great deal of sense. But value of such property is so great; how do you incorporate parks, trails and open space? And by the way, how much of that is coming into existence as a result of the incredibly dense development occurring in downtown Bethesda?</i>	Harold Pfohl, Sumner Village	The need for local parks, trails and other public amenities is determined during the local master plan update process, which will be guided by the updated General Plan. Open space is also a part of the requirements during the development process.
6.	<i>Page 37. "This additional density will require change in existing single-family neighborhoods through the introduction of 'missing middle' housing, such as duplexes, triplexes, townhouses, live-work units and small multi-family structures in areas where a moderate degree of intensification is appropriate."</i>	<i>In addition to small multi-family structures, this section should also identify mid-rise multi-family structures as desirable along major transit corridors and high-capacity transit centers.</i>	Jane Lyons for Coalition for Smarter Growth	Staff concurs. The scale of new construction in each location along major transit corridors will be determined through a more detailed analysis of its location, context and transition to the surrounding residential neighborhoods during subsequent local master plan amendments.
7.	Corridors are the place for new growth. (P. 38)	<i>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</i>	Dan Wilhelm for Greater Colesville Civic Association	Thrive Montgomery 2050 is a 30-year plan, and in some cases, its policies will continue to affect the change even after 30 years. It may not be feasible to redevelop single-family houses along major transit corridors

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		<i>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.</i>		in the near future. But the market dynamics may change over the long run creating opportunities and tools that are not available or hard to imagine today.
8.	The graphic on page 39—possible future scenario of Rt 29 corridor at New Hampshire Avenue.	<i>Page 39 - The “possible future” should eliminate the cloverleaf.</i>	Benjamin Ross	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
9.	Eradicate greenhouse gases emissions. (P. 42)	<i>change “eradiate” to “reduce”. This needs to include improved building standards. This theme needs to be expanded to include other environment elements.</i>	Dan Wilhelm for Greater Colesville Civic Association	Montgomery County has adopted a goal of zero GHG emissions by 2035 and is developing the Climate Action Plan with strategies to meet this goal, including building standards. Thrive Montgomery 2050 is a complementary plan that will support the county’s GHG elimination goal.
10.	11. Walkable communities.	<i>I realize that my area of Montgomery County is very different from other areas, and I appreciate that Thrive 2050 must take into account all of our different needs, but walkable communities that allow for people of all incomes to live well and for people to age in place with dignity need to be a priority. Population growth is not going away. We need to build for the future that is coming, not the suburban ideal of 1950 that proved to be unsustainable.</i>	Elizabeth Merlo, Silver Spring	Staff concurs

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12.	13. Safety, walkability and connectivity in less urban areas.	<i>As it pertains to Live Work Space, and the ability to create functional community synergy in areas where it is less urban, it is equally important to ensure the connectivity of those neighborhoods as well, where there are safe walking and biking paths, that will allow residents to commute without a vehicle to the grocer, coffee shops or local restaurants within the community. In doing this, it will encourage a boost in small business development within those communities, created by the residents of those communities. The ability to safely walk to recreational spaces, and schools is also one that is key in the redevelopment of areas that do not fall into the Urban plan.</i>	Charisse Callender-Scott	Staff concurs
14.	Racial justice and equity. (P. 44)	<i>Support “Racial justice and equity” as a theme. Other comments on equity should be included or referenced here.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
15.	Racial justice and equity	<i>But we also need to make racial equity and economic justice priorities for our future. I currently live in downtown Silver Spring, but for the seven years prior I lived on Flower Avenue where it intersects with Piney Branch Road. Every time I passed the Purple Line stop construction, I wondered whether Universal Supermarket, where I got most of my groceries, would get replaced by a 7-11; whether Beijing Delight would get replaced with a Panda Express. I worried that gentrification would drive out my</i>	Katie Nolan, Silver Spring,	Staff concurs.

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		<p><i>neighbors, many of whom were Spanish-speaking immigrants.</i></p> <p><i>Historically, "growth" without racial equity has led to the destruction of Black and Brown communities. In the 1950s and 1960s, "growth" along River Road in Bethesda led to the annihilation of River Road's African American community. My friend Harvey's childhood home is now a Whole Foods. Another friend's home is now a Bank of America. Because of "growth," County Executive Elrich has ignored Macedonia Baptist Church's calls for justice and allowed Bethesda Self-Storage to continue the desecration of a cemetery that predates the Civil War.</i></p> <p><i>On the County Council's website for Bill 27-19, it says: "Racial equity and social justice are urgent moral and socioeconomic endeavors for our community. Our county's population has changed, both in numbers and in diversity, and this did not happen overnight. Addressing issues of racial equity is not only an ethical obligation; it is essential to ensure the continued economic vitality of our community."</i></p>		
16.	Racial justice and equity. (P. 44)	<p><i>Emphasize racial justice: We commend including the section about the history of redlining and other discriminatory housing practices. However, we believe the plan can better tell the story of segregation, identifying both past mistakes and</i></p>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

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		<i>successes so that we can better identify solutions for the future. Therefore, we also believe the goal of integration could be woven into the plan's vision and goals more.</i>		
17.	18. Racial justice and equity. (P. 44)	<i>This section should make the case that racial and economic integration is the best way to promote social mobility, achieve equitable outcomes, and shared prosperity.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
19.	Climate change, racial justice and equity	<i>Sierra Club believes that America's most critical environmental issue is climate change and our most critical social issue is racial justice and equity. We also understand that we cannot address one without addressing the other. So Sierra Club fully understands that the various themes of THRIVE are intimately interconnected. For instance, enabling more kids to walk or bike to equitable and diverse neighborhood schools is only going to work when we have created, across the county, neighborhoods with a wide variety of housing types and costs.</i>	Shruti Bhatnagar, Chair, Sierra Club Montgomery County, MD	Comment noted.
20.	21. Racial justice and equity	<i>We applaud that the plan looks at every policy with an equity and justice lens. The plan aims to ensure that everyone has equal access to benefits and opportunities in the county, and that these are carefully evaluated at key steppingstones. We support the creation of civic lead community engagement processes at every</i>	Denisse Guitarra for Advocate Audubon Naturalist Society	Comment noted.

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		<i>planning decision, especially of those individuals who have been historically underrepresented in land use and planning decision making process.</i>		
22.	Great design and the importance of place. (P. 44)	<i>“The great design and the importance of place”. Eliminate this as a theme since it should be part of the Complete Community theme.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
23.	Regional solutions and strategies. (P. 45)	<i>“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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
24.	25. Regional solutions and strategies	<i>Growth in the metropolitan D.C. area has also been sporadic and uneven due to the multiplicity of governments competing for growth...This has resulted in a great daily westward exodus of traffic from Montgomery County to job centers such as Tysons Corner and a daily eastward commute from Fairfax County to Montgomery and Prince Georges County after work in the afternoon. Preference for large job centers should be placed elsewhere. There are nearby areas in Prince Georges, Howard and even Anne Arundel Counties which contain large areas which can and should be developed instead of concentrating growth in Fairfax and Arlington. Increased cooperation among the various</i>	Bruce Shulman	Staff concurs.

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		<i>government units in the D.C. area is absolutely necessary to prevent this situation from getting worse or occurring in different parts of the metropolitan area.</i>		

The Plan Vision

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	The Plan Vision	<i>The section on pages 45-47 entitled “plan vision” needs to be deleted. A vision is another term for theme and those were covered above and under challenges. The ideas listed are not visions but are intended outcomes.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
2.	Page 46 – Regarding “Resilient.”	<i>The MDOT MTA supports the inclusion of multimodal transportation within this context and suggests adding that individuals experience more resilient lives if they have lower-cost transit options for travel. This is especially significant for those who cannot utilize their normal mode of transportation while experiencing periods of economic hardship and disability.</i>	MDOT	Comment noted.
3.	Thrive Montgomery 2050 envisions a county that is more urban, more diverse, and more connected, providing a high quality of life for existing residents while also welcoming new residents and new ideas. (P. 46)	<i>WMCCA Comment: The envisioning of the county being more urban should be the decision of residents, not the authors of the General Plan or developer interests.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Thrive Montgomery 2050 is being developed with the help and feedback of the residents.
4.	Vision--Safe: More options for walking, cycling, and transit reduce the need for a car. Pedestrian lives are prioritized over speed. Neighbors know each other and look out for each other. A mix of populations of different ages, household types cultures, and a mix of uses has contributed to reduced crime and an increased sense of security day and night. (P. 47)	<i>This section should establish the vision that safety is enjoyed more equally by all; whereas currently, safety is experienced unequally by people of color, women, the elderly, people with disabilities, and people with non-conforming gender identities or expressions.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

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5.	Vision--Resilient: “Our actions reduce greenhouse gas emissions and air and water pollution.” (P. 47)	<i>We suggest this be changed to read: “Our action eliminated greenhouse gas emissions and minimized air and water pollution.”</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
6.	Vision--Competitive: “We embrace the cultural, racial/ethnic, and linguistic diversity of our community as a competitive advantage, particularly in attracting employers recruiting staff who want to live and work in a diverse community.” (P.47)	<i>While diversity is certainly a strength, it should not be the primary edge to our economic competitiveness.</i>	Jane Lyons for Coalition for Smarter Growth	The Plan is recognizing that diversity adds to the county’s economic advantage. The full statement of the “Competitive” vision reads: <i>The county retains and attracts large companies, small businesses, and high- quality educational institutions. We embrace the cultural, racial/ethnic, and linguistic diversity of our community as a competitive advantage, particularly in attracting employers recruiting staff who want to live and work in a diverse community. Montgomery County’s forward-looking economy offers a variety of stable and well-paying jobs. All residents have the education and economic opportunities to develop skills and obtain work that sustains them and their families.</i>
7.	This vision respects the original 1964 “Wedges and Corridors” General Plan, with a greater emphasis on a compact form of development and the role of corridors as places to grow. It continues to protect and honor the Agricultural Reserve—a nationally recognized planning landmark that provides economic and environmental benefits. (P. 47, 48)	<i>WMCCA Comment: See our comments on the Green Wedge at the top. The term “compact form of development” should be replaced by “higher density development” to avoid euphemisms</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. Compact form of development can be low-, medium- or high density. It is a way to organize the building volumes close together on a given piece of land. One version of compact development in the current Zoning Ordinance is called “cluster method of development,” which has been applied to single family

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				developments to save sensitive environmental resources on a site.
8.	“We will need to make tradeoffs that may not be easy.” (P. 48)	<i>We urge you not to use language posing change as requiring tradeoffs. It is possible to make changes that grow the pie and result in a higher quality of life for all.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.

PLAN ELEMENTS

Affordability and Attainability (Revised--Theme #4: Affordable and attainable housing: more of everything)

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1.		<i>The title of section 5 must include the word "Housing." The title "Affordability and Attainability" is not sufficient for statements about housing.</i>	League of Women Voters of Montgomery County	Title has been revised to "affordable and attainable housing" in the revised draft of the Plan.
2.	Missing Middle Housing is not affordable housing. It could occur before schools and transportation are built	<i>Thrive Montgomery 2050 is in essence a plan for more market rate housing, more specifically Missing Middle housing. Because there are no prerequisites for this additional housing, the rezoning and building of compact dense housing could occur much before schools and transportation are built. And it is unlikely the housing will be affordable to the residents who need it most—those in the lowest income ranges. Furthermore, the housing may not be affordable for those with moderate incomes in the areas of the County where land is the most expensive, thus negating the equity goals that are a central tenet of this plan. This plan needs to explain how it will achieve the admirable goals it strives for, and focus more attention on the housing needs of our most vulnerable residents.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	<p>Staff disagrees. All new housing development, including Missing Middle Housing, will have to pay impact taxes and other fees per the County's Growth and Infrastructure Policy to ensure adequate infrastructure.</p> <p>The draft Plan contains several goals, policies and actions that pertain to meeting the housing needs for those in the lowest income ranges – including strengthening the MPDU program to allow income averaging and expanding LIHTC resources.</p> <p>The Affordability & Attainability chapter encompasses broad ranges of housing recommendations to meet diverse needs, not only for our lowest income households, but also for our middle-income households who are unable to find attainable housing.</p>
3.	Increased production of all types of housing	<i>I am open to all housing types, market rate or otherwise, but the focus should be on housing for those with the greatest need. I do not agree with MNCPPC that merely</i>	County Executive, 8-14-20 (This comment was	Staff believes there is adequate focus on housing for those with the greatest need. As noted in the Housing Needs Assessment , the

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		<i>building more market rate housing will let the County achieve its Equity goals. I am committed to achieving Equity in housing, education, and jobs through a variety of funding and planning tools. These goals have been at the core of my public service.</i>	made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	county has a housing supply gap, creating more demand for more affordable housing and putting pressure on the on the cost of existing housing. Building more market rate housing is one tool the plan recommends to help put pressure on the existing cost of housing.
4.	Need for retention of single-family houses and creation of more family-sized units	<i>A zoning policy that prefers the creation of small units unsuitable for raising children exacerbates pressure on the existing housing stock if young families seek larger homes as their family grows. Simultaneously acting to reduce the supply of single-family homes only further adds to the competition for what remains in that portion of the housing stock. Evidence is that families leave the County to find single-family homes and townhouses in more affordable areas and if there is market demand for 3 or 4 bedroom apartment units it is not evident given the lack of new supply. In fact, 3 and 4 bedroom apartments in new development are more expensive than buying a house with a yard in most of the County.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff concurs with the need to incentivize the creation of family sized units. Policies included in the draft chapter address this.
5.	The high cost of housing makes it challenging to attract younger workers to replace the baby boomers who are leaving the workforce.	<i>Our zoning policies preclude affordable housing for young workers, particularly those who are not in the higher paid professions, and we require only MPDUs which don't address the most pressing housing needs. As a result, households with incomes below 65% of AMI wind up</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals,	Staff concurs and believes that MPDUs are only one part of the county's affordability strategy. Coupled with other types of policies and innovations as recommended in Thrive, MPDUs and other affordable housing will help to increase and

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		<i>occupying the lowest priced housing available, often the MPDU priced housing (though most is market affordable rather than controlled). They compete for these units, often spending 50% or more of their income, with households that can afford that price range.</i>	Policies and Actions)	preserve affordable housing. Beyond the policies in Thrive, please review the recently completed Preservation of Affordable Housing for preservation related policies.
6.	The car-oriented land use pattern of the past few decades reinforced the suburban pattern of neighborhoods separated and defined by income, limiting diversity in our interactions. Knowing your neighbors and having a diverse and robust social network with opportunity for interaction contribute to a feeling of welcome, safety and support.	<i>Montgomery County seems like every other area in the region (if not the country). The problems identified with “built environments” exist in both DC and Baltimore, true cities, despite being far more urban and less car-oriented than we are. Home prices and rental costs remain the great dividers today, long after we’ve eliminated the discriminatory housing practices of the past. That said, we have many diverse mixed income single-family neighborhoods, both in areas built in the 1950s and since then. They should be valued not only for their diversity but also for their relative affordability.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff concurs that we have many areas of diversity (both demographic and housing) and believe the recommendations of the draft Plan celebrate this diversity. Additionally, the policies will encourage additional housing development across the county further encouraging diversity through housing access.
7.	85% of the County’s land area is constrained by environmental and human-made factors	<i>The statistic that 85% of the County’s land area is constrained by environmental and human-made factors is confusing. What are human-made factors? It appears to be single family homes, attached and detached, town houses, and the roads that serve them. This land is not constrained in the true sense. In fact, much of it is being redeveloped with new single family homes—at least 848 new homes have been built to replace teardowns in the down county.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff will share the methodology and results of an updated analysis of the built environment, including zoning capacity and market assumptions, at a future work session for the Residential Development Capacity Analysis.

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8.	Need to create more opportunities for diverse housing	<p><i>No analysis of existing zoning. The capacity to house people already exists and is primarily along existing and planned transit lines – both rail and BRT.</i></p> <p><i>One ought to look at the market and what it's telling you. First zoning was the problem so we up-zoned. Up-zoning drove up land costs, higher land costs drove the need for higher yields and made building smaller, less expensive units undesirable given that the land cost is based on the zoned potential and won't get adjusted if one decides to build less than the maximum.</i></p>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff will discuss with the Planning Board the methodology and results of the Residential Development Capacity Analysis—an estimate of the total potential residential development that may be built in the county under existing zoning and certain assumptions and constraints.
9.	Attainable housing v affordable housing	<i>Attainable housing is market rate housing. (The County has tried the “trickle down” approach to housing supply, and that has not worked.)</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Increasing attainable housing expands the supply of available housing, thus facilitating strategies to create more affordable housing to work. Staff believes that housing affordability has to be addressed through both market rate and subsidized housing strategies.
10.	Housing affordability is one of the biggest issues facing Montgomery County. As previously mentioned, median household income is slowly recovering from the Great Recession of 2008. Annual growth in construction costs increased in the range of 3% to 4% per year during the past five years. Annual building permits issued since 2015 continue to drop below 4,200 permitted units, approaching	<i>What is driving the high construction costs, and how feasible is it to help bring these costs down? Are costs tied into materials transport, and expanding local production sources might assist? Or are costs a result of fitting within limited right-of-way in dense areas, or a lack of staging areas? How do regulations and the time from submittal to approval affect costs? How much has zoning contributed to rising</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Rising construction costs in both material and labor for residential and commercial development are occurring not only in Montgomery County, but also across the region and the nation in communities with a variety of zoning and densities; the increase in construction costs are driven by external factors. The reasons for increases in the cost of

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	recession levels. This combination of stagnant income growth, high construction costs, lack of new housing supply, and the high cost of housing has impacted cost burden and homeownership rates. (P. 6 of the 6-11-20 staff report)	<i>construction costs, by encouraging developers to defer utilization of land until prices support this more expensive development model. The increase in land prices that flows from increasing the development potential of land, leads to more expensive construction techniques and ultimately higher consumer prices, which in turn fosters economic segregation. There is no balance in the kind of housing stock we try to create in urban areas when the singular focus is on density.</i>		housing construction are multiple and complex, some of them within the county's areas of influence and others driven by larger market forces. The draft Plan proposes to use all possible tools and strategies to bring down the cost as much as possible.
11.	<i>Plan should emphasize the County's commitment to providing housing for those most in need throughout the County, rather than relying on market rate Missing Middle Housing to produce equity</i>	<i>The objectives of ensuring available housing in walkable compact development for our full range of incomes (price points) is important. The challenge of ensuring that availability is how to ensure our full range of incomes and workers will be accommodated. The developments will need more than current MPDU level incomes and required distribution of 12.5-15%. The development of market rate mid-rise and smaller multi-unit buildings will be lower cost development and provides the potential for a lower starting point for the subsidies that are needed to address the full range of incomes represented by our employment distribution. The goal of ensuring a full range of incomes having access and opportunity in these compact developments needs affirmation. Market rate "missing middle" housing is not affordable to the lowest range of incomes in Montgomery County. The plan</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The Affordability & Attainability section of the Public Hearing Draft goes beyond just the provision of Missing Middle or market rate housing to support equity. It emphasizes the need to create housing affordable and attainable at all incomes levels and includes specific policies and actions to protect existing and create new affordable housing. Additionally, the draft Plan includes goals and policies related to creating mixed-income communities, and reducing gentrification, displacement, segregation and concentration of poverty.

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		<i>needs to emphasize the County's commitment to providing housing for those most in need throughout the County, rather than relying on market rate housing to produce equity.</i>		
12.	Need for more housing	<i>Montgomery County continues to need more housing, especially low-income and "missing middle" housing designed for low- and middle-income households. ("Missing middle" includes garden apartments, plexes of various types, and other low-rise, smaller, more affordable units.)</i>	League of Women Voters of Montgomery County	Staff concurs
13.	Need to retain existing affordable housing	<i>Clearly, building new housing to accommodate the increase in the number of residents with incomes less than \$50,000 is necessary, but retaining current housing at affordable levels is also important. Many of the policies and actions on pages 86-95 provide a blueprint for how the county can provide more affordable housing. I applaud the policies for using office parks, shopping centers and other underutilized properties as sites for building these properties and with working with faith-based institutions and nonprofits to finance this housing</i>	Phyllis Edelman	Comment noted.
14.	Need more affordable housing	<i>New housing IS needed in the County. MORE AFFORDABLE housing is needed even more. This plan does not accommodate that 2nd goal. As a new homeowner in the County, I was dismayed by the lack of homeownership opportunities for our lower income residents. Simply creating multi-unit housing does not solve that problem. What</i>	Asma M.	Affordable housing is a major focus of the draft Plan. Please refer to the following policies related to homeownership: Policy 5.1.9: Expand current state and county programs and identify new tools to increase access to homeownership in order to support

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		<i>we need is access to existing affordable housing, opportunities for homeownership for multi- income levels and a greater accessible multi-modal transit system.</i>		<p>and improve paths to homeownership, especially among low-income residents, people of color, and younger households.</p> <p>Action 5.1.9.b: Expand support for county and nonprofit organizations like the Housing Opportunities Commission’s Mortgage Purchase Program that provide education and financial counseling on homeownership, especially for low- and moderate-income households and households of color</p> <p>Action 5.1.9.e: Explore establishing a community land trust to create permanent, affordable homeownership opportunities.</p>
15.	Does the Plan eliminate all single-family housing in urban areas?	<i>Page 46. Urban Single-family housing is not even mentioned. Is the goal to eliminate all single-family housing in urban parts of the county?</i>	Herb Simmens	The draft Plan does not propose to eliminate single family housing in urban areas. The draft Plan seeks to ensure that single-family zoning is not a barrier to creating more diverse housing options in our single-family neighborhoods near high-capacity transit, where the Plan promotes allowing Missing Middle housing in addition to single-family housing.
16.		<i>There are many residents (now and in the future) that will desire a bit more space and having an option to choose a single-family home should be provided, not discouraged. Please do not discriminate against residents</i>	Virginia Bunke, Silver Spring	Thrive Montgomery 2050 anticipates that single-family housing will continue to exist throughout the county. What the draft Plan proposes is to add Missing Middle housing in

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		<i>who choose to live in single family homes and choose to own automobiles.</i>		our single-family neighborhoods near high-capacity transit to create more diverse housing options near transit corridors.
17.	More protections for renters, less emphasis on homeownership.	<i>We need better protections for renters, less of an obsession with home-ownership, more housing stock diversity, better rates of unit growth, and a policy of reviewing (perhaps every 5 years) the practices governing these things to keep pace with changes on the ground. Feeding back into the "connectedness" dimension, there need to be channels for people to express concerns, make observations, comment on changes, etc; that are utilized by a representative slice of the affected populations.</i>	Edmund Morris	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
18.	Rezoning the single-family zones	<i>Rezoning the single-family zones in the entire county to allow market-rate townhouses, duplexes, triplexes, and apartment buildings by right throughout the single-family neighborhoods does not give residents the diversity to live in neighborhoods of their choice. When purchasing a home residents consider many factors including schools, commuting distance to employment, nearness to shopping, living close to friends and family, and many other issues.</i>	Quentin Remein, Michele Albornoz, Linda and Gay Mullings	The Plan does not propose rezoning of single-family areas throughout the county and would not eliminate single family housing. The draft Plan proposes to add Missing Middle housing such as duplexes and triplexes in single-family zoned neighborhoods near high-capacity transit corridors only, in order to provide more housing type options near transit.
19.	—More market rate housing will not address affordable housing issue.	<i>Nothing is proposed to deal with the specific shortfalls in affordable housing, instead it's a version of the market will solve this – the DC region has been talking about a crisis in affordable housing since</i>	County Executive, 8-14-20 (This comment was made on the 6-	The draft Plan already includes several goals, policies, and actions to address the specific shortfalls in affordable housing – including increasing our share of the low-

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		<i>the 1980s, and no amount of building in any or all jurisdictions has succeeded in stemming the loss of affordable housing.</i>	11-20 draft of Vision, Goals, Policies and Actions)	income housing tax credit, allowing income averaging for MPDUs, and working with mission driven developers to build capacity and streamline the affordable housing development process.
20.	Need for more affordable housing	<i>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</i>	Michael English, Silver Spring	Staff concurs.

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		<i>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>		
21.	Home ownership	<i>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.</i>	Michael English, Silver Spring	Comment noted.
22.	Historical districts	<i>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.</i>	Michael English, Silver Spring	Comment noted.
23.	Need for more information about creating more diverse housing types	<i>There needs to be more specificity when suggesting a transformation of single-family neighborhoods. What different housing types, and where? Are the housing types compatible with existing homes? A duplex, for example, might be while a high-rise would not. Have you assessed the potential impacts of changes on homeowners who choose to retain their property as is? Has this been done in other</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The Planning Department completed a Missing Middle Housing Study in 2018 and also has been exploring the application of this approach in several recently completed or active master plans. Further details can be found here: https://montgomeryplanning.org/planning/housing/missing-middle-housing/

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		<i>jurisdictions similar to Montgomery County? If yes, with what results? There are many single-family neighborhoods in the County – which should be changed? . Why is this approach more effective than using land use and zoning powers to provide more – and more affordable – housing near already existing infrastructure?</i>		This work will be advanced further and shared with the Community during future master plan processes that will be conducted to start implementing the draft Plan’s recommendations.
24.	Need more information about Missing Middle Housing	<i>In order to add Missing Middle Housing, the plan recommends rezoning parts of the single family neighborhoods without being clear about the location, other than a preference for being near transit. The plan is vague, too vague, not only on location, but also on specifics on how the County resolves the stubborn issue of Equity. There needs to be a bigger conversation than the narrow focus presented in the plan. The plan needs to identify generally where this new housing will be located, and then the County needs to come together to put its resources toward making the Equity goal a reality over the next 30 years.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	These details will be analyzed and shared with the Community during future master plan processes that will be conducted to start implementing Thrive Montgomery 2050’s recommendations. Additionally, the Planning Department is currently exploring Missing Middle housing options as part of recent master plans.
25.	Missing Middle Housing should be allowed throughout the County.	<i>While encouraging development along corridors and near transit is key, there also needs to be policies that allow missing middle type housing throughout the County. In order for supply to meet housing demand over the next 30 years, multiple tools and approaches are required.</i>	Stacy Silber	The draft Plan proposes to focus all new growth in transit accessible areas because any significant growth in areas not accessible by transit will have negative impacts for traffic, equity and the environment.
26.	More housing affordable to all	<i>I would like Thrive 2050 to provide a better explanation of incorporating housing affordable to all socioeconomic backgrounds into our community, and to</i>	Medhini Murali, Germantown	These comments will be considered and discussed further during the Planning Board worksessions to

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		<i>guarantee affordable housing to those even with the lowest of incomes.</i>		inform revisions and reorganization of the draft Plan.
27.	Need for more affordable housing	<i>Affordable housing is emphasized a lot but is not adequately defined. Previous rental programs and current homeownership programs do not adequately help to solve the issue. Lower income and high housing costs are especially prohibiting if you have a disability with additional healthcare costs. Despite all my privileges as a White person born in Silver Spring, raised middle class, benefitting from generational wealth, I am struggling to get ahead in housing at a moderate income level and hitting a wall with county support. If I can't make it, I wonder about my neighbors, people of color, immigrants, also struggling to live here.</i>	Misha Clive, Silver Spring	Comment noted. These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
28.	Need for more diverse housing types	This is a great plan, and great plans should aim high or they will never be realized. While we have made great progress, single family zoning is keeping us in the past. Diversity in housing types used to be more commonplace, it provided affordable options for people who wanted to settle down, but today in Montgomery County it is restrictive and unaffordable. To move forward, the plan must sever ties to things keeping us in the past.	William Kirwan III, Silver Spring	Comment noted.
29.	Urgent need to address housing affordability and equity.	The plan talks about the need for more outreach and education about planning, and changing single family zoning to give people more access to affordable homes	Dan Reed, Silver Spring	Comment noted.

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		near jobs and other needs. I am losing patience for people who claim to care about diversity or equity but oppose any change. Let's move forward with this plan.		
30.	Need more transit-oriented development with diverse and affordable housing.	Broadly support Thrive 2050. Transit-oriented development is a great focus, with attention to redev, reuse, and infill. We should be as big and bold as possible, especially with housing. Economic health, equity, and environmental resilience are dependent upon more housing. Missing middle housing is key to diversifying and densifying neighborhoods and increasing transit ridership.	James Hedrick, Action Committee for Transit, Rockville	Staff concurs.
31.	Need to address exclusionary zoning and other practices.	Exclusionary zoning has explicitly racist origins and single family zoning must be addressed. It is also classist and ageist. Growth is slowing because we are not building enough housing for millennials and younger adults. Covenants are also extremely discriminatory, with minimum list prices, setbacks, uses, and racial discrimination. Thrive should include concrete actions to address zoning and other exclusionary practices countywide.	Gray Kimbrough	Comment noted.
32.	Need for more housing	<i>As the Building Industry Association, we are particularly pleased to see yet another acknowledgment that the County is not producing enough housing and that we need solutions to achieve the social, economic and fiscal objectives necessary for a healthy County in the future.</i>	Griffin Benton, MBIA	Comment noted.

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33.	More affordable housing near transit	Graduating college soon and entering the job market in the county, so it's important for the county to have affordable housing options for all income levels. Incentivize smart growth around transit and provide convenient amenities. The plan should prioritize mass transit, provide housing, and specifically more housing around public transit.	Siena Fouse, Silver Spring	Staff concurs.
34.	Relationship of inequity in housing and education to restrictive zoning and housing policies	Segregation in schools built on restrictive zoning and housing policies. Schools with highest mobility rates are most often schools with majority students of color. For too long, the wealth gap that starts with barriers to homeownership has fallen on the backs of our black families who historically have been precluded from owning homes and still dictates who gets to live where today.	Jill Ortman-Fouse	Comment noted.
35.	Need to increase housing supply	I strongly support the housing goals of Thrive 2050, especially additional density in single family areas. The lack of market rate housing has reached a crisis point in Silver Spring, which has been building for many years. There are no options for empty nesters to downsize, so they stay in their oversized homes. Small homeowners don't have larger homes to buy so they expand theirs. Small homes torn down and replaced by million dollar homes. I agree with Thrive 2050's goals to remove impediments to increasing the housing supply, a will to change current policies when necessary, and acceptance by all the	Liz Brent, Go Brent Real Estate & Silver Spring Cares	Staff concurs.

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		more housing and new residents are a benefit to all.		
36.	More diverse housing in all areas of the county	The plan targets residential neighborhoods but did not do enough to prioritize adding housing in existing higher income residential areas, or consider what changes to current residential development regulations could help achieve its goals.	Katherine Lucas McKay	Staff concurs and believes the reorganization will meet the intent of this comment.
37.	Need for more diverse housing and transportation opportunities	I support Thrive 2050, especially diversifying housing and creating equitable home and transportation opportunities. I moved to Montgomery County to work in the theater industry and education in Bethesda, and was able to do so because of my family support and privilege. My wages alone would not be able to support my rent, but thankfully my roommate made enough to cover the costs. Many other people who do not have my privilege would not have been able to rely on their roommate or family. In addition, the lack of reliable transit between Silver Spring and Bethesda means I would either ride the Red Line for an hour or drive. The Purple Line is a great step in the right direction, but additional transit is necessary if we want people of all economic backgrounds to live and work here. Many higher income families take advantage of the county's world class education, and I would love to see more families of mixed income be able to benefit from it as well.	Rosie Alger, Silver Spring	Staff concurs.
38.	Housing segregation in the county	<i>I have been impacted by housing segregation in the county. I have grown up</i>	Mauricio Quintero-Aviles	Staff concurs.

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		<i>in a predominantly white community, and it was rare to see people who looked like me. It is impossible to promote diversity when our county is so segregated by housing. Affordable housing should be available in all parts of the county.</i>		
39.	Evolution of single family neighborhoods near transit	I have come out to support attainable housing for all income levels and the evolution of single family neighborhoods near transit. My roommates and I don't see a future in Montgomery County without moving up the highway corridor or away from the Metro, getting a car, or changing my career to earn more money. It would take over 25 years just to save for a down payment on houses in our neighborhood, given wages and home prices stay flat. Duplexes and triplexes would open up opportunities to a variety of professionals. More affordable places in the county are a possibility but require a car and leave no savings.	Benjamin Keel, Silver Spring	Staff concurs.
40.	The additional density of Missing Middle Housing will put a strain on already antiquated infrastructure.	<i>The key to Thrive Montgomery seems to be in "missing middle housing" that will create economic growth (and somehow jobs), fix deficits and equalize inequity. Many listening and unable to speak, think this is a simplistic solution that looks like a Global ZTA that will override a General Plan. We already see a ZTA proposed by Councilmember Jawando, which looks to invade the R60 neighborhoods. We know that the Planning Staff is not an author of this ZTA. Though Chair Anderson stated</i>	Patricia Depuy Johnson	Thrive Montgomery 2050, as a General Plan, addresses a wide variety of issues, and Missing Middle housing is only one of its many strategies to address the county's housing needs and support community equity. Any additional density will be implemented and supported by detailed analyses and planning through subsequent local master

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		<i>that “missing middle housing” is just a “small piece of it”, that doesn’t ring true. Those of us that live in single family homes are afraid that we will wake up one day to find a townhouse development, duplex or triplex springing up next door where a single home has been torn down. The impact to infrastructure is real. The additional density of “missing middle housing” puts a strain on already antiquated electrical grids, sewage and water supplies, garbage collection, storm water management, internet capacities, and roads in need of repair</i>		plans and infrastructure needs will be considered as part of the Board’s review of proposed residential development applications.
41.	Over one-third of the county is used for single-family homes (detached and townhouses). A recommendation of Thrive Montgomery is to build on the concept of focusing growth along corridors, even if this may require changes to land use and densities along these corridors. (Page 15 of the Public Hearing Draft)	<i>WMCCA Comment: As written Thrive Montgomery is declaring war on single-family homes. If we follow the money, who stands to profit from this? Not the residents. To meet our objective of sustainable growth, for every up-zoned area, there should be an equal down-zoned area. The down-zoned areas should be given Transfer of Developable Rights (TDRs), similar to what happened in the Ag Reserve, that can be sold to developers in the up-zoned areas. Without a balance between up-zoning and down-zoning, the overall density in the County will continued ratcheting up.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The draft Plan does not propose a countywide upzoning of single-family neighborhoods. It recommends allowing more diverse housing within walking distance around transit stations, which will require rezoning of these areas. The Plan, including the 2050 Vision statement, anticipates the county will continue to have a robust mix of urban, suburban and rural areas with various densities appropriate to their location and context.

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42.	<p>This additional density will require change in existing single-family neighborhoods through the introduction of “missing middle” housing, such as duplexes, triplexes, townhouses, live-work units and small multi-family structures in areas where a moderate degree of intensification is appropriate. (P.38)</p> <p>What is Thrive Montgomery 2050 proposing regarding single-family zoning? ...Specifically, Thrive Montgomery 2050 recommends increasing densities along corridors especially those served by transit. These densities should be commensurate with context of the surrounding areas. In some cases, this will involve increasing densities in areas that have been historically characterized by single-family housing and could include duplexes, triplexes and small multi-family buildings. (P.42)</p>	<p><i>WMCCA Comment: To meet our objective of sustainable growth, for every up-zoned area, there should be an equivalent down-zoned area. The down-zoned areas should be given TDRs (similar to what happened in the Ag Reserve) that can be sold to developers in the up-zoned areas.</i></p>	<p>Kenneth Bawer for West Montgomery County Citizens Association</p>	<p>Staff does not believe that a TDR mechanism is needed or appropriate to direct growth towards transit corridors.</p> <p>Decisions to upzone or downzone should be informed by the context and the desire to meet a specific goal. For example, while TDRs may benefit developers seeking higher density, the goal is to preserve agricultural uses. Additionally, downzoning risks limiting the ability of the county to meet its housing supply gap or future infill development opportunities.</p>
43.	<p>Housing attainability and affordability is an economic as well as an equity issue. Unless we grow our housing supply to make room for the projected 200,000 new residents moving to the county by 2045, our existing communities will become more expensive, less diverse, and integrated, and it will be difficult to attract and retain a skilled workforce. (P. 42)</p>	<p><i>WMCCA Comment: See our comments above. We don't see the projection of 200,000 new residents as a fait accompli. If the housing supply is not grown, there will be no place for new residents to move into, and the county's population will not grow as projected. This is a decision for residents to make, not the authors of the General Plan or developer interests.</i></p>	<p>Kenneth Bawer for West Montgomery County Citizens Association</p>	<p>Staff disagrees—see staff response on Page 11. Additionally, the county's population has continued to grow in recent years at the same time as the amount of new housing construction is not keeping pace with demand, putting a greater burden on existing housing supply and driving up housing prices. Please see the 2020 Housing Needs Assessment.</p>

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44.	Single-family neighborhoods near employment centers and transit need to have a greater mix of housing types that provide less expensive options for our growing population and for existing residents, making our communities more affordable and equitable. This will require a comprehensive review of impediments to increasing the housing supply; a will to change current policies when necessary, such as reexamining our zoning and other controls to create a greater mix of housing types in new and existing communities; and an acceptance by all that more housing and new residents are a benefit to the county and the region.(P. 43)	<i>WMCCA Comment: To meet our objective of sustainable growth, for every up-zoned area, there should be an equal down-zoned area. The acceptance of more housing and new residents should be the decision of residents, not the authors of the General Plan or developer interests. See above comments on population growth. In addition, tax breaks (such as multi-year tax abatements) should not be given to developers - they need to pay their own way and not be subsidized by taxpayers.</i>	Kenneth Bawer for West Montgomery County Citizens Association	<p>Staff disagrees that the sustainable growth needs down-zoning to balance each up-zoning.</p> <p>Decisions to upzone or downzone should be informed by the context and the desire to meet a specific goal. Additionally, downzoning risks limiting the ability of the county to meet its housing supply gap or future infill development opportunities.</p> <p>The purpose of General Plans is to provide guidance to manage future growth and development. Montgomery County is projected to see population growth in the future and is already facing a housing supply shortage that is not meeting current demand.</p>
45.	Figure 25: Lining corridors with appropriate densities provides housing options. (P. 48)	<i>WMCCA Comment: The “before” image of a tree-lined street with a fully wooded forest on the right is replaced with cheek-to-jowl buildings in the computer graphic image at the bottom. While this may represent a cash cow for developers, it represents a horror show for residents whose local woodland has been clear cut. This is just another example of the developer-centric vision represented by the Thrive 2050 document in its current form.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The graphic is intended to show how future growth along the corridors can be compatible in scale and size to its surrounding context and provide adequate transition to adjacent single-family neighborhoods. Natural resources on each site are analyzed and reviewed for preservation or replacement as required by county laws and regulations.

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46.	Definition of single-family housing	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	The definition will be added to the glossary in the Plan. Single-family detached homes are stand-alone homes that do not share any walls with another housing unit. Duplexes—two side-by-side units with a shared party wall-- are considered semi-detached single-family units. And townhouses are considered attached single-family homes. All of these are considered single-family because they contain one primary unit on a recorded piece of land. A single-family unit may contain an accessory unit in addition to a primary unit through a conditional use application. Any structure with two or more primary units (as compared to a primary unit and an accessory unit) on a single lot is considered multi-family development.
47.	The exclusionary nature of Euclidean single-family zoning	<i>The plan should highlight the original intent of single family zoning, currently the supreme court case Euclid vs. Ambler is not even mentioned once. Euclidean zoning was created to promote racial/economic segregation. If one of the chief goals of the new general plan is to reduce racial/economic segregation then the plan needs to launch an all out attack on the entire concept of Euclidean zoning and make a strong argument as to why we need to do something different now.</i>	Michael Dutka	Comment noted.

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48.	Diversity of housing types in all areas of the county, not just near transit.	<i>Rethink single family zoning, not just around transit: We need to allow and encourage a range of housing types in neighborhoods near transit. However, we should not limit zoning reform to these areas. This has the potential to spark opposition to new transit, if single family homeowners know that new transit goes hand in hand with zoning reform. This also has the potential to leave out areas of the county that are predominantly white and high income — the kinds of places that are still exclusive today due to racist policies of the past, which will not be undone without intentional planning otherwise. While our priority for growth should be near high-capacity transit, we must include other measures to diversify housing options in other neighborhoods while also extending transit.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
49.	Evolution of single-family neighborhood near transit	<i>“Evolution of single-family neighborhood” should not be included as a separate theme since it is included in other themes.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
50.	Evolution of single-family neighborhood near transit	<i>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.</i>	Brian Ditzler. Silver Spring	Staff concurs.
51.	Evolution of single-family neighborhood near transit	<i>Thrive Montgomery recommends rezoning single family neighborhoods and corridors over the next 30 years to allow new</i>	County Executive	The draft Plan proposes to allow Missing Middle housing types only in single-family areas near high capacity

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		<p><i>housing types in the single family zones, starting with neighborhoods near transit. Thrive Montgomery, however, does not restrict the rezoning to neighborhoods near transit, and it takes no position on when the rezoning would occur. As a result, the Council may—through a single zoning text amendment--rezone the single family zones in the entire county (primarily R-60, R-90, R-200) to allow market rate townhouses, duplexes, triplexes, and apartment buildings by right throughout the single family neighborhoods, requiring only a building permit to move forward. The rezoning of our single family neighborhoods and our corridors to permit new market rate housing types could occur at any time, long before the other recommended elements for Complete Communities and 15-minute living are in place, and with no guarantee that these elements —new parks, new sidewalks and bike trails, new street grids, and completion of our transportation plans for transit are feasible in all areas or will ever be built. It also could be done without sufficient engagement from the communities themselves.</i></p>		<p>transit corridors. It does not propose a countywide rezoning of single-family zones.</p> <p>Implementation of the Missing Middle housing recommendation and other recommendations in Thrive Montgomery 2050 will take place through subsequent area master plans, countywide functional master plans and related sectional map amendments, district map amendments, zoning text amendments or other mechanisms approved by the County Council, all of which include opportunities for public input. Developments will be subject to local area master plan compliance and the Growth and Infrastructure Policy (GIP) requirements and guidelines, as amended by future Council Councils to ensure provision of infrastructure and public services.</p>
52.	Will Missing Middle Housing overwhelm existing neighborhoods?	<p><i>Adding duplexes or triplexes might not result in much of a change given that ADUs are already allowed. Allowing small multifamily structure of up to 20 units on a single family lot would completely</i></p>	Robert Oshel, Silver Spring	<p>The draft Plan proposes to conduct a Missing Middle Housing Study as a follow up action that will explore specific strategies for incorporating these housing types.</p>

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		<i>overwhelm the infrastructure in existing single family neighborhoods.</i>		
53.	Support for Missing Middle Housing	<i>I have no desire to see old neighborhoods torn down in favor of massive housing complexes, which is why I support Montgomery for All's approach of adding in the missing middle by supporting ADUs and low-rise, smaller housing units. This is smart growth.</i>	Elizabeth Merlo, Silver Spring	Comment noted.
54.	Visions--Affordable ...Housing closer to workplaces and safe, affordable transit options save time and money and reduce greenhouse gases. (P. 45)	<i>We urge you to change "housing closer to workplaces" to "housing closer to job centers, amenities, and other destinations."</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
55.	Conformance of the housing chapter to the requirements of the State law HB-1045.	<i>Planning [MDP] recommends that the county evaluate its Affordable & Attainability Chapter relating to the housing element (pages 88-93) for conformance to the requirements of HB-1045. The HB-1045 (2019) defines low-income households based on 60% of the United States Department of Housing and Urban Development Area Median Income (HUD AMI) and 60% - 120% HUD AMI for workforce households. Planning recommends that these definitions be included in the Draft Plan to clarify the terminology for the public. Planning notes that the Draft Plan includes a statistical analysis relating to the challenges of the future for the housing supply and demand. The Montgomery County Housing Needs Assessment, July 2020 does not appear to be referenced, but should be adopted by</i>	MDP	Comment noted. Staff will evaluate the chapter for conformance with the State law.

