

Community Coalition Letter on Thrive Montgomery 2050

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

November 17, 2020

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

Dear Chair Anderson and Members of the Planning Board:

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

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

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

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

Also critical to the success of the Plan is making sure that residents fully support the Plan, and that changes and goals are implemented in a manner compatible with the features and characteristics of local neighborhoods that communities cherish. For these reasons we recommend that the draft Plan expressly recognize and state that local municipalities continue to retain regulatory authority over building regulations for all types of residential housing within their jurisdictions, including Missing Middle housing and that unincorporated neighborhoods have a real say about the physical changes that are made within their boundaries.

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

High-Level Executive Summary of Suggestions & Concerns

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

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

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

- III. **Housing Affordability:** we encourage the County to consider increasing and diversifying areas for Missing Middle housing as well as provide more housing for essential workers and leverage naturally occurring affordable housing options including adaptive re-use of malls and other retail/office buildings which post COVID-19 may no longer be viable for their original and intended use; however the premise that we will need to house 200,000 more residents is based on pre-COVID-19 assumptions and providing Missing Middle housing is not ipso facto affordable.
- IV. **Transportation Access:** we encourage the County to develop a broader approach focused on BRT, specify how transit-centric transportation will be staged given COVID-19 realities, flexibly plan for traffic and technology advancements, integrate with other regional transportation plans, and accommodate demographics including aging, disabled, and young families that cannot use public transit; also, coordination with MDOT will be essential along with the recognition that County residents and visitors will use their cars.
- V. **Public Facility Implementation Plans:** the draft Plan will be expensive to implement so the County should specify payment plans for public facilities, pay more attention to how existing disadvantaged and low-income communities specifically will gain better access to transit and other amenities, coordinate with MCPS, Police and Fire & Rescue, and build in equity so that Complete Communities are available throughout the entire County.
- VI. **General Implementation Plan:** utilize Master & Sector Plans for implementation as well as design excellence standards; and update the Implementation Plan so that it reflects the realities of COVID-19.

Appendices A and B with some requests and questions.

Detailed Suggestions, Concerns & Questions for Improving Thrive Montgomery 2050

I. Complete Communities

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

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

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

1. **Provide a Map.** The draft Plan should contain information about the geographic location of the three types of Complete Communities. Specifically,
 - provide a map that shows in which parts of the County the urban, suburban, and rural Complete Communities will be located; and
 - clarify whether or not Complete Communities will be located in the Agricultural Reserve.Some information about key physical characteristics of each type of Complete Community should also be provided (e.g., ranges of acreage, desired population size and density, types of housing units and numbers of housing units per acre, mix of uses, amounts of and access to natural green space).
2. **Define Three Types of Complete Communities.** The Goals, Policies, and Actions for Complete Communities should describe what is required to be present in each of the three types of Complete Communities as well as how those areas of the County that will not be part of a Complete Community will be served.

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

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

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

The draft Plan acknowledges that moving the County's land use pattern away from suburban sprawl towards potentially more resilient and efficient Complete Communities will require additional density and other changes to existing single-family neighborhoods. It recognizes that to make these changes, resident support will be *needed*.

Residents of both unincorporated communities and incorporated municipalities share concerns about maintaining the physical aspects of their neighborhoods that make them suitable for and attractive to an economically, racially, and ethnically diverse range of potential residents. These aspects include:

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

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

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

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

4. **Define Amenities and Features of Each Type of Complete Community.** The draft Plan should spell out the minimal basic and specialized services and amenities that each of the three types of Complete Communities (urban, suburban, and rural) should contain.
5. **Define Metrics.** The draft Plan should include a policy requiring development of metrics, designed to identify time frames, actions, and results, for each type of Complete Community so that we know what we are striving to achieve, when we have achieved it, and the consequences for not achieving it.
6. **Prioritize Green Space.** The draft Plan should include a policy which requires that Complete Communities have access to nearby natural green space (i.e., no artificial turf and wherever possible unchanged natural landscape).

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

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

Complete Communities intend to provide residents with access to everything they need. As redevelopment and infill development occurs, affordable retail space is likely to be lost, and with it the small businesses that provide the goods and services needed for daily living. Retention of existing small businesses and establishment of new small businesses will be important in both economically disadvantaged areas and affluent areas. \

The need to retain small businesses and to attract new small businesses may come into conflict with some of the financing measures being considered such as split-rate taxing.

8. **Retain Historic Preservation.** The draft Plan should include a policy that requires that historic designations for commercial and residential properties located in Complete Communities will continue under current Historic Preservation laws and rules.
9. **Change 15-minute Living.** Consider modifying the definition of 15-minute living.

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

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

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

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

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

II. Financing Capacity

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

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

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

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

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

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

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

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

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

3. **Add Financing Strategies.** We recommend that the draft Plan include high-level fiscal analyses or associated financing and investment strategies that address how amenities will be added to all communities around the County so that they become Complete Communities.
4. **Share the Costs Between Developers & Residents.** The draft Plan should indicate how the costs of achieving the goals of the Plan will be shared between developers and residents.