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		<i>reference or included as an Appendix to the general plan.</i>		
56.	Emphasize both market rate and subsidized housing	<i>This chapter would generally benefit from stronger “both/and” messaging around market rate and subsidized housing, rather than “either/or.” Subsidized housing is incredibly important in order to make sure Montgomery’s neighborhoods are affordable for households of all incomes, including the lowest income households.</i>	Jane Lyons for Coalition for Smarter Growth, Frank Santos Fritz, Silver Spring	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
57.	Need for more affordable housing and family sized units.	<i>“Affordable Housing.” Most of the new housing should be located in targeted growth centers, which should be in the Complete Communities. Most of the new housing should be multi-family and there needs to be more two and three-bedroom units. To achieve affordable housing the county-imposed costs need to be substantially reduced. The recent tax and moratorium changes being considered by the council as part of the Subdivision Staging Policy are a good start.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
58.	Housing affordability at all income levels in all communities to address inequities and segregation of the past.	<i>Habitat for Humanity is extremely pleased with the Thrive 2050 draft. We applaud planning staff for lifting up housing as a right for all people, for highlighting the importance of housing in addressing racial inequities, and supporting increased density along transit corridors. Segregated neighborhoods have led to incalculable inequities in wealth, policing, education, health, and access to high quality transit, green space, and other important amenities. It is critical that as a</i>	John Paukstis for Habitat for Humanity Metro Maryland	Comment noted.

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		<p><i>County we implement policies that ensure housing affordability at all income levels in all communities. We must also ensure that affordable housing includes both rental and ownership opportunities. Habitat is particularly concerned with the homeownership gap between white and Black households and between white and Latinx households, a gap of 36 points and 22 points respectively. Habitat strongly supports the Actions in section 5.1.9 and encourages the inclusion of programs that provide financial education and credit training to young adults.</i></p> <p><i>The County can also reduce the homeownership gap by increasing opportunities to build Missing Middle housing. Habitat strongly supports rezoning along transit corridors and throughout the County to allow for affordable housing options including duplexes, triplexes, ADUs, quads, and garden style apartments. All families should have the opportunity to live near their jobs, public transit, and high quality school and amenities.</i></p>		
59.	The role of non-profits in providing affordable housing	<p><i>Nonprofits often play a critical role in providing accessibility modifications, but are unable to access tax credit incentives. The County must ensure that there is both funding available and tax and non-tax incentives in place to encourage retrofits of existing housing and the development of accessible homes.</i></p>	John Paukstis for Habitat for Humanity Metro Maryland	Staff concurs.

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		<i>The County can help affordable housing providers by increasing the Housing Initiative Fund, streamlining the entitlement process, utilizing Right of First Refusal for both rental and ownership opportunities, providing flexible zoning, creating an affordable housing ombudsman, reducing costs to build, and prioritizing public land for housing.</i>		
60.	Need for more affordable housing	<i>I cannot afford the \$700,000 to \$1M+ homes that are in the neighborhood a block away from my apartment building and almost no new condo units have been built in the last eight years in downtown Silver Spring. Existing condos are hot commodities staying on the market for only a few days. Yet, most are only 1 or 2 bedrooms, which mean that a family may find themselves out of space quickly, especially with work-from-home becoming a new norm... Buying a house in an "affordable" neighborhood would mean an hour+ commute for me and my husband for days we have to go into work.</i>	Elizabeth Merlo, Silver Spring	Comment noted.
61.	Need for emphasis on socioeconomic integration and addressing barriers to missing middle housing, and bolder action for rent stabilization and eviction protection.	<i>I love Montgomery County and I want to put roots down here, but when the average home prices is over half a million dollars, it's not exactly affordable. That's why I am excited this plan calls for diverse housing types, projects near transit, and distributing affordable housing evenly across the county, including wealthy areas. That said, I'd like to see more emphasis on socioeconomic integration and addressing</i>	Berk Ehrmantraut	Comment noted.

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		<i>barriers to missing middle housing. Additionally, there should be bolder action on rent stabilization, eviction protection, and affordable housing.</i>		
62.	Locations with good access to transit or employment centers are generally too expensive for many people, forcing them to live farther from job centers and other destinations, limiting their access to job opportunities, recreation spaces and other county resources. While owning and operating a vehicle is expensive, transit can also be expensive and, for many, difficult to access. (P. 74)	<i>Page 74 - In second paragraph, replace "Locations with good access... are generally too expensive..." with "The scarcity of housing in locations with good non-automobile access... makes them generally too expensive..."</i>	Benjamin Ross	These comments will be considered and discussed further during the Planning Board work sessions to inform revisions and reorganization of the draft Plan.
63.	Page 84, Issues and Challenges. Think about housing supply and demand in submarkets rather than the county as a whole.	<i>Montgomery needs to start thinking about housing supply and demand in submarkets rather than as Montgomery as a whole. An oversupply of moderately priced housing in Damascus doesn't solve housing demand in Silver Spring.</i>	Jane Lyons for Coalition for Smarter Growth	Staff concurs.
64.	Page 85, Vision for Affordability and attainability	<i>We urge you to more explicitly include racial and economic integration.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
65.	Page 85-86, Build More Housing, of More Types, in More Ways "In order to build more housing, community-led support for and championing of new housing development is critical."	<i>Community support is important for all issues addressed in Thrive. What should be highlighted is how many community members use the current planning process to block new housing or zoning changes. How can the county lead a paradigm shift on this?</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
66.	Housing for aging population	<i>Page 84 (Issues and Challenges): The information on aging population (page 16) should be included. Providing housing for</i>	MDP	Comment noted.

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		<i>aging population could be a challenge for the county.</i>		
67.	Age-friendly housing	<i>Page 87 (Goal 5.1): The county may want to consider a policy to support livable and age-friendly housing communities.</i>	MDP	Comment noted.
68.	Housing for older adults near transit stations/centers and service establishments.	<i>Page 87 (Refer to Policy 5.1.8): Planning staff suggests that the county consider building or retrofitting housing that meets the needs of older adults near transit stations/centers and service establishments.</i>	MDP	Comment noted.
69.	What is Thrive Montgomery 2050 proposing regarding single-family zoning? ... Thrive Montgomery 2050 proposes to increase the production of different types of housing near transit, including in existing single family zones. This is an important step toward addressing past inequities in housing choice, while also creating more options for affordable and attainable housing. Specifically, Thrive Montgomery 2050 recommends increasing densities along corridors especially those served by transit... (Page 41 of the Public Hearing Draft)	<p><i>Encourage further boldness. We should not merely be recommending duplexes and triplexes - the general plan needs to be clear that in the future, all communities in Montgomery County are going to be complete communities-- where people can get to all their household needs, including mass transit, by foot or bike safely within 15 min.</i></p> <p><i>Suggest making a plan to build transit and encouraging walkable retail right now, in 2020. And where we have existing shopping, workplaces, and transit, we need to be building more housing. It should be legal to build a duplex or fourplex by right to ensure that we are building sustainable, complete communities everywhere we would allow construction to occur in the county.</i></p> <p><i>This is not to prohibit single family homes. but areas should not be exclusively for only</i></p>	Sanjida Rangwala Silver Spring, Jenna Bauer	Comment noted

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		<p><i>single family homes. That way lies the path to segregation, inequities, and housing shortages.</i></p> <p><i>We must make room for people of all incomes and means to live in existing communities - all our existing communities- - where housing is a right, and is legal everywhere.</i></p>		
70.	Communities have become highly adept at using the public process to block new housing and solving the county's housing shortage will require a shared vision throughout Montgomery County. (P. 87)	<p><i>This statement is inappropriate and should be removed from the document. Rather than criticizing the right of communities to protect their quality of life and provide input via the public process, planners should listen to the will of the people.</i></p>	Community Coalition Letter; Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights, Ken Bawer for WMCCA	<p>This is not a criticism but a statement on how some communities have used the public processes to block new housing.</p> <p>The draft Plan has multiple policies in the Connectedness chapter of the draft Plan that promote increasing public participation in the planning process, to help the county meet the diverse needs of its population.</p>
71.	Homeowners Association covenants	<p><i>Will HOAs be excluded from ZTAs or will their covenants override?</i></p>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	HOAs cannot override changes to the zoning code, but they can make their covenants more restrictive and prohibit uses.
72.	Definition attainable housing v affordable housing	<p><i>Clarify in Thrive that "attainable housing" does not equal "affordable housing." Attainable housing is a phrase that misleads the non-professional.</i></p>	Jean Cavanaugh, Silver Spring	<p>These two terms are defined in Appendix D: Glossary, on page 145 of the Public Hearing draft Plan. The definition is also clarified in the Thrive FAQ.</p> <p>https://montgomeryplanning.org/wp-content/uploads/2020/06/Thrive-</p>

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				Montgomery-2050-FAQs 6-10-2020.pdf
73.	Use various financing mechanisms to develop affordable housing.	<i>AIM agrees that the MPDU program should be strengthened. In particular, MPDU requirements should be tweaked to incentivize more creation of three bedroom (or more) units. Payments in Lieu of Taxes (PILOTS) should be used where necessary to ensure the development of affordable housing and the HIF should be expanded and leveraged to produce more affordable housing. In that regard, the HIF can be used in conjunction with use of the County's bonding authority both to support new construction and to preserve existing market-rate affordable housing, with particular attention to properties near the Purple Line. The ability of the Housing Opportunities Commission to preserve existing market rate affordable housing should also be enhanced.</i>	James W. Olson, Action in Montgomery	Staff concurs.
74.	Provide affordable housing throughout the county, not just Missing Middle Housing in single-family neighborhoods.	<i>We are also concerned that the draft Plan also barely mentions, much less includes, specific strategies to achieve much needed affordable housing through the County. Despite its stated goals that focus on "Equity" considerations, affordable housing is given short shrift in the draft Plan.</i> <i>CCCCFH has long supported preservation and protection of the "naturally occurring" existing affordable housing units within and surrounding the County's business districts. The Plan's failure to seriously address this</i>	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	The Attainability & Affordability chapter in the draft Plan contains several goals, policies, and actions strategies to support affordable housing, including the preservation of naturally occurring affordable housing. To name a few: strengthening the MPDU program through strategic changes, working with the state on expanding the low-income housing tax credit, expanding the development capacity of mission

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		<p><i>aspect of the County's housing needs over the next 30 years is both glaring and inexplicable.</i></p> <p><i>Instead, a major focus and goal of Thrive Montgomery 2050 is to encourage inclusion of market rate "missing middle housing" in the form of multi-unit housing projects, including duplexes, triplexes, townhouses and apartment units, into what are now single-family residential detached zones throughout the County.</i></p>		driven entities, and expanding homeownership opportunities.
75.	Consider underutilized public lands, colocation and conversion of vacant commercial space to affordable housing.	<p><i>AIM also believes that the proposal to create an inventory of all vacant and underutilized public lands (including parking facilities) is long overdue and should be undertaken, with priority being given to considering the use of such land for affordable housing. Public agencies should also be required to consider possibilities for co-location of affordable housing when deciding to build. In addition, the County should develop mechanisms to encourage and support the development of affordable housing by faith-based institutions and other non-profits. Another potentially useful idea is to encourage adaptive reuse of existing high-vacancy retail and office space, with some of that reuse dedicated to affordable housing.</i></p>	James W. Olson, Action in Montgomery	Staff concurs.
76.	Support creation of diverse housing types.	<p><i>AIM also supports the draft General Plan's suggestion that zoning should be changed to encourage creative housing options such as multi-generational housing, single-room</i></p>	James W. Olson, Action in Montgomery	Staff concurs.

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		<i>occupancy units, shared housing, etc. and that the County should look for ways to further support the creation of accessory dwelling units (ADU).</i>		
77.	<i>Need to end racial, economic, and ethnic segregation to achieve full equity.</i>	<i>Improving conditions in low income and vulnerable communities is not enough. Montgomery County needs to end racial, economic, and ethnic segregation to achieve full equity. This means a mechanism to override NIMBIES who work to keep low-income housing out of their neighborhoods.</i>	Ethan Goffman, Rockville	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
78.	Need smaller housing types to drive down prices	<i>A chief goal of the plan should be to make sure the median price of a home should decline. Montgomery county is already unaffordable, this needs to change. This can be accomplished by adding a greater variety of smaller housing types.</i>	Michael Dutka	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
79.	Expand Missing Middle Housing options to areas other than transit stations	<i>Increase and Diversify Areas for Missing Middle Housing. 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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations, Seth Grimes	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.

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		<i>affordable or attainable by the income cohorts that the Plan seeks to help...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.</i>		
80.	Missing Middle Housing first on vacant and underutilized properties, and then in single family neighborhoods	<i>Montgomery County's single-family home neighborhoods are, along with the Agricultural Reserve, part of our county's jewels. Rather than nibbling away at single-family home neighborhoods, missing middle housing should first be considered on public properties, on underutilized parking lots in commercial areas or current office parks, which may end up being abandoned properties after the pandemic with so many people working from home.</i>	Phyllis Edelman	. In addition to single-family areas near high capacity transit, the draft Plan also recommends considering commercial and public properties near transit for Missing Middle Housing.
81.	Add a map of where Missing Middle housing can be located	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Comment noted. A subsequent study or master plans would be a more appropriate mechanism to delineate areas suitable for Missing Middle Housing than a general plan.

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82.	Need to further define Missing Middle Housing	<i>Here's my thought on Missing Middle - It is not defined in the zoning code yet. Specifically, threeplexes and quadplexes are not in zoning code. Zoning code could add to descriptions of existing Missing Middle building types (cluster housing?, townhouses, duplexes) that they are Missing Middle. I am not sure where small apartment buildings fit it, but they might need a new housing type like "mansion" which might include up to 6 or 8 apartments and have a defined outward appearance that includes house-like features like roof slope, set backs, 30% lot coverage max. I am not sure how to address the look of a building in the Thrive framework. But I am sure that missing middle is not a codified thing. I would like to see missing middle promote reduced lot coverage to allow for green space and tree canopy instead of models that fill a height and FAR and setback envelope. I know I am mixing zoning code and General Plan, but the General Plan can push the zoning code in a better direction.</i>	Jean Cavanaugh, Silver Spring	Staff concurs. The detailed zoning and other regulatory controls for Missing Middle Housing will be addressed through subsequent studies and implementation mechanisms.
83.	Allow Missing Middle Housing countywide	<i>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</i>	Michael English, Silver Spring	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.

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		<i>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.</i>		
84.	Equity Financing instead of Missing Middle Housing for Middle-Income Folks	Thrive Montgomery 2050 poses solutions for low-income residents to live in Montgomery County, but does not address unaffordability for middle-income residents. Municipalities pose that added Missing Middle housing would still be unattainable for middle-income folks. Introducing equity financing, where the risk of depreciation is shared between the lender and borrower. The lender then carries some of the risk but also can gain. However, this could increase the demand for homes without expanding the supply. This could be managed by tying it to new developments.	Robin A. Barr Council member, Town of Somerset	Comment noted. Please refer to the Missing Middle Housing FAQ on more details on Missing Middle housing: https://montgomeryplanning.org/planning/housing/missing-middle-housing/ and refer to policies related to unaffordability to middle-income households under Goal 5.1: Provide and produce housing units that meet the diverse household sizes and needs of all Montgomery County residents in terms of type, size, accessibility, affordability, and location.
85.	Consider Community Land Trusts	<i>For the purposes of creating and preserving affordable housing I think our County should consider ways to limit speculation on land value. While the MPDU program is a great step in this direction, preserving properties in perpetuity through Community Land Trusts would be another strategy to consider.</i> <i>Why I find the CLT strategy particularly compelling is that it enables limited-equity in the sale of residential and commercial properties (based on investments) but prevents inflation beyond this (which is</i>	Hannah Sholder	Staff concurs that the CLTs are an important strategy. Please refer to Action 5.1.9.e: Explore establishing a community land trust to create permanent, affordable homeownership opportunities.

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		<i>largely related to proximity to public assets). This would prevent the flipping of properties as we have seen recently, for example, in frequent numbers in the East Silver Spring neighborhood (which has proximity to a permanently preserved urban farm and downtown silver spring shops).</i>		
86.	Need to address increased racial and economic integration in the County's housing pattern.	<i>More emphasis should be given to the provision of decent housing as a right for all citizens of the County. In addition, the Plan should more explicitly address the need for increased racial and economic integration in the County's housing pattern. As it is today, most areas of the County are highly segregated both racially and by income. One possible step toward remedying this situation would be to amend the zoning code to allow more "missing middle" housing (duplexes, triplexes, fourplexes, cottage courts, courtyard buildings, etc.) to be built throughout the County. The draft General Plan speaks of expanding such housing options near high-capacity transit, but that language should be expanded to reach beyond such zones.</i>	James W. Olson, Action in Montgomery	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
87.	Need for more affordable housing, especially for the homeless.	<i>Montgomery County has always been a place where people want to live. We have nice neighborhoods, great parklands, and among the best public schools in the country. Unfortunately, we do not have enough housing, particularly affordable housing, for all the folks who want to live among these amenities. If we continue to</i>	Don Slater, Silver Spring	Staff concurs.

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		<p><i>have a housing shortage, those who can least afford to live here will be disproportionately impacted and be forced to live elsewhere, typically further away from jobs and services, adding to the traffic and absorbing the additional commuting costs. As long as we have a homeless population, we are not thriving. The county should be actively searching for properties that can be used as housing for those coming out of homelessness. We need to look at how we can turn surface parking lots and former office space into new forms of residential / retail offerings. The MPDU requirement should be increased. This should be happening across all of our currently developed areas, particularly near transit hubs.</i></p>		
88.	Need for more permanent supportive housing	<p><i>There are a few areas where the plan must give greater attention: shelter space, permanent supportive housing, and rental assistance. Thrive 2050 must ensure sufficient planning is dedicated to shelter capacity. Permanent supportive housing is a critical element of the housing continuum to support residents with no to low incomes. We need to ensure sufficient permanent housing stock for these residents. African Americans, Latinx and other people of color are overrepresented in our shelters and affordable housing. We hope the county's racial equity and social justice program will ensure that those who</i></p>	Jeffrey Mosley, Montgomery County Coalition for the Homeless, Coalition Homes	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.

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		<i>are most marginalized will get the attention and resources needed.</i>		
89.	Need for bolder vision to address housing affordability	<p><i>We commend the plan's housing goals and actions around adaptive reuse, incentivizing accessible housing through non-tax incentives, flexible zoning, and financial and administrative help for affordable housing developers. We feel that Thrive can take an even stronger position on housing to ensure that county neighborhoods are affordable to households of all incomes, especially low income households. The need for affordable housing is projected to increase even more especially for households with incomes at or below 50% AMI. In order to meet housing needs, the county must have a bolder vision that goes beyond existing programs</i></p> <p><i>Thrive should include more explicit messaging around subsidized housing and meeting the needs of low income residents through expansion of shelter space, permanent supportive housing, and rental assistance programs.</i></p>	Mary Kolar, Montgomery Housing Alliance	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
90.	Protecting renters from rent increases and evictions	<i>Now that we have talked about getting people into housing, we have to address keeping them in housing and protecting them from rent increases and evictions. The county should adopt rent indexing as a means of stabilizing rental costs. No one should have to face an eviction without legal representation. The county should seriously consider programs to provide</i>	Don Slater, Silver Spring	<p>These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.</p> <p>Please review policies and actions related to financial assistance and counseling, including Action 5.1.9.b:</p>

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		<i>financial assistance and counseling to first time home buyers.</i>		Expand support for county and nonprofit organizations like the Housing Opportunities Commission's Mortgage Purchase Program that provide education and financial counseling on homeownership, especially for low- and moderate-income households and households of color.
91.	Provide Housing for Essential Workers	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan
92.	Benefits and challenges of creating more affordable housing	<p><i>The provision of housing units far lags population growth, resulting in high housing costs. The well-enough-off manage, and we take care of some of the poor, but we harm those in between. These are people who, 40 years ago, would have found reasonably priced housing in Montgomery County. Now, they pay too much, live marginally, or live elsewhere. We are not providing for teachers, health-care workers, first responders, or even our own children.</i></p> <p><i>By transforming our many decrepit commercial properties into livable walkable communities near transit, we would get many wins and few negatives. Wins</i></p>	Mark Pierzchala, Rockville councilmember testifying as an individual	Comment noted.

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		<p><i>include reduced car trips, better transit, lower energy usage, more stormwater management, prosperity, higher tax base, money for school construction, and human-sized communities with local shops. So, what is the problem?</i></p> <p><i>There is a political problem, and it has been around for years. There is a visceral reaction from many homeowners whenever and wherever high-density projects are proposed. Many anticipate more traffic, congestion, and overcrowded schools. Opposition can be loud, ugly, and classist. These opponents vote in numbers and in blocs, and they have long memories.</i></p>		
93.	Naturally Occurring Affordable Housing	<p><i>Leverage Naturally Occurring Affordable Housing. 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.</i></p>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	<p>Please see Goal 5.5 and related policies and actions.</p> <p><i>Goal 5.5: Minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults. (P. 91).</i></p> <p>Also, please see the Planning Department’s recently completed Study on Preservation of Affordable Housing, which discusses Naturally Occurring Affordable Housing. https://montgomeryplanning.org/planning/housing/preservation-of-affordable-housing/</p>

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94.	Naturally Occurring Affordable Housing	<i>In addition, in order to meet the County's affordable and attainable housing goals, we encourage you to increase and diversify the areas for Missing Middle housing as affordable housing is more realistically achievable in areas outside the one-half mile zones around rail and BRT. Also, the Plan should leverage naturally occurring affordable housing options including adaptive re-use of malls and other retail/office buildings which post COVID-19 may no longer be viable for their original and intended use.</i>	Irene Lane, Town of Chevy Chase Councilmember	<p>These comments regarding expanding Missing Middle Housing beyond transit will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.</p> <p>The draft Plan includes policies encouraging the reuse of underutilized commercial properties for housing. Please see Policy 5.1.2 as an example: Increase opportunities for new housing, especially affordable housing, using office parks, shopping centers, and other underutilized properties.</p>
95.	Need for more housing for essential workers and leverage naturally occurring affordable housing options	<i>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.</i>	Andy O'Hare, President, East Bethesda Citizens Association (EBCA)	<p>These comments regarding expanding Missing Middle Housing beyond transit will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan. The draft Plan includes policies encouraging the reuse of underutilized commercial properties for housing. Example: Policy 5.1.2: Increase opportunities for new housing, especially affordable housing, using office parks, shopping centers, and other underutilized properties.</p>

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				<p>The Planning Department’s FAQ on the Missing Middle housing discusses the question of affordability of this type of housing: https://montgomeryplanning.org/planning/housing/missing-middle-housing/</p> <p>Staff notes that the 200k population growth number is from demographic projections done pre-COVID. New projections will be based on 2020 Census numbers when they become available. It's unlikely that this modest rate of growth will change significantly because our population is relatively stable. But if it is reduced, we will still have a housing shortage at various levels of affordability.</p>
96.	Expand MPDU program and affordable housing bonus density, especially near transit	<p><i>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</i></p>	Nina Janopaul, President Arlington Partnership for Affordable Housing	<p>There is no longer a 22% bonus density cap. The bonus density is unlimited and projects that provide 100% MPDUs would receive a 110% bonus density.</p>

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		<i>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.</i>		
97.	Eliminate barriers to Missing Middle Housing	The county should create policies to limit displacement in redeveloping areas. We cannot afford to build out more sprawling exurbs. Eliminating single family zoning countywide is a promising strategy. We need to eliminate barriers to missing middle housing, and parking minimums. I would like to see bolder goals and tactics in the final plan.	Eyal Li, Takoma Park	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
98.	Build More Housing, of More Types, in More Ways Montgomery County needs to build more housing. Declining production and increased development costs have resulted in rising housing costs and an increase in the number of cost-burdened households. Without an appropriate range of housing types at attainable price points, the county will be unable to attract and retain the employment base necessary to support our economic well being. (P. 86)	<i>WMCCA Comment: To say, “Montgomery County needs to build more housing” begs the question, “When will Montgomery County have enough housing?” The current population is now about one million people. Do we want to plan for a county where the population is 10 million or 25 million people? The current draft Plan treats population growth as an expectation, rather than either a desired goal or a potential problem. Job and business growth must only be pursued on a sustainable basis, that is, only if they can be attained without negatively impacting quality of life (including, for example, air and water quality, traffic, and yes, our happiness rating) and without negatively impacting the environmental quality of our natural areas (for example, no stormwater or other</i>	Kenneth Bawer for West Montgomery County Citizens Association	The draft Plan views new residents and new housing as a benefit to Montgomery County. Access to quality affordable and attainable housing should be a right. Putting artificial limits on growth is neither practical nor desirable for several reasons. For example, since we cannot stop people from coming to this region, limiting growth in the county will make housing increasingly more expensive and exacerbate inequities and other issues. Additionally, communities with population decline also typically experience economic decline.

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		<i>water quality impacts, no ecological degradation, etc.).</i>		
99.	The county needs housing growth in transit accessible locations including current and planned rail and bus rapid transit corridors. Predominantly single-family detached houses currently line these transit corridors limited by zoning that only allows only this type of housing. Low to moderate density increases would allow the introduction of more housing types near transit to serve a mix of incomes and household types. (P. 86)	<i>WMCCA Comment: Up-zoning (density increases) in these areas need to be balanced by down-zoning (density decreases) in other areas</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. Decisions to upzone or downzone should be informed by the context and the desire to meet a specific goal. Additionally, downzoning risks limiting the ability of the county to meet its housing supply gap or future infill development opportunities.
100.	Action 5.1.1.a: Expand housing options in detached residential areas near high-capacity transit by modifying the zoning code to allow duplexes, triplexes, and quadruplexes, residential types by-right and with smaller lot areas. (P. 87). Also, Goal 5.2/Policy 5.2.1.	<i>WMCCA Comment: Add, “Any up-zoning must be balanced by down-zoning in other areas of the county.”</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. Decisions to upzone or downzone should be informed by the context and the desire to meet a specific goal. Additionally, downzoning risks limiting the ability of the county to meet its housing supply gap or future infill development opportunities.
101.	Trends and Challenges (P. 13) 7. We are not producing enough housing in accessible locations to meet our needs. While the number of housing units in Montgomery County increased 32% from 295,723 in 1990 to 390,673 in 2018, this increase was lower than the 53% increase in the region. But we cannot continue to rely on a few, high-density Metro station areas to provide enough housing to bring down costs. We need other locations where lower land prices will support low- to	<i>WMCCA Comment: Why are we using the “must keep up with the Jones” mentality? We need to focus on sustainability. If you want to compare us with other parts of the region, we need to ask what has the housing increase in those regions done for their quality of life and the environment. Moving construction to areas with lower land prices has been the driver of suburban sprawl for decades.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. The county is investing in high-capacity transit (Purple Line, BRT) and with that investment, more housing should be considered in those areas to help meet the county’s housing supply needs as well as ensure ridership and to get drivers off the road

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	medium-density residential building types.			
102.	Rent stabilization	Actions should be added on rent stabilization and protecting legal rights of tenants.	Andrew Saundry, Jenna Bauer, Berk Ehrmantraut, Frank Fritz	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
103.	Goal 5.1: Provide and produce housing units that meet the diverse household sizes and needs of all Montgomery County residents in terms of type, size, accessibility, affordability, and location. (P. 87)	<i>WMCCA Comment: Add: "This will take place primarily through the slow conversion of existing housing units without necessarily increasing the total number of housing units."</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees that new housing units are not needed or anticipated. The draft Plan has multiple policies and actions to support increasing the housing supply through new construction as well as adaptive reuse of underutilized and vacant office and retail properties to make sure our housing supply meet the needs of its residents.
104.	Policy 5.1.1. "Encourage the production of a broad variety of housing types to achieve attainable price ranges." (P. 86)	<i>The actions associated with this policy should not only address breaking down zoning barriers, but also other land use regulations that make middle housing types difficult to build.</i>	Jane Lyons for Coalition for Smarter Growth	Staff concurs.
105.	Action 5.1.1.a. (P. 86)	<i>We urge you to include "small apartment buildings," in addition to "duplexes, triplexes, and quadruplexes."</i>	Jane Lyons for Coalition for Smarter Growth	Small apartment buildings are part of the Missing Middle Housing types and should be considered in appropriate locations.
106.	Action 5.1.2.b: Establish incentives to encourage conversion of existing high-vacancy office and retail sites into residential uses through adaptive reuse or redevelopment of the site. Create flexible zoning incentives for conversion of planned and existing office and retail sites to residential uses, including	<i>WMCCA Comment: We object to the concept of "flexible regulations and zoning controls" and "flexible zoning initiatives". We don't have flexible speed limits for a reason. We don't want an officer to say, "The speed limit is 25, but I'll be flexible and make it 45 for you, Mr. Jones." Regulations and zoning controls should be</i>	Kenneth Bawer for West Montgomery County Citizens Association	Thrive Montgomery 2050 is a 30-year plan with broad policy guidance. Regulatory controls should be flexible enough to address changing conditions and enable innovation in development. Flexible zoning incentives would be adopted as part of the zoning code and would provide

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	allowing properties to reallocate their nonresidential Floor Area Ratio to residential use. (P. 87)	<i>fixed, not flexible. The implication is that the Planning Board can change regulations and zoning controls based on a whim or developer influence.</i>		parameters around the conditions in which these incentives can be applied.
107.	Policy 5.1.7: Provide family-sized housing units in new multi-family housing developments.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	All zoning and other regulatory changes needed to implement the recommendations of the draft Plan will be discussed through subsequent detailed studies and master plan amendments.
108.	Regarding Goal 5.2/Policy 5.2.1. Housing for older adults and people with disabilities	<i>The MDOT MTA supports the inclusion of accessible, affordable housing for older adults and people with disabilities near high-capacity transit and encourages Montgomery County to coordinate with the Maryland Department of Disabilities to ensure mutually beneficial efforts.</i>	MDOT	Staff concurs.
109.	Action 5.2.1.b: Provide incentives to encourage county employers and property owners to develop mixed-income housing at employment centers by redeveloping surface parking lots and underutilized property.	<i>Action 5.2.1.b should be expanded beyond just mixed income housing and employment centers. This could apply to the adaptive reuse of office parks such as Rock Spring.</i>	Seth Grimes	Staff concurs and views office parks such as Rock Spring as employment centers.
110.	Goal 5.3. Continue to promote the policy of mixed-income housing development through the implementation of county policies, programs, regulations, and other tools and incentives. (P. 89)	This goal's associated policies and actions are too reliant on the moderately priced dwelling unit (MPDU) program. Montgomery County needs a strategic, targeted approach to intentionally create mixed-income neighborhoods, of which the MPDU program should only be one part.	Jane Lyons for Coalition for Smarter Growth	Comment noted.
111.	Action 5.4.2.a: Explore changes to the zoning code to support the creation of permanent supportive housing units like	<i>The other area of the report we'd like to comment on pertains to the recommendation that the Planning Board</i>	Barry Wides,	These comments will be considered and discussed further during the Planning Board worksessions to

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	Single-Room Occupancy (SRO) or Personal Living Quarter (PLQ) units by-right in all residential and mixed-use zones.	<i>explore changes to the zoning code to support the creation of single room occupancy (SRO) or personal living quarters (PLQ) by-right in all residential zones. Our association has provided input to the county as to how best to regulate and oversee unlicensed single-family rentals, which these SROs and PLQs would be. The county typically does not license these rentals and has nowhere near the resources today to inspect these properties for which an owner does apply for a license. Major increases in county resources and strengthening of the county's rental housing code would be needed to ensure the health and safety of residents of these units.</i>	President, North White Oak Civic Association	inform revisions and reorganization of the draft Plan.
112.	Goal 5.5. Minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults. (P. 90)	<i>This goal should include rent stabilization and just cause eviction in the associated policies and actions.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.
113.	Policy 5.5.12: Use the county's Subdivision Staging Policy to monitor the secondary effects of targeted growth policies, including loss of market-rate affordable housing and displacement.	<i>Policy 5.5.12. The SSP is not the correct vehicle for monitoring growth housing trends.</i>	Dan Wilhelm for Greater Colesville Civic Association	SSP, now called the Growth and Infrastructure Policy, will be one of the mechanisms to track the progress of housing and other goals of the Plan.
114.	Goal 5.5: Minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults. Goal 5.6: Expand housing access through elimination of fair housing barriers and	<i>Goals 5.5 and 5.6. Move these goals to the proposed equity element.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.

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	enforcement of fair housing laws to protect residents from discrimination. (P. 93).			
115.	Goal 5.6. Expand housing access through elimination of fair housing barriers and enforcement of fair housing laws to protect residents from discrimination. (P. 93).	<i>This goal should include a right to legal counsel for people facing eviction in the associated policies and actions.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered and discussed further during the Planning Board worksessions to inform revisions and reorganization of the draft Plan.

Safe and Efficient Travel (Revised-- Theme #3: Transportation and communication networks: connecting people, places and ideas)

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1.	Support for transformative and bold transportation vision and associated goals and policies	<i>The Safe and Efficient Travel chapter addresses the transportation element as required in the LUA. Planning [MDP] staff is pleased to see the county proposes a transformative and bold transportation vision and associated goals and policies that emphasize non-single-occupancy-vehicle (SOV) transportation such as transit, walking, and biking...The Draft Plan effectively integrates planning issues such as safe and efficient travel with economics, equity, and environmental resilience.</i>	Maryland Department of Planning (MDP)	Comment noted.
2.	Safe and efficient travel	<i>In order to provide for this goal, we must work very hard to reduce our addiction to the fossil fuel automobile. Reduced car traffic is one of the keys to success for Vision Zero. Biking and walking are also risky in high traffic areas. For many in our lower income populations, a car is not an option and good bus service is critical. To accomplish this objective, we should build the entire Bus Rapid Transit (BRT) network as quickly as possible. It is likely that the new administration will be more amenable to providing funding for this.</i>	Don Slater, Silver Spring	Staff concurs.
3.	Impacts of aging population on the demands and adaptability of county's transportation network.	<i>Specific to transportation issues, page 73 provides a good summary of major challenges facing the county's transportation system. Planning suggests that the Draft Plan also discuss how the county's increasingly aging population</i>	MDP	These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>(page 16) will impact the demands on and adaptability of its transportation network. The county should also consider a brief discussion of emerging transportation technologies such as shared transportation, zero emissions vehicles, and connected and automated vehicles. These issues and challenges will also influence the development of transportation goals and policies.</i>		
4.	<i>Bus Rapid Transit (BRT), v commuter/express bus service</i>	<i>Page 75 (Goal 4.1): Bus Rapid Transit (BRT), a more frequent bus service for peak and non-peak periods, is different from a commuter/express bus service which focuses on serving peak periods. A commuter or express bus service may be more appropriate for certain potential regional bus services such as to Tysons, VA and Columbia, Howard County. The county may want to add “commuter/express service” in transit policy statements if it is appropriate.</i>	MDP	While staff understands that the operational characteristics of BRT and commuter/express bus service are different, they both can benefit from dedicated transit lanes, which is the focus of Goal 4.1.
5.	Incremental bicycle and pedestrian facility improvements in rural communities	<i>The county may want to develop a policy to address improving walking and biking in rural villages and communities. To assist small towns and rural communities to plan incremental bicycle and pedestrian facility improvements, the Federal Highway Administration published “Small Town and Rural Multimodal Networks,” a resource guide for pedestrian and bicycle facility design guidelines and best practices in a rural setting.</i>	MDP	Thrive Montgomery 2050 as well as the Bicycle Master Plan and forthcoming Pedestrian Master Plan address walking and bicycling conditions countywide.

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6.	First mile/last mile problem	<p>Page 34 – Regarding first mile/last mile problem. The MDOT MTA supports the focus on the significance of non-SOV access to transit.</p> <ul style="list-style-type: none"> Page 34 – Regarding Figure 21: Map of the Bus Rapid Transit (BRT) system. It may be valuable to overlay the existing MARC / WMATA system and stations on this map to further demonstrate the connectivity of the system. 	MDOT	Staff concurs. We will add the Red Line, MARC Brunswick Line and the Purple Line to this map.
7.	Need for a more coordinated effort across all transit modes to produce a greater impact.	<i>Prioritizing transit will have a major effect on equity, the environment, population growth, health, and our economy. The county is making strides, but LWVMC encourages a more coordinated effort across all transit modes to produce a greater impact. Retrofitting an existing environment is difficult and working with our diverse population poses many challenges, but transit will be key to resolving many issues in the coming years.</i>	League of Women Voters of Montgomery County	Staff concurs.
8.	Improving the public transit network will be very costly	<i>The entire general plan is directed toward walking, bicycling, and the use of transit. The use of an automobile is anathema. In order for this to succeed the network served by public buses needs to increase astronomically along with the number of buses. The cost of that is huge. Not long ago there was a move to decrease the number of buses serving various lines due to cost. And now?</i>	Harold Pfohl, Sumner Village	While the intent of the plan is to focus on creating a high-quality walking, bicycling and transit network we recognize that a large increase in bus service will be needed, and that travel by automobile will continue to be necessary for many trips, especially in the suburban and rural areas of the county.
9.	Unrealistic public transit network assumption, negative impacts on lower-income workers	<i>The Thrive Montgomery 2050 Draft Plan's assumption of good public transit is unrealistic.</i>	Lloyd Guerci	We disagree. Lower income residents and employees tend to have less access to automobiles, and so it is

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		<i>The Thrive Montgomery 2050 Draft Plan fails to assure that the needs of lower income workers will be met.</i>		critical that the county invest in high-quality transit, walking and bicycling.
10.	build transit-first, or to build transit in concert with walking and bicycling infrastructure	<i>How one gets around is often one of the most influential elements of how places develop. It is impossible to overstate the importance of people being able to travel by transit, cycle, or foot - individual and public health benefits abound, certainly, as do economic activity and social integration - and so it is imperative that the County focus on creating as equitably accessible and effectively navigable spaces as possible. I'd like to add, however, that one of the missed opportunities is to build transit-first, or to build transit in concert.</i>	Edmund Morris	Staff concurs.
11.	By disincentivizing auto travel and reducing public parking the Plan will exclude people from where they want to be.	<i>To dis-incentivize the use of automobiles the plan proposes to reduce public parking and increase the cost of remaining public parking to market rates. Diversity and inclusion are core to the plan. If people in single-family residential neighborhoods need to walk 15 minutes to bus stop, wait for a bus to downtown Bethesda in order to shop, enjoy dining there or take in a movie the odds are that the plan will effectively have excluded them from Bethesda by making it arduous to get there. How much will the plan exclude people? What are the unintended consequences?</i>	Harold Pfohl. Sumner Village	The intent of the plan is to make travel in the county be more equitable and environmentally friendly and to support a vibrant economy. While travel by automobile will continue to play an important role in Montgomery County's transportation system, deprioritizing private car and prioritizing travel by walking, bicycling and transit is critical to achieving these goals. The plan also puts new growth in walkable centers so more people will be able to walk to local amenities, reducing the need for more parking.
12.	Bicyclists disregard traffic laws	<i>Pedestrian and bicycle safety receives great emphasis. Nowhere is there any plan dealing with the great danger that bicyclists</i>	Harold Pfohl, Sumner Village	Adherence to traffic laws is essential to achieving Goal 4.4 (<i>Eliminate all transportation-related fatalities and</i>

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		<i>pose to others in their nearly complete disregard of traffic laws whether on a street or on a trail.</i>		<i>severe injuries</i>). But the focus on the danger that bicyclists pose to others is not borne out in the data. First, studies have shown that the disregard of traffic laws is not unique to bicyclists and that in many instances bicyclists adhere to traffic laws more than other roadway users. Second, the prevalence of pedestrian and bicycle crashes is decreasing nationally. Tuckel et al found that: “The rate of pedestrians injured in collisions with cyclists has decreased over time. This decline has occurred despite the increase in the number of cyclists in these states during this same time period. Two possible explanations for this decline are: (a) less exposure of children to cyclists, and (b) improvements in the cycling infrastructure.” Finally, Gkekas et al found that while physical contact between bicyclists and pedestrians is still common, this contact rarely leads few injuries.
13.	Pedestrian and bicyclists safety and equity should be assigned as a higher priority	Safety and equity should be assigned as a higher priority; currently they are pretty far down the list. Pedestrian and bicycle injuries are up nationwide and disproportionally impact low income and vulnerable populations. These goals should be front and center.	Kristy Daphnis, Montgomery County Pedestrian, Bicycle, and Traffic Safety Advisory Committee	The draft Plan includes safety and equity goals, specifically in the Safe and Efficient Travel section (Goal 4.4 for safety and Goal 4.6 for equity) but it does not set priorities for any goals. That will be done through subsequent master plans and other implementation mechanisms.

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14.	Need for metrics in the Plan to gauge efficiency	A separate and specific action should be added to create transportation metrics to gauge efficiency. For example, measuring the cost and time differences between transit and car travel per trip, and comparing them across different communities. Adding a more specific time element as a measure of convenience of mobility would put more focus on eliminating long and inconvenient transit trips, which deter people from using transit.	Kristy Daphnis, Montgomery County Pedestrian, Bicycle, and Traffic Safety Advisory Committee	The Implementation section of the plan (page 129 – 130) recommends developing performance metrics within two years of Plan adoption. The transportation analysis conducted as part of the General Plan includes the average travel time between transit and car trips.
15.	Need for a safe and convenient bicycling infrastructure integrated with transit	Cyclist safety is a major issue for residents; Rebecca was struck riding her bike in Downtown Silver Spring. Combining cycling and transit is an effective way to solve the last mile problem: adding bike racks, allowing bikes on the Metro, and increasing the number of protected bike lanes. The county must make a comprehensive interwoven network of protected bike lanes so that all residents can easily connect to rail and BRT.	Nadiya Kutischeva & Rebecca Mann	Staff concurs.
16.	The county must make it easier to take alternate modes of transport and harder to drive.	We are in a climate crisis, and any project to increase driving is climate denial. My family has recently gotten rid of our car, but my mom has been hesitant to bike to Downtown Silver Spring since she was hit by a car last April. If we are serious about getting people out of cars, the county must make it easier to take alternate modes of transport and harder to drive.	Eyal Li, Takoma Park Resident	Staff concurs.

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17.	Discouraging the use of automobiles is not realistic.	<i>Restricting the use of cars only makes life more difficult. People need more routes to work than can be efficiently provided by public transportation. Tradesmen need to use vehicles to get to job sites and parking to do their jobs. Families need cars to transport children to schools and after school sports and other activities. Planning for people involves planning for cars needed by people for shopping, visiting friends and loved ones, and attending churches and other activities.</i>	Quentin Remein for Cloverly Civic Association	The intent of the recommendations is not to prevent or even substantially restrict the use of automobiles. We acknowledge that there will always be some trips that must be made by car. Rather, the idea is to make walking, bicycling and transit significantly more competitive as alternatives to driving than they are today.
18.	Older adults are more dependent upon cars than transit.	<i>Supporting public transit options with an aging community does not make sense, since they depend more heavily on cars.</i>	Andy Leon Harney, Village Manager for Section 3 of Chevy Chase	Staff disagrees. Transit is a critical component of a transportation network, including the elderly, many of whom cannot drive. The key is to continue to improve access to transit so that people with mobility challenges can use it.
19.	Support the Plan's emphasis on public transit.	<i>Unsure if the plan indicates a 15-minute city means not driving but walking. Short driving trips must be eliminated and more transit options would especially benefit the elderly and handicapped who cannot drive. I admire the plan's emphasis on transport. We currently have all the road capacity we need and this plan has great transit goals.</i>	Zach Weinstein, Downtown Silver Spring	Comment noted.
20.	Need dedicated transit lanes to US 29 for the Flash buses.	<i>One of the areas where our community has been shortchanged pertains to transportation. Since the 1981 White Oak Master Plan, there had been recommendations for separated lanes on US 29 for bus transit. While we pleased to see the launch of the Flash bus, we look</i>	Barry Wides, President, North White Oak Civic Association	Staff concurs. The ongoing US 29 Mobility and Reliability study seeks to add dedicated transit lanes to US 29.

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		<i>forward to the County addressing ways the US 29 can be reconfigured to allow the Flash bus by-pass rush hour congestion.</i>		
21.	Support the proposed interconnected web of transportation and green corridors focused on pedestrians and bicyclists	<i>We wholeheartedly support the recommendation for the county to develop an interconnected web of transportation and green corridors focused on pedestrians and bicyclists. We would welcome the opportunity to work with the Planning Board, County Council, and County Executive to identify transportation and green corridors in White Oak and develop an action plan to link stream valleys, natural lands, parks, open spaces with trails for walking and biking and to link Paint Branch and Northwest Branch as described in footnote 1.</i>	Barry Wides, President, North White Oak Civic Association	Comment noted.
22.	The draft Plan disregards the elderly, especially by discouraging travel by private car.	<i>Thirdly, a thorough appreciation of personal "agency" should be a hallmark of the Thrive Montgomery 2050 Plan. Personal "agency" at all levels of development is huge motivational and dignified value that both the individual and many cultures esteem throughout our society. Why would you take away this personal "agency" from our beloved senior population which will make up more than 21% of the County population, just to consign them to living cramped with few transportation options, from jammed buses to potentially crowded thoroughfares? Confinement of living spaces for our seniors is like asking them to live in a group home mentality. Such an honored generation should be appreciated</i>	M. Allen	The draft Plan recognizes that traveling by automobile will continue to be an important part of the County's transportation network. It also recognizes the underinvestment in walking, bicycling and transit over the years and therefore recommends prioritizing improvements in these modes moving forward.

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		<i>for their years of contribution to the Montgomery County tax base and wisdom and knowledge they've conveyed to successive generations. Why would they want to be told that the community they lived in for decades may be re-zoned and they would have to resort to a limited quality of life option? Equally, it's hard to envision a Thrive Montgomery 2050 Plan limited to foot traffic, bicycles and buses when the car made the American Dream a reality and a journey of epic personal evolution.</i>		
23.	Need greater emphasis on public transit and retrofitting existing communities.	<i>In a previous draft of the plan, the largest number of comments were on public transit and “retrofitting existing communities” should be the first priority of improving public transit. In the nearly 30 years I’ve lived in Montgomery County (the length of this plan), public transit has declined, not improved. WMATA bus routes have been cut and headway between buses has increased.</i>	Phyllis Edelman	Staff concurs that improvements to local bus service must be a priority. Policy 4.1.6 states: “Develop and regularly update short-term and long-term bus transit plans. These plans will extend local and regional bus service to underserved communities in Montgomery County, improve reliability, frequency, and span of service and restructure local and regional bus service to integrate with existing and planned rail and BRT.”
24.	Need for public transportation along I-270	<i>Include planning for public transportation along I-270 to access Germantown efficiently.</i>	Martha A. Schoonmaker, and Margaret Latimer	The ongoing Corridor Forward Plan is evaluating transit along the I-270 corridor.
25.	Discouraging the use of automobiles is not realistic.	<i>The Thrive Montgomery Plan recommending reduced usage of automobiles does not recognize the</i>	Quentin Remein, Michele Albornoz, Linda	Staff agrees that people will continue to need to drive to access many destinations. The purpose of prioritizing transit is to make transit,

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		<i>transportation needs and importance of the automobile. We do need to provide for better commuter transportation, but people still need to use cars for shopping, visiting friends, attending evening and weekend activities, and activities in nearby communities not served by public transportation. Many residents, especially low-income residents, have jobs that require them to work in the evenings and night, at locations not served by public transportation. Also they have service jobs that require them to travel to different locations during the day, or need tools and materials that need to be taken to the worksite. The plan disadvantages them by limiting their use of cars and access to parking.</i>	and Gay Mullings	walking and bicycling convenient and attractive so we are not totally dependent upon private cars for all our travel needs. We also need to provide better transit to those who do not have cars or don't want to drive.
26.	Trends and challenges: We need to stop planning for cars and emphasize transit, walking and biking. (P. 21)	<i>WMCCA Comment: We wholeheartedly agree with this.</i>	Ken Bawer for WMCCA	Comment noted
27.	<i>Support the idea of stop planning for cars, and for compact, walkable communities.</i>	<i>[We] applaud the Plan's highlighting the trend/challenge number 9 (page 22), that the County needs to stop planning for cars and should emphasize transit, walking and biking. As we emerge from the COVID crisis, it is even more clear that we will not thrive, transportation-wise, if we do not emphasize non-auto alternatives to get around the County.</i> <i>In addition, the plan's emphasis on equity, means we should be planning and</i>	Peter Gray, Washington Area Bicyclist Association	Staff concurs.

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		<p><i>implementing ideas that allow County residents who cannot afford to use cars, to have reasonable and safe alternatives to the automobile. Moreover, WABA wholeheartedly endorses the Plan's commitment to a compact form of development which will facilitate the use of non-auto modes of transportation by placing more jobs and commercial activities in easier reach of County residents.</i></p> <p><i>As a resident of the Forest Estates neighborhood in Silver Spring, I am very fortunate to be a 10 minute walk from a metro station. But my neighbors and I still lack truly walkable commercial amenities, such as groceries and restaurants which development adjacent to the Forest Glen metro might bring. We also suffer from a lack of safe, walkable and bikeable connections from our neighborhood to the Silver Spring and Wheaton CBDs which are both only a few miles away. The neighborhood's children should also have a safe route to get to the public schools that they attend. These problems could be resolved by a fulsome implementation of Goal 4, including a full buildout of the County Bike Master Plan and BRT implemented along Georgia Avenue.</i></p>		
28.	We must stop planning for cars. Transit, walking and biking are key to achieving the three main outcomes of	<i>This is overstated. As noted before, there are times when cars are more practical. In addition, transit will also be using roads as well as some microtransit options (e.g.</i>	County Executive, 8-14-20 (This comment was	The intent of the statement is not to heavily restrict travel by automobile or even ignore the needs of motorists. Staff acknowledges that

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	strong economy, equity and environmental resilience. (P. 41)	<i>Uber, neighborhood transit) and mail order delivery trucks.</i> <i>Public transit should be prioritized over walking and biking for the non-15 minute travel.</i>	made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require future planning for automobiles. Rather, the statement is intended to shift the focus to planning for people, regardless of whether they travel by walking, bicycling, transit or automobile, and not to continue the planning of the past that was largely focused on travel by automobile.
29.	Stop planning for cars is not a good goal.	<i>A goal of Thrive Montgomery is to stop planning for cars and even to make it difficult for people to get around using a car. This is not a good goal for this Plan. A reasonable and more realistic goal would be to plan more for pedestrians and cyclists and to make it easier for people to move around without using their cars. But the county is too large and too connected with the greater metropolitan area, people are moving within and through the county in so many directions, making trips for so many diverse reasons, that making it hard for them to do so will be detrimental to our residents, the county's economy, and the region as a whole.</i>	Deborah Ingram, Chevy Chase	The intent of the statement is not to heavily restrict travel by automobile or even ignore the needs of motorists. Staff acknowledges that there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require future planning for automobiles. The Plan seeks to shift the focus to planning for people, regardless of whether they travel by walking, bicycling, transit or automobile instead of continuing the past practice of planning largely focused on travel by automobile.
30.	Declining trends in public health and well-being indicate a growing need for a healthier more active lifestyle. ...all residents can benefit from a more active lifestyle supported by a renewed	<i>WMCCA Comment: We agree on the need to emphasize transit, walking, and biking. However, the County has done an extremely poor job of promoting safe walking and biking in the past. Especially in the lower density areas, many roads have</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff acknowledges that the County's walking and bicycling infrastructure needs improvement. The approval of the Bicycle Master Plan in 2018 and the forthcoming Pedestrian Master Plan are intended to create a vision in

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	emphasis on transit, walking, and biking. (P. 23)	<i>no sidewalks or trails alongside them. Even the lack of bicycle racks at retail centers sends the message, “Bikes are not welcome here.” This is not only a public health issue, it is a climate change issue - walking and biking to destinations means less automobile exhaust.</i>		which safe and comfortable walking and bicycling is prioritized. Of course, it will take many years to rectify these past decisions, but these master plans indicate it is a priority for the county moving forward.
31.	Equally useful as opportunities for connection, we must enhance and connect the growth corridors with trails in the stream valley corridors at their intersections to expand active transportation options via walking and cycling. (P. 38)	<i>WMCCA Comment: Trails for bicycles should be built along all existing and planned rail and bus rapid transit (BRT) corridors. Bicycle trails should be separated with jersey-type barriers, for example, to completely shield bicycles from vehicular traffic. Trails in the stream valleys should natural surface only so as to not add to impervious surface coverage.</i>	Ken Bawer for WMCCA, Kathleen Mihm	The Bicycle Master Plan identifies a network of bikeways along all bus rapid transit corridors.
32.	Trends in public health and well-being indicate a growing need for a healthier lifestyle. (P.41)	<i>Better health and well-being are worthy goals, but it isn’t clear how this plan proposes to change what is already on the ground in a county that is mostly built out. We should take a realistic look at how we can provide additional transit, biking, and walking opportunities in areas where it makes sense without conveying the idea that residents living in areas that require trips by car are somehow problematic.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff acknowledges that people will continue to need to make trips by automobile in many areas of the county that are already built out, but we also believe this creates health, equity and environmental challenges for the county.
33.	Start planning for people instead of planning for cars (P. 41)	<i>“Plan for people not cars”, we agree with providing more transit, walking and biking alternatives.</i>	Dan Wilhelm for Greater Colesville Civic Association	Comment noted.
34.	Biking is not practical for most people.	<i>Biking is simply not practical for older residents, residents who must travel some distance to their jobs, residents with disabilities, and residents with young</i>	David S. Forman, Bethesda, Peter Rizik, Josh	Staff agrees that automobiles will continue to be an essential mode of transportation for Montgomery County residents. We also

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		<i>children. Bicycles also do not work well for anyone in adverse weather conditions. Most people cannot walk to buy and carry home a week's supply of groceries on foot or by bike, even if a grocery store is only fifteen minutes away. Indeed, I would bet that every member of the Planning Board lives within 3 miles of a food store. Do any of you regularly bicycle when you buy the bulk of your groceries, or when you drop off and pick up your laundry? I am convinced that if you asked the public you would find that most of us do NOT want to live only in a Complete Community, bicycling to the grocery. A wonderful thing about living in Montgomery County is the great variety of parks, restaurants, entertainment venues, and stores that are more than 3 miles away and not easily accessible by public transport. Automobiles are an essential component of life in Montgomery County.</i>	Silverstein, Randolph Civic Association	acknowledge that bicycling can be more challenging for some types of trips and in some weather conditions. The draft Plan does not propose that every trip should be made by walking or bicycling. It proposes to improve conditions for walking and biking so those who want to walk or bike are able to do so safely.
35.	We must reduce our dependency on automobiles.	<i>The county population must reduce its dependency on automobiles. The county should incentivize the use of mass transit (including busses) and incentivize the use of electric vehicles (EVs) over fossil fuel ones</i>	Don Slater, Silver Spring	Staff concurs.
36.	Good bus service can provide connectivity without having to resort to a car	<i>At the turn of the 20th century, much of the country was farmland and rural commerce centered on the small towns within that landscape. All of those little towns were connected to each other, and often to a larger city, by some kind of rail system. Most of those interurban rail lines are gone, but good bus service can take their place</i>	Don Slater, Silver Spring	Staff concurs.

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		<i>and provide that same level of connectivity without having to resort to a car with one person in it.</i>		
37.	Plan should recognize and refer to Vision Zero plan.	There is no recognition of Vision Zero. We recommend adding additional context setting to connect this master plan to Vision Zero plan, and additional context on the county and state's joint complete streets program and guidance. This discussion would help connect where we are now to where we need to be in the future.	Kristy Daphnis, Montgomery County Pedestrian, Bicycle, and Traffic Safety Advisory Committee	While there are many locations in the General Plan that speak about safety, staff have avoided use of the term "Vision Zero" as this term may change over the next 30 years. These comments will be considered to inform revisions and reorganization of the draft Plan.
38.	Need for more pilot projects and demonstration programs around transit, micro-mobility, and walking and biking	We'd like to see options that would allow for more pilot projects and demonstration programs around transit and micro-mobility, and walking and biking infrastructure	Kristy Daphnis, Montgomery County Pedestrian, Bicycle, and Traffic Safety Advisory Committee	These comments will be considered to inform revisions and reorganization of the draft Plan.
39.	Improve service on MARC Brunswick Line.	<i>We have a hidden transportation gem running through the county in the form of the MARC Brunswick Line. The county should work with MTA and USDOT to provide reverse service, weekend service, and midday service on this line. Like all mass transit, dependable and frequent service quickly creates ridership.</i>	Don Slater, Silver Spring	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft Plan.
40.	Need for a comprehensive transportation plan	<i>We encourage the County to develop a broader approach focused on BRT, specify how transit-centric transportation will be</i>	Andy O'Hare, President EBCA	Staff concurs that many residents will continue to drive, and the public

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		<i>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.</i>		transportation needs to take these considerations into account.
41.	Transit is unrealistic	<i>This Plan expects that Transit is and will be the main form of transportation and this plan goes so far to claim we must stop planning for the Automobile. While these goals may be notable, I suggest they are unrealistic in a 500 square mile County. While relying on Transit as our ultimate mode of transportation we must acknowledge that according to planning data the best years of transit only 5.6% of commuters over the age of 16 rely on buses.</i>	Cary Lamari	Transit works well when density is located around transit stations. The vision of Thrive Montgomery 2050 to construct a network of bus rapid transit corridors and to locate all new future growth around transit stations will result in large increases in transit ridership.
42.	Clarify number of through-lanes	<i>Page 76 and 77 (Refer to Action 4.1.2.a and Action 4.2.2.a): The Draft Plan should add “total” as “the total number of through-lanes” in the action statements, to clarify the accommodation of two through-lanes in each direction of a rail or BRT corridor.</i>	MDP	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft Plan.
43.	Eliminate all slip lanes, diverging diamonds, and cloverleafs.	<i>Goal 4.4 - Add new policy 4.4.5: “Eliminate all slip lanes, diverging diamonds, and cloverleafs.”</i>	Benjamin Ross	This is a very specific recommendation focused on removing specific types of infrastructure and is too detailed for

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				<p>inclusion in Thrive Montgomery 2050.</p> <p>Here is some additional context:</p> <p>Slips lanes: In general, Montgomery County is no longer building slip lanes and is evaluating removal existing slip lanes. However, slip lanes may continue to be needed in instances where intersections are severely skewed.</p> <p>Cloverleaves: In some instances, it may make sense to replace cloverleaves with tighter interchange configurations, such as was recently constructed as part of the I-270 / Watkins Mill Rd interchange project.</p> <p>Diverging Diamonds: There are currently no diverging diamonds in Montgomery County. The Forest Glen Montgomery Hills Sector Plan recommends evaluating a diverging diamond at I-495 / MD 97.</p>
44.	Prioritize BRT corridors for access management planning	<i>Page 78 (Refer to Action 4.4.1.b): Planning suggests that the county prioritize BRT corridors for access management planning.</i>	MDP	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft Plan.
45.	Consider Transportation Demand Management (TDM) strategies	<i>Page 78 (Goal 4.5): Planning suggests that the county consider adding a policy to address the needs of teleworkers, ridesharing and park & ride facilities, and</i>	MDP	The draft Plan supports transportation demand management. These comments will be considered and discussed to inform revisions and reorganization of the draft Plan.

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		<i>other Transportation Demand Management (TDM) strategies.</i>		
46.	Goal 4.5: Eradicate greenhouse gas emissions and dangerous pollutants from the transportation system. (P. 79)	<i>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>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan. The county has set the goal of eliminating GHG emissions by 2035.
47.	Consider all levels of electric vehicle (EV)-ready requirements.	<i>Page 78 (Refer to Policy 4.5.3): The county may want to consider an action item to address all levels of electric vehicle (EV)-ready requirements, i.e., EV-capable, EV Supply Equipment (ES)-ready outlet, and EVES-Installed, for residential, commercial, and public buildings developments.</i>	MDP	Action 6.2.2.b addresses part of this comment. It states: “Expand the inclusion of electric vehicle charging stations for all new development and redevelopment.”
48.	Add “safety, economic, and environmental” to clarify the goals for connected and automated vehicles consideration.	<i>Page 80 (Refer to Policy 4.8.3): Planning suggests adding “safety, economic, and environmental” to the policy statement to clarify the goals for connected and automated vehicles consideration.</i>	MDP	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft. plan.

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49.	The Plan's focus on transit and walkability instead of cars is unrealistic.	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	<p>Staff disagrees. While we acknowledge that the plan is ambitious, we do not think it is unrealistic. Although travel by single occupant vehicles provides utility, there are several negative externalities borne by society that obscure the true cost of automobiles. These includes air pollution, noise pollution, other environmental impacts caused by fossil fuel extraction and impervious surfaces, congestion, and accidents. In part, this plan seeks to develop a planning framework that internalizes these externalities so that the evaluation of the benefits and costs of planning decisions can be better measured and realized. Once such costs are fully realized, we believe the ambitions set forth in this plan become much more viable both from a financial and societal standpoint.</p> <p>Furthermore, equity is a central focus of this plan. In addition to envisioning a more robust transit network, the plan addresses the negative consequences of our sprawling single-family land use pattern by making it more affordable for more people to live closer to regional centers and along transit corridors. Reducing the county's emphasis on</p>

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				<p>single occupant vehicle travel is more equitable than the status quo because historically disadvantaged communities are less likely to own a vehicle and therefore more likely to rely on walking, bicycling, and transit to meet their travel needs.</p> <p>Historically disadvantaged communities are also more likely to bear the brunt of an auto-oriented transportation system with emissions exposure 75% higher among Latino and 61% higher among African American residents respectively than among white residents. Additionally, Hispanic and non-Hispanic Black / African Americans have a 33% higher traffic fatality rates than non-Hispanic White residents.</p>
50.	Focus on developing transit but with a broader approach	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Staff concurs. Specifically, Policy 4.1.6 and Policy 4.1.8 focus on improving local and regional bus service and microtransit.
51.	Specify how an evolution from car-centric transportation to transit-centric transportation will be staged and managed	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Staff concurs. Subsequent planning efforts will be needed to transition from a transportation system primarily organized to serve automobiles to one that effectively serves all modes of transportation. We also recommend adding a policy about pilot projects (see above).

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		<i>parking are of particular interest given the large investment of public funds that would be needed and the uncertainties in obtaining funding.</i>		
52.	Continue to plan for traffic	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	While the intent of the plan is to focus on creating a high-quality walking, bicycling and transit network, we recognize that a large increase in bus service will be needed, and that travel by automobile will continue to be necessary for many trips, especially in the suburban and rural areas of the county.
53.	Transit cannot replace all travel by automobile.	<i>The Thrive Montgomery plan does not take into consideration residents who rely on automobiles for transport to their jobs. While improved commuter transportation is of value, commuter options are not a one size fits all alternative. For example, I often work late hours at my job on Washington, D.C.; I am not comfortable using mass transit late at night and prefer to use my</i>	Patria A. Thomas	While the intent of the plan is to focus on creating a high-quality walking, bicycling and transit network we recognize that a large increase in bus service will be needed, and that travel by automobile will continue to be necessary for many trips, especially in the suburban and rural areas of the county.

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		<i>own automobile. The plan reduces parking options and limits the use of automobiles for residents who rely on them for a variety of activity.</i>		
54.	Reevaluate transit needs in light of lessons from the pandemic	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Staff concurs that COVID-19 has accelerated the transition to teleworking and delivery services. These comments will be considered to inform revisions and reorganization of the draft.
55.	Provide flexibility for future developments.	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	In a rapidly changing world, it is difficult to predict the changing ways in which people will travel in coming years. We recommend updating the Plan regularly to ensure it continues to meet the County's needs. Additionally, the recommendations in the Plan are underpinned by transportation analysis that was conducted in support of the Plan where we evaluated several potential future scenarios, including the mass adoption of autonomous vehicles and teleworking. While we acknowledge that the future is uncertain, our analysis has found that the policies in the draft Plan shift us in the right direction.
56.	Integrate with other jurisdictions from the outset	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities	MDOT controls many of the roads in Montgomery County, but it is the state's policy to defer to local planning efforts. As with any planning

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		<i>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.</i>	and Community Organizations	effort, this plan and subsequent plans and projects will need to be coordinated with our state and federal partners. Maryland Department of Planning was a member of the Technical Advisory Group, and MDOT has commented on the draft Plan.
57.	Accommodate many groups who cannot use mass transit	<i>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:</i> <ul style="list-style-type: none"> • <i>Low income residents;</i> • <i>Senior citizens;</i> • <i>People with many types of disabilities.</i> 	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	The intent of the recommendations is not to prevent or even substantially restrict the use of automobiles. We acknowledge that there will always be some trips that must be made by car. Rather, the idea is to make walking, bicycling and transit significantly more competitive as alternatives to driving than they are today.
58.	<i>Exclusive, dedicated lane for BRT</i>	<i>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?</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	This can be investigated in future planning efforts.
59.	Will lane reductions negatively impact delivery vehicles.	<i>The draft Plan mentions developing a "logistics plan to facilitate increasing volumes of ecommerce-related deliveries." However, downtowns and town centers are slated for more density. How will the increase in delivery vehicles factor into lane</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	This will be the focus of the logistics and curbside management planning efforts recommended in the plan. (Action 4.2.2.b and 4.6.1.a)

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		<i>reduction, parking decreases, and zero emissions?</i>		Additionally, the ongoing “Urban Loading and Delivery Management Study” may be able to answer some of these questions.
60.	Thrive Montgomery 2050 should not promote the use of 5G technology.	<i>The October 2020 draft Plan promotes use of autonomous vehicles and a network of urban sensors, new technologies that would require so-called “5G” radiofrequency cellular networks. The General Plan Update should not promote this highly questionable change. Residents’ input on this major change, along with that of public health experts familiar with the international scientific literature on radiofrequency exposures must be sought and thoroughly examined.</i>	TAME Coalition	The draft Plan proposes to use available technologies in an equitable, sustainable and safe manner.
61.	Walkable, bikeable, transit-oriented communities are healthy communities.	A great sidewalk or bikeway that we don’t build is a lost opportunity to reduce car traffic. We need to start looking at them the same way we look at trees. Walkable, bikeable, transit-oriented communities are healthy communities. They are good for our hearts, minds, souls, friendships, and our planet.	Ronit Dancis, Alain Norman, Silver Spring	Staff concurs.
62.	Consider congestion pricing tools.	<i>The county should find ways to charge for the many problems associated with car use, such as congestion, traffic accidents, and air pollution. Drivers should pay for the problems they cause. If possible, the county should institute a congestion charge. Another alternative would be a county-wide parking fee, since localities tend to provide free parking to get people to patronize their</i>	Ethan Goffman, Rockville	See Policy 4.5.2: (Use pricing mechanisms to deter the use of single-occupant vehicles and encourage more walking, bicycling, and transit use.) and Action 4.5.2.a: (Conduct a study to determine how to apply congestion pricing in Montgomery County, including how to foster equity and distribute the

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		<i>businesses, creating a kind of free-parking bidding war.</i>		revenue to promote walking, bicycling, and transit.)
63.	Discourage SUVs and oversized cars	<i>The county should discourage SUVs and oversized cars, which not only have a disproportionate environmental impact but kill pedestrians at twice the rate of sedans. Perhaps some sort of health impact fee on these vehicles could be implemented? An educational campaign about the problems with SUVs would also be helpful.</i>	Ethan Goffman, Rockville	Staff acknowledges that larger vehicles are disproportionately responsible for environmental impacts and safety impacts, but a successful approach to reducing motor vehicle size is more appropriate at the federal or state level.
64.	We need four transportation networks.	<i>We basically need four transportation networks, one for public transit, one for cars, one for pedestrians, one for bicycles and other small vehicles that go under 15 mph. Cars have by far the greatest environmental and health impact and should stop receiving priority.</i>	Ethan Goffman, Rockville	Staff concurs.
65.	Mention transportation demand management, promoting pilot projects, or the importance of frequent transit.	<i>This chapter still does not mention demand management policies, promoting pilot projects, or the importance of frequent transit — all of which are critical to achieve the outlined vision.</i>	Jane Lyons for Coalition for Smarter Growth	The draft Plan supports transportation demand management. These comments will be considered to inform revisions and reorganization of the draft Plan.
66.	Smart growth can limit or slow increases in the volume of automobile and truck traffic on our roads	<i>I believe that further development in Montgomery County to supply jobs, housing, shopping, restaurants and other commercial establishments is necessary to ensure that the County has sufficient resources to fund the government and for other purposes. However, the manner in which growth is being handled is clearly unsustainable because there is little or no room left to build additional roads for increased traffic. I believe that truly “smart growth” can limit or slow increases in the</i>	Bruce Shulman	Staff concurs.

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		<i>volume of automobile and truck traffic on our roads, which is the key issue in ensuring that Montgomery County is able to grow and prosper in the future.</i>		
67.	Need better public transportation	<i>We need better public transportation. Before my roommate lost her job, she sometimes spent more time in transit than she did at work, despite the fact that her job was a mere seven minute drive from our apartment. People can't sustain their lives like that.</i>	Katie Nolan, Silver Spring	Comment noted.
68.	MDOT SHA is implementing its “Context Driven – Access and Mobility for All Users” guide.	<i>Safety for all users is MDOT SHA’s top priority...MDOT SHA is implementing its “Context Driven – Access and Mobility for All Users” guide that focuses MDOT SHA on creating a safe, accessible, and balanced multimodal transportation system. A core tenet reestablished in this guide is the need to appropriately balance accessibility and mobility...One of the approaches MDOT SHA now is taking is reducing roadway speed in Maryland’s most urban areas, an approach that has been shown to reduce the likelihood and severity of pedestrian crashes... In the near-term, MDOT SHA is evaluating opportunities to implement other low-cost, high-impact proactive treatments such as leading pedestrian intervals, lane reductions, continental crosswalks, right-turn on red restrictions, and improved lighting where appropriate.</i>	MDOT	Comment noted
69.	Transit cannot replace all travel by automobile.	<i>We try to be the type of family you hope to encourage with the Thrive plan. We chose our home to be in a walkable location, and</i>	Susan Spock and Caldwell Harrop, Bethesda	The intent of the recommendation is not to heavily restrict travel by automobile or even ignore the needs

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		<p><i>frequently walk, bike, and take a variety of mass transit. My husband (who signs below with me) has biked to work downtown for 26 years. We can (and often do) walk: 5 minutes to access buses that go to the Metro, Bethesda, and downtown DC; 10-30 minutes to three strip mall centers with a variety of services; 25 minutes to the library; 30 minutes to Friendship Heights & Metro; and 60 minutes to Bethesda. Over the past 35 years, we have owned only one car, except for 10 years when our girls were in school, when we owned two. Our use of a car and other types of travel is shown in a chart attached to this statement, designed to demonstrate that even though we live in a somewhat connected community, we still rely heavily on our car. The draft of Thrive Montgomery 2050 ignores this reality of many people's lives: no matter how much they may walk, bike, or take transit, they still need to use a car, especially in parts of Montgomery County that are much less accessible than ours.</i></p>		<p>of motorists. Staff acknowledges that there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require future planning for automobiles. Rather, the statement is intended to shift the focus to planning for people, regardless of whether they travel by walking, bicycling, transit or automobile, and not to continue the planning of the past that was largely focused on travel by automobile.</p>
70.	Biking may not be a practical commuting option.	<p><i>Bike trail availability may not substantially change commuting patterns, and while good for the powerful bike lobby, may not be a practical commuting option for the overwhelming majority of residents</i></p>	Susan Spock and Caldwell Harrop, Bethesda	<p>Staff concurs that travel by bicycle may not be practical for all trips today. The land use and transportation recommendations in this Plan seek to make walking and biking more practical for many trips, especially trips that are less than 3 miles in length.</p>

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71.	Transit cannot replace all travel by automobile.	<i>Transit will never be reliable, frequent, and universal: It is highly unlikely that various forms of transit other than cars will ever be able to satisfy the needs of people living throughout our large, spread-out county—it is far too expensive for the county to afford.</i>	Susan Spock and Caldwell Harrop, Bethesda	Staff concurs that transit may never be a feasible replacement for all trips in Montgomery County. The land use and transportation recommendations in this Plan seek to make transit more practical for a substantial portion of trips.
72.	<i>Urban areas still need parking for visitors and non-transit travelers.</i>	<i>Urban areas still need parking: While an “urban” center like downtown Bethesda could attract some people to live there without frequent use of cars, it still needs parking for visitors from other areas and for its residents to reach parts of the metropolitan area not conveniently accessed by transit.</i>	Susan Spock and Caldwell Harrop, Bethesda	The recommendations in the draft Plan do not seek to remove all parking, but to reduce the need and amount of parking.
73.	Employers prefer to have parking for their employees.	<i>Employers need to provide easy access for employees: I do not have data on this point, but if I were an employer, easy access, including car travel and parking, would be a priority for me in deciding where to locate. Has the county thoroughly researched the needs of future employers? Job growth is essential to allow the county to thrive.</i>	Susan Spock and Caldwell Harrop, Bethesda	While this may have been true in the past, many employers prefer to locate in areas of the county with limited parking. In fact, the areas of the county with our densest areas have the highest rents.
74.	Reduction in parking is not practical and has unintended consequences.	<i>Traffic congestion before the pandemic was already a problem, and Thrive may help, but will also hurt: Thrive calls for fewer lanes of traffic, and fewer left-turn lanes. While it is important that we be able to cross roads safely, it is also critical that left-turn lanes be used where necessary to prevent serious travel delays. Thrive calls for dramatic reductions in parking, but the lack of parking spaces in areas that need them will back up traffic as drivers circle,</i>	Susan Spock and Caldwell Harrop, Bethesda	The intent of the statement is not to heavily restrict travel by automobile or even ignore the needs of motorists. Staff acknowledges that there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require future planning for automobiles. Rather, the statement is intended to shift the focus to planning for people,

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		<p><i>looking for a space, adding to climate problems. People will not stop driving just because there is no parking. They will become angry and frustrated, or go to another location. The zoning code already restricts parking in ways that are hard to understand and that harm working families. For example, my in-laws live at Fox Hill, a Bethesda retirement community that was approved with so few parking spaces that employees have to park at a nearby church and take a shuttle—certainly not anticipated under the zoning code. Even then, there are so many aides and visitors to the site, and so few spaces, that many people park in fire zones. There is also very poor transit to the site. My easy 12-minute drive would take at least 40-minutes by transit, using two buses and walking—hardly how I would choose to drop off groceries or pay a quick visit.</i></p>		<p>regardless of whether they travel by walking, bicycling, transit or automobile, and not to continue the planning of the past that was largely focused on travel by automobile.</p>
75.	Transit, walking and biking cannot replace all travel by car.	<p><i>We also note that the draft Thrive Montgomery Plan is anti-automobile. That is a noble goal given the need to adopt strategies to thwart climate change. However, the vast majority of county residents of necessity now rely on motor vehicles, and the infrastructure, including a huge mass transit system, are unlikely to exist even by 2050, given the incredible costs and questionable demand. Implementation would necessarily discriminate against large numbers of County residents for whom vehicular travel</i></p>	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	<p>Staff concurs that for many residents and employees there are not alternatives to driving today. The land use and transportation recommendations in the Plan seek to change that.</p> <p>The intent of the recommendations is not to prevent or even substantially restrict the use of automobiles. We acknowledge that there will always be some trips that must be made by car. Rather, the idea is to make</p>

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		<i>is a necessity in circumstances in which walking and biking are not practical.</i>		walking, bicycling and transit significantly more competitive as alternatives to driving than they are today.
76.	Need an even stronger emphasis on mass transit, buses, walking, and biking as the highest priority modes of transportation.	<i>When I moved to Montgomery County, I was excited to live near a Metro station. However, we still ended up relying on my car most of the time because necessities like grocery stores, pharmacies, and preschools were not readily accessible. A 10-15 minute car ride can turn into a 1-2 hour public transit trip. I am excited at the prospect of complete communities, and would like to see an even stronger emphasis on mass transit, buses, walking, and biking as the highest priority modes of transportation.</i>	Jessica Bronson, Gaithersburg	Staff concurs.
77.	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.	<i>The goal of more efficiently moving traffic along densely travelled major thoroughfares should not impact the quality of life in nearby communities. 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.” 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.</i>	Northwood Four Corners CA	Staff concurs.

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78.	Support public transportation, which tends to be more inclusive of people with physical disabilities than bike or walking pathways	<i>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.</i>	Catherine Nardi and Heather Bruskin for MC Food Council	Staff concurs.
79.	If most people have to drive to the Metro station or a bus stop to access transit, transit benefits are diminished. (P. 35) Action 4.3.1.a: Eliminate motor vehicle parking minimums for new development projects in downtowns, town centers, and rail and BRT corridors to encourage travel by walking, bicycling, and transit.	<i>That may be, but there is no other easy way to access transit; and using transit is better than driving to distant areas...If the county wants to promote transit use, it should have parking and drop-offs at Metro stations and major bus stops.</i>	Susan Spock and Caldwell Harrop, Bethesda	While staff supports the provision of drop-off locations at Metrorail stations, we believe that providing commercial and residential space around Metro stations and better bus service is a more cost-effective approach to increasing transit ridership on Metrorail than providing park-and-ride lots. Therefore, park-and-ride lots should be minimized. The exception to this may be terminal stations, which have a much larger catchment area to justify park and ride lots.
80.	Start planning for people instead of planning for cars (P. 42)	<i>This sounds catchy, but it is meaningless. People drive cars and will continue to need cars. Planning for people means planning for cars as well as planning for walking and bikes. Traffic congestion after Covid may return, sucking economic prosperity out of the county.</i>	Susan Spock and Caldwell Harrop, Bethesda	The intent of the statement is not to heavily restrict travel by automobile or even ignore the needs of motorists. Staff acknowledges that there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require

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				future planning for automobiles. Rather, the statement is intended to shift the focus to planning for people, regardless of whether they travel by walking, bicycling, transit or automobile, and not to continue the planning of the past that was largely focused on travel by automobile.
81.	Thrive 2050's vision for the future is that "most people can live without a car and meet daily needs with a short walk, bike ride, or transit trip." (P. 46)	<i>As noted, this might be true in more urban areas, but impossible for people in rural and suburban areas, especially for the elderly, the disabled, and parents.</i>	Susan Spock and Caldwell Harrop, Bethesda	Staff recognizes that travel by automobile will continue to be necessary for many trips, especially in the suburban and rural areas of the county.
82.	Vision for Safe and Efficient Travel. (P. 74)	<i>WMCCA Comment: Define "micromobility".</i>	Ken Bawer for WMCCA	Micromobility is defined in the glossary on page 163 as: Personal vehicles that can carry one or two passengers such as bicycles, electric bicycles, and a variety of scooters.
83.	We simply cannot be equitable, address climate change, and support a strong economy by building more roads. (P. 74)	<i>We suggest replacing "roads" with "highways." Building new roads should be permissible in cases where they improve connectivity of street grids.</i>	Jane Lyons for Coalition for Smarter Growth	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.
84.		<i>Focus on Transit and Walkability (p. 75) – We need to reorient the underlying land use pattern into walkable, bikeable Complete Communities and make transit more accessible to a greater number of people by concentrating all future development in transit-oriented places. I'm assuming this pertains to residential development versus commercial development. If not, this is a Catch-22, further isolating communities that are already isolated.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff concurs. The draft Plan proposes to direct all future growth to transit station nodes along major corridors served by infrastructure and amenities as well as utilize infill development and redevelopment in Complete Communities. The themes of Compact Growth: Corridor Focused Development and Complete Communities will be considered and discussed further during the Planning Board work sessions

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85.		<i>Focus on Transit and Walkability (p. 76, first full paragraph) The county's major roadways.....Great Seneca Highway and Rt. 118 are missing from this list.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff concurs that Germantown Road should be added to the list, as it is now part of the MD 355 BRT project. We disagree that Great Seneca Highway should be added as it is captured in the Corridor Cities Transitway.
86.	New micromobility solutions such as e-scooters and rideshare bicycles will provide new capabilities to solve the first mile/last mile problem to bring reliable daily access to high speed transit. (P. 76)	<i>I cannot see myself or other older residents getting to the Metro either way, as I have osteopenia and can't afford to fall. These are also not good solutions in the rain, heat, snow, or ice, which occur often in this area.</i>	Susan Spock and Caldwell Harrop, Bethesda	Comment noted.
87.	Focus on transit and walkability. These existing east-west corridors include the new Purple Line and the planned BRT along Randolph Road. (P. 76)	<i>WMCCA Comment: Remove Purple line now that construction has stopped?</i>	Kenneth Bawer for West Montgomery County Citizens Association	Thrive Montgomery 2050 is a 30-year plan. The pause in Purple Line construction does not warrant removing it from the plan.
88.	For example, early conceptual planning and regulatory review stages have begun on the proposed highspeed superconducting magnetic levitation (maglev) system between Washington, DC, and Baltimore, and a proposed 35-mile underground tunnel/loop to move electric vehicles between Washington and Baltimore in 15 minutes. (P.76)	<i>WMCCA Comment: The County needs to come out against the maglev project due to the biodiversity, value, history, research and fossils on the federal, state, academic, and city land, refuges, and parklands that almost entirely comprise the footprint for the proposed maglev corporation's trainyards, trainlines, power stations, road realignments, powerline realignments, parking lots, and new roads.</i>	Kenneth Bawer for West Montgomery County Citizens Association	As a 30-year policy guiding document, the draft Plan does not comment on specific projects.
89.	Supporters of regional connectivity have also discussed a Purple Line extension to create suburb-to-suburb connection between Tysons in Fairfax County, VA, and Largo in Prince George's County. (P.76)	<i>WMCCA Comment: Change to "have also discussed a Purple Line extension, BRT, and monorail to create...."</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.

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90.	Encourage people to move closer to their jobs	<p><i>WMCCA Comment: Add new Policy & Action: Encourage people to move closer to their jobs by offering government subsidies for moving expenses, based on need, for people who wish to avoid long commutes by moving closer to their job. Not only would this reduce demand for new road construction, but it would also take cars off the road. Our guess is that this would be less expensive than building/widening roads. It is a given that housing costs increase the closer-in you move. That is one of the trade-offs that someone has to make: a longer commute with a bigger house vs. a shorter commute with a smaller house or apartment/townhouse. The reason we have suburban sprawl was (and is) the lure of less expensive/larger houses coupled with relatively cheap (arguably government subsidized) gasoline and roads. Solving congestion is not a simple problem and there are many variables in the equation. Just to throw out one variable: what if gas was taxed the way it should be (as in Europe), say phasing in a tax of \$1 or more per gallon? This would have lots of possible repercussions: people buying smaller cars, moving closer-in, switching to transit, moving to Virginia (which may not be a bad thing), etc.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association	The draft Plan acknowledges this challenge and seeks to address it with goals and policies throughout the Public Hearing Draft. The plan envisions housing located close to transit, workplaces, needed goods and services, public amenities and active park spaces. This vision is supported by several goals and policies in the Public Hearing Draft, including but not limited to Policy 1.1.1, Goal 2.3, Goal 5.1, Goal 5.2, Goal 7.1 and Goal 7.2.
91.	Goal 4.1: Get people out of their cars and transform Montgomery County into a community of walkable, people-centric	<p><i>Goal 4.1 Delete the first sentence since it is not a goal, but rather an objective. The second sentence is a goal but reword it</i></p>	Dan Wilhelm for Greater	These comments will be considered to inform revisions and reorganization of the draft.