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

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

III. Housing Affordability

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

1. **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 affordable or attainable by the income cohorts that the Plan seeks to help. Land within a half-mile proximity to primary public transit (Metro, BRT, Purple Line) in many neighborhoods is so expensive in Montgomery County today that the new housing will not even be affordable for families with moderate incomes. Allowing Missing Middle Housing in neighborhoods that are accessible via other public transit (e.g., Ride On bus and other bus routes on non-BRT routes) could produce additional housing that is far more realistically affordable. This change and expansion of focus and criteria would benefit underserved and disadvantaged communities and populations as the County’s housing stock overall is diversified in an upward direction. Additionally, expanding transit services in these neighborhoods seems desirable from an equity standpoint, will make them more attractive communities, and could result in increased investments there.

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

3. **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.

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

IV. Transportation Access

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

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

1. **Focus on Developing Transit but with a Broader Approach.** The draft Plan focuses on improving mass transit through adding bus rapid transit (BRT) routes and to a lesser degree rail service. Other forms of transit should be considered and incorporated.
2. **Specify How an Evolution from Car-centric Transportation to Transit-centric Transportation Will be Staged and Managed.** The draft Plan does not adequately consider interim stages between the County's transportation situation as it exists now and as it may become over time. This evolution and its timing for items such as sidewalk and bicycle route installations or improvements as well as ADUs and infill development's demand for on-street parking are of particular interest given the large investment of public funds that would be needed and the uncertainties in obtaining funding.
3. **Continue to Plan for Traffic.** The proposed BRT and rail options, even when added to existing Metro and bus lines (and the future Purple Line and planned BRT routes), will not create a transit network sufficient to get most County residents out of cars and hence to reduce traffic. The County's size, current settlement patterns, diverse population, and demographics require continued planning for vehicles and traffic, and the draft Plan should include strategies to do so. The County must maintain policy goals that include the realities of vehicular mobility and support acceptable motor vehicle levels of service. Traffic impacts everyone and planning for motor vehicle traffic still matters. The draft Plan now ignores the vehicular traffic needs of both small businesses and apartment developers, who tell us that they need to provide parking.
4. **Reevaluate Transit Needs in Light of Lessons from the Pandemic.** The spread of COVID-19 and subsequent changes to all areas of work, retail, delivery services, and family life are an object lesson in changing needs. The information already gleaned from changes to travel and telecommuting patterns should be incorporated into the draft Plan.
5. **Provide Flexibility for Future Developments.** The draft Plan is not poised to accommodate future transportation solutions, which are constantly evolving. The impacts of conversion to electric vehicles over the next 25 years, growth in private multi-passenger services (e.g. Uber and Lyft), and new forms of transportation that are likely to become available soon, such as autonomous vehicles, are not considered. Development in areas near transportation hubs will progress and impose new transportation needs, and the ongoing pandemic will change transportation needs in ways that cannot yet be predicted. The draft Plan should exhibit adequate flexibility to respond to current conditions or adapt to changing conditions over its time frame.
6. **Integrate with Other Jurisdictions from the Outset.** Despite recognizing these realities, the draft Plan does not adequately consider that State and Federal roads crisscross the County

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

7. **Accommodate Many Groups Who Cannot Use Mass Transit.** While the draft Plan focuses on equity, if the County does not plan for cars and insists on ‘road diets’, one direct consequence would be a significant negative impact on many groups of County residents, for whom the draft Plan would create inequities including:
 - Low income residents;
 - Senior citizens;
 - People with many types of disabilities.

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

8. **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. Community amenities such as libraries, recreation centers, and sports fields are not likely to be included and/or accessible in all areas. It is not realistic to expect families with young children to avoid vehicles for all education, medical, and recreational needs.

V. Public Facility Implementation Plans

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

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

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

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

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

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

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

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

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

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

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

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

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

VI. General Implementation Plan

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

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

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

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

We appreciate your full consideration of these concerns.

Respectfully Submitted,

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

Tracey Furman, Mayor
Town of Kensington

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

James A. Ruspi, Mayor
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Melanie Rose White, Chair
Citizens Coordinating Committee of Friendship
Heights*

Jeffrey Slavin, Mayor
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Cecily Baskir, Mayor
Town of Chevy Chase

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

Paula Fudge, Council Chair
Town of Chevy Chase View

Melanie Rose White, Mayor
Village of Friendship Heights

Kacky Chantry, Mayor
Town of Garrett Park

Adrian Adreassi, Council Chair
Village of North Chevy Chase

Willem Polak, Mayor
Town of Glen Echo

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

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

Appendix A – Requests

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

Appendix B – Specific Questions

Complete Communities:

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

Housing Affordability:

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

Transportation Access:

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

Businesses Growth:

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

Role of Municipalities:

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