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	places. Make public transit, walking, and bicycling the preferred travel mode for daily trips and substantially reduce the need for personal vehicles. (P. 76)	<i>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.</i>	Colesville Civic Association	
92.	Goal 4.1: Get people out of their cars and transform Montgomery County into a community of walkable, people-centric places. Make public transit, walking, and bicycling the preferred travel mode for daily trips and substantially reduce the need for personal vehicles. (P. 76)	<i>Instead, the goal should be to facilitate all transportation options so that residents can choose the one that works best for them in any given situation. Cars are not the enemy. They are simply a tool for transportation, as are shoes, bikes, buses, and trains. We should not favor one mode of transportation over the others in the plan, especially if doing so requires increasing density in single family neighborhoods to support public transportation.</i>	Robert E. Oshel, Silver Spring	The intent of the statement is not to heavily restrict travel by automobile or even ignore the needs of motorists. Staff acknowledges that there will always be trips that will need to be made by car and we recognize that technologies such as autonomous vehicles will require future planning for automobiles. Rather, the statement is intended to shift the focus to planning for people, regardless of whether they travel by walking, bicycling, transit or automobile, and not to continue the planning of the past that was largely focused on travel by automobile.
93.	Policy 4.1.1: Change the primary function of streets from moving automobiles to moving people and creating great places that are accessible and safe for all roadway users, environmentally sustainable and economically competitive. All rules and regulations regarding how we approve growth should support this approach. (P. 76)	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff concurs. Subsequent amendments to the Master Plan of Highways and local master plans will define the functions of county streets and provide guidance to achieve that balance.
94.	Action 4.1.4.a. Provide dedicated transit lanes as part of the replacement of the American Legion Bridge. (P. 77)	<i>In accordance with the County Council's most recent position, this action should also include engineering the new</i>	Jane Lyons for Coalition for Smarter Growth	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.

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		<i>American Legion Bridge to be able to accommodate heavy rail.</i>		
95.	Action 4.1.1.b: Update the Master Plan of Highways and Transitways to consider whether to remove master-planned but unbuilt highways and road widenings. (P. 77)	<i>This is a noteworthy incorporation of iterative planning that allows the County to revisit previous plans and ensure they are considerate of current conditions and context.</i>	MDOT	Comment noted.
96.	Action 4.1.1.b.	<i>WMCCA Comment: Change to “Update the Master Plan of Highways and Transitways to remove master-planned but unbuilt highways and road widenings, especially the M-83 highway.” M-83 is unneeded, would be environmentally destructive, and takes funds away from mass transit projects.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. As a 30-year policy guiding document, the draft Plan does not comment on specific projects.
97.	Action 4.1.1.b. (P. 7	<i>Action 4.1.1b - Delete “consider whether to”.</i>	Benjamin Ross	Staff disagrees. The purpose of the effort would be to determine whether it is appropriate to remove master planned but unbuilt highways from the Master Plan of Highways and Transitways.
98.	Remove master planned but unbuilt highways and road widenings, especially the M-83 highway.	<i>Stop planning for cars and emphasize transit, walking and biking. Agreed! And in support of this, update the Master Plan of Highways and Transitways to remove master planned but unbuilt highways and road widenings, especially the M-83 highway.</i>	Roberta (rg) Steinman	As a 30-year policy guiding document, the draft Plan does not comment on specific projects.
99.	Remove M-83	<i>[R]remove the proposed M83 Highway, from the Master Plan of Highways and Transitways and other master plans</i>	TAME coalition	As a 30-year policy guiding document, the draft Plan does not comment on specific projects.
100.	M-83 and Montrose Parkway East extension	<i>The Plan calls for examining the potential removal of highways from the Master Plan of Highways and Transitways. The Mid-</i>	John Parrish	As a 30-year policy guiding document, the draft Plan does not comment on specific projects.

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		<i>County Highway extension known as M-83 should be highlighted as an example of why we need to revise the master plan. This highway is a relict of poor planning that would devastate streams, forests, biodiversity and communities. Likewise, the Montrose Parkway East extension from Rockville Pike to Veirs Mill Road should be abandoned and the road right-of-way designated as a greenway park.</i>		
101.	Policy 4.1.2: Plan and implement a high quality transit network that seamlessly connects the county’s downtowns and town centers and regional destinations. Make transit the fastest and most reliable way to get between downtowns, town centers, and rail and BRT corridors. (P. 77)	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff concurs and will add this definition to the Glossary: “High-Quality Transit: Includes rail and bus rapid transit service that is reliable, frequent, fast and comfortable. Generally, the transit service should be so frequent that passengers do not need to consult a schedule.”
102.	Action 4.1.2.b: Develop a strategy to expand commuter rail capacity on the MARC Brunswick Line to provide additional station locations in Montgomery County and provide bidirectional all-day service, seven days a week. (p. 77)	<i>Action 4.1.2.b - Delete “Develop a strategy to”.</i>	Benjamin Ross	Staff disagrees. This was intended to guide the prerequisite analysis needed to make the full recommendation to expand the MARC Brunswick line in the county.
103.	Action 4.1.2.b.	<i>Action 4.1.2.b – Note – expanded commuter rail capacity on the MARC Brunswick Line has been a Chamber priority for decades.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Comment noted.

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104.	Policy 4.1.3: Prioritize safe, connected, low-stress bicycle, and pedestrian networks in downtowns, town centers, rail and BRT corridors, and community equity emphasis areas over projects that increase traffic capacity. (P. 77)	<i>WMCCA Comment: Bicycle lanes must be separated from motor vehicle lanes by structures such as jersey walls. (See photo on p. 75)</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs that bikeways need to be separated from the roadway. Sometimes it is appropriate to use jersey barriers. Other times different forms of separation are appropriate.
105.	Policy 4.1.4: Extend rail and bus rapid transit (BRT) directly to regional destinations such as Tysons and Arlington in Virginia; and Frederick, Columbia, and Downtown Baltimore in Maryland. (P. 77)	<i>Policy 4.1.4. Eliminate rail since it is too costly.</i>	Dan Wilhelm for Greater Colesville Civic Association	The Corridor Forward Plan is considering rail on this portion of I-495 and will determine the feasibility of extending rail to these regional locations.
106.	MDOT MTA is developing a Statewide Transit Plan to provide a 50-year vision of coordinated local, regional, and intercity transit across the state.	<i>Policy 4.1.4 Please note MDOT MTA is developing a Statewide Transit Plan to provide a 50-year vision of coordinated local, regional, and intercity transit across the state. This plan will define public transportation goals and strategies for Maryland's rural, suburban, and urban regions with a vision toward increasingly coordinated, equitable, and innovative mobility. For questions or comments regarding the Statewide Transit Plan, please email mtastp@mta.maryland.gov</i>	MDOT	Comment noted. Montgomery Planning staff is participating in this effort.
107.	MDOT MTA and Virginia's Department of Rail and Public Transportation (VDRPT) conducting a study of Transit Service and Traffic Demand Management (TDM) options across the American Legion Bridge.	<i>Action 4.1.4.a." The MDOT MTA and Virginia's Department of Rail and Public Transportation (VDRPT) are conducting a jointly led study of Transit Service and Traffic Demand Management (TDM) options across the American Legion Bridge with representation from local jurisdictions and stakeholders including Montgomery County and Maryland-National Capital Park and Planning Commission (MNCPPC).</i>	MDOT	Comment noted.

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108.		<i>Consider ensuring that the 2050 Plan goals, policies, and actions support and/or align with the TDM study, especially as it relates to Action 3.2.2.a on page 68, Action 3.7.1.b on page 70, and Action 4.1.4.a on page 76.</i>	MDOT	Comment noted
109.	Policy 4.1.4	<i>WMCCA Comment: Change to “Extend rail and bus rapid transit (BRT) and possibly monorail...”</i>	Kenneth Bawer for West Montgomery County Citizens Association	This is not needed as monorail is a form of rail.
110.	Action 4.1.4.a: Provide dedicated transit lanes as part of the replacement of the American Legion Bridge. (P. 77)	<i>WMCCA Comment: Change to “Provide dedicated transit lanes as part of the replacement of the American Legion Bridge as well as dedicated pedestrian and bicycle lanes so as to connect the C&O Canal NHP on the Maryland side to the Potomac Heritage Trail on the Virginia side. Pedestrian and bicycle lanes on a new bridge have been on the planning books for decades.</i>	Kenneth Bawer for West Montgomery County Citizens Association	This change is already included in the Bicycle Master Plan and MDOT has already agreed to provide this connection as part of the replacement of the American Legion Bridge.
111.	Policy 4.1.6: Develop and regularly update short-term and long-term bus transit plans. These plans will extend local and regional bus service to underserved communities in Montgomery County, improve reliability, frequency, and span of service and restructure local and regional bus service to integrate with existing and planned rail and BRT. (P. 77)	<i>Policy 4.1.6. Eliminate this policy since it is an operational task and doesn’t belong here.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees as this is addressing the policy objective, which is to provide adequate bus transit.
112.	Policy 4.1.7: Reduce single-occupancy vehicle use and incentivize non-auto transportation options by locating most new growth near rail and BRT. (P. 77)	<i>Policy 4.1.7. Eliminate since it is already covered elsewhere in Goal 4.1</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. This policy is not covered in other sections of Goal 4.1.

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113.	Remove microtransit as it consistently fails.	<i>Policy 4.1.8 - Delete microtransit. Microtransit is geometrically unworkable and consistently fails in practice.</i>	Benjamin Ross	While staff acknowledges that some microtransit systems are more successful than others, we do not agree that they are geometrically unworkable.
114.	Goal 4.2: Redesign street systems in downtowns and town centers to be active, people-centric places. Most travel to, from and within these areas will occur via walking, bicycling, and transit. Policy 4.2.1, Policy 4.2.2, Policy 4.2.3, (P. 78)	<i>Goal 4.2 and its policies. The points here are already covered in Goal 4.1 and its policies.</i>	Dan Wilhelm for Greater Colesville Civic Association	While there is some overlap between Goal 4.1 and 4.2, Goal 4.2 and its policies should be preserved because they expand on the transportation vision for the County's Downtowns and Town Centers.
115.	Policy 4.2.1: Expand the street grid in downtowns, town centers, rail and BRT corridors, and suburban communities to create shorter blocks, improve access and transportation system redundancy, and slow the speed of traffic. Use development projects and roadway modifications to provide new street connections.	<i>WMCCA Comment: This is not a good idea. This will result in more miles of impervious roadway, leading to more stormwater runoff, leading to more degradation of stream valleys.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. Completing the street grid is the key to making transportation systems around Downtowns, Town Centers and transit corridors work effectively. A grid street network is more efficient and walkable than a non-grid network and therefore is more sustainable in the long run.
116.	Action 4.2.2.a: Update the Master Plan of Highways and Transitways to limit the number of through-lanes in downtowns and town centers to a maximum of four general purpose lanes and repurpose space for transit lanes, wider sidewalks, bikeways, trees, and stormwater management. Discourage new turn lanes in downtowns and town centers. (P.78)	<i>WMCCA Comment: Add: Bikeways must be separated from motorized vehicles by solid barriers such as jersey walls, not simply low curbs.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff agrees with providing adequate protection to bicyclists but would prefer landscape buffers to jersey barrier type of solutions.

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117.		<i>Action 4.3.1.a applies to downtown areas, but it should be extended to adjacent areas as well, perhaps with the same 15-minute criteria.</i>	Seth Grimes	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.
118.	<i>Market-based parking rates</i>	<i>Page 77 (Refer to Policy 4.3.2): The Draft Plan could include other parking management tools such as on- or off-site shared parking and connecting adjacent retail and business establishments to help manage parking effectively.</i>	MDP	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.
119.	<i>Market-based parking rates</i>	<i>Action 4.3.2a - Rather than market rates, which are depressed by parking subsidies embedded in past policies, parking charges should be at rates sufficient to support the cost of construction and operation.</i>	Benjamin Ross	The particular form this action takes can be addressed when parking rates are studied.
120.	<i>Market-based parking rates</i>	<i>Please clarify how the General Plan's Action 4.3.2.a regarding market-based parking rates can be reconciled with the equity provisions of the Public Hearing Draft.</i>	Josh Silverstein, President, Randolph Civic Association	This would have to be studied in detail as part of the implementation of this action through a subsequent master plan amendment.
121.	<i>Prioritize places with high fatality rates for pedestrian safety measures.</i>	<i>Policy 4.4.3 - The priority for pedestrian safety should be the places with high fatality rates (mostly high-speed arterials), not places with high crash rates (mostly downtowns with heavy foot traffic, slow vehicle speeds, and less serious injuries).</i>	Benjamin Ross	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft.
122.	Best practices and guidance to work toward Vision Zero.	<i>Regarding Policy 4.4.1 and Policy 4.4.3 with respect to transportation-related fatalities and severe injuries and crash locations analysis: The MDOT SHA is advancing plans and policies and implementing best practices and guidance to work toward Vision Zero, especially, since the April 2019 adoption of House Bill 885 that established Maryland as a Vision Zero state. For</i>	MDOT	Comment noted.

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		<i>MDOT, Vision Zero is the umbrella under which numerous safety strategies are housed. One of those strategies at MDOT SHA is Context Driven, which includes the Context Guide, a draft of which was published in September 2019.</i>		
123.	Regarding Action 4.4.1.b: Develop an Access Management Plan.	<i>Please consider adding more detail to this action step. Also consider incorporating a requirement that local developers implement context sensitive design solutions into the County's local area transportation reviews (LATR).</i>	MDOT	Montgomery County has incorporated context sensitive design solutions into its projects and regulatory controls such as Local Area Transportation Review (LATR) for some time. Our draft Complete Street Design Guide will update these standards.
124.	Policy 4.5.1: Incentivize the use of modes other than single-occupant vehicles by providing high quality transit, walking, and bicycling networks. (P. 79)	<i>WMCCA Comment: Change to: Incentivize the use of modes other than single occupant vehicles by providing high quality transit, and safe walking and bicycling networks, both of which are separated from motorized vehicles by solid barriers such as jersey walls, not simply low curbs.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
125.	Action 4.5.2.a: Conduct a study to determine how to apply congestion pricing in Montgomery County, including how to foster equity and distribute the revenue to promote walking, bicycling, and transit. (P. 79) Action 4.6.1.a: Conduct a study to reexamine the travel needs of vulnerable users of the transportation system and create strategies to improve their access to jobs, food centers, age restricted housing, health care, and other services. Prepare an Aging	<i>Please clarify what MDOT's role will be with these studies, if any. Is the County seeking technical assistance or participation?</i>	MDOT	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.

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	Readiness Functional Master Plan to support safe transportation options for the county's aging population and address topics such as transit use, curbside management, and street infrastructure. (P. 80)			
126.	Goal 4.6: Create an equitable transportation system that provides affordable and accessible travel options to jobs, education, and services. (P. 80)	<i>Goal 4.6. Eliminate since actions dealing with funding priorities and fares don't belong in this document.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
127.	Goal 4.7: Convert auto-centric transportation corridors into safe, people-centric multimodal streets with rail and BRT. Most travel to, from and within transportation corridors will occur via walking, bicycling, and transit. (P. 80)	<i>Goal 4.7. Eliminate since it is already covered under Goal 4.1</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. While there is some duplication, the idea was to provide a specific goal about transportation corridors, as this is a major theme of Thrive Montgomery 2050.
128.	Goal 4.7.	<i>Goal 4.7:Most travel to, from and within transportation corridors will occur via walking, bicycling, and transit – This is an “urban-centric” goal that doesn’t meet the reality of our existing communities.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff concurs that this doesn't meet the reality of many existing communities. The draft Plan proposes changes both to the transportation network and the land use along transit corridors.
129.	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.	This only makes sense if enough people can live near their jobs – which is not feasible for at least some significant subset of the population. Mass Transit projects require viable roads and are most efficient in transporting more people.	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff disagrees. If all future growth is going to be in transit corridors, we will need to increase investment in safe and connected low-stress bicycle and pedestrian networks to make them more attractive than private car travel.
130.	Rustic roads	<i>Add the following policy and action:</i>	Robert J. Tworkowski,	These issues will be addressed in the update to the Rustic Roads

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		<p><i>Policy 4.7.3: Ensure that the system of designated rustic roads is protected and maintained to preserve important historic, cultural, and natural features enabling a strong agritourism benefit to both farms and residents.</i></p> <p><i>Action 4.7.3.a: Montgomery County Planning Department in coordination with MCDOT, the Rustic Roads Advisory Committee, and producers and advocates for the Agricultural Reserve, review and recommend safety measures, such as reduced speed limits, for rustic roads and all roadways in the Agricultural Reserve with the goal of increasing safe travel for bicyclists and pedestrians, while continuing to protect rustic roads.</i></p>	Chair, Rustic Roads Advisory Committee	Functional Master Plan currently underway.
131.		<i>This plan should define the County's transit choices, and not merely be a laundry list of possible projects.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	While the draft Plan highlights a few major projects, its focus is to identify goals and policies to improve the County's transportation options, including transit.
132.	A grid street network may hinder with fire and rescue operations. (Goal 4.1)	<i>The policy recommendations for realignment and reconfiguration of roadways to accommodate increased pedestrian and bicycle traffic may negatively impact fire-rescue response times by inadvertently increasing vehicular traffic and congestion, while the narrowing</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals,	Staff disagrees. There is sufficient literature and physical evidence to demonstrate that a grid street network and realignment and reconfiguration of roadways to accommodate increased pedestrian and bicycle traffic safely can be done

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		<i>of roadways will make turns more difficult for large fire-rescue apparatus. Similarly, the proposal for “a grid of streets and alleys” and smaller blocks with more crosswalks could also hinder response times.</i>	Policies and Actions)	without negatively impacting fire and rescue operations.
133.	Goal 4.1: Get people out of their cars and transform Montgomery County into a community of walkable, people-centric places. Make public transit, walking, and bicycling the preferred travel mode for daily trips and substantially reduce the need for personal vehicles. (P. 76)	<i>The priority goal of the public transportation system is to get residents to their jobs and schools. There is interest in including schools in the Complete Communities by repurposing office buildings, but no clear plans for jobs.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Complete communities, including the characteristics and elements of urban, suburban and rural complete communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
134.	Policy 4.1.2: Policy 4.1.2: Plan and implement a high quality transit network that seamlessly connects the county’s downtowns and town centers and regional destinations. Make transit the fastest and most reliable way to get between downtowns, town centers, and rail and BRT corridors.	<i>Should we be capitalizing on our Amtrak access more? Do our Amtrak stations have significant needs? Are there positions we can advocate for toward improving the Capitol Limited service? Even if the plan ultimately doesn't suggest significant changes to the County's Amtrak access, it should at least acknowledge that it exists.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	At this time we do not see an intercity travel via Amtrak along the Capitol Limited corridor as a significant benefit to Montgomery County.
135.	Policy 4.1.2	<i>Need to ensure this recognizes the need for bus depots & transit centers (particularly in locating & acquiring ROW). This should establish that a future Transit Functional Plan will identify these locations, for inclusion into future area master plans.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	This could be addressed in an update to the Master Plan of Highways and Transitways.

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136.	Policy 4.1.2	<i>Young millennials – due to the WMATA struggles and the advent of Uber and other transportation options – have largely abandoned the use of metro. This has significant implications for our future use of mass transit. This should be addressed.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Comment noted.
137.	Action 4.1.2.b: Update the Master Plan of Highways and Transitways to reexamine whether to create additional rail and BRT corridors and to upgrade master-planned BRT corridors to run in the median by repurposing existing travel lanes.	<i>IMPORTANT--Should not specify median. Policy 4.7.2 reads *preferably* in the median. This would be better language here.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
138.	Action 4.1.2.c: Extend rail and/or BRT directly to Tysons and Arlington in Virginia; and Frederick, Columbia and Downtown Baltimore in Maryland.	<i>What is the expectation of connections to Baltimore? Would this be more along the lines of Express Bus via I-95? It would be difficult to implement BRT (and especially rail) unless managed lanes are included along I-95, which this phrasing might imply support for. Consider rephrasing if that is not the intent, or clarifying how else this might be achieved.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The exact nature and type of service will be determined through subsequent studies and master plans.
139.	Action 4.1.2.b: Develop a strategy to expand commuter rail capacity on the MARC Brunswick Line to provide additional station locations in Montgomery County and provide bidirectional all-day service, seven days a week.	<i>Consider expanding this action item with a suggestion that the Brunswick Line be considered for through-running into Virginia.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals,	Action 4.1.4.a was intended to capture this.

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			Policies and Actions)	
140.	Policy 4.1.4: 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.	<p><i>This needs to establish a clearer implementation vision for low-density areas. I suggest defining the intent of shifting vehicle trips to transit as far upstream in a trip as able. As discussed w/ MNCPPC on 6/4/2020, consider a vision that supports the bullets below. The 2nd and 3rd bullets may affect the phrasing of Policy 4.1.4.</i></p> <ul style="list-style-type: none"> • <i>Serve high-density areas (Red/Orange Policy Areas) with high-intensity transit & walking/biking access. Strengthened public parking programs (PLDs) in Downtowns and Town Centers should focus on catching auto users at the periphery.</i> • <i>Serve lower-density areas (Orange/Yellow Policy Areas) with micro-transit, bikeways, &/or Bike & Ride facilities to concentrate these areas' ridership into the higher-intensity stops along a high-intensity transit network.</i> • <i>Serve lowest-density areas (Green Policy Areas) with Park & Ride facilities at regional upstream points: likely focusing on in-line facilities along interstates / major highways, but not excluding the potential for neighborhood / area-focused P&Rs. Should encourage out-of-County P&Rs.</i> 	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	While a policy to “serve lowest-density areas (Green Policy Areas) with Park & Ride facilities at regional upstream points” may have some success at removing auto trips from downstream roads, our concern is that it would also encourage longer trips.

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141.	Goal 4.2: Redesign street systems in towns and town centers to be active, people- centric places. Most travel to, from and within these areas will occur via walking, bicycling and transit.	<i>Transit should be the highest priority since it has the potential to move the most people the most distance most cost-effectively. This order should be changed.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	This goal was not written to prioritize one mode over the other. Achieving great walking, bicycling AND transit is critical to achieve high-quality downtowns and town centers.
142.	Action 4.3.1.a: Repurpose on-street parking and public parking facilities to other uses such as space for walking, bicycling and transit, stormwater management and street trees.	<i>To the extent that utility relocations are required, costs could be significant.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Comment noted.
143.	Action 4.3.1.b: Eliminate parking requirements for new development projects in downtowns, town centers and rail and BRT corridors to encourage travel by walking, bicycling and transit.	<i>If this is done, negative neighborhood impacts need to be mitigated.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff concurs.
144.	Goal 4.5: Eradicate greenhouse gas emissions and dangerous pollutants from the transportation system.	<i>There are no policies or action items that address non-vehicular contributors, such as construction (particularly the production of concrete/cement and asphalt) or the waste and recycling of vehicles, tires, batteries, etc. Without these actions: we will fail to</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals,	These recommendations are outside of the scope of the General Plan, which is a high-level policy.

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		<i>eradicate GHGs & dangerous pollutants from the transportation system.</i>	Policies and Actions)	
145.	Policy 4.5.3: Facilitate the mass adoption of zero emission vehicles.	<i>Should include an action item for electric charging infrastructure.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The Healthy and Sustainable Environment chapter includes this action: "Action 6.2.2.b: Expand the inclusion of electric vehicle charging stations for all new development and redevelopment."
146.	Action 4.5.3.b: Update all county fleets and contracted fleet providers to zero emission vehicles.	<i>The Executive supports the goals of reducing emissions and currently has several initiatives underway including EV vehicles towards meeting 2040 climate goals. Updating public and private fleets to zero emission vehicles is an aggressive objective that may not be feasible.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Staff concurs that this is an aggressive objective. We note that the Draft Climate Action Plan also supports this recommendation with its target of "100% electrification of transportation options, including all private and public vehicles (for example, cars, trucks, buses) by 2035."
147.	Action 4.6.1.e: Provide low-cost transportation for low-income populations through transit fare and toll policies.	<i>Unclear what level of subsidy is to be considered. Would need to know that to adequately provide fiscal information.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Thrive Montgomery 2050 is a high-level policy plan that does not estimate costs because that would be part of subsequent planning and other implementation efforts.
148.	State should be a partner for county's transportation needs. Address existing interstate highways	<i>Page 80 (Goal 4.8): o Please add "the state" in policy statements to indicate the state should be a partner for county's transportation needs.</i>	MDP	Staff concurs. These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>o The Draft Plan could include a policy to address existing interstate highways. Although the system is operated and maintained by the state, a county policy would help the state to develop plans for future improvements. Since the county is shifting its transportation focus on transit and non-single occupancy vehicle transportation, perhaps, the county will promote a multimodal transportation system and emphasize people, instead of the vehicle, throughout the interstate highway system in the county.</i>		
149.	Goal 4.8: Create a seamlessly integrated regional transportation system by coordinating transportation planning within the region and between neighboring jurisdictions. (P. 81)	<i>The MDOT MTA supports the focus on integration between systems and throughout the region.</i>	MDOT	Comment noted
150.	Goal 4.8	<i>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 north of Montgomery County.</i>	Dan Wilhelm for Greater Colesville Civic Association	The Plan does not recommend creating another COG; it recommends M-NCPPC and Montgomery County to be more active in transportation planning in the region.
151.	Action 4.8.2.a: Form a subregional transportation or transit authority, such as the Northern Virginia Transportation Authority, that would include Montgomery County and Prince George's County, among others. (P. 81)	<i>Action 4.8.2a - Delete. This already exists in the Washington Suburban Transit Commission. Creation of a regional road-building authority would be directly contrary to the plan's aim of shifting transportation priorities.</i>	Benjamin Ross	These comments will be considered to inform revisions and reorganization of the draft Plan.
152.	Policy 4.8.3: Assemble a regional coalition of jurisdictions and other stakeholders to guide transportation	<i>MDOT leads the statewide Maryland Connected and Automated Vehicle (CAV) Working Group, where all stakeholders can</i>	MDOT	Comment noted.

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	technological change related to connected and autonomous vehicles in a way that supports our goals and that addresses the needs of disadvantaged populations.	<i>learn about CAV initiatives within the state and companies can submit an expression of interest form to test AVs in Maryland. For more information please email cavmaryland@mdot.maryland.gov.</i>		
153.	Action 4.8.1.b: Assemble a regional coalition of jurisdictions and other stakeholders to guide transportation technological change related to connected and autonomous vehicles in a way that preserves our values and that addresses the needs of disadvantaged populations.	<i>What does “preserves our values” mean?</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Preserving the county’s environmental, racial and social equity, and safety goals while making sure the needs of disadvantaged populations are adequately addressed.
154.	Policy 4.9.3: Design streetscapes to mitigate disruption from climate change, manage stormwater effectively, and provide tree canopy for shade and habitat. (P. 82)	<i>WMCCA Comment: Add: Managing stormwater effectively in streetscape designs will eliminate the need for the destructive practice of so-called “stream restorations” in stream valleys.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.

Diverse and Adaptable Growth (Revised-- Theme #1: Compact growth: corridor-focused development)

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	Coordination with MDP on implementation of food related policies.	<i>Planning [MDP] is interested in following the implementation of the Draft Plan's goals, policies, and actions for the Agricultural Reserve and the food system, because the county's experience could provide best practices for other counties to emulate.</i>	MDP	Montgomery Planning welcomes the opportunity to collaborate with the Maryland Department of Planning through the implementation of Thrive Montgomery 2050.
2.	Include a reference to Growth Tiers Map.	<i>Since this is a full comprehensive up-date to the general plan, and explicit incorporation of the Growth Tier Map into comprehensive plan is unclear, Planning [MDP] suggests that a sentence be added under Other Regulations (page 127), that says "The official map displaying the Growth Tier areas is included in Chapter 50, Section 50.4.3 of the Subdivision Regulations and is adopted by reference into Thrive 2050 in accordance with the Maryland Sustainable Growth and Agricultural Preservation Act of 2012."</i>	MDP	Comment noted. The draft Plan addresses Senate Bill 236 (SB 236), which requires local jurisdictions to map and adopt specified growth tier, on page 130.
3.	The need to accommodate new growth.	<i>WMCCA Comment: There is too much emphasis on the need for new growth. It is never explained why growth is good for existing residents. What kind of growth are we talking about: jobs, population, number of buildings, etc.? The emphasis should be on sustainable growth.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Montgomery County along with other jurisdictions in the region proactively plan for the expected future growth to make sure it is done in a sustainable manner consistent with the jurisdiction's vision and aspirations. Putting artificial limits on growth is neither practical nor desirable for a number of reasons. For example, since we cannot stop people from coming to this region, limiting growth in the county will make housing increasingly more

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				expensive and exacerbate inequities and other issues. Additionally, communities with population decline also typically experience economic decline.
4.	Reorganization of the report and the section on Agricultural Reserve.	<i>This chapter, placed toward the end of the plan, doesn't add much that hasn't already been said. We believe it would be most beneficial for this section to focus on the policies that support diverse and adaptable growth — including the county's tax regime, review/permitting processes, and adequate public facilities ordinance — in addition to the Agricultural Reserve. Moreover, most of this chapter is focused on the Agricultural Reserve without making a strong argument about how it should be used in the future. How can the Agriculture Reserve best help us meet our environmental, health, land use, economic, and food production goals, and balance those interests?</i>	Jane Lyons for Coalition for Smarter Growth	Based on feedback from both the Planning Board and the public, the draft Plan will be significantly reorganized. These comments will be considered to inform revisions and reorganization of the draft Plan.
5.	Limit the number of parking spaces in building garages.	<i>If the County is to grow and traffic to be limited, the areas around Metro stations and other mass-transit facilities must be built up in a manner that encourages people to live, work, shop and entertain themselves within walking distance. The above idea can be implemented by limiting the number of parking spaces in building garages.</i>	Bruce Shulman	Staff concurs. Goal 4.3, as well as Policies 4.3.1 and 4.3.2 in the Public Hearing Draft specifically seek fewer parking spaces and effectively managing the spaces that remain.
6.	Vision--Flexible.	<i>WMCCA Comment: We object to the concept of "flexible regulations and zoning</i>	Kenneth Bawer for West	Staff disagrees. As a 30-year plan, there will be unexpected

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	Residents have a variety of choices when selecting their preferred community setting and housing type. The bulk of new residents live in more dense, urban areas. Concentrating new growth in already developed areas makes the best use of the county's available land and infrastructure, and helps to protect the environment. Flexible regulations and zoning controls result in a vibrant mix of residential and commercial uses. (P. 47)	<i>controls." We don't have flexible speed limits for a reason. We don't want an officer to say, "The speed limit is 25, but I'll be flexible and make it 45 for you, Mr. Jones." Regulations and zoning controls should be fixed, not flexible. The implication is that the Planning Board can change regulations and zoning controls based on a whim or developer influence.</i>	Montgomery County Citizens Association	opportunities and challenges, such as the current COVID-19 pandemic or the effects of climate change. Due to the long-term nature of the plan, some level of flexibility will be necessary to harness opportunities and address challenges as they arise.
7.	Need more data based on an updated Demographic Projections Round 9.1 from COG to assess water and sewer needs.	Throughout the Plan, reference is made to focusing on infill and redevelopment. WSSC Water cannot comment on the impact that this policy will have on the capacity of the water and sewer systems which serve the County without specific data provided. This data would need to include an update from the latest COG Demographic Projections Round 9.1, broken down by Transportation Area Zones that reflect the increase in business and housing proposed from the latest 2045 Round 9.1 projections. Piecemeal Sector plans do not allow for a comprehensive county-wide analysis required. If such data is available, please know that it will take several months for us to analyze using our computerized hydraulic models of the water and sewer systems if our budget allows.	WSSC Water	Comment noted. Montgomery County participates in the COG forecasting process, which periodically updates the region's growth forecasts to reflect all factors affecting growth including master plan amendments. As a county-wide, long-range plan, Thrive Montgomery 2050 will not include detailed data on households and jobs by TAZs. This data will be provided with subsequent master and sector plans and reflected in the future COG comprehensive forecasts.
8.	Goal 7.1: Focus growth on infill development and redevelopment	<i>Goals 7.1, 7.2 and 7.3 should be deleted since the subject is already covered in under the Complete Communities element.</i>	Dan Wilhelm for Greater Colesville Civic Association	Based on feedback from both the Planning Board and the public, the draft Plan will be significantly

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	<p>concentrated around rail and BRT.</p> <p>Goal 7.2: Transform land uses surrounding rail and BRT corridors to accommodate future population growth and varied lifestyle preferences in attractive, walkable, and mixed-use communities.</p> <p>Goal 7.3: Manage growth and development as a mature, built-out county by maximizing use of constrained land and identifying innovative solutions to deliver public facilities and infrastructure.</p>			reorganized. These comments will be considered to inform revisions and reorganization of the draft Plan.
9.	<p>Goal 7.2: Transform land uses surrounding rail and BRT corridors to accommodate future population growth and varied lifestyle preferences in attractive, walkable, and mixed-use communities. (P. 111)</p> <p>Policy 7.2.2.c (P. 111)</p>	<p><i>Goal 7.2 – Urban-centric doesn’t address the reality of existing neighborhoods. Action 7.2.2.c – How?</i></p>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff concurs that draft Plan should further describe urban, suburban and rural Complete Communities as well as provide guidance for the areas not located along major corridors or within Complete Communities. These comments will be considered to inform revisions and reorganization of the draft Plan.
10.	The plan needs to provide for all land uses in Montgomery County	<p><i>Changing the plan for development into an urban county does not recognize the single-family land uses, small business and commercial land use, the agricultural land uses, and the open space spaces land uses. The plan needs to provide for all land uses in Montgomery County.</i></p>	Quentin Remein, Michele Albornoz, Linda and Gay Mullings	Staff disagrees that the Plan does not recognize single-family and other uses mentioned in the comment. However, staff recognizes that draft Plan should further describe urban, suburban and rural Complete Communities as well as provide guidance for the areas not located along major corridors or within

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				Complete Communities. These comments will be considered to inform revisions and reorganization of the draft Plan.
11.	Divers and Adaptable Growth Chapter	<i>Title. The title for this element needs to be changed to Agriculture Reserve.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
12.	Apply a food system lens to each of the plan elements.	<i>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.</i>	Catherine Nardi and Heather Bruskin for MC Food Council	Staff concurs and has included many of the Food Council's suggestions in the draft Plan.
Location of growth				
13.	List some of the transit stations where growth will be focused	<i>It may be valuable to explicitly list some of the transit stations where growth will be focused, the connections between them, and the existing network of major corridors.</i>	MDOT	The exact location of transit stations will be determined through subsequent master plan amendments.
14.	Concentrating all new growth along transit corridors could diminish housing and employment choices.	<i>The one question we raise, is the statement at page 38 referring to concentrating "all new growth" along transit corridors. This seems to be a bit of an overstatement given the diversity of housing and employment choices affected by societies since the beginning of time. While there have been ebbs and flows with respect to interest levels in urban, suburban and rural locations, each has its followers, and all are necessary.</i>	Griffin Benton, MBIA	Thrive Montgomery 2050 seeks to accommodate future growth in urban, suburban and rural locations, but proposes to direct this growth to transit station nodes along major corridors served by infrastructure and amenities. This will add to the diversity of housing and employment choices in the county, not diminish them as many suburban and rural communities will not be affected by

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				concentrating future growth along transit corridors.
15.	Need more emphasis on job growth in upcounty areas north of Shady Gove.	<i>Highlight the opportunities and need for business growth and development north of the Shady Grove Metro – bringing jobs to where people live. Without alternatives in place, “We Must Stop Planning for Cars,” disadvantages the Upcounty and other regions which were developed when a different culture and philosophy of growth was at work.</i>	Martha A. Schoonmaker, and Margaret Latimer.	Thrive Montgomery 2050 seeks to accommodate future growth in urban, suburban and rural locations, but proposes to direct this growth to transit station nodes along major corridors served by infrastructure and amenities. These comments will be considered to inform revisions and reorganization of the draft Plan
16.	Silver Spring should be the focus of future attempts to bring major projects to the county.	<i>Silver Spring is at the hub of Metrorail, numerous buses, MARC, and the future Purple Line. This means that it should be the focus of future attempts to bring major projects, such as the bid to bring Amazon to Montgomery County. For instance, MARC would make it easy to live in Baltimore and work in Silver Spring, a strong selling point for future projects.</i>	Ethan Goffman, Rockville	Comment noted.
17.	Growth around metro stations and mass-transit facilities	<i>If the County is to grow and traffic to be limited, the areas around Metro stations and other mass-transit facilities must be built up in a manner that encourages people to live, work, shop and entertain themselves within walking distance.</i> Limit the number of parking spaces in multifamily buildings very close to transit, construct multi-purpose buildings containing retail on the lower floors,	Bruce Shulman	Staff concurs. Goal 4.3, as well as Policies 4.3.1 and 4.3.2 in the Public Hearing Draft specifically seek fewer parking spaces and recommend effectively managing the spaces that remain.

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		offices in the middle and housing at the upper levels.		
Agricultural Reserve				
18.	Commercial solar in the Ag Reserve	<i>While the October draft Plan has strengthened the support for the Agricultural Reserve overall, there remains the need for much greater review and input from producers in the Ag Reserve. The Council's and Planning Board's support for commercial solar in the Ag Reserve must be reversed, since solar developers are offering tenfold and greater land rents, and farmers are being priced off of the land they now farm.</i>	TAME Coalition	The proposed solar farm zoning text amendment is undergoing a separate review process outside of the scope the Thrive Montgomery 2050 development process.
19.	Policy 7.4.3: Increase public awareness of the agricultural, environmental, and economic benefits of the Agricultural Reserve and better connect communities throughout the county to this vital resource through public education and outreach, school programs, and fostering agritourism and ecotourism.	<i>Policy 7.4.3 The government should not be in the business of increasing public awareness, except as part of MCPS education.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. The Agricultural Reserve has successfully preserved farming, farmland and rural open space as well as protected natural resources and provided opportunities for local food production and carbon sequestration. Increasing awareness of this valuable resources is necessary to its retention and enhancement in the next several decades.
20.	Need more emphasis and specificity in protecting the Agricultural Reserve.	<i>The plan lacks a complete analysis and policy recommendations on the pros and cons of continuing or changing the systems in place in the Agricultural Reserve. Reserve stakeholders have frequently expressed concern regarding the absence of specificity in long-term commitments to protect the Reserve in the</i>	Denisse Guitarra for Audubon Naturalist Society	Thrive Montgomery 2050 is a long-range plan that defines the basic land use setting and context for the next 30 years. More detailed analysis and specific recommendations to implement the broad policy guidance for the Agricultural Reserve should be included in a subsequent amendment

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		<p><i>Thrive 2050 update, and Planning should address that need proactively.</i></p> <p>Also need net zero forest loss, net zero buildings, stronger climate change policies, and metrics and implementation.</p>		to the Master Plan for the Preservation of Agriculture and Rural Open Space .
21.	Rustic roads	<p><i>While it is understandable that the focus of the Draft is on corridors linking the developed areas of the County, the committee believes that rustic roads deserve mention in the Draft as they provide access to and links between the rural areas of the County, most notably the Agricultural Reserve.</i></p>	Robert J. Tworkowski, Chair Rustic Roads Advisory Committee	As a broad policy document, Thrive Montgomery 2050 doesn't call out specific roads or road classifications. All issues related to rustic roads will be addressed in the update to the Rustic Roads Functional Master Plan currently underway.

Design, Arts and Culture (Revised Theme #5: Design, arts and culture: adding value and building community)

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	<i>Need a final round of editing.</i>	<i>In general, while we respect that these introductory sections were written through a highly collaborative process and reflect many voices, we feel a final round of editing might result in a more cohesive statement.</i>	Todd Bressi for Arts and Humanities Council	Based on feedback from both the Planning Board and the public, the draft Plan will be significantly reorganized. These comments will be considered to inform revisions and reorganization of the draft Plan.
2.	Suggested edits to the text.	<i>Issues and Challenges--This is a series of ideas that might better be bullet points, if that style is allowable here.</i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
3.	Need for local design guideline panels.	Planning Director Wright in her speeches seems to rely quite a bit on "great design." However, our county doesn't have a form based zoning code or any other mechanism that requires a builder to build anything other than to the envelope (height, setback, FAR) defined. Establish local design guideline panels (implemented through master and sector plans, not the general plan) that have more teeth than the Bethesda model has, or we won't get "great design."	Jean Cavanaugh, Silver Spring	Planning staff believes that "great design" can be achieved through better public engagement, strong design guidelines, appointment of review panels in some areas and the introduction of form-based recommendations in our master and sector plans.
4.	Update the Locational Atlas of Historic Resources	<i>The draft Plan currently requires a program to periodically catalog "building types in the county with a high risk of obsolescence," but it does not currently include a requirement for a systematic review and updated survey of the County's historic, and potentially historic, resources. ADSW believes it is absolutely critical for</i>	Deborah Chalfie, Board member Art Deco Society of Washington	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>the Planning Board to add an Action Step under Goal 8 that would require more regular and systemic maintenance of the Atlas by the Historic Preservation staff to avoid a piecemeal approach and help prevent regrettable oversights until it is too late. Adequate funds need to be appropriated and allocated to enable them to document and inventory the list of historic resources for the Locational Atlas and Index. The Atlas must include midcentury buildings that are now of such as age as to be considered historic.</i>		
5.	Public spaces as gathering spaces,	We need to rethink public spaces to make them gathering spaces, which can be done by neighborhoods doing their own placemaking events.	Sebastian Smoot, Burtonsville	Staff concurs. Public spaces should be focused, well defined, and central within communities with primary uses focused toward people. These spaces should also be flexible to allow for various neighborhood gatherings, uses and programs as well as neighborhood placemaking events.
6.	Make art and culture part of the regulatory review.	<i>As with green space, recreation, and commerce, art and culture (i.e.: performances) should be interwoven into everything. Consider it as a lens for development approval: is the development within range of a venue? Does it have opportunities for local artists to put their stamp on it? Does it leave room for purely aesthetic and recreational engagement?</i>	Edmund Morris	Planning staff agree that there is a significant relationship between culture, arts, and the programming of space and their nexus with commerce and the economy.

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7.	Whether in urban, suburban or rural settings, the density and scale of compact development can vary to reflect the desired community character. (P. 33)	<p><i>it is interesting to see the guidance for rural communities and to reflect on what it means for Ashton's rural village center. The plan espouses the compact form of development. The SSARPC certainly doesn't want sprawl in Ashton, but we would like the Planning Board and the County Council to heed what is written on page 33 of the public hearing draft: "Whether in urban, suburban or rural settings, the density and scale of compact development can vary to reflect the desired community character."</i></p> <p><i>We believe that the design guidelines and maximum height and density proposed in the Ashton Village Center Sector Plan could reflect such a character. However, what the land owner and developer of the southeast quadrant requests will not look or feel rural.</i></p>	Amy Medd for Sandy Spring Ashton Rural Preservation Consortium (SSARPC) for Sandy Spring Ashton Rural Preservation Consortium (SSARPC)	Comment noted. The scale, intensity and types of uses should vary from a neighborhood center to its outer edges and individual developments should recognize this gradation. The questions of compatibility and local character are better addressed at the local master plan level.
8.	<p>9. 8.1: Use design to shape Montgomery County as a collection of world class towns, cities and rural villages with neighborhoods that celebrate their history, geography, and culture.</p> <p>10. Action 8.1.1.a: Create a countywide urban design vision and guidelines for growth using a rural-to-urban transect.</p> <p>11.</p> <p>12.</p> <p>13.</p>	<p><i>Our question to you and your staff is where is the rural end of the transect? The kind of suburban development that has been happening in Sandy Spring at Thomas Village and Porter Road in Ashton do not fit a rural definition of design. Is the whole county going to become one monolithic townhouse development after another?</i></p>	Amy Medd for Sandy Spring Ashton Rural Preservation Consortium (SSARPC)	The draft Plan proposes a variety development typologies of different densities and scales across the county. The goal is to allow for new development in suitable locations, while acknowledging the unique history, culture, and geography of communities in different parts of the county. The worksessions on compact growth and complete communities will have further discussion about typologies.

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14.	<p>Goal 8.1: Use design to shape Montgomery County as a collection of world-class towns, cities and rural villages, with neighborhoods that celebrate their history, geography, and culture.</p> <p>Goal 8.5: Sustain an arts and culture ecosystem that enriches the lives of county residents and the vitality of its communities, supporting <i>Thrive Montgomery 2050's</i> strategic goals for economic health, community equity, and environmental resilience.</p>	<p><i>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.</i></p>	Dan Wilhelm for Greater Colesville Civic Association	Thrive Montgomery is a long-term policy document that sets goals for shared future outcomes. Land development regulation is one tool among many that may be used to implement goals. However, the county will continue explore various implementation strategies, including strengthening multi-stakeholder partnerships to develop the necessary tools to achieve and sustain a lively art and culture ecosystem.
15.	Suggest adding a new policy.	<p><i>Add a new policy:</i> <i>Policy 8.1.2: Use public art tools to strengthen the involvement of artists in planning and design of county facilities and private development, and to recognize the diverse cultures of communities throughout the county.</i></p>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
16.	Goal 8.2: Create and preserve great places with attractive streets and public spaces, inspired urban design, and high-quality architecture that delivers lasting beauty.	<p><i>Goal 8.2. This largely deals with parks and that entire subject needs to be part of the Healthy and Sustainable Environment element.</i></p>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
17.	Policy 8.2.1: Ensure high quality design for all public and private architecture, infrastructure, and open space projects using design guidelines, design advisory	<p><i>Should "Use design competitions for major new civic facilities to create the highest-quality public structures that are a source of civic pride." be an action?</i></p>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.

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	panels, and other tools. Make design excellence a priority, even when cost saving measures are considered. Use design competitions for major new civic facilities to create the highest-quality public structures that are a source of civic pride.			
18.	Collaboration with the Public Art Trust.	<i>Add a new action: Action 8.2.1.c: Collaborate with the Public Art Trust to improve coordination for public art in county construction and to develop standardized public art interventions for basic infrastructure elements.</i>	Todd Bressi for Arts and Humanities Council	Staff believes this comment is encapsulated sufficiently by Policy 8.5.6, especially the following Actions: Action 8.5.6.a: Update the county’s public art ordinance to allocate 0.5% of the county capital budget to the Public Art Trust. Action 8.5.6.b: Develop a policy, in collaboration with arts advocacy partners, for allocating funds from the Public Art Trust into county construction projects, such as buildings, parks, and transportation infrastructure.
19.	Policy 8.2.1. Make design excellence a priority, even when cost saving measures are considered. (P. 117)	<i>We strongly disagree with this prioritization of values. Affordability and sustainability should be prioritized before subjective design considerations.</i>	Jane Lyons for Coalition for Smarter Growth	The intent is to strive for design excellence even if the project budget is tight. Elements such as orientation of building, relationship to site or building context or the overall public realm of sidewalks or open spaces, parking location, passive or active sustainability features, landscape and building materials should all be considered no matter the budget. An affordable project should never be

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				poorly designed. In addition, these considerations will make all projects more sustainable in the long run.
20.	Suggested edits to Policy 8.2.5.	Modify the text as follows: <i>Policy 8.2.5: Use public art and placemaking activities tools 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. support the cultural and social practices of the people will use them, provide for equitable access and use, and generates respect for diversity while building community.</i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
21.	Add a new action.	Add a new action: <i>Action 8.2.6.b: Expand access to professional resources in anthropology, ethnography, public history and related fields to support community placemaking projects.</i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
22.	Goal 8.3: Use design as a tool to avoid and mitigate the negative effects of climate change.	<i>Goal 8.3. This goal talks about the environment and it needs to be part of Healthy and Sustainable Environment element.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. The layout of the draft Plan is intended to reflect the overlap among different topics and how recommendations in one chapter achieve the Plan’s goals in another chapter.
23.	Most all buildings and projects should be net-zero by 2027.	<i>In 8.3.3 a. Add “most all buildings and projects should be net-zero by 2027, consistent with the county goal of an 80% reduction in GHG emissions by that year.”</i>	Herb Simmens	Staff agrees with the goal of creating net-zero buildings. However, as a 30-year policy document, Thrive Montgomery is not designed to

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				establish specific numeric goals or deadlines. The proposed edits are more appropriate to be included in the county's Climate Action Plan.
24.	Regarding Action 8.3.3.c.	<i>Consider expanding the street tree-planting program to include all infrastructure improvements, not just bicycle and pedestrian facility improvements.</i>	MDOT	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
25.	Action 8.4.1. Partner with DPS and other county agencies to update the County Code to fast track and create incentives for projects that adaptively reuse at least 50% of an existing structure or preserve at least 50% of all existing building materials on site. (P. 120).	<i>Mitigation and offsets are also welcome. However, also within this same action step is permission to "fast track" projects that may demolish up to 50% of an existing structure or building materials, and the floor of protection is incentivized, but not required. ADSW is concerned that the 50% standard could lead to façadism and mismatched hybrids that technically meet the standard but violate the integrity of the original building and satisfy no one. We urge the Planning Board to strengthen the adaptive reuse action steps to reference the importance of taking a holistic view of projects, and to require the preservation standard to be higher when a lesser standard would undermine the integrity of the original building or the end product as a whole.</i>	Deborah Chalfie, Boardmember Art Deco Society of Washington	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
26.	Goal 8.4: Make buildings in the county more resilient to disruption through flexible design and high adaptive reuse potential.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. Design is a product of both the public and private sector actions and influences. There is always a need for public sector guidance and input to make sure

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	Goal 8.6: Ensure all communities benefit equitably from good design, regardless of their location or demographics.			future development in the county is environmentally resilient, adaptable and designed to serve communities equitably.
27.	Suggested edits to Action 8.5.1.c.	<i>Added text highlighted in red: Action 8.5.1.c: Create a new Public Art Trust Master Plan that guides the provision of public art and better aligns it with planning processes, development review, capital project budgeting, and county services and Thrive Montgomery 2050 policies regarding the design of county facilities. The plan should also examine the applicability of an expansive view of public art practice — including civic practice, social practice and creative placemaking — and consider the management of the county’s expansive legacy public art collection.</i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
28.	Delete the Design chapter.	<i>This element needs to be deleted since after the above changes, there is nothing remaining.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff disagrees. Design, arts and culture are critical components of an economically competitive and equitable county that is a great place to live. Staff thinks the topics should be retained as a separate chapter.
29.	Action 8.5.6.c. Amend the Zoning Ordinance to make public art a prerequisite of receiving incentive density within the Commercial/Residential and Employment Zones.”	Density, given its core importance in achieving the county’s vision of future growth, should not be held as a bargaining chip for public art.	Jane Lyons for Coalition for Smarter Growth	Staff believes the larger and denser the development, the more responsible it should be to deliver public benefit, including public art, to the surrounding community it will serve.

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30.	Action 8.5.2.c	Add the <u>underlined</u> text: <i>Action 8.5.2.c: Develop strategies, in collaboration with arts advocacy partners, for building arts capacity as a component of <u>economic development, housing, social service and other community-based organizations.</u></i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
31.	Action 8.5.4.a	Proposed edits: Addition in underlined and deletions in strike through text: <i>Action 8.5.4.a: Create an “arts space bank” of underused spaces and <u>a non-profit entity that will facilitate the use of these spaces by artists and</u> allow arts and culture organizations to manage them via an arts and culture non-profit. The “arts space bank” could include new or existing county facilities (such as community centers, libraries, and schools) and <u>as well as</u> underused commercial (office, retail) and institutional buildings.</i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
32.	Policy 8.5.5	Proposed edits: Addition in underlined text. <i>Policy 8.5.5: Include recommendations promoting public art, cultural spaces, and cultural hubs in all future sector plans <u>and, when applicable, functional plans.</u></i>	Todd Bressi for Arts and Humanities Council	These comments will be considered to inform revisions and reorganization of the draft Plan.
33.	Action 8.5.6.b.	Proposed edits: Addition in underlined text. <i>Action 8.5.6.b: Develop a policy, in collaboration with arts advocacy partners, for allocating funds from the Public Art Trust into county construction projects, such as buildings, parks, transportation</i>	Todd Bressi for Arts and Humanities Council	Staff concurs.

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		<i>infrastructure, <u>public schools and Montgomery College</u>.</i>		
34.	Policy 8.5.8: Implement recommendations of the county’s Public Art Roadmap in partnership with arts advocacy organizations.	<i>Should this be an action, under Policy 8.5.6?</i>	Todd Bressi for Arts and Humanities Council	Actions are one-time events while policies are ongoing guidance for planning and other actions to achieve the Plan’s goals. Thus, implementation of the county’s Public Art Roadmap would be a continuous and repeatable event and is, therefore, considered a Policy.

Healthy and Sustainable Environment (Revised to be part of Parks and Recreation, Compact Growth, and Complete Communities chapters)

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	Need to address the full range of environmental concerns.	<i>With regard to the environment, the plan needs to address the full range of environmental concerns—not just climate change—including the environmental impacts of density, even compact density. In particular, there needs to be a more thorough recognition of the need to replace old infrastructure, including stormwater management, sewer, water, roads, bridges and culverts, as well as the infrastructure requirements for the compact, dense housing.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The draft Plan’s recommendations include Goals, Policies and Actions that address climate change, air quality and water quality, habitat preservation and restoration, environmental justice issues, human health, noise, and light pollution. Policies 6.2.3 and 6.2.4 particularly address the need to plan for upgrading our critical infrastructure, including water, sewer, stormwater, electrical, and communications systems to deal with climate change. Action 6.2.4.a recommends developing performance standards for utility infrastructure. These recommendations assume including the effects of compact density recommended by the draft Plan.
2.	Tree canopy and building retention	<i>[T]here must be a much greater emphasis throughout the plan on restoring the tree canopy. There also must be a recognition of the environmental toll of tearing down existing buildings (often mis-labelled “beyond their useful life”) to build new buildings.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The draft Plan includes not only recommendations to restore tree canopy, but to expand it. Goal 6.5 establishes this very broadly, and Policy 6.5.2 specifically recommends that the County “Protect, enhance, and increase the coverage, connectivity, and health of natural habitats such as forests (and) non-forest tree canopy...” Restoration of tree canopy is also implied in other recommendations, such as Action

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				6.1.1.a (Develop urban environmental guidelines to incorporate green features), Policy 6.2.1 (Use building and site design and other development features to address effects of heat, flooding, and extreme weather events), Policy 6.2.2 (Meet County GHG reduction goals through ...vegetative and other landscaping treatments), and others. There are also recommendations to prioritize adaptive reuse of existing structures (Goal 8.4, Policy 8.4.1, and Action 8.4.1.a).
3.	Support the Plan's environment related goals and policies.	<p><i>Planning [MDP] is pleased to see the county's proposed goals and policies that emphasize climate change...</i></p> <p><i>The goals, policies, and actions in the Healthy and Sustainable chapter of the Draft Plan aligns with the sensitive area element of the LUA.</i></p> <p><i>Most importantly, the Draft Plan includes in the Diverse and Adaptable Growth chapter the connection to the land use policies, programs and regulations that allow for flexibility to address unanticipated issues surrounding sensitive environmental features including climate change relationships in the following policy: [Policy 7.3.1]</i></p>	MDP	Comment noted.
4.	Need to update the Water Resources Plan.	<i>The Water Resources Plan (WRP) functional plan examines Montgomery County's land</i>	MDP	Staff has reviewed the County's Water Resources Functional Plan

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		<i>use, growth, and stormwater management in the context of adequate drinking water supplies, wastewater treatment capacity, water quality regulatory requirements, and inter-jurisdictional commitments. Planning [MDP] recommends that an action item be added to the Draft Plan to analyze the county's existing and proposed land use mapping in relation to the current WRP to determine whether any changes are needed to ensure conformance with or support of the Draft Plan, and if so, to include a proposal to update and revise the WRP in the appropriate time frame.</i>		(WRP) and has determined that the County's current and proposed land use do not differ significantly from the assumptions made in developing the Water Resources Functional Plan. As a result, no changes to the WRP are needed to ensure conformance with and support of the Draft Plan.
5.	Need more information to evaluate water and sewer needs.	<i>[T]he Draft Plan, as now constituted, does not provide the required level of land use and growth policy detail for Planning to evaluate water and sewer plans or amendments for consistency. A jurisdiction's water and sewer infrastructure is one of the most effective tools to facilitate and/or restrict growth; therefore, Planning [MDP] recommends including in the Draft Plan explicit references to the county's master plans for the intended implementation of water and sewer service policy and to provide clarity on how plan consistency should be evaluated in future master plans or water/sewer plan amendment proposals.</i>	MDP	Comment noted. The draft Plan's proposed land use and projected growth do not differ significantly from the assumptions made in developing the current water and sewer plans. As a result, no changes to the water and sewer plans are needed to ensure conformance with and support of the draft Plan at this time.
6.	Coordination with the county's Climate Action Plan.	<i>We would like to see more integration with the county's upcoming Climate Action and Resilience Plan; more about creating capacity in the electric grid and green</i>	Jane Lyons for Coalition for Smarter Growth, Berk	Planning staff and staff from the Montgomery County Department of Environmental Protection are working together to make sure that

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		<i>buildings; strategies to attack food deserts; siting renewable energy with parking lots, and commercial and industrial rooftops preferred; and planting more street trees to build the urban canopy.</i>	Ehrmantraut, Silver Spring	the recommendations of each plan are coordinated to achieve the County's climate change goals, including recommendations to accomplish many of the things suggested.
7.	Coordination with the county's Climate Action Plan.	<i>Our chief recommendation is that future efforts in the Thrive 2050 planning process be closely coordinated with the pending draft Montgomery County Climate Action and Resilience Plan (CARP). In order to fully address the climate emergency that the Montgomery County Council recognized in December 2017 with Resolution 18-974, the Thrive Plan needs to incorporate the climate targets and goals of the CARP into its vision, high level goals and proposed actions. This integration will likely cut across the various sections of the Thrive Plan and will not fit only under the "Healthy and Sustainable Environment" section of the document.</i>	Takoma Park Mobilization Environment Committee	Planning staff and staff from the Montgomery County Department of Environmental Protection are working together to make sure that the recommendations of each plan are coordinated to achieve the County's climate change goals. The Planning Board Draft will consider climate change in each section.
8.	Coordination with the county's Climate Action Plan.	<i>Let Thrive 2050 be informed by the work of the County's concurrently developing climate action plan. No net loss—of forest cover, of Agricultural Reserve acreage. Net gain only—in non-impervious cover; stormwater-treated acres.</i>	Laura Mol	Planning staff and staff from the Montgomery County Department of Environmental Protection are working together to make sure that the recommendations of each plan are coordinated to achieve the county's climate change goals.

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9.	Agree with the draft Plan's emphasis on climate change.	<i>The League agrees with the County that climate change is the most important environmental factor facing us between now and 2050 and that 100% clean energy is a correlating goal that should help decrease the level of greenhouse gases.</i>	League of Women Voters of Montgomery County	Staff concurs.
10.	Increase our natural resources.	<i>Environmental resilience: we need to increase our natural resources. It is not enough to preserve them. This means making natural resources part of everyday life and part of every development project.</i>	Edmund Morris	Staff concurs: Goal 6.5 states that we should "Preserve, restore, enhance, expand, and sustainably manage natural and other green areas to support human life and a diversity of animal and plant life." Policy 6.5.2 reiterates and clarifies that we must "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." This concept is reinforced by a recommendation included in Policy 1.1.2, which states that the County should "Integrate the natural and built systems that are necessary to achieve Complete Communities; and Policy 4.9.4, which recommends that we should "Design streetscapes to mitigate disruption from climate change, manage stormwater effectively, and provide tree canopy for shade and habitat."
11.	Need for more than just basic sustainability.	<i>[D]o not settle for being simply sustainable; strive to be regenerative and exemplary.</i>	Edmund Morris	Staff concurs. Please see: Policy 8.3.3, which recommends making biophilic

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		<i>Biophilic design, urban agriculture, underground and over-street spaces, low-maintenance streetscapes (e.g.: stop planting annuals for decoration), and scaffolded opportunities for community agri- and horticulture should be built into every conceivable space that is built from here on out. By 2050, we want a County that is literally green and vibrant, teeming with people and naturally-enhanced environments.</i>		design “a priority for design of structures, blocks and neighborhoods;” Action 8.3.3.c, which recommends creating an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels; Policy 6.3.1, which recommends planning “in three dimensions” to provide sustainability benefits from “below ground to rooftops” and spaces in between; and Policy 7.5.1 and supporting actions that recommend the development of urban agriculture programs.
12.	Study two more economic scenarios.	Thrive Montgomery 2050 appears to have been developed under the assumption that we have an almost endless supply of fossil fuel and other natural resources on the planet for our use. Review and incorporate the systems modeling, projection, and recommendations from the experts and revise the Plan over the next years by adding at least two more scenarios: one where the current economy and lifestyle remains how it is currently, and one where our economy declines at 6-8% per year and our lifestyles and policy options become severely constrained. Include a more explicit accounting for the effects of climate change. (Numerous studies and resources cited).	Cedar Lane Ecosystems Study Group, Patty McGrath, Nanci Wilkinson, Cedar Lane Ecosystem Study Group	Staff disagrees that the draft Plan assumes an unlimited supply of fossil fuels. Everything proposed in the draft Plan could be achieved using 100% renewably generated electricity. To address climate change in an already-developed and built-out county, the draft Plan proposes to accommodate the projected population growth in a way that still-undeveloped places can remain undeveloped, preserving forest canopy, water quality, and natural ecosystems. It also allows existing infrastructure to continue to be used and improved, rather than sinking more materials into entirely new infrastructure. The purpose of a

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				<p>General Plan is to create a singular vision for the future of the county with the acknowledgement of future uncertainties. If the County experiences consistent economic decline, some policies and actions may not be possible, or will be revised, but the goals and guiding principles will remain.</p> <p>Staff has analyzed two scenarios to assess the impacts of varying economic and travel conditions on the county's future transportation network. See https://montgomeryplanningboard.org/wp-content/uploads/2021/01/item3_1_Attachment-2-Transportation-Analysis-Report-Part-1.pdf and https://montgomeryplanningboard.org/wp-content/uploads/2021/01/item3_1_Attachment-2-Transportation-Analysis-Report-Part-2.pdf.</p>
13.	Food deserts	I would like to see a greater emphasis on tackling food deserts.	Jessica Bronson, Berk Ehrmantraut	These comments will be considered to inform revisions and reorganization of the draft plan.
14.	Support for retaining existing farmland.	<i>We are also in favor of supporting and sustaining existing farmland whenever possible in the County. Recent COVID-19 pandemic experience has shown that the industrial supply chain may not always cover periods of high demand. Therefore,</i>	Josh Silverstein, President, Randolph Civic Association	Staff concurs.

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		<i>local foods and produce are not only healthy and flavorful, but also essential in times of peak demand.</i>		
15.	Interrelatedness of various elements of land use planning.	<i>Emphasizing the interrelatedness of the elements of land use planning, Planning finds it refreshing that the Draft Plan provides for a discussion of the climate change within the Safe and Efficient Travel chapter. For example, “We simply cannot be equitable, address climate change, and support a strong economy by building more roads.” (p. 72) The Draft Plan acknowledges that transit and walkability are key to addressing climate change – building more roads must be avoided.</i>	MDP	Comment noted. Staff recognizes that all elements of our land use are intertwined with issues such as Environmental Resilience, Equity, and a robust Economy. The draft Plan intentionally incorporated recommendations addressing these issues in all chapters.
16.	Include a mineral resources element.	<i>The mineral resources element has not been addressed. Planning [MDP] recommends that the county provide information on current active mining or other geological resources if the information is available or add a proposal to do so in the future within the Implementation chapter.</i>	MDP	Comment noted. Staff will include a mineral resources element in the draft Plan to comply with State law.
17.	Protections for the environment and against sprawl.	<i>The proposed new plan is packed full of goodness. What it misses and its inability to contain the trajectory of future development is alarming. Most importantly it contains less protections for vital resources and communities than the 1993 Refinements... the proposed new plan has less overarching protections for the environment and against sprawl than the plan it intends to replace.</i>	Scott Plumer for Darnestown Civic Association	The goals and policies in the Plan aim to accommodate new development and redevelopment in a manner that enhances the environment. It also explicitly calls out the need to replace the county’s sprawl pattern of greenfield development with compact, infill development. The Draft Plan includes broad goals and policies that will lead to specific actions to address: Climate change

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				and all of its impacts; the protection, preservation, expansion, connection, and stewardship of the county's natural resources, including forests, wetlands, tree canopy, water resources, and biological diversity; Environmental Justice; farmland and the Agricultural Reserve; and all environmental issues that negatively affect physical, mental and emotional health and well-being.
18.	Expansion of local food production efforts and a sustainable, nutritious local food supply.	<p><i>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.</i></p> <p><i>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</i></p>	Catherine Nardi and Heather Bruskin for MC Food Council	Staff concurs.

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		<i>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.</i>		
19.	Tree Canopy Preservation	<i>I would like to see more emphasis on preserving and growing the county's tree canopy especially in urban and areas that are planned for densification. The literature I have read on 15-minute living applies to real cities, but regardless, all point to necessity of having community spaces, significant natural spaces, and trees for all the reasons we have all discussed ad nauseam over the years (environmental, health, agriculture/bees, reduce crime, manage stormwater, etc). Reduce lot coverage allowances in order to preserving and grow the tree canopy especially in denuded business districts and close in suburbs.</i>	Jean Cavanaugh, Silver Spring, Rachel Taylor, Clarksburg	Recommendations in the Transportation section include Policy 4.2.2 and Action 4.2.2.a, Policy 4.2.3, and Policy 4.9.3. These policies and actions recommend repurposing lanes and reallocating street space to create more room for non-auto transportation facilities and soil panels for street trees and providing tree canopy for shade and habitat. In the Healthy and Sustainable Environment section, Action 6.1.1.a recommends developing urban environmental guidelines to incorporate green features (such as trees) into urban areas for their numerous environmental and health benefits; Policy 6.2.2, which recommends using vegetative and other landscaping treatments to help the County achieve its GHG reduction goals and address climate change impacts; Policy 6.5.2 and Action

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				6.5.2.a, which recommend both protecting and expanding existing forests and non-forest tree canopy and establishing canopy goals and strategies; Actions 6.5.2.c and 6.5.2.d and Policy 6.5.5, which recommend developing guidelines for forest and tree management plans, including planting native species and controlling invasive species; and Policy 6.5.6, which recommend the use of green streets and increased tree canopy to help manage stormwater and improve stream water quality. The Arts, Design and Culture section includes Action 8.3.3.c, which recommends creation of an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels and a countywide policy for no net loss of tree canopy.
20.	Role of the Parks system.	<i>The role of the Montgomery Parks system must be further highlighted, including the role of Park forests and other Park natural areas in the health and well-being of County residents.</i>	TAME Coalition.	These comments will be considered to inform revisions and reorganization of the draft plan.
21.	Coordination with the county's Climate Action Plan.	<i>TPMEC supports Montgomery Planning's commitment to compact urban development. Adopt a strong goal to reduce the additional impacts of compact urban development, e.g., stormwater management.</i>	Nathalie Peter for Takoma Park Mobilization Environment Committee	The draft Plan includes many of the ideas that you are promoting. They are expressed at a high level, so that detailed work products that more comprehensively address these points can be prepared to implement the recommendations. Included in

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		<p><i>Our chief recommendation is that future efforts in the Thrive 2050 planning process be closely coordinated with the pending draft Montgomery County Climate Action and Resilience Plan (CARP). Promote climate friendly policies, goals and actions. Adopt a county net POSITIVE forest policy goal that includes actions to protect and increase, both native forest cover and overall tree canopy. Adopt a strong goal to reduce the additional impacts of compact urban development, e.g., stormwater management. Plan for higher and more variable water tables. Adopt a stronger building GHG reduction policy goal, Provide guidance on siting renewable energy projects. Promote adaptable infrastructure that mitigates the negative impacts of climate change. Plan for and support alternative modes of transportation that significantly reduce and ultimately eliminate transportation related emissions.</i></p>		<p>the Draft Plan are recommendations to improve stormwater management, recommendations to expand forest cover and non-forest tree canopy, a recommendation to evaluate and respond to changing floodplain boundaries and identify areas vulnerable to localized flooding, recommendations to upgrade all infrastructure, including stormwater management treatment and conveyance systems and transportation systems to adapt to climate change impacts, recommendations to transition away from fossil fuel powered, single-occupant vehicles to clean transportation and transit alternatives, and recommendations to coordinate with the County on implementation of the Climate Action Plan.</p>
22.	Greater environmental protection and sustainability.	<p><i>We need an even stronger commitment to maintain our remaining ecosystem services of forests, streams and wetlands, and to stop the expansion of impervious surface, even reversing it in an intentional way. Existing forests and forest patches should not only be protected and conserved, but they should be expanded. New and existing native habitat should be promoted on private property as well as public areas, not only adjacent to streams</i></p>	Galen Tromble, Silver Spring	<p>Recommendations in the Transportation section include Policy 4.2.2 and Action 4.2.2.a, Policy 4.2.3, and Policy 4.9.3. These policies and actions recommend repurposing lanes and reallocating street space to create more room for non-auto transportation facilities and soil panels for street trees, and providing tree canopy for shade and habitat. In the Healthy and Sustainable Environment section, Action 6.1.1.a</p>

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		<p><i>but in broad corridors across the county – including down-county.</i></p> <p><i>Building social connections within neighborhoods is an extremely important goal but doing so should be done without fragmentation of natural areas.</i></p> <p><i>The plan should emphasize the importance of prioritizing native habitat as land cover.</i></p> <p><i>The plan should expressly recognize that tree canopy and cover over the built environment do not approximate forests or native plant communities at all.</i></p> <p><i>It should be a County priority to ensure that greenways, protected areas, and conservation easements are healthy ecological systems and not overrun by invasive species that can destroy ecosystem function or unnecessarily fragmented.</i></p>		<p>recommends developing urban environmental guidelines to incorporate green features (such as trees) into urban areas for their numerous environmental and health benefits; Policy 6.2.2, which recommends using vegetative and other landscaping treatments to help the County achieve its GHG reduction goals and address climate change impacts; Policy 6.5.2 and Action 6.5.2.a, which recommend both protecting and expanding existing forests and non-forest tree canopy and establishing canopy goals and strategies; Actions 6.5.2.c and 6.5.2.d and Policy 6.5.5, which recommend developing guidelines for forest and tree management plans, including planting native species and controlling invasive species; and Policy 6.5.6, which recommend the use of green streets and increased tree canopy to help manage stormwater and improve stream water quality. The Arts, Design and Culture section includes Action 8.3.3.c, which recommends creation of an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels and a countywide policy for no net loss of tree canopy. These recommendations call out forest and non-forest tree</p>

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				canopy separately in recognition of their important differences. Non-forest tree canopy should be established and maintained where creating and maintaining forest is not possible.
23.	Greater emphasis on climate change.	Climate change must be conveyed as an emergency. The plan needs stronger language and actions regarding climate change.	Herb Simmens, Climate Mobilization Montgomery County Chapter, Jessica Bronson, Lauren Brown, Conservation Montgomery	These comments will be considered to inform revisions and reorganization of the draft plan. In addition, staff from the Planning Department and the County Department of Environmental Protection are working together to make sure that the recommendations of each plan are coordinated to achieve the County's climate change goals.
24.	Coordination with the county's Climate Action Plan.	Establish a climate workgroup to ensure that this plan aligns with the upcoming Climate Action and Resilience Plan (CARP). Convene a public meeting that focuses on the connections between Thrive and CARP. Delay the deadline for comments until after the CARP is released so people have time to review it.	Herb Simmens, Climate Mobilization Montgomery County Chapter, Walter Weiss, Nanci Wilkinson, Cedar Lane Ecosystem Study Group, David Blockstein, Clean Energy Working Group, Takoma Park	Planning staff and staff from the Montgomery County Department of Environmental Protection are working together to make sure that the recommendations of each plan are coordinated to achieve the County's climate change goals.

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25.	The county's greenhouse gas reduction goals.	The plan should explicitly include county's stated goal of reducing greenhouse gases, 80% by 2027 and 100% by 2035.	Herb Simmens, Climate Mobilization Montgomery County Chapter, Walter Weiss, Montgomery County Faith Alliance for Climate Solutions	The draft Plan includes the following statement on page 97: "In 2017, Montgomery County was the first suburban jurisdiction to pass a resolution declaring a Climate Emergency and committing the county to reducing greenhouse gas emissions to zero by 2035. In 2019, the county began working on a Climate Action and Resilience Plan. In tandem with that plan, Thrive Montgomery 2050 aims to help support the implementation of related goals and policies in the General Plan."
26.	Complete Communities to address climate change.	I welcome Complete Communities that the plan describes; I live near Flower Hill Development and I would love to see more of the county implement the same. We must change our housing types and expand access to transit if we want to meet climate goals. Climate change poses threats of financial, physical, and mental hardships, and close knit, green, walkable communities will help cope with them.	Steven Kraft, Gaithersburg	Staff concurs.
27.	Greater accessibility of the forested areas of Paint Branch and Northwest Branch Parks.	<i>The other area where our community has been shortchanged pertains to the limited accessibility of the forested areas of the nearby Paint Branch and Northwest Branch Parks. While there have been many recommendations in Master Plans over the</i>	Barry Wides, President, North White Oak Civic Association	Staff concurs. Public and private open space should be connected and allow every resident access to natural spaces. The new Parks and Recreation chapter will expand the importance of trails even further.

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		<p><i>years for improved trails and connectors to our nearby parks, very few have ever been implemented. However, have watched major trail improvements be[ing] made throughout parts of the county that are west and northwest of White Oak.</i></p> <p><i>To this point, we are supportive of the report's recommendation that every community has a network of inclusive, safe, and accessible public parks, trails, and other recreational spaces that connect neighborhoods, increase opportunities for social interaction, encourage active lifestyles. We support the recommendation that the walking and transit accessibility of the existing network of parks and trails, nature centers, and cultural sites be studied to identify opportunities to improve accessibility to parks and trails for all residents.</i></p>		<p>Currently, Montgomery Parks is making a concerted effort to improve park accessibility including the construction of a new natural trail between Old Columbia Pike and MLK Jr. Rec. Park and a comprehensive natural surface trails network in Upper Paint Branch Stream Valley Park.</p>
28.	Climate change and COVID-19.	<p><i>Climate change is the smothering 800 lbs. elephant in the room. Not only does it have the potential to be a perennial "black swan", it also has the potential to spin off other potential "black swan" events, such as devastation to our watershed stormwater management and the encroachment we've seen on the endemic flora and fauna of our varied environmental landscape. COVID-19 can be seen to be related to a considerable Environmental encroachment and deterioration of undeveloped areas.</i></p>	M. Allen	Comment noted.

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29.	Need for more information on the suburban and rural context.	<i>Section 6 – Healthy and Sustainable Environment – Embracing urbanism is a worthy, sustainable goal, but where is the suburban and rural context referred to in Goal 1.1. Having a compact form of development with a variety of non-auto transportation modes does not fit the reality of existing development.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff believes that moving toward more efficient use of land and more sustainable transportation options are worthy goals to pursue. How to best apply this in different development contexts will be discussed in upcoming Planning Board worksessions, particularly in the Complete Communities discussion.
30.	Efficient use of resources and better, more equitable and sustainable waste management.	<i>This General Plan, like previous ones, reaches well beyond land use and lays out a broader vision for life in Montgomery County, including aspects like public art and cultural amenities. Yet, rethinking how businesses, institutions, and households use resources and manage wastes is necessary to achieve the goals outlined in the Thrive report. However, this topic is largely ignored in the Plan, with no details for how the County could realize the vision of economic health, equity, and environmental resilience. The report should explicitly recommend: All plans adopt zero-waste strategies at local community and countywide levels, including decentralized infrastructure and institutions for residents to reduce waste, reuse, repair, and recycle/compost - without reliance on a private vehicle.</i>	Solid Waste Advisory Committee (SWAC)	Staff concurs that reducing waste and moving toward a zero-waste society are important steps toward achieving sustainability. Much of the planning and implementation for reducing waste belongs with other County agencies, including many of the issues that relate to building codes and personal behavior. The draft Plan makes recommendations that have a connection with land use and development, including recommendations in the Design, Arts and Culture section for conversion and adaptive reuse of buildings, and a recommendation in the Diverse and Adaptable Growth section to “identify recommendations for flexibility in accommodating industries and services that support agriculture including food processing, distribution, sale, consumptions, and waste management” (Action 7.4.2.b).

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		<p><i>Our County aim to contain wastes produced here within the boundaries of our own county, to the greatest extent possible.</i></p> <p><i>As a matter of equity, we should not burden poor communities locally or abroad, nor can we use the atmosphere, waterways, or soils for waste management unless strictly and transparently regulated, with careful assessment of public health and local ecologic impacts.</i></p> <p><i>Reduction of materials use, whether through a shift away from disposability to durability, or simply buying less and buying better designed and less resource intensive goods, should be the primary strategy to minimize waste.</i></p>		<p>Overall, the draft Plan focuses on less wasteful, more efficient and sustainable use of the land itself.</p>
31.	Greater emphasis on natural resource protection.	<p><i>All of the goals, objectives and strategies outlined in the Environment section (pgs. 66-73) of the 1993 General Plan should be retained and strengthened in the Thrive update. The Thrive draft plan departs greatly from natural resource protection. Instead, the Thrive focus has become strongly anthropocentric in a time where an eco-centric approach is the most urgent need if our civilization is to survive through the end of this century.</i></p> <p>Suggestion to keep certain text from the February 2020 Issues Report on Healthy and Sustainable Environment, Environmental Concerns, Climate change,</p>	John Parrish	<p>The draft Plan reflects both two major new areas of environmental concern that directly affect people (health and environmental justice), and the perspective that links an eco-centric approach to the survival of human civilization. The new areas of focus are related to strong new research that associates preservation and inclusion of natural resources in human environments to better human health outcomes, and the need to make certain that equitable outcomes are ensured when considering both positive and negative environmental factors that</p>

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		<p>Water and sewer, and The Agricultural Reserve.</p> <p><i>The Healthy and Sustainable Environment section needs to strongly emphasize forest preservation, water quality, preservation of the Agricultural Zone, and sustaining native biodiversity.</i></p> <p><i>The Thrive plan needs to incorporate and strengthen language from the 1993 General Plan (Objective 8, pg. 72) calling for increasing and conserving the County's forests. The Plan should call for improvements to laws, master plans, and environmental guidelines to overcome any shortcomings of the 1993 plan.</i></p>		<p>affect human health and prosperity. The environmental recommendations in the draft Plan that focus on addressing climate change, health, environmental justice, and creating livable places require and justify preservation and incorporation of natural resources into our human environments. Staff will consider whether language focusing on preservation of biological diversity should be strengthened.</p>
32.	Greater emphasis on Forest preservation.	<p><i>The Thrive plan needs to incorporate and strengthen language from the 1993 General Plan (Objective 8, pg. 72) calling for increasing and conserving the County's forests. The Plan should call for improvements to laws, master plans, and environmental guidelines to overcome any shortcomings of the 1993 plan.</i></p>	John Parrish	<p>There are numerous recommendations in the draft Plan that call for increasing and conserving the County's forests and tree canopy, but this may not be as obvious as in past plans, because these recommendations are incorporated into several of the draft Plan chapters. For example: Recommendations in the Transportation section include Policy 4.2.2 and Action 4.2.2.a, Policy 4.2.3, and Policy 4.9.3. These policies and actions recommend repurposing lanes and reallocating street space to create more room for non-auto transportation facilities and soil panels for street trees, and providing tree canopy for shade and habitat. In</p>

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				<p>the Healthy and Sustainable Environment section, Action 6.1.1.a recommends developing urban environmental guidelines to incorporate green features (such as trees) into urban areas for their numerous environmental and health benefits; Policy 6.2.2, which recommends using vegetative and other landscaping treatments to help the County achieve its GHG reduction goals and address climate change impacts; Policy 6.5.2 and Action 6.5.2.a, which recommend both protecting and expanding existing forests and non-forest tree canopy and establishing canopy goals and strategies; Actions 6.5.2.c and 6.5.2.d and Policy 6.5.5, which recommend developing guidelines for forest and tree management plans, including planting native species and controlling invasive species; and Policy 6.5.6, which recommend the use of green streets and increased tree canopy to help manage stormwater and improve stream water quality. The Arts, Design and Culture section includes Action 8.3.3.c, which recommends creation of an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels and a</p>

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				countywide policy for no net loss of tree canopy.
33.	Stronger protections for streams and water quality.	<i>The Thrive plan needs to recognize the short comings of the previous General Plan and address the short comings by calling for stronger protections for streams and water quality if we and our streams are to really thrive.</i>	John Parrish	<p>Recommendations for the protection and improvement of water quality in the Public Hearing Draft Plan focus on several related issues: the need to adapt to changing climate conditions, including more frequent and often localized flooding events that increase erosion and sedimentation and change floodplain boundaries; the need to protect the watersheds that provide our potable water supplies; and the need to protect and restore streams that have been degraded, with consequent damage to the aquatic life they harbor.</p> <p>Recommendations that specifically address climate change impacts are under Goal 6.2, including Policy 6.2.1 and Action 6.2.1.b, as well as Policy 6.2.2, Policy 6.2.3, Policy 6.4, and Action 6.2.4.a. Recommendations specific to protecting watersheds and aquifers are included in Policy 6.5.6 and Action 6.5.6.a.</p> <p>Recommendations for protecting and enhancing stream water quality and aquatic habitats are included under Goal 6.5, and virtually all of the policies and actions under that goal, including policies and actions to preserve, increase, and enhance forest and tree canopy and to reduce</p>

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				impervious surfaces. These two factors – forest and tree cover and imperviousness – are keys to protecting stream water quality and habitats.
34.	Greater protection for the Agricultural Zone.	<i>The Agricultural Zone continues to be threatened by large lot developments, industrial solar and by the applications of toxic pesticides and herbicides to grow crops. The Thrive plan needs to encourage sustainable organic-based agriculture and promote better policies to prohibit land uses that undermine agriculture and public health. Industrial solar should not be permitted and harmful crop herbicides and pesticides should be banned.</i>	John Parrish	Sustainability goals, policies and actions related to the Ag Reserve were consolidated into the Diverse and Adaptable Growth chapter of the Public Hearing Draft Plan. Goal 7.4 and many of the policies and actions under it address the ideas this comment promotes. In particular Policies 7.1 and 7.2 focus on preserving agriculture as the primary land use in the Ag Reserve and that environmental and resilience benefits of the Reserve should be protected. Action 7.4.2.a recommends studying evolving sustainable agricultural practices and developing recommendations from the study to enhance the economic viability and environmental resilience capacity of the Reserve.
35.	Biodiversity.	<i>We are now living amid a sixth great extinction event where species are rapidly disappearing from our planet due to massive human caused habitat destruction. The Thrive plan needs to incorporate language calling for preservation and enhancement of native biodiversity, specifically the ecological systems that</i>	John Parrish	The draft Plan recognizes the critical importance of protecting and preserving biological diversity. Most of the recommendations for accomplishing this are contained under Goal 6.5, which reads, in part, “Preserve, restore, enhance, expand, and sustainably manage natural and other green areas to support human

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		<p><i>support our native plant and animal communities. Objective 6 (pg. 71) of the 1993 General Plan should be retained and strengthened in the updated plan.</i></p>		<p>life and a diversity of animal and plant life.” Because habitat degradation and habitat loss are still key contributors to the loss of biodiversity, Policy 6.5.2 directs that the County should “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,” and Action 6.5.2.a reads, “Conduct a study to identify forests and other natural areas with high value for climate mitigation, resilience, and biological diversity. Establish appropriate forest and non-forest canopy goals and strategies to protect plant and wildlife diversity and human health.” Other policies and actions recommend planting native species and controlling invasive species. And the focus on redevelopment and infill in already developed areas is an important strategy to control sprawl and save our most critical natural areas. We do note, however, that the term “diversity” as applies to biological diversity is barely mentioned, even if a number of actions are proposed to preserve biological diversity. Staff will look at strengthening the</p>

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				connections between recommendations and protection of biodiversity.
36.	Climate Change and the need for a paradigm shift.	<i>It is good that the Thrive plan acknowledges climate change as a significant threat to our human and natural communities. However, it does not offer a plan that has the ability to withstand the disruptions forecast by a consensus of the scientific community to occur within the 2050 timeframe. The Plan needs to shift to a radically different paradigm where humans are encouraged to live more simply, and with, a deeper respect to our limited precious natural resources.</i>	John Parrish	Staff concurs that dealing with climate change requires a paradigm shift. The draft Plan establishes a framework to make simpler living more attainable through land uses, transportation options, and the provision of parks and open spaces that enable people to meet more of their needs without traveling by car, having more options to get where they need to go by bike and on foot, and connect them to nature so that they can experience and develop an appreciation for it.
37.	Noise pollution.	<i>The Thrive plan should encourage ways to sharply reduce noise pollution. One good way is to ban or more strongly regulate noise emissions from leaf blowers and lawn mowing equipment. A strengthened noise ordinance that calls for a sharp reduction in decibel levels is needed for peace of mind and body.</i>	John Parrish	Noise is an important health issue, but noise is regulated by MCDPS. It is outside of the scope of a General Plan. The draft Plan's land-use related noise recommendations call for using master plans and the regulatory review process to locate land uses that generate excessive noise away from sensitive communities.
38.	Community gardens	<i>Thrive should promote the creation of more community gardens to accommodate the high demand and promote a healthier lifestyle. Expansion of the community garden program will also give people living in apartments and town homes an opportunity to grow fresh food.</i>	John Parrish	Recommendations to accomplish this are included in at least two places in Action 6.4.1.a recommends that we "Evaluate existing public and private open space and facilities and identify opportunities for the inclusion of community gardens and the

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				development of urban farms.” Goal 7.5, Policy 7.5.1, and the actions under that policy are all designed to increase local food production at different scales throughout the County.
39.	Include certain text from the February 2020 Issues Report.	Suggestion to keep certain text from the February 2020 Issues Report on Environmental Concerns, Climate change, Water and sewer, and The Agricultural Reserve.	Roberta (rg) Steinman	Comment noted. These comments will be considered to inform revisions and reorganization of the draft plan.
40.	Maintain the green Wedges.	<i>Maintain the Green Wedges. “The Wedge is as important today as it was 30 years ago. It permits the renewal of our air and water resources and the protection of natural habitats. It is very much the green lung of Montgomery County. ...The proximity of the Wedge to the Corridor provides a sanctuary for those who need a change from the concrete and glass of more urban settings.” (The 1993 General Plan Refinement, p.9).</i>	Roberta (rg) Steinman	Staff concurs. The importance and functions of the Wedge are recognized in the recommendations in the Draft Plan to preserve the Agricultural Reserve as a “model for supporting and protecting agriculture and rural open space that provides vital economic, environmental, and health benefits in a major metropolitan area,” as well as recommendations to preserve and protect the significant natural resource areas in the Ag. Reserve and elsewhere.
41.	Safe passages for wildlife.	<i>Create safe passages for Wildlife: The need for safe passage for wildlife between protected areas is critical to their migration and to ensuring the healthy genetic diversity of animal and plant populations to withstand the challenges of habitat fragmentation and climate change.</i>	Roberta (rg) Steinman	Goal 6.5, and particularly within Policy 6.5.2, include the word “connectivity” in recognition of the need to preserve, improve, and expand the creation and protection of wildlife corridors and reduce fragmentation.

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42.	Use of plastic synthetic turf.	<i>Prohibit use of plastic synthetic turf. The plastic turf contains toxic chemicals that pose a hazard to public health and the environment.</i>	Roberta (rg) Steinman	This level of operational detail is outside the scope of the draft Plan as a general policy document.
43.	Agricultural Reserve.	<i>Preserve the Agricultural Reserve. It is important that agricultural use be viewed as a valued and permanent land use. Agricultural land preservation in the Agricultural Wedge is not a holding use for future development.</i>	Roberta (rg) Steinman	The draft Plan recognizes the importance of preserving the Ag Reserve for agriculture as its primary use. Sustainability goals, policies and actions related to the Ag Reserve were consolidated into the Diverse and Adaptable Growth chapter of the draft Plan. Goal 7.4 and many of the policies and actions under it address these comment. In particular Policies 7.1 and 7.2 focus on preserving agriculture as the primary land use in the Ag Reserve and that environmental and resilience benefits of the Reserve should be protected. Action 7.4.2.a recommends studying evolving sustainable agricultural practices and developing recommendations from the study to enhance the economic viability and environmental resilience capacity of the Reserve.
44.	Imperviousness reduction.	<i>Implement County-wide impervious reduction and address run-off at its upstream sources.</i>	Roberta (rg) Steinman	The draft Plan establishes a framework for reducing imperviousness through the recommendations in Policy 6.5.1 and Action 6.5.1.a. More specific recommendations would be part of future work program plans/studies

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				developed to implement the Draft Plan recommendations.
45.	Preserve and restore forests.	<i>We are losing our high-quality interior forests in Montgomery County due to a number of factors, including fragmentation. We must take care of, and strive to restore, and over the longer horizon re-grow more interior forest, to begin to replace the interior forest we've lost and destroyed over the decades. Strengthen the longstanding MNCPPC-Montgomery Parks policy of protecting at least 2/3 of our regional parks, as Conservation land (per the Ten-Year PROS plan).</i>	Roberta (rg) Steinman	Applicable recommendations in the draft Plan include: Policy 6.2.2, which recommends using vegetative and other landscaping treatments to help the County achieve its GHG reduction goals and address climate change impacts; Policy 6.5.2 and Action 6.5.2.a, which recommend both protecting and expanding existing forests and non-forest tree canopy and establishing canopy goals and strategies; Actions 6.5.2.c and 6.5.2.d and Policy 6.5.5, which recommend developing guidelines for forest and tree management plans, including planting native species and controlling invasive species. The Arts, Design and Culture section includes Action 8.3.3.c, which recommends creation of an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels and a countywide policy for no net loss of tree canopy.
46.	Trends and Challenges: “12. Climate change threatens all aspects of life. We will need significant investments in upgrading our infrastructure to withstand the threats of extreme weather and other disruptions. These improvements will put	<i>WMCCA Comment: Upgrades to our infrastructure to handle weather conditions have been woefully inadequate for decades. Therefore, to only point the finger at climate change is highly disingenuous. Some of our stream valleys are highly degraded due to decades of inadequate stormwater control regulations - yes, this</i>	Kenneth Bawer for West Montgomery County Citizens Association	Stormwater regulatory requirements are outside the scope of Thrive Montgomery 2050, which as a General Plan is a high-level policy document. Any changes to the county’s stormwater controls and requirements would take place outside of the Thrive Montgomery

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	extra burden on the county's financial resources." (P. 24)	<i>will be made worse by climate change. We expect more intense storms caused by global warming. To lessen the burden on the County's financial resources, a Thrive 2050 goal should be to enact more stringent stormwater control requirements for new build homes and home renovations (i.e., much more than the current 1 inch or so of rain in 24 hours). For the huge number of existing homes, there should be a new regulation that properties must be retrofitted to control storm water to "new build standards" upon property transfer – who pays the cost could be negotiated between buyer and seller. For commercial property, stormwater control to "new build standards" should be required upon sale. Grandfathering for commercial property should not be allowed.</i>		2050 process and be informed by recommendations in the Climate Action Plan and relevant policy guidance in Thrive Montgomery 2050.
47.	"Montgomery County is a leader in protecting and enhancing the natural environment through a broad range of planning initiatives, policies, and regulations to protect sensitive environmental resources. But many indicators such as stream water quality, forest loss, loss of plant and animal species, and increased imperviousness point to greater stewardship challenges. As the population expands and the region continues to develop, pressures on our natural systems increase." (P. 97)	<i>WMCCA Comment: Change, "Montgomery County is a leader in protecting and enhancing the natural environment..." to "Montgomery County's vision is to become a leader in protecting and enhancing the natural environment..." There is no way we can claim to be a leader when, for example, we are trashing our natural areas by doing so-called "stream restorations" which convert natural (although not always pristine) areas into engineered stormwater conveyances (with some exceptions such as "daylighting" piped streams and concrete culvert removal). We are not a leader in protecting our natural environment when</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment. The draft Plan includes recommendations to protect aquifers and watersheds, especially to protect our water supplies.

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		<i>overdevelopment is degrading the water quality in Little Seneca Lake, our emergency drinking water supply.</i>		
48.	Protection of natural resources including plants and wildlife.	<i>Our vision for 2050 is a County in which the creation of wildlife and plant corridors has the same priority as development corridors. The need for safe passage for wildlife between protected areas is critical to ensuring the healthy genetic diversity of animal and plant populations to withstand the challenges of habitat fragmentation and climate change. Residents will be encouraged to replace traditional turf lawns with conservation landscaping using native plants to support native pollinators and birds and control stormwater runoff. County codes will be revised so that residents do not get citations from a Housing Code Inspector that they are violating Chapter 58 of the Montgomery County Code by permitting weeds and grass to grow in excess of 12 inches when, in fact, they have replaced their turf grass with an area of conservation landscaping.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The draft Plan includes recommendations to preserve, enhance, and expand the coverage, health, and connectivity of forests and other habitats. Connectivity was specifically included to address the need for creating, preserving, and connecting wildlife and plant corridors and heal fragmented habitats. There are also recommendations for planting native species. Some of the other comments are more appropriately addressed through Plan implementation and/or by the actions of other agencies.
49.	Vision for Healthy and Sustainable Environment (P. 97)	<i>WMCCA Comment: We need a goal and policy to require returnable bottles. The Northeast has done this for decades. We need to stand up to the retail stores who have pushed back on this forever.</i> <i>WMCCA Comment: We need a goal and policy that retailers can only sell products in packaging that can be recycled by the County.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These recommendations are too specific and operational for a policy-focused general plan, but should be considered by other government agencies for implementation under programs and policies that they administer.

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		<p><i>WMCCA Comment: We need conservation measures to be enacted to conserve water (for example, an “excessive use” charge which would a higher charge that kicks in when the “standard” per person daily usage is exceeded – to discourage lawn watering, for example).</i></p> <p><i>WMCCA Comment: We need a County-wide education program about the need to conserve water.</i></p> <p><i>WMCCA Comment: We need to change the code to allow grey-water systems and composting toilets.</i></p> <p><i>WMCCA Comment: We need to change how WSSC sewage overflows are reported and how the public is notified</i></p> <p><i>WMCCA Comment: The county must get serious and honest about reporting true air quality conditions to residents. Currently, Montgomery County's has a single air quality monitoring station in the middle of an open field near Lake Frank surrounded by forest - not exactly where most people breathe the air. The county needs a network of near-road air quality monitoring stations to accurately enable assessments of public health and to daylight equity issues.</i></p>		

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50.	Urgency of climate change.	<i>Considering the urgency of climate change and other environmental issues in the County, we believe that strong actions with certain goals are necessary to achieve sustainability, even as the many details of implementing these actions will be left to the future.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Planning staff and staff from the Montgomery County Department of Environmental Protection are working together to make sure that the recommendations of Thrive Montgomery 2050 and the County's Climate Action Plan are coordinated to achieve the County's climate change goals.
51.	Protection of rural areas and the county's drinking water supply.	<i>Our vision for 2050 is a County in which low density and rural areas in the County (those areas outside the Sewer Envelope) are afforded special protection since these areas contain watersheds which contribute drinking water to millions of people in the DC area from the WSSC Water Filtration Plants and the Little Seneca Lake emergency drinking water reservoir. Astonishingly, the County water supply is mentioned in only one paragraph (Policy 6.2.3) on page 101. Our drinking water sources need to be protected by new Drinking Water Special Protection Areas, downzoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, etc.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Protection of watersheds and aquifers is also recommended in Policy 6.5.6. These comments will be considered to inform revisions and reorganization of the draft plan.
52.	The Plan Vision: "This pattern of sustainable growth and development creates multiple benefits for Montgomery County and results in a future county that is: Urban. Compact form of development, coupled with conservation of the Agricultural	<i>WMCCA Comment: This is unrealistic. With compact development comes more impervious surfaces which leads to degraded stream water quality. Unless compact (read more dense) development is balanced by down-zoning of other areas, the amount of impervious surface in the county will increase. We call for down-</i>	Kenneth Bawer for West Montgomery County Citizens Association, David Blockstein, Clean Energy	Staff believes that the issue of compact development and stormwater runoff is more complex than this. Redevelopment and infill development on previously developed sites with high impervious cover, low tree canopy, and nonexistent or ineffective

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	Reserve, has proven to be better for the environment resulting in improved stream water quality.” (P. 46)	<i>zoning and increased protections in the low density and rural areas outside of the sewer envelope to balance the proposed increased density areas. Plus, conservation of the Ag Reserve is already under attack with the proposal for commercial solar.</i>	Working Group, Takoma Park Mobilization Environment Committee	stormwater treatment offer opportunities to control runoff, or at least allow for growth without increasing existing imperviousness. And, while the draft Plan includes recommendations to protect streams and watersheds that apply to low-density and rural areas, this will not improve streams and water quality in our development areas. Each watershed should be protected and improved to the extent possible.
53.	Vision for Healthy and Sustainable Environment: “Reuse, recycling and composting of food and yard waste results in very little municipal solid waste generation.” (P.97)	<i>WMCCA Comment: With respect to reuse, county solid waste transfer stations must allow residents to remove items (such as electronics, metal items, etc.) for reuse instead of shipping it away. Home hobbyists can repair electronics, and do it yourselves can find uses for metal scraps and perfectly good metal filing cabinets, for example. This will, presumably, require signing of liability waivers, but this is already routinely done at Parks events.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These recommendations are too specific and operational for a policy-focused general plan, but should be considered by other government agencies for implementation under programs and policies that they administer.
54.	The Plan Vision: “County residents enjoy an active, healthy lifestyle. Connecting to the outdoors and their neighbors boosts their physical and mental health. Every resident has walkable access to opportunities for social engagement, physical activity, and quiet contemplation, whether in parks or other public spaces. The county’s built and natural resources are designed to	<i>WMCCA Comment: Increased housing density will probably not lead to increased physical health. Most urbanized areas suffer from reduced air quality due to more vehicular traffic. Assuming a gradual conversion to all electric vehicles, increased urbanization will hurt the health of residents within the time span of Thrive 2050.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The Vision statement describes a desired future state. Denser development that includes access to opportunities for beneficial exercise in a more healthful environment should lead to better health outcomes.

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	encourage physical activity. Fewer vehicles using clean energy, have resulted in drastically reduced greenhouse gas emissions.” (P. 46)			
55.	Hard surface soccer courts.	<i>I'd like to urge the county to consider developing more purpose-built facilities for playing soccer on hard courts in urban areas. While soccer is traditionally played on grass, in many urban environments, soccer is played on any flat open surface available, most often on concrete. In fact, globally, a specific form of soccer has even been formalized and called "Futsal" due to the prevalence of playing the game on concrete. Here in Montgomery County, because of the availability of lights and the low barriers to entry (no permitting necessary), soccer is often played on tennis courts throughout the county. I'd propose the county take two routes: 1. Convert underutilized tennis courts into soccer courts 2. Develop shared, multi-purpose facilities that include concrete spaces for soccer</i>	Matteo	Staff concurs. A “Sports Court Working Group” has been initiated and a phase 1 study has been completed. Unfortunately, its work has been delayed due the pandemic and limited resource.
56.	Update of current stormwater regulatory controls.	<i>The emphasis on urbanism as a strategy to protect natural spaces and reduce sprawl, while concentrating development around transit corridors is a balanced approach to sustainable development. Urbanism will ensure that county residents can easily access basic needs within a short distance and prioritize affordable and attainable housing. However, we would like to see an increase protection on stormwater</i>	Denisse Guitarra for Advocate Audubon Naturalist Society	Staff agrees. This is intended in the recommendations of Policy 6.2.4, “Plan and design new utility infrastructure, including electrical, water and sewer, stormwater, communications, and other infrastructure and improvements that incorporate climate change mitigation and adaptation strategies to ensure service continuity during

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		<i>management that not only meets but exceeds our current stormwater regulatory requirements in order to accommodate the upcoming increase in frequent and heavier rainstorms due to climate change.</i>		major hazard events,” and Action 6.2.4.a, “Create performance standards for utility infrastructure to mitigate and adapt to climate change and track the effectiveness of climate adaptation strategies for infrastructure.”
57.	Integrate environmental sustainability	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	These comments will be considered to inform revisions and reorganization of the draft plan.
58.	Current stream valley buffer standards.	<i>Another matter we would like to address is the counties current standards regarding Stream Valley Buffers and the unintended consequences of requiring them on sites that have been previously developed within urban areas. An amendment to the general plan sets the vision for numerous other planning documents and policies, and provides the opportunity to revise or improve upon the existing policies in response to the changes that have evolved over the past several decades. Stream Buffers in Urban Areas Stream buffers contained in the County’s Environmental Guidelines were written for a different era when most development occurred on greenfield site that were either wooded or in agriculture. At this time, less was known about pollutant loading rates for Nitrogen and Phosphorous based on different land uses so a surrogate (conservative set aside)</i>	Griffin Benton, MBIA	Vegetated buffers and catch basins remain the most effective and inexpensive way of filtering these pollutants from stormwater. Given that the County now faces increased requirements for removing these pollutants under the TMDL guidelines for protecting the Chesapeake Bay, there is a need to remain focused on the removal of these pollutants from our stormwater and stream systems. Stream buffers provide many other important environmental functions and benefits in addition to reducing nitrogen and phosphorus. Staff recognizes that there are special problems created by trying to impose buffers in areas that were developed prior to the establishment of stream buffer regulations, and looks forward to working with MBIA and others to

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		<i>was used in the place of actual data or science.</i>		create appropriate standards and approaches to improving runoff quality as a part of the infill and redevelopment that we all support, as part of the implementation of the recommendations in Thrive Montgomery 2050.
59.	Update Infrastructure Policy.	<i>A policy should be added to the draft Plan regarding the need for updated infrastructure in each instance infill development is occurring... 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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Please see Policy 6.2.4, , “Plan and design new utility infrastructure, including electrical, water and sewer, stormwater, communications, and other infrastructure improvements that incorporate climate change mitigation and adaptation strategies to ensure service during extreme hazard events,” and Action 6.4.4.a, “Create performance standards for utility infrastructure to mitigate and adapt to climate change and track the effectiveness of climate adaptation strategies for infrastructure.” This recommendation would necessarily have to include forecasts for the additional demands placed on infrastructure by anticipated infill and redevelopment.
60.	Urbanism as Key to True Sustainability Montgomery County has been a pioneer in protecting and preserving its natural environment. (P. 97)	<i>WMCCA Comment: Change to, “Montgomery County strives to be a leader in protecting and preserving its natural environment.” Again, there is no way we can claim to be a pioneer or leader when we are trashing our natural areas by doing so-called “stream restorations” which convert natural (although not always</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.

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		<i>pristine) areas into engineered stormwater conveyances (with some exceptions such as “daylighting” piped streams and concrete culvert removal).</i>		
61.	Together, these two land uses [Agricultural Reserve and parkland] and numerous regulatory mechanisms and policy initiatives have put the county in the forefront of environmental protection in the country. (P. 97)	<i>WMCCA Comment: Much as we would like, this statement is demonstrably false. Again, there is no way we can claim to be in the forefront of environmental protection in the country when we are trashing our natural - areas by doing so-called “stream restorations” which convert natural (although not always pristine) areas into engineered stormwater conveyances (with some exceptions such as “daylighting” piped streams and concrete culvert removal).</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.
62.	Need for more specific guidance to achieve sustainability.	<i>Our vision for 2050 is a County that has taken stronger actions to achieve sustainability. We believe that sustainability should be a prerequisite for economic growth. Even as Thrive Montgomery 2050 is a conceptual plan, actions to protect and remediate the environment such as “conduct a study” and “develop a plan” are so general as to be potentially ineffective.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The general plan must have the right balance between too prescriptive for a 30-year high level policy plan, and being too general. General Plans typically are implemented through subsequent studies and plans that, on the basis of the General Plan’s policy guidance, can analyze and address specific issues in a more focused and tactical way than is appropriate for a high-level policy plan. These subsequent plans/studies are the venue to be sufficiently detailed to bring about an effective and positive outcome to ensure that the county is developed sustainably. Staff will examine plan recommendations for

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				potential improvements in clarity and purpose.
63.	Protection of ground water and drinking water supply.	<i>Furthermore, the residents in these rural and low-density areas that have well water need to have their groundwater supplies protected. To protect our drinking water supply, these areas should be accorded policies such as severe limitations on sewer line extensions (including closing loopholes and backdoors in the Water & Sewer Plan such as the abutting mains policy and the Potomac peripheral sewer service policy) coupled with education for septic system owners on proper care and maintenance of their systems. Our vision for 2050 is for a County that is no longer totally negligent on this issue - to date there are no required septic inspections, no required pump-outs, and no proactive education programs.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff agrees with the importance of protecting our drinking water supply. However, these comments are too specific for a 30-year general Plan and more appropriate to be addressed by the Water Resources Plan and the Water and Sewer Plan.
64.	Protection for well water quality	<i>The county is forcing our 30,000 septic system owners to go it alone until their systems fail and the County can recommend sewer line extensions as the only option.</i> <i>Currently, there is little protection for well water quality in Montgomery County and the state. Our vision is that the County ask our legislators to support the Maryland Private Well Safety Program bill (once finalized)</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff agrees with the importance of protecting our drinking water supply. However, these comments are too specific for a 30-year general Plan and more appropriate to be addressed by the Water Resources Plan and the Water and Sewer Plan.
65.	Innovative septic systems and stormwater controls in rural areas.	<i>Our vision is for the County to help fund research for new, innovative septic systems at the University of Maryland. Also, in the</i>	Kenneth Bawer for West Montgomery	Staff supports the recommendations for innovative approaches to address issues related to septic systems and

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		<i>rural and low-density areas, our vision is for severe limitations on new road construction and road widening, and stricter requirements to control stormwater and impervious surfaces than within the sewer envelope. And our vision is that the County reaffirm its opposition to a second Potomac River crossing in western Montgomery County.</i>	County Citizens Association	reduction of impervious surfaces in rural and non-skewed area. However, these comments are too specific for a 30-year general Plan and more appropriate to be addressed by the Water Resources Plan and the Water and Sewer Plan.
66.	All decisions and policies to be informed by science.	<i>Our vision for 2050 is a County where all decisions and policies are informed by science. Decisions will be based on the fact that any amount of impervious surface degrades our water quality (as exemplified by the continuing battle for Ten Mile Creek).</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff agrees that decisions and policies must be informed by science. Staff recognizes the importance of reducing imperviousness, and supports this in the draft Plan through Policy 6.5.1 “Minimize imperviousness by limiting and removing unnecessary impervious surfaces while respecting goals, needs, and conditions in different parts of the County” (this includes the need to protect especially sensitive and high-quality watersheds), and Action 6.5.1.a, “Research and create guidance for innovative development, retrofit and construction designs, and techniques that minimize imperviousness.”
67.	Stormwater management and stream restoration.	<i>Our vision is that, if stormwater runoff is mandated to be controlled outside of stream valleys, there would be no reason for stream construction work.</i> <i>Our vision for 2050 is a County where the use of synthetic turf fields is prohibited.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Watershed restoration is a process, and the first necessary step is reducing damaging, erosive stormflows to stream systems. But, once stormwater controls are in place, streams that have re-engineered themselves to

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				accommodate artificially higher and flashier flows will not necessarily return to a natural condition, stop contributing sediment from streambank erosion to stream beds and downstream waters, and reestablish aquatic habitat. In these cases, appropriate stream restoration measures may be needed to reestablish healthy stream geomorphology and habitat, and reduce water quality degradation. The issue of synthetic fields is beyond the scope of the General Plan.
68.	Air and water quality	<i>Our vision for 2050 is a County that is finally honest about air and water quality conditions. The county must commit to honestly reporting true air quality conditions to residents. Currently, we have a single air quality monitoring station in the middle of an open field near Lake Frank surrounded by forest - not exactly where most people breathe the air. Our vision is for a network of near-road air quality monitoring stations to accurately enable assessments of public health and to daylight equity issues.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff will pass this comment along to MCDEP, which is the lead agency for air quality monitoring.
69.	Balance any up-zoning along development corridors and centers with downzoning in other areas.	<i>Our vision for 2050 concurs with the need to concentrate density along transportation corridors to encourage the use of mass transit. However, our vision also balances any up-zoning along development corridors and centers with downzoning in other areas.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. Decisions to upzone or downzone should be informed by the context and the desire to meet a specific goal. Additionally, downzoning risks limiting the ability of the county to meet its housing

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		<i>This includes the protection of our low-density and rural areas outside of the sewer envelope from creeping sewer sprawl (and resulting development pressure to increase zoning density once sewer lines are extended).</i>		supply gap or future infill development opportunities.
70.	Public health issues and initiatives.	Public health should be incorporated by emphasizing priority areas determined by obesity, behavioral health, diabetes, and cardiovascular disease. The plan should include policies that establish partnerships such as the Healthy Montgomery Transforming Communities Initiative. The plan should also include descriptors of a healthy environment such as clean water, value of clean air, value of parks and health living, and value less road miles to maintain the value of human life.	David Helms, Pedestrian, Bicycle, Transportation Safety Advisory Committee	Staff concurs. The 'Parks and recreation for an increasingly urban and diverse community' chapter is expected to cover this topic.
71.	Density and Covid-19 pandemic.	A lot of the material seems to be written before the COVID pandemic. In light of the pandemic, many health officials suggest density may drive higher infection rates, and many of the concepts in the plan push for higher density solutions. As for middle market housing, where will it be built? In already dense areas and create even more density? I want to make sure that public health officials and advisors will have input.	Peter Rizik	Analyses to date looking at the experiences of very dense cities across the globe with large populations have noted that other factors, rather than the density of the built environment, have been drivers of COVID transmission in those environments. The Department of Health and Human Services have been included among those agencies partnering with the Planning Department in developing the draft Plan.
72.	More funds for recreational use of the Agricultural Reserve, especially trails.	The Commission should allocate more funds for recreational use of the Agricultural Reserve, especially trails.	Dave Scull, Kathleen Mihm	Comment noted.

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73.	<p>Goal 6.1: Use a compact form of development including a mix of uses and reduced reliance on cars to create and support a variety of urban, suburban and rural places that benefit human health. Encourage active lifestyles to reduce our carbon footprint, mitigate climate change, and protect natural resources.</p> <p>Policy 6.1.1: Accommodate growth through a compact, bikeable, walkable, mixed-use form of infill and redevelopment to create long-term sustainability for both human and environmental health.</p> <p>Policy 6.1.2: Develop compact development strategies suitable for different parts of the county to more efficiently use or redevelop sites as much as possible and create walkable, bikeable neighborhoods. Use smart growth principles and best practices to increase open spaces for active recreation.</p> <p>Policy 6.1.4: Direct new development and redevelopment to areas with existing or master-planned infrastructure to support the concepts of compact form of development and Complete Communities, and to avoid sprawl.</p>	<p><i>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.</i></p>	<p>Dan Wilhelm for Greater Colesville Civic Association</p>	<p>These comments will be considered to inform revisions and reorganization of the draft plan.</p>

No.	Issue/Topic Area	Comment	Commenter	Staff Response
74.	Policy 6.1.3: Plan in three dimensions. Creatively integrate and use different building levels, from below ground to rooftops, to provide sustainability benefits in densely developed areas. Examples include using underground spaces for stormwater, utilities, and soil volume for trees; using terraces, building step-backs, and rooftops for gathering spaces and vegetation; and using building faces and rooftops for solar energy generation.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft plan.
75.	Proposed addition to Policy 6.1.4	<i>Add: Proposed Addition to 6.1.4 and in the introductory pages of the general plan: Expansion of the current sewer envelope should be extremely restricted. Mitigate current and prevent future highway and arterial level non-transit traffic in areas outside the current sewer envelope.</i>	Scott Plumer for Darnestown Civic Association	These comments will be considered to inform revisions and reorganization of the draft plan.
76.	Goal 6.2: Mitigate, reduce, and adapt to climate change through land use and infrastructure that is more resilient to climate change and moves the county to a climate positive future. Action 6.2.1.a: Develop guidelines and standards for climate-sensitive design principles and materials for new public and private development projects. Ensure these standards include strategies to maximize greenhouse gas reductions in the built environment, including approaches for generating clean	<i>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.</i> <i>The idea of action 6.2.1.a 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</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft plan.

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	renewable energy and reducing heat island effect.	<i>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)</i>		
77.	Policy 6.2.3: Upgrade the county's water supply and distribution systems to withstand the effects of climate change and continue to meet the county's current and long-term needs for safe and adequate drinking water supply. (P. 101)	<i>WMCCA Comment: Our vision for 2050 is a County in which low density and rural areas in the County (those areas outside the Sewer Envelope) are afforded special protection since these areas contain watersheds which contribute drinking water to millions of people in the DC area from the WSSC Water Filtration Plants and the Little Seneca Lake emergency drinking water reservoir. Astonishingly, the County water supply is mentioned in only one paragraph (Policy 6.2.3) on page 101. Our drinking water sources need to be protected by new Drinking Water Special Protection Areas, downzoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, etc.</i>	Kenneth Bawer for West Montgomery County Citizens Association	There is also Policy 6.5.6, which calls for the protection of watersheds and aquifers, and the improvement of water quality and stream conditions. These will not only protect drinking water, but aquatic habitats, as well. These specific actions should be considered for implementation but are too specific and prescriptive for a 30-year plan.
78.	Adequate and safe supply of drinking water.	<i>Policy 6.2.3 - Reword: "Integrate climate change with the planning efforts on the County's water supply to ensure that an adequate and safe supply of drinking water will be available to meet current and future needs."</i>	WSSC Water	These comments will be considered to inform revisions and reorganization of the draft plan.

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79.	Goal 6.3: Improve health and well-being for all Montgomery County residents and address the health disparities that currently exist.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	This goal is about health and not healthcare. The social determinants of health play a very large part in the overall health of individuals and communities. The new Parks chapter will cover the health issue through parks and recreation facilities.
80.	Goal 6.3: Improve health and well-being for all Montgomery County residents and address the health disparities that currently exist. Policy 6.3.5: Promote active and healthy lifestyles and active transportation including walking and biking for all segments of the population in all parts of the county, by maintaining and improving built and natural environments. Ensure that all county residents in urban and suburban communities have access to a park or open space within walking distance from their homes. Enhance and protect our park system of natural and built elements to promote and increase opportunities for healthy active lifestyles and physical fitness. Foster human-to-human and human-to-nature connections. (P. 102)	<i>WMCCA Comment: Add: Increase access to parks by asking for (possibly in exchange for a tax credit) or purchasing (via eminent domain) public access points (i.e., short connector trails between homes from a road or sidewalk to parks. There are miles of parkland that is not easily accessible within neighborhoods because there are extremely limited access trails. Examples include both Muddy Branch and Watts Branch SVPs.</i> <i>WMCCA Comment: Add: One way the County will protect our park system of natural elements is to ban so-called “stream restorations” which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances (with some exceptions such as “daylighting” piped streams and concrete culvert removal).</i>	Kenneth Bawer for West Montgomery County Citizens Association,	Staff agrees with the first comment. Community connectors on non-parkland to the park trail network are being evaluated as part of the Pedestrian Master Plan and on-going trail planning. Staff are always looking for ways to improve access to the trail network, including community requests. Staff disagrees with the second comment. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.
81.	Policy 6.3.7: Achieve nighttime light levels near natural areas that protect wildlife and enhance our ability to enjoy the night sky. (P. 102)	<i>WMCCA Comment: Change to read, “Achieve nighttime light levels near natural areas and residential areas....”</i>	Kenneth Bawer for West Montgomery County Citizens Association	These comments will be considered to inform revisions and reorganization of the draft plan.

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82.	Goal 6.4: Provide all residents with safe, convenient access to affordable, healthy foods.	<i>Goal 6.4. Delete this goal since it is federal responsibility to regulate food safety.</i>	Dan Wilhelm for Greater Colesville Civic Association	The draft Plan is recommending safe and convenient access to affordable, healthy foods. Providing equitable access to places to purchase and grow healthy food is a land use issue. The draft Plan does not address food safety.
83.	Food deserts	<i>Creating mixed-income communities should be considered a key strategy for eliminating food deserts and providing access to healthy foods.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
84.	Goal 6.5: Preserve, restore, enhance, expand, and sustainably manage natural and other green areas to support human life and a diversity of animal and plant life. Provide appropriate and accessible outdoor recreation opportunities for all.(P. 103)	<i>WMCCA Comment: New Action: Create private–public partnerships to align the profit motives of individuals to the environmental sustainability of the County</i>	Kenneth Bawer for West Montgomery County Citizens Association	This recommendation seems more appropriate for other County agencies to consider.
85.	Sustainability, climate change and density.	<i>There are lots of good policy ideas and recommendations in the draft. But there are a few shortcomings that I'd like to highlight. First of all, nature seems like a sidebar. Section 6.5 has more study than specific actions. Forest protection is identified as something to be studied. Climate change needs to be central to this document, not just stuck away in Section 6.2. Density is not panacea. Montgomery County is urban. It's suburban. It's rural. Density by itself does not decrease stormwater runoff or mitigate climate change.</i>	David Blockstein, Clean Energy Working Group, Takoma Park Mobilization Environment Committee	The recommendations for study are accompanied by actions that should result from the studies: Study forests with high value for climate mitigation and establish forest and tree canopy goals; study the SPA program and determine what changes are needed to make it more effective; Study the Forest Conservation Law and identify improvements, including guidelines for planting native trees in restoration projects and development projects. Specific recommendations to expand forests include Policy 6.5.2 and Action 6.5.2.a, which recommend both

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				<p>protecting and expanding existing forests and non-forest tree canopy and establishing canopy goals and strategies; Actions 6.5.2.c and 6.5.2.d and Policy 6.5.5, which recommend developing guidelines for forest and tree management plans, including planting native species and controlling invasive species; and Policy 6.5.6, which recommend the use of green streets and increased tree canopy to help manage stormwater and improve stream water quality. The Arts, Design and Culture section includes Action 8.3.3.c, which recommends creation of an Urban Tree Canopy Assessment and policies to regain and exceed 1990 tree canopy levels and a countywide policy for no net loss of tree canopy. Environmental sustainability and climate change are a major focus of the draft Plan. Density is one of the tools to achieve the environment related goals of the Plan.</p>
86.	Healthy lifestyles and active recreation.	<p>We must encourage healthy lifestyles and parks can really help. The mindset that parks can be good stewards of the land and strongly support active recreation is really a key element of the plan. An area that didn't come across as strongly is that we have an opportunity to build a really strong regional trail network. Put parks near as many</p>	David Magill, Mid-Atlantic Off-Road Enthusiasts	<p>Staff agrees. The Department of Parks is committed to ensuring equitable access to the park trail network, which is a central component of the 2016 Countywide Park Trails Plan. We also recognize the importance of adding trails in urban areas for more local trail</p>

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		neighborhoods as possible with trails or exercise features and connections wherever possible.		experiences that don't require a long time commitment and meet the needs of people looking for shorter trail-based experiences. The new park chapter is expected to address active lifestyle as a key point.
87.	Policy 6.5.1: Minimize imperviousness by limiting and removing unnecessary impervious surfaces while respecting goals, needs, and conditions in different parts of the county. (P. 103)	<i>WMCCA Comment: New Action: Prioritize limiting and removal of unnecessary impervious surfaces to achieve related goals, especially for MS4 permits.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Policy 6.5.1 recommends that we minimize imperviousness by limiting and removing unnecessary impervious surfaces.
88.	Policy 6.5.2: Protect, enhance, and increase the coverage, connectivity, and health of natural habitats such as forests, non-forest tree canopy, wetlands, and meadows through land acquisition, easements, habitat restoration, and ecosystem management. (P. 103)	<p><i>WMCCA Comment: Add: One way the county will accomplish this is by banning so-called "stream restorations" which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.</i></p> <p><i>WMCCA Comment: New Action: Perform educational outreach and provide incentives to cultivate private land by sustainable methods including organic lawns, native plants, meadow restoration, and zero-emission electric tools.</i></p> <p><i>WMCCA Comment: The need for safe passage for wildlife between protected areas is critical to ensuring the healthy genetic diversity of animal and plant populations to withstand the challenges of habitat fragmentation and climate change.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association	<p>Staff disagrees with the first comment. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.</p> <p>Regarding the cultivation of public land, draft Plan's recommendations help establish a land use framework to do this. The educational outreach and incentives themselves would more properly be an action item to be undertaken by MCDEP, or perhaps the Montgomery County Office of Agricultural Services.</p> <p>Policy 6.5.2 specifically includes the word "connectivity" in the recommendation to "Protect,</p>

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				enhance, and increase the coverage, connectivity, and health of natural habitats” in recognition of the critical need to protect and connect habitat and safe passage corridors for wildlife and plants, and to heal fragmentation.
89.	<p>Action 6.5.2.a: Conduct a study to identify forests and other natural areas with high value for climate mitigation, resilience, and biological diversity. Establish appropriate forest and non-forest canopy goals and strategies to protect plant and wildlife diversity and human health.</p> <p>Action 6.5.2.b: Conduct a study of the Special Protection Area (SPA) program law, regulations and implementation and determine what changes are needed to achieve the original SPA program goals and objectives.</p>	<i>WMCCA Comment: Our drinking water sources need to be protected by new Drinking Water Special Protection Areas that may include down-zoning, purchase of land outright or via eminent domain, enhanced tax credit for conservation easements, lower impervious surface caps, greater stormwater management requirements, etc.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These specific actions should be considered for implementation, but are too specific and prescriptive for a 30-year plan.
90.	Action 6.5.2.c: Study the County Forest Conservation Law and regulations intended to preserve specimen and champion trees. Identify improvements to the law and regulation’s effectiveness and efficiency, including guidelines of native trees for inclusion in development and natural area protection projects that are resilient to climate change and support native wildlife, including pollinators.	<i>WMCCA Comment: New Action: Perform outreach and develop incentives to conserve forests on private lands. Increase accountability and penalties for violations.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Policy 6.5.4 recommends creating incentives and programs to preserve and enhance privately owned forest land. Increasing accountability and penalties could be considered as ways to improve the Forest Conservation Law’s effectiveness and efficiency and should be considered as this action is developed during implementation.

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91.	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.	<i>WMCCA Comment: New Action: Create a million-tree initiative for Montgomery County. Plant 1,000,000 native trees on public and private lands by 2030.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff does not believe this idea belongs in a 30-year policy plan, but would be happy to work with other County agencies and environmental advocacy groups to discuss and consider how to implement this proposed action.
92.	Policy 6.5.3: Design and construct transportation and other infrastructure improvements using environmentally sensitive methods. Policy 6.5.4: Preserve and enhance privately owned forest land through incentives and other approaches such as easements, forest mitigation bank programs, or transfer of development rights.	<i>WMCCA Comment: New Action: Perform educational outreach and develop incentives for partial and total conservation easements on private forest land.</i> <i>WMCCA Comment: New Action: Develop incentives to cultivate native trees that are robust to climate change on private forest land.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Policy 6.5.4 recommends creating incentives and programs to preserve and enhance privately owned forest land, using approaches that could include easements, forest mitigation bank programs, and transfer of development rights. Action 6.5.2.c includes a recommendation to develop guidelines for native trees that will be resilient in the face of climate change, for planting in development areas and natural areas.
93.	Policy 6.5.5: Reduce and manage invasive and other problem species to levels that pose no significant threats to green areas.	<i>WMCCA Comment: New Action: Perform educational outreach and develop incentives to reduce invasive and other problem species to insignificant levels by 2030.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Policy 6.5.5 already addresses invasive species.
94.	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.	<i>WMCCA Comment: Add: One way the county will protect streams is by banning so-called "stream restorations" which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.

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		<p><i>WMCCA Comment: New Action: Create a County–State partnership to improve the integration of wetlands management and enforcement into County operations.</i></p> <p><i>WMCCA Comment: Actively work with WSSC to propose and implement watershed protection plans for those watersheds that feed into WSSC Water Filtration Plants (for example, as an alternative to the previously proposed mid-Potomac River intake extension). This will NOT include so-called “stream restorations” which convert natural (although not necessarily pristine) areas into engineered stormwater conveyances.</i></p>		
95.	Action 6.5.6.a: Develop incentives for developers to restore existing streams and daylight piped streams during the redevelopment process.	<p><i>WMCCA Comment: No, no, no. Reword to say, “Develop incentives for developers to daylight piped and cement culvert-bound streams during the redevelopment process.” Other than that, most so-called “stream restorations” convert sections of natural stream valleys into artificial, engineered stormwater conveyances.</i></p>	Kenneth Bawer for West Montgomery County Citizens Association	Staff disagrees. There are examples of successful stream restoration projects in Montgomery County. There are various stream restoration techniques that can help improve stream water quality and habitat, to the benefit of both the natural and the human environment.

Complete Communities (Revised--Theme #2: Complete communities: mix of uses and forms)

No.	Issue/Topic Area	Comment	Commenter	Staff Response
1.	Complete Communities, 15-minute living, cost estimates, and equity in education.	<i>Thrive advocates not just for housing, but housing in Complete Communities, 15-minute living with lots of services within a 15-minute walk or bike ride. The cost of transforming—how many of our communities?--into 15-minute living is not mentioned, nor are the trade-offs. For Equity, are we better off with 15-minute living or investing in early childhood education and schools? This plan is silent on education and on how to assure that there is complete Equity in education, even though that's where the multi-generational benefit is.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	Thrive Montgomery 2050, like other General Plans, does not provide cost estimates. The purpose of a General Plan is to establish a long-term vision for the county and a framework for reaching that vision. In terms of overall equity, the draft Plan envisions a multi-faceted approach. It recommends using newly developed equity analysis tools to look at barriers and access to many things including jobs, transit, parks, and public facilities, including schools, just to name a few. M-NCPPC defers to MCPS for strategic planning around educational equity in the county. Thrive Montgomery 2050 can address affordable housing and equitable access to jobs and services, which contribute to inequities in education.
2.	The concept of Complete Communities needs more work.	<i>There's an underlying assumption that "Complete Communities" are the answer to economic development, but that is not clear, demonstrated or proven. People want to work near where they live if possible, but they also want to live in areas/neighborhoods with good schools, recreation, parks and other amenities. The plan spends lots of time on Complete Communities without explaining where jobs are located, and how jobs are part of the 15-minute living. The plan needs to</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	The idea of Complete Communities, including the relationship between jobs and Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.

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		<i>better explain how Complete Communities fit with our residents' employment.</i>		
3.	The concept of Complete Communities needs more work.	<p><i>The 15-minute Complete Community is not adequately described and fleshed out across the County.</i></p> <p><i>...the description of Complete Communities is in part unacceptable vague, which viewed another way, amounts to a lack of reasonable transparency on what is proposed.</i></p> <p><i>The Thrive Montgomery 2050 Draft Plan fails to show that Complete Communities are likely to be viable and workable across the County.</i></p> <p><i>The Thrive Montgomery 2050 Draft Plan fails to justify a core premise that there will be sufficient employment in Complete Communities to make them viable.</i></p> <p><i>The Thrive Montgomery 2050 Draft Plan fails to justify an economic assumption that Complete Communities will have viable commercial elements.</i></p> <p><i>The notion of local schools that children can walk to in Complete Communities is both wholly unrealistic and potentially socially problematic.</i></p> <p><i>As to zoning, if the Complete Communities are to be successful, they must have real public space and real open space. The Planning Board should recommend changes to the Zoning Ordinance on what counts as public use space and open space.</i></p>	Lloyd Guerici	The idea of Complete Communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.

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4.	Need more definition of urban, suburban and rural areas.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	<p>The draft Plan proposes to direct all future growth to transit station nodes along major corridors served by infrastructure and amenities as well as utilize infill development and redevelopment opportunities to create urban, suburban and rural Complete Communities.</p> <p>The Planning Board Draft Plan will further define urban, suburban and rural Complete Communities, as well as provide guidance for the areas not located along major corridors or within Complete Communities.</p>
5.	Healthy environments equal healthy communities, 15-minute living.	<i>We support the approach and emphasis given in the plan to connect people to their environment and promote healthy and active lifestyles as stated in the “15-minute living” policy recommendation. We support increasing access to green spaces for all people while simultaneously working to eliminate structural barriers that prevent individuals from accessing nature.</i>	Denisse Guitarra for Audubon Naturalist Society	Staff concurs.
6.	The concept of Complete Communities needs more work.	<i>The idea of Complete Communities with 15-minute living is the land use answer to many of the issues we are facing today including the racial and economic segregation of our communities, housing affordability, and increased greenhouse gas emissions from vehicle miles traveled. This is a remarkably sweeping assertion, yet one looks in vain for evidence or</i>	Herb Simmens	Staff disagrees. The idea of Complete Communities will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.

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		<i>argument to support this statement. How many of the one million plus residents now experience 15-minute living, how many residents does Thrive aim to have 15-minute living, and what will it take to make it happen? Absent some even order of magnitude estimates, the 15-minute concept is little more than a planning slogan.</i>		
7.	Support Complete communities, transit-oriented development and housing diversity.	<i>Think of complete communities as investments in public health and public safety – communities that have access to quality services, recreation, diverse modes of transportation and economic opportunities, and can support people across income levels promote healthier, safer, and more trusting people. It's the communal experience that creates community, after all, not just the colocation. I want to explicitly highlight enthusiastic support for a transit-first planning ethos, and the abandonment of car-centric design. Likewise for the recognition that diversity in housing types is essential, and should not be limited to new development but ought to focus on making existing communities more adaptable.</i>	Edmund Morris	Staff concurs.
8.	Complete Communities with mass transit and walkability will not attract young professionals.	<i>The goal for Thrive Montgomery is to produce more housing that is affordable and attainable with the idea that the ability to live equitably will attract businesses and will bring jobs to the area. The idea is that Complete Communities</i>	Patricia Depuy Johnson	There is a significant body of research that demonstrates that young professionals seek affordable, walkable places near transit, which in turn attracts employers to the area.

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		<i>with mass transit and walkability will attract young people who will come and jobs will follow. It doesn't work that way.</i>		
9.	The concept of Complete Communities needs more work.	<i>b. Page 32-34. In general, the concept of Complete Communities needs more work. There is no standard definition and no explanation of how 15-minute living will be different in urban, suburban, and rural communities. There are certain critical amenities that are not mentioned, such as healthy food. We also believe it should be explicitly stated that no community is "complete" unless it is racially and economically diverse. There should be no enclaves of whiteness, wealth, or poverty in Montgomery County.</i>	Jane Lyons for Coalition for Smarter Growth	<p>Staff concurs that access to healthy, culturally appropriate food as well as racial and economic diversity are critical to Complete Communities.</p> <p>The idea of Complete Communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.</p>
10.	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. (P. 33)	<i>We urge you to remove driving from this definition of 15-minute living. The vast majority of county residents already live a 15-minute drive from their daily needs, rendering the Complete Communities a meaningless argument for embracing a more compact, mixed use, sustainable built environment. Moreover, the worldwide concept of the 15-minute neighborhood is specifically focused on walking and biking.</i>	Jane Lyons for Coalition for Smarter Growth	<p>The draft Plan emphasizes walking, bicycling and transit, but recognizes that more suburban and rural parts of the county will continue to require travel by car.</p> <p>While it is true that the traditional concept of a 15-minute has been applied in more urban locations, the draft Plan proposes to adopt the 15-minute living concept to our urban suburban and rural locations. For example, residents may drive to a rural Complete Community, and upon arrival, park the car in one location and walk to stores and other destinations within the town center.</p>

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11.	The concept of Complete Communities needs more work.	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations; Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	Staff concurs. The idea of Complete Communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
12.	The concept of Complete Communities needs more work.	<i>Specify the Proportion of the County that Could Evolve into Complete Communities and Better Consider Transportation Needs for the Other Areas. 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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	The intent is to provide all county residents access to the advantages of Complete Communities to the greatest extent possible while at the same time achieving countywide goals. The Planning Board Draft Plan will further define urban, suburban and rural Complete Communities, as well as provide guidance for the areas not located along major corridors or within Complete Communities.
13.	The concept of Complete Communities needs more work.	<i>The Complete Community is not sufficiently delineated in terms of needed infrastructure, likely business entry and costs. The evolution toward these communities is not fairly described and whether they or the transition toward them are economically and fiscally realistic is not documented. It is problematic that there isn’t even one (although Kensington</i>	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	Staff concurs that the idea of Complete Communities need further definition. The characteristics and elements of urban, suburban and rural Complete Communities, as well as how the county can transition to this form of development, will be considered and

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		<i>apparently approaches being one) in the county, yet the entire county is to be transformed to something unproven for the wide range of conditions (e.g, existing property ownership and uses, and state/county infrastructure that exist across our county, county fiscal condition). In fact, based on the vagaries of the draft plan we have no idea of approximately how many Complete Communities there would be and where they would likely be.</i>		discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
14.	The concept of Complete Communities needs more work.	<i>The ideal of a “Complete Community” – a place where people of all ethnic, racial, religious, socioeconomic backgrounds and ages can live, work and relax within a 15-minute walk, bike or public transit ride – is worth supporting, but I am skeptical that it is realistic. Other than the characteristics I’ve just listed, the Planning Department has not completely defined these communities in other terms.</i>	Phyllis Edelman	Staff concurs that the idea of Complete Communities need further definition. The characteristics and elements of urban, suburban and rural Complete Communities, as well as how the county can transition to this form of development, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
15.	The concept of Complete Communities needs more work.	<i>The Plan should specify the parameters for the diverse urban, suburban, and rural “Complete Communities” that exist throughout the County.</i>	Irene Lane, Town of Chevy Chase Councilmember	Staff concurs that the idea of Complete Communities need further definition. These refinements and clarifications will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
16.	The concept of Complete Communities needs more work.	Unclear if and how complete communities will be executed across the county, they seem better suited for small areas. Complete communities are still undefined	Deborah Ingram, Chevy Chase	Staff concurs that the idea of Complete Communities need further definition.

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		which makes them difficult to assess. Urban, suburban, and rural complete communities should be defined better and specified where they will be located. Focusing on transit hubs seems inequitable since these areas are already populated with amenities, underserved areas should be improved first.		The characteristics and elements of urban, suburban and rural Complete Communities, as well as how the county can transition to this form of development, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
17.	The concept of Complete Communities needs more work.	There is concern around how Complete Communities will be implemented in rural communities such as Ashton. Projects are already being built that diminish Ashton's rural character, such as townhouse developments. Where does Ashton fit into the rural end of the transect?	Amy Medd for Sandy Spring Ashton Rural Preservation Consortium (SSARPC), President of Sandy Spring Ashton Rural Preservation Consortium	Staff concurs that the idea of Complete Communities need further definition. The idea of Complete Communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
18.	The concept of Complete Communities needs more work.	<i>Page 32 (Refer to Figure-19): Planning [MDP] suggests using an urban-to-rural transect to reflect the different contexts of complete communities.</i>	MDP	Complete communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
19.	We need to think about people in places that would not become Complete Communities.	<i>While building Complete Communities will ostensibly solve that issue for residents of those areas, what about those populations in our county who do not live in these Complete Communities? They, too, should be able to access a safe, public space to meet with friends and enjoy the fresh air in</i>	Phyllis Edelman	The intent is to provide all county residents access to the advantages of Complete Communities to the greatest extent possible while at the same time achieving countywide goals.

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		<i>a green, natural environment. If we want to promote equity in all areas, we cannot leave behind any community within our County.</i>		<p>Other chapters of Thrive Montgomery also recommend ensuring residents throughout the county have access to green open spaces and quality public spaces.</p> <p>The Planning Board Draft Plan will further define urban, suburban and rural Complete Communities, as well as provide guidance for the areas not located along major corridors or within Complete Communities.</p>
20.	Accessibility for those unable to walk or bike.	<i>We are excited to see the concept of Complete Communities with 15-minute living in the Public Hearing Draft, including its emphasis on walking and biking for communities in areas like the Randolph Civic Association's. A consideration mentioned throughout the Public Hearing Draft, but not reemphasized in the Complete Communities Section is the importance of accessibility for those unable to walk or bike.</i>	Josh Silverstein, President, Randolph Civic Association	Staff concurs that Complete Communities should emphasize the importance of accessibility for those unable to walk or bike.
21.	Complete Communities and access to food.	<i>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</i>	Catherine Nardi and Heather Bruskin for MC Food Council	Staff concurs that Complete Communities should include multiple food access points to provide communities with access to healthy and affordable food.

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		<i>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.</i>		
22.	Food Security	<p><i>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.</i></p> <p><i>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.</i></p>	Catherine Nardi and Heather Bruskin for MC Food Council	<p>Staff concurs that Complete Communities should include multiple food access points to provide communities with access to healthy and affordable food.</p> <p>These comments will be used to inform revisions and reorganization of the draft Plan.</p>

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23.	Cost of retrofitting existing communities	<i>Creation of Thrive Montgomery's Complete Communities within areas that are fully built out requires the acquisition, demolition and redevelopment of numerous residences. The cost of that is huge – will it be feasible? And the acquisition of land for trails? Parks?</i>	Harold Pfohl, Sumner Village	The implementation of Thrive Montgomery 2050, including the creation of Complete Communities, will be incremental over the next 30 years. As properties along major corridors and within Complete Communities redevelop, there will be opportunities for property consolidation, demolition and redevelopment. This incremental implementation, coupled with financial tools and incentives, publicly owned land and land investment opportunities can advance implementation.
24.	How will the Plan be funded?	<i>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.</i>	Andy O'Hare, President EBCA	As noted in the Implementation Chapter, the county's budget process for public facilities and subsequent detailed land use, facility and infrastructure plans by multiple agencies will identify the specific strategies to implement Thrive Montgomery's policy guidance for Complete Communities.
25.	Provide a map of Complete Communities	<i>This section should provide a map including different types of communities (urban, rural, suburban) and clarify whether or not Complete Communities will be located in the Agricultural Reserve.</i> <i>The Goals, Policies, and Actions for Complete Communities should describe</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Staff concurs that draft Plan should further define urban, suburban and rural Complete Communities and clarify the relationship of these to the Agricultural Reserve. These comments will be used to inform revisions and reorganization of the draft Plan.

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		<i>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.</i>		
26.	Provide a map of Complete Communities	<i>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.</i>	Andy O'Hare, President EBCA	Staff concurs that draft Plan should further define urban, suburban and rural Complete Communities and clarify the relationship of these to the Agricultural Reserve. These comments will be used to inform revisions and reorganization of the draft Plan.
27.	If more complete communities are required, the marketplace can provide for them by the redevelopment of communities.	<i>Complete communities are a choice people can make under the existing master plan. If more complete communities are required, the marketplace can provide for them by the redevelopment of communities. People make choices to residential areas based on their own</i>	Quentin Remein for Cloverly Civic Association	While some people have the means to choose where they live, this is not true for all people in the county. Thrive Montgomery recommends Complete Communities, within urban, suburban and rural areas, to provide access to services and

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		<p><i>choices. Most retail/services are now available for delivery, so people do not even have to live near them. They can choose the type of exercise and play that they choose rather than being forced to accept walking and bike riding.</i></p> <p><i>Again people can make their own choices for places for social gathering rather than being restrained by what is in their neighborhood.</i></p>		amenities to middle and low-income families, in a manner that allows the county to achieve economic health, community equity and environmental resilience.
28.	Single-family housing and the authority of HOA.	<p><i>We support a thoughtful approach to the issues outlined in the plan, but we represent a single family HOA community where people have invested themselves and their money in the belief that the commitment to that style of housing for our neighborhood was clear and absolute. Thus, we expect that any County honor that commitment to us and respect the community's status and authority as an HOA.</i></p>	Mark Quinn President, Heritage Walk Home Corporation (Windermere) HOA	Thrive Montgomery 2050 does not propose to eliminate single-family housing or impinge on the legal authority of an HOA. However, the county has the ability to use zoning and other regulatory controls to achieve its land use and planning goals through a master plan process.
29.	Include strategies to fund the Complete Community concept.	<p><i>We strongly recommend that Thrive Montgomery provide equal weight to the importance of job creation, transit, and housing and include strategies for how public revenue will substantially increase in order to fund the Complete Community concept with its decentralized public facilities, small local schools, and transit infrastructure projects. Essentially, there needs to be a plan for how the County will thrive economically by attracting new</i></p>	Irene N. Lane, Town Councilmember, Town of Chevy Chase	The implementation of Thrive Montgomery 2050, including the creation of Complete Communities, will be incremental over the next 30 years. This incremental implementation, coupled with financial tools and incentives, publicly owned land and land investment opportunities will help implement the Plan's recommendation through current

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		<i>industries, companies and small businesses to the County.</i>		and new financing and funding mechanisms.
30.	Extend the idea of Complete Communities to suburban and rural locations.	<p>The Chamber supports compact development and complete communities. The 1964 Wedges & Corridors plan envisioned strong commercial corridor with residential and retail components. The commercial enterprise component is still lacking. We don't see how 15-minute communities can be executed in decentralized suburbs that depend on cars.</p> <p>The complete communities vision and details need to be extended for suburban and rural communities. There are areas of the county that cannot meet our current transportation needs without increased road capacity.</p> <p>A major solution to housing, transportation, and jobs challenges to bring more jobs upcounty; more jobs in Germantown mean shorter commutes, less congestion, less emissions and the plan needs to explicitly support that goal.</p>	Marilyn Balcombe, Gaithersburg-Germantown Chamber of Commerce	<p>Comment noted. By prioritizing walking and biking, the draft Plan does not intend to undermine the needs of rural and suburban parts of the county that will continue to rely on automobile as the predominant mode of travel.</p> <p>These comments will be used to inform revisions and reorganization of the draft Plan.</p>
31.	The concept of Complete Communities needs more work.	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations, Andrew Saundry	The idea of Complete Communities, including the characteristics and elements of urban, suburban and rural Complete Communities will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.

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32.	Prioritize green space	<i>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).</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Goal 1.3 of the Public Hearing Draft states: “promote active lifestyles by making parks and open spaces a central element of the community.” The characteristics and elements of Complete Communities as well as the role of parks and natural green spaces will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
33.	Assist small businesses	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Policy 3.2.3 of the Public Hearing Draft addresses the preservation and expansion of minority-owned small businesses. Also, Goal 3.4 of the public hearing draft addresses Production, Distribution and Repair (industrial) businesses, which are often small and independently owned. We are considering the addition of further small business-focused policies.
34.	Retain historic preservation	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Historic designations, per Historic Preservation laws and rules, would continue as Complete Communities are implemented. Thrive Montgomery 2050 seeks to preserve and celebrate the county’s historic resources. For example, policy 1.2.3 of the Public Hearing Draft states: “Preserve and support unique gathering places and sites that enhance neighborhood

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				character and reflect local culture. Acknowledge and physically connect Complete Communities to their past through preservation and placemaking in historic and cultural sites, especially in locations where the past intersects with the experience of historically marginalized communities.
35.	Complete Communities and major employment centers.	<i>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?</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	All Complete Communities will not be exactly like. Complete Communities will vary in size, population, and the variety of uses. Larger town centers can have large employers who want to be in those locations. Others, including small business may prefer to be in smaller mixed-use centers within Complete Communities in suburban and rural locations.
36.	The concept of Complete Communities needs more work.	<i>The concept of “complete communities” is relatively new and is currently being applied in urban areas, many laid out with grids or within distinct relatively small neighborhoods. There is nothing comparable in Montgomery County. Nor does the draft plan provide any examples of how this might work here, or the likely differences in complete communities in our rural, suburban, or urban areas (actually semi-urban in contrast to those places, like Paris, Barcelona, and Houston TX already applying complete communities to land use plans). Without this information the</i>	Naomi Spinrad, Chevy Chase West	While it is true that the traditional concept of a 15-minute has been applied in more urban locations, the draft Plan proposes to adopt the 15-minute living concept to our urban suburban and rural locations. Complete communities, including the characteristics and elements of urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan

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		<i>plan's vision is blurred and there is no way to measure success contextually.</i>		
37.	Improving disadvantaged neighborhoods.	<i>This is a serious flaw, given the goals of the plan. By improving I mean providing quality attainable housing to broaden the economic base of such communities, as well as convenient, reliable, affordable, and convenient transit so that it's possible for residents to get to jobs more than 15 minutes away. While the challenge of gentrification must be addressed, enhancing the appeal of lower income communities to both potential residents and businesses should be as important as diversifying established communities.</i>	Naomi Spinrad, Chevy Chase West	Affordable housing and access to jobs and other opportunities for all county residents, especially those in vulnerable communities, is a special focus of the Plan. Many goals and policies in the draft Plan are intended to address these disparities.
38.	Protection against displacement	East County is receiving a lot of attention (FDA consolidation, White Oak Master Plan, Science Gateway Master Plan) and gentrification is a real possibility for these residents, especially since it is a high-minority population. More needs to be done to protect these residents from being displaced.	Christopher Bolton	Please see Goal 5.5 and related policies and actions. <i>Goal 5.5: Minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults. (P. 91).</i>
39.	Need for a racial impact analysis	<i>The investment of areas that have been underfunded, like East County for over forty years is long overdue. The creation of walkable areas as well as bike transit I feel is pivotal for helping meet environmental goals as well as the creation of affordable housing. That being said, I feel that this plan needs to have a racial impact analysis of how this will help benefit the communities that for too long have been</i>	Robert Stubblefield	The theme of Complete Communities includes an action to develop metrics monitoring implementation of recommendations that advance racial equity and social justice and measure outcomes (formerly Action 1.4.2.a). Complete Communities also includes the goal to assess racial equity and social justice impacts across all Montgomery Parks and Montgomery Planning initiatives.

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		<i>left on the margins. Those closest to the pain are the ones that need to be in power and those close to the problem are the ones close to the solution.</i>		
40.	15-minute living	<i>The 15 –minute walk applies to larger town centers but not the areas between them.</i>	Dan Wilhelm for Greater Colesville Civic Association	The idea of 15-minute living will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
41.	The idea of 15-minute living needs more definition.	<i>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...It is unclear [...] how this concept can be applied to rural, suburban, and urban Complete Communities.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	The idea of 15-minute living, and how the idea applies within urban, suburban and rural Complete Communities, will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
42.	The idea of 15-minute living needs more definition.	<i>I suggest adding a 15 minute bus ride to complete community definition. I do not support adding a 15 minute car ride.</i>	Jean Cavanaugh, Silver Spring	The idea of 15-minute living will be considered, discussed and further defined during the Planning Board work sessions to inform revisions to the draft Plan.
43.	15-minute living idea is inappropriate for most of Montgomery County.	<i>A fatal flaw in the Thrive Montgomery 2050 plan is its goal of achieving “15-minute” cities. Although in vogue among city planners, 15-minute cities are simply inappropriate for most of Montgomery County. The idea originated in Paris, where it makes some sense. People in Paris already live in densely populated multi-story apartment buildings in</i>	David S. Forman	While the traditional concept of a 15-minute has been applied in more urban locations, the draft Plan proposes to adopt the 15-minute living concept to our urban suburban and rural locations. Complete communities and 15-minute living will be considered and

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		<i>neighborhoods with streets that can't handle all the automobile traffic, and there are no supermarkets but instead people walk every day to the boulangerie on their block for their daily fresh baguette. But trying to recreate this in Montgomery county except in a few limited locations would be astronomically expensive, disruptive, and unwanted.</i>		discussed further during the Planning Board work sessions to inform revisions to the draft Plan.
44.	The idea of 15-minute living needs more definition.	<i>The concept of 15-minute living also is not adequately defined and developed. We are offered 15-minute living by walking, cycling, driving, and transit. This is all very vague and confusing. Many of the goals specifically talk about a 15-minute walk for all county residents which clearly is impractical. As for complete communities, the concept of 15-minute living does not appear to be a realistic one for a county as large and as sparsely settled as Montgomery County</i>	Deborah Ingram, Chevy Chase	<p>While the traditional concept of a 15-minute has been applied in more urban locations, the draft Plan proposes to adopt the 15-minute living concept to our urban suburban and rural locations.</p> <p>Complete Communities and 15-minute living will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan. Complete communities and 15-minute living will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.</p>
45.	The idea of 15-minute living needs more definition.	<i>Montgomery County is a large, geographically diverse area. We have well defined urban spaces, several large suburban swathes, conventional small towns, and a significant agricultural expanse. 15-minute living will not look the same in Aspen Hill as it does in Chevy Chase. The county can change the nature</i>	Don Slater, Silver Spring	Staff concurs that 15-minute living will not look the same across the county and seeks to better define the idea of Complete Communities and 15-minute living through the Planning Board work sessions to inform revisions to the draft Plan.

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		<i>of the suburbs and get people out of their cars by creating town centers on transit lines. Small towns have always had a level of self-sufficiency that supports 15-minute living. The plan should acknowledge the differences in the existing communities and work within their boundaries</i>		
46.	Include diverse housing in 15-minute living idea.	Car is the only way I can get around, my commute is five miles and takes seven minutes; public transit would take three hours and biking would take one hour. I do hope that we can execute 15-minute communities. This concept should maybe include housing for essential employees that currently rely on their cars for work. It should also go beyond to make sure there's a variety of housing options in every neighborhood.	Sebastian Smoot, Burtonsville	15-minute living means creating Complete Communities, which must have diverse housing types. The draft Plan has multiple recommendations that call for providing multiple housing options in the county.
47.	Need more schools to support 15-minute living idea.	<i>The county needs to work aggressively with the state to build schools in transit-oriented areas to facilitate smart growth. Lack of school capacity should not be a reason to stop dense, diverse, walkable, transit-oriented neighborhoods.</i>	Ethan Goffman, Rockville, Wendy Calhoun	Staff concurs.
48.	Need more schools to support 15-minute living idea.	The key to 15-minute living and better schools is the construction of more schools in disadvantaged areas. An action should be added on building new schools.	Andrew Saundry, Alain Norman, Silver Spring	Staff concurs. Policy 1.1.1 of the Public Hearing Draft states 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." While this policy does not explicitly reference "schools," this important use is implied through "learn."

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49.	The idea of 15-minute living needs more definition.	<i>Fifteen Minute Complete Communities</i> has to be specifically redefined. As Chair Anderson said: "Fifteen minutes can mean many things in Montgomery County." It can mean walking to a neighborhood store, biking 5 miles or driving 15. It can mean "walking to the end of one's driveway." In bad weather (hot, cold, rain, snow) it can mean getting in a car to do simple errands. When buying a week's groceries it also means driving. As far as <i>old people</i> are concerned. We are not about to give up driving and move into a condo even "at 81" as Chair Anderson suggested. You underestimate the 'baby boomers'. We are independent, mobile, like to walk and bike, but depend on a car for vital necessities as well as entertainment. This Plan waves off a significant population in the county. It is not a representative plan.	Patricia Depuy Johnson	<p>The draft Plan emphasizes walking, bicycling and transit, but recognizes that more suburban and rural parts of the county will continue to require travel by car.</p> <p>Complete communities and 15-minute living will be considered and discussed further during the Planning Board work sessions to inform revisions to the draft Plan.</p>
50.	Focus on regulatory controls instead of Complete Communities.	Complete communities is an attractive idea but it is not feasible. Instead, planning should focus on reviewing development regulations to provide developers with certainty and clarity, the duration of the process, what is and isn't allowed, and all the monetary costs they should expect (like school impact fee schedules). Community input should be primarily at the planning phase, and not be required for projects that fit into planning vision for an area.	Salim Furth, Takoma Park	<p>Staff believes that the idea of Complete Communities is essential for achieving our goals of equitable, affordable and diverse housing, reduce greenhouse gas emissions and create more active lifestyle in a sustainable manner.</p> <p>The county strives to create a reasonable and fair development process. An example is the recent</p>

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				improvements through the updated Growth and Infrastructure Policy.
51.	Single- family areas between centers will not change over the life of this Plan.	<i>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</i>	Dan Wilhelm for Greater Colesville Civic Association	Comment noted.
52.	Town centers should largely be along transit corridors.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	The Planning Board Draft Plan will further define urban, suburban and rural Complete Communities, as well as provide guidance for the areas not located along major corridors or within Complete Communities.
53.	Suggested edits.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be used to inform revisions and reorganization of the draft Plan.
54.	Zoning techniques like minimum lot size requirements in single-family neighborhoods created uniform housing, which resulted in neighborhoods defined primarily by income. (P. 52)	<i>WMCCA Comment: It would be more accurate to include the fact that minimum lot size requirements was used to protect drinking water supplies in some areas.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Comment noted.
55.	The lack of housing diversity by unit type and size is also a significant burden for the county's older adults. Most would continue to live in the same neighborhood where they raised their families if there were options to downsize. However, the current pattern of development forces them to continue	<i>WMCCA Comment: What is the evidence to support the above statements? What is the average distance from existing homes of older adults to the closest retirement community?</i>	Kenneth Bawer for West Montgomery County Citizens Association	There is plenty of planning literature and evidence to support the Plan's statement. See Meeting the Housing Needs of Older Adults in Montgomery County, May 2018. https://montgomeryplanning.org/wp-content/uploads/2018/06/Meeting-the-Housing-Needs-of-Older-Adults-

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	to stay in larger houses they don't need or move to locations away from their families and social support network. (P. 52)			in-Montgomery-County-Final5-24-18.pdf
56.	Policy 1.1.1. Every resident should have the opportunity to live, work, play, exercise, shop, learn, and make up of public amenities and services within a 15-minute walk or bike ride. (P. 53)	<i>This is contrary to the statement made about Complete Communities on page 32, which included driving. We prefer this definition.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
57.	<i>The idea of Complete Communities needs more definition for suburban and rural areas.</i>	<i>Goal 1.1 / Policy 1.1.1/ Action 1.1.1.a – the phrase at the very end of this sentence is the crux of my argument “...broad array of Complete Communities throughout the county within the urban, suburban, and rural context”. The draft plan does a great job of laying out the vision for the urban context, the vision needs to be extended for both suburban and rural communities.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	The Planning Board Draft Plan will further define urban, suburban and rural Complete Communities, as well as provide guidance for the areas not located along major corridors or within Complete Communities.
58.	Action 1.1.2.a: Review and revise the zoning categories and requirements in the Montgomery County Zoning Ordinance as needed to accommodate a variety of uses and densities within Complete Communities. (P. 55)	<i>WMCCA Comment: Add, “In conjunction with this, review and revise the zoning categories to 1) better protect our drinking water supplies in those watershed areas that feed into WSSC Water Filtration Plants and Little Seneca Lake (an emergency drinking water source) and 2) better protect rural and low-density areas outside the sewer envelope from sprawl.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The goals, policies and actions in the draft Plan will be discussed and further defined during the Planning Board work sessions to inform revisions to the draft Plan. The recommended edit to Action 1.1.2.a will be discussed with the Planning Board during an upcoming work session.
59.	Need a countywide zoning text amendment for Missing Middle housing.	<i>Policy 1.1.2 - The necessary legalization of missing-middle neighborhood housing is a change of general policy. It should not and as a practical matter cannot be accomplished through individual master plans and rezonings. It requires a zoning</i>	Benjamin Ross	Staff disagrees, While Thrive Montgomery 2050 provides the overall guidance and recommendations to allow Missing Middle housing in appropriate locations the details of implementing

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		<i>text amendment that changes the allowable housing in existing residential zones based on proximity to transit.</i>		the various Missing Middle housing types should be done through a combination of Zoning Text Amendments and local area master plan amendments.
60.	Consider the travel needs of the suburban and rural populations.	<i>Goal 1.1 / Policy 1.1.3 – Prioritize walking and bicycling as the highest priority mode of transportation... and funding of the CIP. This policy will automatically pit the needs of urban areas against suburban and rural communities and downplays the very real need for increased road capacity in suburban areas of the County. I understand that may be the exact intention of the policy, but it doesn't meet the transportation needs of a large portion of the county population.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Comment noted. By prioritizing walking and biking, the Plan does not intend to undermine the needs of rural and suburban parts of the county that will continue to rely on automobile as the predominant mode of travel.
61.	Policy 1.1.3: Prioritize walking and bicycling as the highest priority mode of transportation in communities and the most critical infrastructure needs through master plans, future development, and county funding of Capital Improvements Program (CIP) infrastructure projects.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Comment noted. By prioritizing walking and biking, the Plan does not intend to undermine the needs of rural and suburban parts of the county that will continue to rely on automobile as the predominant mode of travel.
62.	Policy 1.1.3. (P. 54)	<i>In addition to walking and bicycling, buses should also be considered the highest priority modes of transportation.</i>	Jane Lyons for Coalition for Smarter Growth	The goals, policies and actions in the Public Hearing Draft will be discussed and further defined during the Planning Board work sessions to inform revisions to the draft Plan.
63.	Action 1.1.4.a: Further the Missing Middle Housing Study by identifying	<i>WMCCA Comment: For every up-zoned area, there should be an equal downzoned</i>	Ken Bawer for WMCCA	Staff disagrees. Decisions to upzone or downzone should be informed by

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	options and implementation strategies to increase the variety and density of housing types in areas zoned for single-family detached and semi-detached housing, particularly in areas located within a 15-minute walk or bike ride of rail and bus rapid transit (BRT).	<i>area. The down-zoned areas should be given Transfer of Developable Rights (TDRs), similar to what happened in the Ag Reserve, that can be sold to developers in the up-zoned areas. Without a balance between up-zoning and down-zoning, the overall density in the County will continued ratcheting up.</i>		the context and the desire to meet a specific goal. Additionally, downzoning risks limiting the ability of the county to meet its housing supply gap or future infill development opportunities.
64.	Local bus service	<i>Local bus service will not be everywhere outside of town centers, but will exist in some urban and suburban areas.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff concurs.
65.	“Policy 1.1.5: Encourage co-location of essential services such as schools, medical clinics, daycare centers, libraries, and recreation centers within communities to make access to public services and amenities more convenient and accessible by walking and bicycling from home.” (P. 54)	<i>Additional actions are required to ensure the co-location of essential services.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
66.	“Goal 1.1: Retrofit existing communities and create new communities where people can meet their daily needs by walking, bicycling, or transit.”	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be used to inform revisions and reorganization of the draft Plan.
67.	“Goal 1.2: Orient communities around convenient social gathering places accessible to neighborhood residents by walking and biking.”	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff believe that the language of Goal 1.2 is appropriately broad, and not overly prescriptive to discourage innovation by private sector.
68.	“Goal 1.3: Promote active lifestyles by making parks and open spaces a central element of the community.”	<i>In goal 1.3, eliminate the first four words: “Promote active lifestyles by”.</i>	Dan Wilhelm for Greater Colesville Civic Association	Promoting healthy lifestyles is an important goal of Thrive Montgomery 2050. It is supported by strategies to provide better access to parks and recreation facilities and

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				making it easier for people to do more walking and biking in their daily life.
69.	Historic preservation should not be used as a means to downzoning.	<i>Policy 1.2.3 - Add: Preserve the integrity of historic preservation by preventing its use as a backdoor means of downzoning.</i>	Benjamin Ross	These comments will be used to inform revisions and reorganization of the draft Plan.
70.	“Policy 1.3.2: Employ the Energized Public Spaces Functional Master Plan to identify opportunities for new parks or open spaces, such as publicly owned land, property acquisition or public-private partnerships to more equitably serve communities with limited access to parks and public spaces.” (P. 56).	<i>WMCCA Comment: New Action: Move aggressively to acquire new park land through creative measures including the use of imminent domain and bond referendums (see Fairfax County). This must be done in all areas in the county, not primarily down county.</i>	Kenneth Bawer for West Montgomery County Citizens Association	These comments will be used to inform revisions and reorganization of the draft Plan.
71.	“Goal 1.4: Equitably distribute the benefits of land use planning and public and private investment throughout. Ensure that no community is disadvantaged by a disproportionate share of adverse impacts from future land use decisions and investments.” (P.56).	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be used to inform revisions and reorganization of the draft Plan.

Connectedness

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1.	Support connectedness objectives.	We support connectedness objectives of accessibility, transparency, and plain language. We support expansion of communications infrastructure in underserved parts of the county.	Josh Silverstein, Randolph Civic Association	Comment noted.
2.	Segregation in MCPS schools and neighborhoods.	By supporting diverse and adaptable growth, you can impact young student leaders like me that immigrated from their native country in Latin America to pursue the American Dream. Yet students like me are stunted by the segregation in MCPS schools and neighborhoods. My family made the decision to move from Bethesda to Silver Spring, which I am extremely thankful for. I wish to continue to challenge the status quo and realize Montgomery County should be for all, and Thrive 2050 should be for all.	Maria Salmeron Melendez, Silver Spring	Comment noted. The tenets of racial equity, social justice, and inclusion comprise one of the three overarching objectives of Thrive Montgomery 2050.
3.	Wish for an equitable and just future.	I wish to live in a future where people of different races, backgrounds, and incomes can live together, when it is not a threat to see black people in a white neighborhood.	Avery Smedley, Silver Spring	Comment noted. The tenets of racial equity, social justice, and inclusion comprise one of the three overarching objectives of Thrive Montgomery 2050.
4.	Racially motivated planning and real estate practices.	<i>The Plan is cavalier in its depiction of restrictions and is an incomplete story. My community has not had restrictive covenants since the 1960's. In fact, it has organically grown diverse over the years. I also find it curious that the Planning Staff refers to racism and zoning at this time, when earlier, they consciously overlooked an African American cemetery buried</i>	Patricia Depuy Johnson	The history of public and private discrimination in planning and real estate in the county is complex and needs further investigation. Thrive Montgomery 2050 recognizes the role of county's plans and policies in creating and perpetuating racial inequity in Montgomery County.

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		<i>beneath cement in their haste to give developers one more piece of property to build on.</i>		
5.	Can land use plans change racism, segregation, and lack of inclusion?	<i>I'm sorry that many people have suffered from racism, segregation, and lack of inclusion. But plans cannot change these problems. These are matters of the heart of individual residents. I hope residents can work together to make real changes using love and respect of other and look forward—our community looks forward to continuing to serve others in our community.</i>	Quentin Remein, Cloverly Civic Association	It is well established in planning and equity related literature the role public land use plans and policies have played in creating and perpetuating racial inequity the country. Like many places in the country, Montgomery County has a long history of land use decisions that created exclusionary neighborhoods and formed barriers to resources and opportunities for people of color and other disadvantaged persons. As a land use planning agency, M-NCPPC recognizes the role it must play in dismantling that segregation and supplementing the good work that communities are doing to change people's hearts as well.
6.	Equity, density and auto travel.	<i>Over the years we have made strides in equity, but we have a long way to go, especially in providing equal and high quality education for all county students. But improving equity, which we must do, does not require increasing density in single family neighborhoods and forcing people to use less convenient modes of transportation to get to where they need to go.</i>	Robert Oshel, Silver Spring	The Plan envisions a multi-faceted approach to improving equity. It recommends using newly developed equity analysis tools to look at barriers and access to many things including affordable housing, education, jobs, transit, parks, public services just to name a few. The Plan does not propose to force residents to live or travel in a particular way. Instead, it is about providing more choices and opportunities for a wider

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				range of people to access housing, jobs, and services.
7.	Diversity--the government should not tell people where they should live.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	The draft Plan's vision and goals are about providing more choices and equitable opportunities for all residents to access a variety of housing types, jobs, and services in different areas of the county. The goal is to mitigate the effects of past policies that have led to today's segregated neighborhoods. More diverse neighborhoods will prevent the concentration of poverty in certain parts of the county.
8.	Not clear how the draft Plan addresses equity in housing, transportation, education, access to public spaces.	<i>Equity – in housing, transportation, education, access to public spaces both built and green – is a very important issue for our County, but in many specific areas, it's unclear how this plan provides that for all residents of our Montgomery County community.</i>	Phyllis Edelman	Comment noted. Equity is one of the key pillars of Thrive Montgomery 2050. One of the key outcomes of the plan is the development of Equity Focus Areas, an analytical tool designed to help planners better identify barriers and recommend strategies to improve access to affordable housing, jobs, transit, education, and parks, to name a few.
9.	Include metrics to measure how we have improved	<i>Equity : get baselines so we can measure how much we've improved, and gauge the difference between perceived disparities and structural ones. Remember there is a critical difference between "equal" (nominally the same) and "equitable" (proportionate). Remember there may be differences in the way a need must be satisfied, based on those being served. Use qualitative parameters and feedback, not</i>	Edmund Morris	Staff agrees there is an important distinction between being equal and equitable and these terms are often conflated. Metrics to access how new initiatives will meet our goals, and analyze our progress in achieving our equity goals, will be included in the revised draft.

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		<i>just quantitative service metrics, in evaluation.</i>		
10.	Ensure network connectivity as an infrastructure priority.	<i>One key element that needs to be highlighted over and over again is the need to ensure network connectivity as an infrastructure priority. Digital communications are great, but if there is not widespread access, it becomes a driver of inequity. Information access is the most critical element of our modern society, and is becoming more so. Ensuring every resident can actually access the internet regardless of where they are in the county should be a consideration.</i>	Edmund Morris	The Plan’s goal of using technological innovation to increase community connectedness for all residents includes specific policies and actions addressing equitably distributing new and existing communication and information technology to better connect areas of the county that have limited access. Policies also address meeting the diverse technology needs of people in typically disconnected groups such as seniors, lower-income households, people with disabilities and people with cultural and/or language barriers.
11.	Inclusive. “Various housing types at a mix of price points in Complete Communities and along rail and BRT corridors accommodate diverse populations and help achieve equity and integration on a neighborhood scale. Residents have a say in how their neighborhoods look and feel. Planners engage everyone in decision making about the future of their communities.” (P. 47)	<i>WMCCA Comment: While it sounds nice to imagine that planners will engage everyone in the decision making, our experience is that sometimes this engagement is merely to check off the box of public input. In recent years, residents have their say and then planners do what they want, sometimes seeming to favoring development interests over the interests of residents. If this plan wants to give residents a say, then we suggest that residents, not the Planning Board, be allowed to vote on decisions in their communities. Alternatively, there could be equal numbers of Planning Board members</i>	Kenneth Bawer for West Montgomery County Citizens Association	Comment noted. The draft Plan recognizes the importance of making government planning and decision-making processes accessible, transparent, and easy for everyone to participate in and understand. Several policies and actions in the draft Plan aim to strengthen our community engagement efforts to build relationships and foster trust in the planning process.

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		<i>and voting representatives from communities for each project.</i>		
12.	Inclusive Residents have a say in how their neighborhoods look and feel. (P. 47)	<i>While this is true, residents having the loudest voice in how their neighborhoods look and feel is what led to segregation and our housing shortage. Thrive needs to grapple with how to take residents' concerns into consideration while also ensuring broader public involvement and pursuing the greater public good.</i>	Jane Lyons for Coalition for Smarter Growth	The plan recognizes the importance of equitable community engagement and includes the goal to build civic capacity within communities and make government planning and decision-making processes accessible, transparent, and easy for everyone to participate in and understand. Several policies and actions in the draft Plan aim to strengthen our community engagement efforts including developing strategies and tools to meet people where they are, improving engagement of diverse participants who are often underrepresented in civic life, and building relationships and fostering trust with community leaders.
13.	Include equitable food system support strategies	<i>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.</i>	Catherine Nardi and Heather Bruskin for MC Food Council	Staff concurs. Under the draft Plan's goal for equitable community engagement, several policies and actions specifically aim to strengthen our community engagement efforts to improve outreach to diverse participants who are often underrepresented in civic life and to build relationships and foster trust with community leaders.

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14.	Physical or cultural displacement to existing vulnerable communities	<i>Something not included at all is a commitment by the county to ensure development does not cause physical or cultural displacement to existing vulnerable communities. That is something the county has worked on and should make an explicit commitment to, through proactive engagement with community leaders from the start of the process and prioritizing BRT, making cycling and walking safer, and investing in housing preservation alongside housing growth. Inclusiveness is critical to future affordability and should be central to Thrive.</i>	Katherine Lucas McKay	<p>The Affordability and Attainability chapter includes Goal 5.5 to minimize displacement of people, especially among low-income residents, people of color, people with disabilities and older adults. Several policies specifically address displacement including developing targeted, balanced, priority-based strategies that minimize displacement and monitoring neighborhood change and establishing programs to minimize the involuntary displacement of existing residents.</p> <p>Additionally, Goal 2.5 under “Connectedness” calls for assessing racial equity and social justice impacts across all Montgomery Parks and Montgomery Planning initiatives including a policy to use current best practices to analyze adverse impacts on the community, strengthening partnerships with stakeholders. Proactive engagement with community leaders is addressed in Policy 2.2.1 to build relationships and foster trust with community leaders to regularly engage community members, even when master plans or projects are not underway in their neighborhoods.</p> <p>In Action 2.2.2.c, Montgomery Parks and Planning staff will receive racial</p>

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				equity, social justice, and cultural competency training to ensure the departments effectively engage residents from diverse communities, especially historically marginalized and immigrant residents.
15.	Create more public spaces.	<i>We encourage you to include goals, policies, and actions to actively pursue creating more public spaces, especially public meeting and event spaces. Additionally, we urge you to include actions for creating shared identity through signage, wayfinding, and other public communications, including to reflect the diversity of languages spoken in Montgomery County.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted.
16.	<p>Goal 2.1: Create strong neighborhoods and communities that foster communication and interaction among residents and create a culture of inclusion. (P. 60)</p> <p>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. (P. 62)</p>	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Comment noted. The plan recognizes that communities and neighborhoods come in all shapes, sizes, densities. Many rural parts of the county identify themselves as communities even if they do not have town centers.

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17.	“Goal 2.2: Build civic capacity within communities and make government planning and decision-making processes accessible, transparent, and easy for everyone to participate in and understand.” (P. 61)	<i>This is critical, but has to be done in a way that reaches people who aren’t already in the room. An interesting gauge of current reach would be to map out the home addresses of everyone who testifies or submits testimony on the THRIVE draft plan.</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Staff agrees that equitable community engagement is critical. Several policies and actions under this goal specifically strengthen our community engagement efforts to improve outreach to diverse participants including renters, people with disabilities, people of color, people experiencing language barriers, and others who are underrepresented in civic life. These comments will be considered to inform revisions and reorganization of the draft Plan.
18.	Add a new action.	<i>Policy 2.2.2 - Actions should be more concrete and specific. Add: “Outreach to groups that are underrepresented in traditional planning meetings by collecting opinions at gathering points such as bus stops.”</i>	Benjamin Ross	These comments will be considered to inform revisions and reorganization of the draft Plan.
19.	Charrettes and citizen assemblies.	<i>Page 61. 2.2 Add Incorporate charrettes and Citizen Assemblies into design and planning processes</i>	Herb Simmens	These comments will be considered to inform revisions and reorganization of the draft Plan.
20.	Goal 2.4: Use technological innovation to increase community connectedness and resilience for all residents.	<i>Goal 2.4. Modify to say it is accomplished outside the master plan and development review process.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
21.	Include health impacts of technology.	<i>Page 63. 2.4 Health impacts of technology should be included in any discussion of technology.</i>	Herb Simmens	These comments will be considered to inform revisions and reorganization of the draft Plan.
22.	Goal 2.5: Assess racial equity and social justice impacts across all Montgomery parks and Montgomery Planning initiatives.	<i>Goal 2.5 Move to the equity element.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.

Resilient Economy

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1.	Wage and employment growth should have equal priority with the other goals of this Plan.	<i>The discussion on page 5 of stagnant wages is the only reference in this Introduction to the Diverse Economy goals and policies addressed later in the document. This section should discuss in greater detail the Diverse Economy goals and policies to clearly establish that wage and employment growth have equal priority with the other goals of this Plan.</i>	County Executive, 8-14-20 (This comment was made on the 6-11-20 draft of Vision, Goals, Policies and Actions)	These comments will be considered to inform revisions and reorganization of the draft Plan.
2.	Name of the Chapter	<i>Change the name to “Strong Economy”. Strong is substantially different than resilient and that is what we need.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
3.	Include the economic contribution of agriculture.	<i>In the Resilient Economy chapter, Planning [MDP] recommends that the economic contribution of agriculture be included.</i>	MDP	As it stands, agriculture accounts for 0.1% of our Gross County Product, which is the lowest of the County’s 20 two-digit employment sectors. Additionally, only 0.2% of our private establishments are in the agricultural sector, as well as 0.2% of employment and 0.1% of total wages. Agriculture has the potential to be a larger part of the County’s economy, and the Diverse and Adaptable Growth section of the draft Plan discusses some strategies meant to increase this contribution.
4.	Focus on small businesses.	<i>Economic Health: the age of having enough major employers to spread around is ending; consolidation in the most durable industries is eroding the ability of smaller players to expand. Focus less on attracting whales and more on nourishing minnows</i>	Edmund Morris	Comments noted. These comments will be considered to inform revisions and reorganization of the draft Plan. Staff notes, however, that planning’s ability to influence entrepreneurship has traditionally been limited.

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		<i>and trout. Being a diverse, vibrant place where people want to live will take care of enticing the big companies. Everyone else actually needs the investment.</i>		
5.	Relationship between growth and resilient economy.	<i>I cannot separate these two elements [Adaptable growth and Resilient Economy] as cleanly as the draft plan does, because they are intrinsically intertwined in a way many of the other elements are not (quite). The popular notion that growth drives economic success misses the fact that growth is also a product of the success, and that courting businesses is less important than creating spaces in which people with options want to live - and in which everyone who lives feels like they have opportunity . Thus investing in artisanship, freelancers, pop-up retail, mobile service (including food trucks and the like) and building institutional architecture that allows for diversity of uses (and information architecture that allows for diversity of income).</i>	Edmund Morris	Comment noted. Many of the activities brought up here are addressed throughout the Plan—as is the idea of creating more flexible types of land uses to allow for these activities.
6.	Prioritize economic health.	<i>it is clear that there is an understanding that economic health and economic disruption need to be drivers to effect change. The Plan identifies many issues and challenges that should be solved over the years. We submit that without the influx of private economic investment and public investment in infrastructure, the County will not be able to fully solve and address</i>	Stacy Silber	Staff concurs. Economic Health is one of the three main outcomes of thrive Montgomery 2050.

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		<i>these issues. As such, the Thrive Plan must prioritize economic health for such will serve as a catalyst for attracting investment and in turn provide the necessary ingredients for the County to achieve its other goals of environmental resilience and community equity.</i>		
7.	Hierarchy of priorities.	<p><i>With construction costs continuing to rise and rents remaining flat, developers and investors no longer just evaluate whether to invest in Montgomery, Fairfax or DC. Rather, they consider places like Charlotte and Atlanta that also have great needs for housing and the policies in place to attract businesses.</i></p> <p><i>Thus, to ensure economic investment in the County, the Plan needs to set a hierarchy of priorities so that Policies, which encourage investment in housing and commercial growth, are not inadvertently negated by other costly Policies and Actions that act as deterrents. To that end, certain Policies and/or Actions may need to be removed.</i></p>	Stacy Silber	We understand that there will be tension between some policies and actions in the draft Plan. These tensions will be addressed in specific master and site plans to allow for flexibility and changing priorities over the next 30 years.
8.	Food Economy	<i>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:</i>	Catherine Nardi and Heather Bruskin for MC Food Council	<p>Action 7.4.2.b of the draft Plan discusses encouraging agricultural processing and support facilities.</p> <p>These comments will be considered to inform revisions and reorganization of the draft Plan. Staff notes, however, that procurement and food literacy are worthy goals</p>

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		<ul style="list-style-type: none"> ● <i>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.</i> ● <i>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.</i> ● <i>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.</i> 		but may be outside the scope of the General Plan.
9.	Freight transportation needs.	<i>Page 69 (Refer to Action 3.4.1.a): Planning [MDP] suggests that the county coordinate with the Maryland Department of Transportation in the county-wide freight</i>	MDP	Comment noted.

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		<i>plan development process. The need for freight truck parking as it relates to I-270 and I-495 should also be addressed.</i>		
10.	Commuter/express bus.	<i>Page 70 (Refer to Action 3.7.1.b): The county may want to add “commuter/express bus” to the action statement [see the comment above re: Page 75 (Goal 4.1)].</i>	MDP	These comments will be considered to inform revisions and reorganization of the draft Plan.
11.	Better transportation for economic development.	<i>With respect to housing and economic development the plan takes the position that if affordable housing is available then business will come to Montgomery County. The County most certainly needs affordable housing, but insofar as attracting business is concerned and insofar as employment is concerned transportation is far and away the most important consideration. Finish the purple line and radically improve bus service, thereby improving access to jobs and correspondingly, improved income.</i>	Harold Pfohl, Sumner Village	The draft Plan takes the position that affordable housing and better transportation and access to jobs are equally important to—and necessary for—economic development. These comments will be considered to inform revisions and reorganization of the draft Plan.
12.	Lack of a comprehensive economic strategy.	<i>There are four cornerstones to strategy: people, assets, time, and money. The County is suffering severe revenue shortfall as a result of the economic collapse due to Covid 19. Additionally there has been virtually no net new business formation over the past decade and hence very little increase in public revenue from business and little in the way of new job opportunities. The plan ignores the costs and at the end states that this will be dealt with on an individual project basis, and secondly that new resources and new solutions will be found.</i>	Harold Pfohl, Sumner Village	Public and private development projects are funded and financed in many ways, depending on the nature and timing of the project. While the County—like all state and local governments—is currently facing a tight budget due to the pandemic, its fiscal situation will fluctuate through good and bad times over the next thirty years. The draft Plan lays out a vision and aspirations for the County. If funds

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				are not available, some parts of the vision may be delayed or updated to meet the changing circumstances.
13.	Possibility of significant increase in population with no meaningful increase in employment/business.	<i>The authors posit that Thrive Montgomery 2050 is a necessary plan to deal with the unprecedented uncertainties we face. If so, where is the section dealing with the possibility of significant increase in population with no meaningful increase in employment/business? With long term diminished revenue? Proceeding with the assumption that uncertainties are limited to whether conditions will improve greatly, or moderately ignores the possibility that things will get worse. If the plan must be adopted now, then the plan must consider how to proceed if negative conditions are prolonged.</i>	Harold Pfohl, Sumner Village	The draft Plan has not made assumptions about how employment growth will proceed, and it is not possible to forecast—let alone plan for—every potential scenario. The draft Plan presents a general strategy for encouraging employment growth that can be applicable in time of both growth and stagnation, and that can be adjusted if needed.
14.	Support for small businesses.	<i>This chapter needs more about protecting and encouraging small businesses, as well as allowing and supporting neighborhood retail.</i>	Jane Lyons for Coalition for Smarter Growth	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
15.	Support for small businesses.	<i>In order for small business to Thrive, and boost the economic development of our County's communities, it is pertinent that some reigns be put on commercial property management to allow or incentivize creative use of their spaces, and help bolster community engagement.</i>	Charisse Callender-Scott	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
16.	More jobs in the Upcounty.	<i>One major solution for the housing / transportation / jobs conundrum that exists County-wide is to bring more jobs to the Upcounty. If we had more jobs in Germantown, we would have much shorter</i>	Marilyn Balcombe for Germantown Chamber of Commerce	Increasing employment growth in a compact form in existing employment centers in the Upcounty region is consistent with the goals of Thrive Montgomery 2050.

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		<i>commute times, less traffic congestion, and much less greenhouse gas emissions. I don't necessarily agree with the idea that "Priority should be given to placing jobs, schools, and retail within walking distance to homes" (p.35), but increasing jobs in the Upcounty will certainly put jobs closer to a large employment base.</i>		
17.	Low job growth rate and looming revenue deficits.	<i>Finally, we note that the draft Plan assumes that "If you build it, they will come." This assumption won't work, however, unless a significant number of new jobs are created. In view of its staggering costs, which businesses would not want to absorb, there is a significant likelihood that this plan will exacerbate Montgomery County's failures in job growth. This County, with its low job growth rate and looming revenue deficits, needs to focus on incentives and incubator policies that will bring industry and business to the County. Fill those empty office buildings with businesses and startups.</i>	Citizens Coordinating Committee on Friendship Heights	Staff Concurs that the county's job growth in the past few years has been sluggish. Improving the county's economic resilience and competitiveness is one the three major goals and outcomes of Thrive Montgomery 2050.
18.	Economic development in or near communities.	<i>Economic development is barely addressed, particularly as it can improve and diversify communities. Although the draft plan speaks of minimizing the "negative externalities" of land development, it ignores the issue of locating beneficial economic development in or near communities that may be less attractive initially, but whose appeal can be improved with incentives.</i>	Naomi Spinrad, Chevy Chase West	Creating incentives to spur development in specific areas would be consistent with the goals of Thrive Montgomery 2050, and could be achieved through master plans or county legislation.

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19.	Prioritize equity and environmental sustainability over economic growth.	<i>Too often, economic growth is given priority above all else. Equity and environmental sustainability should be more important objectives than economic growth.</i>	Ethan Goffman, Rockville	Economic growth, equity and environmental sustainability are three major goals of Thrive Montgomery 2050. The draft Plan strives to achieve a balance among these three outcomes.
20.	Bring quality jobs to the East County	<i>The county should strive to bring quality jobs to east county, to help end the east-west imbalance in jobs and housing.</i>	Ethan Goffman, Rockville	The Plan prioritizes employment growth in existing employment centers. While these centers are not specifically defined in the draft Plan, they include places in East County such as Silver Spring, Wheaton, and White Oak. This strategy is paired with the strategy of prioritizing access to jobs through improved transit for residents of the eastern half of the county.
21.	Prioritize Economic Growth	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Economic Health is one of the Three overarching outcomes of the draft Plan (p. 36).
22.	Need for a more comprehensive economic strategy.	The county should look at market-oriented approaches to solve our problems, and the plan must explicitly recognize the role of redevelopment and achieving our environmental and equity goals in addition to improving our economic competitiveness.	Tricia Swanson, Montgomery County Chamber of Commerce	Staff concurs with statements about redevelopment and retaining talent by creating livable places. Staff also agrees that County agriculture could be more local serving. The Ag Reserve is addressed

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		<p>The Chamber Board members’ greatest concern was accessing and retaining top talent, and this plan must create places where talent wants to live. This plan is not a one-size-fits-all solution and must be implemented differently in different places, but all need investments.</p> <p>A stronger economic vision of the Ag Reserve is needed, we must preserve the economic vitality of farming while also shaping it to serve our entire county.</p>		in detail in Chapter 7 of the draft Plan.
23.	Equitable economic growth in all parts of the county.	<i>The County has not done a good job of dispersing economic equity throughout the County and has not given every part of the County equitable economic opportunities for all residents and families, parents, and children.</i>	Bernadine Karns, Acting President, Calverton Citizen Association	Staff concurs.
24.	Emphasis on upcounty commercial development.	<i>A second highlight the Thrive Montgomery 2050 Plan is short on is the emphasis of Up-County Commercial development of the technology sector, long envisioned by many previous administrations. It is vital to the Up-County tax base and the livelihood of our well-educated citizenry to bring technology, including biotech, from Rockville, all the way to Frederick, particularly in the much needed Germantown, MD area. By emphasizing an expansion of the tax base through Commercial enterprise, more and more of Montgomery's publicly-educated finest can take advantage of the quality of life</i>	M. Allen	Encouraging employment growth in existing Upcounty employment centers, in a compact form, is consistent with the goals of Thrive Montgomery 2050. However, no specific employment centers are being prioritized over any others. Planning supports the Montgomery County Economic Development Corporation in their efforts to recruit specific sectors, such as Technology, to the County (see Policy 3.1.1 of the Public Hearing Draft).

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		<i>that has sustained this region for decades. Commercial development in the tech sector should be a primary plank in the vision for Thrive Montgomery 2050.</i>		
25.	Need for a better economic strategy.	<i>The Plan is also fatally flawed without a county wide effort to generate new jobs. To pass this plan without an economic or employment blueprint, that is realistic, during this time of severe budgetary deficits, is not in the best interests of its citizens.</i>	Patricia Depuy Johnson	Job growth is major concern and a goal of Thrive Montgomery 2050. (See Goal 3.3. and its related policies and actions. “Goal 3.3: Increase the number of well-paying jobs for all education and levels. Encourage the expansion of job training and other professional development opportunities to encourage economic mobility.”) While the County—like all state and local governments—is currently facing a tight budget due to the pandemic, its fiscal situation will fluctuate through good and bad times over the thirty-year timeframe of Thrive Montgomery.
26.	“The county retains and attracts large companies, small businesses, and high quality educational institutions.” (P. 47)	<i>WMCCA Comment: Add to this: “...only insofar as they do not negatively impact our goal of environmental sustainability and improved quality of life. This includes having no negative impact on our natural areas, including streams. We will not sacrifice water and air quality, overcrowding of roads and schools, or other indicators of quality of life simply to add jobs.</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs that all growth should be socially and environmentally sustainable. Sustainability is emphasized throughout the draft Plan.
27.	Issues, first paragraph: ...Slow job growth, limited new business formation, wage stagnation, rising	<i>The sentence in the middle of the first issues paragraph needs to be rewritten since it indicates that causes and effects are</i>	Dan Wilhelm for Greater	These comments will be considered to inform revisions and reorganization of the draft plan.

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	economic and social inequity, a high cost of living and doing business, and increasing traffic congestion negatively affect economic activity. ...	<i>the same. 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."</i>	Colesville Civic Association	
28.	All Goals and Policies in the economy chapter.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	While the Planning Department does not control the wages paid by employers, the Plan seeks to create conditions that would attract employers and jobs that pay better wages.
29.	Reduce the cost of Building in the county.	<i>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:</i> <ul style="list-style-type: none"> • <i>Elimination of the school moratorium</i> • <i>Reducing school impact taxes</i> • <i>Exempting some properties from both transportation and school impact taxes.</i> <i>The opportunity zone is the most important since federal incentives are provided. The enterprise zone is another vehicle for economically encouraging growth.</i>	Dan Wilhelm for Greater Colesville Civic Association	The moratorium and impact taxes have been addressed in the recently updated County's Growth and Infrastructure Policy. Enterprise Zones and Opportunity Zones will be used in ways consistent with the goals of Thrive Montgomery 2050.

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30.	Protections against displacement for renters and businesses.	With all these new developments in the area, my fear is that businesses and residents will be displaced due to higher rents. I want to see more protections for renters and businesses to regulate how much owners can charge their tenants.	Danny Chu	These comments will be considered to inform revisions and reorganization of the draft Plan.
31.	Focus on East County.	Number 10 under trends and challenges suggests we need to look for regional solutions. We must consider how to take advantage of our proximity to economic opportunities in neighboring jurisdictions: job centers colleges and universities, and cultural and recreational attractions. There has been little coordination in the past to promote these connections until the development in White Oak. More attention needs to be given to East County and strategies to enhance development there.	Seth Grimes, Takoma Park Resident, Former City Councilmember	The Resilient Economy chapter contains several policies supporting regional connection and economic development in the East County. For example, policy 3.3.4 calls for the creation of new educational and workforce development opportunities in the East County.
32.	...increasing traffic congestion negatively affect economic activity. (P. 65)	<i>We urge you to change this to "...high travel times negatively affect economic activity." Traffic congestion does not necessarily correspond with high travel times, given destinations are located in relatively close proximity. In fact, traffic congestion in walkable urban places is actually a reflection of a successful, vibrant urban economy.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered to inform revisions and reorganization of the draft Plan.
33.	Page 66, Diversity. Montgomery County already has several competitive industries such as biotechnology and the federal government, but it must cultivate new ones to ensure that its portfolio remains competitive.	<i>We disagree with this approach to economic development. The county's energy is better spent cultivating existing major industries and closely related industries, rather than trying to cultivate new industries. The positive spillover effect</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>of having several large successful industries will result in a more diversified economy.</i>		
34.	Connectedness (P. 66-67)	<i>This section should make the argument that urbanism and a high-quality transportation system results in improved “connectedness” or agglomeration economies.</i>	Jane Lyons for Coalition for Smarter Growth	These comments will be considered to inform revisions and reorganization of the draft Plan.
35.	Policy 2.1.3: Design public infrastructure (e.g., streets, pathways, and trails) such that social gathering, recreation, and active living are major priorities. Use public art, seating, historic preservation and other placemaking techniques to create distinctive community-based places. Make these spaces safe, attractive, informative, convenient, and easy to access for all ages and abilities. Promote active lifestyles and social interaction among diverse community members.	<i>[Re:] Goal 2.1.3. 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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff concurs.
36.	Proposed new policy to tax new businesses.	<i>WMCCA Comment: New Policy: Such efforts will not include the use of subsidies in the form, for example, of tax breaks such as multi-year tax abatements. Tax-payer subsidies of large corporations will no longer be tolerated - these enterprises need to pay their own way and not be subsidized by taxpayers. In addition, new business development will not get ahead of infrastructure and public services. New businesses will contribute funds to the roads, sidewalks, schools, fire departments, community centers, parks, etc., required to</i>	Kenneth Bawer for West Montgomery County Citizens Association	Tax policies, including tax abatements for businesses, are set by the County and State executive and legislative branches. The new Growth and Infrastructure Policy addresses development and infrastructure staging.

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		<i>support the needs of the new residents that they employ.</i>		
37.	Proposed new policy to eliminate tax breaks for commercial projects.	<i>WMCCA Comment: New Policy: The County will not use tax breaks (e.g., payment in lieu of taxes, property tax exemptions, etc.) for any commercial development projects. Development must proceed on its own merits with any risks shouldered by commercial enterprises, not the public. Tax concessions to sports arenas, for example, have been shown to not return the public's initial "investment".</i>	Kenneth Bawer for West Montgomery County Citizens Association	Tax policies, including tax abatements for businesses are set by the County and State executive and legislative branches.
38.	Employment and Complete Communities.	<i>Page 68. 3.2 These commercial centers are not mentioned in the discussion of complete communities. Are they separate from Complete Communities, included within their boundaries, overlapping or what? Much more attention and clarity are required regarding the location and special characteristics of expected future employment.</i>	Herb Simmens	Comment noted. These comments will be considered to inform revisions and reorganization of the draft Plan.
39.	Policy 3.2.1: Encourage high densities, a compact form of development, a diverse range of activities and urban amenities in existing and emerging commercial centers located near transit to increase economic competitiveness.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	Comment noted. While zoning density may increase land value, it may also make each individual unit less marginally expensive to build (and in turn rent or purchase). The draft Plan still allows for density bonuses.
40.	Action 3.2.1.a: Study potential land value capture strategies including a differential tax or split-rate property tax—where land is taxed at a higher rate	<i>Action 3.2.1.a. We don't agree with this proposed action.</i>	Kenneth Bawer for West Montgomery	Comment noted.

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	than improvements—to return publicly-created land value to the public, to encourage dense development of existing commercial centers and to discourage vacant and underutilized properties.		County Citizens Association	
41.	Policy 3.2.2: Improve transportation connections between existing commercial and employment centers and transit hubs to connect Montgomery County businesses to workers and the rest of the region, nation, and world.	<i>Policy 3.2.2 Move this to the transportation element. What about other major employment centers, including White Oak?</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
42.	Action 3.2.2.a	<i>WMCCA Comment: Use less jargon. Aren't taxis a one-seat transit service?</i>	Kenneth Bawer for West Montgomery County Citizens Association	"Transit" in the draft Plan (as well as in planning literature) means public transit that provides mass transportation. Taxis are not considered public transit.
43.	3.2.2 a. Establish a one-seat transit service from major employment centers to at least one of the three international airports in the region (Baltimore- Washington International, Dulles International, or Reagan National Airport). (P. 69).	<i>This recommendation flies in the face of the county's commitment to eliminating 80% of GHG's by 2027. We need to be thinking about phasing out airports over the next 30 years, not increasing access to them.</i>	Herb Simmens	Comment noted.
44.		<i>Action 3.2.2b - Add White Flint.</i>	Benjamin Ross	The list is not comprehensive. These comments will be considered to inform revisions and reorganization of the draft Plan.
45.	Germantown and I-270 corridor.	<i>Goal 3.2/ Policy 3.2.2 / Action 3.2.2.b: Both Germantown and the I-270 Corridor were envisioned to be major employment centers and should continue to be included as such. While it's great to have the Great Seneca Science Corridor included, but that does not</i>	Marilyn Balcombe for Germantown Chamber of Commerce	The list is not comprehensive. These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>capture the biotech expansion along the entire I270 corridor.</i>		
46.	Goal 3.3.: Increase the number of well-paying jobs for all education and skill levels. Encourage the expansion of job training and other professional development opportunities to encourage economic mobility.	<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.</i>	Dan Wilhelm for Greater Colesville Civic Association	These comments will be considered to inform revisions and reorganization of the draft Plan.
47.	Policy 3.3.1: Prioritize job access and job generation in land use planning, including development review processes, master planning and functional plans.	<i>WMCCA Comment: No! Prioritize sustainability (e.g. carbon footprint neutrality), quality of life for existing residents, and protection/enhancement of the natural environment in land use planning, including development review processes, master planning and functional plans.</i>	Kenneth Bawer for West Montgomery County Citizens Association	The priorities of social and environmental sustainability are noted throughout other sections of the draft Plan and still apply to land use planning.
48.	Action 3.3.1.a: Complete an Employment Growth and Access Functional Plan to determine if and where land use policies limit growth of and access to a variety of job types. Recommend strategies for addressing these limits.	<i>WMCCA Comment: Change to say, "Complete an Employment Growth and Access Functional Plan to determine if and where land use policies limit growth of and access to a variety of job types. Recommend strategies for addressing these limits only if they can be accomplished while maintaining sustainability (e.g. with a neutral carbon footprint), quality of life for existing</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs that development from employment growth should be sustainable, and sustainability is emphasized in other areas of the draft Plan.

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		<i>residents, and the protection/enhancement of the natural environment.”</i>		
49.	Goal 3.4: Preserve land for Production, Distribution, and Repair (PDR) activities that provide well-paying jobs to those without advanced degrees, provide essential goods and services, and propel economic competitiveness for the county.	<i>Goal 3.4. This goal should be deleted since land is needed for all enterprise activities, not just PDR.</i>	Dan Wilhelm for Greater Colesville Civic Association	PDR businesses need special preservation policies because their land is especially vulnerable to conversion to higher-valued land uses such as office and retail. The same is not true of existing office or retail space which is generally not under threat of being converted to other uses.
50.	Need land for production distribution and repair businesses.	The county should reconsider reserving land for production distribution and repair. This keeps land cheaper for those favored land uses. Those uses could include manufacturing, but it will most likely be warehouses, serve and delivery, and big box retail. Businesses like Amazon should not have preferential access to land. Small businesses have enough difficulty competing without the challenge of land use regulation.	Salim Furth, Takoma Park	Goal 3.4 of the Public Hearing Draft states, “Preserve land for Production, Distribution, and Repair (PDR) activities that provide well-paying jobs to those without advanced degrees, provide essential goods and services, and propel economic competitiveness for the county.” PDR businesses comes in a wide range of sizes and provide both jobs and services to the county, which is why Thrive Montgomery recognizes the importance of maintaining PDR use given demands to convert this land to other uses.
51.	“Action 3.4.1.a: Create a county-wide freight plan in partnership with MCDOT to ensure the efficient movement of goods over road, rail and water while eliminating environmental and equity impacts associated with freight logistics.”	<i>Action 3.4.1a - Minimize impacts rather than eliminate. Elimination is not feasible and setting it as a goal will impede location of needed industrial sites.</i>	Benjamin Ross	These comments will be considered to inform revisions and reorganization of the draft Plan.

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52.	“Action 3.4.1.b: Develop an urban logistics strategy to ensure that the increasing volume of e-commerce-related deliveries are accommodated without disrupting quality of life.”	<i>Page 70. 3.4.1.b Include electric and conventional cargo bicycles as an integral part of any freight mobility plan</i>	Herb Simmens	Comment noted. This issue can be addressed when the freight plan is conducted.
53.	“Goal 3.5: Lead nationally in innovation and entrepreneurship, building on existing assets and enhancing job and business growth for industries in which Montgomery County has a competitive advantage.”	<i>WMCCA Comment: Add this language: This enhanced job and business growth must only be pursued on a sustainable basis, i.e., only if it can be attained without negatively impacting quality of life (e.g., air quality, traffic, happiness (ratings) and environmental quality of our natural areas (e.g., no stormwater or other water quality impacts, no ecological degradation, etc.).</i>	Kenneth Bawer for West Montgomery County Citizens Association	Staff concurs that development from employment growth should be sustainable. Sustainability is emphasized in other areas of the draft Plan.
54.	Policy 3.5.3: Build connections between the private sector, the community, and higher education, and research organization, including the Universities at Shady Grove, Montgomery College, and the University of Maryland’s flagship campus in Prince George’s County, to enhance the innovation economy.	<i>Policy 3.5.3. Move into policy 3.3.</i>	Dan Wilhelm for Greater Colesville Civic Association	While the two policies mentioned both address higher education, Goal 3.3 has a narrower focus on workforce development, while Goal 3.5 is about making and enhancing institutional connections to encourage entrepreneurship and innovation. Both are equally important.
55.	“Goal 3.6: Identify and remove regulatory and other barriers to encourage real estate development and business establishment and expansion.”	<i>WMCCA Comment: This is a dog whistle for developers. We need regulations so that we don’t end looking like Tysons Corner. Add this language: These must only be removed if it can be proved that it can be done without negatively impacting quality of life (e.g., air quality, traffic, happiness rating) and</i>	Kenneth Bawer for West Montgomery County Citizens Association	These comments will be considered to inform revisions and reorganization of the draft Plan.

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		<i>environmental quality of our natural areas (e.g., no stormwater or other water quality impacts, no ecological degradation, etc.).</i>		
56.	<p>“Goal 3.6: Identify and remove regulatory and other barriers to encourage real estate development and business establishment and expansion.”</p> <p>“Policy 3.6.2: Encourage infill development by making the associated processes accessible to smaller or newer developers that want to take advantage of a diverse range of opportunities such as building Missing Middle Housing.”</p> <p>“Policy 3.6.3: Continue to use innovative technology to improve the development process internally and for the public, including routinely evaluating existing review software and updating to suit requirements and processes.”</p>	<p><i>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.</i></p> <ul style="list-style-type: none"> <i>A policy should be added to review regulations to eliminate unnecessary or outdated ones.</i> <i>Delete draft policies 3.6.2 (housing in the wrong element) and 3.6.3 (use technology – if anything this is an action).</i> 	Dan Wilhelm for Greater Colesville Civic Association	These suggestions are implied by the current language.
57.	“Goal 3.7: Play a prominent role in creating a culture of regionalism and in making the combined Baltimore-Washington region a global leader in economic innovation and sustainable development practices.”	<i>Goal 3.7. Need to also work with other counties, especially for transportation.</i>	Dan Wilhelm for Greater Colesville Civic Association	Staff concurs.
58.	Corner stores and other businesses in existing neighborhoods.	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	These types of decisions will be taken up in individual master plans during the implementation of Thrive Montgomery 2050.

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		<i>controlled? How will zoning be altered to allow these uses?</i>		
59.	Attract and retain jobs.	<i>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?</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Employers seek places with transportation and housing choices that are attractive to their employees. The draft Plan emphasizes creating more diverse and affordable housing, as well as a high-quality public transit system. In addition, Goal 3.6 states, “Identify and remove regulatory and other barriers to encourage real estate development and business establishment and expansion.” Some of the business climate issues are beyond the scope of this plan.
60.	Metrics to measure equity for minority businesses.	<i>What metrics and consequences will be put into place to ensure minority business owners have equitable access?</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	These metrics, as well as specific actions to preserve and expand minority-owned businesses, will be addressed in subsequent plans and initiatives specifically related to the issue.
61.	Incentives for specific industries.	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	Some of these industries have been and continue to be addressed. For example, see the Montgomery County Agritourism Study . The Montgomery County Economic Development Corporation and the County Executive Office lead the county’s industrial recruitment, business retention and expansion, and the encouragement of

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		<i>Administration), and green manufacturing (converting ‘strip malls’ and department stores to manufacturing centers).</i>		entrepreneurship. Policy 3.1.1 of the draft Plan reaffirms Planning’s role in supporting these agencies in their efforts.

Implementation

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		With slow job growth and reduced revenues project for many years to come, how will the county fund improvements and provide <i>reliable and efficient transit, schools, utilities, healthcare facilities, parks, libraries, athletic fields, and community centers among other facilities that would be necessary to support new “Complete Communities” featuring “Fifteen Minute Living.”</i> ... how the County will be able to afford retrofitting existing established neighborhoods with the infrastructure and amenities that they currently lack to turn them into “Complete Communities.”	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	
		Page 128 (Partnership for implementation): The Draft Plan should include “cities and municipalities in Montgomery County” in the list of the partnership entities. The Draft Plan may also include a brief discussion on the need for the interjurisdiction coordination to help with Plan implementation.	MDP	
		What are the expectations for “partners” in the implementation of Thrive Montgomery? We noticed that municipalities were not listed among the potential partners.	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	
		The following comments relate to the actions listed in the Implementation Guide published as a separate document:	MDP	

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		<ul style="list-style-type: none"> <i>o Page 5 (refer to 3.4.1.a) could include MDOT Agency Roles</i> <i>o Page 5 (Refer to Action 4.5.3.a): Could include ZEEVIC in Agency Roles.</i> <i>o Page 6 (Refer to Action 4.5.1.a): Could include BRTB in Agency Roles.</i> <i>o Page 7 (Refer to Action 6.2.2.a): Could include MDE in Agency Roles.</i> <i>o Page 7 (Refer to Action 6.5.2.a): Could include the Maryland Department of Natural Resources (DNR) in Agency Roles.</i> <i>o Page 8 (Refer to Action 6.5.2.d): Could include DNR in Agency Roles.</i> <i>o Page 7 (Refer to Action 6.2.2.b): Could include ZEEVIC in Agency Roles.</i> <i>o Page 11 (Refer to Action 4.8.2.a): Could include the Maryland CAV Working Group in Agency Roles.</i> 		
		<p><i>It should be noted that Montgomery County has a Sustainable Community Action Plan. As part of the Sustainable Community designation, quality of life, environment, economy, transportation, housing and local planning and land use are all subjects of the Action Plan. Planning [MDP] suggests the county review the Action Plan for consistency with the Draft Plan and consider if any of the actions support implementation of the Draft Plan.</i></p>	MDP	
		<p><i>Staff and commissioners have stated the plan will give them tools they do not now have – these tools need to be explicitly identified. For full transparency, the plan</i></p>	Naomi Spinrad, Chevy Chase West	

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		<i>should state clearly what additional tools are necessary and why, and how they will be used.</i>		
		<i>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.</i>	Andy O'Hare, President EBCA	
	Need for metrics to assess implantation and success of the Plan	<p><i>Because this plan is moving forward despite the fact that it is based on pre-Covid-19 data and assumptions, there must be a point early in the plan – at 3-5 years in – to reevaluate whether the underlying assumptions and policies flowing from them are still valid. The plan should include a section listing all the elements that might be affected and what adjustments might need to be made as a result of this reevaluation.</i></p> <p><i>As important, timelines and signposts need to be included for everything. How many additional housing units in how many years, located where. Priorities for transit routes, to be completed in what period. Eliminating food deserts, by what means, where, how soon. Restoration of tree canopy, by numbers of trees or acreage and locations as well as timing. And so on. Every metric allows for adjustment depending on success, so the measurement intervals must be clear.</i></p>	Naomi Spinrad, Chevy Chase West	
		Metrics and Implementation: We recommend that the plan incorporates	Denisse Guitarra	

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		clear and more specific metric requirements to ensure that the policies and actions stated in the plan are enforced.	for Audubon Naturalist Society, David Helms, Pedestrian, Bicycle, Transportation Safety Advisory Committee, Rachel Taylor, Katherine Lucas McKay, Silver Spring	
		<i>Create implementation metrics now: We should not wait until two years have passed after the completion of Thrive to establish metrics for measuring the plan's success. Our itemized comments below offer recommendations for high-level metrics.</i>	Jane Lyons for Coalition for Smarter Growth	
	Without economic analysis, it is difficult if not impossible to set priorities	<i>Metrics play a role as well in economic analysis. It is possible to estimate what creating a particular BRT route will cost given conditions along the route and the level of sophistication in the buses and service. Different types of housing can be costed out in different locations. Figures may vary depending on how quickly goals are to be achieved. But in the absence of metrics and economic analysis, we are provided with nothing more than a vision. And without metrics, the executive cannot do its required economic analysis. And without both metrics and economic</i>	Naomi Spinrad, Chevy Chase West	

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		<i>analysis, setting realistic priorities is impossible.</i>		
		<i>Statements in this section about specific decisions that may or not be made in the future don't belong here.</i>	Dan Wilhelm for Greater Colesville Civic Association	
	For example, implementing some of the transportation goals and policies may require the transfer of control of major roadways from the State Highway Administration (SHA) to Montgomery County to give the county more control over road design and function. (P. 126)	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	
	<ul style="list-style-type: none"> Connectedness Chapter Action 2.2.2b calls for the development of a civic engagement toolkit to guide the civic engagement plan for each master plan. Resilient Economy Action 3.3.2 calls for an update to the master planning process to include the development of employment objectives and the assessment of plan scenario employment impacts. Different areas of the county support different levels of employment, so the employment objectives will need to be considered specifically for each master plan. 	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	
	Tools to Implement the General Plan. (P. 128).	<i>The county's adequate public facilities ordinance, the Growth and Infrastructure Policy, should be listed here.</i>	Jane Lyons for Coalition for Smarter Growth	

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	Performance Measures. The Plan recommends developing baseline performance measures as a Montgomery Planning work program item within two years of Plan adoption. (P. 129-130)	<p><i>We strongly disagree with this. What gets measured gets done, and Montgomery County cannot wait for two years to get started on Thrive's implementation. Therefore, we encourage you to create baseline performance measures in the next draft of Thrive. In our testimony on the draft vision, goals, policies, and actions, we recommended emphasizing the following when selecting metrics:</i></p> <p><i>i. life outcomes of residents — the Montgomery of 2050 should not be a place where income, race, ethnicity, gender identity, or zip code are determinative of health, wealth, or educational outcomes;</i></p> <p><i>ii. vehicle miles traveled and average residential distance from high-frequency transit;</i></p> <p><i>iii. greenhouse gas and carbon emissions, by sector; and</i></p> <p><i>iv. integration — whether our neighborhoods and communities include residents of different incomes, races, ethnicities, ages, etc.</i></p>	Jane Lyons for Coalition for Smarter Growth	
	<p>Tools to implement the General Plan. (P. 126-127)</p> <p>Action examples: Additional data collection and studies.</p>	<i>Pages 126/127/132-134. These sections need to be deleted and placed in an appendix.</i>	Dan Wilhelm for Greater Colesville Civic Association	

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	Action examples: New plans, updates to existing plans and Zoning Ordinance Action examples: Creation of new tools and guidelines Action examples: New programs (P. 132-134)			
	Facilities plans: Thrive Montgomery 2050 includes guidance that applies specifically to the design, placement, and funding of public facilities. Future planning for public facilities, including county government facilities, park facilities, public schools, and Montgomery College, should reflect this guidance and direction in order to ensure they are compatible with and help implement the goals of Thrive Montgomery 2050.	<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	
	As a document whose primary function is to guide land use the draft Plan is very short on information about how to identify sites for parks and green space, schools, and other public facilities and services.	<i>Do you envision eliminating adequate public facilities requirements? If not, more attention must be paid in the plan to how to provide for these.</i>	Naomi Spinrad, Chevy Chase West	
		<i>The plan does not provide that the infrastructure enhancements are completed before the plan is enacted. Public transportation, adequate public facilities, and schools need to be in place before the plan is enacted. The Council recently approved legislation that allows new development to proceed without needed infrastructure improvements. We need this infrastructure to be completed first!</i>		

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		<i>How will the county pay for all of the elements of this plan and in particular the Complete Communities when estimates of lost revenue for the county have grown increasing larger as this year has progressed?</i>	Phyllis Edelman	
	Funding for schools	<i>First, having attended public schools in the County, I know that maintaining an excellent public school system is crucial to the ensuring that people can thrive in this County, and in the face of global competition. So, I applaud the plan for repeatedly emphasizing the need to facilitate access to schools at all levels. I might urge the County to ensure that funding goes to build as many schools as possible to avoid overcrowding and – given current trends – to take all relevant steps necessary to ensure students have access to computers and the Internet to be able to receive excellent education virtually.</i>	Alain Norman, Silver Spring	
		<i>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.</i>	Andy O'Hare, President EBCA	
	Specify Payment Plans for Public Facilities	<i>The Plan should address how the County will pay for decentralized public facilities.</i>	Todd Hoffman	

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		<i>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.</i>	for Coalition of Incorporated Municipalities and Community Organizations	
	Coordinate with School Facilities and Programs	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	
	Prioritize Equity	<i>Public facilities are not equitably distributed throughout the county. The draft Plan should prioritize adding missing public facilities to disadvantaged neighborhoods</i>	Todd Hoffman for Coalition of Incorporated Municipalities	

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		<p><i>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.</i></p>	<p>and Community Organizations</p>	
	<p>Coordinate with Police and Fire Protection Services</p>	<p><i>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</i></p>	<p>Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations</p>	

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		<i>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.</i>		
		<i>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.</i>	Dan Wilhelm for Greater Colesville Civic Association	
		It would be helpful to explain the evaluation process, albeit briefly, in the main document as well as having an extensive explanation in a separate document. The public needs to know how the county is tracking progress toward its goals and what the timetable is for evaluation.	League of Women Voters of Montgomery County	
	Use Master Plans and Sector Plans	<i>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</i>	Todd Hoffman, for Coalition of incorporated municipalities and community organizations	

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		<i>characteristics of the neighborhoods (see item 5 in the Complete Communities section).</i>		
	Move Design Excellence Criteria to Other Plans	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	
	Improve Implementation Timeline	<i>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.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	
		<i>The Plan should explain the impact its adoption will have on existing Master Plans and Sector Plans. Will recently adopted</i>		

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		<i>Master and Sector Plans be revised to reflect the Goals, Policies, and Action items in the Plan?</i>		
	Timeline	<i>Add a five-year checkup to review the impact of the pandemic on long term plans</i>	Jean Cavanaugh, Silver Spring resident	
	Fiscal Impacts/Tax Burdens	<i>The plan suggests increasing the recordation tax, something already included in the Growth Policy. It also recommends split-rate property taxes but does not explain whether or how that might affect owners of single-family properties if there is ultimately any rezoning of such properties. These and any other revenue-raising considerations need to be addressed.</i>	Naomi Spinrad, Chevy Chase West resident	
	Add Financing Strategies	<i>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</i>	Todd Hoffman for Coalition of Incorporated Municipalities and Community Organizations	
		The document does not include financing or a revenue model. I'd like to see a breakdown of our tax bases in the coming decades. Identify what will we promote, protect, or grow.	Peter Rizik	
	Share the Costs Between Developers & Residents	<i>The draft Plan should indicate how the costs of achieving the goals of the Plan will be shared between developers and residents.</i>	Todd Hoffman for Coalition of Incorporated Municipalities and	

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		<i>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.</i>	Community Organizations	
		Complete communities is an attractive idea but it is not feasible. Instead, planning should focus on reviewing development regulations to provide developers with certainty and clarity, the duration of the process, what is and isn't allowed, and all the monetary costs they should expect (like school impact fee schedules). Community input should be primarily at the planning phase, and not be required for projects that fit into planning vision for an area.	Salim Furth, Takoma Park	
		<i>Perhaps most significantly, the draft Plan fails to recognize that the County is suffering from severe constraints on its operating and capital budgets, likely for many years to come. According to the County Executive's office, a \$1 billion deficit in the County budget is projected by the end of the next six years. The County has also had sluggish job growth over the last 15 years, which has stood at 5% annually. By comparison, job growth in similar counties has grown by 21%. Maryland has lagged Virginia in job growth and as of early this year, Prince George's County</i>	Melanie Rose White, Chair Citizens Coordinating Committee on Friendship Heights	

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		<p><i>exceeded Montgomery County in job growth.</i></p> <p><i>We also question how the County will be able to afford retrofitting existing established neighborhoods with the infrastructure and amenities that they currently lack to turn them into “Complete Communities.” The draft Thrive Montgomery Plan will require a great deal of capital investment in new or existing County communities to achieve the Plan’s goals. These funds, however, are not now available, and are unlikely to be available in the near or mid-term future, without substantial County tax increases.</i></p> <p><i>Finally, we note that the draft Plan assumes that “If you build it, they will come.” This assumption won’t work, however, unless a significant number of new jobs are created. In view of its staggering costs, which businesses would not want to absorb, there is a significant likelihood that this plan will exacerbate Montgomery County’s failures in job growth. This County, with its low job growth rate and looming revenue deficits, needs to focus on incentives and incubator policies that will bring industry and business to the County. Fill those empty office buildings with businesses and startups.</i></p>		

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

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		<i>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.</i>		